

Attachment A

CEQA FINDINGS FOR CATEGORICAL EXEMPTION

In approving Developer's application for entitlements for the Project, the City determined that the Project as originally proposed qualified for a categorical exemption under CEQA Guidelines Section 15332 (Class 32 - Infill Development). The recent changes to the Project have either had no impact on or lessened the intensity of use of the Project. We have reviewed the information and reports previously provided to the City to evaluate the suitability of a Class 32 Exemption for the proposed action and conclude that the exemption applies.

A project qualifies for a Class 32 Categorical Exemption 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.

The subject site is located within the West Adams - Baldwin Hills - Leimert Community Planning Area and is designated for Community Commercial, with corresponding zones of CR, C1 .5, C2, C4, R3, R4, RAS3, and RAS4 zones. The site is zoned C2-2D-SP and located in the Subarea E of the Crenshaw Corridor Specific Plan.

The City found that the Project as originally proposed (a nine-story, 93-foot-tall mixed-use building with 89,694 square-feet of Floor Area, including 100 dwelling units, 1 accessory dwelling unit and 10,439 square feet of commercial space at the ground floor and roof level on an approximately 20,639 square foot lot, and with 15 automobile spaces on-site and one hundred and fifty-eight (158) bicycle parking spaces) was consistent with the applicable West Adams - Baldwin Hills - Leimert Community Planning Area designation and policies and all applicable zoning designations and regulations.

Developer intends to seek modifications to the entitlements previously received from the City that would conform to the current proposal, which would reduce the number of units, eliminate the commercial component, eliminate vehicle parking, and reduce the height of the Project. However, the proposed deal terms include a requirement that the Project as re-entitled be consistent with the City's existing applicable general plan designation, general plan policies, zoning designation and zoning regulations. Accordingly, this criterion is met.

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

The subject site consists of a level, rectangular site measuring 1.105 acres and is

wholly within the City of Los Angeles. The property adjacent to the north is zoned C2-2D-SP and is developed with a single-story, commercial building. Properties to the east across Crenshaw Boulevard are zoned C2-1-SP and are developed with single-story commercial buildings. The property adjacent to the south is zoned C2-2D-SP and is paved with a commercial parking lot. Properties to the west across the alley include a parking lot serving nearby commercial uses and a multi-family residential building.

c. The Project site has no value as habitat for endangered, rare or threatened species.

The subject site is currently developed with a commercial structure proposed to be demolished. Further, the subject site is surrounded by existing commercial and residential properties, and there are no existing trees on the subject site. Therefore, the subject site is not, and has no value as a 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.

As originally approved by the City, the Project was 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. More specifically, RCMs include, without limitation:

- Regulatory Compliance Measure RC-AQ-1 (Demolition, Grading and Construction Activities): Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
 - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
 - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
 - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
 - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
 - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
 - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

- Trucks having no current hauling activity shall not idle but be turned off.
- 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-N0-1 (Demolition, Grading, and Construction Activities): The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Compliance with these RCMs will reduce any potential impacts to less than significant and will ensure the Project will not have significant impacts on noise and water. The proposed deal terms require that the Project, as re-entitled, must comply with these RCMs.

As noted in the Los Angeles Department of Transportation (LADOT) Assessment form dated December 14, 2021, the Project as originally proposed would not exceed the threshold criteria established by the LADOT for preparing a traffic study, and thus would not have any significant impacts to traffic. As revised, the Project would have fewer units than originally proposed, eliminate the commercial component, and eliminate vehicle parking, all of which would reduce vehicle trip generators and thus further reduce the Project's vehicle miles traveled and impacts to traffic.

The City also found that the originally proposed project would not have significant impacts on air quality based on interim thresholds were developed by the Los Angeles Department of City Planning staff based on California Emissions Estimator Model (CalEEMod) runs relying on reasonable assumptions, consulting with AQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. The revised Project's reduction of vehicle trip generators would further reduce operational air quality impacts.

Accordingly, the proposed action would not result in any significant effects relating to traffic, noise, air quality, or water quality

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

The Project site is currently developed. The City previously found that the Project would be adequately served by all public utilities and services given that the Project is in a highly urbanized area with existing utilities and public services and is on a parcel zoned for the proposed use and density. The revised Project reduces the number of units and eliminates the commercial component, further reducing demand for utilities and public services. Accordingly, this criterion is met.

For all of the above reasons, the proposed action would meet the requirements of the Class 32 Exemption.

Exceptions Narrative for Class 32 Categorical Exemption

There are five (5) Exceptions which must be considered in order to find a project exempt under Class 32:

a. 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.*

Staff has identified two projects of the same type within a 500-foot radius of the Project site:

- Crenshaw Lofts: Recent construction of a residential building including 195 rental units and 110 parking spaces within seven-story building. Construction fully complete.
- 4345-4357 S. Crenshaw Affordable Housing: Proposed project includes a five-story mixed-use development containing 56 multi-family residential dwelling units situated above 1,961 square-feet of ground floor restaurant and a 11-stall automobile parking facility.

Construction of the Crenshaw Lofts project is already complete. The proposed 4345-4347 S. Crenshaw project is smaller than the proposed Treehouse Project. The development schedule of that project, if it were to be approved, is unknown, though there is a potential that the construction schedules of the two projects could overlap. However, there is no evidence that the impacts of constructing the two projects concurrently would be cumulatively significant. There is also no evidence that these three residential buildings, located in a highly urbanized area, would have any operational impacts that would be cumulatively significant

b. Significant Effect Due to Unusual Circumstances. *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 proposed project is for the construction of a residential building with 97 dwelling units. All surrounding properties are developed with commercial and residential buildings. There are no known unusual circumstances which may lead to a significant effect on the environment.

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

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. The portion of State Route 27 which travels through the Los Angeles city limits is approximately 22 miles from the subject site. Therefore the subject site will not create any impacts within a highway designated as a state scenic highway.

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

According to Envirostor, the State of California's database of Hazardous Waste Sites, neither the subject site, nor any site within a 1,000-foot radius of the subject site, is identified as a hazardous waste site.

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

The project site is developed with a commercial property and 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. Further, the project site was not found to be a potential historic resource based on the City's Historic Places LA website or Survey LA, the citywide survey of Los Angeles. Neither the State nor the City have chosen to treat the site as a historic resource, therefore, the proposed project cannot cause a substantial adverse change in the significance of a historical resource and this exception does not apply.