

APPLICATIONS

APPEAL APPLICATION Instructions and Checklist



PURPOSE

This application is for the appeal of Los Angeles Department of City Planning determinations, as authorized by the LAMC. For California Environmental Quality Act Appeals, use form [CP13-7840](#). For Building and Safety Appeals and Housing Department Appeals, use form [CP13-7854](#).

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

- ☐ Area Planning Commission (APC) ☐ City Planning Commission (CPC) ☒ City Council
☐ Zoning Administrator (ZA)

CASE INFORMATION

Case Number: CPC-2024-3202-DB-PR-VHCA

APN: 5528003199

Project Address: 8251-8271 West Melrose Ave. & 705-711 N. Harper Ave, Los Angeles CA 90046

Final Date to Appeal: 8/21/2025

APPELLANT

Check all that apply.

- ☐ Person, other than the Applicant, Owner or Operator claiming to be aggrieved
☐ Representative ☒ Property Owner ☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Eva Nathanson

Company/Organization: _____

Mailing Address: 715 1/2 N Harper Ave.

City: Los Angeles **State:** CA **Zip Code:** 90046

Telephone: 310-259-0820 **E-mail:** Evap.nathanson@gmail.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

☒ Self ☐ Other: _____

Is the appeal being filed to support the original applicant's position? ☐ YES ☒ NO

REPRESENTATIVE / AGENT INFORMATION

Name: Andrew Sachs

Company/Organization: _____

Mailing Address: 715 N Harper Ave

City: Los Angeles **State:** CA **Zip Code:** 90046

Telephone: 323-363-3672 **E-mail:** andrew.sachs@gmail.com

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part? ☐ Entire ☒ Part

Are specific Conditions of Approval being appealed? ☒ YES ☐ NO

If Yes, list the Condition Number(s) here: 1, 9, 15, 30

On a separate sheet provide the following:

☒ Reason(s) for the appeal

☒ Specific points at issue

☒ How you are aggrieved by the decision

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature: 

Date: 8/18/25

GENERAL NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: \$178

Reviewed & Accepted by (DSC Planner): Ruben Vasquez

Receipt No.: 200300329908

Date: 08/19/2025

☐ Determination authority notified

☐ Receipt Number

GENERAL APPEAL FILING REQUIREMENTS

If dropping off an appeal at a Development Services Center (DSC), the following items are required. See also additional instructions for specific case types. To file online, visit our [Online Application System \(OAS\)](#).

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

☐ Appeal Application

☐ Justification/Reason for Appeal

- ☐ Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

- ☐ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., “Appeal Form”, “Justification/Reason Statement”, or “Original Determination Letter”). No file should exceed 70 MB in size.

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with [LAMC Section 19.01 B.1\(a\) of Chapter 1](#) or [LAMC Section 15.1.1.F.1.a. \(Appeal Fees\) of Chapter 1A](#) as applicable, or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.
- ☐ *Aggrieved Party.* The fee charged shall be in accordance with [LAMC Section 19.01 B.1\(b\) of Chapter 1](#) or [LAMC Section 15.1.1.F.1.b. \(Appeal Fees\) of Chapter 1A](#) as applicable

4. Noticing Requirements (Applicant Appeals Only)

- ☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. See the Mailing Procedures Instructions ([CP13-2074](#)) for applicable requirements.

SPECIFIC CASE TYPES

ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITIES (TOC)

Appeal procedures for DB/TOC cases are pursuant to [LAMC Section 13B.2.5. \(Director Determination\) of Chapter 1A](#) or [LAMC Section 13B.2.3. \(Class 3 Conditional Use\) of Chapter 1A](#) as applicable.

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.

- ☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to [LAMC Section 12.37 I of Chapter 1](#) or [LAMC Section 10.1.10. \(Waiver and Appeals\) of Chapter 1A](#) as applicable.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant [LAMC Section 13B.7.3.G. of Chapter 1A](#).

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to [LAMC Section 13B.6.2.G. of Chapter 1A](#). Nuisance Abatement/Revocations cases are only appealable to the City Council.

Appeal Fee

- ☐ *Applicant (Owner/Operator)*. The fee charged shall be in accordance with the [LAMC Section 19.01 B.1\(a\) of Chapter 1](#) or [LAMC Section 15.1.1.F.1.a. \(Appeal Fees\) of Chapter 1A](#) as applicable.

For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under [LAMC Section 19.01 B.1\(a\) of Chapter 1](#) shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

- ☐ *Aggrieved Party*. The fee charged shall be in accordance with the [LAMC Section 19.01 B.1\(b\) of Chapter 1](#) or [LAMC Section 15.1.1.F.1.b. \(Appeal Fees\) of Chapter 1A](#) as applicable.

Eva Nathanson & Andrew Sachs
715 N. Harper Ave
Los Angeles, CA 90046
323-363-3672

August 17, 2025

To:

Los Angeles City Council
Los Angeles City Planning Commission

Appelants:

Eva Nathanson, property owner
715 - 715 ½ N. Harper Ave., Los Angeles, CA 90046

Andrew Sachs, tenant
715 N. Harper Ave., Los Angeles, CA 90046
andrew.sachs@gmail.com

Re: Appeal of CEQA Categorical Exemption
8251–8271 W. Melrose Ave. / 705–711 N. Harper Ave.
Environmental Case No.: ENV-2024-3203-CE
Related Case No.: CPC-2024-3202-DB-PR-VHCA

I. Introduction and Request for Relief

We live at 715 and 715 ½ N. Harper Avenue, directly adjacent and affected by the proposed demolition and construction at 8251–8271 West Melrose Avenue and 705–711 North Harper Avenue (“Project”). We appeal the City Planning Commission’s August 6, 2025 determination granting a **Class 32 (In-Fill Development Projects)** categorical exemption under CEQA Guidelines §15332.

Based on the whole record, there is substantial evidence that:

1. **The City did not demonstrate consistency with all applicable General Plan policies** as required by CEQA Guidelines §15332(a) and *United Neighborhoods for Los Angeles v. City of Los Angeles* (2023) 93 Cal.App.5th 1074.
2. **The record lacks substantial evidence** to support the required §15332(d) finding that the project will have no significant effects relating to traffic, noise, air quality, or water quality.
3. **Exceptions to categorical exemptions under CEQA Guidelines §15300.2 apply** due to unusual circumstances and cumulative impacts, precluding reliance on Class 32.

Under *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, if there is any substantial evidence in the record supporting a fair argument that a project may have a significant environmental effect, a categorical exemption cannot be used.

We respectfully request that the City Council grant this appeal, set aside the categorical exemption, prohibit any demolition of the existing structures, and require appropriate CEQA review, either an Initial Study/MND or an Environmental Impact Report, to address the deficiencies described below.

II. Failure to Demonstrate Consistency with All Applicable General Plan Policies (§15332(a))

The Letter of Determination (LOD) states on page 14 that the project is “consistent with applicable General Plan objectives and policies,” but the analysis is limited primarily to the Framework and Community Plan land use designations.

The *United Neighborhoods* decision holds that to rely on a Class 32 exemption, the City must:

- Identify **all applicable policies** from all General Plan elements;
- Provide **evidence in the record** supporting consistency with each; and
- Address **conflicts or tensions** among applicable policies.

Here, the LOD and administrative record fail to address multiple relevant policies, including:

- **Mobility Element:** Emergency access (Harper Avenue already suffers from illegal parking and gridlock; the project adds a driveway in the pinch point, affecting EMT access to the senior facility at 745 N. Harper).
- **Safety Element:** Geologic/hydrologic hazards (site has a high groundwater table; excavation of ~20,194 cubic yards for two subterranean levels poses settlement risk, as evidenced by past damage at our property from nearby excavation).
- **Noise and Air Quality Elements:** Protection of sensitive receptors (seniors, older homes with single-pane windows) from construction phase and long term use of loading dock will increase ongoing dust, diesel emissions, and noise.
- **Housing Element:** Preservation of neighborhood livability during extended demolition and construction.

Without a complete, evidence-supported, **policy-by-policy analysis** as *United Neighborhoods* requires, the §15332(a) consistency finding is legally inadequate.

III. Lack of Substantial Evidence for “No Significant Effects” Finding (§15332(d))

A. Traffic and Emergency Access

The record contains no site-specific circulation study for Harper Avenue, despite well-documented congestion from tourist vehicles and illegal red-zone parking that block two-way traffic. Adding a garage entrance on this short segment, close to a senior facility, presents a reasonable possibility of significant emergency access impacts.

B. Noise and Air Quality

Construction will occur within 30 feet of our home. The placement of a loading dock adjacent to our residences will increase noise and reduce air quality on an ongoing basis. Our building has single pane windows and we have elderly and children living here.

The record includes no quantified noise analysis, air dispersion modeling, or enforceable mitigation measures. Reliance on generic “regulatory compliance” is improper. (*West Adams Heritage Assn. v. City of Los Angeles* (2024) [Second Dist.] — appellants prevailed.)

C. Water Quality and Soils

The record contains no hydrology or geotechnical study addressing high groundwater dewatering, soil stability, or settlement risks from excavation. These are plausible significant effects on water quality and structural safety. The requirement that developers provide these reports prior to grading and construction has been proven to be ineffective in protecting private property and public spaces in previous developments approved on Sweetzer Ave, which have resulted in significant and ongoing environmental impacts.

IV. Exceptions to Categorical Exemptions Apply (§15300.2)

A. Unusual Circumstances (§15300.2(c))

The combination of high groundwater, adjacency to older structures with prior settlement damage, and location on a short, congested street critical to EMT access constitutes unusual circumstances creating a reasonable possibility of significant effects. (*Berkeley Hillside* — appellants prevailed.)

B. Cumulative Impacts (§15300.2(b))

The Melrose/Harper area has multiple recent and pending mid-rise projects. No cumulative traffic, noise, or groundwater analysis appears in the record.

C. Significant Effect – Geologic/Hydrologic Risk

Documented structural damage from prior nearby excavation at 714-718 and 728 N. Sweetzer confirms this is not speculative. The planned excavation for this project raises a reasonable possibility of similar significant effects.

D. Significant Effect – Traffic/Emergency Access

Harper's pinch point already blocks traffic; adding driveway ingress/egress here risks further impeding EMT access to 745 N. Harper (Shalom Gardens) and surrounding residents. CEQA Appendix G lists emergency access interference as a potential significant impact.

The proposal of a loading zone on an alley that already has two (2) residential parking access points (ours is directly across from the proposed loading zone, and the 714 N Sweetzer parking entrance is also off the alley) would additionally impair our ability to enter and exit freely and could significantly delay emergency access to 715 ½ N Harper, Eva's home in the back house. Although this is a factor regardless of the resident, it is worth noting that Eva is in her mid-80s and a survivor of the holocaust.

Our emergency access is also likely to be significantly impaired for the duration of the proposed excavation and construction process due to construction vehicle traffic.

E. Significant Effect – Construction Air Quality & Noise

Excavation and export of over 20,000 cubic yards will generate hundreds of diesel truck trips, producing PM10/PM2.5 and NOx emissions potentially exceeding SCAQMD thresholds. Construction noise will likely exceed LAMC standards.

We will be significantly affected due to our proximity and our single pane louvered windows.

V. Legal Basis for Appeal — CEQA Precedents

- **United Neighborhoods v. City of Los Angeles** (2023) 93 Cal.App.5th 1074 — *Appellants prevailed*. Court required policy-by-policy analysis for Class 32(a) consistency.
- **Berkeley Hillside Preservation v. City of Berkeley** (2015) 60 Cal.4th 1086 — *Appellants prevailed*. Established that substantial evidence of a fair argument defeats an exemption.
- **West Adams Heritage Assn. v. City of Los Angeles** (2024) [Second Dist.] — *Appellants prevailed*. Rejected boilerplate reliance on “regulatory compliance” in place of evidence.
- **Saint Ignatius Neighborhood Assn. v. City & County of San Francisco** (2022) 85 Cal.App.5th 1063 — *Appellants prevailed*. Found exemption improper where scale of project created potential significant effects.
- **Save Our Schools v. Barstow USD** (2015) 240 Cal.App.4th 128 — *Appellants prevailed*. Exemption reversed due to lack of evidence supporting “no impacts” conclusion.

- **McQueen v. Bd. of Directors** (1988) 202 Cal.App.3d 1136 — *Appellants prevailed*. Project description omitted key facts, violating CEQA's requirement for accuracy and completeness.

VI. Conclusion and Relief Requested

Because substantial evidence exists of potential significant impacts related to:

- Geologic instability from excavation in high groundwater conditions;
- Traffic congestion and emergency access interference;
- Short-term (from construction) and Long-term (from Loading dock) significant air quality and noise impacts;
- Cumulative effects with other local projects,

...the Project does not qualify for the Class 32 exemption, and the “no exceptions” finding is unsupported.

Requested Actions:

1. **Grant this appeal** and set aside the CEQA Class 32 categorical exemption determination;
2. **Prohibit any demolition, grading, or building** until the cumulative environmental and traffic issues are evaluated by independent experts and not just the developer's own contractors.
 - a. To allow demolition before the completion of the appropriate studies exposes the community to the risk of yet another long-term vacant lot in our immediate area, in the likely event the report indicates the area cannot support two subterranean parking levels.
 - b. This concern is not hypothetical. While David Pourbaba is listed as the developer, the project is being undertaken by Kia Illulian of the Illulian Group, which is affiliated with Jason Illulian's Faring. Faring currently has at least two stalled developments— 8920 Sunset Boulevard and Robertson Lane, the latter having been approved by the West Hollywood City Council on June 4, 2018. (over 7 years ago!)
 - c. Our neighborhood is already burdened with a number of such vacant lots, which contribute to blight and public safety concerns. These properties frequently attract encampments and present fire hazards. We experienced this when Etco Homes' CWV-Sweetzer LLC demolished RSO housing for the project at 728 N Sweetzer.
3. **City to prepare Full Environmental Impact Report** before this project is allowed to move forward.

4. Propose **relief measures** to us should the development proceed.
5. **Require the developer to add our property as additionally insured** and loss payee on their insurance policy for any demolition, grading, or construction, and require they cover any deductible for claims made.

Sincerely,

Eva Nathanson, Owner
Andrew Sachs, Tenant
715 + 715 ½ N. Harper Ave., Los Angeles, CA 90046
andrew.sachs@gmail.com

Please note attached Exhibits:

Exhibit A - Applicable General Plan Policies Not Analyzed in LOD

Exhibit B - CEQA Case Law Supporting Appeal

Exhibit C - Facts → CEQA Criteria → Supporting Case Law

Please note additionally submitted Exhibits:

Exhibit D - Evidence of Geologic/Hydrologic Concerns (note related documents)

Exhibit E - Traffic Congestion & Emergency Access Blockages

Exhibit F - Air Quality & Noise Sensitivity

Exhibit G - City Oversight Gaps (note related documents)

Exhibit G - Map of Melrose-Harper Area - Annotated

Exhibit A - Applicable General Plan Policies Not Analyzed in LOD

General Plan Element	Policy / Objective	Relevance to Project	How City's Finding Is Inadequate
Mobility Element	<i>Policy 6.8</i> – Ensure adequate emergency access to all parts of the City.	Harper Ave is a short, narrow segment with chronic congestion from tourist stopping and illegal parking; proposed garage entrance would further impede access, especially to 745 N. Harper senior facility.	No circulation study or evidence showing EMT access will not be impeded.
	<i>Policy 3.1</i> – Support safe and efficient local circulation.	Harper pinch point already blocks two-way traffic; increased ingress/egress from 96 parking spaces will worsen this.	No traffic analysis addressing localized congestion.
Safety Element	<i>Policy 1.2.2</i> – Ensure new development accounts for site-specific geologic conditions, including groundwater.	Site is in high water table area; prior nearby excavation caused damage to 715 N. Harper.	No hydrology/geotechnical analysis in record; excavation impacts unstudied.
Noise Element	<i>Objective 4</i> – Minimize noise impacts on sensitive uses.	Seniors and nearby residents in old homes with poor sound insulation are directly adjacent.	No quantified construction noise analysis; reliance on generic compliance statements.
Air Quality Element	<i>Policy 4.1.1</i> – Reduce particulate emissions from construction activities.	Construction dust/diesel emissions will affect seniors and nearby residents with open windows.	No dispersion modeling or enforceable dust control plan.
Housing Element	<i>Policy 1.4.1</i> – Preserve the quality and character of existing residential neighborhoods.	Demolition and multi-year construction will impact livability through traffic, dust, noise.	No analysis of construction-phase livability impacts.

Exhibit B – CEQA Case Law Supporting Appeal

1. United Neighborhoods for Los Angeles v. City of Los Angeles

(2023) 93 Cal.App.5th 1074 — **Appellants prevailed**

Holding: City cannot rely on Class 32 exemption without showing **policy-by-policy consistency** with *all* applicable General Plan elements, not just land use. Must also address conflicts between policies.

Why it applies: The City's LOD only addressed Framework and Community Plan policies, ignoring Safety, Mobility, Noise, Air Quality, and Housing Element policies directly implicated by this Project.

Relevance: Undermines §15332(a) finding of "General Plan consistency."

2. Berkeley Hillside Preservation v. City of Berkeley

(2015) 60 Cal.4th 1086 — **Appellants prevailed**

Holding: Even if a categorical exemption could apply, the "unusual circumstances" exception (§15300.2(c)) bars it where substantial evidence supports a "fair argument" of potential significant effects.

Why it applies: Evidence of high groundwater table, prior structural damage, and emergency access concerns create unusual circumstances here.

Relevance: Supports application of §15300.2(c) to bar Class 32 exemption.

3. West Adams Heritage Assn. v. City of Los Angeles

(2024) [Second Dist.] — **Appellants prevailed**

Holding: Generic reliance on "existing regulations" is insufficient to show no significant impact; agency must provide **project-specific evidence**.

Why it applies: City relied on boilerplate compliance statements without actual hydrology, noise, air quality, or traffic studies for this Project.

Relevance: Undermines §15332(d) finding of "no significant effects."

4. Saint Ignatius Neighborhood Assn. v. City & County of San Francisco

(2022) 85 Cal.App.5th 1063 — **Appellants prevailed**

Holding: Class 1 and Class 3 exemptions invalid where large-scale project (90-ft stadium lights) presented a reasonable possibility of significant effects.

Why it applies: Large-scale subterranean excavation and six-story mixed-use construction adjacent to fragile properties presents similar scale-driven risks.

Relevance: Shows large urban infill projects can exceed exemption scope.

5. Save Our Schools v. Barstow Unified School District

(2015) 240 Cal.App.4th 128 — **Appellants prevailed**

Holding: Agency failed to support exemption with evidence on environmental impacts (student capacity, facilities).

Why it applies: City provided no evidence on groundwater hazards, traffic/EMT access, or construction-phase impacts.

Relevance: Supports argument that absence of supporting evidence bars exemption.

6. McQueen v. Board of Directors

(1988) 202 Cal.App.3d 1136 — **Appellants prevailed**

Holding: CEQA requires an accurate, stable, and finite project description; omission of material facts (contamination) invalidated exemption.

Why it applies: Omission of known high water table risks, prior excavation damage, and adjacency to Shalom Gardens senior care facility are material to environmental review.

Relevance: Demonstrates failure to disclose key facts undermines exemption.

Summary of Relevance:

These cases establish that a Class 32 exemption fails where:

- **Not all relevant General Plan policies are addressed** (*United Neighborhoods*).
- **Unusual circumstances or cumulative impacts exist** (*Berkeley Hillside*).
- **Boilerplate mitigation is used in place of evidence** (*West Adams*).
- **Scale and context create reasonable possibility of impacts** (*Saint Ignatius*).
- **The record lacks project-specific impact analysis** (*Save Our Schools*).
- **Material environmental facts are omitted** (*McQueen*).

Exhibit C – Facts → CEQA Criteria → Supporting Case Law

Fact / Evidence	Relevant CEQA Criteria	Supporting Case Law (Appellants Prevailed)
High groundwater table at site; documented structural cracking & settlement at 715 N. Harper after nearby excavation.	§15300.2(c) Unusual Circumstances – Risk of significant geologic/hydrologic impacts from large-scale excavation.	<i>Berkeley Hillside Preservation v. City of Berkeley</i> (2015) 60 Cal.4th 1086 – Fair argument standard applies when unusual site conditions create possible impacts.
Two subterranean parking levels requiring ~20,194 cubic yards soil export.	Appendix G (Geology/Soils; Hydrology/Water Quality) – Dewatering and soil movement can cause off-site damage.	<i>McQueen v. Board of Directors</i> (1988) 202 Cal.App.3d 1136 – Omission of key environmental hazard facts invalidates exemption.
Harper Avenue pinch point – Illegal red-zone parking blocks two-way traffic; project adds driveway here.	Appendix G (Transportation) – Emergency access interference is a significant effect; §15332(d) “no significant effects” fails.	<i>United Neighborhoods</i> (2023) 93 Cal.App.5th 1074 – Must address Mobility Element policies for emergency access.
Senior care facility (Shalom Gardens) at 745 N. Harper adjacent to site.	Sensitive receptors – Noise & air quality protections in General Plan’s Noise and Air Quality Elements.	<i>West Adams Heritage Assn. v. City of Los Angeles</i> (2024) – Cannot rely on boilerplate; need project-specific noise/air analysis.
Single-pane 1925 home – Cannot block construction dust, diesel fumes, or noise.	Appendix G (Air Quality; Noise) – Potentially significant short-term impacts.	<i>West Adams</i> (2024) – Absence of quantified noise/air data invalidates exemption.
Multiple recent mid-rise projects in Melrose/Harper area.	§15300.2(b) Cumulative Impacts – Must analyze combined effects of similar projects.	<i>Saint Ignatius Neighborhood Assn.</i> (2022) 85 Cal.App.5th 1063 – Large urban projects can exceed exemption scope.
LOD ignores Safety, Mobility, Noise, Air Quality, Housing Element policies in General Plan.	§15332(a) General Plan Consistency – Must show evidence for all relevant policies.	<i>United Neighborhoods</i> (2023) – Requires policy-by-policy evidence; omission invalidates exemption.
No hydrology, geotechnical, traffic, or air quality studies in record.	§15332(d) – Requires substantial evidence for “no significant effects.”	<i>Save Our Schools v. Barstow USD</i> (2015) 240 Cal.App.4th 128 – Lack of evidence on impacts invalidates exemption.