LOS ANGELES DEPARTMENT OF CITY PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

1501 Marlay Drive Project

Case Number: ENV-2023-2650-MND

Project Location: 1501 N. Marlay Drive, Los Angeles, CA 90069

Community Plan Area: Hollywood

Council District: 4 - Nithya Raman

Project Description: The Project would involve the construction of one (1) single family home, associated landscaping, and a two-car garage on an approximately 5,025.8 square-foot (0.11 acre) parcel that is currently vacant and undeveloped. The residence would be approximately 1,201 square feet and the basements would be approximately 1,899 square feet for a total floor area of 3,100 square feet. The home would be a maximum of 29 feet tall. The Project requires a 21-foot dedication of land for Los Angeles Fire Department (LAFD) use, and three retaining walls on three sides, varying in height from 22 feet 2 inches to 35 feet 4 inches. The Project would require site grading of approximately 2,991 cubic yards of soil, of which all (2,991 cubic yards) would be exported. The Project Applicant is requesting ministerial and discretionary approvals as part of the Project, including without limitation: (a) Zoning Administrator's Adjustment to permit a portion of one (1) retaining wall measuring 14 feet 6 inches within the required front yard setback in lieu of the permitted maximum 42 inches in height; (b) Zoning Administrator's Determination to permit the construction of a new single-family dwelling on a lot fronting Marlay Drive which does not have a 20-foot wide continuous paved roadway from the driveway apron to the boundary of the hillside area; (c) Zoning Administrator Determination to permit the construction of three (3) new retaining walls of varying heights ranging from 22 feet 1.5 inches to 35 feet 4 inches in height in lieu of the otherwise permitted two (2) retaining walls with a maximum height of 10 feet or one 12-foot high retaining wall; (d) Zoning Administrator Determination to permit 0-foot 2-inch westerly front yard setback post-dedication in lieu of the otherwise required 5-foot minimum front yard setback; (e) Haul Route Application to export approximately 2,991 cubic yards within a Hillside Area; (f) Demolition, grading, excavation, and building permits; and (g) Other permits, ministerial or discretionary, as may be necessary pursuant to various sections of the LAMC from the City of Los Angeles Department of Building and Safety (and other municipal agencies) in order to execute and implement the Project.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
EcoTierra Consulting

APPLICANT:
Robert Stetcher

April 2026

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

An application for the proposed 1501 Marlay Project ("the Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study (IS) evaluates potential environmental effects resulting from construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public *Resources* Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Mitigated Negative Declaration is intended as an informational document and is ultimately required to be adopted by the decision-making body prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] *State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or*

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

5 MITIGATION MONITORING PROGRAM

The Mitigation Monitoring Program (MMP) is the document that will be used by the enforcement and monitoring agencies responsible for the implementation of the Project's mitigation measures and Project Design Features. Mitigation measures and Project Design Features are listed by environmental topic.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.1.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project could have potentially significant environmental

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

impacts but mitigation measures agreed to by the applicant would avoid or reduce such impacts to a point where clearly no significant impacts would occur.

A Notice of Intent to Adopt a Mitigated Negative Declaration (MND) or Negative Declaration (ND) is provided to inform the general public, responsible agencies, trustee agencies, and the county clerk of the availability of the document and the locations where the document can be reviewed. A 20-day review period (or 30-day review period when the document is submitted to the State Clearinghouse for state agency review) is identified to allow the public and agencies to review the document. The notice is mailed to any interested parties and is noticed to the public through publication in a newspaper of general circulation.

The decision-making body then considers the Mitigated Negative Declaration or Negative Declaration, together with any comments received during the public review process, and may adopt the MND or ND and approve the project. In addition, when approving a project for which an MND or ND has been prepared, the decision-making body must find that there is no substantial evidence that the project will have a significant effect on the environment, and that the ND or MND reflects the lead agency's independent judgement and analysis. When adopting an MND, the lead agency must also adopt a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented to mitigate or avoid significant environmental effects.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**1501 MARLAY**
ENVIRONMENTAL CASE NO.	ENV-2023-2650-MND
RELATED CASES	ZA-2017-2328-ZAD-ZAA, ENV-2017-2329-CE

PROJECT LOCATION	**1501 N. MARLAY DRIVE, LOS ANGELES, 90069** **APN 5556-031-004**
COMMUNITY PLAN AREA	HOLLYWOOD
GENERAL PLAN DESIGNATION	LOW II RESIDENTIAL
ZONING	R1-1-HCR
COUNCIL DISTRICT	4 - NITHYA RAMAN

LEAD CITY AGENCY	**City of Los Angeles Department of City Planning**
STAFF CONTACT	JANE CHOI
ADDRESS	200 N. SPRING ST., ROOM 621 LOS ANGELES, CA. 90012
PHONE NUMBER	(213) 978-1379
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APPLICANT	ROBERT STETCHER
ADDRESS	185 EAST 85TH STREET, NEW YORK, NY 10028
PHONE NUMBER	(917) 409-0002

PROJECT DESCRIPTION

The Project would involve the construction of one (1) single family home, associated landscaping, and a two-car garage on an approximately 5,025.8 square-foot (0.11 acre) parcel that is currently vacant and undeveloped. The residence would be approximately 1,201 square feet and the basements would be approximately 1,899 square feet for a total floor area of 3,100 square feet. The home would be a maximum of 29 feet tall. The Project requires a 21-foot dedication of land for Los Angeles Fire Department (LAFD) use, and three retaining walls on three sides, varying in height from 22 feet 2 inches to 35 feet 4 inches. The Project would require site grading of approximately 2,991 cubic yards of soil, of which all (2,991 cubic yards) would be exported. The Project Applicant is requesting ministerial and discretionary approvals as part of the Project, including without limitation: (a) Zoning Administrator's Adjustment to permit a portion of one (1) retaining wall measuring 14 feet 6 inches within the required front yard setback in lieu of the permitted maximum 42 inches in height; (b) Zoning Administrator's Determination to permit the construction of a new single-family dwelling on a lot fronting Marlay Drive which does not have a 20-foot wide continuous paved roadway from the driveway apron to the boundary of the hillside area; (c) Zoning Administrator Determination to permit the construction of three (3) new retaining walls of varying heights ranging from 22 feet 1.5 inches to 35 feet 4 inches in height in lieu of the otherwise permitted two (2) retaining walls with a maximum height of 10 feet or one 12-foot high retaining wall; (d) Zoning Administrator Determination to permit 0-foot 2-inch westerly front yard setback post-dedication in lieu of the otherwise required 5-foot minimum front yard setback; (e) Haul Route Application to export approximately 2,991 cubic yards within a Hillside Area; (f) Demolition, grading, excavation, and building permits; and (g) Other permits, ministerial or discretionary, as may be necessary pursuant to various sections of the LAMC from the City of Los Angeles Department of Building and Safety (and other municipal agencies) in order to execute and implement the Project.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

ENVIRONMENTAL SETTING

The Project Site consists of one irregularly-shaped parcel which is currently vacant and undeveloped. The lot is approximately 5,025.8 square feet (0.11 acre) and is located at the terminus of Marlay Drive, with vacant land to the immediate west, a single-family residence that is Los Angeles Historic Cultural Monument No. LA-670 (Stahl House – Case Study House #22) to the north above the slope, a vacant lot and single-family homes to the east along Marlay Drive, and a vacant lot to the immediate south across Marlay Drive. The Project Site is upsloping and has a gradient from 1:1 to 0.8:1, where the slope ranges in vertical height from 10 to 25 feet.

Regional access to the Project Site is provided by the Hollywood Freeway (US-101), located east of the Project Site, approximately 3.4 miles from the site by car. Local access to the Project Site is provided via Laurel Canyon Boulevard and Sunset Boulevard.

The vacant, undeveloped Project Site is located within an urbanized setting in the Hollywood Hills area of the City within the Hollywood Community Plan area. The surrounding area is characterized by single family residential uses and vacant, undeveloped land.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

None.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, pursuant to PRC Section 21084.2, AB 52 notification of the Project was sent to ten (10) Native American tribes requesting information regarding cultural resources of Native American origin within or near the Project Site on October 28, 2022. Two tribes, the Fernandeño Tataviam Band of Mission Indians and the Gabrieleño Band of Mission Indians – Kizh Nation, responded to the request to consult. Consultations were completed and mitigation measures recommended by each tribe were incorporated into this initial study.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology / Water Quality	☐ Transportation
☐ Biological Resources	☐ Land Use / Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities / Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology / Soils	☐ Population / Housing	☐ Mandatory Findings of Significance

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Jane Choi	Principal City Planner
PRINTED NAME	**TITLE**
Jane Choi	April 1, 2026
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

REGULATORY COMPLIANCE MEASURES, MITIGATION MEASURES, & ENVIRONMENTAL PROTECTION MEASURES

The Initial Study has determined that the following regulatory compliance measures and Environmental Protection Measures and Noise and Vibration Standards shall be incorporated into the Project:

Biological Resources

Regulatory Compliance Measure

RCM BIO-1 If possible, ground disturbing activities and vegetation removal (including tree trimming) should be timed to occur outside the bird nesting season (September 1 – January 31).

If ground disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (February 1 – August 31) a preconstruction survey for nesting birds should be conducted within 72 hours prior to construction activities. The survey should be conducted by a qualified biologist with prior experience conducting nesting bird surveys for construction projects. The study area should include the Project Site and suitable habitat within a 300-foot buffer, or a buffer size determined by the qualified biologist based on level of proposed disturbance and access. If no active nests are found, no additional measures are required.

If active nests are found the biologist will map the location and document the species and nesting stage. A no-work buffer will be established around the active nest as determined by the qualified biologist and based on the species sensitivity to disturbance and the type and duration of the disturbance. No construction activities shall occur within the no-work buffer until the biologist has determined the nest is no longer active.

Cultural Resources

Mitigation Measures

MM CUL-1 Retention of Qualified Structural Engineer and Architectural Historian

Prior to the start of project construction, the Applicant shall retain 1) a qualified structural engineer with demonstrated professional experience working with historic buildings and implementing vibration and slope monitoring programs; and 2) a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for architectural history and/or historic architecture (per Title 36 Code of Federal Regulations Part 61) and has demonstrated professional experience implementing historical resource monitoring and protection plans to oversee implementation of the Historical Resource Monitoring and Protection Plan for the Stahl House (Attachment C to the HRA, which is **Appendix C.1** to this Initial Study). The qualifications of the selected

individuals shall be reviewed and approved by City of Los Angeles Office of Historic Resources planning staff prior to the start of project construction.

MM CUL-2 Implementation of Historical Resource Monitoring and Protection Plan

A detailed Historical Resource Monitoring and Protection Plan (Attachment C to the HRA, which is **Appendix C.1** to this Initial Study) was prepared in consideration of potential impacts to the adjacent Stahl House resulting from vibration and slope instability. The Applicant shall ensure that all of the required elements of the Plan are adhered to throughout the various stages of pre-construction, construction, and post-construction, and that all training, monitoring, and reporting requirements are completed in accordance with the schedule outlined in the Plan. The project's structural engineer, architectural historian, and on-site construction manager shall be empowered to halt all construction activity that falls out of compliance with the Plan or poses a physical threat to the Stahl House. No construction activity may resume until the threat is analyzed, preventative measures are put in place, and approval is provided by both the project's structural engineer and architectural historian.

Noise

Environmental Protection Measures and Noise and Vibration Standards (EPMs/NVs) from the City of Los Angeles Construction Noise and Vibration Updates to Thresholds and Methodology (2024)

NV1-1 Power construction equipment (including combustion engines), fixed or mobile, will be equipped with noise shielding and muffling devices consistent with manufacturers' standards or best available control technology. All equipment will be properly maintained, and the applicant or owner will require any construction contractor to keep documentation on-site during earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

NV1-2 Driven (impact) pile systems shall not be used, except in locations where the underlying geology renders drilled piles, sonic, or vibratory pile drivers infeasible, as determined by a soils or geotechnical engineer and documented in a soils report.

NV1-3 All outdoor mechanical equipment (e.g., generators, compressors, concrete/industrial saws) shall be enclosed or visually screened. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line of sight between the equipment and any off-site noise-sensitive uses.

NV1-4 Construction staging areas shall be located as far from Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden

of proving what constitutes 'as far as possible' shall be upon the Applicant or Owner, in consideration of the above factors.

Tribal Cultural Resources

Mitigation Measures

MM TCR-1 If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.

a. Should the find be deemed significant, as defined by CEQA (as amended, 2015), the Project applicant shall retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

MM TCR-2a Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered

TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-2b Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

a. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural, and/or historic purposes.

MM TCR-2c Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

b. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

c. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

d. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

e. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

f. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project would involve the construction of one (1) single family home, associated landscaping, and a two-car garage on an approximately 5,025.8 square-foot (0.11 acre) parcel that is currently vacant and undeveloped. The residence would be approximately 1,201 square feet and the basements would be approximately 1,899 square feet for a total floor area of 3,100 square feet. The home would be a maximum of 29 feet tall. The Project requires a 21-foot dedication of land for a minimum turn-around area per Los Angeles Fire Department (LAFD) requirement, and three retaining walls on three sides, varying in height from 22 feet 2 inches to 35 feet 4 inches. The Project would require site grading of approximately 2,991 cubic yards of soil, of which all (2,991 cubic yards) would be exported. The Project Applicant is requesting ministerial and discretionary approvals as part of the Project, including without limitation: (a) Zoning Administrator's Adjustment to permit a portion of one (1) retaining wall measuring 14 feet 6 inches within the required front yard setback in lieu of the permitted maximum 42 inches in height; (b) Zoning Administrator's Determination to permit the construction of a new single-family dwelling on a lot fronting Marlay Drive which does not have a 20-foot wide continuous paved roadway from the driveway apron to the boundary of the hillside area; (c) Zoning Administrator Determination to permit the construction of three (3) new retaining walls of varying heights ranging from 22 feet 1.5 inches to 35 feet 4 inches in height in lieu of the otherwise permitted two (2) retaining walls with a maximum height of 10 feet or one 12-foot high retaining wall; (d) Zoning Administrator Determination to permit 0-foot 2-inch westerly front yard setback post-dedication in lieu of the otherwise required 5-foot minimum front yard setback; (e) Haul Route Application to export approximately 2,991 cubic yards within a Hillside Area; (f) Demolition, grading, excavation, and building permits; and (g) Other permits, ministerial or discretionary, as may be necessary pursuant to various sections of the LAMC from the City of Los Angeles Department of Building and Safety (and other municipal agencies) in order to execute and implement the Project.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site consists of one irregularly-shaped parcel which is currently vacant and undeveloped. The lot is approximately 5,025.8 square feet (0.11 acre) and is located at the terminus of Marlay Drive, with vacant land to the immediate west, a single-family residence that is Los Angeles Historic Cultural Monument No. LA-670 (Stahl House – Case Study House #22) to the north above the slope, a vacant lot and single-family homes to the east along Marlay Drive, and a vacant lot to the immediate south across Marlay

Drive. The site is upsloping and has a gradient from 1:1 to 0.8:1, where the slope ranges in vertical height from 10 to 25 feet.

Regional access to the Project Site is provided by the Hollywood Freeway (US-101), located east of the Project Site, approximately 3.4 miles from the site by car. Local access to the Project Site is provided via Laurel Canyon Boulevard and Sunset Boulevard.

The vacant undeveloped Project Site is located within an urbanized setting in the Hollywood Hills area of the City within the Hollywood Community Plan area. The surrounding area is characterized by single family residential uses and vacant, undeveloped land.

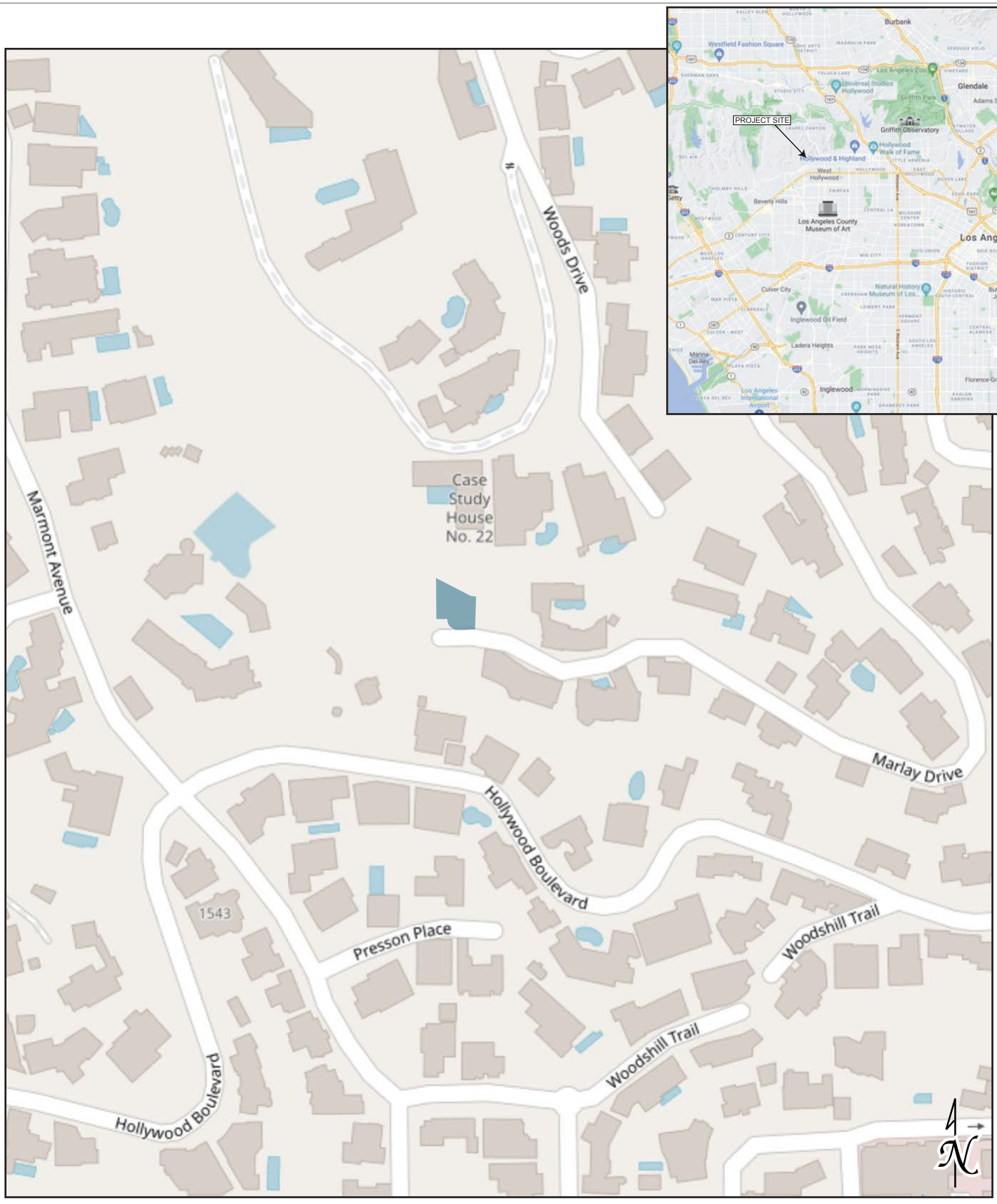
See Figure 1, Regional and Vicinity Project Location Map, and Figure 2, Aerial Photograph of Project Site and Surrounding Uses.

3.2.2 Existing Conditions

The 5,025.8 square-foot (0.11 acre) irregularly-shaped parcel is currently vacant and undeveloped. The Project Site slopes steeply upward to the north and has a gradient from 1:1 to 0.8:1, where the slope ranges in vertical height from 10 to 25 feet. Marlay Drive is a Substandard Hillside Limited Street with a dedicated right-of-way width of 26 feet and a roadway width of zero feet in the front of the Project Site. The Project Site is located within the Hollywood Community Plan area, which designates the project site for Low II density residential land uses. The Project Site is zoned R1-1-HCR (One Family – Height District No. 1 – Hillside Construction Regulation Supplemental Use District). The Project Site is also located within an Urban Agricultural Incentive Zone, a Hillside Area, a Very High Fire Severity Zone, and a Bureau of Engineering (BOE) Special Grading Area.

3.2.3 Surrounding Land Uses

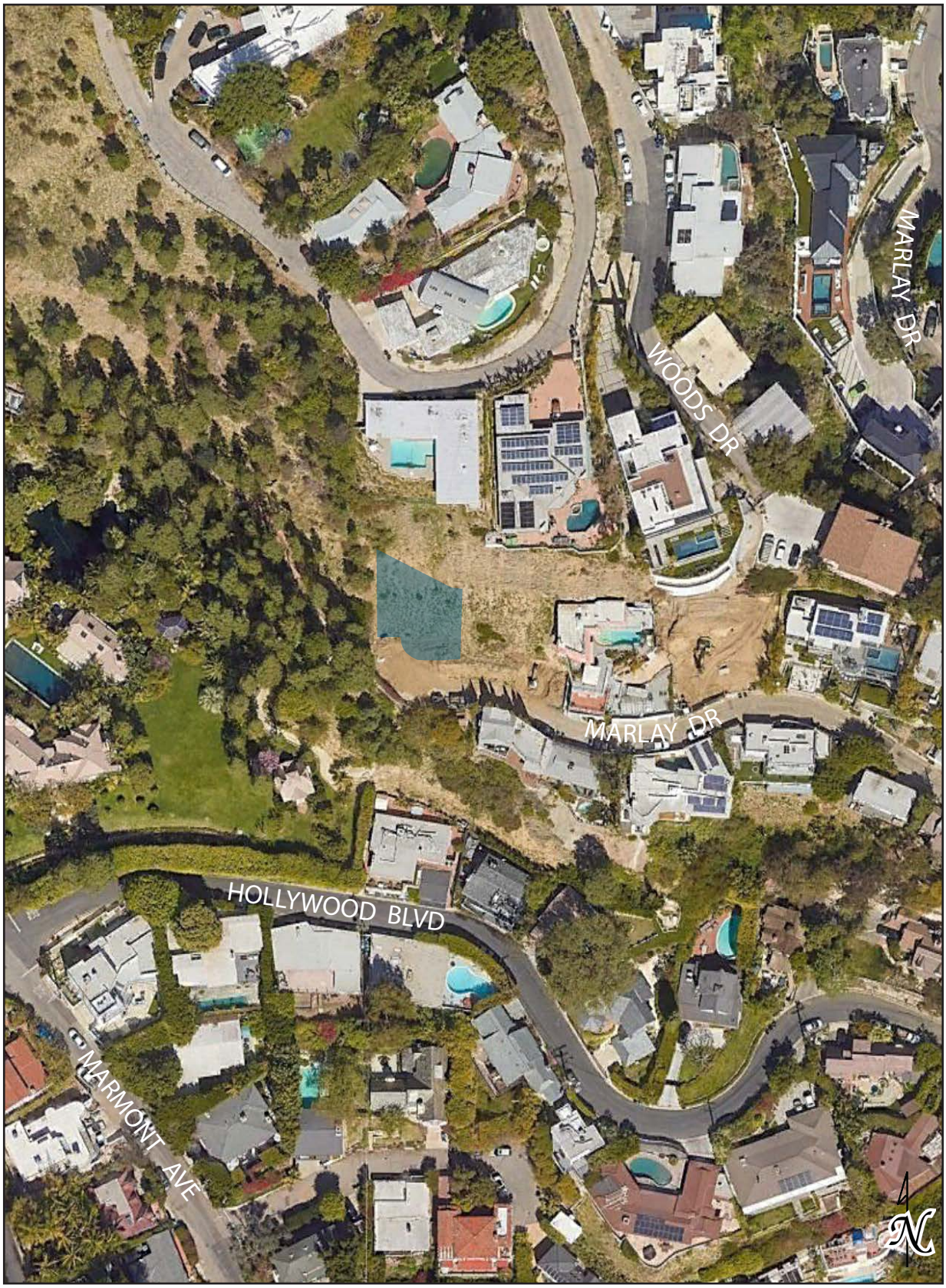
The Project Site is located within an urbanized setting in the Hollywood Hills area of the City within the Hollywood Community Plan area. The surrounding area is characterized by single family residential uses and vacant undeveloped land, which are zoned R1-1-HCR and RE9-1-HCR. The property to the immediate north is a locally designated Historic-Cultural Monument (HCM No. LA-670 Stahl House – Case Study House #22) listed on the California Register of Historical Resources and the National Register of Historic Places. The property to the west of the Project Site is Marmont Manor which is approximately 167,949 square feet. Other properties within a 100-foot radius of the Project Site are generally between 4,800 square feet and 13,400 square feet.



Project Site

Source: OpenStreetMap, January 2023.

Figure 1
Regional and Vicinity Project Location Map



Project Site

Source: Google Earth, January 2020.

Figure 2
Aerial Photograph of the Project Site and Surrounding Uses

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project would involve the construction of one (1) single family home, associated landscaping, and parking on an approximately 5,025.8 square-foot (0.11 acre) parcel that is currently vacant and undeveloped. The residence would be approximately 3,100 square feet, including approximately 1,899 square feet of basements. The home would be a maximum of 29 feet tall and have two covered parking spaces. The Project requires a 21-foot dedication of land for a minimum turn-around area per Los Angeles Fire Department (LAFD) requirement, and retaining walls on three sides. The Project would require site grading of approximately 2,991 cubic yards of soil, of which all (2,991 cubic yards) would be exported. See Figures 3 through 9 for the proposed Project plans.

3.3.2 Design and Architecture

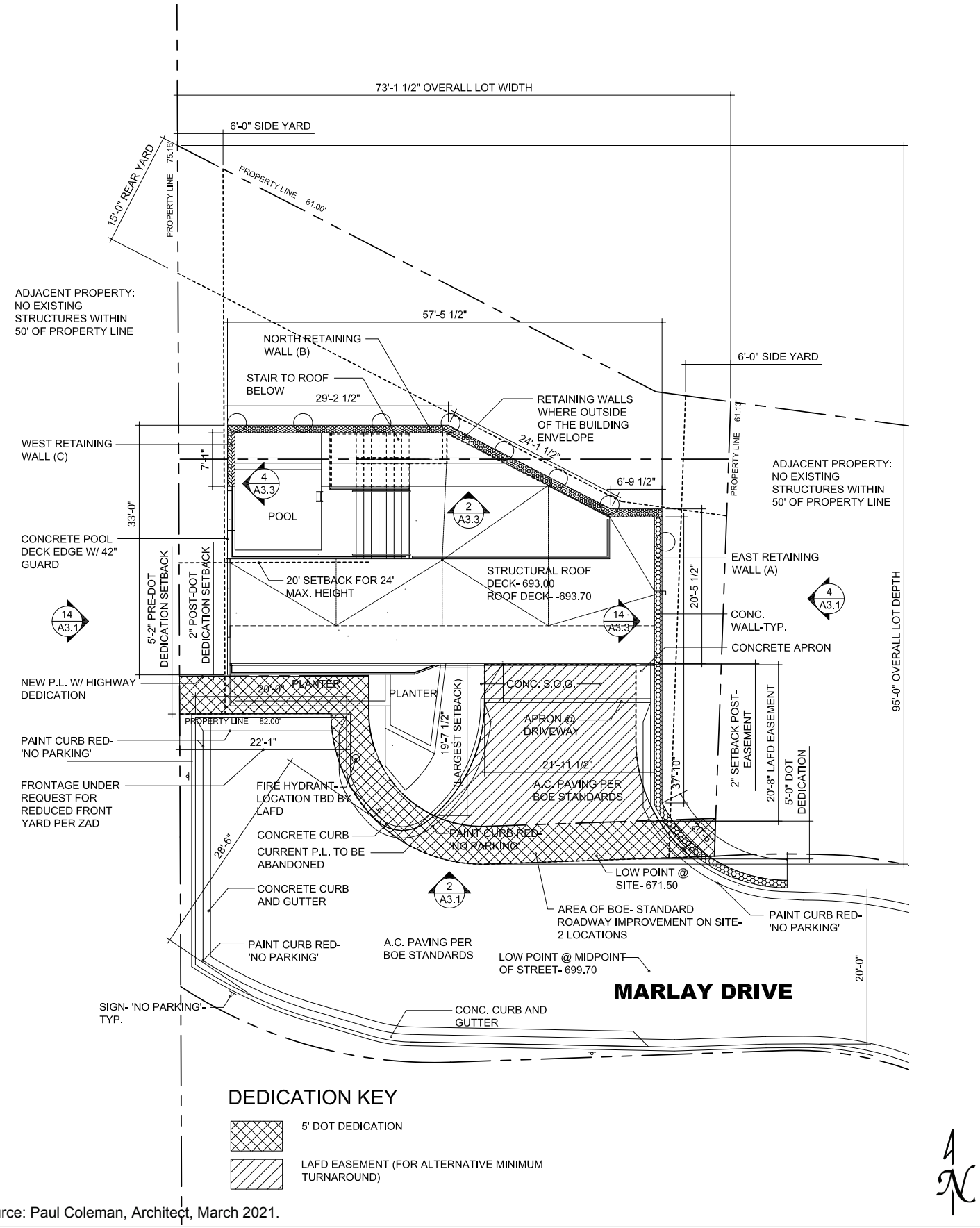
The Project has been designed to accommodate a house on a sloped lot, retaining earth on three sides of the home where three of the house's walls act as retaining walls. The proposed north (rear) wall would be raised above finished grade, to meet a 45 degree grade plane off of the top of the slope, per the requirements of the City of Los Angeles Soils and Grading Department. The retaining walls would be finished in darker or earth-tone colors, and would be covered with wall-mounted planters and vines. The home has been designed so that the fourth wall which faces Marlay Drive includes variation in the massing and façade, using different materials including glass to create openings along the street elevation.

3.3.3 Sustainability Features

The proposed home would meet all City Building Code and Title 24 requirements. The building would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star®-rated appliances if provided, water saving/low-flow fixtures, non-volatile organic compound paints/adhesives, drought-tolerant planting, and high performance building envelopment to meet the Building Code and Title 24 for building sustainability.

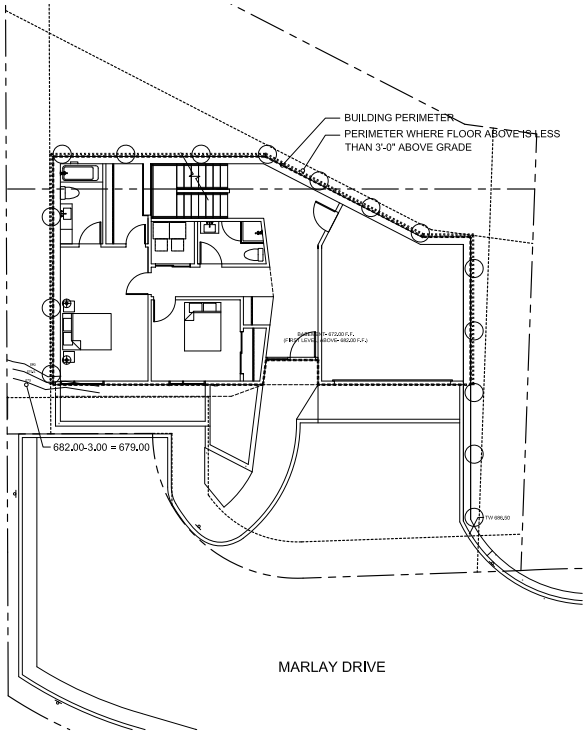
3.3.4 Anticipated Construction Schedule

The Project is expected to begin construction activities in the third quarter of 2026. Construction activities would include excavation, grading, foundations, building construction, and finishing and would be expected to take 26 months in total. Specifically, excavation and grading is expected to require 3 months, foundation preparation and retaining walls 6 months, and building over 11 months. The improvements of Marlay Drive would require approximately 6 months, to be done after construction of the home is complete. Occupancy is expected in fourth quarter 2028. The Project would require site grading of approximately 2,991 cubic yards of soil, of which all (2,991 cubic yards) would be exported.



Source: Paul Coleman, Architect, March 2021.

Figure 3
Proposed Site Plan



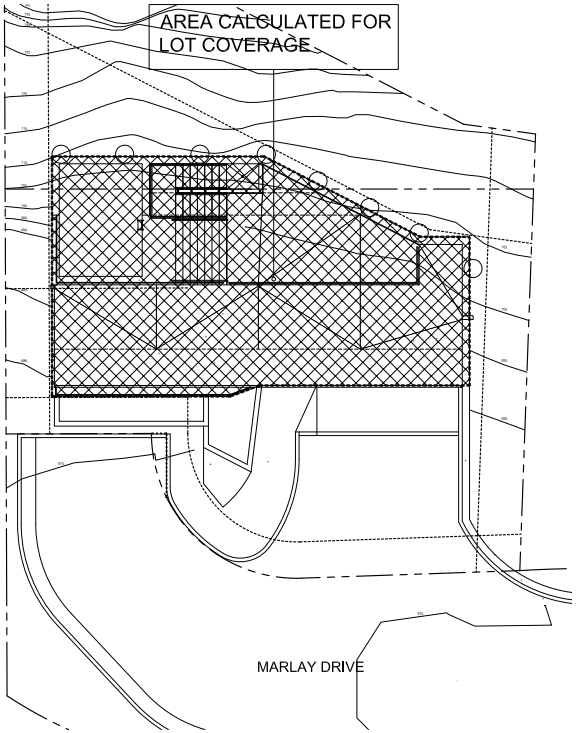
FLOOR PLAN

BASEMENT CALCULATION

TOTAL LENGTH = 175.75

LENGTH WHERE FLOOR ABOVE IS < 3'-0" ABOVE GRADE = 111.75

111.75/175.75= 63.58% >60% OK



SITE PLAN

LOT COVERAGE AREA

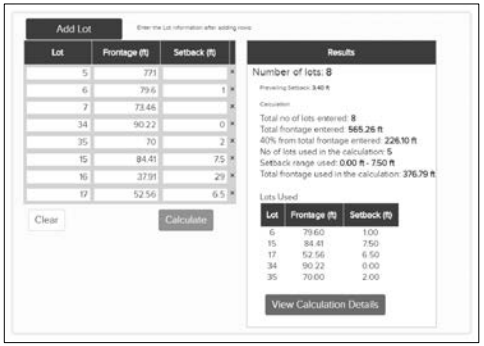
LOT AREA = 5,025.8 SQUARE FEET

LOT COVERAGE = 1,657.2 SQUARE FEET

1,657.2 S.F. / 5,025.8 S.F. = 0.33

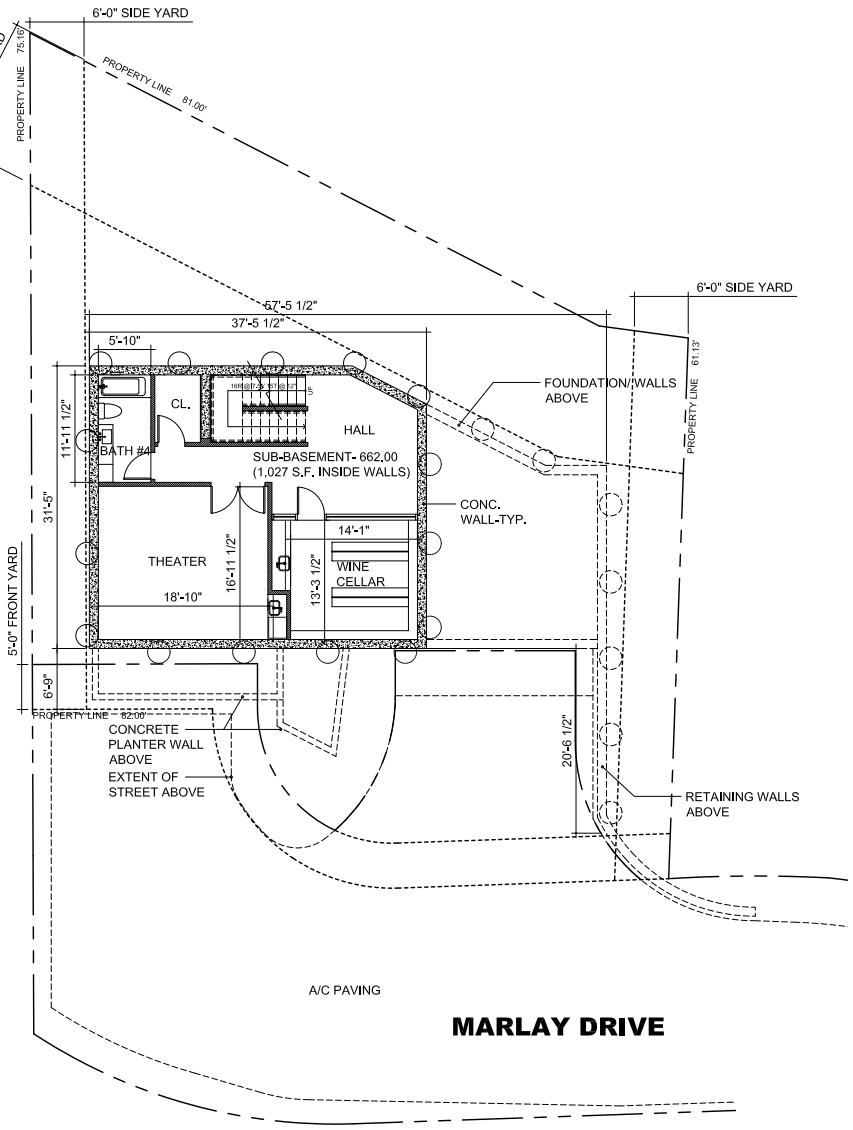
LOT COVERAGE = 33% < 40%- OK

PREVAILING SETBACK CALCULATOR:



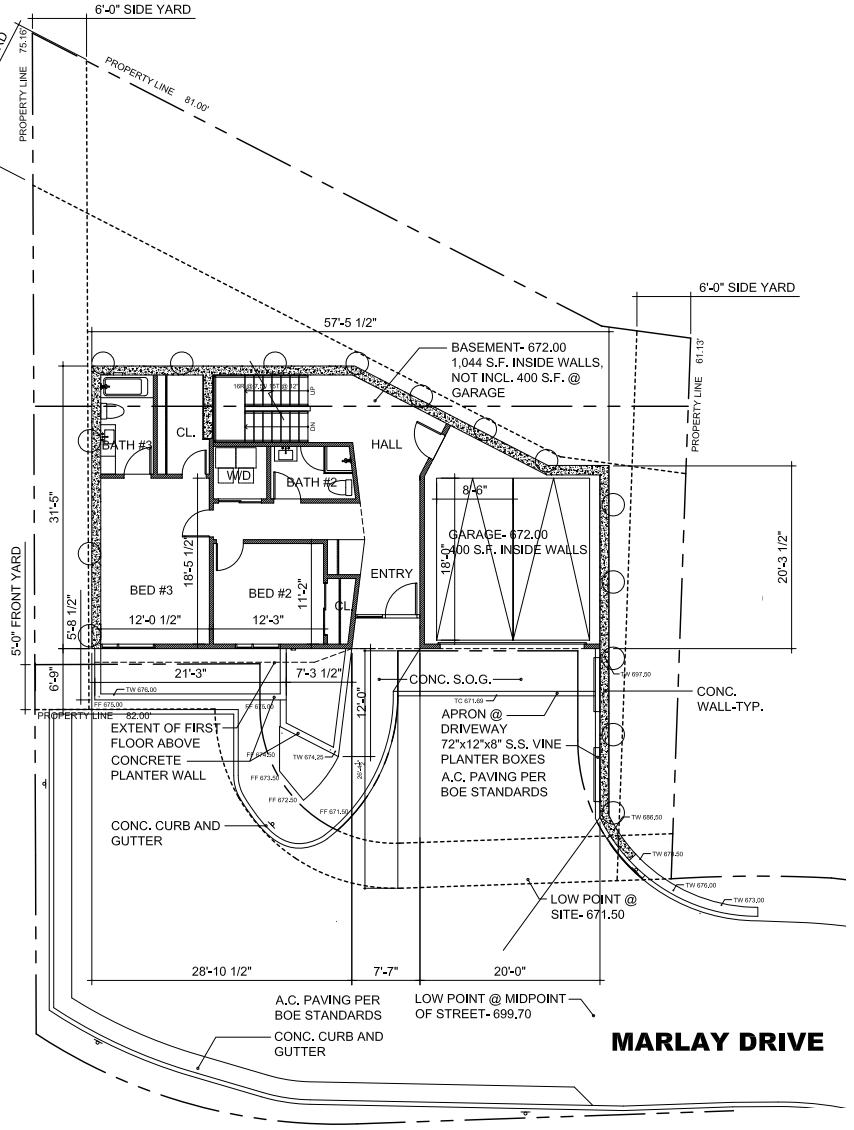
Source: Paul Coleman, Architect, March 2021.

Figure 4
Zoning Diagrams



SUB-BASEMENT LEVEL PLAN

01'2' 5' 10'

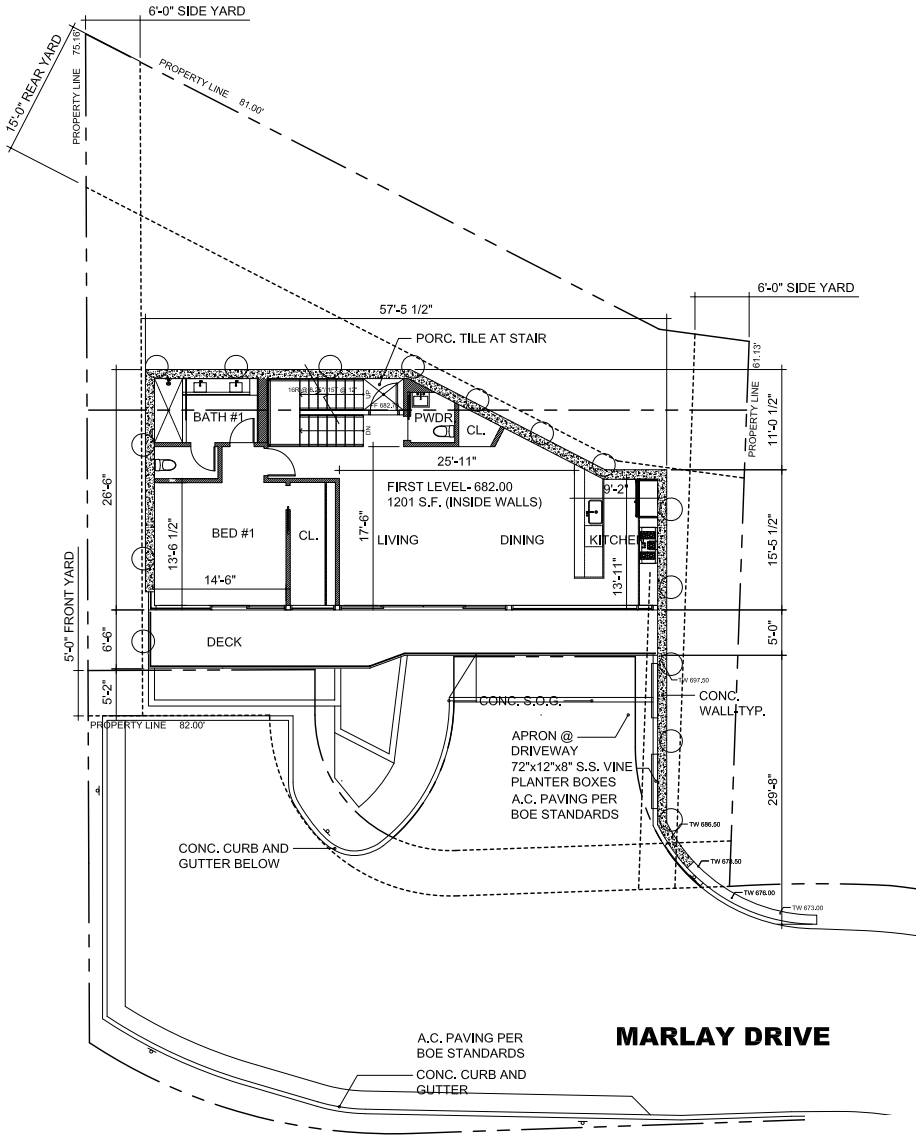


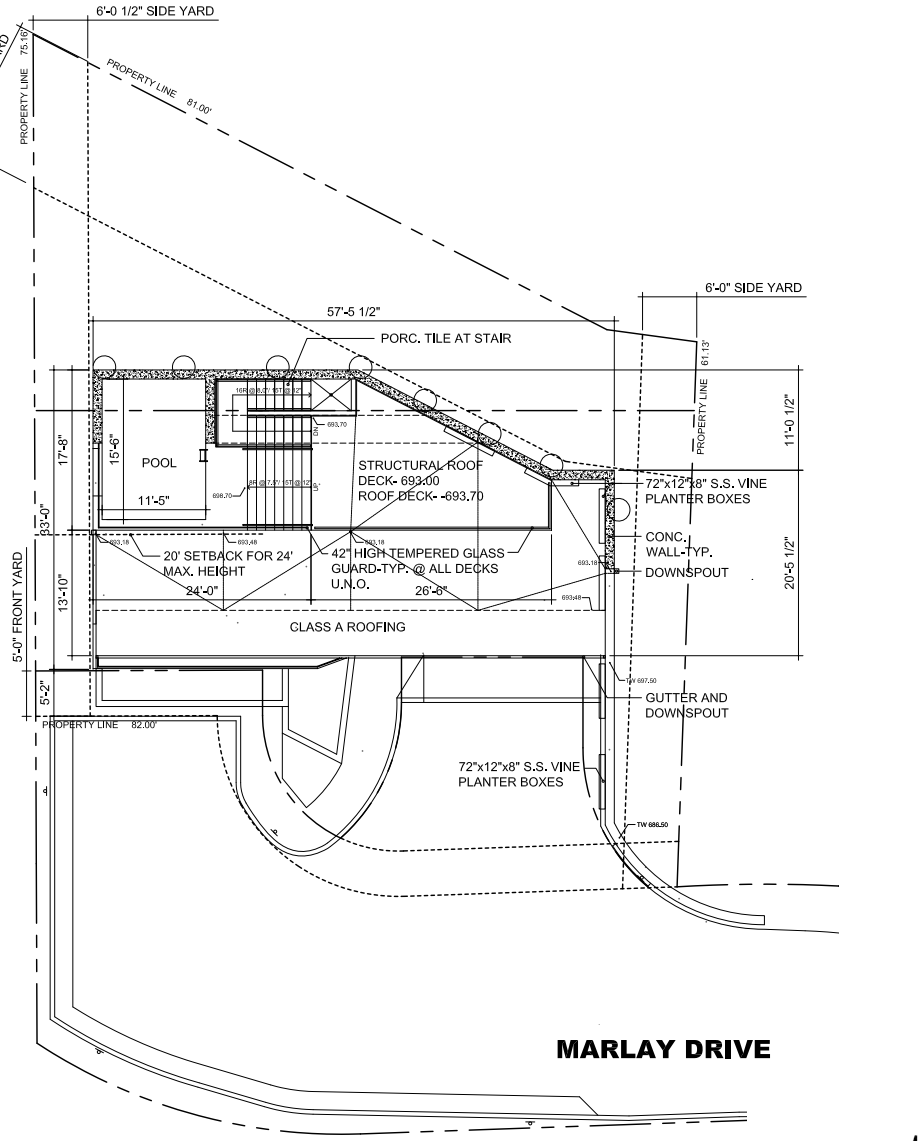
BASEMENT LEVEL PLAN

01'2' 5' 10'

Source: Paul Coleman, Architect, March 2021.

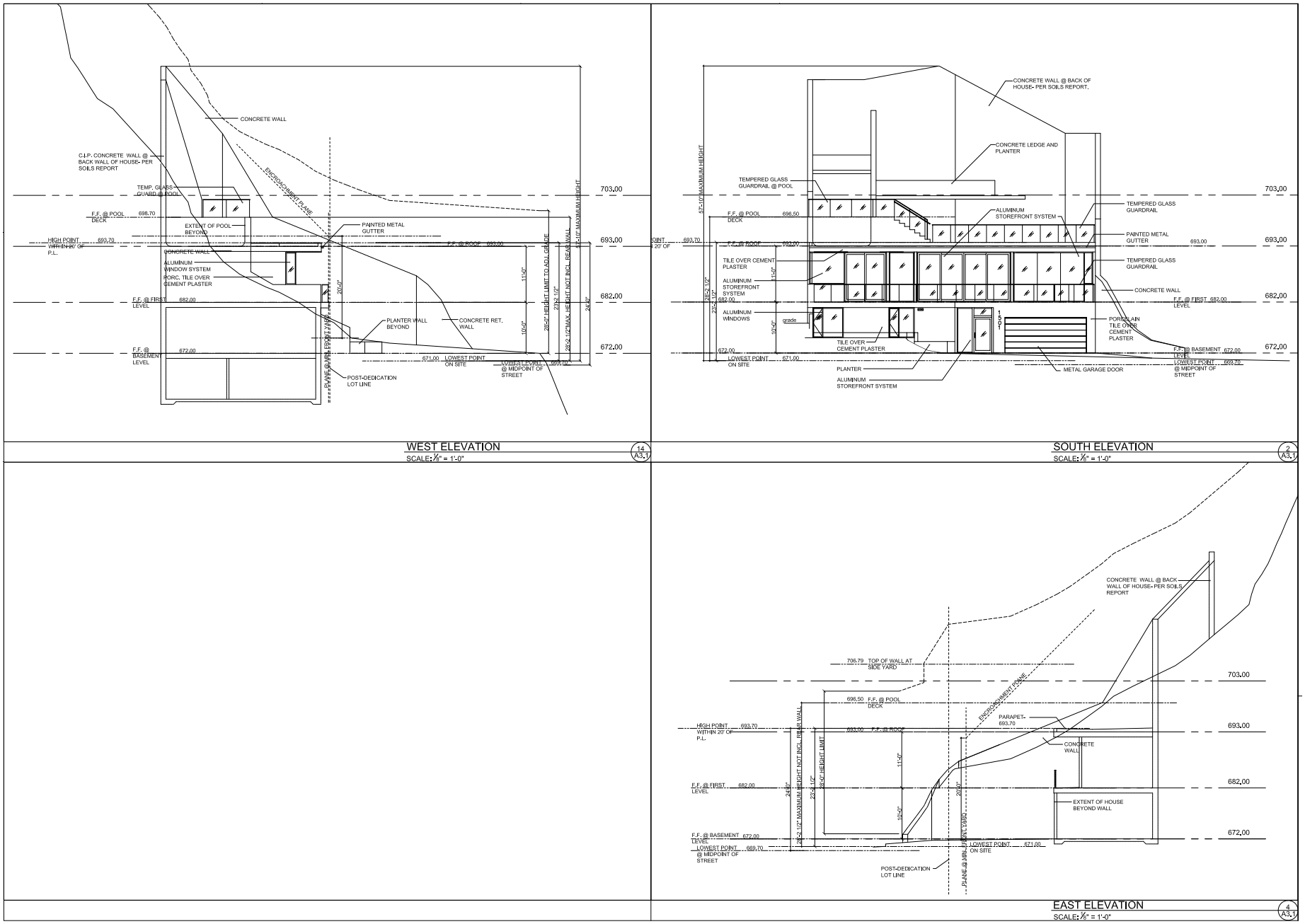
Figure 5
Floor Plans





Source: Paul Coleman, Architect, March 2021.

Figure 6
Floor/Roof Plans



Source: Paul Coleman, Architect, March 2021.

Figure 7
Exterior Elevations

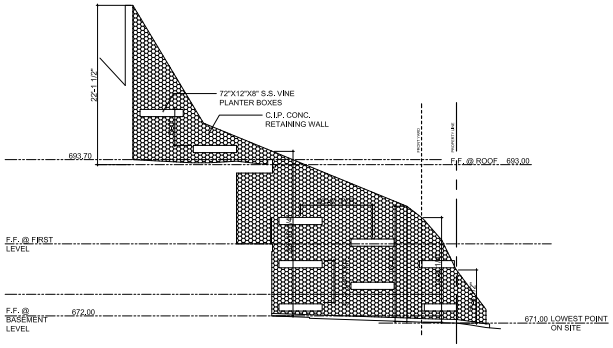
SOUTHWEST AERIAL VIEW
SCALE: NTS

VIEW FROM SOUTHWEST
SCALE: NTS

VIEW FROM SOUTHEAST
SCALE: NTS

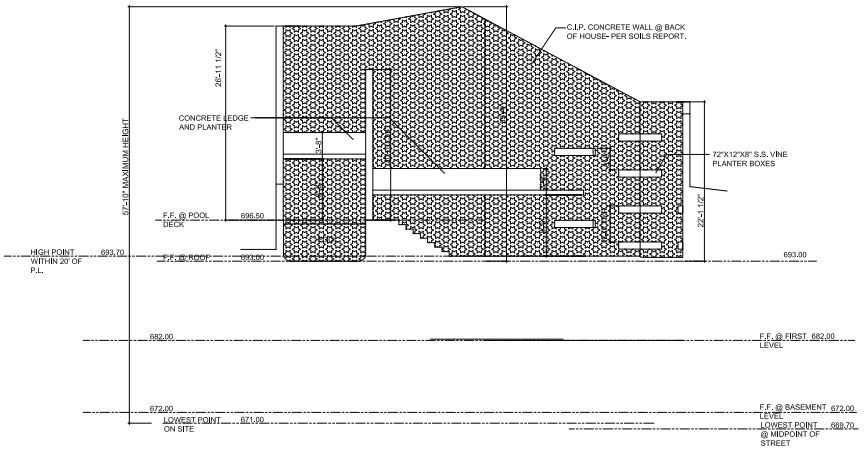
Source: Paul Coleman, Architect, March 2021.

Figure 8
Project Renderings



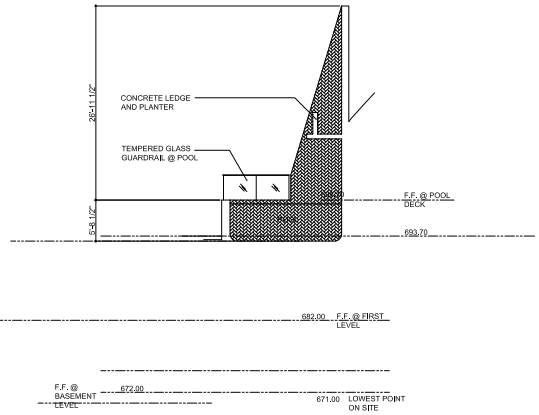
EAST RETAINING WALL ELEVATION (A) 14 A3.3

SCALE: 1/4" = 1'-0"



NORTH RETAINING WALL ELEVATION (B) 2 A3.3

SCALE: 1/4" = 1'-0"



WEST RETAINING WALL ELEVATION (C) 4 A3.3

SCALE: 1/4" = 1'-0"

Source: Paul Coleman, Architect, March 2021.

Figure 9
Retaining Wall Elevations

The likely haul route would be Marlay Drive to Crescent Heights, to Hollywood Boulevard, to La Brea Avenue, to the Franklin Avenue, to Highland Avenue, to Hollywood Freeway (Interstate 101). Exported materials would be disposed at the Puente Hills landfill in the City of Whittier (soil only), Bradley Landfill and Recycling Center in Sun Valley, and/or at the Atkinson Brickyard site in the City of Compton.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Initial Study and Mitigated Negative Declaration analyzes impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Zoning Administrator's Adjustment to permit a portion of one (1) retaining wall measuring 14 feet 6 inches within the required front yard setback in lieu of the permitted maximum 42 inches in height;
- Zoning Administrator's Determination to permit the construction of a new single-family dwelling on a lot fronting Marlay Drive which does not have a 20-foot wide continuous paved roadway from the driveway apron to the boundary of the hillside area;
- Zoning Administrator Determination to permit the construction of three (3) new retaining walls of varying heights ranging from 22 feet 1.5 inches to 35 feet 4 inches in height in lieu of the otherwise permitted two (2) retaining walls with a maximum height of 10 feet or one 12-foot high retaining wall;
- Zoning Administrator Determination to permit 0-foot 2-inch westerly front yard setback post-dedication in lieu of the otherwise required 5-foot minimum front yard setback;
- Haul Route Application to export approximately 2,991 cubic yards within a Hillside Area;
- Demolition, grading, excavation, and building permits; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, limitation trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A significant impact may occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista.

The Project Site is located in an urbanized portion of the City of Los Angeles, in an area developed primarily with residential uses. The Project Site lies within the eastern portion of the Santa Monica Mountains, and thus panoramic views from Marlay Drive and surrounding roadways mostly consist of views of the immediate hillsides, interspersed with residential development, and the surrounding City views. Views of the Santa Monica Mountains are occasionally available from existing lookout points and public streets in the area surrounding the Project Site. However, given the topography of the surrounding area, panoramic views from local streets are obstructed by intervening buildings and the Project Site, and views are generally of the City rather than the

mountains because of the location within the hills. The Project Site is currently undeveloped and ungraded, with no pedestrian or vehicular access. Therefore, although City views are available from the Project Site, those views are not accessible to the public. The Project would result in the construction of a new single-family home, which would be built into an existing hillside on an upslope and thus would not create a new obstruction of any views. Views of the mountains and City would still be available via street corridors, as are currently available. Further, there are no focal views available in the vicinity that would be blocked by the Project.

The property to the immediate north is a locally designated Historic-Cultural Monument (HCM No. LA-670 Stahl House – Case Study House #22) listed on the California Register of Historical Resources and the National Register of Historic Places. South Environmental LLC prepared a Historic Resources Assessment[2] (HRA) for the Project by in November 2022. As part of the HRA, potential impacts of the Project on views from the Stahl House were evaluated; the analysis is summarized below and can be found in its entirety in the HRA which is included as **Appendix C.1** to this Initial Study.

The Stahl House offers a 240-degree view of Los Angeles that extends from Downtown Los Angeles to Century City to the Pacific Ocean and beyond. Viewsheds with the potential to be impacted by the Project include views from the southwest corner of the Stahl House, the pool deck, and the living room. Of the many publicly posted pictures of the Stahl House online, the most common angle photographed is the southwest corner of the property, with the Los Angeles nighttime sky in the distance.

As demonstrated in the photographs provided in **Appendix C.1**, also included as Figure 10, none of the existing homes located on the north side of Marlay Drive are visible from this viewshed, as they lie directly below the Stahl House at the base of a near 90-degree slope. Even when trying to see over the edge near the southwest corner, none of the homes and very little of Marlay Drive is visible (see Figure 11). Another viewshed that appears in numerous photographs of and from the Stahl House is the view from the pool deck, particularly its southernmost concrete walkway, closest to the steep drop-off. One must be standing at the edge of the concrete walkway and looking directly down to see a small section of Marlay Drive (see Figure 12). Therefore, the Project has no potential to disrupt this viewshed.

The Stahl House also has a viewshed of the cityscape seen from the glass living room, overlooking Los Angeles. As shown in Figure 13, none of the existing homes located on the north side of Marlay Drive are visible from this from the southwest corner of the living room while looking straight down, as they lie directly below the Stahl House where the cliff drops off sharply at a near 90-degree angle. Residences on the south side of Marlay Drive are visible from this viewpoint. Although portions of the Project Site are visible from this viewshed (see Figure 13), the Project would be built into the hillside below the ridgeline and has no potential to obscure the panoramic views from the living room of the Stahl House.

[2] *South Environmental LLC, Historic Resources Assessment for 1501 N. Marlay Drive, Los Angeles, November 2022. See Appendix C.1 of this Initial Study.*

Alison Martino recreating the famous Schulman angle (Freberg 2015)

Daytime version recreating the famous Schulman angle (La Carmina 2020)

Source: South Environment LLC, November 2022.

Figure 10
Stahl House Southwest Corner

Southwest corner showing more of the view below (La Carmina 2020)

View of the Stahl House southwest corner, facing downhill to Marlay Drive with red line defining the ridgeline above the project site. The steepness of the hillside makes it difficult to see much of the project site or the neighboring properties on Marlay Drive (South Environmental 2022)

Source: South Environment LLC, November 2022.

Figure 11
View from Southwest Corner of Stahl House

View from the Stahl House pool area, facing south (XJENN3 2015)

View from Stahl House pool area, facing downhill to Marlay Drive with red line defining the ridgeline above the project site (South Environmental 2022)

Source: South Environment LLC, November 2022.

Figure 12
View from Stahl House Pool Area

Daytime view from Stahl House living room, facing south (Bowers n.d.)

View from the Stahl House living room, facing downhill to Marlay Drive with red line defining the ridgeline above the project site (South Environmental 2022)

Source: South Environment LLC, November 2022.

Figure 13
View from Stahl House Living Room Area

As such, the Project would result in a less than significant impact with respect to views of a scenic vista.

Mitigation Measures

None required.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. A significant impact may occur only where scenic resources would be damaged or removed by the project.

The nearest State-designated scenic highway to the Project Site is State Route 110, known as Arroyo Seco Historic Parkway Scenic Byway between US Route 101 and its terminus in the City of Pasadena. The portion of State Route 110 between US Route 101 and its terminus in the City of Pasadena is an officially designated State scenic highway.[3] The Project Site is located approximately 8 miles west, as the crow flies, from the designated scenic highway portion of State Route 110. The Project would not alter in any way resources related to State Route 110.

In addition, Topanga Canyon State Scenic Highway is approximately 14 miles away from the Project Site and there will be no impacts to this State scenic highway from this Project.

There are also no City-designated scenic highways in the Project Site vicinity.[4] Therefore, the Project would not have an impact on scenic resources or historic buildings within a State scenic highway. Accordingly, no impact would occur and no mitigation measures are required.

Mitigation Measures

None required.

c) Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. A significant impact may occur if a project introduces incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site.

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[3] *California Department of Transportation, California Scenic Highway System Map, available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html, accessed August 2022.*

[4] *City of Los Angeles Department of City Planning, Mobility Plan 2035, Citywide General Plan Circulation System, Map A5 – Central, East and Cornfield Arroyo Secco Plan (CASP) Subarea, September 2016.*

The Project Site is located in an urbanized area of the City; therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

Zoning Consistency

The Project Site is zoned R1-1-HCR (One Family – Height District No. 1 – Hillside Construction Regulation Supplemental Use District). As discussed in detail in response to **Checklist Question XI(b)**, the Project would be consistent with the zoning for the Project Site, including the land use, lot size, RFA, height, and parking requirements, standards, and limits established in Chapter I, the Planning and Zoning Code and Section 12.21 C 10, the Hillside Ordinance (Ordinance No. 184,802).

The Project is requesting a Zoning Administrator's Determination for relief from the front yard setback. LAFD has determined that a turnaround is required in order to develop the property because of the location of the site at the terminus of a substandard hillside limited street. This turnaround would require a dedication of land between 2 feet and 19 feet 17.5 inches along the property frontage to create a turnaround on the substandard Marlay Drive at the terminus, adjacent to the proposed home. Because of this requirement, the Project Applicant is requesting a front yard setback below the prevailing front yard setback of 7.5 feet to accommodate the turn-around dedication of land. The Project would include a front yard setback between 2 inches and 19 feet 7.5 inches, after providing the required dedication of land.

The Project would provide side yard setbacks of 6 feet and a rear yard setback of 15 feet, consistent with the setback standards of the LAMC.

Therefore, with approval of the requested Zoning Administrators Adjustment for a reduced front yard setback to accommodate the required dedication of land, the Project would be consistent with the City's Planning and Zoning Code.

Other Scenic Quality Regulations

Community Plan

The Project Site is located within the boundaries of the Hollywood Community Plan. The Hollywood Community Plan (Community Plan) is one of the Community Plans that makes up the Land Use Element of the City of Los Angeles' General Plan. The Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work, and invest in the community. The Community Plan includes goals, objectives, and policies related to residential development; however, none of the policies for housing are related to scenic quality. In the absence of specific policies related to scenic quality, the Project can be evaluated related to general consistency with the Community Plan. The Project would result in a new single-family home where currently there is no development, and thus increased massing on a currently undeveloped parcel. However, the Project would be generally consistent with the viewshed of the surrounding area as the surrounding area is developed with single-family homes. The Project Site is zoned R1 for One-Family Zone and is surrounded by lots zoned for single-family residential

land uses (RE9 and R1). The Project would develop single-family residences consistent with the Site's current zoning and consistent with the existing single-family development in the surrounding area. As shown in Figure 8, Project Renderings, the Project home would be integrated into the Project Site topography by nestling the home into the hillside, with retaining walls on three sides integral with the structure of the home. Thus, the home's proposed placement and design would be consistent with the hillside topography of the site and area. Accordingly, the design of the home would not detract from the visual character or quality of the Site or surroundings.

Summary

Based on the above, the Project would be consistent with the zoning for the Project Site and the Hollywood Community Plan. As such, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. A significant impact may occur if a project introduces new sources of light or glare on the project site which would be incompatible with the areas surrounding the project site or which pose a safety hazard, such as to motorists utilizing adjacent streets.

Light

The Project is located in a developed area of the City where there are moderate levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures that passes through windows). Due to the nature of the surrounding environment, light emanating from any one source contributes to the overall lighting impacts rather than being solely responsible for lighting impacts on a particular use. As uses surrounding the Project Site are already impacted by lighting from existing development within the area, any additional amount of new light sources must be noticeably visible to light-sensitive uses to have any notable effect.

The Project would have the potential to alter lighting patterns in the area of the Project Site as compared with the existing undeveloped conditions. Night lighting for the Project would be provided to illuminate the home's driveway, entrance, and the improved portion of Marlay Drive. Although the amount of light emanating from the Project would represent an increase over current light levels, the Project would be designed to comply with LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the

windows and outdoor recreation/habitable areas of residential units from being illuminated by more than two foot-candles, or from receiving direct glare from the light source.[5]

It is anticipated that the amount of light emanating from the Project would represent an increase over current light levels. Even so, the Project's compliance with the City's regulatory compliance measures, including LAMC Sections 12.21 A.5(k) and 93.0117, would require outdoor lighting to be designed and installed with shielding so that the source of the light (e.g., the bulb) cannot be seen from adjacent residential properties, the public right-of-way, or from above so as to minimize light trespass. Therefore, the Project would not create a new source of substantial light that would adversely affect day or nighttime views in the area.

Glare

The Project would incorporate both solid and glass surfaces. Exterior building materials of the proposed building would use various non-reflective material designed to minimize the transmission of glare from the Project's buildings. The proposed home would all include a garage, thereby minimizing potential glare from vehicles. Furthermore, the Project's compliance with the City's existing regulations, including LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor recreation/habitable areas of residential units from being illuminated by more than two foot-candles, or from receiving direct glare from the light source, would ensure potential glare impacts are not significant. Moreover, the Project would not use polished metals in its design. As such, the Project would not create a new source of substantial glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

II. AGRICULTURE AND FOREST RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

[5] *Direct glare, as used in LAMC Section 93.0117, is a glare resulting from high luminance or insufficiently shielded light sources that is in the field of view.*

b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use.

According to the State Farmland Mapping and Monitoring Program's most recent Farmland mapping data for Los Angeles County, neither the Project Site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[6] Thus, Project implementation would not result in the loss of State-designated Farmland. Therefore, no impacts would occur, and no mitigation measures are required.

Mitigation Measures

None required.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

The Project Site is zoned R1-1-HCR (One Family – Height District No. 1 – Hillside Construction Regulation Supplemental Use District). The Project Site is not zoned for agricultural use, and there are no agricultural uses currently occurring at the Project Site or within the surrounding area. Additionally, according to the State's most recent Williamson Act land data, neither the Project

[6] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published July 2017.*

Site nor the surrounding area is under a Williamson Act contract.[7] Therefore, no impacts would occur, and no mitigation measures are required.

Mitigation Measures

None required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use.

In the City, forest land is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or timberland production. The Project Site is zoned R1-1-HCR (One Family – Height District No. 1 – Hillside Construction Regulation Supplemental Use District). The Project Site is not zoned for forest land, timberland, or timberland production land uses. Therefore, no impacts would occur, and no mitigation measures are required.

Mitigation Measures

None required.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. A significant impact may occur if a project results in the conversion of forest land to another, non-forest use.

The Project Site is located in an area of the City developed with single-family residential uses and zoned for single-family residential uses. No designated forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land to a non-forest use. Therefore, no impacts would occur, and no mitigation measures are required.

Mitigation Measures

None required.

[7] *State of California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, Los Angeles County Williamson Act Status Report 2018-2019, published October 2021.*

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use.

The Project Site is located in an urbanized area of the City developed with single-family residential uses and zoned for single-family residential uses. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site to non-agricultural or non-forest use. Therefore, no impact would occur, and no mitigation measures are required.

Mitigation Measures

None required.

III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Air Quality Management Plan

The Project Site is located within the South Coast Air Basin (SCAB or the "Air Basin"), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, as well as all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD administers the Air Basin's air quality management plan, which is a comprehensive document outlining an air pollution control program

for attaining the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted air quality management plan for the Air Basin is the 2022 Air Quality Management Plan (2022 AQMP), which was adopted December 2, 2022 by SCAQMD and adopted by the California Air Resources Board (CARB) on January 26, 2023.

The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies, such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions or low-NO_X technologies), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other measures to achieve national and state standards.

Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors.

For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities.[8] Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours.

The Project Site is located within an urbanized setting in the Hollywood Hills area of the City within the Hollywood Community Plan area. The surrounding area is characterized by single family residential uses and vacant undeveloped land, which are zoned R1-1-HCR and RE9-1-HCR. The property to the immediate north is a locally designated Historic-Cultural Monument listed on the California Register of Historical Resources and the National Register of Historic Places. The property to the west of the Project Site is Marmont Manor.

The closest sensitive receptors to the Project Site include: the single-family dwelling units located adjacent to the north of the Site, the single-family dwelling units located approximately 50 feet to the east of the Project Site and across Marlay Drive, approximately 20 feet from the Project Site, and the single-family dwelling units located approximately 100 feet south of the Project Site, north of Hollywood Boulevard. Other air quality sensitive land uses are located further from the Project Site and would experience lower impacts.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable air quality management plan or would in some way represent a

[8] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology (revised), 2008*

substantial hindrance to employing the policies or obtaining the goals of that plan. The air quality management plan that applies to the Project is SCAQMD's 2022 AQMP. Therefore, this section discusses any potential inconsistencies of the Project with the 2022 AQMP.

The purpose of a consistency finding with regard to an applicable air quality management plan is to determine if a proposed project is consistent with the assumptions and objectives of the 2022 AQMP and discuss whether the Project would interfere with the region's ability to comply with federal and state air quality standards. SCAQMD has established the following criteria for determining consistency with an applicable air quality management plan in Chapter 12, Sections 12.2 and 12.3 of their CEQA Air Quality Handbook:

1. Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2. Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criteria 1 – Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis (see thresholds (b) and (c) below), short-term construction impacts would not result in significant impacts based on the SCAQMD regional and local thresholds of significance. This analysis also found that long-term operations impacts would not result in significant impacts based on the SCAQMD local and regional thresholds of significance. Therefore, the Project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the 2022 AQMP under the first criterion.

Criteria 2 – Exceed Assumptions in the AQMP?

Consistency with the assumptions of an air quality management plan is primarily assessed by determining consistency between a project site's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, an applicable air quality management plan if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the applicable air quality management plan.[9] The 2022 AQMP integrates socioeconomic projections provided by the Southern California Association of Government (SCAG). Specifically, the 2022 AQMP forecasts the 2037 emissions inventories with growth based on SCAG's 2020-2045 Regional Transportation/Sustainable Communities Strategy (2020-2045 RTP/SCS). The growth forecasts contained within the 2020-2045 RTP/SCS are based on local general plans prepared for jurisdictions located within the SCAB. Therefore, projects that would develop land uses consistent with the site's land use designation established in an applicable general plan would

[9] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.*

generally be considered consistent with the growth assumptions of the underlying regional plans used to develop the applicable air quality management plan.

The Project Site is located within an urbanized setting in the Hollywood Hills area of the City within the Hollywood Community Plan area. The surrounding area is characterized by single family residential uses and vacant undeveloped land, which are zoned R1-1-HCR and RE9-1-HCR. The Project is a single-family residence, located on an infill lot that would be surrounded by existing residential development. The Project would be consistent with the existing R1-1-HRC zoning and the Community Plan designation of Low II Residential and the Project would be consistent with the permitted single-family use. In addition, as detailed in Section XIV, Population and Housing, the Project would not exceed the growth projections of SCAG's 2020-2045 RTP/SCS.

Because the Project would be consistent with the General Plan and the growth assumptions of the 2020-2045 RTP/SCS, it is assumed that the Project's emissions have been accounted for in the 2022 AQMP. Therefore, the Project would not exceed the assumptions for the Project Site in the applicable air quality management plan and is found to be consistent with the 2022 AQMP under the second criterion.

Based on the above, the Project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. A significant impact may occur if the project would add a considerable cumulative contribution to federal or State non-attainment pollutants.

Criteria pollutants include Ozone (O_3), Carbon Monoxide (CO), Nitrogen Dioxide (NO_2), Respirable Particulate Matter (PM_{10} and $PM_{2.5}$), Sulfur Oxides (SO_x), and lead. Currently, the Air Basin is a nonattainment area for the federal standards for O_3 and $PM_{2.5}$ and the state standards for O_3, PM_{10}, and $PM_{2.5}$.[10] The Los Angeles County portion of the Air Basin is also designated nonattainment for the federal standard for lead. Sources of lead emissions are ore and metals processing (e.g., lead smelters, leaded aviation gasoline combustion), waste incinerators, lead-acid battery manufacturing, etc. The Project would not include any such sources of lead emissions. Therefore, implementation of the Project would not result in substantial emissions of lead and this pollutant is not discussed further in this analysis.

[10] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, South Coast AQMD Air Quality Significance Thresholds, revised March 2023, https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25, accessed February 202.*

Air pollution is largely a cumulative impact. Because the SCAB is designated as a federal and/or state nonattainment air basin for O_3, PM_{10}, and $PM_{2.5}$, and the Los Angeles County portion is designated as nonattainment for lead, there is an on-going regional cumulative impact associated with these criteria pollutants. However, an individual project can emit these pollutants without significantly contributing to this cumulative impact depending on the magnitude of emissions. The SCAQMD has developed project-level significance thresholds for criteria pollutants, which are used to determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality impacts. If a project's emissions would exceed these thresholds, summarized below in **Table 1, SCAQMD Air Quality Significance Thresholds**, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

The Project would result in a cumulatively considerable net increase of criteria pollutants if its construction or operational emissions exceed the SCAQMD thresholds presented above in **Table 1**. It should be noted that because O_3 is not emitted directly and is, instead, formed from the reaction between its precursor gasses (VOCs and NO_X) and light and heat, the Project's potential to contribute to emissions of O_3 is evaluated with regard to its emissions of VOCs and NO_X as O_3.

The Project's construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.[11] The following analysis quantitatively evaluates the estimated Project-generated emissions against the SCAQMD emissions thresholds.

Table 1
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
NO_x	100 pounds/day	55 pounds/day
VOC [a]	75 pounds/day	55 pounds/day
PM_{10}	150 pounds/day	150 pounds/day
$PM_{2.5}$	55 pounds/day	55 pounds/day
SO_x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	

[11] *South Coast Air Quality Management District, California Emissions Estimator Model.*

Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402
GHG	10,000 MT/yr CO2eq for industrial facilities
Ambient Air Quality for Criteria Pollutants [b]	
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)
PM_{10} 24-hour average Annual average	 10.4 µg/m^3 (construction) [c] & 2.5 µg/m^3 (operation) 1.0 µg/m^3
$PM_{2.5}$ 24-hour average	 10.4 µg/m^3 (construction) [c] & 2.5 µg/m^3 (operation)
Sulfate 24-hour average	 25 µg/m^3 (state)
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter

a The definition of VOC includes ROG compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.

b Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, table A-2 unless otherwise stated.

c Ambient air quality threshold based on SCAQMD Rule 403.

Source: South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, South Coast AQMD Air Quality Significance Thresholds, revised March 2023.

Short-Term (Construction) Emissions

Construction of the Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, and VOC off-gassing from architectural coatings and asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$. Construction emissions can vary substantially from day to day depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

Construction would involve preparation of a 0.11-acre site and development of a 3,100-square-foot single-family structure, and would require hauling 2,991 cubic yards of soil export. Emissions from the construction phase of the Project were estimated using a project-specific construction schedule provided by the Applicant and CalEEMod default assumptions for equipment and vehicle fleets. For the purpose of conservatively estimating Project emissions, construction was modeled beginning in July 2026 and concluding in September 2028, for a total of 26 months of

construction.[12] The analysis contained herein is based on the following schedule assumptions (duration of phases is approximate):

- Site Preparation/Excavation: 29 work days (Month 1)
- Grading: 45 work days (Month 2 through Month 3)
- Foundation and Building Construction: 495 work days (Month 4 through Month 26)
- Architectural Coating: 60 work days (Month 23 through Month 26)

Data utilized by CalEEMod default assumptions regarding equipment and vehicle fleets, including mix, horsepower, and load factors, is provided by CARB's EMFAC and OFFROAD databases. It was assumed that heavy-duty construction equipment would be operating at the Site 5 days per week. Detailed construction equipment lists, construction scheduling, and emission calculations are available in the CalEEMod Output provided in **Appendix A** of this document.

Emissions generated during construction (and operation) of the Project would be subject to the rules and regulations of the SCAQMD. Rule 403, Fugitive Dust, requires the implementation of measures to control the emission of visible fugitive/nuisance dust, such as wetting soils that would be disturbed. It was assumed that the active sites would be watered at least two times daily in compliance with requirements of SCAQMD standard dust control measures in Rule 403. The application of architectural coatings, such as exterior/interior paint and other finishes, and the application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings that comply with the requirements of SCAQMD's Rule 1113, Architectural Coatings.[13]

The estimated maximum daily construction emissions are summarized in **Table 2, Construction-Related Regional Pollutant Emissions**. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of project construction. The maximum daily emissions are compared to the SCAQMD daily regional numeric indicators. Detailed construction model outputs are presented in **Appendix A** to this document.

Table 2
Construction-Related Regional Pollutant Emissions

	Pollutant Emissions (pounds/day) [1]					
Emissions Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions [2, 3]	1.17	9.93	11.0	0.02	2.75	1.46
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

[12] *A July 2026 construction start date represents the earliest date that construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emissions factors for later years decrease due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.*

[13] *SCAQMD Rule 1113, Architectural Coatings, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by pacing limits on the VOC content of various coating categories.*

Table 2
Construction-Related Regional Pollutant Emissions

Emissions Source	Pollutant Emissions (pounds/day) [1]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$

ROG = reactive organic gasses (for the purposes of this evaluation, VOC and ROG will be considered synonymous); NO_X = oxides of nitrogen; CO= carbon monoxide; SO_X = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

*1 The values shown are the maximum summer or winter daily emissions from the Project's CalEEMod report (See **Appendix A**).*

2 Includes both on-site and off-site emissions. On-site emissions from equipment operated on-site that is not operated on public roads. Grading/excavation PM_{10} and $PM_{2.5}$ emissions include compliance with SCAQMD Rule 403.

3 Construction and painting phases may overlap.

*Source: CalEEMod Version 2022.1, 1501 Marlay Drive Detailed Report, February 26, 2025. See **Appendix A**.*

As shown in **Table 2, Construction-Related Regional Pollutant Emissions**, the maximum emissions resulting from the Project construction would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Thus, a less than significant impact would occur for Project-related construction-source emissions. No mitigation measures are required.

Long-Term (Operational) Emissions

The Project would operate a 3,100-square-foot single-family residence and would include 309 square feet of landscaping. Operation of the Project would be expected to generate air emissions from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. Rule 1113 (Architectural Coatings) limits paints applied to buildings to 50g/L VOC content. CalEEMod default values were assumed, including the surface area to be painted, the VOC content of architectural coatings, and the reapplication rate of 10 percent of area per year.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. Consumer product VOC emissions were estimated in

CalEEMod based on the floor area of buildings and default factor of pounds of VOC per building square foot per day. The CalEEMod default values for consumer products were assumed.

Fireplaces

The Project is one single-family dwelling unit; however, the future occupant may install outdoor gas appliances (e.g., a barbeque, or fire pit) that may be used. To be conservative, the CalEEMod default for gas 90 percent of dwelling units with gas fireplaces was retained.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape equipment use were estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered.

Mobile Source Emissions

Vehicles

Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the vicinity of the Project. The Project-related operational air quality impacts are derived primarily from vehicle trips generated by the Project. As there was no traffic study required for this Project, CalEEMod default trip generation rates for a single-family dwelling use were used.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

Operational Emissions Summary

The potential operations-related air emissions have been analyzed below for the criteria pollutants and cumulative impacts. The levels of criteria pollutant emissions that would be generated by the

Project's long-term operations have been calculated and the worst-case (i.e., highest) value emissions that would be generated under either summer or winter conditions are shown below in **Table 3, Regional Operational Pollutant Emissions.**

Table 3
Regional Operational Pollutant Emissions

	Pollutant Emissions (pounds/day) [1]					
Operational Activities	**VOC**	**NOx**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions	0.37	0.06	0.80	<0.005	0.13	0.09
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

ROG = reactive organic gasses (for the purposes of this evaluation, VOC and ROG will be considered synonymous); NO_X = oxides of nitrogen; CO= carbon monoxide; SO_X = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

*1 The values shown are the maximum summer or winter daily emissions from the Project's CalEEMod report (See **Appendix A**).*

*Source: CalEEMod Version 2022.1, 1501 Marlay Drive Detailed Report, February 26, 2025. See **Appendix A**.*

The results from **Table 3, Regional Operational Pollutant Emissions,** show that none of the SCAQMD regional emissions thresholds would be exceeded. Therefore, a less than significant regional air quality impact would occur from operation of the Project. No mitigation measures are required.

Cumulative Air Quality Impacts

There are a number of cumulative projects in the project area that have not yet been built or are currently under construction. Since the timing or sequencing of the cumulative projects is unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. Further, cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. The SCAQMD recommends using two different methodologies: (1) that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality;[14] and (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

The Project area is out of attainment for O_3, PM_{10}, and $PM_{2.5}$. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the SCAB. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic volumes from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects

[14] *South Coast Air Quality Management District, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.*

that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact.

In summary, as shown above in **Table 3, Regional Operational Pollutant Emissions,** Project operations would generate emissions of NO_X, ROG, CO, PM_{10}, and $PM_{2.5}$, which would not exceed the SCAQMD regional thresholds and would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Therefore, the Project would not **result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.**

Mitigation Measures

None required.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Short-Term (Construction) Localized Emissions

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as localized significance thresholds (LSTs).

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards. In the case of CO and NO_2, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$; both of which are non-attainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). SCAQMD's Methodology clearly states that "off-site mobile emissions from the Project should

NOT be included in the emissions compared to LSTs."[15] Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The CalEEMod output in **Appendix A** of this document show the equipment used for this analysis.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in LST Methodology prepared by SCAQMD (revised July 2008). The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ from the Project could result in a significant impact to the local air quality. The emission thresholds were calculated based on the Central Los Angeles source receptor area (SRA) 1 and a disturbance value of one acre per day (as the Project Site is approximately 0.11-acre).

According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The nearest sensitive receptors to the Project Site include: the single-family dwelling units located adjacent to the north of the Site, the single-family dwelling units located approximately 50 feet east of the Project Site and across Marlay Drive, approximately 20 feet from the Project Site, and the single-family dwelling units located approximately 100 feet south of the Project Site, north of Hollywood Boulevard. Other air quality sensitive land uses are located further from the Project Site and would experience lower impacts. **Table 4, Local Construction Emissions at the Nearest Receptors** shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds.

Table 4
Local Construction Emissions at the Nearest Receptors

Activity	On-Site Pollutant Emissions (pounds/day)			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions	9.19	9.84	2.49	1.39
SCAQMD Thresholds [1]	*74*	*680*	*5*	*3*
Exceeds Threshold?	**No**	**No**	**No**	**No**

1 The nearest sensitive receptors to the project include: the single-family dwelling units located adjacent to the north of the Site, the single-family dwelling units located approximately 50 to the east of the Project Site and across Marlay Drive, approximately 20 feet from the Project Site, and the single-family dwelling units located approximately 100 feet south of the Project Site, north of Hollywood Boulevard. Other air quality sensitive land uses are located further from the Project Site and would experience lower impacts; therefore, the 25-meter threshold was used.

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 1 acre at a distance of 25 m in SRA 1 (Central Los Angeles).

The data provided in **Table 4**, **Local Construction Emissions at the Nearest Receptors,** shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would occur from construction of the Project. No mitigation measures are required.

[15] *South Coast Air Quality Management District, Final Localized Significance Thresholds Methodology, 2003 (Revised July 2008).*

Construction-Related Toxic Air Contaminants (TACs)

With respect to TACs, the greatest potential for TAC emissions resulting from construction of the Project would involve diesel particulate emissions associated with trucks and heavy equipment. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs over a 70-year lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction TAC emissions. Given the temporary and short-term construction schedule (approximately 26 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of Project construction. Furthermore, as shown above, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds.

In addition, the construction activities associated with the Project would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and Federal level that would protect sensitive receptors from substantial concentrations of these emissions. The Project would be consistent with applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five (5) minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the excavation activities.

Long-Term (Operational) Localized Emissions

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, onsite usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the state and federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The Project involves the construction and operation of a single-family residential use. However, due the lack of on-site/stationary source emissions, no long-term localized significance threshold analysis is warranted.

CO Hot Spots

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the state and federal CO standards, which were presented above.

To determine if the proposed Project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general Project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority evaluated the Level of Service in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level of Service E during the morning peak hour and Level of Service F during the afternoon peak hour.

The Project proposes the construction and operation of a single-family dwelling and did not meet the minimum threshold to require any kind of traffic study. Per the CalEEMod output, the default trip generation rate is 9.44 trips per weekday. Therefore, as the Project is not anticipated to generate a significant number of trips, the traffic volume would fall far short of 100,000 vehicles per day. No CO "hot spot" modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

Therefore, the Project will not expose sensitive receptors to substantial pollutant concentrations. Impacts are less than significant.

Mitigation Measures

None required.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes.

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project involves the construction and operation of a single-family residential home, which is not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the Project. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore should not reach an objectionable level at the nearest sensitive receptors. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant and no mitigation is required.

Mitigation Measures

None required.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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Mitigation Measures

None required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

The following analysis incorporates the findings of the *Biological Resources Report,* prepared by South Environmental, dated August 2025 ("Biological Resources Report"). The following analysis also incorporates the findings of the tree surveys conducted by Paul A. Lewis, Landscape Architect, dated July 6, 2018, March 10, 2022, and June 30, 2025 ("Tree Letters"). The Biological Resources Report and Tree Letters are available as **Appendix B** to this Initial Study, (B.1 and B.2, respectively).

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A significant impact may occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited.

The Biological Resources Report (Appendix B.1) identifies and assesses the potential impacts to sensitive or protected biological resources on the Project Site and within a 200-foot buffer study area, indicates the regulations governing these resources, and discusses recommendations for avoiding or mitigating these impacts. A 200-foot buffer is used because the fuel modification zone required by the Los Angeles Fire Department extends 200 feet from proposed buildings, and a 200-foot buffer from the Project Site edge contains this area. The biological resources of the Project Site were assessed based on a literature review and a field site survey as further discussed below and in Appendix B.1.

Flora

Flora Literature Review

The Vegetation Classification of the Santa Monica Mountains and Environs in Ventura and Los Angeles Counties California (California Department of Fish and Game [CDFG], California Native Plant Society [CNPS] 2006) was reviewed to identify the plant communities known to occur in and near the study area. The California Department of Fish and Wildlife (CDFW) California Natural Diversity Database online (CDFW 2025a) was reviewed to identify special-status plants that have previously been recorded in the United States Geological Survey (USGS) Hollywood 7.5" quad that the Project Site is located within, and the eight surrounding USGS 7.5" quads: Los Angeles, South Gate, Inglewood, Venice, Beverly Hills, Van Nuys, Burbank, and Pasadena. Additional resources that were used in the review include Inventory of Rare and Endangered Plants of California online (CNPS 2025b) and Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC; USFWS 2025).

Flora Field Methodology

South Environmental conducted a field reconnaissance of 1501 Marlay Drive to identify biological resources, including plant communities and plant species. A 200-ft radius from the Project Site was drawn in ARC GIS to clearly delineate the Project Site and surrounding buffer study area. Sufficient time was allotted to collect data on the most prevalent plant species present on the Project Site and the overall survey area. The most important plants were observed and recorded on the survey area and identified to species except for species that could not be identified because of condition (dried out), lack of floral parts, or lack of access to an area (e.g., private property). Plant communities were identified according to Vegetation Classification of the Santa Monica Mountains National Recreation Area and Environs in Ventura and Los Angeles Counties California (CDFG, CNPS 2006) and mapped in ARC GIS.

When applicable, the field surveys complied with the Survey of California Vegetation (SCV) Classification and Mapping Standards (CDFW 2025d) and the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2025e). Species that could not be identified in the field were identified with digital photos and plant specimens using the Jepson Manual Vascular Plants of California (Baldwin et al., 2012) and other botanical sources.

The survey for biological resources including plant communities and plant species at 1501 Marlay Drive was conducted on July 8, 2025, by South Environmental and found the study area is made up of two plant communities: Fountain Grass Swards (Pennisetum setaceum Herbaceous Semi-Natural Alliance) and Non-Native Pinus Species Woodland including maritime pine (Pinus pinaster) and longleaf pine (Pinus paulustris), and one land cover type: Developed/Ornamental Land Cover including small Philippine acacia (Acacia confusa), candelabra aloe (Aloe arborescens), Norfolk Island Pine (Araucaria heterophylla), asparagus fern (Asparagus aethiopicus), jade plant (Crassula ovata), Italian cypress (Cupressus sempervirens), brush cherry (Syzgium panticulatum), star jasmine (Trachelospermum jasminoides), and Chinese elm (Ulmus parvifolia).

Special-Status Plants

According to the literature analysis (see Appendix B.1), there are 69 special-status plants known to occur in the region. The literature analysis includes CNDDB, CNPS, IPAC, and California Rare Plant Rank (CRPR) species with a classification of 1-4. Due to a high level of disturbance from non-native plants and/or non-native ornamental plants, the Developed / Ornamental Landscaped land cover, the Fountain Grass Swards, and the Non-Native Ornamental Woodland within the study area all do not have the capability to support special-status species plants. The study area is not designated Critical Habitat for any plant species (USFWS 2025b). No special-status plants were observed in the study area; moreover, based on the literature analyses, no special-status plants have the potential to occur within the study area or Project Site.

Sensitive Natural Communities

CDFW 2018 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities defines sensitive natural communities as those that are "of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects." CDFW has determined that a natural community is sensitive if it has a Global or State rarity rank of 1-3, which includes communities that are vulnerable (G3/S3), imperiled (G2/S2), and critically imperiled (G1/S1). CDFW uses the alliances and groups described in the Manual of California Vegetation Online to characterize California's natural communities and provides the California Natural Communities List online (most current is dated September 9, 2020) to list the current global and state rarity rank for each natural community characterized in the Manual.

None of the plant communities or land cover on the study area have a Global or State rarity rank of 1-3; as a result, each is not considered a sensitive natural community by the CDFW.

Protected Trees

The City of Los Angeles Municipal Code (LAMC) states that protected tree species are defined as any of the following southern California native trees or shrubs:

- Oaks, or any other tree of the Quercus genus indigenous to California, except the scrub oak (Quercus dumosa)
- Southern California black walnut (Juglans californica var. californica)
- Western sycamore
- California bay (Umbellularia californica)
- Blue elderberry
- Toyon

Protected tree or shrub species that measure four inches (4") or more in cumulative diameter at four- and one-half feet (4 ½') above the grade at the base of the tree fall into the category of a protected tree.

No LAMC protected trees were observed on the Project Site; moreover, no LAMC protected trees were observed within the study area.

Flora Impact Summary

The proposed construction footprint will be on 0.06-acre of Fountain Grass Swards, which is a disturbed, invasive, and non-sensitive plant community found on a highly erosional slope. A Non-Native Ornamental Woodland that is disturbed and non-sensitive is adjacent to the west of the proposed construction footprint and Developed / Ornamental Landscaped land cover is adjacent in all other directions relative to the proposed construction footprint. As a result, the Project and associated construction activities would not affect native plant communities or sensitive plant communities either on the Project Site or adjacent to the Project Site.

No special-status plants were observed in the study area or Project Site. Due to the on-going practice of fuel modification and brush clearing, an abundance of non-native plants, and a highly erosional surface, none were determined to have the potential to occur within the Project Site. Therefore, special-status species plants would not be affected by the proposed development.

No LAMC protected trees were observed in the study area or Project Site and they are considered absent from the study area and Project Site.

Wildlife

Wildlife Literature Review

South Environmental's assessment of the wildlife of the study area began with a review of literature relating to the fauna that is known to occur near the study area. The CDFW California Natural Diversity Database online (CDFW 2025a) was reviewed to identify special-status animals that have been previously recorded in the United States Geological Survey (USGS) Hollywood 7.5" quad that the project site is located within, and the eight surrounding USGS 7.5" quads: Los Angeles, South Gate, Inglewood, Venice, Beverly Hills, Van Nuys, Burbank, and Pasadena. Additional resources that were included in the review include United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC) (USFWS 2025a), CDFW California Wildlife Habitat Relationships (CWHR) life history accounts and range maps online (CDFW 2025b), and Bird species protected by the Migratory Bird Treaty Act (MBTA).

Wildlife Field Methodology

South Environmental conducted a field visit of 1501 Marlay Drive to identify any biological resources present including endangered and threatened wildlife. A 200-ft radius from the Project Site was drawn in ARCGIS to clearly delineate the Project Site and surrounding buffer survey area. Data was collected on the most prevalent animals present on the Project Site and the overall survey area.

Wildlife including mammals, reptiles, amphibians, and birds was observed and recorded on the survey area and identified to species. Animals were detected and identified via direct sighting, scat, calls, or based on discussion with people living in the area. Direct sightings of animals were with the naked eye or with binoculars when necessary. Binoculars were used to try and view wildlife in private areas where access was prohibited. Since wildlife moves swiftly, observation time of the animal was limited in some cases. In these instances, identification of wildlife at the taxonomic level of species was not always possible and the wildlife was identified at the level of genus or animal group (e.g., hummingbird). When a special-status animal was detected, habitat conditions were documented including characterization of the animal's associated vegetative community and abiotic factors (e.g., soils).

Specific survey protocols for mountain lions, monarch butterfly, and bats were conducted during the field survey and are explained in the Biologist Statement of Required Review Completion and Biological Reporting Standardized Requirements of the City of Los Angeles (2022). These are summarized as follows:

Mountain lion: Specific measures were taken to assess the potential for mountain lions on the study area. The study area was surveyed for suitable habitat for mountain lion dens entailing a search for thickets, caves, or rocky areas with large natural cavities. Signs of mountain lion presence were searched for including scat and tracks. The potential for mule deer — a common animal preyed on by the mountain lion — habitat on the site, was considered. And the connectivity of the study area through a wildlife corridor to high-quality habitat and human presence in the area were also considered.

Monarch Butterfly: Specific measures were taken to assess the potential for monarch butterflies to overwinter or breed on the study area. To assess the potential for the study area to be used as an overwinter habitat, the proximity of the study area to coastline and freshwater resources and the presence of large-protected trees were the main considerations. For monarch use as breeding habitat, the study area was assessed for milkweed presence.

Bats: Specific measures were also taken to assess the potential for special-status bats on the study area. The study area was assessed for appropriate habitat for bats which includes large trees, cliff faces, rock outcroppings, and structure overhangs. Evidence of bat presence was also considered by searching for signs of dead bats, bat urine and guano. Finally, the study area was assessed in terms of whether the habitat of the site or adjacent parcels included foraging areas or water sources.

Wildlife Observed

During the field visit, one common urban species known to inhabit the Los Angeles area was observed in the study area: western fence lizard (Sceloporus occidentalis). No mammals or amphibians were observed. It is likely that other common urban animals, for example, fox squirrel (Sciurus niger), racoon (Procyon lotor), Anna's hummingbird (Calypte anna), house sparrow (Passer domesticus), and California towhee (Melozone crissalis) also inhabit or migrate through the site, as well as others.

Special-Status Wildlife

No special-status animals were observed during the field visit and according to the literature analysis using the CNDDB database and presented in Appendix B.1, there are 57 special-status animals known to occur in the region. The literature analysis includes CNDDB and IPAC. Due to a 1.) a high level of disturbance from non-native plants and/or non-native ornamental plants and 2.) disturbance form urban movement and sounds, the Developed / Ornamental Landscaped land cover, the Fountain Grass Swards, and the Non-Native Ornamental Woodland within the study area all do not have the capability to support special-status species animals. The study area is not designated Critical Habitat for any animal species (USFWS 2025b). No special-status animals were observed in the study area; moreover, based on the literature analyses (see Appendix B), no special-status animals have the potential to occur within the study area or Project Site.

Special-status bats. Bats require roosting areas near foraging sites and a permanent water source. The eastern study area has a Non-Native Pinus Species Woodland, but the area includes disturbance from urban movement and sounds. As a result, the Non-Native Ornamental

Woodland would not be a suitable roosting site; additionally, the area lacks a permanent water source. Also, there were no signs of bat presence, for example, guano deposits or urine stains observed on the Project Site or impact areas. As a result, the Project Site would not be a habitat for roosting special-status bats. Low potential to occur.

Mountain lion (Puma concolor). The population of mountain lions in the Santa Monica Mountains is a candidate for listing as threatened under the California Endangered Species Act. Therefore, it is afforded the same protection as a listed species. Mountain lions are known to occur in large, contiguous tracts of woodlands, chaparral, coastal scrub, and riparian areas, and requires dense cover for predation and denning (e.g., rocky outcrops, dense vegetation, caves). The habitat on the Project Site is assessed as low quality for mountain lion since mountain lion would avoid it based of the site's lack of dense cover and large prey, fragmentation, proximity to development, human noise and movement, and lack of movement corridors/linkages. Disturbed areas with ruderal vegetation and landscaping are not considered habitat for mountain lions as they are found in native shrublands and woodlands with dense cover, which does not occur on the Project Site. It is very likely that mountain lion would avoid the Project Site. The development would not impact any habitat for mountain lion directly and no new fuel modification is proposed by the Project as it is entirely within 200-feet of existing homes and the area is already subject to fuel modification.

The difficulty of mountain lions to access the Project Site because of urban development reduces the likelihood that they would be there to hunt or for movement, as the Project Site is embedded within dense urban development in all directions. Ultimately, the study area and the Project Site do not form part of a large expanse of undeveloped mountain lion habitat that the species requires for denning and breeding. The Project Site and adjacent areas lack breeding and denning habitat characterized as dense brush, caves, natural cavities, and rock outcrops. Mountain lion would not migrate on to the study area via a habitat corridor because the study area has no direct connection to a large area that mountain lion may inhabit, for example, western areas of the SMMNRA. Barriers such as houses, and paved roads occur between the nearest large expanse of open space (Oakden – Laurel Canyon MRCA Open Space) that occurs 0.5-miles away and the lack of a direct connection to this area limits the potential for mountain lions to move through the vicinity of the Project Site. Therefore, mountain lions would not use the Project Site or surrounding areas as a movement corridor or habitat linkage. No potential to occur.

Monarch butterfly (Danaus plexippus). The species is a candidate for federal listing. According to the CNDDB, the species' "winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico", with "roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby." Additionally, for breeding the monarch butterfly requires milkweed plants (Asclepias species) for nutrition and hosting cocoons. The study area lacks suitable habitat for this species. Also, it is located over one mile from the coast and therefore does not provide overwintering habitat. No milkweed was observed and therefore it does not provide breeding habitat. No potential to occur.

Migratory Birds. There is the potential for migratory Birds of Conservation Concern (BCC), a designation based on the U.S. Fish and Wildlife Service criteria, to use the site for foraging, cover,

or even nesting (USFWS – IPAC 2025a). While they are migratory in nature, some of these species are also year-round residents in southern California. These species either are not considered rare by the CDFW and therefore are not included in the CNDDB Rarefind database, or they have not been observed within the eight quads that were used as part of the CNDDB query. The following birds considered to be migratory BCC could potentially use the study area:

- Allen's hummingbird (*Selasphorous sasin*)
- Belding's Savanna Sparrow (*Passerculus sandwichensis beldingi*)
- Bullock's oriole (*Icterus bullockii*)
- California thrasher (*Toxostoma redivivum*)
- Cassin's finch (*Haemohous cassinii*)
- Lawrence's goldfinch (*Carduelis lawrencei*)
- Nuttall's woodpecker (*Picoides nuttallii*)
- oak titmouse (*Baeolophus inornatus*)
- olive-sided flycatcher (*Contopus cooperi*)
- Santa Barbara song sparrow (*Melospiza melodia graminea*)
- Wrentit (*Chamaea fasciata*)

Wildlife Impact Summary

The proposed construction footprint will be on 0.06-acre of Fountain Grass Swards, which is a disturbed, non-native, and non-sensitive plant community found on a highly erosional slope. A disturbed, non-native, and non-sensitive Non-Native Ornamental Woodland is adjacent to the west of the proposed construction footprint and Developed / Ornamental Landscaped land cover is adjacent in all other directions relative to the Project Site. As a result, the proposed development and any associated construction activities would not affect native plant communities or sensitive plant communities that would be considered habitat for special-status species either on the Project Site or adjacent to the Project Site because none occurs. Therefore, no impacts to wildlife habitat would occur from the Project.

As described above, the study area is not suitable for roosting bats due to a lack of suitable roosting sites, lacks a permanent water source, disturbance form urban movement and sounds, the proximity to existing developments, and the lack of a nearby water source. Therefore, the Project would not result in impacts to special-status bats (direct or indirect) because their roosts are absent from the area and any activity other than roosting would occur at least beyond the study area.

Mountain lions would not breed, travel, forage, or den in the study area (or Project Site); therefore, no direct impacts to the species, or their habitat would result from the Project.

Because the site is at a distance (>1-mile) from the coast it would not be used for overwintering. And because no milkweed was observed in the study area, it would not be used as breeding habitat. Therefore, the Project would have no impact on the monarch butterfly, direct or indirect, as it is absent from the area.

Many common birds and migratory BCC have the potential to nest on the Project Site. The Project would require the removal of trees/shrubs that could provide potential nesting habitat for birds protected by the MBTA, MBPA, and the Fish and Game Code. If present at the time of vegetation removal, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. In addition, indirect impacts from noise or vibration have the potential to disturb an active bird nest to the point of failure if the nest is within immediate proximity to Project activities, and this would also be a violation of the MBTA and Fish and Game Code. To avoid impacts to active bird nests, eggs, or young, preconstruction nesting bird surveys and monitoring is required per the MBTA and MBPA as described below. This Regulatory Compliance Measure (RCM) **BIO-1** is to ensure compliance with the MBTA, MBPA, and Fish and Game Code and is not intended to reduce any impacts per the CEQA thresholds.

RCM BIO-1 If possible, ground disturbing activities and vegetation removal (including tree trimming) should be timed to occur outside the bird nesting season (September 1 – January 31).

If ground disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (February 1 – August 31) a preconstruction survey for nesting birds should be conducted within 72 hours prior to construction activities. The survey should be conducted by a qualified biologist with prior experience conducting nesting bird surveys for construction projects. The study area should include the Project Site and suitable habitat within a 300-foot buffer, or a buffer size determined by the qualified biologist based on level of proposed disturbance and access. If no active nests are found, no additional measures are required.

If active nests are found the biologist will map the location and document the species and nesting stage. A no-work buffer will be established around the active nest as determined by the qualified biologist and based on the species sensitivity to disturbance and the type and duration of the disturbance. No construction activities shall occur within the no-work buffer until the biologist has determined the nest is no longer active.

No special-status animals were observed in the study area or Project Site. Due to the on-going practice of fuel modification brush clearing, an abundance of non-native plants, a highly erosional surface, and disturbance from urban development, none were determined to have the potential to occur within the Project Site. Therefore, special-status species animals would not be impacted by the Project.

Regulatory Compliance Measures

RCM BIO-1 If possible, ground disturbing activities and vegetation removal (including tree trimming) should be timed to occur outside the bird nesting season (September 1 – January 31).

If ground disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (February 1 – August 31) a preconstruction survey for nesting birds should be conducted within 72 hours prior to construction activities. The survey should be conducted by a qualified biologist with prior experience conducting nesting bird surveys for construction projects. The study area should include the Project Site and suitable habitat within a 300-foot buffer, or a buffer size determined by the qualified biologist based on level of proposed disturbance and access. If no active nests are found, no additional measures are required.

If active nests are found the biologist will map the location and document the species and nesting stage. A no-work buffer will be established around the active nest as determined by the qualified biologist and based on the species sensitivity to disturbance and the type and duration of the disturbance. No construction activities shall occur within the no-work buffer until the biologist has determined the nest is no longer active.

Mitigation Measures

None required.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A significant impact may occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation.

No riparian or other sensitive natural communities exists on the Project Site or in the surrounding area.[16] Furthermore, the Project Site and surroundings are not located in or adjacent to a Significant Ecological Area as defined by the County of Los Angeles.[17] In addition, there are no other sensitive natural communities identified by the CDFW or USFWS.[18,19] Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. Therefore, impacts would be less than significant, and no mitigation measures are required.

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16 *South Environmental Consulting, Biological Resources Report for 1501 Marlay Drive, August 2025. See Appendix B.1 of this Initial Study.*

17 *Los Angeles County, Significant Ecological Areas Map, website: http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed: August 2025.*

18 *California Department of Fish and Wildlife, CDFQ Lands, website: https://apps.wildlife.ca.gov/lands/, accessed: August 2025.*

19 *United States Fish and Wildlife Service, National Wetlands Inventory, website: https://www.fws.gov/wetlands/data/Mapper.html, accessed: August 2025.*

Mitigation Measures

None required.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. A significant impact may occur if state or federally protected wetlands are modified or removed without adequate mitigation.

Review of the National Wetlands Inventory and the State of California Wetlands identified no protected wetlands in the vicinity of the Project Site.[20,21] Therefore, the Project Site would not have an adverse effect on federally protected wetlands. As such, no impacts would occur, and no mitigation measures are required.

Mitigation Measures

None required.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant. A significant impact may occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites.

Wildlife Movement Literature Review

South Environmental's assessment of the potential for wildlife movement to and from the Project Site consisted of consulting the following resources:

- United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC) (USFWS 2025a)
- USFWS Designated and Proposed Critical Habitat GIS data online (USFWS 2025b)
- GreenInfo Network, Park Information online (2025)
- California Protected Areas Database Map online (CPAD 2025)
- South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion (SC Wildlands 2006)

[20] *United States Fish and Wildlife Service, National Wetlands Inventory, website: https://www.fws.gov/wetlands/data/Mapper.html, accessed: August 2025.*

[21] *California EcoAtlas, South Coast region, website: https://www.ecoatlas.org/regions/ecoregion/south-coast, accessed: August 2025.*

Aerial photographs were used to assess the level of connectivity of habitat to the Project Site. The foremost considerations were whether there was a direct connection of high-quality habitat to the site — without interference from development — and whether the connecting habitat is linked to large habitat tracts.

Wildlife Movement Field Methodology

During the South Environmental field visit the Project Site and surrounding 200-ft survey area were assessed for their potential use as a wildlife corridor or habitat linkage. The level of disturbance of the site and surrounding areas are by way of existing development that includes roads, houses and commercial structures, fences, and lighting. The survey area was assessed for the presence of a corridor of linkage of habitat that connects the project site to adjacent higher-quality habitat.

Wildlife Movement Data Analysis

The Project Site is not within designated Critical Habitat for any threatened or endangered species (USFWS 2025a, 2025b). The Project Site is within the Santa Monica Mountains Conservancy Eastern Santa Monica Mountains Habitat Linkage Planning Map and is within Habitat Block 57. Habitat Block 57 includes the Non-Native Pinus Species Woodland that is within the western study area and the disturbed Fountain Grass Swards on the Project Site. Each of these communities are adjacent to both developed and disturbed areas. Habitat Block 57 is adjacent to Habitat Block 58 to the west, adjacent to Habitat Block 56 to the northeast, and is linked to Habitat Block 57-A by a wildlife corridor to the north.

A Non-Native Ornamental Woodland is within the western study area and a disturbed Fountain Grass Swards on the Project Site. Large wildlife would likely avoid these areas due to an abundance of human development within the study area and a plethora of human disturbances that would be encountered to reach the southern portion of Habitat Block 57.

With the intact Non-Native Pinus Species Woodland, it is possible that avian and bat species utilize the woodland for foraging or perching when moving through the area. As a result, the Non-Native Pinus Species Woodland in the western study area does provide a limited/minimal amount of movement opportunity for bat an avian species. However, the Project would occur on disturbed Fountain Grass Swards on a highly erosional slope that lacks tree species. Areas for staging, construction practices, or grading would be away from the Non-Native Ornamental Woodland. Therefore, foraging or perching when moving through the area would not occur in places where construction activities would take place for the Project.

Due to the lack of high-quality native habitats and the fragmented nature of the proposed development area on the Project Site (i.e. bordered mostly by developments and disturbances), the proposed development area is not considered a wildlife movement area, while the nearby undeveloped Non-Native Ornamental Woodland would provide some minor movement opportunities for smaller wildlife, it is not a significant movement area and would not be impacted by the Project.

Wildlife Movement Project Impacts

The project development area and associated construction activities would be within areas that are currently developed with roads, disturbed by fuel modification, or on a highly erosional slope. No impacts to native habitats are proposed and the Project would not have any impacts to movement areas because they do not occur in the proposed construction area. Fencing already separates the Fountain Grass Swards on the site from the majority of the Non-Native Ornamental Woodland west of the Project Site, and fencing is already in place for erosion control along the southern border of the Project Site. No fencing or lighting is proposed within any native habitats or movement areas and all developments would be within previously developed or disturbed areas. No new fuel modification is proposed, and no indirect impacts would occur as a result. Therefore, the Project would have no impact to wildlife movement areas.

As discussed above, common birds and migratory BCC have the potential to nest on the Project Site. The Project would require the removal of trees/shrubs that could provide potential nesting habitat for birds protected by the MBTA, MBPA, and the Fish and Game Code. If present at the time of vegetation removal, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA, MBPA, and the Fish and Game Code. In addition, indirect impacts from noise or vibration have the potential to disturb an active bird nest to the point of failure if the nest is within immediate proximity to Project activities, and this would also be a violation of the MBTA and Fish and Game Code. Compliance with **RCM BIO-1**, listed above, would assure potential impacts to nesting birds are avoided or minimized.

Mitigation Measures

None required.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. A significant impact could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 177,404, last updated by Ordinance No. 186,873. As set forth in Ordinance No. 177,404, any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, is a protected tree:

- Oak tree including Valley Oak (*Quercus lobata*), California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*);
- Southern California Black Walnut (*Juglans californica var. californica*);
- Western Sycamore (*Platanus racemose*); and
- California Bay (*Umbellularia californica*).

Additionally, Ordinance No. 186,873 also protects two shrubs:

- Mexican Elderberry (*Sambucus mexicana*); and
- Toyon (*Heteromeles arbutifolia*).

As part of the field reconnaissance conducted by South Environmental for the Biological Resources Report, South Environmental found that there are no oak trees or protected trees on the Project Site. Trees observed included in the Project area include small Philippine acacia (*Acacia confusa*), Norfolk Island pine (*Araucaria heterophylla*), Italian cypress (*Cupressus sempervirens*), olive (Olea europaea), longleaf pine (*Pinus paulustris*), maritime pine (*Pinus pinaster*), and Chinese elm (*Ulmus parvifolia*).[22] Paul A. Lewis also surveyed the Project Site in July 2018, March 2022, and June 2025 and found that there are no protected trees on the Project Site and no non-protected trees with a caliper greater than 8 inches on the Project Site. There are no native trees that are protected by the LAMC Protected Tree Ordinance No. 177,404 (no California native oaks, Western sycamore / *Platanus racemosa*, California black walnut / *Juglans californica*, or California bay / *Umbellularia californica*) on the Project Site. There are no *Sambucus Mexicana* / Mexican elderberry or *Heteromeles arbutifolia* / Toyon on the Project Site per LAMC Ordinance 186,873. There are no street trees. There are no protected trees on adjacent properties to the Project Site that will be impacted.[23]

Thus, development of the Project would not affect any protected trees. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures

None required.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with resource policies of any conservation plans of the types cited above.

The Project Site and surroundings are not located in or adjacent to a Significant Ecological Area as defined by the County of Los Angeles.[24] In addition, there are no other sensitive natural communities identified by the CDFW or USFWS. [25,26] Implementation of the Project would not

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22 *South Environmental Consulting, Biological Resources Report for 1501 Marlay Drive, August 2025. See Appendix B.1 of this Initial Study.*

23 *Paul A. Lewis, Landscape Architect, tree surveys conducted at 1501 Marlay Drive, July 6, 2018, March 10, 2022, June 30, 2025. See Appendix B.2 of this Initial Study.*

24 *Los Angeles County, Significant Ecological Areas Map, website: http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed: August 2025.*

25 *California Department of Fish and Wildlife, CDFQ Lands, website: https://apps.wildlife.ca.gov/lands/, accessed: August 2025.*

26 *United States Fish and Wildlife Service, National Wetlands Inventory, website: https://www.fws.gov/wetlands/data/Mapper.html, accessed: August 2025.*

result in any adverse impacts to riparian habitat or other sensitive natural communities.[27] Therefore, impacts would be less than significant, and no mitigation measures are required. The Project's potential impacts related to the City's protected tree ordinance, LAMC Ordinance 186,873, is discussed above under item IV.e. As discussed above, there are no protected trees or shrubs on the Project Site and impacts associated with the local tree preservation policy and any potential impacts to protected trees would be less than significant.

Mitigation Measures

None required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

The following analysis of potential cultural resources impacts of the Project is based, in part, on the Historic Resources Assessment[28] (HRA) prepared for the Project by South Environmental LLC in August 2025. The HRA is included as **Appendix C.1** to this Initial Study and its findings, conclusions, and recommendations are incorporated by reference herein. The Assessment Report & Mitigation Recommendations, Potential Physical Impacts to Stahl House During Construction (Potential Physical Impacts Report) prepared by Structural Focus on April 22, 2025 is also referenced in the following analysis of potential cultural resources impacts. The Potential Physical Impacts Report is included as **Appendix C.2** to this Initial Study and its findings, conclusions, and recommendations are incorporated by reference herein.

[27] *South Environmental Consulting, Biological Resources Report for 1501 Marlay Drive, August 2025. See Appendix B.1 of this Initial Study.*

[28] *South Environmental LLC, Historic Resources Assessment for 1501 N. Marlay Drive, Los Angeles, November 2022. See Appendix C.1 of this Initial Study.*

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as:

1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;

2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or

3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to §5020.1(k) of the Public Resources Code), or identified in an historical survey (meeting the criteria in §5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code §§5020.1 (j) or 5024.1.

Regulatory Setting

National Register of Historic Resources

The National Register of Historic Resources (NRHP) is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

B. That are associated with the lives of persons significant in our past; or

C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in NRHP guidance, "How to Apply the National Register Criteria," as "the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity". NRHP guidance further asserts that properties be completed at least 50 years ago to be considered for eligibility. Properties completed fewer than 50 years before evaluation must be proven to be "exceptionally important" (criteria consideration to be considered for listing).

California Register of Historic Resources

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California".[29] In 1992, the California legislature established the California Register of Historic Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change".[30] The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, enumerated below. According to California Public Resources Code Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history

29 *California Public Resources Code Section 5020.1(j).*

30 *California Public Resources Code Section 5024.1(a).*

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance.[31]

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

City of Los Angeles Historic-Cultural Monuments

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating a Historic-Cultural Monument (HCM). The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. They are defined in the Cultural Heritage Ordinance as follows:[32]

> *HCMs include any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age*.

For the purposes of SurveyLA, this definition has been broken down into the following four HCM designation criteria that closely parallel the existing NRHP and CRHR criteria:

1. Is identified with important events in the main currents of national, State or local history, or exemplifies significant contributions to the broad cultural, political, economic or social history of the nation, state, city, or community; or

2. Is associated with the lives of Historic Personages important to national, state, city, or local history; or

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31 *14 CCR 4852(d)(2).*

32 *Los Angeles Municipal Code Section 22.171.7, added by Ordinance No. 178,402, effective April 2, 2007.*

3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose genius influenced his or her age; or possesses high artistic values; or

4. Has yielded, or has the potential to yield, information important to the pre-history or history of the nation, state, city or community.

City of Los Angeles Permits for Historical and Cultural Buildings

Regarding effects on federal and locally significant properties, LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA Initial Study and Check List, as specified in Section 19.05 of the LAMC. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure."[33]

Description of Project Site

The Project Site consists of vacant property that has never been improved with residential or other development. The Project Site is not within a Historic Preservation Review area, nor is the Project Site within a Historical Preservation Overlay Zone.[34] The Project Site is not identified as an eligible resource by Survey LA, the City's office historic resources survey;[35] or as a City Historic-Cultural Monument.[36] Moreover, the Project Site is not listed as an historical resource in national or state registries.[37]

Adjacent Historical Resource

Overview of the Stahl House

As described in detail in the HRA, the nearest historic resource, the Stahl House, also known as Case Study House #22, an iconic International-style residence, is located directly above the Project Site at 1635 Woods Drive.

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33 *City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.*

34 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

35 *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, website: http://historicplacesla.org/map, accessed November 2022.*

36 *City of Los Angeles Department of City Planning, Historic-Cultural Monument (HCM) List, August 22, 2019.*

37 *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, website: http://historicplacesla.org/map, accessed November 2022.*

The Stahl House is one of the most iconic mid-century homes designed as a part of the Los Angeles based Arts & Architecture magazine Case Study House Program that ran from 1945 until 1966 to entice architects to create homes "capable of duplication and in no sense being an individual 'performance'", to address housing shortage issues and produce a new type of replicable, affordable, mid-century modern home for the average American. With a total of 36 homes designed for the program, 24 built, and 20 still extant, the Case Study House Program had a profound effect on American modernism.[38]

The Stahl House was designed by architect Pierre Koenig who partnered with landowners Buck and Carlotta Stahl to construct their dream house on the edge of a stark piece of land jutting out from the cliff. Built between 1959 and 1960, the famous house is highly regarded as a "superlative architectural statement in steel and glass cantilevered over the broad expanse of Los Angeles."[39] The home was designed in the International Style with features including a one-story L-shaped plan, large concrete pad, steel structural system, floor to ceiling glass, flat roof with deep overhangs, and a 240-degree panoramic view of the city.[40] The specific structural system removed load-bearing walls which permitted wide expanses of unobstructed glass that create transparent indoor-outdoor living. Koenig's design is also notable for its unique division of private and public space. The two bedrooms occupy one wing of the house while the kitchen, dining room, and living room are surrounded by glass with a freestanding fireplace framing the living room. A steel wall faces the street side to establish privacy.[41]

Soon after construction was completed on the Stahl House in 1960, architectural photographer Julius Shulman captured a photograph of the newly completed home in black and white, featuring a pair of seated women in conversation in the living room at twilight. Using a seven-and-a-half-minute exposure, Shulman was able to capture a dreamy glowing ambiance overlooking the grid of Los Angeles's city lights below.[42] Shulman was already an internationally recognized photographer, known for his work with capturing modern architecture, but his first photograph of the Stahl House skyrocketed his and the home's fame. The photograph (refer to Figure 12 of the HRA found in **Appendix C.1** of this Initial Study) has gone on to become one of the most recognizable pictures of residential architecture.[43] Shulman would go on to photograph other parts of the home as well, including the kitchen, living room, carport, pool, and more.[44]

The Stahl House has maintained its fame and recognition well into the 21st century. In 2017, the American Institute of Architects (AIA) listed the Stahl House as one of the 150 buildings on its

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38 *Michelle Hofman, "The Case Study Houses Forever Changed American Architecture" Forbes, February 5, 2021, https://www.forbes.com/sites/michellehofmann/2021/02/05/the-case-study-house-program/?sh=53a59e7a5163*

39 *Amanda Seward, National Register of Historic Places Registration Form for Case Study House #22 (Stahl House), 2013, https://npgallery.nps.gov/NRHP/GetAsset/21b55ed9-5129-4f45-aef5-3067e3e9f11d.*

40 *Seward, National Register of Historic Places Registration Form for Case Study House #22 (Stahl House).*

41 *Andrew Kroll, "AD Classics: Stahl House/ Pierre Koenig," 2010. Arch Daily. https://www.archdaily.com/83038/ad-classics-stahl-house-pierre-koenig.*

42 *Mark Rozzo, "Inside L.A.'s Ultimate Mid-Century Modern Home," Vanity Fair, July 2, 2021, https://www.vanityfair.com/style/2021/07/inside-la-ultimate-mid-century-modern-home.*

43 *Mary Melton, "A Shot In The Dark: The Unknown Story Behind L.A.'s Most Celebrated Photograph," Los Angeles Magazine, December 5, 2016, https://www.lamag.com/longform/a-shot-in-the-dark/.*

44 *Jeffrey Head, "Creating the iconic Stahl House," Curbed. August 24, 2017, https://archive.curbed.com/2017/8/24/16156818/stahl-house-julius-shulman-case-study-22-pierre-koenig.*

"America's Favorite Architecture" list. It was one of only 11 in Southern California and was the only private residence on the list. In 2016, Time magazine named Julius Shulman's image of the Stahl House at night one of the 100 Most Influential Images of All Time.[45]

Historical Significance

In 1999, the Stahl House was declared a Los Angeles Historic-Cultural Monument (HCM #670). It was listed for reflecting "the broad cultural, political, economic or social history of the nation, state, or community, and for its association with the Case Study House program (1945-1966), which profoundly influenced mid-twentieth century residential design."

In 2013, the Stahl House was listed on the NRHP under Criterion A for its association with "experimental modern housing in the postwar years under the auspices of John Entenza's Arts & Architecture magazine" and under Criterion C for embodying "the distinctive characteristics of residential architecture associated with the Case Study House Program," and steel-frame dwelling subtype.[46] Los Angeles Conservancy spent nearly a decade trying to get the Stahl House and several other Case Study House Program homes listed in the NRHP. The Stahl House was listed along with seven other homes in Los Angeles, and two others in San Diego and Ventura Counties.[47]

The significant character-defining features of the Stahl House, designed in the International Style, include:[48]

- one-story, L-shaped plan
- large concrete pad
- steel structural system
- floor to ceiling glass
- flat roof with deep overhangs
- globe pendant lights
- 240-degree panoramic view of the city

Impact Assessment

Viewshed Analysis-Views To the Stahl House

Viewsheds surveyed and photographed as part of the HRA included: 1) looking up at the Stahl House from 1501 N. Marlay Drive; 2) looking up at the Stahl House from Sunset Boulevard; and 3) a profile view of the west elevation of the Stahl House taken from Hillside Avenue.

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45 *Discover Los Angeles, "Discover the Landmark Houses of Los Angeles," February 27, 2002, https://www.discoverlosangeles.com/kr/node/11912#close.*

46 *Seward, National Register of Historic Places Registration Form for Case Study House #22 (Stahl House).*

47 *Adrian Glick Kudler, "LA's Most Famous House Finally Makes the National Register," Curbed Los Angeles, August 20, 2013, https://la.curbed.com/2013/8/20/10244720/las-most-famous-house-finally-makes-the-national-register-1.*

48 *Seward, NRHP Form for Case Study House #22 (Stahl House). Cultural Heritage Commission, Historic-Cultural Monument Application, Stahl House – Case Study House #22, March 12, 1999, https://cityclerk.lacity.org/onlinedocs/1999/99-1681.pdf.*

Looking up at the Stahl House from 1501 N. Marlay Drive: Marlay Drive is a narrow, winding street that terminates at a dead end. The hillside on the north side of the street where 1501 N. Marlay Drive is located slopes upward sharply at a near 90-degree angle. The Stahl House is located at 1635 Woods Drive directly above the Project Site (see Figure 14). Only the southwest corner of the Stahl House is visible from this viewpoint, revealing the underside of its wide, projecting eave, southernmost globe pendant light, and a glimpse of its floor-to-ceiling windows. This particular corner of the Stahl House is arguably the most iconic and photographed element of the entire house, first made famous by Julius Shulman's 1960 photograph of two women seated in the living room, which has become one of the most important photographs of residential architecture ever taken in Los Angeles. However, this sharply upward-facing perspective of the Stahl House's southwest corner is not frequently or famously photographed.

The elevation difference between Marlay Drive and Woods Drive is significant. At the time of the site visit, a concrete retaining wall (visible in all photographs presented above) associated with the neighboring lot at 1509 Marlay Drive was located midway up the slope between Marlay Drive and Woods Drive. The retaining wall is relatively new, as it does not appear in 2022 Google Imagery. This wall is as tall, if not taller than, the existing tri-level single-family residence at 1521 Marlay Drive to the east. These existing elements serve as visual markers for the approximate height of the proposed development at 1501 Marlay Drive.

Renderings of the proposed residence at 1501 Marlay Drive (refer to Figure 8 of this Initial Study, above) indicate that the new residence will be built into the hillside and will be single-story. Additional height comes from a concrete retaining wall that will also be built into the hillside. Although this wall appears to be slightly taller than the adjacent concrete retaining wall at 1509 Marlay Drive and the residence at 1521 Marlay Drive, the recession of the proposed residence into the hillside will allow the Stahl House to remain visible from Marlay Drive. As demonstrated, the concrete retaining wall has the potential to obscure the view of the Stahl House from Marlay Drive.

Looking Up from Sunset Boulevard: The Stahl House is also visible on the north side of Sunset Boulevard at approximately Roxbury Drive, see Figure 15. The south elevation of the Stahl House is visible from the street, notably the southern projection, including its wide projecting eave, its southernmost globe pendant light, and its glass and metal windows. None of the homes below the Stahl House on Marlay Drive are visible from this vantage point because 1) they are not tall enough, and 2) there are several trees that partially obscure the hillside below the Stahl House. Most prominent in this viewshed, is the house adjacent to the east of the Stahl House which was constructed in the 1980s. As made clear from the photographs below, new construction of a single-story residence on Marlay Drive below the Stahl House would not block this notable viewshed from Sunset Boulevard, as none of the existing properties on Marlay Drive are tall enough to be seen from Sunset Boulevard.

Profile of West Elevation from Hillside Avenue: A striking profile view of the Stahl House's west elevation is visible when standing between 8425 and 8401 Hillside Avenue and looking east, see Figure 15. From this vantage point, the concrete retaining wall at 1509 Marlay Drive and the tri-level residence at 1521 Marlay Drive are visible well below the Stahl House and existing tree

line. These existing elements serve as approximate markers for the height of the proposed residence at 1521 Marlay Drive, indicating that construction of the new residence would not impact this viewshed and would likely not even be visible due in large part to the existing tall pine trees that obscure much of Marlay Drive and the bottom portion of the hillside below the Stahl House. A project rendering (see Figure 8 of this Initial Study, above) shows the similarity in height between the proposed residence, the tree line, and the property at 1521 Marlay Drive.

Viewshed Analysis-Views From the Stahl House

The Stahl House offers a 240-degree view of Los Angeles that extends from downtown Los Angeles to Century City to the Pacific Ocean and beyond. However, only viewsheds with the potential to be impacted by the proposed project are discussed here. These include views from the southwest corner of the Stahl House, the pool deck, and the living room. The analysis of significant viewsheds from the Stahl House also relied on the many existing photographs, historical and contemporary, taken by both professional and amateur photographers.

The Southwest Corner: Of the many publicly posted pictures of the Stahl House online, by far the most common angle photographed is the southwest corner of the property, with visitors attempting to recreate the famous Julius Shulman image of two women in conversation in the living room with the Los Angeles nighttime sky behind them (refer to Figure 12 of the HRA found in **Appendix C** of this Initial Study). As demonstrated in the photographs provided in **Appendix C**, also included as Figure 10 of this Initial Study, none of the existing homes located on the north side of Marlay Drive are visible from this viewshed, as they lie directly below the Stahl House at the base of a near 90-degree slope. Even when trying to see over the edge near the southwest corner, none of the homes and very little of Marlay Drive is visible, see Figure 11 of this Initial Study.

The Pool Deck: Another important viewshed that appears in numerous photographs is the view from the pool deck, particularly its southernmost concrete walkway, closest to the steep drop-off. One must be standing at the edge of the concrete walkway and looking directly down to see a small section of Marlay Drive (see Figure 12 of this Initial Study, above). It is estimated that the top of the proposed project would be just below the ridge highlighted in red. Therefore, the proposed residence at 1501 Marlay Drive has no potential to disrupt this important viewshed.

The Living Room: Another iconic viewshed from the Stahl House is the cityscape seen from the glass living room, overlooking Los Angeles as far as the eye can see. Of most important to this analysis is the western portion of this view where the proposed development could potentially impact the view. As shown in Figure 13 above, none of the existing homes located on the north side of Marlay Drive are visible from this from the southwest corner of the living room while looking straight down, as they lie directly below the Stahl House where the cliff drops off sharply at a near 90-degree angle. Residences on the south side of Marlay Drive are visible from this viewpoint. Although portions of the Project Site are visible from this viewshed (see Figure 13), the Project would be built into the hillside below the ridgeline and has no potential to obscure the panoramic views from the living room of the Stahl House.

Physical Impacts Analysis

Another important element that requires consideration are the potential physical impact to the Stahl House resulting from construction on the hillside below. Potential physical impacts including direct vibration impacts, indirect vibration impacts, slope instability, and settlement were analyzed in a letter report prepared by qualified engineers at Structural Focus on April 22, 2025. The Potential Physical Impacts Report is included as **Appendix C.2** to this Initial Study and its findings, conclusions, and recommendations are summarized below.

The Stahl House is a single-story, steel-frame structure set on an L-shaped concrete pad with a flat roof and floor-to-ceiling glass walls, shaded by the overhanging roof deck at the rear of the home. A swimming pool and patio are situated at the rear of the home in the space bounded by the orthogonal wings to the north and east. The building foundation consists of a set of reinforced concrete piles into bedrock connected at the top by reinforced concrete grade beams that support the reinforced concrete slab floor. Each concrete pile location supports a steel column, which in turn provide support for the wide flange steel beams at the roof level. The roof is constructed of steel decking spanning between the steel beams.

The Stahl House is positioned at the edge of a sharply descending south-facing slope, composed of moderately weathered granite bedrock as described in the Schick report. 1501 Marlay (the Project Site) is at the base of the slope. The slope ranges in vertical height from 10 to 25 feet and has a gradient from 1:1 to 0.8:1.

Potential Impacts of Construction Vibration

Ground vibrations are generated during in-ground construction activities such as drilling, excavation, and compaction, as well as by equipment traveling on the ground surface. Traveling generally as surface waves, ground vibrations attenuate, or lose intensity, as they move through the earth away from the source. Varying types of soil and rock attenuate vibrations at different rates. Vibration can be a nuisance to occupants, and may potentially cause damage to structures, their finishes, or their contents.

Potential Direct Vibration Impacts

Vibration has two primary characteristics – the frequency and the amplitude. Amplitude is typically defined by peak particle velocity (PPV) and is measured in inches per second (in/sec). Frequency is measured in Hz, or cycles per second. Ground vibrations excite structures, and the structure typically amplifies the ground vibration, generating higher accelerations, velocities, and displacements within the structure than those measured at ground level. The movement may deform the structure as the roof and floors potentially move at different rates, or even in different directions, relative to each other and to the ground. This deformation generates internal structural stresses which may exceed the strength of the material the structure is made of, causing, for example, stretching, twisting, and warping of steel or cracking or spalling of concrete. At high enough stress, the material, and hence the structure, will not be able to return to its initial position or shape, and the damage is permanent. This may cause a structure to no longer meet functional

or aesthetic requirements. Movement and deformation can also cause a structure to become unstable, presenting an immediate hazard to occupants.

Generally, the greater the amplitude and the lower the frequency, the greater the potential for damage to the structure. Fortunately, construction vibrations are generally lower in amplitude and higher in frequency than those vibrations prone to cause damage to buildings.

The most common type of damage from vibrations related to construction, and the first type initiated, is cracking of rigid, non-structural wall finishes like drywall, plaster or stucco that form during shaking of the structure. This kind of direct damage is generally not a safety concern or a threat to the integrity of the structure, and most structures will reliably return to their original position.

Vibration generated by the proposed downslope construction will travel into the deep foundations of the Stahl House and up into the superstructure, where the energy will dissipate. The steel frame of the building is relatively flexible, with a relatively low natural frequency for a residential structure. Large enough vibrations at lower frequency could generate inertial acceleration of the roof mass, and related movement will cause stress concentrations to develop near the welded beam-column connections. Realistically, if incoming vibrations from construction are well-controlled at the source, the induced vibrations will not generate acceleration and structural displacement on the order required to exceed the elastic response of steel or cause structural damage.

Of non-structural concern are the rigid, plate glass panels bounded by the steel frame. Vibration and displacement of the frame has the potential to create corresponding vibration in the plate glass, as well as stresses in the glass that could lead to cracking. The details of this system and the magnitude of movement of the structure will dictate the ability of the system to accommodate any vibration without incident. It is important to note that the steel frame/plate glass system is evidently able to withstand vibrations caused by high wind events, as well as expansion and contraction of the steel roof and frame under the day/night heat cycle, suggesting the assembly will be able to accommodate vibrations from nearby construction. Nevertheless, it is always wise to limit the amplitude of vibrations in glass, and it may be appropriate to install convenient, temporary adhesive attachments that dampen vibration and protect the glass from damage or consider other protective solutions.

The most significant direct source of vibration from the proposed construction of the Project at 1501 Marlay will be the drilling of the soldier piles supporting the excavation and retaining/impact wall at the rear of the Project Site. The method and speed of drilling affects the amplitude and frequency of vibration, as does the nature of the underlying material. (The granite bedrock forming the hillside that separates the Stahl House from the Project Site will readily transmit vibration energy, as hard rock generally exhibits low vibration attenuation and maintains the higher frequency content.)

Potential Indirect Vibration Impacts

Serious, indirect damage can develop when construction vibration induces settling of soils, possibly leading to uneven displacement of foundations or slabs, generating stress and

deformation in the structural framing system above. This type of damage may compromise the structure and require repair.

Per the geologic engineer, the massive, moderately hard to hard underlying bedrock at the Project Site is not susceptible to settlement due to construction vibration.[49] Since the Stahl House foundations are piles extending into this bedrock and connected by grade beams, differential settlement of the foundation system caused by construction vibration is improbable, as are any related adverse impacts to the superstructure.

Slope Instability

Significant hillside excavations present the obvious concern of overall slope stability during and after construction. Slope instability has potentially catastrophic consequences to structures above, on, or below the slope.

The geologic and soils reports for the Project have determined various factors of safety against slope failure for different failure mechanisms, and the updated Kinematic analysis shown in the 2020 Addendum by SGI[50] demonstrates that the ascending cut slope is kinematically stable when properly shored and after construction of the new retaining wall. The new reinforced concrete retaining wall and pile foundation will ultimately improve the overall stability of the slope, as the slope in its current condition exhibits factors of safety below 1.0.[51]

The reports for the Project provide parameters for the soldier pile system to accommodate the gradual excavation as well as recommendations for lagging design to appropriately resist earth pressure prior to placement of the concrete wall.[52] This is a standard method of excavation in order to install new retaining walls, and performed correctly will provide adequate stability to the slope during construction.

Settlement Due to Retaining Wall Deflection

Cantilevered retaining walls are designed to deflect at the top up to one percent (1%) of the total height upon loading. Substantial deflection can lead to settlement of soil and structures above the retaining wall. The geologic and soils report for the project recommends that the structural engineer design the retaining wall and its foundation in a way that prevents or minimizes any deflection. This would entail designing strong and stiff systems with near zero deflection.

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49 Schick Geotechnical, Inc., Addendum Geologic and Soils Engineering Exploration, 1501 Marlay Drive (SG 6684-W), December 17, 2018 and Schick Geotechnical Inc., Addendum Geologic and Soils Engineering Exploration, Revised Retaining Wall Analyses and Kinematic Analysis, 1501 Marlay Drive (SG 6684-W), June 19, 2020.

50 Schick Geotechnical, Inc., Addendum Geologic and Soils Engineering Exploration, 1501 Marlay Drive (SG 6684-W), December 17, 2018 and Schick Geotechnical Inc., Addendum Geologic and Soils Engineering Exploration, Revised Retaining Wall Analyses and Kinematic Analysis, 1501 Marlay Drive (SG 6684-W), June 19, 2020.

51 Schick Geotechnical, Inc., Addendum Geologic and Soils Engineering Exploration, 1501 Marlay Drive (SG 6684-W), December 17, 2018 and Schick Geotechnical Inc., Addendum Geologic and Soils Engineering Exploration, Revised Retaining Wall Analyses and Kinematic Analysis, 1501 Marlay Drive (SG 6684-W), June 19, 2020.

52 Schick Geotechnical, Inc., Addendum Geologic and Soils Engineering Exploration, 1501 Marlay Drive (SG 6684-W), December 17, 2018 and Schick Geotechnical Inc., Addendum Geologic and Soils Engineering Exploration, Revised Retaining Wall Analyses and Kinematic Analysis, 1501 Marlay Drive (SG 6684-W), June 19, 2020.

Published Vibration Limits

California Environmental Quality Act (CEQA) documents have relied on the Federal Transit Authority (FTA) guidance for noise and vibrations generated by construction. FTA guidance is to limit peak particle velocity (PPV, in/sec) in order to prevent adverse structural impacts. The limits on nearby construction activities for various building types are listed below.

- Project construction activities leading to ground-borne vibration levels exceeding 0.5 PPV at the nearest off-site reinforced concrete, steel, or timber building.
- Project construction activities leading to ground-borne vibration levels exceeding 0.3 PPV at the nearest off-site engineered concrete and masonry building.
- Project construction activities leading to ground-borne vibration levels exceeding 0.2 PPV at the nearest off-site non-engineered timber and masonry building.
- Project construction activities leading to ground-borne vibration levels exceeding 0.12 PPV at buildings extremely susceptible to vibration damage, such as historic buildings.

Buildings extremely susceptible to vibration damage include unreinforced masonry buildings, un-retrofitted tilt-up concrete wall buildings, wood-frame multi-story buildings with soft, weak, or open front walls, and non-ductile concrete buildings.

The above standards could be interpreted to mean that vibration caused by construction activities would be limited to 0.12 in/sec for all historic buildings, including the Stahl House. This stringent limit on vibrations is appropriate for fragile buildings. In that context, it should be recognized that while the Stahl House is a recognized historic resource, it is a modern steel frame building and simply does not have the same structural vulnerabilities to vibration as buildings otherwise categorized as “extremely susceptible” to vibration. The 0.12 in/sec vibration limit is arguably overly conservative.

In August of 2024, the City of Los Angeles Department of City Planning released a document titled Construction Noise and Vibration: Updates to Thresholds and Methodology. This document was developed with input from a Technical Advisory Committee of experts in acoustics and environmental science, with the intent of implementing reasonable standards consistent with other local jurisdictions. For construction noise and vibration, the document shifts from the FTA recommendations to align instead with Caltrans’ standard Transportation and Construction Guidance Manual, updating thresholds the Planning Department uses to evaluate a project’s environmental impacts in accordance with CEQA. To prevent damage to nearby buildings, Caltrans limits Peak Particle Velocity (PPV) generated by construction activities for different building classifications as follows:

- Fragile Buildings: 0.1 PPV
- Historic Buildings: 0.25 PPV
- Older Residential Structures: 0.3 PPV
- New Residential Structures: 0.5 PPV
- Modern Industrial/Commercial Buildings: 0.5 PPV

Research conducted by Mark Svinkin presented at the 19th International Conference on Soil Mechanics and Geotechnical Engineering and provided in his corresponding publication titled "A choice of proper criteria for soil and structural vibrations from construction and industrial sources" reviews several standards for vibration limits. Through this survey, Svinkin is able to establish a frequency-independent safe vibration limit for structures of 2.0 in/sec PPV. Vibrations below this level are generally incapable of causing even cosmetic damage to most structures, including steel buildings. Svinkin notes that a 2.0 in/sec is the maximum vibration generated by human activity such as walking, jumping, slamming doors, etc. in residential structures. Thus, the PPV values recommended by the City of Los Angeles Department of City Planning are well below Svinkin's limit.

The Potential Physical Impacts Report by Structural Focus concludes that "the hillside construction of 1501 Marlay Drive necessitates thoughtful strategies to prevent any adverse physical impacts to the neighboring Stahl House" and recommended implementing a suite of vibration and slope movement mitigation to "allow the project to proceed consistent with the principles of historic preservation of the Stahl House." Mitigation Measures **MM CUL-1** and **MM CUL-2** create a comprehensive Historical Resource Monitoring and Protection Plan, with oversight from a qualified structural engineer and a qualified architectural historian to incorporate the recommendations of the Potential Physical Impacts Report to reduce potential physical impacts to the Stahl House to a less than significant level.

Potential Impact Summary

The Project plans and renderings were reviewed by qualified architectural historians to determine if the Project would have an adverse effect on any significant viewsheds to or from the Stahl House. A survey of the Project Site and surrounding viewsheds to and from the Stahl House, and review of countless photographs of the property's iconic viewsheds indicates that the Project would have no potential to impact any of the Stahl House's significant viewsheds.

However, with respect to potential physical impacts to the Stahl House, as summarized above, the Potential Physical Impacts Report concluded that "the hillside construction of 1501 Marlay Drive necessitates thoughtful strategies to prevent any adverse physical impacts to the neighboring Stahl House" and recommended implementing a suite of vibration and slope movement mitigation to "allow the project to proceed consistent with the principles of historic preservation of the Stahl House." Mitigation Measures **MM CUL-1** and **MM CUL-2** create a comprehensive Historical Resource Monitoring and Protection Plan, with oversight from a qualified structural engineer and a qualified architectural historian to incorporate the recommendations of the Potential Physical Impacts Report to reduce potential physical impacts to the Stahl House to a less than significant level.

With incorporation of mitigation measures **MM CUL-1** and **-2,** there will be no potential physical impacts to the adjacent Stahl House.

Mitigation Measures

MM CUL-1 Retention of Qualified Structural Engineer and Architectural Historian

Prior to the start of project construction, the Applicant shall retain 1) a qualified structural engineer with demonstrated professional experience working with historic buildings and implementing vibration and slope monitoring programs; and 2) a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for architectural history and/or historic architecture (per Title 36 Code of Federal Regulations Part 61) and has demonstrated professional experience implementing historical resource monitoring and protection plans to oversee implementation of the Historical Resource Monitoring and Protection Plan for the Stahl House (Attachment C to the HRA, which is **Appendix C.1** to this Initial Study). The qualifications of the selected individuals shall be reviewed and approved by City of Los Angeles Office of Historic Resources planning staff prior to the start of project construction.

MM CUL-2 Implementation of Historical Resource Monitoring and Protection Plan

A detailed Historical Resource Monitoring and Protection Plan (Attachment C to the HRA, which is **Appendix C.1** to this Initial Study) was prepared in consideration of potential impacts to the adjacent Stahl House resulting from vibration and slope instability. The Applicant shall ensure that all of the required elements of the Plan are adhered to throughout the various stages of pre-construction, construction, and post-construction, and that all training, monitoring, and reporting requirements are completed in accordance with the schedule outlined in the Plan. The project's structural engineer, architectural historian, and on-site construction manager shall be empowered to halt all construction activity that falls out of compliance with the Plan or poses a physical threat to the Stahl House. No construction activity may resume until the threat is analyzed, preventative measures are put in place, and approval is provided by both the project's structural engineer and architectural historian.

Looking up at the Stahl House (circled in red) from N. Marlay Drive, facing north

Closer view looking up at the Stahl House (circled in red) from N. Marlay Drive, facing north

Source: South Environment LLC, November 2022.

Figure 14
Views of the Stahl House from Marlay Drive

Looking towards the Stahl House from Sunset Boulevard, facing north

Profile view of Stahl House and Marlay Drive below including the concrete retaining wall at 1509 Marlay Drive and the residence at 1521 Marlay Drive, view to east

Source: South Environment LLC, November 2022.

Figure 15
Views of the Stahl House from Sunset Boulevard and Hillside Avenue

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the project were to affect archaeological resources which fall under either of these categories.

Based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[53] The Project Site is undeveloped and thus, there is potential for the inadvertent discovery of unknown archaeological resources during development of the Project. However, in accordance with standard conditions of approval for grading permits, the Department of City Planning and Building and Safety requires adherence to regulatory compliance measures and procedures related to the incidental discovery of archaeological resources discovered during construction. If archaeological resources are discovered during surface grading or construction activities, work is required to cease in the area of the find until a qualified archaeologist has evaluated the find and treated it in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project are prohibited from collecting or moving any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site proposed to be developed. The Project's mandatory adherence to this standard condition of approval would ensure that if any archaeological resources are encountered during construction, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. A significant adverse effect may occur if grading or excavation activities associated with a project were to disturb previously interred human remains.

While no formal cemeteries, other places of human internment, or burial grounds sites are known to occur within the immediate Project Site area, there is always a possibility that human remains could be encountered during construction. Should human remains be encountered unexpectedly during grading or construction activities, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary

[53] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, page 2.15-3.*

findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If human remains of Native American origin are discovered during construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (Public Resource Code Section 5097), relating to the disposition of Native American burials would be required. Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant and no mitigation measures are required.

Mitigation Measures

None required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The following analysis of potential energy impacts of the Project is based, in part, on the CalEEMod modeling prepared as part of the AQ/GHG analyses and energy consumption worksheets prepared for the Project. The CalEEMod outputs are included in **Appendix A** of this Initial Study and the energy consumption worksheets are included as **Appendix D** to this Initial Study.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. A significant impact may occur if construction or operation of a project consumed electricity, natural gas, or transportation fuel in a wasteful, inefficient, or unnecessary manner.

Construction

Petroleum-based fuels, such as gasoline and diesel, would be the primary sources of energy for the Project's construction activities. This is because construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural

gas. In addition, most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which have a minimal electrical demand and would be turned off when not in use to avoid unnecessary consumption. Additionally, the use of electricity during construction would be temporary and is typically a fraction of the electrical demand during operation, which, as detailed below, would be well within the supply capabilities of the provider. Petroleum-based fuels would be required to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the Site.

Consumption of transportation fuel during construction would be temporary in nature and construction equipment used would be typical of similar-sized construction projects in the region. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and the contractor would be required to comply with CARB's In-Use Off-Road Diesel Fueled Fleets Regulation that restricts the idling of heavy-duty diesel motor vehicles and governs the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, per applicable regulatory requirements, the Project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct the Project. Furthermore, construction schedules and processes are already designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it.

Operation

Electricity and Natural Gas

During operation of the Project, electricity and natural gas would be consumed for multiple purposes, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances. According to the CalEEMod modeling (see **Appendix A** of this Initial Study), the Project would have an electrical demand of 6,633 kilowatt-hours per year (kWh/yr), or 0.007 gigawatt-hours (GWh), and a natural gas demand of 51,310 cubic-feet (cf) per year, or 141 cf per day.[54] Electricity would be provided to the Project Site by the Los Angeles Department of Water and Power (LADWP), which projects that its total sales in 2027-2028 fiscal year (the Project's operational year) will be 21,273 GWh.[55] Natural gas would be provided to the Project Site by Southern California Gas Company (SoCalGas), which projects that natural gas consumption within SoCalGas' planning area will be approximately 2,177 million cf per day in 2028.[56] As such, the Project's electrical and natural gas consumption would represent negligible

[54] *Note that the CalEEMod outputs present the Project's operational natural gas demand as 53,260 kilo-British thermal units (kBTU) per year. In 2023, the U.S. annual average heat content of natural gas delivered to consumers was about 1,038 BTU (or 1.038 kBTU) per cubic foot. Source: United States, Energy Information Administration, https://www.eia.gov/tools/faqs/faq.php?id=45&t=8. Project consumption calculated as follows: 53,260 kBTU per year / 1.038 kBTU per cubic foot (cf) = 51,310 cf per year / 365 days per year = 141 cf per day.*

[55] *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2022 Power Strategic Long-Term Resource Plan, 2022, Appendix A, Table A-1, p. A-6.*

[56] *California Gas and Electric Utilities, 2022 California Gas Report, Table 32: Southern California Gas Company, Annual Gas Supply and Requirements, Average Temperature Year, page 185.*

portions of the projected demands anticipated by LADWP and SoCalGas for which they have planned supplies.

The Project would be subject to the standards set in the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. The Los Angeles Green Building Code contains mandatory measures for residential and nonresidential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems). California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction Projects. Furthermore, the 2022 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards.

The Project would be designed to be consistent with the requirements and standards of the Los Angeles Green Building Code and the CBC, including the CALGreen Code. There are no unique features of the Project or the Site that would require or result in an unusual or inappropriately high consumption of electricity or natural gas. Furthermore, the Project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by LADWP continues to increase to comply with state requirements through Senate Bill 100 (SB 100), which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045.

Transportation-Energy

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips to and from the Project Site by residents, visitors, and miscellaneous trips such as delivery services. According to the Project's CalEEMod modeling (see **Appendix A** of this Initial Study), the Project would result in 27,568 annual VMT. According to CARB's On-Road Emissions Factor (EMFAC) model, diesel-powered vehicles will account for 4.86 percent of all on-road VMT and will have an average fuel efficiency weighted for percentage of miles traveled of 12 miles per gallon (mpg) in 2028 (the Project's operational year), while gasoline-powered vehicles will account for 87.56 percent of on-road VMT with a fuel efficiency of 28 mpg; electric-powered vehicles, natural-gas-powered vehicles, and plug-in hybrid vehicles will account for the remaining on-road VMT.[57] Accordingly, using the same percentages of VMT and average fuel economy projected by EMFAC, operation of the Project would consume approximately 112 gallons of diesel fuel and

[57] *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2028). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. See Operational Transportation Energy Worksheet in* ***Appendix D*** *of this Initial Study.*

929 gallons of gasoline per year.[58] According to EMFAC modeling, Los Angeles County on-road vehicles will consume 3.30 billion gallons of gasoline and 535 million gallons of diesel in 2028 (i.e., the Project's buildout year).[59] Based on this countywide consumption, the fuel usage during Project operation would represent a negligible portion of fuel consumed in Los Angeles County.

The Project's residents, employees, and visitors would utilize vehicles that comply with CAFE fuel economy standards and the Pavley standards, which are designed to result in more efficient use of transportation fuels. And as detailed in Checklist Question XVII. Transportation, the Project would not conflict with circulation system plans.

Summary

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction or operation. **Therefore, impacts would be less than significant and no mitigation measures would be required.**

Mitigation Measures

None required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact.

State regulations for energy efficiency are contained within California's Building Energy Efficiency Standards and CALGreen, both of which are set forth in California Code of Regulations (CCR) Title 24. California's Building Energy Efficiency Standards were established in 1978 and serve to enhance and regulate California's building standards. These standards include regulations for residential and non-residential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated every three years to incorporate and consider new energy efficiency technologies and methodologies. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The new 2022 standards became effect on January 1, 2023. The Project would be required to meet Building Energy Efficiency Standards and CALGreen standards to reduce energy demand and increase energy efficiency through compliance with the LAMC, which contains measures that meet or exceed the statewide standards, and are ensured during City of Los

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58 *Calculated as follows for diesel: 4.86 percent of total 27,568 VMT = 1,340 diesel VMT / 12 diesel mpg = 112 gallons of diesel. Calculated as follows for gasoline: 87.56 percent of total 27,568 VMT = 24,139 gasoline VMT / 26 gasoline mpg = 929 gallons of gasoline.*

59 *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2028). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. See EMFAC Operational Transportation Energy Worksheet in Appendix D of this Initial Study.*

Angeles Department of Building and Safety (LADBS) plan check as part of the normal building permit process.

The Project would also be subject to the policies set forth in SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) at the regional level. SCAG's 2020 Connect SoCal is the most recent update to their RTP/SCS and is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to Senate Bill (SB) 375. With regard to individual developments, such as the Project, the strategies and policies set forth in Connect SoCal include improved energy efficiency. Connect SoCal's goal is to actively encourage and create incentives for energy efficiency, where possible. As previously discussed, the Project would follow applicable energy standards and regulations with regard to efficiency during construction and would be built and operated in accordance with all applicable Building Energy Efficiency Standards and CALGreen standards in effect at the time of construction. Consistent with LAMC requirements, the Project would include electric vehicle infrastructure and solar panels, in support of alternative modes of transportation and renewable energy sources. In addition, the Project's development in proximity to existing transit would be consistent with the goals of Connect SoCal.

Based on the above, the Project would implement features and systems designed to reduce the consumption of energy and has been located consistent with policies designed to reduce VMT. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **Impacts would be less than significant and no mitigation measures would be required.**

Mitigation Measures

None required.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving?				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐

iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
d. Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

A Geology/Soils Report[60] and Laboratory Test Report[61] were prepared for the Project and submitted to the Grading Division of the Department of Building and Safety (LADBS) for review and approval of Site- and Project-specific conditions with regard to the geologic parameters established in the reports. LADBS issued an Approval Letter[62] for the reports and found that they were acceptable provided that the Project implements the conditions established for the Project and Site contained within the reports and their Approval Letter. Subsequent to the preparation of the above reports, the Project's impact/retaining wall plan was redesigned and two Addenda[63] were prepared evaluating the updated kinematic analysis of the redesign. Following review of the Addenda, LADBS issued additional Approval Letters,[64] finding them to be acceptable provided

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60 *Schick Geotechnical, Inc. Geology/Soils Report (SG 6684-W), April 4, 2014. See Appendix E of this Initial Study.*

61 *CY Geotech, Inc., Laboratory Test Report (CYG 14-7088), February 28, 2014. See Appendix E of this Initial Study.*

62 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016. See Appendix E of this Initial Study.*

63 *Schick Geotechnical, Inc., Addendum Geologic and Soils Engineering Exploration, 1501 Marlay Drive (SG 6684-W), December 17, 2018 and Schick Geotechnical Inc., Addendum Geologic and Soils Engineering Exploration, Revised Retaining Wall Analyses and Kinematic Analysis, 1501 Marlay Drive (SG 6684-W), June 19, 2020. See Appendix E of this Initial Study.*

64 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, April 24, 2019; and City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, July 22, 2020. See Appendix E of this Initial Study.*

that the updated conditions are implemented. These reports and letters are included as **Appendix E** to this Initial Study:

- *Schick Geotechnical, Inc. Geology/Soils Report (SG 6684-W), April 4, 2014.*
- *CY Geotech, Inc., Laboratory Test Report (CYG 14-7088), February 28, 2014.*
- *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, July 24, 2015.*
- *Schick Geotechnical, Inc., Response to City Correction Letter (SG 6684-W), April 16, 2016.*
- *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016.*
- *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, September 13, 2016.*
- *Schick Geotechnical, Inc., Addendum Geologic and Soils Engineering Exploration, 1501 Marlay Drive (SG 6684-W), December 17, 2018.*
- *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, April 24, 2019.*
- *Schick Geotechnical Inc., Addendum Geologic and Soils Engineering Exploration, Revised Retaining Wall Analyses and Kinematic Analysis, 1501 Marlay Drive (SG 6684-W), June 19, 2020.*
- *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, July 22, 2020.*

a) Would the directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. A significant impact may occur if a project is located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed.

Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture to built structures. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. Surface rupture of a fault generally occurs within 50 feet of an active fault line. There are several Alquist-Priolo Earthquake Fault Zones in the Los Angeles region. An Alquist-Priolo Earthquake Fault Zone associated with the Hollywood Fault is located approximately 550 feet southeast of the Project Site at its closest.[65] However, the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone[66] or within a Preliminary Fault Rupture Zone[67] and no known active faults cross the Project Site.[68] As such, the potential for surface fault rupture at the Project Site would be low. Furthermore, the Project would involve the development of a single-family residence and would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust or otherwise have the potential to directly or indirectly exacerbate existing potential for fault rupture. As such, the Project would not cause substantial adverse effects involving rupture of a known fault. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures

None required.

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65 *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/.*

66 *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/.*

67 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

68 *Schick Geotechnical, Inc. Geology/Soils Report (SG 6684-W), April 4, 2014. See Appendix E of this Initial Study.*

(ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. The potential seismic hazard to the Project Site would not be higher than in most areas of the City or elsewhere in the region. The development of a single-family residential building is an expected use typical of urban environments and would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust or otherwise have the potential to directly or indirectly exacerbate existing potential for. However, the Project Site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. There are numerous active faults in the region; as discussed above, the nearest active fault with a surface trace is the Hollywood Fault. Part of the larger Malibu Coast—Santa Monica—Hollywood fault system, the Hollywood Fault is an approximately 9-mile, active fault located along the northern edge of the Los Angeles Basin with a probable magnitude (M) of between M5.8 and M6.5 if rupturing alone (larger if rupture is simultaneous with an adjacent fault).[69] In addition, several buried thrust faults (those faults without a surface expression) underlie the Los Angeles Basin and San Fernando Valley and are capable of generating significant ground shaking in the Los Angeles Area, including at the Project Site.

However, the Project would be required to comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of the seismic standards appropriate to the Project Site and its Seismic Design Category. Based on geotechnical investigations of the Project Site, the Site has been classed as Seismic Site Class C and the Project has been designed consistent with Seismic Design Category E;[70] these designations have been reviewed and approved by LADBS.[71] In addition, pursuant to conditions established for the Project and Site by LADBS in their approval of the geotechnical report, inclusive of laboratory testing and addendums related to structural redesigns of the Project's retaining wall, the geologist and soils engineer shall review and approve the detailed Project plans prior to the issuance of any permits to ensure that all Site- and Project-specific recommendations in their reports have been included in the plans; the seismic design shall be based on the recommended Site Class C and all other seismic design parameters shall be reviewed by LADBS during building plan check; any recommendations prepared by the geologist and/or the soil engineer for correction of geological hazards found during grading shall be submitted to the Grading Division of LADBS for approval prior to utilization in the field; and the geologist and soil engineer shall inspect all

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69 *Southern California Earthquake Center Group C, Earthquake Information, Hollywood Fault, available at: https://scedc.caltech.edu/earthquake/hollywood.html.*

70 *Schick Geotechnical Inc., Addendum Geologic and Soils Engineering Exploration, Revised Retaining Wall Analyses and Kinematic Analysis, 1501 Marlay Drive (SG 6684-W), June 19, 2020. See Appendix E of this Initial Study.*

71 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, July 22, 2020. See Appendix E of this Initial Study.*

excavation to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading.[72]

Based on the above, the Project has been designed in accordance with building code requirements and recommendations pursuant to Site- and Project-specific seismic conditions. In addition, the Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Site- and Project-specific geotechnical report and structural design plans, as well as with all of the conditions issued by LADBS for the Project, which would account for seismic calculations from probabilistic seismic hazard modeling for the Site. Incorporation of adequate seismic design into the Project would be ensured during the City's review of Project plans as part of the normal building permit process. As such, through proper design as outlined in the Site- and Project-specific geotechnical report and structural design plans, as well as with all of the conditions issued by the LADBS Grading Division for the Project (**Appendix E**), and regulatory compliance, the Project would not cause substantial adverse effects involving seismic ground shaking. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the site.

The Project Site is not identified by the City as susceptible to liquefaction,[73] and is not mapped within an area where historic occurrences of liquefaction or geological, geotechnical, and groundwater conditions indicate a potential for liquefaction to occur according to the California

[72] *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016. See Appendix E of this Initial Study.*

[73] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

Geological Survey[74] and the geotechnical investigations conducted for the Project.[75] Furthermore, development of the Project would occur in compliance with regulatory requirements, including the California Building Code and the LAMC, under permit and approval of LADBS. In addition, the Project shall incorporate the conditions of the LADBS Approval Letters (see **Appendix E**).

Pursuant to above conditions established for the Project and Site by LADBS in their approval of the geotechnical reports, inclusive of laboratory testing and addendums related to structural redesigns of the Project's retaining wall, the Project would not cause substantial adverse effects involving seismic-related ground failure. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

(iv) Landslides?

Less Than Significant Impact. A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding.

The Project Site is located within a designated Hillside area and the California Department of Conservation shows that the Project Site is located within a mapped landslide hazard zone.[76] The geotechnical report prepared for the Project described the Project Site as consisting of an ascending slope about 110 feet in height from Marlay Drive to the adjacent lots on Woods Drive. The slope ascends at gradients of about 1.5:1 (H:V) to locally near vertical.[77] The earth materials beneath the Site consist of up to 10 feet of uncertified fill underlain by granite bedrock and no geologic structure, such as joints and fractures, were mapped or reported as part of subsurface exploration of the Site.[78]

As discussed above, compliance with the City Building Code includes incorporation of the Site- and Project-specific design requirements for appropriate cut and fill slopes, excavation characteristics, slope clearance, retaining walls, and general design established for the Project and Site. The Project would be required through regulatory compliance to incorporate the recommendation of the Project's geotechnical engineer contained within the geotechnical report, inclusive of laboratory testing and addendums related to structural redesigns of the Project's

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74 *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/.*

75 *Schick Geotechnical, Inc. Geology/Soils Report (SG 6684-W), April 4, 2014 and Schick Geotechnical Inc., Addendum Geologic and Soils Engineering Exploration, Revised Retaining Wall Analyses and Kinematic Analysis, 1501 Marlay Drive (SG 6684-W), June 19, 2020. See Appendix E of this Initial Study.*

76 *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/.*

77 *Schick Geotechnical, Inc. Geology/Soils Report (SG 6684-W), April 4, 2014 and City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, July 24, 2015. See Appendix E of this Initial Study.*

78 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, July 24, 2015. See Appendix E of this Initial Study.*

retaining wall, and with all of the conditions issued by LADBS per their Approval Letters, which would account for kinematic and slope stability analyses for the Site. Specifically, the following slope stability conditions would apply to the Project:

- Shoring shall be designed for the lateral earth pressures specified in the section title "Soldier Piles" starting on page 3 of the 06/19/2020 report. All surcharge loads shall be included into the design;
- A shoring monitoring program shall be implemented to the satisfaction of the soil engineer;
- Retaining walls higher than 6 feet shall be designed for lateral earth pressure due to earthquake motions as specified on page 2 of the 06/19/2020 report. Note: lateral earth pressure due to earthquake motions shall be in addition to static lateral earth pressures and other surcharge pressures. The height of a stacked retaining wall shall be considered as the summation of the heights of each wall; and
- Basement walls and other walls in which horizontal movement is restricted at the top shall be designed for at-rest pressure as specified on page 2 of the 06/19/2020 report. All surcharge loads shall be included into the design.[79]

In their Approval Letters issued for the Project's geotechnical report, inclusive of laboratory testing and addendums related to structural redesigns of the Project's retaining wall, LADBS determined that the Project design "include an acceptable seismic slope stability analysis and the requirements of the 2020 City of Los Angeles Building Code have been satisfied" and that the Project's geotechnical reports are acceptable provided that the conditions established for the Project and Site in their Approval Letters are complied with during Site development. LADBS ensures that conditions are implemented by requiring that:

- The geologist and soils engineer shall review and approve the detailed plans prior to issuance of any permits. This approval shall be by signature on the plans that clearly indicates the geologist and soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in their reports;
- The soils engineer shall review and approve the shoring plans prior to issuance of the permit;
- Prior to the issuance of the permits, the soils engineer and the structural designer shall evaluate all applicable surcharge loads for the design of the retaining walls and shoring; and

[79] *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, July 22, 2020. See Appendix E of this Initial Study.*

- Installation of shoring, underpinning, slot cutting excavations and/or pile installation shall be performed under the inspection and approval of the soils engineer and deputy grading inspector. [80]

Furthermore, appropriate design and construction of the Project for Site-specific conditions is confirmed through LADBS conditions requiring that:

- The geologist and soil engineer shall inspect all excavation to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading; and

- Any recommendations prepared by the geologist and/or the soils engineer for correction of geological hazards found during grading shall be submitted to the Grading Division of the Department for approval prior to utilization in the field.[81]

As such, the Project would not cause substantial adverse effects involving landslides. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

The Project Site is currently undeveloped and is 100 percent pervious area. The Project would disturb approximately 0.11- and will result in approximately 0.04-acre of impervious area, which is approximately 33 percent of the Project Site.

Construction activities would be subject to the requirements of the Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175, NPDES No. CAS00400, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in the County. Section VI.D.8, of this Permit, Development Construction Program, requires Permittees (which include the City of Los Angeles) to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. Furthermore, all grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential erosion

[80] *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016. See Appendix E of this Initial Study.*

[81] *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016. See Appendix E of this Initial Study.*

impacts to acceptable levels. Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

As a hillside single-family development, the Project would be subject to the BMP requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) adopted by the Regional Water Quality Control Board for the Los Angeles Region. As a permittee, the City of Los Angeles is responsible for implementing the requirements of the County-wide SUSMP within the City. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drainage system. In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance effective May 12, 2012, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater. The LID Ordinance would require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff; reduce stormwater runoff, promote rainwater harvesting; and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, Department of Building and Safety and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Site.

Based on the above, the project would not result in substantial erosion or loss of topsoil. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

Several geotechnical and laboratory reports and addenda have been conducted for the Project and Site, which have assessed the stability of the Project Site and the geotechnical feasibility of the Project. According to the Approval Letters issued by LADBS for the various reports, the Project's reports "include an acceptable seismic slope stability analysis and the requirements of

the 2020 City of Los Angeles Building code have been satisfied."[82] LADBS determined that the reports are acceptable provided that the conditions established for the Project and Site, which have been detailed throughout the analysis in this section, are implemented. LADBS ensures that conditions are implemented by requiring that:

- The geologist and soils engineer shall review and approve the detailed plans prior to issuance of any permits. This approval shall be by signature on the plans that clearly indicates the geologist and soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in their reports;
- The soils engineer shall review and approve the shoring plans prior to issuance of the permit;
- Prior to the issuance of the permits, the soils engineer and the structural designer shall evaluate all applicable surcharge loads for the design of the retaining walls and shoring; and
- Installation of shoring, underpinning, slot cutting excavations and/or pile installation shall be performed under the inspection and approval of the soils engineer and deputy grading inspector. [83]

Through adherence to applicable current building codes and implementation of all Site- and Project-specific design and site development conditions established in the geotechnical reports and Approval Letters, the Project would not exacerbate environmental conditions related to unstable soil. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly, and can cause structural damage to buildings and infrastructure. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Construction of the Project would be required to comply with

[82] *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, July 22, 2020. See Appendix E of this Initial Study.*

[83] *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016. See Appendix E of this Initial Study.*

the California Building Code and Los Angeles Building Code, which include building foundation requirements appropriate to Site-specific conditions, such as expansion potential. In addition, the following conditions have been established by LADBS for the Site and the Project:

- All man-made fill shall be compacted to a minimum 90 percent of the maximum dry density of the fill material per the latest version of ASTM 1557. Where cohesionless soil having less than 15 percent finer than 0.005 millimeters is used for fill, it shall be compacted to a minimum of 95 percent relative compaction based on maximum dry density;
- Existing uncertified fill shall not be used for support of footings, concrete slabs, or new fill;
- All foundations shall derive entire support from competent bedrock, as recommended and approved by the geologist and soil engineer by inspection;
- Slabs placed on approved compacted fill shall be at least 3.5-inches thick and shall be reinforced with 0.5-inch diameter reinforcing bars spaced a maximum of 16 inches on center each way;
- Any recommendations prepared by the geologist and/or the soil engineer for correction of geological hazards found during grading shall be submitted to the Grading Division of LADBS for approval prior to utilization in the field;
- The geologist and soil engineer shall inspect all excavation to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading; and
- Prior to the placing of compacted fill, a representative of the soils engineer shall inspect and approve the bottom excavations…no fill shall be placed until the LADBS Grading Inspector has also inspected and approved the bottom excavations…all fill shall be placed under the inspection and approval of the soil engineer.[84]

LADBS further ensures that such conditions are implemented by the Project by requiring that a written certification to this effect shall be included in the final compaction report filed with the Grading Division of the LADBS, that the compaction report, together with the approved soil report and LADBS approval letter, shall be submitted to the Grading Division of the LADBS, and that an Engineer's Certificate of Compliance containing the legal description as indicated in the grading permit and permit number are included.[85]

Based on the above, compliance with applicable building code regulations and the conditions of LADBS for the Site and the Project, including inspection and confirmation of geologic and soils conditions during construction, would ensure that the Project would not create substantial risks to

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84 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016. See Appendix E of this Initial Study.*

85 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016. See Appendix E of this Initial Study.*

life or property as a result of expansive soils. As such, impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures

None required.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. A significant impact may occur if a project is located in an area not served by an existing sewer system and the subsurface geologic and/or soil conditions are not compatible with a septic or other alternative wastewater system.

The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. LADBS has established a condition of approval that the Project shall be connected to the public sewer system.[86] As such, no septic tanks or alternative disposal systems would be necessary, nor are they proposed or allowed. Therefore, no impacts would occur, and no mitigation measures would be required.

Mitigation Measures

None required.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant. A significant impact may occur if a project directly or indirectly destroys a unique paleontological resource or site or unique geologic feature.

There are no known paleontological resources within the Project Site,[87] and the Project Site and surroundings are not within an area identified as having surface sediments or bedrock where fossils are likely to be found.[88] The Project Site has not been previously disturbed; therefore, excavation may extend into native soils that may contain paleontological resources. Furthermore, the Project would be required to comply with the City of Los Angeles Conservation Element's Site Protection policy regarding designation of a paleontologist and notification, assessment, and removal or protection of paleontological resources should they be encountered during excavation. Per the Conservation Element, "if significant paleontological resources are uncovered during project execution, authorities are to be notified and the designated paleontologist may order excavations stopped, within reasonable time limits, to enable assessment, removal or protection

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86 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, signed by: Edmond Lee, Engineering Geologist Associate II and Ying Liu, Geotechnical Engineer I, June 17, 2016. See Appendix E of this Initial Study.*

87 *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles, page 2.15-4.*

88 *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-3 – Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles, page 2.15-5.*

of the resources."[89] Pursuant to the requirement of the Conservation Element, the City has established the following standard condition of approval related to paleontological resources: in the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. As such, the Project would not destroy a unique paleontological resource or site or unique geologic feature. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds for greenhouse gas (GHG) emissions. A significant air quality impact may also occur if a project is not consistent with

[89] *City of Los Angeles, General Plan, Conservation Element, Adopted September 26, 2001, page II-5.*

applicable plans designed to reduce greenhouse gas emissions, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of such a plan.

GHG emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The Project is anticipated to generate GHG emissions during construction, primarily associated with the use of off-road equipment, on-road haul and vendor trucks, and worker vehicles, and during operation from area sources, energy usage, mobile sources, solid waste, and water/wastewater. As previously described in Section III, Air Quality, CalEEMod Version 2022.1 was used to calculate the air emissions, including GHG emissions, from the Project. The CalEEMod report for the Project is available in **Appendix A** of this Initial Study. Each source of GHG emissions is described in greater detail below:

- **Construction**: The construction-related GHG emissions were calculated by CalEEMod based on the project-specific construction schedule provided by the Applicant and CalEEMod default assumptions for equipment and vehicle fleets. For the purpose of conservatively estimating Project emissions, construction was modeled beginning in July 2026 and concluding in September 2028, for a total of 26 months of construction.[90] Consistent with SCAQMD recommendations, the Project's total construction GHG emissions were amortized over 30 years.

- **Area Sources**: Area sources include emissions from consumer products, landscape equipment and architectural coatings. The Project would comply with SCAQMD Rule 1113. SCAQMD Rule 1113 states that paints applied to building envelope are limited to 50g/L VOC content. No changes were made to the default area source emissions.

- **Energy Usage**: Energy usage includes emissions from the generation of electricity and natural gas used on-site. For residential buildings, CalEEMod energy intensity values (consumption per square foot per year) are based on the CEC's 2019 Residential Appliance Saturation Survey. No changes were made to the default energy usage parameters.

- **Mobile Sources**: Mobile sources include emissions from the additional vehicle miles generated from the Project. The emissions from the vehicle trips associated with the Project have been analyzed in the manner described above in Section III, Air Quality, of this Initial Study. Emissions of GHGs associated with mobile sources from operation of the Project are based on the average daily trip generation rate, trip distance, the GHG emission factors for the mobile sources, and the GWP values for the GHGs emitted. The types of vehicles that would visit the Project Site include all vehicle types including automobiles, light-duty trucks, delivery trucks, and waste haul trucks. Modeling for the

90 *A July 2026 construction start date represents the earliest date that construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emissions factors for later years decrease due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.*

Project was conducted using the vehicle fleet mix for the Los Angeles County portion of the South Coast Air Basin as provided in EMFAC2021 and CalEEMod.

- **Solid Waste**: Solid waste includes the GHG emissions generated from the processing of solid waste from the Project as well as the GHG emissions from the solid waste once it is interred into a landfill. According to the City of Los Angeles Zero Waste Progress Report (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.[91] AB 341 requires that 75 percent of solid waste be diverted from landfills by 2020. However, to be conservative, no changes were made to the default solid waste parameters and no reductions were taken.

- **Water/Wastewater**: Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy associated with supplying and treating water and wastewater. California Green Building Standards require a 20 percent reduction in indoor water usage. To be conservative, no changes were made to the default water usage parameters and no reductions were taken.

The Project's GHG emissions have been calculated based on the parameters as described above. A summary of the results is shown below in **Table 5, Project-Related GHG Emissions,** and the CalEEMod Model runs for the Project are provided in **Appendix A** of this document. **Table 5, Project-Related GHG Emissions,** shows that the Project's emissions would be 30.5 $MTCO_2e$ per year.

Table 5
Project-Related GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Maximum Annual Operations	15.0
Construction Emissions [1]	15.5
Project Total	**30.5**

CO_2e = carbon dioxide equivalent
1 Consistent with guidance from the SCAQMD, construction emissions have been amortized over a 30-year period. Construction emissions of CO_2e would total 466 metric tons (103 tons in 2026, 214 tons in 2027, and 149 tons in 2028).
*Source: CalEEMod Version 2022.1, 1501 Marlay Drive Detailed Report, February 26, 2025. See **Appendix A**.*

The calculation of the amount of GHG emissions that would be attributable to the Project using recommended air quality models is described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy state CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate a project's GHG emissions. However, the analysis of GHG emissions is different from the analysis of criteria pollutants. For criteria pollutants, significance thresholds have been established by SCAQMD based on ambient air quality standards. For GHG emissions, however, no significance thresholds have been established by the state, SCAQMD, or the City of Los Angeles. State CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider other

91 City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013.

qualitative factors that may be used in the determination of significance. The CEQA Guidelines amendments also clarified that the effects of GHG emissions are cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analyses.

Per CEQA Guidelines Section 15064.4(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved - plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[92] Further, the Governor's Office of Planning and Research's (OPR) technical advisory on CEQA and climate change, the Department of Natural Resources Agency's Final Statement of Reasons, and CEQA Guidelines Section 15064.4 provide that a qualitative analysis of project-level impacts to determine whether a project's GHG impacts are significant can be based on a project's consistency with previously approved plans and mitigation programs, as long as such plans have adequately analyzed and mitigated GHG emissions to a less than significant level.93

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, a land use project, the plans most directly applicable to GHG emissions reduction are CARB's 2022 Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. The Project's consistency with these plans is analyzed below.

CARB's 2022 Climate Change Scoping Plan

The state has established three priority areas (transportation electrification, vehicle miles traveled (VMT) reduction, and building decarbonization) for local jurisdictions to focus on when taking meaningful climate action. To assist local jurisdictions, the 2022 Scoping Plan Update presents a list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas.

Transportation Electrification

The GHG reduction strategies related to transportation electrification include converting local government fleets to zero-emission vehicles (ZEV) and creating a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide. Consistent with the 2022 Scoping Plan's goals of transitioning to ZEVs, the City of LA Green New Deal identifies a number of goals to convert the municipal fleet to ZEV and install electric vehicle (EV) chargers throughout the City. Although these strategies apply to City fleets, the Project would not conflict with these goals.

92 *California Code of Regulations, Section 15064(h)(3).*

93 *Governor's Office of Planning and Research, Technical Advisory—CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008; California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, p. 22–26.*

VMT Reduction

The GHG reduction strategies related to VMT reduction include reduction/elimination of minimum parking standards in new developments; implementation of parking pricing or transportation demand management pricing strategies; implementation of Complete Streets policies and investments consistent with general plan circulation element requirements; increasing access to public transit; increasing public access to clean mobility options; amending zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development; and preservation of natural and working lands. Consistent with these strategies, the City of Los Angeles Mobility Plan 2035 contains measures and programs related to VMT reduction throughout the City.

With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of developments near transit (within 0.5-mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips. As detailed in Section XVII, Transportation, of this Initial Study, the Project would not conflict with the policies of the Mobility Plan 2035, including those pertaining to parking management.

With regard to Complete Streets policies and investments, the Mobility Plan 2035 also established a “Complete Streets” planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with California’s Complete Streets Act of 2008. A supplemental update to the Complete Streets Guide was adopted in 2020. The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing, and walking; and establishes guidelines for establishing on-street parking for car sharing. The City has also established Blue LA, which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. This reduction strategy mainly applies to City traffic circulation. However, the Project would support Complete Streets through consistency with the Mobility Plan 2035 (as detailed in Section XVII, Transportation, of this Initial Study).

The remaining strategies for increasing access to public transit and clean mobility options and those related to land use are supported through implementation of SB 375 which requires integration of planning processes for transportation, land use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS’ core vision prioritizes the maintenance and management of the region’s transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Locally, the Complete Streets Design Guide also provides a number of reduction strategies to increase public access to electric shuttles, car sharing, and walking; continues to build out networks for pedestrians, bicyclists, and transit users; has implemented an EV car sharing network; and is working towards increasing publicly available chargers and introducing new electric DASH buses. These reduction strategies mainly apply to increasing Citywide access to and use of public transit and clean mobility options; however, the Project would

not conflict with the City's ability to implement such strategies. As detailed further below, the Project would be consistent with the 2020-2045 RTP/SCS. As detailed in Section XVII, Transportation, of this IS/MND, the Project would not conflict with the policies of the Mobility Plan 2035, including those pertaining to multimodal access.

Building Decarbonization

The GHG reduction strategies for local government climate action related to building decarbonization include adoption of all-electric new construction codes; and adoption of policies and incentive programs to implement energy efficiency retrofits for existing buildings. California's transition away from fossil fuel–based energy sources will bring the Project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. Locally, the City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-electric, which will reduce GHG emissions related to natural gas combustion. The Project would not conflict with Citywide efforts for building decarbonization.

SCAG's 2020-2045 RTP/SCS

The purpose of SB 375 is to implement the state's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel.

Reflecting that purpose, the primary goal of the 2020–2045 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options.94 To accomplish this goal, the 2020–2045 RTP/SCS identifies various strategies to reduce per capita VMT. The 2020–2045 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.95

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.96 Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of

94 *SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.*

95 *SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.*

96 *SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.*

vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.97

As detailed in **Section XVII, Transportation**, of this IS/MND, the Project would generate 10 daily vehicle trips, which is far below the 250-daily-trip threshold for VMT analysis established in the City's Transportation Assessment Guidelines. Furthermore, as discussed in **Section XIV, Population and Housing**, of this Initial Study, the 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth that are based on the local plans and policies applicable to the specific area and used by SCAG in all phases of implementation and review. As detailed in **Section XIV**, the Project would be consistent with the regional growth projections for the Los Angeles Subregion.

City of Los Angeles Green New Deal

The City's Green New Deal includes both short-term and long-term aspirations through the year 2050 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.

While not a plan adopted solely to reduce GHG emissions or directly applicable to private development projects, within the City's Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. Although the Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, certain reductions associated with the Project would promote the Green New Deal's goals. Such reductions include obtaining power from LADWP, which currently provides 39.5 percent of electricity via eligible renewable sources[98] but has committed to providing an increasing percentage from renewable sources that exceed the RPS requirements by providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. The Project would also incorporate eco-friendly and recycled building materials, systems, and features wherever feasible, including energy efficient appliances, water saving/low-flow fixtures, non-volatile organic compound paints/adhesives, drought-tolerant planting, weather- or soil-based automatic irrigation system controllers, and a high-performance building envelopment, and would adhere to all City Building Code and Title 24 energy efficiency standards. In addition, the Project would comply with the City of Los Angeles Solid Waste Management Policy Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal with regard to energy-efficient buildings, waste, and landfills.

LA Green Building Code

The Project would comply with the Los Angeles Green Building Code by complying with the California 2022 Title 24 Building Energy Efficiency Standards, as codified with amendments by the City. The proposed home would meet and/or exceed all City Building Code and Title 24 requirements. As such, the building would incorporate eco-friendly building materials, systems,

97 *SCAG, Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, December 2019, p. 3.8-61.*

98 *City of Los Angeles, 2023 Power Content Label, 2023, website: https://www.ladwp.com/who-we-are/power-system/power-content-label, accessed March 2025.*

and features wherever feasible, including Energy Star®-rated appliances if provided, water saving/low-flow fixtures, non-volatile organic compound paints/adhesives, drought-tolerant planting, and high-performance building envelopment. Therefore, the Project would not conflict with the Los Angeles Green Building Code.

Conclusion

Based on the above, the Project's GHG emissions would be generated in connection with a development located and designed to be consistent with the applicable goals and actions for reducing GHG emissions. The Project's consistency with applicable GHG reduction plans and policies demonstrate that the Project would not conflict with regulations and policies and complies with the regulations and reduction actions/strategies outlined in the CARB's Climate Change Scoping Plan, the SCAG's 2025-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. **Therefore, the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The Project also would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not be cumulatively considerable or result in a significant impact on the environment. Project-specific impacts with respect to GHG emissions would be less than significant, and no mitigation measures are required**.

Mitigation Measures

None required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids, as well as coatings, paints adhesives, and caustic or acidic cleaners. However, standard construction BMPs for the use and handling of such materials would be implemented and are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and proper storage of hazardous materials. Any use of potentially hazardous materials during construction of the proposed Project would comply with all local, state, and federal regulations regarding the handling of potentially hazardous materials. Furthermore, the transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22.

The types and amounts of hazardous materials that would be used in connection with operation of the Project would be typical of those used in other residential developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. As such, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions.

As detailed below in response to Checklist Question IX(d), the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination. In addition, no such sites are located within 1,000 feet of the Site.[99] Therefore, it would not be expected that construction of the Project would encounter contaminated soils, groundwater, or soil vapor that could be released into the environment. In addition, there are no existing structures at the Project Site; therefore, there would be no potential for construction to encounter, handle, or dispose of hazardous construction materials, such as lead-based paint or asbestos, that could be release into the environment if handled or disposed of incorrectly.

As discussed above, the use of common, household hazardous material during operation would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. In addition, the Project Site is not located within a Methane Zone or Methane Buffer Zone[100] and would, therefore, not experience methane seepage.

Based on the above, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant and no mitigation measures would be required.

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[99] *California Environmental Protection Agency, Cortese List Data Resources, website: https://calepa.ca.gov/SiteCleanup/CorteseList/.*

[100] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

Mitigation Measures

None required.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. A significant impact may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds.

There are no existing schools within one quarter-mile of the Project Site. The nearest school to the Project Site is the West Hollywood College Preparatory School (1317 N. Crescent Heights Boulevard) located approximately 0.5-mile to the southeast. In addition, no new schools are currently proposed for within one quarter-mile of the Project Site. Furthermore, as discussed above in response to Checklist Question IX(a), the types of hazardous materials that would be used in connection with the Project would be minor amounts of those typical for residential uses. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter-mile of a school. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

No Impact. California Government Code Section 65962.5 requires various state agencies to compile lists, commonly referred to as the "Cortese List," of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The specific agencies and hazardous materials/waste sites regulated under California Government Code Section 65962.5 currently include the California Department of Toxic Substance Control's EnviroStor database and list of facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code; and the California State Water Board's GeoTracker database, list of solid waste disposal sites with waste constituents above hazardous

levels, and list of active Cease and Desist and Cleanup and Abatement Orders.[101] The Project Site is not identified on any of the lists compiled pursuant to Government Code Section 65962.5. Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment in regards to siting the Project on a known hazardous waste site or any other type of site appearing on a list compiled pursuant to Section 65962.5 of the Government Code. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The Project Site is not located within any airport's influence area nor within two miles of an existing airport.[102] The nearest airport to the Project Site is the Hollywood Burbank Airport, which is located approximately seven miles north of the Project Site. Therefore, the Project would not result in a safety hazard or excessive noise related to airports for people residing or working in the Project area. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

The City's Emergency Management Department maintains the City of Los Angeles Emergency Operations Plan (EOP), last updated in November 2018. The EOP describes the overall Citywide response functions and capabilities for small to large scale emergency situations. In addition, the Evacuation Functional Support Annex (EFSA), last updated in October 2020, was developed in support of the EOP to facilitate City and other responsible agency response during evacuations.

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101 *California Environmental Protection Agency, Cortese List Data Resources, website: https://calepa.ca.gov/SiteCleanup/CorteseList/.*

102 *Los Angeles County Airport Land Use Commission, Airports and Airport Influence Areas, June 2012, available at: http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf.*

While the EOP and EFSA do not identify specific emergency response or evacuation routes, they establish that primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and County of Los Angeles, and state that the City will work with the Operational Area, Los Angeles County Sheriff, Law Enforcement agencies from surrounding jurisdictions, California Department of Transportation (Caltrans), California Highway Patrol (CHP), City and/or County Public Works, and other applicable agencies or departments to identify evacuation pick up points and transportation routes. Consistent with this approach, the City's 2021 Safety Element Update acknowledges that "jurisdictional infrastructures, such as roads and emergency services, have become increasingly interrelated," and refers to the Los Angeles County Safety Element for critical systems and evacuation routes for the entire County. Laurel Canyon Boulevard, located approximately 0.25-mile east of the Project Site, and Sunset Boulevard, located approximately 0.25-mile south of the Project Site, are identified as a disaster routes by the Los Angeles County Safety Element.[103] In addition, the Los Angeles County Safety Element identifies the 101 Freeway, located approximately 3 miles east of the Project Site, as a possible evacuation route.[104] The Project Site is not located along any of the identified disaster or evacuation routes.

Although construction may require staging of equipment and/or worker vehicles along Marlay Drive, the Project applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Work Area Traffic Control Plan will be developed for use during the entire construction period. The Work Area Traffic Control Plan will identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of grading and construction activity. The Work Area Traffic Control Plan would minimize the potential for conflicts with or impairment of an emergency response or evacuation during construction.

During operation, all driveways and access points proposed for the Project Site would comply with Fire and Building Codes subject to review and approval of LADBS and LAFD as part of the building permit process. In addition, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way and emergency access to the Project Site would continue to be provided from Marlay Drive. As discussed in greater detail in response to Checklist Questions XV(a) and XV(b), drivers of emergency vehicles normally have a variety of options to facilitate emergency response, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. These same options would be available during an emergency response plan or evacuation plan. Moreover, the operation of a single-family residence would not be expected to increase the volume of traffic in the vicinity in a manner that could impact the performance of roadways that could be utilized as evacuations routes during an emergency.

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103 *Los Angeles County Department of Regional Planning, General Plan 2035, Safety Element, Updated July 12, 2022, Figure 12.6: Disaster Routes Map, Updated July 12, 2022.*

104 *Los Angeles County Department of Regional Planning, General Plan 2035, Safety Element, Updated July 12, 2022, Figure 12.9: Possible Evacuation Routes Map.*

Based on the above, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could expose persons or structures, either directly or indirectly, in the area in the event of a fire.

According to ZIMAS, the Project Site is located within a Very High Fire Hazard Severity Zone.[105] This designation includes "lands designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors".[106] Areas designated within a Very High Fire Hazard Severity Zone are be required to be designed and constructed in accordance with the Los Angeles Fire Code and would be required to incorporate fire-resistant measures, including but not limited the following:

- Ignition-resistant roofing and other building materials
- Fire-Retardant-Treated Wood or noncombustible materials
- Roof coverings, valleys, and gutters
- Attic ventilation
- Eave or cornice vents
- Sprinkler systems
- Landscaping with fire-retardant plants
- Vegetation clearance

Additionally, prior to issuance of an Occupancy Permit, the Project Applicant would be required to coordinate with Los Angeles Fire Department (LAFD) to ensure that the Project incorporates all appropriate fire-prevention measures. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Additionally, owners of the proposed residences would be required to maintain defensible space per regulation found in the California Public Resources Code 4291

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105 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

106 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

as applicable. As discussed below in response to Question XV(a) the residence would be required to contain automatic sprinklers, pursuant to LAMC Section 57.512.2. Accordingly, the Project would comply with current building codes as well as regulations regarding maintenance of defensible space and would not directly or indirectly expose people or structures to significant risk of loss involving wildland fires. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface ground water quality?

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts may also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction

Construction activities associated with the Project have the potential to degrade surface water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. However, construction activities would be subject to the requirements of the Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175, NPDES No. CAS00400, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the “Los Angeles County MS4 Permit”), which controls the quality of runoff entering municipal storm drains in the County. Section VI.D.8, of this Permit, Development Construction Program, requires Permittees (which include the City of Los Angeles) to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed federal, state, and local mandated guidelines for storm water treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation, disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.

Operation

As a hillside single-family development, the Project would be subject to the BMP requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) adopted by the Regional Water Quality Control Board for the Los Angeles Region. As a permittee, the City of Los Angeles is responsible for implementing the requirements of the County-wide SUSMP within the City. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the SUSMP

requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drainage system.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance effective May 12, 2012, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater. The LID Ordinance would require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff; reduce stormwater runoff, promote rainwater harvesting; and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, Department of Building and Safety and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the site. The SUSMP consists of structural BMPs built into the design of a project for ongoing water quality purposes over the life of a project. Additionally, because the project site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site in comparison to existing conditions.

Furthermore, operational activities that could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. No underground storage tanks are currently operated at the Project Site, nor would any be operated by the Project. While the development of a new home on the site would slightly increase the use of on-site hazardous materials, such as cleaning and landscaping supplies, compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

Therefore, based on the above, with appropriate site design and compliance with the applicable federal, state, and local regulations, as well as permit provisions, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures

None required.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or included

withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge.

According to the 2020 Urban Water Management Plan (UWMP), water supply in the area is provided by the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources.[107] Excavation for the construction of the basement level is anticipated to extend to a depth of 29 feet below ground surface, including foundation excavations. The Project Site is not identified by the City as susceptible to liquefaction,[108] and is not mapped within an area where historic occurrences of liquefaction or geological, geotechnical, and groundwater conditions indicate a potential for liquefaction to occur according to the California Geological Survey.[109] Based on these considerations, it is not anticipated that groundwater would be encountered during excavation. Furthermore, operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. Further, according to the 2020 UWMP, LADWP expects to be able to provide reliable water supplies for an average year, single dry year, and multiple dry years for its existing and planned supplies. As discussed further in Checklist Question XIX, Utilities and Service Systems, LADWP would have sufficient water supply to provide for the Project's water use. Therefore, the Project would not impede groundwater infiltration at the Project Site and Project water use would not result in significant depletion of groundwater supplies. Impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures

None required.

107 *City of Los Angeles Department of Water and Power, Urban Water Management Plan 2020, May 25, 2021.*

108 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

109 *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed November 2022.*

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:

(i) Result in substantial erosion or siltation on- or off-site?

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact.

Construction

Project construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. However, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments and pollutants from the Project Site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in a Storm Water Pollution Prevention Plan (SWPPP), which must be acceptable to the City and in compliance with the NPDES Stormwater Regulations.

Due to the stringent controls imposed under the NPDES Permit, including preparation of a SWPPP and BMPs, the Project would not result in erosion or siltation, on- or off-site flooding, or polluted runoff during construction. Impacts would be less than significant, and no mitigation measures would be required.

Operation

The existing surface drainage of the hillside Project Site is by sheet flow runoff down the grades of the Site towards the south. The Project would involve the construction of a single-family home on an approximately 5,025.8 square-foot (0.11 acre) parcel. Impervious cover would include the residence and the hardscape walkways/driveway. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drainage system. Accordingly, runoff flow would be reduced as a result of the Project, consistent with the requirements of the NPDES permit and LID Ordinance, which require a reduction of the volume of runoff from the Project Site when compared to existing conditions. As such, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to

require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the Project would not alter the existing drainage pattern of the Project Site in a manner that would result in erosion, flooding, exceedance of storm drainage systems, or provide sources of polluted runoff. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

(iv) Impede or redirect flood flows?

No Impact. A significant impact may occur if a project results in a substantial alteration of flood flows.

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.[110] No streams or rivers that may overflow or breech a levee are located on or near the Project Site and the Project Site is not located within any high-risk coastal areas. In addition, the Project Site is not located within a tsunami hazard area or potential inundation area of a dam or flood control basin.[111] As such, the Project would not be expected to encounter flood flows that may be impeded or redirected. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

According to the FEMA Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.[112] The Project Site is not located

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110 *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1605F, effective September 2008.*

111 *County of Los Angeles Department of Regional Planning, Los Angeles County General Plan Safety Element, Exhibit G: Inundation and Tsunami Hazard Areas, December 1990.*

112 *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1605F, effective September 2008.*

within a potential inundation area as modeled by the City.[113] As the Project Site is not located within a designated flood plain area, and is not within a potential inundation area, the Project would not increase the risk of pollutants release due to inundation.

Tsunamis are large waves generated at sea by significant disturbance of the ocean flow, causing the water column above the point of disturbance to displace rapidly. According to the City of Los Angeles ZIMAS website, the Project Site is not located within an area potentially affected by a tsunami.[114] Seiches are large waves generated in enclosed bodies of water, such as lakes, induced by ground shaking. There are no major water bodies in the vicinity of the Project Site that would put the site at risk of inundation by seiche.

Furthermore, the Project proposes a residential land use, which do not represent the type of use that would otherwise degrade water quality (e.g., an industrial land uses or point-source discharges of polluted water). Anticipated and potential pollutants generated by the Project would be limited to those typical of a residential land use and include pesticides, cleaning products, trash, and oil/grease. These materials would be properly stored and handled as to avoid spilling contents in an area that may encounter flood water. As such, the Project would not risk release of pollutants due to inundation.

With regard to mudslides or mudflow, refer to item Checklist Question VII.a(iv) regarding landslides. Impacts would be less than significant and no mitigation measures are required.

Mitigation Measures

None required.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. A significant water quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans.

Water quality control plans applicable to the Project include the Los Angeles Regional Water Quality Control Board's (LARWQCB) *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) and the City's *Water Quality Compliance Master Plan for Urban Runoff* (Master Plan). Adopted by LARWQCB, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Master Plan was developed by the Bureau of Sanitation, Watershed Protection Division in collaboration with stakeholders with the primary goal of the

113 *City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, adopted November 1996.*

114 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: November 2022.*

Master Plan is to help meet water quality regulations. The Master Plan identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City's waters, identifies known sources of pollutants, describes the governing regulations for water quality, describes the BMPs that are being implemented by the City, discusses existing Total Maximum Daily Loads (TMDL)[115] Implementation Plans and Watershed Management Plans.

Construction and operation of the Project would involve activities that have the potential to conflict with the water quality goals in the Basin Plan and Master Plan through the spread of contaminants into surface or groundwater supplies. However, as previously detailed, construction of the Project is not expected to encounter groundwater and would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials, and the requirements of the NPDES Permit, including implementation of an SWPPP for the prevention of erosion and spread of polluted runoff. These regulations and practices effectively control the potential stormwater pollution to surface water during construction. Furthermore, the proposed residential land use does not represent the type of use that would have the ability to adversely affect water quality. Anticipated and potential pollutants generated by operation of the Project would be addressed through the implementation of approved LID BMPs. While the development of a new building would slightly increase the use of on-site hazardous materials (i.e., those typically used on residentially zoned properties such as cleaning products, paints, trash, etc.), compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, operation of the Project would not require direct groundwater extraction either through permanent dewatering or for water supply use.

With regard to groundwater management plans, on September 16, 2014, the State of California signed into law the Sustainable Groundwater Management Act (SGMA). Comprised of three bills, AB 1739, SB 1168, and SB 1319, the SGMA provides a framework for long-term sustainable groundwater management across California and requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the roadmap laid out by the legislation, local and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that will oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP). Local stakeholders have until 2022 (in critically overdrafted basins until 2020) to develop, prepare, and begin implementation of Groundwater Sustainability Plans. GSAs will have until 2042 (2040 in critically overdrafted basins) to achieve groundwater sustainability.

115 *Total Maximum Daily Load (TMDL)is a regulatory term referring to the maximum amount of a pollutant that a body of water can receive per day while still meeting water quality standards.*

The Project Site does not overlie a groundwater basin.[116] Regardless, the Project would receive its water from the LADWP, which does utilize groundwater from throughout its service area. Both the LADWP and the California Department of Water Resources have programs in place to monitor wells to prevent overdrafting. The LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater basin through native and imported groundwater recharge. Furthermore, protection from potential overdraft conditions is provided by the court-appointed Los Angeles River Area Watermaster. LADWP addresses water supply needs through preparation of an UWMP, which projects future water use demands and identifies water supplies to meet these demands and is updated every five years. As described in detail in Checklist Question XIX(b), the Project's water demand would be within the projections of the UWMP and the Project would be required to implement water saving features to reduce the amount of water used by the Project in accordance with water conservation measures, including Title 20 and 24 of the California Administrative Code. Furthermore, as previously discussed, neither construction nor operation of the Project is anticipated to encounter groundwater, therefore, the extraction of groundwater would not be required.

Accordingly, based on the above, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established

116 *California Department of Water Resources, Sustainable Groundwater Management Act Basin Prioritization Interactive Map, available at: https://gis.water.ca.gov/app/bp-dashboard/final/, accessed November 2022.*

community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community).

The Project Site is located within the boundaries of the Hollywood Community Plan, in the Hollywood Hills neighborhood of Los Angeles, and is currently undeveloped and vacant. The surrounding area is characterized by single family residential uses and vacant hillside land. The single-family residential uses in the area immediately surrounding the site vary in lot sizes, 5,000 square feet to 9,000 square feet. The Project would build one single-family home on the existing lot and would improve Marlay Drive to serve the new home and create a turn-around road terminus. As such, the Project would be an infill Project providing uses in keeping with the residential character of the surrounding area. Given its residential infill character, the Project would not introduce land uses that are inconsistent with development in the local area or affect existing land use relationships. Therefore, the Project would not physically divide an established neighborhood or community and related impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures

None required.

b) Would the project cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

Regionally, the Project Site is located within the planning area of SCAG, the federally designated metropolitan planning organization. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with SCAG's adopted regional plans. As the Project proposes one (1) new single-family residence, the Project does not meet the criteria for being regionally significant pursuant to the CEQA Guidelines, Section 15206(b)(2)(D); therefore, no further analysis of SCAG consistency is required. The Project is also located within the regional planning area of the SCAQMD AQMP. As evaluated in Checklist Question III, Air Quality, the Project is consistent with the AQMP, and no further analysis is required.

Locally, the Project Site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the land use designations and zoning regulations of local land use plans and the zoning ordinance, discussed below.

City of Los Angeles General Plan

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future

needs and desires of the community, while integrating the seven state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation, as well as the General Plan Framework Element and includes an Air Quality Element and Health and Wellness Element (Plan for a Healthy Los Angeles). The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses Citywide policies, and also includes the 35 community plans that guide land use at a local level. The Project Site is located in the Hollywood Community Plan Area, which is one of the 35 community plans of the Land Use Element. The following discusses the General Plan Framework Element and the Community Plan, which address land uses.

General Plan Framework Element

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans. The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in Table 6, Project Consistency with the Framework Element. Applicable objectives and policies for single-family residential uses begin with Objective 3.5. As shown, the Project would be consistent with the applicable objectives and policies.

Table 6
Project Consistency with the Framework Element

Objective/Policy [a]	Project Consistency
Land Use Chapter	
Objective 3.5: Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.	**Consistent.** The Project would develop one (1) new single-family residence on a parcel designated for one-family residential density. The Project would be consistent the single-family residential uses surrounding the Project Site. The Project would be consistent with zoning for the parcel and would increase residential density on underutilized parcels, therefore creating compatible infill development in an otherwise urbanized location.
Policy 3.5.1: Accommodate the development of single-family dwelling units in areas designated as "Single- Family Residential" on the General Plan Framework Long-Range Land Use Diagram, in accordance with Table 3-1. The density permitted for each parcel shall be identified in the community plans using land use categories specified in Table 3-2.	**Consistent.** The Project would be consistent with the existing R1-1-HCR zoning and the Community Plan designation of Low II Residential. The Project would be consistent with the permitted single-family use and density pursuant to Tables 3-1 and 3-2 of the Framework Element, as referenced.

Table 6
Project Consistency with the Framework Element

Objective/Policy [a]	Project Consistency
Policy 3.5.2: Require that new development in single-family neighborhoods maintains its predominant and distinguishing characteristics such as property setbacks and building scale.	**Consistent.** Along with the slope of this hillside lot, the location at the terminus of Marlay Drive and the configuration of the other improvements in the immediate vicinity entail additional site constraints, necessitating the various Zoning Administrator Determinations authorizing waivers of certain development standards. LAFD has determined that a turnaround is required in order to develop the property because of the location of the site at the terminus of a substandard hillside limited street. This turnaround would require a dedication of land between 2 feet and 19 feet 17.5 inches along the property frontage to create a turnaround on the substandard Marlay Drive at the terminus, adjacent to the proposed home. Because of this requirement, the Project Applicant is requesting a front yard setback below the prevailing front yard setback of 7.5 feet to accommodate the turn-around dedication of land. The Project would include a front yard setback between 2 inches and 19 feet 7.5 inches, after providing the required dedication of land. The dedication of land also results in the proposed home being located further into the hillside, which triggers the Project's request for higher retaining walls in the front yard setback area. The required dedication and associated improvements will benefit other properties along Marlay Drive and improve the LAFD ability to fight fires in the hillside area. Thus, although the proposed front yard setback would not meet prevailing conditions, and the Project requests additional and higher retaining walls than typically allowed, the Project would not conflict with this policy. Side and rear setbacks would be provided as required by code; residential floor area and height would not exceed code requirements.
Housing Chapter	
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.	**Consistent.** The Project would develop a new single-family home on a parcel zoned for single-family homes where currently no development exists. This would create 1 additional housing unit as zoned.
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.	**Consistent.** The Project would develop 1 new single-family home on a lot designated for single-family residential use, in compliance with the underlying General Plan land use designation and proposed zone. The development of the single-family home would add 1 unit of housing stock to the City on a currently vacant lot.

Table 6
Project Consistency with the Framework Element

Objective/Policy [a]	Project Consistency
Policy 4.1.4: Reduce overcrowded housing conditions by providing incentives to encourage development of family-size units.	**Consistent.** The Project would develop 1 new single-family home, with approximately 3,100 square feet of living space including basement levels. The home includes 3 bedrooms and would be anticipated to house a family.
Objective 4.3: Conserve scale and character of residential neighborhoods.	**Consistent.** The Project would develop a single-family home on a parcel currently surrounded by other single-family homes, thus conserving the scale and character of the existing residential neighborhood. The existing residential homes surrounding the site are mostly hillside single-family homes, mostly multi-level like the proposed Project.
Urban Form and Neighborhood Design Chapter	
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**Consistent:** The Project would develop a vacant, undeveloped site with new single-family residential home constructed to the latest resource-efficient requirements of the LA Green Building Code. The Project would clear and grade the parcel according to the standards of the Bureau of Engineering and would also dedicate land to create a turnaround at the terminus of Marlay Drive per the requirement of LAFD, improving the ability of LAFD to access the hillside and fight fires. Thus, the Project would improve the quality of life and aesthetic quality of the public realm.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**Consistent:** The continuous visible and non-visible presence of residents on the parcel at all times of the day would provide a sense of security on the site and at the terminus of Marlay Drive. The new home would be equipped with security and entry lighting and Marlay Drive would be improved to accommodate enhanced fire access and personal safety.

a City of Los Angeles, The Citywide General Plan Framework Element, readopted August 2001.
Source (table): EcoTierra Consulting, 2022.

Hollywood Community Plan

The City's community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Hollywood Community Plan guides land uses on the Project Site and in the surrounding areas within the Community Plan Area. This Community Plan sets forth planning goals and objectives to maintain the community's distinctive character.

As set forth in the Community Plan, the Project Site is designated for Low II Residential land uses, with corresponding zones R1 and RS.[117] The Project would be consistent with this land use designation as the Project's single-family residential land use is allowed in the Low II Residential land use designation. Moreover, the Project is consistent with multiple other Community Plan objectives and policies. The Project's consistency with these applicable objectives and policies is presented in **Table 7, Project Consistency with the Hollywood Community Plan**.

Table 7
Project Consistency with the Hollywood Community Plan

Objectives and Policies [a]	Project Consistency
Objectives	
Objective 3. To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.	**Consistent.** The Project would add 1 single-family dwelling unit, providing 1 new opportunity for housing choice, within the Community Plan Area.
Housing	
The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon, shall be limited in accordance with the following criteria: 1. The adequacy of the existing and assured circulation and public transportation systems within the area; 2. The availability of sewers, drainage facilities, fire protection services and facilities, and other public utilities; 3. The steepness of the topography of the various parts of the area, and the suitability of the geology of the area for development.	**Consistent.** 1. The Project would be developed off of an existing street, Marlay Drive, which would be improved to its terminus adjacent to the Project Site in accordance with LADOT and LAFD standards. 2. The Project area is served by public services and utilities, which would also serve the Project Site. The Project would not require and does not propose increases or expansions of off-site utilities or extension of public roadways into undeveloped areas. Minor local upgrades and connections to off-site utilities may be required; however, all such upgrades and connections would serve to increase capacity for the Project and existing local land uses. 3. According to the Geology and Soils Approval Letters (2020, 2019, 2016) provided by LADBS regarding the Geotechnical Reports prepared by the Project, the Geotechnical Reports "include an acceptable seismic slope stability analysis and the requirements of the 2020 City of Los Angeles Building code have been satisfied". The recommendations of the Geotechnical Reports are included in the Geology and Soils Approval Letters provided by LADBS, which have become conditions of the Project. The Project will be required to comply with the LADBS conditions. Thus, the topography of the Project Site as it relates to the proposed Project has been reviewed and analyzed and deemed suitable by the City.

117 *City of Los Angeles, General Plan Land Use Map, Hollywood Community Plan as of April 2014, website: https://planning.lacity.org/odocument/17308382-2458-45c4-a327-54cd9593955a/hwdplanmap.pdf, accessed: August 2022.*

Table 7
Project Consistency with the Hollywood Community Plan

Objectives and Policies [a]	Project Consistency
The low-density residential character of many parts of Hollywood should be preserved, and lower density (Low Medium I or more restrictive) residential neighborhoods should be protected from encroachment by other types of uses, including surface parking. It is the intent of this Plan that all natural slopes generally in excess of 15% be limited to the minimum density range.	**Consistent.** The Project would add 1 single-family dwelling unit on a lot zoned and designated for single-family residential and Low II Residential land uses, respectively.

a City of Los Angeles, Hollywood Community Plan, December 13, 1988, effective April 2, 2014.
Source (table): EcoTierra Consulting, 2022.

Planning and Zoning Code

All on-site development activity is subject to the City's Planning and Zoning Code. Development of the Project Site is subject to the development standards of the Los Angeles Municipal Code (LAMC), including Chapter 1, the Planning and Zoning Code and Section12.21 C 10, the Hillside Ordinance (Ordinance No. 184,802). The Project Site is zoned R1-1-HCR (One Family – Height District No. 1 – Hillside Construction Regulation Supplemental Use District). The Project Site is also located within a Hillside Area, a Very High Fire Severity Zone, and a Special Grading Area.[118]

The following paragraphs discuss the Project's compliance with the building standards of the LAMC.

Land Use

The Project Site is zoned R1-1-HCR (One Family – Height District No. 1 – Hillside Construction Regulation Supplemental Use District). The R1 zone allows for single-family residences. Therefore, the Project's proposed land uses would be allowed by the zoning.

Lot Size

The Project Site is approximately 5,025.8 square feet, consistent with the minimum lot size of 5,000 square feet for the R2-1 zone.

Floor Area

The Hillside Development Standards limit the RFA within hillside areas to lot-specific slope band analyses. Allowed RFA is based on the square-footage of the lot within ranges of slope steepness contained in Table 12.21 C.10-2a of the LAMC and the zoning of individual lots. The Project's allowable RFA is 1,206 square feet; the Project's proposed RFA would be 1,201 square feet not including the subbasement (948 square feet) and basement (951 square feet), as basements do not count toward RFA. Furthermore, pursuant to LAMC Section 12.21 C 10(b)(1), the Project would be required to submit a Slope Analysis Map based on a survey of the natural/existing topography, prepared, stamped, and signed by a registered civil engineer or licensed land

118 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: September 2022.*

surveyor, to LADB for verification of the slope band analysis or to DCP for discretionary approval as part of the Project's application for building permit.

Height

The project is subject to the height limitations in LAMC Section 12.21 C 10, which allows a maximum height of 28 or 33 feet, based on the slope of the roof of the building, based on a Maximum Envelope Height measurement. The Project would have a maximum height of 28 feet, consistent with the limits of the LAMC.

Setbacks

Pursuant to Table 12.21 C.10-1 of the LAMC, the Project Site is limited to: (1) a minimum front yard setback of 20 percent of the lot depth, which need not exceed 25 feet; (2) a side yard setback not less than 5 feet in the R1-1 zone; (3) and a minimum rear yard setback not less than 15 feet in the R1-1 zone.

The Project is requesting a Zoning Administrator's Determination for a front yard setback post-required LADOT and LAFD dedications and improvements. LAFD has determined that a turnaround is required in order to develop the property because of the location of the site at the terminus of a substandard hillside limited street. This turnaround would require a dedication of land between 2 feet and 19 feet 17.5 inches along the property frontage to create a turnaround on the substandard Marlay Drive at the terminus, adjacent to the proposed home. Because of this requirement, the Project Applicant is requesting a front yard setback below the prevailing front yard setback of 7.5 feet to accommodate the turn-around dedication of land. The Project would include a front yard setback between 2 inches and 19 feet 7.5 inches, after providing the required dedication of land.

The Project would provide side yard setbacks of 6 feet and a rear yard setback of 15 feet, consistent with the setback standards of the LAMC.

Parking

The Project's provision of a two-car garage would comply the parking space requirements of LAMC Section 12.21 C 10(g), which requires 2 covered parking spaces per residential unit.

Therefore, after approval of the requested Zoning Administrators Adjustment for a reduced front yard setback to accommodate the required dedication of land, the Project would be consistent with the City's Planning and Zoning Code.

Los Angeles Green Building Code

The current 2020 LA Green Building Code is based on the 2013 California Green Building Standards Code (commonly known as CALGreen), which was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential);
- Every building alteration with a building permit valuation of $200,000 or more (residential and non-residential);
- Residential alterations that increase the building's conditioned volume; and
- Every building addition (residential and non-residential)

The Project would meet the requirements in the LA Green Building Code. The building would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star®-rated appliances, water saving/low-flow fixtures (including all bathroom and plumbing fixtures), non-volatile organic compound paints/adhesives, drought-tolerant planting, and high performance building envelopment.

Summary

As detailed above, after approval of the requested Zoning Administrators Adjustment for a reduced front yard setback to accommodate the required dedication of land, the Project would be consistent with the applicable land use plans, policies, and regulations. Furthermore, the Project would be reviewed by numerous City departments, including the Department of City Planning, LADBS, LAFD, BOE, LADBS, and the Department of Transportation, and would be required to comply with all conditions imposed by those agencies in order to be consistent with the applicable department plans and policies. As such, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource and the project converted an existing or potential future regionally-important mineral extraction use to another reuse or if the project affected access to a site used or was potentially available for regionally-important mineral resource extraction.

The Division of Oil, Gas, and Geothermal Resources Online Mapping System was reviewed for information pertaining to oil and gas exploration on or nearby the subject property. No oil wells were identified within 500 feet of the subject property.[119] Additionally, the Project Site is not located within an oil field or oil drilling area,[120] nor within a surface mining district or MRZ-2 zone.[121] The Site is currently designated for low density residential land uses and not for mineral extraction land uses. Furthermore, the Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Accordingly, the Project would not result in the loss of availability of a known mineral resource of statewide or regional importance. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction and the project converted an existing or potential future locally-important mineral extraction use to another use or if the project affected access to a site used or potentially available for locally-important mineral resource extraction.

As detailed in response to Checklist Question XII(a) above, the Project would have no impact on known mineral resources because the Project Site is not classified as containing significant mineral deposits, is not designated for mineral extraction land uses, and is not located within an oil field or drilling area. The Project Site is not currently zoned for mineral extraction and neither the Site nor the surrounding area are used or designated as potentially available for the extraction of mineral resources. As such, the Project would not result in the loss of availability of a known

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119 *California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Well Finder Interactive Web Map, available at: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.37010/34.09963/15.*

120 *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996.*

121 *City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.*

mineral resource recovery site of local importance. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the Project Site to fail to comply with noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC). Implementation of the Project would result in an increase in ambient noise levels during both construction and operations, as discussed in detail below.

Regulatory Setting

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the state of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity

generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

State of California Noise Requirements

The state of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. state law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including the potential environmental noise impacts.

City of Los Angeles General Plan Noise Element

The City of Los Angeles has adopted a Noise Element of the General Plan to identify goals, objectives, and policies for managing noise issues within the City. The following goal and objectives are identified in the General Plan Noise Element:

Goal A city where noise does not reduce the quality of urban life.

Objective 1 Reduce airport and harbor related noise impacts.

Objective 2 Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Objective 3 Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

Exhibit I of the City of Los Angeles General Plan Noise Element identifies Guidelines for Noise Compatible Land Use to evaluate the potential impacts of transportation-related noise. Office buildings, business and professional commercial uses, such as the Project, are considered conditionally acceptable with unmitigated exterior noise levels of less than 77 dBA CNEL. For conditionally acceptable exterior noise levels, new construction or development may proceed only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

As discussed below, this analysis focuses on potential impacts to sensitive noise receptors. Within the Project Site vicinity, the closest sensitive receptors are the residential uses. Per the Noise Element, noise levels between 70 and 75 dBA CNEL are considered "normally unacceptable" and noise levels at 75 dBA CNEL and greater are considered "clearly unacceptable" for residential uses. Noise levels between 55 and 70 dBA CNEL are considered "conditionally acceptable" and

noise levels less than 55 dBA CNEL are considered “normally acceptable” for single-family residential uses.

City of Los Angeles Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the Project, stationary-source (operational) noise such as HVAC equipment and trash enclosure activity are typically evaluated against standards established under a jurisdiction’s Municipal Code or General Plan.

Chapter XI of the LAMC establishes Noise Regulations, setting exterior noise limits to control community noise impacts from commercial noise sources including air conditioning units, refrigeration, heating, pumping, and filtering equipment. Section 112.02 indicates that such equipment shall not operate in a manner as to cause the noise level at any sensitive use to exceed the existing ambient noise level by 5 dBA. Section 114.03 prohibits loading or unloading any vehicle, or operate dollies, carts, forklifts, or other wheeled equipment causing impulsive sound, raucous or unnecessary sound within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M of the following day. Also, Section 114.06 prohibits installation, operation or use of any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes.

City of Los Angeles Construction Noise Standards

The City of Los Angeles recently published construction noise and vibration thresholds[122] to be used by the Department of City Planning in assessing the environmental impacts of projects in accordance with the California Environmental Quality Act (CEQA). The new thresholds are intended to be suited to the generally urban nature of the city, while still recognizing the importance of human health, including sleep disruption. They are intended to account for reasonable expectations regarding construction noise and vibration during daytime and nighttime hours and also include absolute maximum noise levels that are intended to protect human health. These thresholds have been established based on input from a technical advisory committee of noise experts, as well as a review of noise thresholds used by other state and local agencies.

The following thresholds apply to both on- and off-site construction activities associated with a project.

Daytime Construction Activities

Daytime noise sensitive uses include single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; places of assembly including churches or houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; outdoor public recreational areas; and parks. This does not include private residential

122 *City of Los Angeles, 2024 Construction Noise and Vibration Updates to Thresholds and Methodology.*

balconies which may or may not extend past the exterior of a building, or to private outdoor spaces.

Daytime construction activities include those occurring between 7:00 AM to 7:00 PM Monday through Friday and between 8:00 AM and 6:00 PM on Saturdays. Applicable daytime construction noise standards are as follows:

- Increase Over Ambient Threshold: The City has decided to not establish a numerical threshold for increases in ambient noise levels during daytime hours.
- Absolute Threshold: The City has adopted an 80 dBA L_{eq} (8-hour) absolute threshold for construction noise as measured at the property line with outdoor uses or at the exterior of the building.

Nighttime Construction Activities

Nighttime noise sensitive uses include single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; nature and wildlife preserves; outdoor public recreational areas; and parks. This does not include private residential balconies which may or may not extend past the exterior of a building, or to private outdoor spaces.

Nighttime construction activities include those activities occurring between 7:00 PM and 7:00 AM Monday through Friday and between 6:00 PM and 8:00 AM on Saturdays, and anytime on Sundays or national holidays. Applicable nighttime construction noise standards are as follows:

- Increase Over Ambient Threshold: The City has established that increases in the ambient noise level that exceed 5 dBA at the property line with outdoor uses or at the exterior of the building would result in a substantial increase. Mat pour activities (and other types of concrete pour, which require an extended continuous pour beyond the allowable construction hours) that are required to occur during nighttime hours for less than five days are exempt from this provision.
- Absolute Threshold: The City has determined that the maximum exterior noise level at nighttime noise sensitive uses where sleep is expected shall not exceed the following:
    - 55 dBA L_{eq} at sensitive uses within older buildings that would have operable windows that may be open.
    - 65 dBA L_{eq} at sensitive uses with windows closed that are not operable and are single glazed.
    - 70 dBA L_{eq} at sensitive uses that have newer construction (e.g., the structures have been designed to ensure that an interior 45 dBA is obtained with double- paned windows). Certain mat pour activities are exempt from this provision.

- Mat pour activities (and other types of concrete pour, which require an extended continuous pour beyond the allowable construction hours) that are required to occur during nighttime hours for less than five days are exempt from this provision.

Significance Criteria

The City has determined that the Project's temporary or permanent increase in ambient noise levels in the vicinity of the Project Site shall be considered significant if any of the following occur as a direct result of the Project.

Off-Site Operational Traffic Noise

California courts have rejected use of what is effectively a single "absolute noise level" threshold of significance (e.g., exceed 65 dBA CNEL) on the grounds that the use of such a threshold fails to consider the magnitude or severity of increases in noise levels attributable to the project in different environments (see King and Gardiner Farms, LLC v. County of Kern (2020) 45 Cal.App.5th 814). California courts have also upheld the use of "ambient plus increment" thresholds for assessing project noise impacts as consistent with CEQA, noting however, that the severity of existing noise levels should not be ignored by incorporating a smaller incremental threshold for areas where existing ambient noise levels were already high (see Mission Bay Alliance v. Office of Community Investment and Infrastructure (2016) 6 Cal.App.5th 160).

It is widely accepted that the average healthy human ear can barely perceive changes of 3 dBA in an outdoor environment and that a change of 5 dBA is readily perceptible. Considering relevant case law, the project would result in a significant impact if:

- The addition of project trips on surrounding roadways causes noise levels to increase by:
    - +3 dBA in areas where the existing ambient noise level exceeds the "Normally Acceptable" threshold for affected land uses (per the Community Noise Exposure Thresholds); or
    - +5 dBA in any area.

Operational Stationary-Source Noise

Stationary source noise standards are established within Section 112.02 and 112.01 of the LAMC (see Regulatory Setting section of this report). Accordingly, the project would result in a significant impact if:

- Project operation of any air conditioning, refrigeration or heating equipment causes the noise level at an occupied residential use to exceed the ambient noise level by more than 5 dB (LAMC Chapter XI, Article 2, Section 112.02); or,
- Project operation of any machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source within any residential zone or within 500 feet of a residential zone or causes the ambient noise level at an occupied

residential use to exceed the ambient noise level by more than 5 dB (LAMC Chapter XI, Article 2, Section 112.01).

Construction Noise

Construction noise thresholds are identified within the City of Los Angeles's *Construction Noise and Vibration Updates to Thresholds and Methodology* (August 2024) (see Regulatory Setting section of this report). Accordingly, the project would result in a significant impact if:

- Project construction noise exceeds 80 dBA L_{eq} (8-hour) at a daytime noise sensitive use (at the property line with outdoor uses or at the exterior of the building) during the hours of 7:00 AM to 7:00 PM Monday through Friday and 8:00 AM and 6:00 PM on Saturdays; or,
- Project construction noise exceeds any of the following during the hours of 7:00 PM and 7:00 AM Monday through Friday, between 6:00 PM and 8:00 AM on Saturdays, and anytime on Sundays or national holidays:
    - Increase Over Ambient Thresholds:[123]
        - An increase of more than 5 dBA above the ambient noise level at nighttime noise sensitive uses (at the property line with outdoor uses or at the exterior of the building).
    - Absolute Thresholds:[138]
        - 55 dBA L_{eq} for sensitive uses within older buildings that would have operable windows that may be open.
        - 65 dBA L_{eq} for sensitive uses with windows closed that are not operable and are single glazed.
        - 70 dBA L_{eq} for sensitive uses that have newer construction (e.g., the structures have been designed to ensure that an interior 45 dBA is obtained with double-paned windows). Certain mat pour activities are exempt from this provision.

Existing Noise Level Measurements

Due to adverse weather conditions in the Los Angeles area during the late December and January,[124] no existing noise measurements were obtained. However, the LAMC Section 111.03 indicates that, in cases where the actual ambient noise conditions are not known, the City's presumed daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) minimum ambient noise levels should be used, as shown in **Table 8**. For example, for residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 40 dBA during the

123 *Mat pour activities (and other types of concrete pour, which require an extended continuous pour beyond the allowable construction hours) that are required to occur during nighttime hours for less than five days are exempt from this provision.*

124 *Source: https://www.nytimes.com/2023/01/05/us/california-storm-weather.html*

nighttime. According to LAMC Section 111.03, where the ambient noise level is less than the presumed ambient noise level shown in **Table 8**, the presumed ambient noise level is to be considered the minimum ambient noise level.

Table 8
Presumed Ambient Noise Levels

Zone [a]	Presumed Ambient Noise Level (dBA)	
	Day (7am to 10pm)	Night (10pm) to 7am)
Residential (A1, A2, RA, RE, RS, RD, RW1, RW1, RW2, R1, R2, R3, R4, and R5)	50	40
Commercial (P, PB, CR, C1, C1.5, C2, C4, C5, and CM)	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

a At the boundary between two zones, the presumed ambient noise level of the quieter zone is to be applied.
Source: Los Angeles Municipal Code, Section 111.03

Construction Noise Levels

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment are expected to occur in the following stages:

- Site Preparation/Excavation
- Grading
- Foundation and Building Construction
- Architectural Coating

The Project is anticipated to start construction no sooner than third quarter of 2026, require approximately 26 months to complete, and is anticipated to be operational in 2028.

The Project Site is located within an urbanized setting in the Hollywood Hills area of the City within the Hollywood Community Plan area. The surrounding area is characterized by single family residential uses and vacant undeveloped land, which are zoned R1-1-HCR and RE9-1-HCR. The property to the immediate north is a locally designated Historic-Cultural Monument listed on the California Register of Historical Resources and the National Register of Historic Places. The property to the west of the Project Site is Marmont Manor.

The closest sensitive receptors to the Project Site include: the single-family dwelling units located adjacent to the north of the Site, the single-family dwelling units located approximately 50 feet to the east of the Project Site and across Marlay Drive, approximately 20 feet from the Project Site, and the single-family dwelling units located approximately 100 feet south of the Project Site, north of Hollywood Boulevard.

The closest noise and vibration sensitive receptors to the Project Site include:

- The single-family residential use located approximately 10 feet north of the Project Site, on the south side of Woods Drive,

- The single-family residential use located approximately 50 feet east of the Project Site, on the northern side of Marlay Drive,
- The single-family residential uses located approximately 20 feet south of the site, on the on the southern side of Marlay Drive, and
- Marmot Manor, who's closest building is located approximately 110 feet southwest of the Project Site.
- The Stahl House is a vibration-sensitive receptor (a historic resource open to the public) that is located approximately 10 feet from the northern boundary of the Project Site.

Other noise sensitive land uses are located further from the Project Site and would experience lower impacts. Construction noise will vary depending on the construction process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work.

A summary of noise level data for a variety of construction equipment compiled by the FTA is presented in **Table 9, Noise Range of Project Construction Equipment**. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings.

Table 9
Noise Range of Project Construction Equipment

Equipment Description	Impact Device?	Acoustical use Factor (%)	Typical Noise Level @ 50 ft (Lmax dBA)
Compressor (air)	No	40	78
Concrete Mixer Truck	No	40	79
Concrete Pump	No	20	81
Concrete Saw	No	20	90
Crane	No	16	81
Drill Rig	No	20	79
Dozer	No	40	82
Forklift [a, b]	No	50	61
Front End Loader	No	40	79
Generator	No	50	81
Grader	No	40	85
Haul/Dump Truck	No	40	76
Paver	No	50	77
Pickup Truck	No	50	77
Roller	No	20	80
Tractor/Loader Backhoe	No	40	79
Welder/Torch	No	40	74

Table 9
Noise Range of Project Construction Equipment

Equipment Description	Impact Device?	Acoustical use Factor (%)	Typical Noise Level @ 50 ft (Lmax dBA)
a Noise Testing Workplace Noise Consultants, Warehouse & Forklift Noise Exposure, by Carl Stautins, November 4, 2014, http://www.noisetesting.info/blog/carl-strautins/page-3/.			
b Data provided Leq as measured at the operator. Sound Level at 50 feet is estimated.			
Source: FHWA RCNM User's Guide, 2006.			

Construction noise associated with the Project was calculated utilizing methodology presented in the FTA Transit Noise and Vibration Impact Assessment Manual (2018) together with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the Project Site. Distances to receptors were based on the distance from the structural façade of the receptor to the acoustical center of the proposed construction activity. Construction noise levels were calculated for each phase. To be conservative, it was assumed that all the pieces of equipment in each phase would be operating concurrently and the noise generated by each piece of equipment was added together for each phase of construction; however, it is unlikely (and unrealistic) that every piece of equipment will be used at the same time, at the same distance from the receptor, for each phase of construction. The highest noise levels during each construction phase at the closest receptors are presented in **Table 10**, and worksheets are included as **Appendix F** to this document.

Without considering the effect of any additional Environmental Protection Measures or Additional Noise and Vibration Standards incorporated into the Project, the highest Project construction noise levels at the nearest sensitive receptors during construction are shown in **Table 10, Construction Noise Levels at Closest Receptor Locations Without Environmental Protection Measures or Additional Noise and Vibration Standards**. As shown in Table 10, the highest construction noise levels, which would occur during the grading phase, would not exceed the daytime 80 dBA Leq construction noise threshold at the residential receptors located east of the Project Site and south of the Project Site; therefore, no mitigation is required.

Table 10
Construction Noise Levels at Closest Receptor Locations Without Environmental Protection Measures or Additional Noise and Vibration Standards

Off-Site Receptor Location	Maximum Construction Noise Levels [a]	Applicable Standard (dBA) [b]	Exceeds Standard?
Adjacent residential receptor to the north [c]	70.1	80	No
Residential receptor to the east	78.4	80	No
Residential receptor to the south	79.3	80	No
Marmot Manor residential receptor	73.5	80	No

a Construction noise worksheets showing noise levels for all phases of construction are provided in Appendix F.
b The applicable noise standard is 80 dBA Leq (8 hour).
c The residential receptor to the noise is elevated on a hillside by approximately 17 feet above the project site; therefore, the noise levels reported include attenuation for the berm/elevation. Per FHWA Highway Noise Barrier Design Handbook (2000), Page 26, berms can attenuate up to 23 dBA. Additionally, the receptor location is a least 17 feet above the Project Site and surrounded by an approximately 5-foot-high wall/glass barrier. Therefore, the construction activity is anticipated to be below the line-of-sight of this receptor.
Source: EcoTierra, 2025.

Environmental Protection Measures/Noise and Vibration Standards

The City of Los Angeles Construction Noise and Vibration Updates to Thresholds and Methodology document (2024) provides Environmental Protection Measures and Noise and Vibration Standards (EPMs/NVs) that have been drafted into several individual Community Plan updates which comprise the City's General Plan Land Use Element. For projects within community planning areas not currently being updated, EPMs can be made standard conditions of approval. Hence, the proposed project will be subject to compliance with the following EPMs, as slightly modified by a noise professional per said document, will be provided on project plans.

NV1-1 Power construction equipment (including combustion engines), fixed or mobile, will be equipped with noise shielding and muffling devices consistent with manufacturers' standards or best available control technology. All equipment will be properly maintained, and the applicant or owner will require any construction contractor to keep documentation on-site during earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

NV1-2 Driven (impact) pile systems shall not be used, except in locations where the underlying geology renders drilled piles, sonic, or vibratory pile drivers infeasible, as determined by a soils or geotechnical engineer and documented in a soils report.

NV1-3 All outdoor mechanical equipment (e.g., generators, compressors, concrete/industrial saws) shall be enclosed or visually screened. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line of sight between the equipment and any off-site noise-sensitive uses.

NV1-4 Construction staging areas shall be located as far from Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving what constitutes 'as far as possible' shall be upon the Applicant or Owner, in consideration of the above factors.

It is recommended that the Project incorporate the EPMs/NVs detailed above to reduce construction noise to the extent feasible. However, as construction noise does not exceed City of Los Angeles construction noise thresholds, construction noise impacts would be less than significant.

Off-Site Construction Noise Impacts

The highest potential for off-site construction noise is sourced from hauling trips. During the grading duration of 45 days, the Project would generate approximately eight haul truck trips per day (four inbound, four outbound) travelling to and from the Project Site. Approximately 2,991 cubic yards of soil would be exported from the Project Site. The route involves Marlay Drive to Crescent Heights, to Hollywood Boulevard, to La Brea Avenue, to the Franklin Avenue, to Highland Avenue, to Hollywood Freeway (Interstate 101). Exported materials would be disposed at the Puente Hills landfill in the City of Whittier (soil only), Bradley Landfill and Recycling Center in Sun Valley, and/or at the Atkinson Brickyard site in the City of Compton. As shown in Table 9 above, typical noise from haul trucks driving by can reach up to 76 dBA Lmax at a distance of 50 feet. As the intermittent haul truck noise would be similar to trash truck noise from trash trucks that already service the area, the noise level from a passing haul truck would be similar to existing noise levels and the small number of haul trucks added to the existing daily traffic per day is not likely to double the existing traffic **volume on roads within the Project's vicinity and thus would not increase the noise level by 3 dBA. Therefore, impacts from off-site construction noise would be less than significant and no mitigation measures are required.**

Off-Site Operational Noise Impacts

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. The traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur.[125] As the Project is a single-family dwelling and did not meet the threshold requirement to do any kind of traffic analysis for the City of Los Angeles, the Project is not anticipated to generate a doubling of traffic volumes on any roadways within the Project vicinity. The noise impact from Project-related traffic is considered to be less than significant.

Stationary Operational Noise Sources

HVAC

As part of the Project, HVAC units, and exhaust fans would be installed for the proposed residential use. Based on estimated A-weighted noise ratings published for standard HVAC equipment,126 sound power from rooftop mounted HVAC equipment would be expected to range from 69 dBA Leq to 74 dBA Leq at the source. Sound power is the sound energy released from a source, which cannot be heard, while sound pressure is the sound that is heard based on the environment and distance to a receptor. By converting a 74-dBA sound power level at a source to sound pressure levels at 50 feet using standard acoustical fundamentals and formulas,127 the sound pressure level for HVAC equipment would be approximately 39.9 dBA at 50 feet which

125 *Derived from Decibel Addition, Equation, Eq. B-3, page 201, FTA Transit Noise and Vibration Impact Assessment Manual and page 210.*

126 *Carrier Corporation, Product Data Sheet for 25HBC5 Base 15 Heat Pump with Puron Refrigerant (1½ to 5 Nominal Tons.*

127 *Daikin, HVAC Acoustic Fundamentals, Application Guide 31-010, Calculating Sound Pressure from Sound Power, pg. 16.*

would be the noise level at the closest sensitive receptor (located approximately 50 feet to the south of the proposed residential building). As shown the renderings for the Planning Set, the proposed Project will be built into the hillside and enclosed by retaining walls; therefore, any HVAC operational noise directed to the east would be attenuated by the retaining walls. Therefore, noise levels from use of HVAC are not anticipated to exceed existing noise levels at sensitive receptor locations in the Project vicinity.

Although the operation of this equipment would generate noise, the design of all of the Project's mechanical equipment would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 decibels.

Therefore, impacts related to stationary noise sources would be less than significant with compliance with existing LAMC regulations. No mitigation measures are required.

Mitigation Measures

None required.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Per the FTA Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings, but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. [128]

Significance Criteria

Construction Vibration

The City of Los Angeles has established thresholds of significance concerning groundborne vibration for construction activities in the Construction Noise and Vibration Updates to Thresholds and Methodology (August 2024). Accordingly, the project would result in a significant impact if:

- Groundborne vibration levels generated by the project have the potential to cause architectural damage at nearby buildings by exceeding the following:
    - Fragile Buildings: 0.1 PPV
    - Historic Buildings: 0.25 PPV
    - Older Residential Structures: 0.3 PPV
    - New Residential Structures: 0.5 PPV
    - Modern Industrial/Commercial Buildings: 0.5 PPV
- Groundborne vibration levels generated by the project have the potential to cause annoyance at sensitive receptors by exceeding the following:
    - For construction activities that occur between 7:00 AM and 7:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on Saturdays, there is no numerical threshold related to human annoyance.
    - During nighttime hours (between 7:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturdays), and anytime on Sundays or national holidays, construction activities shall not generate groundborne vibration levels that exceed 80 VdB at the exterior of a sensitive use building.

Construction Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. The Project's construction activities most likely to cause vibration impacts are:

[128] *FTA 2018. Transit Noise and Vibration Impact Assessment Manual. September. Section 5, pages 112-113. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.*

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.

- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Table 11, Construction Equipment Vibration Source Levels, identifies various PPV levels for the types of construction equipment that would operate during the construction of the Project. For example, as shown in Table 11, a vibratory roller could generate up to 0.21 PPV at a distance of 25 feet; and operation of a large bulldozer (0.089 PPV) at a distance of 25 feet (two of the most vibratory pieces of construction equipment). Groundborne vibration at sensitive receptors associated with this equipment would drop off as the equipment moves away. For example, as the vibratory roller moves further than 100 feet from the sensitive receptors, the vibration associated with it would drop below 0.0026 PPV. It should also be noted that these vibration levels are reference levels and may vary slightly depending upon soil type and specific usage of each piece of equipment.

Table 11
Construction Equipment Vibration Source Levels

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level (L_V) at 25 feet
Pile driver (impact)	1.518 (upper range) 0.644 (typical)	112 104
Pile driver (sonic)	0.734 upper range 0.170 typical	105 93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall)	0.008 in soil 0.017 in rock	66 75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, Table 7-4. September 2018.

Annoyance to Persons

The primary effect of perceptible vibration is often a concern. However, secondary effects, such as the rattling of a china cabinet, can also occur, even when vibration levels are well below perception. Any effect (primary perceptible vibration, secondary effects, or a combination of the two) can lead to annoyance. The degree to which a person is annoyed depends on the activity in which they are participating at the time of the disturbance. For example, someone sleeping or reading will be more sensitive than someone who is running on a treadmill. Reoccurring primary and secondary vibration effects often lead people to believe that the vibration is damaging their home, although vibration levels are well below minimum thresholds for damage potential.

Per the FTA Transit Noise and Vibration Impact Assessment Manual (September 2018), land uses sensitive to vibration include: buildings where people normally sleep, such as dwelling units, hotels, and hospitals; research and manufacturing facilities that are vibration-sensitive such as hospitals with vibration-sensitive equipment and universities conducting physical research operations; and institutions and offices that have vibration-sensitive equipment and have the potential for activity interference such as schools, churches, and doctors' offices. Further, the FTA states that commercial or industrial locations including office buildings are not included in this category, unless there is vibration-sensitive activity or equipment within the building.[129]

Per the CalEEMod modeling (provided in **Appendix A**), a large bulldozer and caisson drill would be the most vibratory pieces of equipment expected to be used at the Project Site. Vibration worksheets are provided in **Appendix F** of this document.

The nearest off-site buildings that house vibration-sensitive receptors are the residential uses located north of the site, off of Woods Drive, approximately 17 feet[130] above the Project Site boundary. The next closest vibration-sensitive receptors are located approximately 20 feet south of the Project Site boundary, on the southern side of Marlay Drive. To be conservative, these distances represent the closest a piece of equipment could come to the building façade of the sensitive receptors as the equipment passes by the Project Site boundary. Other vibration sensitive land uses are located farther from the Project Site and would therefore experience lower impacts.

At a distance of 17 feet, use of a large bulldozer or caisson drill would be expected to generate 92.02 VdB.[131] However, as the use of a large bulldozer or caisson drill would only occur during normal daytime construction hours (7:00 AM and 7:00 PM, Monday through Friday and between 8:00 AM and 6:00 PM on Saturdays), vibration-related annoyance impacts would be less than significant.

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129 *FTA 2018. Transit Noise and Vibration Impact Assessment Manual. September. Section 6, page 124. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf*

130 *Distance from the building façade to the Project boundary.*

131 *Based on the 2018 FTA Transit Noise and Vibration Impact Assessment Manual vibration equation 7-3: Lv.distance = Lvref – 30 log (D/25), where Lv.distance is the vibration level adjusted for distance, VdB; Lvref is the source reference vibration level at 25 feet, VdB; and D = distance from the equipment to the receiver. Page 185.*

Architectural Damage

Vibration generated by construction activity generally has the potential to damage structures. This damage could be structural damage, such as cracking of floor slabs, foundations, columns, beams, or wells, or cosmetic architectural damage, such as cracked plaster, stucco, or tile.

The City identifies a PPV level of 0.3 as the threshold at which there is a risk to older residential structures and PPV level of 0.25 as the threshold at which there is a risk to historic buildings. The closest vibration-sensitive building is Stahl House. As identified and further discussed in Section V, Cultural Resources, the Stahl House is located directly above the Project Site at 1635 Woods Drive.

The Stahl House (17 feet to the north) would be subject to construction vibration levels of 0.159 in/sec PPV from a large bulldozer/caisson drill. The threshold for historic buildings is 0.25 in/sec PPV; therefore, as the vibration level does not exceed the threshold for historic buildings, the historical use would not be impacted by construction vibration.

Potential architectural damage to the Stahl House is further discussed above under Section V, Cultural Resources. Although vibration at the Stahl House will be less than the threshold for potential architectural damage as discussed above, the Potential Physical Impacts Report (see **Appendix C.2**) prepared by Structural Focus concludes that hillside construction of the Project recommends additional strategies to prevent any adverse physical impacts to the neighboring Stahl House. These recommendations have been incorporated into the Historical Resource Monitoring and Protection Plan, which is required by mitigation measure **MM CUL-2**. As required by the Historical Resource Monitoring and Protection Plan, the use of core drilling in lieu of impact drilling will result in the observed PPV at 25 ft of .089 in/sec, comfortably lower than both the widely accepted damage threshold for residential structures of 2.0 in/sec published by Svinkin, and the vibration receptor limit of 0.25 in/sec provided by the LA Department of City Planning.[132] As the direct vibration travel distance through the soil is greater than 75 feet to the Stahl House, utilizing core drilling will significantly contribute to the prevention of damage to the Stahl House caused by construction at the Project Site. **MM CUL-2** will ensure that the vibration limit is not exceeded, slope movement does not occur, and no damage or displacement occurs at the adjacent Stahl House property. Therefore, impacts from construction-related groundborne vibration to buildings would be less than significant with mitigation.

Mitigation Measures

MM CUL-2 Implementation of Historical Resource Monitoring and Protection Plan

A detailed Historical Resource Monitoring and Protection Plan (Attachment C to the HRA, which is **Appendix C.1** to this Initial Study) was prepared in consideration of potential impacts to the adjacent Stahl House resulting from vibration and slope instability. The Applicant shall ensure that all of the required elements of the Plan are adhered to throughout the various stages of pre-

[132] *City of Los Angeles, Department of City Planning, Construction Noise and Vibration Updates to Thresholds and Methodology, August 2024.*

construction, construction, and post-construction, and that all training, monitoring, and reporting requirements are completed in accordance with the schedule outlined in the Plan. The project's structural engineer, architectural historian, and on-site construction manager shall be empowered to halt all construction activity that falls out of compliance with the Plan or poses a physical threat to the Stahl House. No construction activity may resume until the threat is analyzed, preventative measures are put in place, and approval is provided by both the project's structural engineer and architectural historian.

Operational Vibration

As the Project is a residential use, it is not considered to be a significant source of operational vibration. No additional analysis is warranted or required. Therefore, the Project would not cause excessive groundborne vibration or groundborne noise levels and impacts are less than significant.

Mitigation Measures

None required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact would occur if the project were located in the vicinity of a private airstrip or an airport land use plan and would expose people residing or working in the project area to excessive noise levels.

The nearest airport to the Project Site is the Bob Hope Airport in Burbank, which is located approximately 6.5 miles northeast of the Project Site. The Project Site is not located within the Airport Influence Area of Bob Hope Airport.[133] Moreover, the Project Site is not located within an existing or projected noise contour associated with any private or public airport.[134] Therefore, no impacts would occur, and no mitigation measures are required.

Mitigation Measures

None required.

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133 *Los Angeles County Airport Land Use Commission, Airports and Airport Influence Areas, website: http://planning.lacounty.gov/assets/upl/project/aluc_airport-burbank.pdf accessed: August 2022.*

134 *Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004; website: http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf; accessed: August 2022.*

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact may occur if a project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction

Construction would involve development of a single-family residence. Construction would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the City. As such, it would not be expected that construction workers would relocate their homes as a result of employment on the Project.

Operation

The Project would develop a single-family residence on a currently vacant lot. The Project would not include commercial uses and would, therefore, not generate new employment on-site; however, it would generate additional housing and residential population. The Project Site is located within the jurisdiction of SCAG. As part of its comprehensive planning process for the Southern California region, SCAG is responsible for preparing population, employment, and

housing projections for the region and its 15 subregions. The Project Site is located within the City of Los Angeles subregion. SCAG's most recent Local Profiles Report for the City of Los Angeles estimates 2018 population numbers for the City.[135] SCAG's most recent RTP/SCS projects what population, housing, and employment numbers for the City will be in 2045.[136] Using estimates from the City's Local Profiles Report and the region's RTP/SCS, between 2023 (the Project's baseline year) and 2045 (the regional planning horizon year), population within the City is projected to increase by approximately 613,321 people,[137] while housing within the City is projected to increase by approximately 269,959 units.[138]

Population

Using a population generation rate of 3.15 residents per single-family residence,[139] the Project would increase the residential population at the Site and in the City by 4 residents.[140] The Project's 4 new residents would represent negligible percentage of the projected 613,321 population increase during the planning horizon. As such, the Project's increase in residential population would be within the increase in population projected by SCAG for the City during the regional planning period and would not result in substantial or unplanned direct population growth.

Housing

The Project would develop one new single-family residence, which would represent a negligible percentage of the projected 269,959-unit increase in housing during the planning period. As such, the Project's increase in housing would be within the increase in housing projected by SCAG for the City during the regional planning period and would not result in substantial or unplanned direct housing growth.

Infrastructure

The Project would include development of utilities infrastructure such as water lines, sewer laterals, electric power and natural gas lines, and telecommunication cables; however, all utilities installations would occur on-site and would serve the Project residence. Furthermore, the Project Site is currently served by utilities and is located in a developed, urbanized area of the City. The residential use proposed by the Project would be consistent with the zoning of the Project Site

135 *Southern California Association of Governments, Local Profiles Report 2019, Profile of the City of Los Angeles, May 2019, page 3.*

136 *Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics & Growth Forecast Technical Report, September 3, 2020, Table 14: Jurisdictional-Level Growth Forecast, page 35.*

137 *Increase in population was calculated by subtracting the 2022 population (4,157,979 people) from the 2045 population (4,771,300 people). 2022 population was interpolated between the 2019 Local Profile Report's population estimate for 2018 and the RTP/SCS's population projection for 2045.*

138 *Increase in housing units was calculated by subtracting the number of housing units in 2022 (1,523,041) from the number of housing units in 2045 (1,793,000). Number of housing units in 2022 was interpolated between the 2019 Local Profile Report's population estimate for 2018 and the RTP/SCS's housing projection for 2045.*

139 *City of Los Angeles, Department of Transportation and Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, Table 1: Land Use and Trip Generation Base Assumptions, pages 10-11.*

140 *Rounded up.*

and with existing land uses in the immediate surrounding area, and would be compatible with allowed uses in the City's General Plan and the Hollywood Community Plan. The Project would not require and does not propose increases or expansions of off-site utilities into undeveloped areas. Minor local upgrades and connections to off-site utilities may be required; however, all such upgrades and connections would serve to increase capacity for the Project and existing local land uses, and would not significantly increase the potential for expansive development in the local vicinity or regional area.

Summary

Based on the above, the **Project would not induce substantial unplanned population growth during construction or operation. Therefore, impacts would be less than significant and no mitigation measures would be required**.

Mitigation Measures

None required.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in displacement of existing people or housing units, necessitating construction of replacement housing elsewhere.

The Project Site is currently vacant and undeveloped and no housing or people currently exist on the Project Site. Therefore, no people or housing would be displaced and replacement housing would not be required. No impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				

a. Fire Protection?	☐	☐	☒	☐
b. Police Protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other Public Facilities?	☐	☐	☒	☐

a) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Fire prevention, fire suppression, and life safety services in the City are provided by the City of Los Angeles Fire Department (LAFD). Project impacts regarding fire services are evaluated by the LAFD on a project-by project basis. The LAFD does not determine the adequacy of fire protection based on response times or number of EMS or fire-related incidents. The major criteria for determining the need for a new or expanded fire station, and thus, the impact of a project, is based on the proposed land uses and project components, and compliance with standards set forth in the Los Angeles Building Code and Fire Code, particularly as they pertain to response distance for engine and truck companies, fire hydrant standards and fire flow, and emergency access/evacuation.

The Project Site is located within LAFD's West Bureau which is broken down into three battalions (Battalions 4, 5, and 9).[141] There are two LAFD fire stations located within a 2-mile radius of the Project Site as detailed in **Table 12, Fire Stations Serving the Project Site**.

Table 12
Fire Stations Serving the Project Site

Fire Station and Address	Distance to Project Site (miles)	Equipment & Services
Fire Station No. 41 1439 N. Gardner Street	1.0 SE	Engine 41; EMS Rescue Ambulance 41 (ALS), EMS Rescue Ambulance 841 (BLS), Brush Patrol
Fire Station No. 97 8021 Mulholland Drive	1.8 N	Engine 97; EMS Rescue 97 (ALS)
SE = southeast; N = north; EMS = emergency medical services; ALS = advanced life support; BLS = basic life support *Sources: Los Angeles Fire Department, Find Your Station Website, https://www.lafd.org/fire-stations/station-results; and California Fire and EMS, http://www.cafirefighters.com/lafd.htm.*		

Construction

Construction on the Project Site would increase the potential for accidental fires from sources such as mechanical equipment and flammable construction materials. Given the nature of construction activities and the work requirements of construction personnel, OSHA has developed

141 *Los Angeles Fire Department, West Bureau website https://www.lafd.org/about/west-bureau, accessed August 15, 2022.*

safety and health provisions for implementation during construction, which are set forth in Title 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[142] Additionally, in accordance with the provisions established by OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[143] The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and Federal regulations governing such activities. The Project would be required to implement standard best management practices (BMPs) set forth by the City and the RWQCB, which would ensure that waste generated during the construction process are disposed of properly. Compliance with these regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. However, the Project applicant is required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Hillside Development Construction Traffic Control Plan has been prepared for the Project, and subsequently reviewed and approved by LADOT.[144] The approved Hillside Development Construction will be implemented during the entire construction period and will minimize the potential for conflicts or impairment of fire protection service response.

Operation

As previously described, the LAFD does not determine the adequacy of fire protection based on response times or number of EMS or fire-related incidents. The following analysis evaluates the major criteria for determining the impacts of the Project to fire protection services, including proposed land uses and project components, and compliance with standards set forth in the Los Angeles Building Code and Fire Code, particularly as they pertain to response distance for engine and truck companies, fire hydrant standards and fire flow, emergency access/evacuation, and any other site- or project-specific requirements pursuant to the LAMC.

Land Uses and Project Components

As detailed in Section II, *Project Description*, of this Draft EIR, the Project would develop a sing-family residence on a currently vacant, undeveloped lot. Therefore, the Project would result in an

142 *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.*

143 *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.*

144 *1501 N. Marlay Drive, Hillside Development Construction Traffic Management Plan, ZA-2017-2328-ZAD-ZAA, Approval by Wes Pringle, February 1, 2021.*

increase in the intensity of land uses at the Site, which could potentially increase the demand for LAFD fire protection and emergency medical services.

The proposed use would be expected to generate a range of fire service calls similar to other residential uses that would potentially include electrical fires, grease fires, etc. However, the Project would not include any unique or especially hazardous components, such as heavy industrial uses, that use or generate large quantities of hazardous and/or flammable materials. Furthermore, as detailed in response to Checklist Question IX(a), the Project would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development.

Compliance with Building and Fire Codes

The Project would implement all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., as well as any project- and/or site-specific conditions that may be set forth by the LAFD as part of their fire/life safety plan review and fire/life safety inspection pursuant to LAMC Section 57.111. Compliance with applicable Building Code and Fire Code requirements and LAFD conditions would be confirmed prior to the issuance of a building permit. Such regulatory requirements and conditions are intended to ensure that adequate fire prevention features that reduce the demand on LAFD facilities and equipment are provided. Therefore, through their incorporation into the Project, the Project would minimize the potential for incidents requiring emergency response by the LAFD.

Response Distance

The Project Site would continue to be served by Fire Station No. 41, which is the designated "first-in" station for the Project Site. The secondary station within a 2-mile radius of the Project Site that could respond to the Site is Fire Station No. 97. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2017 City of Los Angeles Fire Code, the maximum response distance between residential land uses and a LAFD fire station with an engine company is 1.5 miles, and the maximum response distance from fire stations with a truck company is 2.0 miles. If either of these distances were exceeded, all structures located in the applicable residential area would be required by LAMC Section 57.512.2 to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance. Based on these criteria, as well as the residential land use proposed by the Project, the Project would not be within the maximum response distance of a truck company, as neither Station 41 nor Station 97 has a truck. Accordingly, the proposed residence would be fully sprinklered. The sprinklers would be automatic and would be designed and installed pursuant to NFPA standards and, following their installation, the Project would meet LAMC requirements for adequate fire protection with regard to response distance alternatives.

Hydrant Standards and Fire Flow

Domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC

Section 57.507.3.1, which establishes fire flow standards by development type. As identified in the LAMC, low-density residential land uses such as those proposed by the Project are required to achieve a fire flow rate of 2,000 gpm from three adjacent hydrants flowing simultaneously. Additionally, fire hydrants must be spaced to provide adequate coverage of the building exterior, as set forth in Section 57.507.3.2 of the LAMC, and must deliver a minimum pressure of 20 psi at full flow.

The Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. Specifically, the primary duties of the LAFD Fire Development Services Unit is to conduct Fire Life Safety Plan Checks and Fire Life Safety Inspections, which aim to enforce applicable standards of the California Fire Code (Title 24, Part 9), California Code of Regulations Title 19, and the Los Angeles Fire Code (LAMC Chapter 5, Article 7). Furthermore, the LAFD Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement. The final fire flow required for the Project would be established by the LAFD during its review of the Project plot plan, prior to the issuance of a building permit by the City. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow and hydrant spacing would be confirmed by LAFD during the plan check review process. Approval of a plot plan identifying the minimum fire flow requirements, locations of hydrants, and upgrades to water main lines would ensure the requisite fire flow for the Project Site.

Installation of the Project's water meter would be done by LADWP and would include new hot taps, laterals, and detector checks for the meter. Fire service water would be piped into the building from the meter. Backflow preventers, fire water tanks and fire pumps would be documented on the plumbing drawings, prepared at the time the building design is submitted to the City and LAFD for review. Review of project plans is intended to ensure compliance with fire hydrant standards and fire flow requirements and would ensure that the LAFD would have adequate resources for fire protection services at the Project Site.

Emergency Access and Evacuation

Emergency vehicle access to the Project Site would be provided from Marlay Drive. The Project's driveway would meet all applicable Los Angeles Building Code and Fire Code requirements. Compliance with such requirements would be confirmed as part of the LAFD's fire/life safety plan review and fire/life safety inspection pursuant to LAMC Section 57.118, prior to the issuance of any building permit. In addition, the Project would not include the installation of any barriers that could impede emergency vehicle access and does not require or propose the permanent re-routing or closure of any public roadway. As such, emergency access to the Project Site and the surrounding area would be maintained and the Project would not interfere with emergency evacuation of the vicinity.

Other Fire Protection Facilities

The Project Site is located within a Very High Fire Hazard Severity Zone and would, accordingly, be required to incorporate the special fire-resistance and fire-protection requirements established

in LAMC Section 91.7207 with regard to unenclosed under-floor areas, utilities, attic openings, and roofing, as well as the wildfire protection and vegetation clearance requirements of the California Fire Code Section 4905 and Section 4906, respectively. Consultation with the City and LAFD prior to the issuance of building permits would ensure that the Project adequately complies with the additional requirements imposed on sites located within the Very High Fire Hazard Severity Zone.

Conclusion

Based on the above, the Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service levels and the Project would not interfere with or otherwise inhibit LAFD emergency access or evacuation of the Project Site or surroundings. Therefore, neither construction nor operation of the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. As such, Project impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective. Police protection services in the City are provided by the Los Angeles Police Department's (LAPD) four geographically-defined bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau and the 21 community police stations within them. According to the City's L.A. CEQA Thresholds Guide, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and type of calls for service. Changes in these factors resulting from a project may affect the demand for services and, in turn, new or physically altered governmental facilities. As such, an analysis of potential impacts to police protection services presents statistical averages associated with the police station serving the Project Site and Citywide services and, based on guidance from the LAPD, focuses on the increase in the residential population that would be generated.

The Project Site is located in the LAPD's West Bureau and is served by the Hollywood Community Police Station (Hollywood Station).[145] Located at 1358 N. Wilcox Avenue, approximately 2.3 miles east of the Project Site, the Hollywood Station serves an approximately 17.2-square-mile area with approximately borders of Mulholland Drive on the north, Normandie Avenue on the east,

[145] *Los Angeles Police Department, Find your Local Police Station, available at: https://www.lapdonline.org/find-your-local-police-station/.*

Beverly Boulevard on the south, and West Hollywood on the west.[146] The Hollywood Community Police Station has 387 sworn personnel and 15 civilian support staff and provides service to a population of approximately 300,000 residents.[147]

Construction

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, as required by the City as a regulatory compliance measure, the Project would employ construction safety features including erecting temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. With implementation of these security measures, the potential demand for police protection services at the Project Site during construction would be reduced and Project construction would not contribute to an increased demand for police protection services.

Construction activities also have the potential to affect police protection services by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. However, the Project applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits.

Operation

As previously discussed, LAPD considers the residential population within a given service area when evaluating service capacity. As detailed in response to Checklist Question XIV(a), the Project would generate an increase in residential population of 4 people. No official standard has been set by the City with respect to officer-to-population ratio. Regardless, an increase in service population for the Hollywood Station of 4 people would not have the potential to alter the existing officer-to-population ratio. Furthermore, when situations arise requiring increased staffing, additional officers can be called in from other LAPD community police stations. In addition, there are special service teams available within the LAPD to serve the Hollywood area.

With regard to the potential for Project traffic to increase emergency vehicle response times within the Hollywood Station service area due to increased congestion, police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access the Project Site and surrounding vicinity when responding to an emergency call. Regardless, pursuant to CVC Section 21806, the police have a variety of options to avoid traffic in the event of an emergency, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Therefore, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

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146 *Los Angeles Police Department, Hollywood Community Police Station, Division Map, available at: https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/03/HWD11x17.pdf.*

147 *Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department.*

Conclusion

Based on the above, the Project would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service levels and the Project would not interfere with or otherwise inhibit LAPD response to the Project Site or surroundings. Therefore, neither construction nor operation of the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. As such, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Schools?

Less Than Significant Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the project site.

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD) and is served by, among others, the following schools:[148]

- Laurel Cinematic Arts Creative Tech Magnet, serving grades K-8, located at 925 N Hayworth Avenue
- Gardner Street Elementary, located at 7450 Hawthorn Avenue;
- West Hollywood Community Day School, serving grades 7-12, located at 1049 N Fairfax Avenue; and
- Fairfax Senior High, located at 7850 Melrose Avenue.

It should be noted that a State-mandated open enrollment policy enables students anywhere in LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal’s knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.

The Project would construct one new single-family residence. As shown in **Table 13, Project Estimated Student Generation**, the Project is expected to increase the local student population by a total of three students.

[148] *Los Angeles Unified School District, Resident School Finder, available at: https://explorelausd.schoolmint.net/school-finder/home, accessed September 2022.*

Table 13
Project Estimated Student Generation

Grades	Students per Household[1]	Total Students
TK-6	0.1953	1
7-8	0.0538	1
9-12	0.1071	1
	Total New Students	**3**

All numbers rounded up.
1 Source: Los Angeles Unified School District, 2022 Developer Fee Justification Study, March 2022, page 5.

This incremental increase in local student population would not be expected to significantly impact local schools. Furthermore, to reduce any potential impacts on public schools resulting from population growth, Education Code Section 17620 allows school districts to assess fees on new residential and commercial construction within their respective boundaries. These fees are collected to fund the construction of school facilities necessitated by the impact of residential and commercial development activity. In addition, these fees can also be used to fund the reconstruction of school facilities to accommodate students generated from new development projects. Fees are collected immediately prior to the time of the issuance of a building permit. The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD. Pursuant to Section 65995(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." As such, with payment of school impact fees, the Project would not result in the need for new or altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

d) Parks?

Less Than Significant Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipal recreation and park facilities within the City. LADRP provides stewardship over more than 16,000 acres of parkland, including 446 parks, 312 athletic fields, 423 playgrounds, 341 indoor and outdoor basketball courts, 321 tennis courts, 184 community and recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, and 9 dog parks.[149] In addition, the Department oversees Griffith Park, one of the largest urban

149 City of Los Angeles, Department of Recreation and Parks, Park Proud LA, Strategic Plan 2018-2022, page 9.

parks in North America. Based on 16,000 acres of parkland and a 2023 (Project's baseline year) Citywide population of 4,157,979 (see **Checklist Question XIV(a)**), the City has a parkland ratio of 3.8 acres of parkland per 1,000 residents. The following parks and recreational facilities are located within a two-mile radius of the Project Site:[150]

- Hollywood Bowl (2301 N. Highland Avenue); and
- Highland Camrose Park (2101 N. Highland Avenue).

The Project's population increase of 4 persons would not alter the City's parkland ratio, which would remain 3.8 acres per 1,000 residents. Furthermore, consistent with the LADRP's recommended strategy to help alleviate the burden on existing park and recreational facilities, the Project would provide private open space in the form of a yard for the residence. In addition, in accordance with the Quimby Act, the City assesses open space development fees for new residential development. Per LAMC Section 12.33, the Project would be subject to a fee payment prior to the issuance of a certificate of occupancy for the purpose of acquiring, expanding, and improving park and recreational facilities for new residents. The fee is calculated by LADRP on a per new residential unit basis. Therefore, because the Project provides open space, would contribute to Quimby funds for the City via open space development fees, and would not alter the City's parkland ratio, the Project would not result in the need to construct new or physically alter existing recreational facilities, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available.

Other public facilities available to the Project Site include libraries. The Los Angeles Public Library (LAPL) provides services to the City of Los Angeles through its Central Library and eight regional branch libraries and 72 neighborhood branch libraries as well as through web-based sources.[151] The Project Site would be served by the Will & Ariel Durant Branch Library, which is located at 7140 W. Sunset Boulevard.

The Project would generate new residents and visitors on the Project Site, which could result in an increased demand for library services and resources; however, based on the relatively small population increase that would result from the Project (4 residents – see response to Checklist Question XIV(a)), the increase would not be of a level that would create substantial capacity or

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150 *City of Los Angeles, Department of Recreation and Parks, Facility Map Locator, available at: https://www.laparks.org/maplocator?cat_id=All&geo[radius]=1&geo[latitude]=34.2512322&geo[longitude]=-118.3100301&address=8100%20McGroarty%20St,%20Sunland-Tujunga,%20CA%2091040,%20USA, accessed September 28, 2021.*

151 *Los Angeles Public Library, Library Directory, website: https://www.lapl.org/about-lapl/press/central-facts.*

service level problems that would require the provision of new or expanded library facilities in order to maintain an acceptable level of service. Furthermore, library funding is mandated under the City Charter to be funded from property taxes. With the payment of property tax by the Project, the Project would not require the provision of new or physically altered library facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. A significant impact may occur if a project includes substantial population growth which could generate a demand for parks or recreational facilities that exceed the capacity of existing parks or recreational facilities and causes premature deterioration of the facilities.

As discussed in Checklist Question XV(a)(iv), the Project's population increase of 4 persons would not alter the City's parkland ratio, which would remain 3.8 acres per 1,000 residents. In addition, the project would provide private open space in the form of a yard for the residence, which would reduce the potential increase in the need for recreational facilities to serve the Project residents. Moreover, the Project would be subject to the open space development fees required by LAMC Section 12.33, which are intended for the purpose of acquiring, expanding, and improving park and recreational facilities for new residents. As such, the Project's incremental increase of 4 residents would not be expected to increase the use of existing parks and

recreational facilities such that substantial physical deterioration would occur. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

See above response to Checklist Question XVI(a). The Project would provide private open space in the form of a yard for the proposed residence, which would reduce the need for recreational facilities to serve the Project residents. As such, the Project's incremental increase of 4 residents would not be expected to increase the use of existing parks and recreational facilities such that new or expanded recreational facilities would be required. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle, and pedestrian facilities.

In July 2019, LADOT updated the City's Transportation Assessment Guidelines (TAG) to conform to the requirements of Senate Bill 743. TAG replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under the California Environmental Quality Act from level of service (LOS) to vehicle miles traveled (VMT). Table 2.1-1 in the TAG lists Citywide plans, policies, and programs that could apply to a project, including, but not limited to, Mobility Plan 2035, Community Plans, Specific Plans, and the LAMC. In accordance with the City's TAG, a project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. The Project's consistency with applicable policies of the Hollywood Community Plan and the LAMC is provided in response to Checklist Question XI, Land Use. As detailed there, the Project would be consistent with the applicable land use plans. The Project's potential to conflict with the Mobility Plan 2035 is discussed below.

The Mobility Plan combines "complete street" principles with the following five goals that define the City's mobility priorities:

1. Safety First
2. World Class Infrastructure
3. Access for all Angelenos
4. Collaboration, Communication, and Informed Choices
5. Clean Environments and Healthy Communities

The Project location and site access are consistent with the goals of the Mobility Plan as the Project does not require any dedications or improvements along the streets adjacent to the Project Site perimeter to serve the long-term mobility needs identified in Mobility Plan 2035. In addition, the Project does not propose repurposing existing curb space and does not propose narrowing or shifting existing sidewalk placement or paving, narrowing, shifting, or removing an existing parkway. Further, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveway is not proposed along a street with a bicycle facility. The Project would not conflict with the goals of the Mobility Plan and would not interfere with any other policies of the Mobility Plan. Therefore, the Project would be consistent with the Mobility Plan.

Based on the above as well as the analysis presented in Checklist Question XI, Land Use, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. A significant impact may occur if a project's vehicle miles traveled substantially increase compared to existing conditions.

In July 2019, the Los Angeles Department of Transportation (LADOT) updated the City's Transportation Assessment Guidelines (TAG) to conform to the requirements of SB 743. The TAG replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under the CEQA from level of service (LOS) to vehicle miles traveled (VMT) for studies completed within the City. Per the TAG, a Transportation Assessment is required when a project is likely to add 250 or more net daily trips to the local street system. The City has updated the TAG to ensure compliance with Section 15064.3, subdivision (b)(1) of the CEQA Guidelines, which asks if a development project would result in a substantial increase in VMT. The TAG sets the following criterion for determining significant transportation impacts based on VMT:

> *For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?*

To assist in determining which development projects would conflict with CEQA Guidelines section 15064.3, subdivision (b)(1), the TAG establishes two screening criteria to evaluate whether further analysis of a land use project's impact based on VMT is required. Both of the following criteria must be met in order to require further analysis of a land use project's VMT contribution:

1. *The land use project would generate a net increase of 250 or more daily vehicle trips.*
2. *The project would generate a net increase in daily VMT.*

The Project would develop one new single-family residence on the Project Site. Based on trip generation assumptions included in the City's VMT Calculator, the Project would be expected to generate approximately 10 vehicle trips per day.[152] This would be substantially below the threshold required by the LADOT to perform a VMT analysis, pursuant to the screening thresholds included in the TAG. As such, the Project would not conflict with and would not be inconsistent with CEQA Guidelines Section 15064.3. Therefore, impacts would be less than significant and no mitigation measures would be required.

[152] *Based on a trip generation rate of 9.52 trips per day per single-family residence, rounded up to 10 trips. Source: City of Los Angeles, Department of Transportation and Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, Table 1: Land Use and Trip generation Base Assumptions, page 10.*

Mitigation Measures

None required.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. A significant impact may occur if a project includes new roadway design or introduced a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions.

The Project proposes a residential land use at the Site that conforms with the underlying land use designation and zoning, as well as the surrounding existing single-family residential development, and would utilize the existing roadway network. The Project's driveway would conform to the City's design standards with regard to sight distance and width, as well as to the City's applicable emergency access requirements as set forth by the Department of Transportation (LADOT) and the LAFD. Furthermore, the Project design would be reviewed by the Department of City Planning, LADBS, and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the Project would not introduce incompatible uses such as farm equipment to the Project Site and all Project-generated traffic would be of a typical type and amount for a single-family residence. Therefore, impacts would be less than significant during operation and no mitigation measures would be required.

Mitigation Measures

None required.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if a project design does not provide emergency access meeting the requirements of the Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the project site or adjacent uses.

Construction may require staging of equipment and/or worker vehicles along Marlay Drive. However, the Project applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Work Area Traffic Control Plan would be developed for use during the entire construction period. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of grading and construction activity. The Work Area Traffic Control Plan would minimize the potential for conflicts with or impairment of emergency access during construction.

During operation, all driveways and access points proposed for the Project Site would comply with Fire and Building Codes subject to review and approval of LADBS and LAFD as part of the building permit process. In addition, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-

way and emergency access to the Project Site would continue to be provided from Marlay Drive. As discussed in greater detail in response to Checklist Questions XV(a) and XV(b), drivers of emergency vehicles normally have a variety of options to facilitate emergency response, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. These same options would be available during an emergency response plan or evacuation plan. Moreover, the operation of a single-family residence would not be expected to increase the volume of traffic in the vicinity in a manner that could impact the performance of roadways that could be utilized as evacuations routes during an emergency.

Based on the above, the Project would not result in inadequate emergency access. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant, pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

AB 52 of 2014 was enacted as of July 1, 2015 to expand CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "a Project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a Project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project." Native American tribes to be included in the process are those that have requested notice of Projects proposed within the jurisdiction of the lead agency.

The following analysis of potential cultural resources impacts of the Project is based, in part, on the Tribal Cultural Resources Assessment (TCR Assessment) prepared for the Project by South Environmental in August 2025. The TCR Assessment is included as Appendix G to this IS/MND and its findings, conclusions, and recommendations are incorporated by reference herein.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. As detailed in **Checklist Section V, Cultural Resources**, the Project Site is not listed and is not eligible for listing in the California Register of Historical Resources or in a local register of historical resources. A review of the CHRIS database conducted as part of the TCR Assessment for the Project did not identify any previously recorded

cultural resources at the Project Site.[153] Based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[154] A review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC) was negative for sacred lands or resources important to Native Americans within the vicinity of the Project Site.[155]

The Project Site is located approximately 9 miles northeast of the Pacific Ocean in the City of Los Angeles, surrounded by residential development set within the steep Hollywood Hills overlooking Sunset Boulevard along Marlay Drive. The site is currently undeveloped and consists primarily of disturbed soils with ruderal invasive plant species dominated by Fountain Grass Swards (Pennisetum setaceum Herbaceous Semi-Natural Alliance). The Project Site is adjacent to a steep canyon containing a dense concentration of more mature trees, including pines, located to the west and south, and private residences are located directly to the north, east, and southeast with little to no vegetation. It is likely that the Project Site has been subject to regular brush clearance (i.e., fuel modification) as required by the City of Los Angeles Fire Department as a measure to control the spread of wildfire. The nearest major natural water feature to the Project Site is the Los Angeles River, located approximately 2.8 miles to the north over the hills in the San Fernando Valley. Smaller streams were identified within the Hollywood Hills including to the east near Runyon Canyon Park, and further northwest in the Santa Monica Mountains National Recreation Area.[156] Soils within the project site are dominated by Urban land-Xerorthents, landscaped complex, associated with 0 to 5 percent slopes on hillsides. The parent material is human-transported material consisting of mostly colluvium and/or residuum weathered from sedimentary rock.[157]

Ethnographic research indicates that the Project Site is closest to two smaller settlements located near the Cahuenga Pass and the Los Angeles River and is located near natural resources which would have been important to Native Americans in prehistoric and protohistoric times. However, there is no other evidence available to suggest that the Project Site provided any consistent or seasonal sources of water or other natural resources that would increase the likelihood of the presence of archaeological resources or tribal cultural resources. Further, the surrounding residential area has been extensively developed in recent years and it appears that the Project Site is subject to regular disturbances resulting from fuel modification requirements.[158]

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153 *South Environmental, Tribal Cultural Resources Assessment, 1501 Marlay Drive Los Angeles, California, August 2025.*

154 *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.*

155 *South Environmental, Tribal Cultural Resources Assessment, 1501 Marlay Drive Los Angeles, California, August 2025.*

156 *South Environmental, Tribal Cultural Resources Assessment, 1501 Marlay Drive Los Angeles, California, August 2025.*

157 *South Environmental, Tribal Cultural Resources Assessment, 1501 Marlay Drive Los Angeles, California, August 2025.*

158 *South Environmental, Tribal Cultural Resources Assessment, 1501 Marlay Drive Los Angeles, California, August 2025.*

Pursuant to PRC Section 21084.2, AB 52 notification of the Project was sent to ten (10) Native American tribes requesting information regarding cultural resources of Native American origin within or near the Project Site on October 28, 2022.

Consultation with the Fernandeño Tataviam Band of Mission Indians (Fernandeño Tataviam tribe) revealed that the site is approximately two miles away from a Tribal Cultural Resource. The Fernandeño Tataviam tribe requested mitigation measures be included as part of the initial study, which calls for halting work and contacting the Fernandeño Tataviam tribe for review of any pre-contact and/or post-contact finds. That mitigation measure has been incorporated as MM TCR-1.

In addition, on November 7, 2022, a representative from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) replied via email to the letter and requested consultation. A consultation was set for January 19, 2023. On January 18, 2023, a representative from Kizh Nation cancelled the consultation, due to unforeseen circumstances. In order to continue the AB 52 process, the tribe provided their concerns in confidential written format in lieu of the meeting. On January 19, 2023, the Kizh Nation sent via email confidential evidence of a potential impact to tribal cultural resources with the Project, as well as their requested mitigation measure. On December 12, 2025, the Kizh Nation sent updated mitigation measures for the record. Those mitigation measures have been incorporated as MM TCR-2

Compliance with the mitigation measures would ensure any found resources are treated in accordance with mitigation measures requested by the Fernandeno Tataviam and Kizh Nation tribes and federal, state, and local guidelines, including those set forth in PRC Section 21083.2. As such, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, impacts would be less than significant with mitigation.

Mitigation Measures

MM TCR-1 If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.

a. Should the find be deemed significant, as defined by CEQA (as amended, 2015), the Project applicant shall retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

MM TCR-2a Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-2b Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

a. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in

the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural, and/or historic purposes.

MM TCR-2c Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

a. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

b. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

d. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

e. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

d. Generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

The City of Los Angeles Department of Water and Power (LADWP) currently provides water for domestic water systems and for fire flow to the Project area. Construction water demand is typically supplied through temporary water tanks with water trucked in from off-site sources. Accordingly, construction of the Project would not require the installation of water supply facilities. As detailed below in response to Checklist Question XIX(b), sufficient water supplies would be available to serve operation of the Project and no new off-site lines would be required. However, the Project Site is currently vacant and undeveloped and does not contain any water distribution lines. As such, the Project would require construction of new, on-site water distribution lines to serve the Project Site. Specifically, the Project would include new service laterals connecting the new on-site water mains to the new residence, and connections to the existing water main in Marlay Drive. Additionally, as discussed in response to Checklist Question XV(a), LAMC Section 57.507.3.3 identifies a fire flow requirement of 2,000 gpm from three adjacent hydrants flowing simultaneously, which translates to approximately 667 gpm flowing from each hydrant with a minimum residual pressure of 20 psi. LAFD would determine the number of fire hydrants that are required for the Project during its review of the building design and LAFD requirements; such improvements would be completed as part of Project development either on-site or off-site within the right-of-way under the City's B-Permit process.

The demand and installation of new water supply lines and fire hydrants are evaluated and managed by LADWP and LAFD, respectively, under their own independent environmental analysis. Impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the

locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. A Work Area Traffic Control Plan would be developed for use during the entire construction period to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to existing water lines. As such, the construction of new water facilities would not result in significant environmental effects. Accordingly, impacts to water facilities would be less than significant and no mitigation measures would be required.

Wastewater Facilities

The City's Bureau of Sanitation provides sewer service to the Project area. During construction of the Project, workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Therefore, wastewater generation from Project construction activities is not anticipated to cause any increase in wastewater flows. As detailed below in response to Checklist Question XIX(c), the Project's operational wastewater would be treated by the Hyperion Water Reclamation Plant (HWRP), which has adequate capacity to serve the Project. Accordingly, it is not anticipated that the Project would require the construction of new wastewater treatment facilities. However, because the Project Site is currently vacant and undeveloped, the Project would require construction of new on-site wastewater infrastructure to serve the new residence. Specifically, the Project would include the installation of new service laterals connecting the new on-site wastewater main lines to the new residence, and connections to the existing wastewater main line in Marlay Drive Street.

Although no upgrades to the public main are anticipated, minor off-site work along the Project frontage would be required in order to connect to the public main. All off-site work would be performed in consultation and under the approval of the Bureau of Sanitation. Furthermore, as part of the building permit process, the City would require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures.

Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater collection, and minor off-site work associated with connections to the public main line. Although no upgrades to the public main line are anticipated, minor off-site work along the Project frontage would be required in order to connect to the public main line. All off-site work would be performed in consultation and under the approval of the Bureau of Sanitation and a Work Area Traffic Control Plan would be developed for use during the entire construction period that would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to existing wastewater facilities. Therefore, the construction of new wastewater facilities would not result in significant environmental effects. Accordingly, impacts to wastewater facilities would be less than significant and no mitigation measures would be required.

Stormwater Drainage Facilities

As discussed in Checklist Question X.c(ii), Hydrology and Water Quality, a Project-specific SUSMP would be implemented during the operation of the Project. Accordingly, runoff flow would be reduced as a result of the Project, consistent with the requirements of the NPDES permit and LID Ordinance, which require a reduction of the volume of runoff from the Project Site when compared to existing conditions. Accordingly, the existing stormwater drainage would have sufficient capacity to receive the Project's post-development runoff. As such, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Electric Power Facilities

The LADWP would supply the Project from the existing electrical system. Electricity demand during construction would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities. As detailed in Checklist Question VI, Energy, the Project's operational electricity demand would represent an insignificant percentage of LADWP's available supplies and would not require new or expanded electrical supplies. However, the Project may require underground line extensions on public street.

All electrical facility installation and connection to the existing system would be done in coordination and under the approval of the LADWP and a Work Area Traffic Control Plan for use during the entire construction period would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to the electrical system. Therefore, the construction of new electric power facilities would not result in significant environmental effects. Accordingly, impacts to electric power facilities would be less than significant and no mitigation measures would be required.

Natural Gas Facilities

SoCalGas would supply the Project from the existing natural gas facilities. Construction activities typically do not involve the consumption of natural gas. Accordingly, construction of the Project would not require the installation of natural gas facilities. As detailed in Checklist Question VI, Energy, the Project's operational natural gas demand would represent an insignificant percentage of SoCalGas' available supplies and would not require new or expanded sources of natural gas.

However, the Project would require construction of new, on-site gas distribution lines to serve the new residence.

The Project would connect to existing natural gas facilities in coordination with and under the supervision of SoCalGas. In addition, a Work Area Traffic Control Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to the existing natural gas facilities. Therefore, the construction of new natural gas facilities would not result in significant environmental effects. Accordingly, impacts to natural gas facilities would be less than significant and no mitigation measures would be required.

Telecommunications Facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. In addition, a Work Area Traffic Control Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including during off-site connection to off-site telecommunication facilities. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Accordingly, impacts to telecommunication facilities would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the MWD, which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. In accordance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.303, the Project would be required to implement water saving features to reduce the amount of water used by the Project including high-efficiency toilets, low-flow showerheads and faucets, high-efficiency clothes washers, and high-efficiency dish washers. All fixtures would be required to meet applicable flush volumes and

flow rates. The Project would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions. Accounting for compliance with these requirements and water conservation measures, including Title 20 and 24 of the California Administrative Code, the CalEEMod outputs prepared for the Project (see **Appendix A**) estimated that the Project would have an annual water demand of 42,571 gallons per year (0.13 acre-feet per year [AFY]).

LADWP's UWMP confirmed that despite an increase in population of over one million people, over the last 20 years, the City's water demand has been reduced by 29 percent; with the average water usage below the average usage in the 1970s.[159] The City is also focused on increasing locally produced water supplies, including conservation, water use efficiency, stormwater recycling, and maximizing water reuse from the Hyperion Water Reclamation Plant (Operation NEXT), and will continue to pursue and/or investigate alternative water supply options, such as water transfers, groundwater banking, brackish groundwater recovery, and seawater desalination. Based on these approaches, the UWMP projects future water demand within the City under single-dry years, average, and multiple-dry years hydrological conditions through the 2045 planning horizon year and identifies existing and potential supplies available to continue to meet demand. Projected future water demands and available supply amounts for the City are presented in **Table 14, LADWP Water Supply and Demand Projections**.

Table 14
LADWP Water Supply and Demand Projections

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
Single-Dry Years						
Total Supplies	674,700	693,200	712,700	732,700	746,000	72,000
Total Demands	674,700	693,200	712,700	732,700	746,000	72,000
Average Years						
Total Supplies	642,600	660,200	678,800	697,800	710,500	67,900
Total Demands	642,600	660,200	678,800	697,800	710,500	67,900
Multiple-Dry Years (Year 1)						
Total Supplies	657,900	675,800	694,900	714,400	727,400	69,500
Total Demands	657,900	675,800	694,900	714,400	727,400	69,500
Multiple-Dry Years (Year 2)						
Total Supplies	661,700	679,700	698,900	718,500	731,500	69,800
Total Demands	661,700	679,700	698,900	718,500	731,500	69,800
Multiple-Dry Years (Year 3)						
Total Supplies	674,800	693,200	712,800	732,700	746,000	71,200
Total Demands	674,800	693,200	712,800	732,700	746,000	71,200
Multiple-Dry Years (Year 4)						
Total Supplies	661,600	679,600	698,900	718,400	731,500	69,900
Total Demands	661,600	679,600	698,900	718,400	731,500	69,900

159 *City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, page ES-3.*

Table 14
LADWP Water Supply and Demand Projections

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
Multiple-Dry Years (Year 5)						
Total Supplies	655,700	673,600	692,600	712,000	724,900	69,200
Total Demands	655,700	673,600	692,600	712,000	724,900	69,200

AFY = acre-feet per year
Source: City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, Exhibits ES-R, ES-S, and ES-T, pages ES-20 through ES-24.

As shown in Table 14, LADWP Water Supply and Demand Projections, annual water demand within the City is projected to increase over the planning period by between 67,900 AFY and 72,000 AFY. The Project's estimated 0.13 AFY demand would represent 0.0002 percent of the projected increase in annual water demand of 67,900 AFY from 2025 to 2045. Moreover, as also shown in Table 14, LADWP Water Supply and Demand Projections, LADWP projects sufficient water supplies to meet all demands through the planning period under all hydrological conditions. As detailed in Checklist Question XIV, Population and Housing, the Project's population growth of an estimated four (4) new residents would represent negligible percentage of the projected 613,321 population increase during the planning horizon and would be consistent with the forecasted population growth for the City by 2045. Accordingly, the Project's estimated water demand has been accounted for within LADWP's projections and would not exceed the water demand estimates of the 2020 UWMP. As such, the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple-dry years. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded.

The City's Bureau of Sanitation provides wastewater service to the Project area. Wastewater from the Project Site would be conveyed from the Project Site via the City's existing wastewater infrastructure to the HWRP. The HWRP treats an average daily flow of 275 million gallons per day (mgd) in dry weather. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days, with a

maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd.[160] This equals a typical remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. According to the CalEEMod outputs prepared for the Project (see **Appendix A**), the Project's indoor water demand would be approximately 37,274 gallons per year, or approximately 102 gallons per day. Assuming that 100 percent of the Project's indoor water demand would subsequently be treated as wastewater, the Project's wastewater generation would account for 0.00005 percent of the available daily capacity at the HWRP. As such, the Project would result in a determination by the wastewater treatment provider that it has adequate capacity to serve the Project's projected demand in addition to existing commitments. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

d) Would the project generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

The Los Angeles Bureau of Sanitation and Environment (LASAN) manages solid waste collection in the City, which involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LASAN provides collection services primarily to single-family residences, while multi-family residences, such as apartments, contract with a private company to collect and transport their materials for disposal or recycling. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill.

Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or wastershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste[161] such as construction and demolition (C&D) waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills. The County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.

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160 *City of Los Angeles Department of Public Works, Bureau of Sanitation, Clean Water, Hyperion Water Reclamation Plant, Treatment Process, available at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=f1q2ntjuy_5&_afrLoop=20281605996510108#!, accessed November 2022.*

161 *Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.*

Based on the most recent 2020 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 148.4 million tons as of December 2019. Most commonly, solid waste collected within the City is disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day and, based on its average daily intake of 6,919 tons per day, has capacity for an additional 5,181 tons per day. [162] The 2020 CoIWMP estimates that it has a remaining capacity of 59.16 million tons and a remaining life of 18 years.[163] The Azusa Land Reclamation facility is the only permitted inert waste landfill in the County that has a full solid waste facility permit; the landfill had 58.84 million tons of remaining capacity and an average daily disposal rate of 854 tons per day as of December 2019.[164]

Under State law (AB 939, as amended by AB 341), jurisdictions are currently required to meet a solid waste diversion goal of 75 percent. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching "zero waste." The goal of zero waste, as defined by the RENEW LA Plan, is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a zero waste city by 2030.[165] To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and C&D waste recycling (also required by SB 1374). Using calculation methodology adopted by the State, the City achieved a 76.4 percent diversion rate by 2012.[166]

Construction

The Project would not require demolition and would, therefore, not generate demolition waste. Construction of the new residence would generate a total of approximately seven (7) tons of solid waste.[167] Pursuant to the requirements of the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181519), all haulers and contractors responsible for handling C&D waste must obtain a Private Waste Hauler Permit from LASAN prior to collecting, hauling and transporting C&D waste, which can only be taken to City-certified C&D processing facilities. In accordance with the requirements of AB 939 and SB 1374, which mandate diversion

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162 *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

163 *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

164 *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

165 *City of Los Angeles, Bureau of Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015, available at: https://www.lacitysan.org/san/sandocview?docname=cnt012522, accessed November 2022.*

166 *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013, page 3.*

167 *A construction waste generation rate of 4.44 pounds per square foot for residential construction was used. The Project would develop 3,100 square feet of new residential floor area. 3,100 square feet x 4.44 pounds per square-foot = 13,764 pounds (6.9 tons, rounded to 7 tons). Construction waste generation rate source: USEPA Report Construction and Demolition Materials Amount, Table 2-1, Summary of Residential Construction Job Site C & D Materials Survey, Average Generation Factor in the United States, 2003.*

of construction and demolition waste through salvaging, recycling, and reuse, it is assumed that 75 percent of the Project's construction waste would be diverted from disposal. Accordingly, the Project would result in 1.75 tons of construction waste that would require disposal at an inert waste landfill. Based on Azusa Land Reclamation's 58.84 million tons of remaining capacity, there would be sufficient capacity to serve the construction waste disposal needs of the Project. In addition, the Project would require a total of 2,991 cy of soil export for disposal. Based on Sunshine Canyon's 59.16 million tons of remaining capacity, there would be sufficient capacity to serve the soil export disposal needs of the Project. Based on the available capacity and the required diversion requirements, construction of the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant and no mitigation measures would be required.

Operation

As previously detailed, the City is required by AB 939/AB 341 to divert 75 percent of solid waste generated within the City from landfill disposal. The City's RENEW LA Plan has also set a goal of 90 percent diversion by 2025 and zero waste by 2030. In order to meet diversion requirements and achieve increased diversion goals, the City implements programs that would be implemented at the Project Site such as separate curbside recycling and yard waste/composting bins. Accounting for mandatory recycling and composting that would be provided to Project residents through the City's waste hauling service, CalEEMod outputs prepared for the Project (see **Appendix A**), estimate that the anticipated total solid waste generation for the Project would be 0.8 tons per year (0.003 tons per day).[168] that would require disposal at a Class III landfill. Based on Sunshine Canyon Landfill's permitted daily capacity of 12,100 tons per day, remaining daily capacity of 5,181 tons per day, remaining permitted capacity of 59.16 million tons, and remaining lifetime of 18 years, there would be sufficient capacity to serve the disposal needs of the Project. Based on the available capacity and the required diversion requirements, operation of the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated onsite by the project would be disposed of in accordance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939.

168 *According to the 2020 CoIWMP, average daily intake quantities are based on 312 days per year (6 days a week). Calculated as follows: 0.8 tons per year / 312 days per year = 0.003 tons per day.*

The Project would be consistent with applicable regulation associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include on-site trash and recycling areas for each home. The Project would generate solid waste that is typical of a residential project and would be required to be consistent with all federal, State, and local statutes and regulations regarding proper disposal. Additionally, the amount of solid waste that would be generated by the Project would be further reduced through source reduction and recycling programs (as discussed above). Therefore, Project impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to the slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes?	☐	☐	☒	☐

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency

evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

The Project Site is located within a Very High Fire Hazard Severity Zone and would, accordingly, be required to incorporate the special fire-resistance and fire-protection requirements established in LAMC Section 91.7207 with regard to unenclosed under-floor areas, utilities, attic openings, and roofing, as well as the wildfire protection and vegetation clearance requirements of the California Fire Code Section 4905 and Section 4906, respectively.[169] The Project Site is located on Marlay Drive, which is not designated as a Primary or Secondary Disaster Route.[170] Staging, parking, and access to the site during construction would occur on Marlay Drive.[171]

The Project, comprised of a single-family residential use, would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project would include an access driveway from Marlay Drive, which would provide adequate emergency access to the Site. The Project does not propose any new roads or infrastructure that have the potential to interfere with or obstruct an adopted emergency response plan or impede fire or police access to the Site. Project operation and maintenance would not introduce new activities that could impede or interfere with emergency plans, as operation and maintenance would not involve work along nearby roadways. Furthermore, the Project would not result in such an increase in population on the site that traffic would impede evacuation routes. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Due to the slope, prevailing winds, and other factors, would a project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. A significant impact may occur if a project were to expose people to pollutant concentrations from a wildfire or in the path of an uncontrolled spread of a wildfire.

Topography influences the movement of air and the direction of a fire course. Additionally, wind events magnify the risks of wildfire and would have the potential to expose inhabitants to elevated pollutant concentrations. According to ZIMAS, the Project Site is located within a Hillside Area, a

169 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

170 *Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles - Valley Area, website: https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Valley%20Area.pdf, accessed November 2022.*

171 *Mountain Lion Habitat Assessment for 1501 Marlay Drive Project in Los Angeles, California, prepared by South Environmental, dated September 29, 2022.*

Very High Fire Severity Zone, and a Special Grading Area.[172] However, as discussed in response to Checklist Question IX(g), areas designated within a Very High Fire Hazard Severity Zone are required to be designed and constructed in accordance with the design requirements of the Los Angeles Fire Code, including, but not limited to, the following:

- Ignition-resistant roofing and other building materials
- Fire-Retardant-Treated Wood or noncombustible materials
- Roof coverings, valleys, and gutters
- Attic ventilation
- Eave or cornice vents
- Sprinkler systems
- Landscaping with fire-retardant plants
- Vegetation clearance

Additionally, prior to issuance of a Certificate of Occupancy, the Project Applicant would be required to coordinate with LAFD to ensure that the Project incorporates all appropriate fire-prevention measures. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Additionally, owners of the proposed residence would be required to maintain defensible space per regulation found in the California Public Resources Code 4291 as applicable.

Furthermore, the Project Site is surrounded by residential neighborhoods, and development of the Project Site would decrease the potential for the Project Site to introduce wildland fires to these neighborhoods through site brush clearance and development. Prior to the issuance of a grading permit, the Applicant would be required to submit fuel modification plans to the City. The Project would be subject to special building standards for residential construction in a Very High Fire Severity Zone which would reduce fire hazards to residents. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

[172] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed November 2022.*

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. A significant impact may occur if a project would require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.

The Project would involve the construction of a single-family residential use in an urbanized area in the City. No roads, fuel breaks, or emergency water sources would be installed or maintained. Installation of any required power lines or other utilities would be done in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City building codes and utility provider policies and would not exacerbate fire risk. Furthermore, the Project Site is located immediately adjacent to suburban development with existing single-family homes that are already served by the LAFD and development of the Project Site would decrease the potential for the Project Site to introduce wildland fires to these neighborhoods through site brush clearance and development. Accordingly, implementation of the Project's infrastructure would not exacerbate fire risk or result in ongoing impacts to the environment. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes?

Less Than Significant Impact. A significant impact may occur if a project were to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.

As discussed in Checklist Question VII.a(iv), ZIMAS and the California Department of Conservation show that the Project Site is located within a mapped landslide hazard zone.[173,174] According to the Geology/Soils Report,[175] the earth materials beneath the Site consist of up to 10 feet of uncertified fill underlain by granite bedrock and no geologic structure, such as joints and fractures, were mapped or reported as part of subsurface exploration of the Site. The Project would be required through regulatory compliance to incorporate the recommendation of the Project's geotechnical engineer contained within the geotechnical report, inclusive of laboratory

173 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: November 2022.*

174 *California Department of Conservation, California Geological Survey, California Earthquake Hazards Zone Application, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed: November 2022.*

175 *Schick Geotechnical, Inc. Geology/Soils Report (SG 6684-W), April 4, 2014.*

testing and addendums related to structural redesigns of the Project's retaining wall, and with all of the conditions issued by LADBS per their Approval Letters, which would account for kinematic and slope stability analyses for the Site.

In the LADBS Approval Letters, issued for the Project's geotechnical report, inclusive of laboratory testing and addendums related to structural redesigns of the Project's retaining wall, it was determined that the Project design "include an acceptable seismic slope stability analysis and the requirements of the 2020 City of Los Angeles Building Code have been satisfied" and that the Project's geotechnical reports are acceptable provided that the conditions established for the Project and Site in their Approval Letters are complied with during Site development. The recommendations of the Geotechnical Reports are included in the Geology and Soils Approval Letter provided by LADBS, which have become conditions of the Project.

Conformance with the LADBS conditions, which incorporate the recommendations of the Geotechnical Reports, and with the City's current Building Code requirements would minimize the potential to expose people or structures to downslope or downstream landslides.

As discussed in Checklist Question X.c(ii), a Project-specific SUSMP would be implemented during the operation of the Project. Accordingly, runoff flow would be reduced as a result of the Project, consistent with the requirements of the NPDES permit and LID Ordinance, which require a reduction of the volume of runoff from the Project Site when compared to existing conditions. As such the potential increase in runoff volume into the existing storm drain system would be within the acceptable rates established by the City. This would ensure that runoff would not cause flooding on or off of the Project Site. Furthermore, according to the FEMA Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.[176] Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-	☐	☒	☐	☐

176 *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1605F, effective September 2008.*

sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues.

The Project would alter the existing undeveloped conditions of the approximately 0.11-acre site through grading activities to accommodate the proposed single family residential home. Construction activities would include excavation, grading, foundations, building construction, and finishing. Grading and retaining wall construction would occur as required by the Geotechnical Reports and LADBS.

As discussed in Checklist Question IV., Biological Resources, the Project could adversely affect raptors and nesting birds if construction occurs while they are present on or adjacent to the Site through direct mortality or abandonment of nests. The loss of a nest due to construction activities would be a violation of CFGC Section 3503, 3503.5, 3513 and 3800, and the MBTA. Implementation of **RCM BIO-1** would be required to assure such potential impacts to nesting birds are avoided or minimized.[177]

As discussed in Checklist Question V., Cultural Resources, the proximity of the Project to the historically designated Stahl House necessitates strategies to prevent any adverse physical impacts. Mitigation Measures **MM CUL-1** and **MM CUL-2** create a comprehensive Historical

[177] *South Environmental Consulting, Biological Resources Report for 1501 Marlay Drive, August 2025.*

Resource Monitoring and Protection Plan, with oversight from a qualified structural engineer and a qualified architectural historian to incorporate the recommendations of the Potential Physical Impacts Report to reduce potential physical impacts to the Stahl House to a less than significant level.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

Air Quality

With regard to air quality, the Project area is out of State attainment for both ozone and particulate matter (PM-10 and PM-2.5). Because the South Coast Air Basin is currently in nonattainment for PM-10 and PM-2.5, other new projects in the local vicinity could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the Project contribution, the SCAQMD considers any construction-related and/or operational emissions from individual projects that exceed the project-specific thresholds of significance identified above to be considered cumulatively considerable. As discussed in Checklist Question III, Air Quality, the maximum mass daily regional construction-related and operational emissions associated with the Project would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and would not be cumulatively considerable. With respect to long-term emissions, this Project would create a less than significant cumulative impact and no mitigation measures are required.

Noise

While the timing or sequencing of potential related projects in the vicinity is unknown, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period noise and groundborne vibration for the Project and each related project (that has not yet been built) would be localized. As there was no traffic study required for this Project, a list of cumulative projects was not available. However, any cumulative project in the area would be subject to Section 112.05 of the LAMC; which prohibits noise levels from construction that exceed 75 dBA at a distance of 50 feet, between the hours of 7:00 AM and 10:00 PM; and the L.A. CEQA Thresholds Guide, which requires mitigation if a project has any of the following:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;

- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or

- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or anytime on Sunday.

Therefore, with any potential related project also complying with City requirements regarding construction noise impacts, cumulative construction noise levels will not exceed the City's applicable standard of 75 dBA at the nearby sensitive receptors and noise levels would not exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use. The Project would not contribute to a cumulative construction-related noise impact and impacts would be less than significant.

Operational noise associated with the Project will be consistent with the other land uses in the Project area. As is true for the Project, compliance with the LAMC-required provisions that limit stationary source noise from items such as rooftop mechanical equipment would ensure that noise levels would be less than significant at the property line for each related project. In addition, on-site noise generated by any related project would be sufficiently low and sufficiently distant from the Project Site that it would not result in an additive increase to Project-related noise levels.

Although any potential related project could potentially impact an adjacent sensitive use, that potential impact would be localized to that specific area and would not contribute to cumulative noise conditions at or adjacent to the Project Site. Cumulative stationary noise source impacts would be less than cumulatively significant.

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and related projects within the study area. The Project would be expected to generate approximately 10 vehicle trips per day[178] which is less than the VMT Screening Criteria threshold of 250 net daily vehicle trips; thus, a transportation assessment was not required, and the Project would not result in any significant VMT transportation impacts. Therefore, as no VMT analysis was performed for the Project, the Project is not anticipated to make a cumulatively considerable contribution to a cumulative noise impact associated with traffic noise sources.

Demand for water and sewer services, parkland, recreation resources and public services, as well as the added vehicle traffic, would burden public facilities off-site that already serve other land uses and are intended to serve future growth, including the Project. Thus, one project's incremental demand impact may be relatively minor but could be sufficient to exceed the service capacity of a community scale facility or result in significant traffic congestion, which would be considered a cumulatively significant impact. In the assessments of its impacts involving water and sewer services, schools, parkland, recreation and public services, the Project's impacts were determined to be less than significant on a project level. No capacity deficiencies or other potentially significant impacts to the affected systems have been identified. The City and region's

178 *Based on a trip generation rate of 9.52 trips per day per single-family residence, rounded up to 10 trips. Source: City of Los Angeles, Department of Transportation and Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, Table 1: Land Use and Trip generation Base Assumptions, page 10.*

existing long-range planning and project-level review programs adequately address potential cumulative impacts due to ongoing growth.

In the analysis of traffic impacts for this Initial Study (see Checklist Question XVII, Transportation), the Project is forecast to generate approximately 10 daily vehicle trips. Per the TAG, a Transportation Assessment is required when a project is likely to add 250 or more net daily trips to the local street system. Thus, the Project is not expected to result in significant impacts to the surrounding transportation system. Therefore, neither a Transportation Assessment nor other further analysis of transportation impacts is required for the Project. Therefore, the Project would result in a less than significant VMT impact based on the recommended screening thresholds.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections.

In general, impacts to human beings are associated with air quality, geology and soils, hazardous materials, hydrology and water quality and noise impacts. As discussed in Checklist Question III, Air Quality, the South Coast Air Basin is currently designated as a non-attainment area for ozone, PM10 and PM2.5. Implementation of the Project would not contribute significant amounts of air pollutant emissions on either a short-term or long term basis. Adherence to SCSQAMD dust control measures will further reduce short-term construction air quality impacts and no project-specific mitigation is required.

As discussed in Checklist Questions IX, Hazards and Hazardous Materials, X, Hydrology and Water Quality, and XVII, Transportation, of this Initial Study, the Project would not expose persons to hazardous materials, or wastes, flooding or transportation hazards. Checklist Question VII, Geology and Soils explains that the area is subject to strong seismic earth shaking due to the potential for earthquakes in Southern California. The soils and geologic conditions on the site would be managed through required compliance with the California Building Code. Construction plans would be subject to review by the City for compliance with the most current edition of the CBC at the time of construction. Thus, the Project would not result in adverse effects on human beings from geotechnical considerations.

Project construction is not anticipated to exceed the City noise standards at the surrounding single-family residential uses. Further, with compliance with the City's Municipal Code, it is assumed that construction would not occur during the noise-sensitive nighttime hours. Impacts related to construction noise would be reduced with adherence to the above Municipal Ordinances and impacts would be less than significant.

Therefore, the Project would not create environmental effects that would cause substantial adverse effects on humans.

5 MITIGATION MONITORING PROGRAM

5.1 INTRODUCTION

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the MND takes into consideration the project design features (PDF), Environmental Protection Measures and Noise and Vibration Standards (EPMs/NVs), and applies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs, EPMs/NVs, and MMs identified for the Project.

5.2 ORGANIZATION

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF, EPMs/NV, or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF, EPMs/NV, or MM shall be monitored.
- Monitoring Frequency: the frequency at which the PDF, EPMs/NV, or MM shall be monitored.

- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF, EPM/NV, or required MM has been implemented.

5.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF, EPMs/NV, and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF, EPMs/NV, and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF, EPMs/NV, and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs, EPMs/NVs, and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs, EPMs/NVs, and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs, EPMs/NVs, or PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

5.4 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs, EPMs/NVs, and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs, EPMs/NVs, and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF, EPMs/NV, or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an

addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs, EPMs/NVs, or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF, EPMs/NV, or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF, EPMs/NV, or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF, EPMs/NV, or MM shall not in and of itself require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF, EPMs/NV, or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5.5 MITIGATION MONITORING PROGRAM

Cultural Resources

Mitigation Measures

MM CUL-1 Retention of Qualified Structural Engineer and Architectural Historian

Prior to the start of project construction, the Applicant shall retain 1) a qualified structural engineer with demonstrated professional experience working with historic buildings and implementing vibration and slope monitoring programs; and 2) a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for architectural history and/or historic architecture (per Title 36 Code of Federal Regulations Part 61) and has demonstrated professional experience implementing historical resource monitoring and protection plans to oversee implementation of the Historical Resource Monitoring and Protection Plan for the Stahl House (Attachment C to the HRA, which is Appendix C.1 to this Initial Study). The qualifications of the selected individuals shall be reviewed and approved by City of Los Angeles Office of Historic Resources planning staff prior to the start of project construction.

MM CUL-2 Implementation of Historical Resource Monitoring and Protection Plan

A detailed Historical Resource Monitoring and Protection Plan (Attachment C to the HRA, which is Appendix C.1 to this Initial Study) was prepared in consideration of potential impacts to the adjacent Stahl House resulting from vibration and slope instability. The Applicant shall ensure that all of the required elements of the Plan are adhered to throughout the various stages of pre-construction, construction, and post-construction, and that all training, monitoring, and reporting requirements are completed in accordance with the schedule outlined in the Plan. The project's structural engineer, architectural historian, and on-site construction manager shall be empowered to halt all construction activity that falls out of compliance with the Plan or poses a physical threat to the Stahl House. No construction activity may resume until the threat is analyzed, preventative measures are put in place, and approval is provided by both the project's structural engineer and architectural historian.

- **Enforcement Agency:** Department of City Planning (DCP), Los Angeles Department of Building and Safety (LADBS)
- **Monitoring Agency**: DCP, LADBS
- **Monitoring Phase**: Pre-Construction, Construction
- **Monitoring Actions**: Prior to grading permits: ensure that requirements are shown on plans and necessary assurances have been obtained; During construction: field verify that only core or auger drilling is utilized, vibration and slope stability is being monitored.

Noise

Environmental Protection Measures and Noise and Vibration Standards (EPMs/NVs)

NV1-1 Power construction equipment (including combustion engines), fixed or mobile, will be equipped with noise shielding and muffling devices consistent with manufacturers' standards or best available control technology. All equipment will be properly maintained, and the applicant or owner will require any construction contractor to keep documentation on-site during earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

NV1-2 Driven (impact) pile systems shall not be used, except in locations where the underlying geology renders drilled piles, sonic, or vibratory pile drivers infeasible, as determined by a soils or geotechnical engineer and documented in a soils report.

NV1-3 All outdoor mechanical equipment (e.g., generators, compressors, concrete/industrial saws) shall be enclosed or visually screened. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line of sight between the equipment and any off-site noise-sensitive uses.

NV1-4 Construction staging areas shall be located as far from Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving what constitutes 'as far as possible' shall be upon the Applicant or Owner, in consideration of the above factors.

- **Enforcement Agency:** DCP, LADBS
- **Monitoring Agency**: DCP, LADBS
- **Monitoring Phase**: Pre-Construction, Construction
- **Monitoring Actions**: Prior to grading permits: ensure that requirements are shown on plans and necessary assurances have been obtained; During construction: field verify that power construction equipment includes noise shielding and silencing devices, location of construction staging is as described.

Tribal Cultural Resources

Mitigation Measures

MM TCR-1 If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.

a. Should the find be deemed significant, as defined by CEQA (as amended, 2015), the Project applicant shall retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

- **Enforcement Agency:** DCP, LADBS
- **Monitoring Agency:** DCP, LADBS
- **Monitoring Phase:** Pre-Construction, Construction
- **Monitoring Actions:** Applicant shall contact Fernandeño Tataviam Band of Mission Indians (FTBMI) about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input with regards to significance and treatment.

MM TCR-2a Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

- **Enforcement Agency:** DCP, LADBS
- **Monitoring Agency:** DCP, LADBS
- **Monitoring Phase:** Pre-Construction, Construction
- **Monitoring Actions:** Applicant shall contact the Gabrieleño Band of Mission Indians – Kizh Nation prior to ground-disturbing activities for on-site monitoring.

MM TCR-2b Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

a. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

- **Enforcement Agency:** DCP, LADBS
- **Monitoring Agency:** DCP, LADBS
- **Monitoring Phase:** Pre-Construction, Construction
- **Monitoring Actions:** Applicant shall contact the Gabrieleño Band of Mission Indians – Kizh Nation prior to ground-disturbing activities for on-site monitoring.

MM TCR-2c Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

a. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

b. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

d. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

e. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

- **Enforcement Agency:** DCP, LADBS
- **Monitoring Agency:** DCP, LADBS
- **Monitoring Phase:** Pre-Construction, Construction
- **Monitoring Actions:** Applicant shall contact the Gabrieleño Band of Mission Indians – Kizh Nation prior to ground-disturbing activities for on-site monitoring.