



HOUSING ELEMENT STREAMLINING CHECKLIST FORM

Project Within the Scope of The Program EIR

OVERVIEW

On November 24, 2021, the City Council certified the Citywide Housing Element 2021-2029 and Safety Element Updates Final Environmental Impact Report (EIR), SCH No. 2021010130, EIR No. ENV-2020-6762-EIR (Program EIR), to adopt the 2021-2029 Citywide Housing Element and the Updates to the Safety Element and the Plan for a Healthy LA (Health Element). Pursuant to CEQA Guidelines Sections 15168(c)(4) and 15168(d), the following Proposed Housing Project has been found to be within the scope of the program analyzed in the Program EIR and its environmental effects are within the scope of environmental impacts assessed in the Program EIR.

For additional information regarding this form, see the Housing Element Streamlining Checklist Form Instructions ([CP-4091](#)) at the [Department of City Planning Forms Page](#).

PROPOSED HOUSING PROJECT

Description of Proposed Project:

The 425 North Mount Holyoke Avenue Residential Project (Project) would construct a three-story 12,872 square-foot single-family residential (SFR) unit, including an attached 1,336 square-foot Accessory Dwelling Unit (ADU), pool and deck, outdoor terraces, and a garage on a 0.96-acre site. Construction activities would require the export of approximately 1,950 cubic yards of soil and are anticipated to take up to approximately 30 months.

- ☒ Please check this box if you have provided an attachment with additional project description information to this form.

DETERMINATIONS

Based upon the attached, “Project Within the Scope of the Housing Element Program EIR Checklist and Analysis,” the whole of the administrative record on the Proposed Housing Project, and a review and consideration of the Program EIR, the decisionmaker finds all the following statements to be true:

1. This Proposed Housing Project is within the scope of the previously approved program for which the Program EIR was certified.
2. This Proposed Housing Project will have no significant environmental effects not examined in the Program EIR.
3. The Program EIR adequately described the Proposed Housing Project for the purposes of California Environmental Quality Act (CEQA).
4. Pursuant to CEQA Guidelines Section 15162, no substantial changes to the project analyzed in the Program EIR are proposed as part of this Proposed Housing Project. Further, no substantial changes have occurred with respect to the circumstances under which the Program EIR was certified, and no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time that the Program EIR was certified as complete, has become available.
5. All applicable mitigation measures, identified in the Program EIR Mitigation Monitoring Program (MMP), have been incorporated into the Proposed Housing Project or will be made into enforceable obligations on the Proposed Housing Project. A mitigation and monitoring program has been prepared for adoption.

NOTES

The Project is within the scope of the certified Citywide Housing Element 2021-2029 Program Environmental Impact Report (EIR) (Program EIR).

The Program EIR evaluated potential wildfire impacts, however due to the Project Site's proximity to the January 2025 Palisades Fire, the City is requiring additional wildfire analysis be completed for the Project. The additional wildfire analysis will be analyzed in a Focused EIR that will be prepared for the Project.

Reviewed and Approved by Planning Staff Signature: Kathleen King

Print Planner Name: Kathleen King

Phone Number: 213-847-3624

Date: 09/02/26

Digitally signed by Kathleen King
Date: 2026.09.01 15:26:51 -07'00'



ATTACHMENT

PROJECT WITHIN THE SCOPE OF THE HOUSING ELEMENT PROGRAM EIR - CHECKLIST AND ANALYSIS

The following checklist and analysis shall be used to determine if the Proposed Housing Project, described below, is within the scope of the Citywide Housing Element 2021-2029 and Safety Element Updates Final EIR, SCH No. 2021010130, EIR No. ENV-2020-6762 (Program EIR), certified by the City Council.

A. PROPOSED HOUSING PROJECT

A.1 Proposed Housing Project Title:

425 North Mount Holyoke Avenue Residential Project (Assessor Parcel Number (APN) 4412015011)

A.2 Proposed Housing Project Description:

The 425 North Mount Holyoke Avenue Residential Project (Project) would construct a three-story 12,872 square-foot SFR unit, including an attached 1,336 square-foot ADU, pool and deck, outdoor terraces, and a garage on a 0.96-acre site. Construction activities would require the export of approximately 1,950 cubic yards of soil and are anticipated to take up to approximately 30 months.

A.3 Project Location Description:

The Project Site is approximately 500 feet east of Temescal Canyon Road, 600 feet west of Via De La Paz, and approximately 0.23 miles northeast of the Pacific Coast Highway (PCH). Regional access to the Project Site is provided by Temescal Canyon Road, Via De La Paz, and PCH. In the vicinity of the Project Site, PCH runs southeast to northwest and is located southwest of the Project site.

A.4 Surrounding Area and Uses:

The Project is located within an urbanized area of the City, where SFR units are the predominant land use. The Pacific Ocean is located approximately 1,500 feet to the southwest; the nearest commercial uses are located more than one half-mile north of the Project Site along Via De La Paz. The site is adjacent to a single-family residence to the north, a lot where a SFR unit was destroyed in the Palisades Fire to the south, and lots where SFR units were destroyed in the Palisades Fire to the west and east. A number of the surrounding vacant parcels were previously developed with SFR units that were destroyed in the 2025 Palisades Fire, while vacant, the site also burned during the 2025 Palisades Fire.

A.5 Project Contact/Owner Information:

425 Mount Holyoke Ave. LLC, 16901 Collins Ave, Apt. 805, Sunny Isles Beach, FL 33160

A.6 Document Prepared by:

Dudek, Attn: Cori Resha cresha@dudek.com 916.438.5305
225 South Lake Avenue, Suite M210, Pasadena, CA 91101

☒ Check here if additional pages for Section A are attached.

B. PROGRAM EIR BACKGROUND

B.1 CEQA Guidelines Section 15168

The California Environmental Quality Act (CEQA) provides for limited environmental review of subsequent projects under a Program EIR. (CEQA Guidelines Section 15168.) Later activities under a continuing program analyzed in the Program EIR must be examined to determine whether any additional environmental analysis must be conducted. (Guidelines Section 15168(c)(1).) If a lead agency finds that pursuant to Guidelines Section 15162, no subsequent EIR would be required, the lead agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required. (Guidelines Section 15168(c)(2).) Whether a later activity is within the scope of a Program EIR is a factual question that the lead agency determines based upon substantial evidence in the record. (Guidelines Section 15168(c)(2).) The lead agency shall incorporate feasible mitigation measures from the Program EIR Mitigation and Monitoring Program (MMP) into later activities in the program. (Guidelines Section 15168(c)(3).) Where the later activities involve site specific operations, the lead agency should use a written checklist to determine whether the environmental effects of the site-specific operations are within the scope of the Program EIR. (Guidelines Section 15168(c)(4).)

B.2 Program EIR

In certifying the Program EIR and approving the project, the City Council adopted the following findings related to the scope of the project analyzed in the Program EIR and the types of impacts analyzed:

The EIR analyzed the build out of the Regional Housing Needs Assessment (RHNA), that is the build out of 420,327 housing units in eight years (456,643 RHNA minus 36,316 housing units that have received approvals but have not yet been built and/or received the certificate of occupancy [pipeline projects]). The EIR analyzed the program-level impacts from the full build out of the RHNA, as well as the project-level impacts that occur from the development of the types of housing projects that will be developed from build out of the RHNA. The following types of housing projects were analyzed and within the scope of this EIR:

- *Multi-family residential, ranging from small apartment buildings with two to 10 units, medium apartment buildings with between 11-49 units, large apartment buildings with between 50-200 units, or larger apartment buildings and high-rise structures with more than 200 units.*
- *Single-family residential, ranging in size and scale from smaller single-family homes to larger single-family homes, small-lot subdivisions and new single subdivisions.*
- *Accessory dwelling units (ADUs), including attached ADUs, detached ADUs, Junior ADUs, ADUs converted from existing floor area, multiple ADUs on lots with existing multi-family dwellings, and Movable Tiny Homes.*
- *The mixed-use development ranges in size and scale from neighborhood commercial mixed-use with smaller nonresidential uses, to high-rise mixed-use with larger nonresidential uses.*

- *Conversion and/or rehabilitation of existing nonresidential, residential, or mixed-use structures to be used for housing.*

Housing types for different income levels were analyzed, including single-resident occupancy and affordable housing that may be for families, seniors, residents with special needs or permanent supportive housing. The EIR also analyzed the impacts from various locations, geographies, and environments where build out of the RHNA could occur, including the following:

- *Sites currently zoned for residential uses, including multi-family and single-family uses;*
- *Sites currently zoned for commercial uses, which permit residential uses;*
- *Sites currently zoned for hybrid industrial uses, which permit joint live-work residential uses;*
- *Non-vacant sites, and sites with existing housing;*
- *Sites located near public transit;*
- *Sites located in a Historic Preservation Overlay Zone (HPOZ)*
- *Sites located in areas with special environmental considerations, such as areas located by Open Space, Hillside Areas, Very High Fire Hazard Severity Zones (VHFHSZ) or Coastal Zones.*

To analyze project-level impacts on the environment from the variety of housing types and locations that could potentially be built to accommodate the RHNA citywide, the City established a team of experienced project planners who have experience in reviewing environmental documents and analyzing or consulting on environmental impacts for housing projects, as well as other development types, across the entire City geography, including project planners who work in the Major Projects Section, who are responsible for reviewing and preparing all EIRs citywide for the Planning Department; planners who work in the Citywide Environmental Policy Unit who are responsible for advising on all CEQA impact issues, training and advising planners on preparing CEQA clearances; as well as project planners who review and prepare exemptions, negative declarations, mitigated negative declarations, and sustainable communities environmental assessments (SCEAs) within specific geographies in the City. After assembling this consulting team, the City surveyed the thousands of environmental assessments that have been prepared in the last five years for housing development of the type that will build out the RHNA and selected 54 case studies to discuss in the EIR which identify both the typical- and worst-case environmental impacts from housing development. In the survey of environmental assessments, it was determined that the City reviews hundreds of discretionary housing projects every year for CEQA compliance, that the largest majority of housing projects do not require mitigation, as many housing development projects are found to be exempt from CEQA (specifically, hundreds of categorical exemptions are used for small to medium scale housing projects, including Class 32 for infill projects up to 75 units or less); and less than 10 percent of discretionary housing projects require an EIR due to significant and unavoidable impacts. Based on this, the case studies are more heavily weighted toward larger-scale projects or those in sensitive environments that are more likely to have significant impacts. Smaller projects in more urban infill areas typically do not require an EIR, a mitigated negative declaration, or SCEA, unless there are specific site conditions, such as historical resources, site contamination, or archaeological resources, that

raise potential environmental impact concerns. The case studies, which include EIRs, mitigated negative declarations, and SCEAs, were selected based on the type of project (e.g., multi-family residential, single-family residential, ADUs, mixed-use development, and conversion and/or rehabilitation), scale of project (single-family to large tower/mixed use), locations with the broadest range of geographies and environmental conditions, and levels of development and density (hillsides, urban, regional centers, coastal, and suburban areas), as well as projects that include income-restricted projects. The intent was to be conservative and identify all of the reasonably foreseeable ways housing can result in environmental impacts in the City, as well as identify the best mitigation measures developed to address those impacts. The City finds the case studies reviewed in the EIR and their identified level of impacts (i.e., no impacts, less than significant impacts, less than significant impacts with mitigation, and significant and unavoidable impacts) are representative of the typical- and worst-case environmental impacts of housing development to be built to accommodate the RHNA. Also, the City finds that it is not reasonably foreseeable that housing development that will build out the RHNA will have significant impacts in those impact categories that were scoped out in the Initial Study (Appendix A to the FEIR). Additionally, the City finds the mitigation measures, developed in the EIR and included in the MMP, to be used by projects within the scope of the EIR, are comprehensive and based on the screening criteria included in those mitigation measures, further studies, and performance standards will, in a majority of circumstances, reduce environmental impacts from housing development to less than significant. However, based on the findings below and the EIR analysis, even with the application of the mitigation measures in the MMP, significant impacts identified in the Program EIR Findings can still occur from housing development of all types throughout the City. The City Council finds the EIR has analyzed and identified the significant impacts that are reasonably foreseeable from housing development in the City for the types of housing projects (described above) that will accommodate the RHNA. (Appendix A: Citywide Housing Element 2021-2029 and Safety Element Updates Final EIR, CEQA Findings of Facts and Statement of Overriding Considerations.)

Additional information regarding the analysis of the impacts from housing projects or the Housing Element Program and build-out of the RHNA is provided in [Environmental Analysis, Section 4.0, of the Draft EIR](#).

B.3 Environmental Impacts Analyzed in the Program EIR

The environmental impacts analyzed and the impact conclusions identified for Projects within the Scope of the Program EIR are shown in [Appendix A, CEQA Findings of Facts and Statement of Overriding Consideration for the 2021-2029 Citywide Housing Element and Safety Element Updates](#), and in the Program EIR, which may be found at <https://planning.lacity.org/development-services/eir>.

B.4 Program EIR Mitigation Measures

The City Council adopted the [MMP for the 2021-2029 Housing Element](#), provided in Appendix B. The MMP provides that, subject to City authority, the applicable mitigation measures in the MMP shall be imposed as conditions of approval for a project analyzed as a subsequent approval pursuant to CEQA Guidelines Section 15168.

C. FINDING THAT THE PROPOSED HOUSING PROJECT IS A PROJECT WITHIN THE SCOPE OF THE PROGRAM FOR WHICH THE PROGRAM EIR WAS CERTIFIED

Check all of the boxes in Table C-1 that describe the Proposed Housing Project:

Table C-1

☐ Multi-family residential development – Range from small apartment buildings with two to 10 units, medium apartment buildings with between 11-49 units, large apartment buildings with between 50-200 units, or larger apartment buildings and high-rise structures with more than 200 units
☒ Single-family residential development – Range in size and scale from smaller single-family homes to larger single-family homes, small lot subdivisions, and new single-family subdivisions
☒ Accessory dwelling unit (ADU) - Include attached ADUs, detached ADUs, Junior ADUs, ADUs converted from existing floor area, multiple ADUs on lots with existing multi-family dwellings, and Movable Tiny Houses
☐ Mixed-use development - Range in size and scale from neighborhood commercial mixed use with smaller nonresidential uses, to high-rise mixed-use with larger nonresidential uses
☐ Conversion and/or rehabilitation – Existing nonresidential, residential and mixed-use structures to be converted/rehabilitated for housing
☐ Housing type for different income levels , including single-resident occupancy and affordable housing that may be for families, seniors, residents with special needs or permanent supportive housing

CONCLUSION

Check one of the following:

☒ **AT LEAST ONE BOX IN TABLE C-1 IS CHECKED**

The Proposed Housing Project is within the scope of the program that was analyzed in the Program EIR. Go to Section D and E to determine if the site-specific environmental effects of the Proposed Housing Development are within the scope of the Program EIR.

☐ **NONE OF THE BOXES IN TABLE C-1 ARE CHECKED**

The Proposed Housing Project is not within the scope of the program that was analyzed in the Program EIR. A separate environmental analysis is required.

D. MITIGATION MEASURES APPLICABLE TO THE PROPOSED HOUSING PROJECT

The following mitigation measures (MMs) from the [MMP \(Appendix B\)](#) are relevant and applicable to the Proposed Housing Project based on the mitigation measure thresholds of applicability and based on a review of the Proposed Housing Project:

Check all MMs from the MMP that apply to the Project and provide a brief explanation of why any mitigation measures are not triggered by the applicability standard in the mitigation measure:

Mitigation Measure		Applies to Proposed Housing Project
Air Quality		
4.2-2(a)	Construction Emissions Reduction	☐ Yes ☒ No
4.2-2(b)	Operations Emissions Reduction	☐ Yes ☒ No
4.2-3	Construction TAC Reduction Measures	☒ Yes ☐ No
Brief explanation: Mitigation Measure (MM) 4.2-2(a) applies to projects that demolish a structure that is 13,500 square feet or greater, require a minimum of 5,000 cubic yards (cy) of cut/fill, will result in 5 acres or more of grading, and/or use more than 10 pieces of heavy duty construction equipment and 150 truck trips on any day during the Project's demolition, site clearing, or grading periods. Mitigation Measure 4.2-2(b) is required for projects with 462 or more single-family residences or 612 multi-family residences, or any equivalent of any combination thereof. As the Project would not meet any of the thresholds described above and would construct one SFR unit with an attached ADU, these measures do not apply to the Project.		

Mitigation Measure		Applies to Proposed Housing Project
Biological Resources		
4.3-1(a)	Biological Resources Reconnaissance Survey and Reporting	☒ Yes ☐ No
4.3-1(b)	Sensitive Species/Habitat Avoidance: Pre-Construction Bird Nest Surveys, Avoidance, and Notification	☒ Yes ☐ No
4.3-1(c)	Focused Surveys for Rare Plants	☐ Yes ☒ No
4.3-1(d)	Adaptive Management Plan	☐ Yes ☒ No
4.3-2(a)	Habitat Mitigation and Monitoring Plan	☐ Yes ☒ No
4.3-2(b)	Protected Tree and Tree Canopy Survey	☐ Yes ☒ No
Brief explanation: MM 4.3-1(c), and (d), MM 4.3-2(a), and MM 4.3-2 (b) are applicable if the Project's Project's Biological Resources Report (BRR), prepared pursuant to MM 4.3-1(a), determined that a focused rare plant survey, adaptive management plan, habitat mitigation and monitoring plan, and/or protected tree or tree canopy survey is needed. According to the Project's BRR, there are not any sensitive species or habitat, rare plants, the need for an adaptive management plan, the site is not in an area containing a sensitive natural community, jurisdictional waters, or riparian habitat. Additionally, the Project is not proposing to remove Protected trees or trees in the public right-of-way. Therefore, based on the results of the Project's BRR, these measures are not applicable to the Project.		

Mitigation Measure		Applies to Proposed Housing Project
Cultural Resources		
4.4-1(a)	Identification of Built-Environment Historical Resources	☒ Yes ☐ No
4.4-1(b)	Rehabilitation of Historical Resources	☐ Yes ☒ No
4.4-1(c)	Design Requirements for New Construction	☐ Yes ☒ No
4.4-1(d)	Relocation and Rehabilitation of Historical Resources	☐ Yes ☒ No
4.4-1(e)	Historic American Building Survey Documentation	☐ Yes ☒ No
4.4-1(f)	Interpretive Program	☐ Yes ☒ No
4.4-1(g)	Construction Monitoring, Salvage, and Reuse	☐ Yes ☒ No
4.4-1(h)	Temporary Protective Relocation	☐ Yes ☒ No
4.4-1(i)	Excavation and Shoring Plan	☐ Yes ☒ No
4.4-1(j)	Structural Construction Monitoring	☐ Yes ☒ No
4.4-2	Archaeological Resources	☒ Yes ☐ No
Brief explanation: MMs 4.4-1(b) through (j) are not applicable as the Project's historic resource assessment, as required in MM 4.4-1(a), determined there are no eligible historic resources on or near the site that would be impacted by the Project.		

Mitigation Measure		Applies to Proposed Housing Project
Geology and Soils		
4.5-1(a)	Paleontological Procedures for Discretionary Projects	☒ Yes ☐ No
4.5-1(b)	Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring	☐ Yes ☒ No
4.5-1(c)	Construction Monitoring	☐ Yes ☒ No
4.5-1(d)	Fossil Discovery, Salvage, and Treatment	☒ Yes ☐ No
Brief explanation: MM 4.5-1(b) applies when recommended by the assessment conducted in MM 4.5-1(a). The Project will include a Worker Environmental Awareness Program, but there is no evidence to indicate that monitoring would be necessary. MM 4.5-1(c) applies when recommended by the assessment conducted in MM 4.5-1(a). At this time, there is no indication that construction monitoring is necessary.		
Hazards and Hazardous Materials		
4.7-2(a)	Environmental Site Assessment	☐ Yes ☒ No
4.7-2(b)	Site Remediation and Health and Safety Plan	☐ Yes ☒ No
Brief explanation: MM 4.7-2(a) is applicable to sites located on or within 500 feet of a Hazardous Material site listed on a variety of databases. A review of the listed databases indicated that the Project Site is not located on or within 500 feet of any hazardous materials site. MM 4.7-2(b) is applicable to sites requiring remediation as identified during MM 4.7-2(a). As no sites were identified, this measure does not apply to the Project.		

Mitigation Measure		Applies to Proposed Housing Project
Hydrology and Water Quality		
4.8-1	Drainage Pattern Alterations and Flood Control	☐ Yes ☒ No
Brief explanation: MM 4.8-1 applies to projects that the City of Los Angeles Department of Public Works (DPW) has determined the standard regulations, including Low-Impact Development requirements, is not adequate as related to flood control and drainage. DPW is not requiring a flood control or drainage study for the Project. The City of Los Angeles Bureau of Engineering (BOE) confirmed that there are no requirements that would need to be met regarding flood zone clearance and compliance with the National Flood Insurance Program. Therefore, this measure is not applicable to the Project.		
Noise		
4.10-1(a)	Noise Shielding and Silencing	☒ Yes ☐ No
4.10-1(b)	Use of Driven Pile Systems	☒ Yes ☐ No
4.10-1(c)	Enclosures and Screening	☒ Yes ☐ No
4.10-1(d)	Construction Staging Areas	☒ Yes ☐ No
4.10-1(e)	Temporary Sound Barriers	☐ Yes ☒ No
4.10-1(f)	Project-Specific Construction Noise Study	☒ Yes ☐ No
4.10-2	Project-Specific Operational Noise Study	☐ Yes ☒ No
4.10-3(a)	Vibration Control Plan	☐ Yes ☒ No
4.10-3(b)	Vibration Mitigation	☒ Yes ☐ No
Brief explanation: Please see the Project's Noise Explanation at the end of the Housing Element Checklist.		

Mitigation Measure		Applies to Proposed Housing Project
Public Services		
4.12-1(a)	Design Plans Review	☐ Yes ☒ No
4.12-1(b)	Emergency Access	☐ Yes ☒ No
4.12-1(c)	Hillside Fire/Vegetation Management Plan	☐ Yes ☒ No
4.12-1(d)	Submittal of Plot Plan	☐ Yes ☒ No
4.12-2(a)	Crime Prevention Unit Consultation	☐ Yes ☒ No
4.12-2(b)	Security During Construction	☐ Yes ☒ No
Brief explanation: The City of Los Angeles Fire Department (LAFD) hydrants and access unit reviewed and approved the proposed Project plans. MMs 4.12-1(a)-(d) are applicable to discretionary housing project with more than 300 housing units or located in Very High Fire Hazard Severity Zone (VHFHSZ) or State Responsibility Areas (SRAs) where the LAFD finds that existing regulations are not adequate to avoid fire risk. While the Project is within the VHFHSZ, LAFD did not provide any comments indicating that existing regulations would be inadequate such that there would be a need for additional study. Therefore, these measures are not applicable to the Project. MMs 4.12-2(a)-(b) are applicable to discretionary projects with more than 300 units or on a project site of more than 10 acres. The Project would construct one SFR and an attached ADU unit on a 0.96-acre site. Therefore, these measures are not applicable to the Project.		
Transportation		
4.14-1	Construction Management Plan	☐ Yes ☒ No
4.14-2	Transportation Demand Management Program	☐ Yes ☒ No
Brief explanation: MM 4.14-1 is applicable to discretionary projects that City of Los Angeles Department of Transportation (LADOT) determines could potentially have impacts to the City's circulation system even with application of regulatory compliance measures. LADOT has reviewed the Project and does not find that a study is necessary or that compliance with existing regulations would not be adequate. Therefore, this measure is not applicable to the Project. MM 4.14-2 is applicable to discretionary projects that will have significant vehicle mile traveled (VMT) impacts in accordance with LADOT's Transportation Assessment Guidelines. It was determined that the Project would result in an increase of 8 daily vehicle trips, as this is substantially lower than the City's 250 daily trip threshold, this measure is not applicable to the Project.		

Mitigation Measure		Applies to Proposed Housing Project
Tribal Cultural Resources		
4.15-1(a)	Native American Consultation and Monitoring for Discretionary Projects	☒ Yes ☐ No
4.15-1(b)	Discovery of Potential Tribal Cultural Resources	☒ Yes ☐ No
Brief explanation:		
Wildfire		
4.17-1	Hillside Construction Staging and Parking Plan	☐ Yes ☒ No
4.17-3	Undergrounding of Power Lines in and Near an SRA and VHFHSZs	☒ Yes ☐ No
Brief explanation:		
MM 4.17-1 is applicable to discretionary projects located in or adjacent to an SRA or VHFHSZ, where LAFD finds it necessary to add additional conditions above existing regulations to reduce the risk of construction-related activities impairing an emergency response plan or emergency evacuation plan. LAFD has reviewed and approved the proposed Project plans, and did not require additional measures or studies. Therefore, this measure is not applicable to the Project.		

Substitute Mitigation Measures

THE APPLICANT FOR THE PROPOSED HOUSING PROJECT IS PROPOSING SUBSTITUTED MITIGATION MEASURES FOR ANY OF THE MITIGATION MEASURES THAT ARE CHECKED ABOVE

☐ Yes ☒ No

If YES, include the substituted mitigation measures below, with the necessary findings showing the mitigation measure is equal or more effective to the mitigation measures in the Mitigation Measure Program at reducing the significant impact to less than significant and no new significant impact will result from the substitution:

Any attachments or technical studies that support findings will need to be printed out and attached to the Appendix and will be included in the project file.

THE APPENDIX WILL BE FILLED OUT

☒ Yes ☐ No

Planner to fill out the Appendix page at the end of the checklist to list any substituted measures and any additional pages to support findings.

CONCLUSION

Check one of the following (Note: this may require the analysis in Section E to be completed first):

- ☐ None of the mitigation measures from the MMP are applicable to the Proposed Housing Project.
- ☒ All applicable mitigation measures (including substitute measures) will be imposed on the Proposed Housing Project through conditions of approval, or have already been incorporated into the Proposed Housing Project.
- ☐ Not all applicable mitigation measures will be imposed on the Proposed Housing Project through conditions of approval, or have already been incorporated into the Proposed Housing Project.

E. FINDING THAT SITE SPECIFIC EFFECTS FROM THE PROPOSED HOUSING PROJECT WERE ANALYZED IN THE PROGRAM EIR

E.1 Screening Criteria

The following screening questions shall be answered to evaluate whether the Proposed Housing Project has the potential for site-specific or project-specific circumstances or conditions to result in an environmental effect not examined in the Program EIR. If any of the following questions are answered 'Yes', further analysis will be required in Section E.2.

- a. Do any mitigation measures from the MMP require further analysis or study?

☐ Yes ☒ No

If **Yes**, prepare any studies and conduct any analysis required by the mitigation measure, per Section E.2.

- b. Does the Proposed Housing Project lack compliance with a mitigation measure (including a substitute mitigation measure) identified as applicable to the Proposed Housing Project in Section D?

☒ Yes ☐ No

If **Yes**, determine if the environmental effect was examined in the Program EIR, per Section E.2.

- c. Would the Proposed Housing Project require a variance or specific plan exception to provide relief from a standard required to protect scenic resources or scenic quality in an adopted Code, Specific Plan, or overlay ordinance (e.g., the Mulholland Scenic Parkway Specific Plan, the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan)?

☐ Yes ☒ No

If **Yes**, conduct an analysis of Questions I.a and I.c in Appendix G of the CEQA Guidelines to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- d. Would the Proposed Housing Project involve the modification or destruction of a scenic resource or obstruction of public view of a scenic resource?

☐ Yes ☒ No

If **Yes**, conduct an analysis of Questions I.a and I.c in Appendix G of the CEQA Guidelines to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- e. Would the Proposed Housing Project involve rezoning agriculturally zoned land?

☐ Yes ☒ No

If **Yes**, conduct an analysis of Question II.b in Appendix G of the CEQA Guidelines to determine if the Proposed Housing Project will have an effect that was not examined in the

Program EIR, per Section E.2.

- f. Would the Proposed Housing Project be within 50 feet of a fault delineated on the Alquist-Priolo Earthquake Fault Zoning Map?

☐ Yes ☒ No

If **Yes**, conduct an analysis of Question VII.a.i in Appendix G of the CEQA Guidelines to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- g. Would the Proposed Housing Project result in significant impacts to VMT using the thresholds and methodology provided in the LADOT Transportation Assessment Guidelines?

☐ Yes ☒ No

If **Yes**, conduct an analysis of VMT to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- h. Would the Proposed Housing Project have peculiar or unique project or site characteristics from those analyzed in the Program EIR that could result in an effect not examined in the Program EIR (e.g., projects that conflict with an adopted Airport Land Use Plan or Water Quality Management Plan, or sites in use for mineral resource recovery (does not include oil and gas), projects involving septic tanks)?

☒ Yes ☐ No

If **Yes**, conduct an analysis to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

- i. Is the project located within one mile of a freeway offramp and does it require a transportation assessment by the Los Angeles Department of Transportation (DOT)?¹

☐ Yes ☒ No

If **Yes**, conduct an analysis of freeway queueing, as required by DOT, to determine if the Proposed Housing Project will have an effect that was not examined in the Program EIR, per Section E.2.

¹ Transportation assessments are typically required if the project would both generate a net increase of 250 or more daily vehicle trips and would result in a net increase in daily VMT. DOT would also require a transportation assessment if the project is replacing an existing number of residential units with a smaller number of residential units, and the proposed project is located within one-half mile of a heavy rail, light rail, or bus rapid transit station.

CONCLUSION

After finishing review of the screening questions in Section E.1, check one of the following boxes.

☐ **ALL SCREENING QUESTIONS ARE MARKED ‘NO’**

Pursuant to CEQA Guidelines Section 15168(c)(4), the environmental effects of the Proposed Housing Project were within the scope of the Program EIR. Prepare a Mitigation and Monitoring Program for the Proposed Housing Project. No further analysis is required.

☒ **ONE OR MORE SCREENING QUESTIONS ARE MARKED ‘YES’**

Go to Section E.2.

E.2 Analysis to Determine if the Proposed Housing Project Would Have Effects Not Examined in the Program EIR

Instructions:

Conduct all analysis required in Section E.1 to determine if the Proposed Housing Project would have one or more environmental site- or project-specific effect(s) not examined in the Program EIR.

The following site- or project-specific effects are not effects that were examined in and within the scope of the Program EIR:

- a significant impact that would result because the Proposed Housing Project will not comply with a mitigation measure found applicable to the Proposed Housing Project from Appendix B, or will not comply with a substituted mitigation measure of equal or equivalent effectiveness (see Conclusion in Section D).
- a significant impact in an impact category found in the Program EIR to be less than significant, less than significant with mitigation, or have no impact;
- a significant impact that cannot be mitigated to less than significant with mitigation measures in Appendix B or by a substituted mitigation measure, in any of the following impact categories, which are impacts that by their nature would have impacts unique to the resource(s):
 - to a historical resource;
 - to a biological resource;
 - to an archaeological resource;
 - to a paleontological resource;
 - to tribal cultural resources;
 - related to hazardous materials; or
 - related to wildfires.

Without limitation, the following effects from a Proposed Housing Project are effects examined in and within the scope of the Program EIR:

- a significant and unavoidable impact related to criteria pollutant air quality standards from construction NO_x, PM₁₀ and PM_{2.5} emissions;

- a significant and unavoidable impact related to criteria pollutant air quality standards from operational NOX, VOC, PM₁₀, and PM_{2.5} emissions; or
- a significant and unavoidable impact (project or cumulative) related to construction and operational noise or vibration impacts.

CONCLUSION

Based on the analysis above, and the whole of the administrative record, substantial evidence supports that (check one):

- ☐ **THE PROPOSED HOUSING PROJECT WILL NOT HAVE EFFECTS NOT EXAMINED IN THE PROGRAM EIR.**

The Proposed Housing Project is fully within the scope of the program and its impacts were examined in the Program EIR. Prepare a Mitigation and Monitoring Program for the Proposed Housing Project for all mitigation measures identified in Subsection D and E, as applicable. No additional environmental analysis documents need to be prepared.

- ☒ **THE PROPOSED HOUSING PROJECT WILL HAVE ONE OR MORE EFFECTS NOT EXAMINED IN THE PROGRAM EIR.**

A tiered negative declaration or tiered environmental impact report will be prepared for the following environmental effect(s) pursuant to CEQA Guidelines Section 15152:

Impacts to be Analyzed in Tiered CEQA Clearance:

While the Program EIR evaluated potential impacts related to wildfire, due to the Project Site's proximity to the January 2025 Palisades Fire, the City has determined that the Project is required to conduct additional wildfire analysis. Additional wildfire analysis will be analyzed in a Focused Environmental Impact Report that will be prepared for the Project.

As required by the applicable Housing Element Checklist Program EIR Mitigation Measures, the following studies were completed for the Project and included as Appendices to this document:

Biological Resources Report
Tree Report
Cultural Resources Report
Historic Resources Assessment
Noise Study for Construction Emissions

As discussed in detail in each study, each required study concluded that impacts from the Project would be less than significant, prior to the implementation of mitigation measures; the Project will implement all applicable and feasible Housing Element Program EIR Mitigation Measures, which would further reduce the less than significant impacts. The Project's Mitigation Measure Applicability Table analyzes the applicability of the Housing Element Program EIR Mitigation Measures as they are/are not applicable to the Project. For measures where additional studies have been prepared (and are attached as an appendix), the conclusions of the technical studies are stated, all of which concluded that Project impacts would be less than significant.

All other effects are within the scope of the Program EIR and require no further analysis pursuant to CEQA Guideline Section 15152. The analysis provided herein shall be relied upon, in part, to support adoption of the tiered document as only being required to analyze the above listed impact(s).

APPENDIX

SUBSTITUTED MITIGATION MEASURES

List any Substituted Mitigation Measures, if any, along with any additional documents to support findings in the section below:

N/A

ANALYSIS

Complete, as applicable, based on Sections E.1 and E.2 above. Please attach any technical studies required and summarize the impact and the required mitigation measures and/or monitoring program for the Proposed Housing Project.

The following analysis is provided as required based on the following questions from Section E.1 and E.2:

Several of the Housing Element Program EIR Mitigation Measures which are applicable to the Project required the preparation of technical studies to determine potential impacts. All required technical studies have been completed for the Project and, as indicated by these studies, some additional Housing Element EIR mitigation measures are applicable to the Project.

Housing Element Checklist

Noise

Brief Explanation:

MM 4.10-1(e) requires the installation of temporary sound barriers. In accordance with CEQA, when a project would result in a significant and unavoidable impact, a lead agency must implement all feasible mitigation measures to reduce the potential impact. The Housing Element Program EIR included MM 4.10-1(c), Temporary Sound Barriers, a mitigation measure which would further reduce significant and unavoidable on-site construction noise impacts. MM 4.10-1(c) states, "Sound barriers, such as temporary walls or sound blankets, shall be erected between construction activities and noise-sensitive uses when construction activities are located within a line-of-sight to and within 500 feet of noise-sensitive uses. Requirement shall show on plans." As shown in the on-site and off-site noise analysis, the Project would not exceed the City's absolute construction noise threshold of 80 dBA. Thus, the Project's on- and off-site construction noise would be less than significant and no mitigation is necessary. As stated, the in the Housing Element's Program EIR Mitigation Monitoring Program, modifications and deletions to the Housing Element's Program EIR mitigation measures are allowed if the Department of City Planning cannot find substantial conformance with the measure, the Project analysis discloses the impacts without implementation of the mitigation measure(s), and the analysis explains why the measure is no longer needed. For a noise barrier to have any meaningful effect, the temporary wall or barrier would need to be constructed to a height that would obstruct or shield the equipment within a line of sight to and within 500 feet of Noise-Sensitive Uses and/or any observer within this distance. Given the steep topography and site access constraints, constructing such a noise barrier is technically infeasible.

For example, construction equipment will operate across the Project site at an approximate elevation between 259 feet to 289 feet. Mount Holyoke Avenue has an approximate street elevation of 289 feet fronting the entire Project site. The existing home along the northern boundary at 505 Radcliffe Avenue has a second-story floor elevation of approximately 300 feet, as will the homes currently being constructed across the street at 400 to 436 Mount Holyoke Avenue. To obstruct the line of sight from these Noise-Sensitive Uses to the equipment being operated on the Project site would require the construction of a temporary wall being approximately 40 feet tall along the western boundary as well as portions of the northern and southern boundaries. It would also require a temporary wall height of approximately 20 feet along the eastern boundary fronting the street which would also not be feasible due to the limited site access and construction staging requirements in this area. As such, the Project is not required to

implement MM 4.10-1(e), as the Project's noise analysis has demonstrated that on- and off-site construction noise impacts would be less than significant and no mitigation is required, and implementation of the mitigation measure is not technically feasible.

MM 4.10-2 requires preparation of a Project-Specific Operational Noise Study for projects with roof decks and/or pool decks. California Public Resources Code (PRC) Section 21085 states that for residential projects under the California Environmental Quality Act (CEQA), noise generated by project occupants and their guests is not a significant environmental impact. Therefore, this measure is not applicable to the Project.

MM 4.10-3(a) requires preparation of a Vibration Control Plan for projects that include vibratory rollers or sonic pile drivers. The Project would not include these methods. Therefore, this measure is not applicable to the Project.