

COUNTY CLERK'S USE

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION
(PRC Section 21152; CEQA Guidelines Section 15062)

Pursuant to Public Resources Code § 21152(b) and CEQA Guidelines § 15062, the notice should be posted with the County Clerk by mailing the form and posting fee payment to the following address: Los Angeles County Clerk/Recorder, Environmental Notices, P.O. Box 1208, Norwalk, CA 90650. Pursuant to Public Resources Code § 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS

AA-2023-6718-PMLA-SL-HCA (Preliminary Parcel Map) / ADM-2024-224-SLD-HCA (Administrative Review)

LEAD CITY AGENCY

City of Los Angeles (Department of City Planning)

CASE NUMBER

ENV-2023-6720-CE

PROJECT TITLE

233 and 233 1/2 North Robinson Street

COUNCIL DISTRICT

13 – Soto-Martinez

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map)

233 and 233 1/2 North Robinson Street, Los Angeles, CA 90026

Map attached.

PROJECT DESCRIPTION:

Additional page(s) attached.

A Preliminary Parcel Map for the subdivision of one (1) lot into three (3) small lots on a site that totals 6,005 square-feet. The project proposes the demolition of an existing duplex and an accessory building and the construction of three (3) new single-family dwelling with two (2) new attached Accessory Dwelling Units (ADUs). Lot 1 will consist of 1,992 square-feet of lot area and will be developed with a new 1,530 square-foot single-family dwelling "A" and a 626 square-foot attached ADU that together will be four-stories and rise to a maximum height of 35 feet and 5.5 inches. Lot 2 will consist of 1,755 square-feet of lot area and will be developed with a new 1,802 square-foot single-family dwelling "B" and an 870 square-foot attached ADU that together will be four-stories and rise to a maximum height of 35 feet and 7.5 inches. Lot 3 will consist of 2,258 square-feet of lot area and will be developed with a new 2,385 square-foot single-family dwelling "C" that will be four-stories and rise to a maximum height of 35 feet and 10 inches. Lot 3 will contain six (6) vehicle parking spaces on the ground-floor of proposed single-family dwelling "C." The project site was not found to have any protected trees or shrubs and does not have any street trees adjacent to the public right-of-way. However, the site does contain five (5) non-protected trees, all of which are proposed for removal.

NAME OF APPLICANT / OWNER:

Yukie Tanuma, 233 Property, LLC

CONTACT PERSON (If different from Applicant/Owner above)

N/A

(AREA CODE) TELEPHONE NUMBER

(213) 537-0910

EXT.

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

STATE CEQA STATUTE & GUIDELINES

STATUTORY EXEMPTION(S)

Public Resources Code Section(s) _____

CATEGORICAL EXEMPTION(S) (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33)

CEQA Guideline Section(s) / Class(es) 15303 / Class 3(b), 15315 / Class 15, and 15332 / Class 32

OTHER BASIS FOR EXEMPTION (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b))

JUSTIFICATION FOR PROJECT EXEMPTION:

Additional page(s) attached

See attached justification.

None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project.

The project is identified in one or more of the list of activities in the City of Los Angeles CEQA Guidelines as cited in the justification.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.

If different from the applicant, the identity of the person undertaking the project.

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE

Erick Morales



STAFF TITLE

Planning Assistant

ENTITLEMENTS APPROVED

Preliminary Parcel Map and Administrative Review for Small Lot Design Standards

DISTRIBUTION: County Clerk, Agency Record

Rev. 6-22-2021

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

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DEPUTY DIRECTOR

JUSTIFICATION FOR PROJECT EXEMPTION CASE NO. ENV-2023-6720-CE

The City of Los Angeles has determined based on the whole of the administrative record, that substantial evidence supports that the Project is exempt from CEQA pursuant to CEQA Guidelines Section 15303, Class 3(b) (New Construction of Small Structures), Section 15315, Class 15 (Minor Divisions of Land), Section 15332, Class 32 (Infill Development Project) and that none of the exceptions to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 apply.

Project Description:

The project located at 233 and 233 ½ North Robinson Street is for the subdivision of one (1) lot comprised of 6,005 square-feet of gross lot area into three (3) small lots for the construction, use, and maintenance of three (3) new single-family dwellings and two (2) new attached Accessory Dwelling Units (ADUs). Lot 1 will consist of 1,992 square-feet of lot area and will be developed with a new 1,530 square-foot single-family dwelling "A" and a 626 square-foot attached ADU that together will be four-stories with a maximum height of 35 feet and 5.5 inches. Lot 2 will consist of 1,755 square-feet of lot area and will be developed with a new 1,802 square-foot single-family dwelling "B" and an 870 square-foot attached ADU that together will be four-stories with a maximum height of 35 feet and 7.5 inches. Lot 3 will consist of 2,258 square-feet of lot area and will be developed with a new 2,385 square-foot single-family dwelling "C" that will be four-stories and with a maximum height of 35 feet and 10 inches. Lot 3 will contain six (6) vehicle parking spaces on the ground floor of proposed single-family dwelling "C." An arborist report was prepared on July 31, 2023 by Paul Lewis, Registered Consulting Arborist #800, and states that there are five (5) existing non-protected trees on the project site, none of which are in the public right-of-way. All five (5) non-protected trees are proposed for removal.

As a development with a total of three (3) single-family dwellings with two (2) attached ADUs and a parcel map creating three (3) small lots, the project qualifies for Section 15303, Class 3, Section 15313, Class 15, and Section 32, Class 32 categorical exemptions. The following section discusses how the project meets the requirements of Class 3, Class 15 and Class 32 in detail:

Class 3 consists of the construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the surface. The number of structures described in this section are the

maximum allowable on any legal parcel. Examples of this exemption include but are not limited to:

- a) One single-family residence, or a second dwelling unit in a residential zone. In urbanized areas, up to three single-family residences may be constructed or converted under this exemption.

The project proposes a Preliminary Parcel Map for the subdivision of one (1) lot into three (3) small lots for the construction, use, and maintenance of three (3) new single-family dwellings and two attached ADUs to the new single-family dwellings on Lots 1 and 2. The project site is located wholly within an urbanized area of the City of Los Angeles. Therefore, the project meets all the criteria for a Class 3 categorical exemption.

Class 15 consists of the division of property in urbanized areas zoned for residential, commercial, or industrial use into four or fewer parcels when the division is in conformance with the General Plan and zoning, no variances or exceptions are required, all services and access to the proposed parcels to local standards are available, the parcel was not involved in a division of a larger parcel within the previous 2 years, and the parcel does not have an average slope greater than 20 percent.

The project proposes the subdivision of one (1) lot in the RD2-1 Zone into a maximum of three (3) small lots and does not propose any variances or exceptions. The project site is flat, can be accessed and provided services at local standards, and was not the result of the division of a larger parcel within the previous 2 years. Therefore, the project meets all of the criteria for a Class 15 categorical exemption.

A Class 32 Categorical Exemption may be applied for a project if it is developed on an infill site and meets the following criteria:

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

The site is zoned RD2-1 and has a General Plan Land Use Designation of Low Medium Residential. As shown in the case file, the project is consistent with the applicable Westlake Community plan designation and policies and all applicable zoning designations and regulations. The project site is wholly within the City of Los Angeles, on a site that is approximately 0.138 acres (6,005 square-feet). Surrounding properties are developed with residential uses. Properties immediately to the north, south, and east across Robinson Street are zoned RD2-1, are designated for Low Medium Residential land uses, and are developed with single-family and multi-family residences that range in height from one- to three-stories. Properties immediately to the west across the alley are zoned R3-1, zoned for Medium Residential land uses, and are developed with single-family and multi-family residences that range in height from one- to two-stories. All surrounding properties are located in the Westlake Community Plan. The project site is previously disturbed and surrounded by development and therefore it is not, and has no value as, a habitat for endangered, rare, or threatened species. There are no protected trees on the

site, as identified in the Arborist Report prepared by Paul Lewis, Registered Consulting Arborist #800 dated July 31, 2023. However, the site does contain 5 non-protected trees, all of which are proposed for removal.

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance, pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. These RCMs will ensure the project will not have significant impacts on noise and water. Furthermore, a Vehicle Miles Traveled (VMT) analysis shows that the project generates 33 daily vehicle trips and does not exceed the threshold criteria established by the Los Angeles Department of Transportation (LADOT) of 250 daily vehicle trips for preparing a traffic study. Therefore, the project will not have any significant impacts to traffic. Interim thresholds were developed by Department of City Planning (DCP) staff based on CalEEMod model runs relying on reasonable assumptions, consulting with Air Quality Management District (AQMD) staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established South Coast Air Quality Management District (SCAQMD) construction and operational thresholds. The project site will be adequately served by all public utilities and services given that the project site is presently developed with a duplex and an accessory building, which are proposed for demolition to allow for the construction, use, and maintenance of three (3) single-family dwellings on the site. Therefore, the project meets all of the criteria for the Class 32 categorical exemption.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions.

The City has considered whether the proposed Project is subject to any of the six (6) exceptions that would prohibit the use of a categorical exemption as set forth in State CEQA Guidelines Section 15300.2. The six (6) exceptions to this Exemption are: (a) Location; (b) Cumulative Impacts; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources.

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

While the subject site is located within a Special Grading Area and a Hillside Area, specific Regulatory Compliance Measures (RCMs) in the City of Los Angeles regulate the grading and construction of projects in these particular types of “sensitive” locations and will reduce any potential impacts to less than significant. Regulatory Compliance Measures (RCMs) include:

- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.
- **Regulatory Compliance Measure RC-GEO-2 (Hillside Grading Area):** The grading plan shall conform with the City's Landform Grading Manual guidelines, subject to approval by the Advisory Agency and the Department of Building and Safety's Grading Division. Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section

91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.

These RCMs have been historically proven to work to the satisfaction of the City Engineer to reduce any impacts from the specific environment the project is located. Additionally, the project is not located within a very high fire hazard severity zone, a flood zone, a landslide area, or a liquefaction area. Thus, the location of the project will not result in a significant impact based on its location.

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

The project proposes the demolition of an existing duplex and accessory structure and the construction, use, and maintenance of three (3) single-family dwellings and two (2) new attached Accessory Dwelling Units. Lot 1 will consist of 1,992 square-feet of lot area and will be developed with a new 1,530 square-foot single-family dwelling "A" and a 626 square-foot attached ADU that together will be four-stories with a maximum height of 35 feet and 5.5 inches. Lot 2 will consist of 1,755 square-feet of lot area and will be developed with a new 1,802 square-foot single-family dwelling "B" and an 870 square-foot attached ADU that together will be four-stories with a maximum height of 35 feet and 7.5 inches. Lot 3 will consist of 2,258 square-feet of lot area and will be developed with a new 2,385 square-foot single-family dwelling "C" that will be four-stories and with a maximum height of 35 feet and 10 inches. Lot 3 will contain six (6) vehicle parking spaces on the ground floor of proposed single-family dwelling "C." The project site was not found to have any protected trees or shrubs and does not have any street trees adjacent to the public right-of-way. Five (5) non-protected trees are proposed for removal.

Within a 500-foot radius, three (3) subdivisions have been approved in the past. On March 17, 2008, the Deputy Advisory Agency approved Vesting Tentative Tract Map No. VTT-63038-CN-DB for 16 residential condominium units on one lot and 98 senior citizen housing market-rate units and two commercial condominium units on another lot, located at 322 North Robinson Street and 3221 West Temple Street. On May 13, 2016, the Deputy Advisory Agency approved Vesting Tentative Tract Map No. VTT-73982-SL for eight (8) small lots at 322 North Robinson Street. On February 16, 2018, the Deputy Advisory Agency approved Vesting Tentative Tract Map No. VTT-74377 for a 221-unit residential condominium at 235 North Hoover Street. While there are similar subdivision projects near the project site, there are no other similar projects within a 500-foot radius and this does not create a cumulative impact of a succession of known projects of the same type and in the same place as the subject project. Therefore, in conjunction with Citywide Regulatory Compliance Measures (RCMs) and compliance with other applicable regulations, no foreseeable cumulative impacts are expected.

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

The project proposes to demolish the existing duplex and accessory structure and construct three (3) single-family dwellings in an area zoned and designated for such development. The site also contains five (5) non-protected trees, all of which will be removed. Surrounding properties are developed with residential uses. Properties immediately to the north, south, and east across Robinson Street are zoned RD2-1, are designated for Low Medium

Residential land uses, and are developed with single-family and multi-family residences that range in height from one- to three-stories. Properties immediately to the west across the alley are zoned R3-1, zoned for Medium Residential land uses, and are developed with single-family and multi-family residences that range in height from one- to two-stories. All surrounding properties are located in the Westlake Community Plan. The size of the proposed project, which contains a total of 7,214 square-feet of floor area on an approximately 6,005 square-foot site results in a 1.8:1 Floor Area Ratio (FAR), which is not unusual for the vicinity and is similar in scope to other existing residential uses in the area. Thus, there are no unusual circumstances which may lead to a significant effect on the environment and this exception does not apply.

- (d) Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park, located approximately 17.5 miles to the west of the site. Therefore, the project will not result in damage to any scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway, and this exception does not apply.

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

According to Envirostor, the State of California's database of Hazardous Waste Sites, neither the Subject Site, nor any site in the vicinity, is identified as a hazardous waste site within 1,000 feet of the project site.

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

The Project Site has not been identified as a historic resource by local or state agencies, and the Project Site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register; and was not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey Of Los Angeles. Email correspondence from the Office of Historic Resources dated October 10, 2024 confirms that the existing dwelling has been altered significantly and would not be considered an eligible historic resource. As such, the City does not choose to treat the site as a historic resource. Based on this, the Project will not result in a substantial adverse change to the significance of a historic resource and this exception does not apply.