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JUSTIFICATION FOR PROJECT EXEMPTION CASE NO. ENV-2024-6712-CE

The Department of City Planning has determined that the has determined that the California Environmental Quality Act (CEQA) of 1970 and the State CEQA Guidelines designate the subject project as Categorically Exempt under Article 19, Section 15303, Class 3 (new construction) and Section 15332, Class 32 (in-fill). This project is located at 2166 Stanley Hills Drive and 2172 Stanley Hills Drive.

The subject site is zoned R1-1-HCR, designated for Low II Residential land uses, and is located within the Hollywood Community Plan area. The proposed project consists of the construction of two new single-family dwellings, each with attached garages, swimming pools, spas and two retaining walls up to ten feet in height. The project located at 2166 Stanley Hills Drive will be 2,091 square feet in size with a proposed height of 28 feet. Site grading for this property will include 410 cubic yards of cut and 320 cubic yards of fill. The project located at 2172 Stanley Hills Drive will total 2,338 square feet with a proposed height of 28 feet. This property will include a rooftop deck. Site grading includes 437 cubic yards of cut and 322 cubic yards of fill. The subject site totals approximately 0.26 acres.

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.

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.*

The subject property is within the Laurel Canyon/Bird Streets Hillside Construction Regulation District (HCR) Supplemental Use District, Special Grading Area (BOE Basic Grid Map A-13372), Urban Agriculture Incentive Zone, Very High Fire Hazard Severity Zone, Santa Monica Mountains Zone, Landslide area and is located within the Hollywood Fault Zone. However, 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. Specifically, the following RCMs would apply:

- **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.
- **Regulatory Compliance Measure RC-GEO-3 (Landslide Area):** Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any landslide and soil displacement, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:
 - ground stabilization
 - selection of appropriate foundation type and depths
 - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.

The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter dated April 30, 2025 (Log # 132769), for the proposed project, and as it may be subsequently amended or modified.

- **Regulatory Compliance Measure RC-GEO-5 (Subsidence Area):** Prior to the issuance of building or grading permits, the applicant shall submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The geotechnical

report shall assess potential consequences of any subsidence and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations shall include but are not limited to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- **Regulatory Compliance Measure RC-GEO-6 (Expansive Soils Area):** Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil expansion and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations shall include but are not limited to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.
- **Regulatory Compliance Measure RC-AE-1 (Hillside): Compliance with Baseline Hillside Ordinance.** To ensure consistency with the Baseline Hillside Ordinance, the project shall comply with the City's Hillside Development Guidelines, including but not limited to setback requirements, residential floor area maximums, height limits, lot coverage and grading restrictions.
- **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 amounts 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-NOI-1 (Noise Ordinance):** The project shall conform with the City's noise regulations that have taken effect pursuant to Ordinance 144,331 et sequentia. These measures include but are not limited to LAMC Section 41.40 for Construction Noise, LAMC Section 113.01 for Rubbish and Garbage Collection, LAMC Section 114.0 for Vehicle loading or unloading (Deliveries), LAMC Section 112.01(c) for Noise Emitting.
- **Regulatory Compliance Measure RC-WQ-1: National Pollutant Discharge Elimination System General Permit.** Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for Phase 1 of the proposed Modified Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the proposed Modified Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.
- **Regulatory Compliance Measure RC-WQ-2: Dewatering.** If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior

to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.

- **Regulatory Compliance Measure RC-WQ-3: Low Impact Development Plan.** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.
- **Regulatory Compliance Measure RC-WQ-4: Development Best Management Practices.** The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

These RCMs have been historically proven to work to the satisfaction of the City Engineer to reduce any impacts from the specific environment in which the Project is located. In addition, roof and site drainage as well as sewer availability must comply with Bureau of Engineering and Bureau of Sanitation standards; and hydrants, Fire Department Access, and Fire Safety must be reviewed and approved by the Los Angeles Fire Department before permits can be issued. Furthermore, the project must comply with the Baseline Hill Ordinance No. 181, 624 adopted after May 9, 2011, Modifications to Single-Family Zones and Single-Family Zone Hillside Area Regulations ZI-2462 effective March 17, 2017. Thus, in conjunction with the above RCMs and compliance with other applicable regulations, the location of the Project's will not result in a significant impact based on its location.

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 would not result in a cumulatively considerable contribution to any impact. The threshold of significance for a cumulatively considerable contribution to a traffic impact is the same as the threshold of significance for a project impact. Therefore, since the project would not exceed that threshold, it would have neither a project-specific significant impact, nor the potential to result in a cumulatively considerable contribution to a significant traffic impact.

With regard to potential cumulative impacts during the construction phase of the project, there may be active construction activity in the vicinity of where the subject property is located at the same time that the project undergoes construction. However, Regulatory Compliance Measures will help ensure that cumulative impacts related to construction

activity are addressed. The subject project submitted a Construction Traffic Management Plan for review by the City's Department of Transportation (LADOT), pursuant to the LADOT's Hillside Development Construction Traffic Management Plan is to address transportation concerns specific to hillside communities, including narrow streets, limited emergency access, and location in a Very High Fire Severity Zone. The proposed project will be subject to the conditions detailed in the Project's Construction Traffic Management Plan, included in the case file, which was reviewed and stamped-approved by LADOT on June 23, 2025. The conditions imposed address any potential cumulative effects of various projects of the same type in the same area. Therefore, the subject project will have no cumulative impact on the City's circulation system.

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 site is previously disturbed and surrounded by development and therefore is not, and has no value as, a habitat for endangered, rare or threatened species. There are six protected trees on the site, Coast Live Oak as identified in the Tree Report prepared by McKinley & Associates on June 18, 2024. The project application does not propose to remove the six protected trees on-site and. However, as explained in the project description, the applicant will be required to improve the right-of-way. Prior to any work on the right-of-way, the applicant will be required to obtain approved plans from the Department of Public Works. Note, 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. At the time of preparation of this CE, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. Thus, there are no unusual circumstances which may lead to a significant effect on the environment, and this exception does not apply.

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. Furthermore, the building permit history for the Project Site does not indicate the Site may be hazardous or otherwise contaminated and this exception does not apply.

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. Finally, 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.

CEQA Determination – Class 3 Categorical Exemption Applies

Class 3 consists of 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 structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. The proposed project qualifies for the Class 3 Categorical Exemption because it involves the construction, maintenance and use of two single-family dwellings (2,091 square feet in and 2,338 square feet in size respectively).

CEQA Determination – Class 32 Categorical Exemption Applies

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the conditions as follows: (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 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; and (e) The site can be adequately served by all required utilities and public services.

(a) The project is consistent with applicable general plan designation, applicable policies, and applicable zoning designations.

This project is located at 2166 Stanley Hills Drive and 2172 Stanley Hills Drive. The subject site is zoned R1-1-HCR, designated for Low II Residential land uses, and is located within the Hollywood Community Plan area. The subject property is within the Laurel Canyon/Bird Streets Hillside Construction Regulation District (HCR) Supplemental Use District, Special Grading Area (BOE Basic Grid Map A-13372), Urban Agriculture Incentive Zone, Very High Fire Hazard Severity Zone, Santa Monica Mountains Zone, Landslide area and is located within the Hollywood Fault Zone. The proposed two single-family dwellings are in conformance with the applicable Hollywood Community Plan designation and policies and all applicable zoning designations and regulations. Single-family dwellings are a permitted use in the R1-1 Zone and is in conformance with the type of development permitted by the Community Plan.

The project addresses the following objectives of the Community Plan:

- LU1.1: Neighborhood character. Maintain the distinguishing characteristics of Hollywood's residential neighborhoods with respect to lot size, topography, housing scale and landscaping, to protect the character of existing stable neighborhoods from new, out-of-scale development.

LU1.2: Adequate housing and services. Provide housing that accommodates households of all sizes, as well as integrates safe and convenient access to schools, parks, and other amenities and services.

LU 2.1: Preserve neighborhood scale. Preserve stable single-family zoned residential neighborhoods by preventing out of scale development. Ensure that new single-family construction is compatible with the scale and character of existing residential neighborhoods.

By developing the subject property, the proposed project will add two new housing units in the City and enhance the existing residential neighborhood by improving a vacant site with single-family residences similar in scale to other houses in the neighborhood. Moreover, the project will meet the aforementioned objectives noted above by creating housing that will preserve the low-density residential character of the surrounding area.

(b) The proposed development occurs within city limits on a project site 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 0.26 acres. Lots adjacent to the subject site are developed with the following urban uses: single-family dwellings.

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

The site is previously disturbed and surrounded by development and therefore is not, and has no value as, a habitat for endangered, rare or threatened species. There are six protected trees on the site, Coast Live Oak as identified in the Tree Report prepared by McKinley & Associates on June 18, 2024. The project application does not propose to remove the six protected trees on-site and. However, as explained in the project description, the applicant will be required to improve the right-of-way. Prior to any work on the right-of-way, the applicant will be required to obtain approved plans from the Department of Public Works. Note, 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. At the time of preparation of this CE, no approvals have been given for any tree removals on-site or in the right-of-way by BPW.

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality

As previously mentioned, the projects will be subject to Regulatory Compliance Measures (RCMs). These require compliance with the City of Los Angeles: Noise Ordinance; National Pollutant Discharge Elimination System General Permit; Dewatering; Low Impact Development Plan; Stormwater Mitigations; and Best Management Practices for stormwater runoff. These RCMs will reduce any potential impacts on noise and water to less than significant. Furthermore, the projects do not exceed the threshold criteria

established by LADOT for preparing a traffic study. The projects will also be governed by an approved haul route under City Code requirements, which will regulate the route hauling trucks will travel, and the times at which they may leave the site, thereby reducing any potential traffic impacts to less than significant. 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.

- (e) *The proposed project has been reviewed by City staff and 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 of two single-family dwellings 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.