

SUPPLEMENTAL ANALYSIS

Case No. ENV-2023-2927-CE

Project Location: 23139 & 23141 West Collins Street
Parent Case No(s). AA-2023-2925-PMLA-HCA; ZA-2023-2926-ZAA-HCA

Project Description

The project is for the subdivision of one existing lot into two lots on a site that totals 35,913 (gross) square feet. The subject site is currently developed with an existing single-family dwelling, a patio, and six-foot-high wooden gates, all of which are proposed for demolition as shown on the applicant's preliminary parcel map stamp dated June 8, 2023. The proposed project involves the subdivision of the existing 35,913 lot into two single family lots, Parcel A with a lot area of 17,600 square feet and Parcel B with a lot area of 18,313 square feet. No square footage or building height is provided for the existing structures or proposed construction. However, the applicant submitted plans stamped by LADBS Plan Check on February 5, 2024, that shows the applicant is proposing to construct a 5,013 square foot, two-story single family dwelling with a maximum height of 25 feet and six inches on Parcel A. Additionally, Parcel A will include covered patios, 310 square foot trellis, 196 square foot recreation room, 680 square foot Junior Accessory Dwelling Unit (JADU), and pool. Both the stamped plans and preliminary parcel map show Parcel B to remain vacant. The subject site also contains three protected trees – one Southern California Black Walnut, one Valley Oak, and one California Western Sycamore – as well as nine mature, significant trees as identified in the Arborist Report prepared by Kay J. Greeley, dated October 18, 2023. According to the report, one mature Orange tree is proposed for removal, and six additional mature trees along with one protected California Western Sycamore tree located along the proposed rear property line of Parcel A will experience encroachment into their protected zones to accommodate construction on Parcel A. As conditioned herein the one non-protected tree on site that is subject to removal shall be replaced at a 1:1 ratio with a 24-inch box size tree. Any protected trees on-site or within the public right-of-way that are removed or replaced will be subject to review and approval of Urban Forestry.

To achieve the proposed project, the applicant is requesting a Zoning Administrator's Adjustment for a reduced midpoint (lot width) for Parcel B to allow for a flag lot configuration where a portion of the lot has a width of 20 feet in lieu of 70 feet as otherwise required under the RA Zone pursuant to LAMC Section 12.07 C.4.

Notice of Exemption

The City of Los Angeles determined based on the whole of the administrative record, that the Zone Change and subdivision entitlements are exempt from CEQA pursuant to CEQA Guidelines Section 15332, Class 32. For both entitlements, there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies. Specifically, the project was found to be exempt based on the following:

- CEQA Guidelines, Section 15332, Class 32, consists of projects characterized as in-fill development meeting the following five conditions: (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. These conditions are met as follows for the small lot subdivision project:

- (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 Land Use Element of the General Plan consists of the 34 Community Plans within the City of Los Angeles. The Community Plans establish goals, objectives, and policies for future developments at a neighborhood level. Additionally, through the Land Use Map, the Community Plan designates parcels with a land use designation and zone. The Land Use Element is further implemented through the Los Angeles Municipal Code (LAMC). The zoning regulations contained within the LAMC regulates, but is not limited to, the maximum permitted density, height, parking, and the subdivision of land.

The subdivision of land is regulated pursuant to Article 7 of the LAMC. Pursuant to LAMC Section 17.50, parcel maps are to be designed in conformance with the parcel map regulations to ensure compliance with the various elements of the General Plan, including the Zoning Code. Additionally, the maps are to be designed in conformance with the Street Standards established pursuant to LAMC Section 17.05 B. The project site is located within the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan, which designates the site with a Very Low Residential land use designation. The land use designation lists the RE20, RA, RE15, and RE11 Zone as the corresponding zones. The Project Site is zoned RA-1, which is consistent with the land use designation. The project site has approximately 35,913 (gross) square feet of lot area, which would permit a maximum of one dwelling unit (one unit/per 17,500 square feet) as requested if sufficient lot area is available after Code required dedications and improvements are made. The applicant's preliminary parcel map stamp dated June 8, 2023 does not show Code required dedications and improvements which are conditioned herein.

Parcel Map No. 2025-2925-PMLA-HCA was filed concurrently with Incidental Case No. ZA-2025-2926-ZAA-HCA. The related case requests an Adjustment to permit a minimum midpoint lot width of 20 feet in lieu of the 70 feet otherwise required pursuant to LAMC Section 12.07.C.4. The reduced lot width would accommodate

a flag lot configuration, a layout that is commonly approved in subdivision cases where feasible access and development standards can be maintained. Although flag lot configurations have been denied on nearby properties in the past, the City's policy direction has evolved to address the urgent need for housing.

The proposed Adjustment supports the goals and objectives outlined in the 2021–2029 Housing Element, particularly in promoting infill development, expanding housing opportunities on underutilized sites, and removing barriers to housing production. The Housing Element goals, objectives, and policies are not mandatory and the Housing Element recognizes that not all policies can be met in any given actions. Specifically, the Housing Element provides the following:

Not all plan policies can be achieved in any single action, and, in relation to any decision, some goals may be more compelling than others. On a program-by-program basis, taking into consideration factual circumstances, decision makers will determine how best to implement the adopted policies of the General Plan in any way which best serves the public health, safety, and general welfare. (p. 243.)

Finally, the Project site is not located in the Housing Element inventory of sites or rezoning sites for production of affordable housing. Therefore, the Project site is not inconsistent with any of the 2021-2029 Housing Element goals, objectives, or policies related to the production of affordable housing.

Additionally, the project aligns with the General Plan Framework Element, which encourages a more efficient use of land and supports new housing in existing residential neighborhoods when compatible with surrounding uses. Given these considerations, the proposed lot configuration and associated Adjustment are consistent with Citywide policies that prioritize housing development and land use efficiency.

- (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 is wholly within the City of Los Angeles, on a site that is approximately 0.8 acres, and is substantially surrounded by urban uses. The surrounding area is a developed urban area of single-family residential uses. The properties to the north, east, west and south are zoned RA-1 with a land use designation of Very Low Residential and are improved with single family dwelling units. Further northwest of the subject site, located at 23231 West Hatteras Street is zoned [Q]PF-1XL with a land use designation of Public Facilities and developed with an elementary school and associated parking (Woodlake Avenue Elementary School). The surrounding area near the subject site is primarily developed with one- and two-story single-family residences characterized by larger lots, generous front and rear yards, and U-shaped driveways contribute to the suburban residential character.

- (c) *The project site has no value as habitat for endangered, rare or threatened species.*

The project site is located within an established, fully developed, residential neighborhood. The subject site also contains three protected trees – one Southern California Black Walnut, one Valley Oak, and one California Western Sycamore – as well as nine mature, significant trees as identified in the Arborist Report prepared by Kay J. Greeley, dated October 18, 2023. According to the report, one mature Orange tree is proposed for removal, and six additional mature trees along with one protected California Western Sycamore tree located along the proposed rear property line of Parcel A will experience encroachment into their protected zones to accommodate construction on Parcel A. As conditioned herein the one non-protected tree on site that is subject to removal shall be replaced at a 1:1 ratio with a 24-inch box size tree. No street tree or protected tree may be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. Additionally, the project is located on a site that has been previously disturbed and is surrounded by a dense single family residential neighborhood. According to the Department of City Planning's Zoning Information and Map Access (ZIMAS) geographic information system website (www.zimas.lacity.org), the property does not contain the potential for significant biological resources, mountain lion habitat, or monarch butterfly habitat; is not within a 300-foot habitat buffer zone, a County-designated Significant Ecological Areas or Coastal Resource Areas, or a USFWS-designated Critical Habitat Area; and is not part of a Wildland Urban Interface or a Criterion 1 Protected Area for Wildlife (PAW). Therefore, 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.*

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles noise, 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, the project does not exceed the threshold criteria established by LADOT for preparing a transportation study. Interim thresholds were developed by DCP staff based on CalEEMod model 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.

These RCMs will ensure there are no significant impacts related to traffic, air quality, noise, and water quality.

- (e) *The site can be adequately served by all required utilities and public services.*

The project site will be adequately served by all public utilities and services given that the construction will be on a site which has been previously developed and is consistent with the General Plan. Therefore, the project meets all of the Criteria for the Class 32.

CEQA SECTION 15300.2: EXCEPTIONS TO THE USE OF CATEGORICAL EXEMPTIONS

The City has further considered whether the proposed project is subject to any of the six exceptions (listed as a-f) set forth in State CEQA Guidelines Section 15300.2, that would prohibit the use of any categorical exemption. None of the exceptions are triggered for the reasons discussed as follows:

- 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 effect on the environment may in a particularly sensitive environment be significant. Therefore, these classes may not be utilized 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.*

Not applicable as this project relies upon a Class 32 Categorical Exemption as discussed above.

- B. **Cumulative Impacts.** *The exception applies when, although a particular project may not have a significant impact, the impact of successive projects, of the same type, in the same place, over time is significant.*

Based on a review of databases including the City of Los Angeles Department of City Planning ZIMAS for nearby case approvals (<http://zimas.lacity.org/>), the Los Angeles Department of Building and Safety (LADBS) for recently issued permits, and Navigate LA for other entitlements requested on property in the surrounding area, there are no active projects in the vicinity, and as such, the cumulative impact of successive projects of the same type in the same place, over time, would not be significant.

- C. **Unusual Circumstances.** *This exception applies when, although the project may otherwise be exempt, there is a reasonable possibility that the project will have a significant effect due to unusual circumstances.*

Subdivision projects, of similar size, is a common form of infill development type citywide and this proposed project presents no unusual circumstances because the surrounding area is developed heavily with single family residential uses. The proposed height and two-story construction are not unusual for the vicinity of subject site and are similar in scope to other existing Very Low Residential uses as the surrounding residences vary from one to two stories in height. The project site is located within a geographic area designated as ZI-2438 – Equine Keeping in the City of Los Angeles. ZI-2438 regulates distances between habitable rooms and horse keeping uses. No horse keeping was

observed at the subject site or on neighboring properties, and compliance with horse keeping regulations will be reviewed by LADBS during Plan Check. Additionally, the site is located within the area subject to the Modifications to Single-Family Zones and Single-Family Zone Hillside Area Regulations (ZI-2462); however, according to the Department of Building and Safety, Zoning, the project does not require any grading or construction of engineered retaining structures to mitigate potential geologic hazards. The project site is located within the 12 kilometers (approximately 7.4 miles) from the Malibu Coast Fault, but is not located within the Alquist-Priolo Fault Zone. The site is not located within a designated Hillside Area but is located within the Bureau of Engineering's Special Grading Area and Liquefaction area; the project does not propose any grading and shall be subject to the review and satisfaction of the Department of Building and Safety, Grading Division, for compliance with all applicable requirements prior to recordation of the final map and issuance of any permits. Further, the project was issued a Geology and Soils Report Approval dated May 22, 2023, Log No. 125898 and attached to the case file for Parcel Map No. 2023-2925-PMLA. The conditions in that approval are by reference incorporated herein. The site is not located within a high fire hazard severity zone, flood zone, landslide, methane, or tsunami inundation zone. The site is not identified as having hazardous waste or past remediation. The site is within Flood Zone X, which denotes areas determined to be outside the 0.2% annual chance floodplain. The site is not subject to the Specific Plan for the Management of Flood Hazards (floodways, floodplains, mud prone areas, coastal high-hazard and flood-related erosion hazard areas).

Therefore, the project will not have a significant effect due to unusual circumstances.

- D. **State Scenic Highway.** *This exception applies when, although the project may otherwise be exempt, there may be 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.*

Based on a review of the California Scenic Highway Mapping System (http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/), the subject site is not located along a State Scenic Highway, nor are there any designated State Scenic Highways located near the project site. Based on this, the proposed project will not result in damage to scenic resources including 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.** *Projects located on a site or facility listed pursuant to California Government Code 65962.5.*

Based on a review of the California Department of Toxic Substances Control "Envirostor Database" (<http://www.envirostor.dtsc.ca.gov/public/>), no known hazardous waste sites are located on or proximate to the project site. In addition, there is no evidence of historic or current use, or disposal of hazardous or toxic materials at this location. Based on this,

the project will not result in a significant effect due hazardous waste and this exception does not apply.

F. Historical Resource. *Projects that 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, or the Los Angeles Historic-Cultural Monuments Register, and/or any local register according to the City's HistoricPlacesLA website. The project will not cause a substantial adverse change in the significance of a historical resource.

In conclusion, since the project meets all of the requirements of the categorical exemption set forth at CEQA Guidelines, Section 15332 and none of the applicable exceptions to the use of the exemption under Section 15300.2 apply to the project, it is appropriate to determine this project is categorically exempt from the requirements of CEQA.