

COUNTY CLERK'S USE

CITY OF LOS ANGELES

CITY CLERK'S USE

OFFICE OF THE CITY CLERK
200 NORTH SPRING STREET, ROOM 360
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(California Environmental Quality Act Section 15062)

Filing of this form is optional. If filed, the form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152 (b). Pursuant to Public Resources Code Section 21167 (d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitations being extended to 180 days.

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| LEAD CITY AGENCY City of Los Angeles Department of City Planning | COUNCIL DISTRICT 5 - Koretz |
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| PROJECT TITLE Motor Apartments (DIR-2016-4880-DB) | LOG REFERENCE ENV-2016-4881-CE |
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PROJECT LOCATION
3558-3570 South Motor Avenue, 10313 West Tabor Street, Los Angeles, CA 90034

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The proposed Project is for the demolition of an existing one-story, three-unit, 6,768 square-foot commercial building, and the construction, operation, and maintenance of a new six-story, 42-unit, mixed-use development containing 38 market rate units, 4 Very Low Income units, and 1,770 square feet of ground-floor retail. The Project proposes five residential levels over one level of at-grade parking and commercial uses, and one level of subterranean parking, with a total of 54 parking spaces. The building measures 72 feet and 7 inches in height (as measured from average grade to the top of the parapet). Two non-protected trees will be removed. The project also involves a haul route for the export of 6,000 cubic yards of dirt.

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT, IF OTHER THAN LEAD CITY AGENCY:
3568 Motor, LLC (Dana Sayles, Three6ixty)

| | | | |
|--------------------------------|------------------|------------------------------|----------|
| CONTACT PERSON Connie Chauv | AREA CODE 213 | TELEPHONE NUMBER 978-0016 | EXT. |
|--------------------------------|------------------|------------------------------|----------|

EXEMPT STATUS: (Check One)


| | STATE CEQA GUIDELINES | CITY CEQA GUIDELINES |
|---|---------------------------|----------------------------|
| MINISTERIAL | Sec. 15268 | Art. II, Sec. 2b |
| DECLARED EMERGENCY | Sec. 15269 | Art. II, Sec. 2a (1) |
| EMERGENCY PROJECT | Sec. 15269 (b) & (c) | Art. II, Sec. 2a (2) & (3) |
| <input checked="" type="checkbox"/> CATEGORICAL EXEMPTION | Sec. 15300 <i>et seq.</i> | Art. III, Sec. 1 |

Class 4 Category 1 (City CEQA Guidelines)
Class 32 Category N/A (State CEQA Guidelines)

OTHER (See Public Resources Code Sec. 21080 (b) and set forth state and City guideline provision.)

JUSTIFICATION FOR PROJECT EXEMPTION:
Class 4 Category 1: Grading on land with a slope of less than ten percent (10%), except where it is to be located in a waterway, in any wetland, in an officially designated (by federal, State, or local governmental action) scenic area or in an officially mapped areas of severe geologic hazard.
Class 32: In-fill development meeting the conditions described in this section. (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. (e) The site can be adequately served by all required utilities and public services.

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

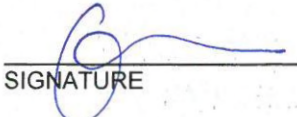
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|--|----------------------------------|--------------------------|
| SIGNATURE  | TITLE City Planning Associate | DATE 09/01/17 |
| FEE: \$ 2,280 | RECEIPT NO. 0101673268 | REC'D. BY Eric Claros |
| | | DATE 12/21/2016 |

DISTRIBUTION: (1) County Clerk, (2) City Clerk, (3) Agency Record
Rev. 11-1-03 Rev. 1-31-06 Word

IF FILED BY THE APPLICANT:


Dana Sayles
NAME (PRINTED)

9/21/17
DATE


SIGNATURE

I hereby verify and attest this to be a true and correct copy of the official record on file in the office of the Department of City Planning of the City of Los Angeles

designated as CITY PLANNING ASSOCIATE

 WINNIE CHAN
Department Representative

09/01/17

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**DEPARTMENT OF
CITY PLANNING**

CITY PLANNING COMMISSION

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RENEE DAKE WILSON
VICE-PRESIDENT

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CITY OF LOS ANGELES
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<http://planning.lacity.org>

**JUSTIFICATION FOR PROJECT EXEMPTION
CASE NO. ENV-2016-4881-CE**

On September 1, 2017, the Planning Department determined that the City of Los Angeles Guidelines for the implementation of the California Environmental Quality Act of 1970 and the State CEQA Guidelines designate the subject project as Categorically Exempt under State CEQA Guidelines Article 19, Sections 15304 and 15332, and City CEQA Guidelines Article III, Section 1, Class 4 Category 1, Case No. ENV-2016-4881-CE.

The project is for the demolition of an existing one-story, three-unit, 6,768 square-foot commercial building, and the construction, operation, and maintenance of a new six-story, 42-unit, mixed-use development containing 38 market rate units, 4 Very Low Income units, and 1,770 square feet of ground-floor retail. The Project proposes five residential levels over one level of at-grade parking and commercial uses, and one level of subterranean parking, with a total of 54 parking spaces. The building measures 72 feet and 7 inches in height (as measured from average grade to the top of the parapet). Two non-protected trees will be removed. The project also involves a haul route for the export of 6,000 cubic yards of dirt. As a mixed-use development, and a project which is characterized as in-fill development, the project qualifies for the Class 4, Category 1 and Class 32 Categorical Exemption(s).

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 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 project is consistent with the following Elements of the General Plan: Framework Element, Land Use Element (Palms – Mar Vista – Del Rey Community Plan), Housing Element, and the Mobility Element.

Framework Element: The Citywide General Plan Framework is a guide for communities to implement growth and development policies by providing a comprehensive long-range view of the City as a whole. The Framework establishes categories of land use that are broadly described by ranges of intensity/density, heights, and lists of typical uses. The Framework Element's land use designation of General Commercial has corresponding zones of C2 and [Q]C2. The subject site is designated for General Commercial land uses and zoned C2-1; therefore, the subject site is consistent with the Framework Element.

Land Use Element (Palms – Mar Vista – Del Rey Community Plan): The subject site is located within the Palms – Mar Vista – Del Rey Community Plan (“Community Plan”). The Community Plan designates the site for General Commercial land uses, which has corresponding zones of C1.5, C2, C4, RAS3, and RAS4. The subject site is zoned C2-1, and is therefore consistent with the Community Plan’s land use designation. The C2-1 zoning of the subject site allows for residential uses at R4 density, unlimited building height and a maximum Floor Area Ratio (FAR) of 1.5:1. The subject site has a lot area of approximately 14,997 square feet, which allows a by-right density 38 residential units in conjunction with LAMC Sections 12.14 A.1(a), 12.13.5 A.1, and 12.11, and up to a maximum of 52 residential units through the Density Bonus pursuant to LAMC Section 12.22 A.25 and Assembly Bill (AB) 2501. The proposed Project is for the construction of new six-story 42-unit mixed-use development containing 1,770 square feet of ground-floor retail and measuring 72 feet and 7 inches in height. The proposed uses, density, and height are allowed by the Community Plan’s land use designation in combination with the site’s zoning in combination with state Density Bonus law.

Housing Element: The Housing Element indicates that not only are more housing units needed to accommodate the City’s growth, but that these units need to be a broader array of typologies to meet evolving household types and sizes. In addition, the Housing Element includes an Inventory of Sites for Housing (Housing Element Exhibit H) that identifies parcels suitable for additional residential development without the need for any discretionary zoning action by the City. The site’s Assessor Parcel Number (APN # 4314014002) has been identified in the Inventory, and is therefore meeting Housing Element provisions of providing housing on these applicable sites. As mentioned, the proposed Project will demolish an existing commercial building and construct 42 new residential units. The proposed Project will therefore provide a net increase of 42 residential units within close proximity to jobs, transit, and other amenities including an elementary school. Pursuant to Density Bonus requirements, 4 of the total units will be reserved for Very Low Income households, and is therefore achieving the Housing Element goal of providing affordable units and promoting mixed-income developments.

Mobility Element: The Mobility Element sets forth objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility within the City of Los Angeles. The subject site is located at the intersection of Motor Avenue and Tabor Street, and is served by a variety of transit options including the Metro Expo Line (806) Palms Station, which is located approximately 0.3 miles from the subject site, as well as by local and regional bus lines operated by Culver City Bus, Big Blue Bus, Los Angeles Metro, and LADOT. Specifically, the subject site is within 1,500 feet of Transit Stops served by Culver City Bus Line 3 and Big Blue Bus Lines 17 and Rapid 12; and the subject site is within 0.5 miles from Transit Stops served by Metro Bus Lines 33 and 733, Big Blue Bus Line 5, and LADOT Line Commuter Express Line 431. The proposed Project will allow for a reduction of vehicle trips by placing high-density residential within proximity to public transit, as well as existing retail and amenities along Motor Avenue and the greater Palms neighborhood. Furthermore, the location of ground floor commercial uses and residential lobby will facilitate a pedestrian-oriented environment by providing transparency at the street level, thereby activating the streets. The project also involves the dedication of 3 feet along Motor Avenue and 5 feet along Tabor Street; therefore the building wall will be set back further from the street and allow for wider sidewalks to facilitate pedestrian activity. The proposed Project will also provide bicycle parking spaces in accordance with the Bicycle Parking Ordinance and LAMC Section 12.21 A.16 for residents and visitors, thereby facilitating bicycle ridership.

The subject site is also located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan. The West Los Angeles Transportation Improvement and Mitigation Specific Plan does not address development issues. It identifies trip fee requirements for non-residential projects.

Consistent with the Palms – Mar Vista – Del Rey Community Plan and General Plan, the proposed 42-unit mixed-use development adds new mixed-income multi-family housing to Los Angeles' housing supply in a neighborhood which is conveniently located to a variety of community services including transit stops. The project meets parking, yard, open space, and landscaping requirements, with modifications to allow additional FAR, and reduced parking through the Density Bonus Ordinance. Therefore, 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.

The subject site is located in close at the intersection of Motor Avenue and Tabor Street in the Palms neighborhood. The development consists of a mixed-use project on a lot that is approximately 14,997 square feet (0.344 acres) in size, and is wholly within the City of Los Angeles.

The subject site is substantially surrounded by urban uses in close proximity to major arterials including Motor Avenue to the west and Palms Boulevard to the north. Lots adjacent to the subject site are zoned R3-1, C2-1, and [Q]PF-1XL, and are developed with low- to mid-rise multi-family and commercial uses. Neighboring lots to the east (across the alley) are zoned R3-1 and developed with multi-family uses. The lot to the north (across the alley) is zoned [Q]PF-1XL and developed with an elementary school. The subject site is also served by a variety of transit options including the Metro Expo Line (806) Palms Station, which is located approximately 0.3 miles from the subject site, as well as by local and regional bus lines operated by the Culver City Bus, Big Blue Bus, Los Angeles Metro, and LADOT. Therefore, it can be found that 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.

The subject site is located within an established area that is fully-developed with a commercial corridor with low- to medium-density multi-family and commercial uses. The site is previously disturbed and surrounded by development. There are no protected trees on the site. The project does not involve the removal of healthy, mature, scenic trees because the trees being removed (palm) are not protected trees. Therefore, the 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.

The proposed project replaces an existing one-story commercial building, adding 42 new housing units and 1,770 square feet of ground-floor commercial to the subject site.

Based upon the existing mobility and circulation networks in direct proximity to the proposed project, the introduction of 42 additional units to the community will result in no traffic impacts. The traffic impact analysis, prepared by Overland Traffic Consultants, Inc. dated May 1, 2017, concluded the Project will result in net project trip generation of 179 daily trips with thirty (30) a.m. peak hour trips and two (2) p.m. peak hour trips. The traffic impact analysis also indicated there will be no significant traffic impacts at the intersection of Motor Avenue and Palms Boulevard, at the intersection of Motor Avenue and Tabor Avenue, and at the driveway off of Linwood Avenue. The traffic impact analysis was reviewed by the Los Angeles Department of Transportation (LADOT). In a memo dated May 30, 2017, LADOT determined that the analysis

adequately describes the project-related impact of the proposed development. Therefore, the project will not have any significant impacts to traffic.

The Department of Building and Safety will require a haul route for the export of 6,000 cubic yards of soil in a Special Grading Area. Regulatory Compliance Measures (RCMs) include the submittal of a Geology and Soils Report to the Department of Building and Safety (DBS), and compliance with a Geology and Soils Report Approval Letter, issued by DBS on March 8, 2017 (LOG # 96213-01), which details conditions of approval that must be followed. In addition, the RCMs require that design and construction of the building must conform to the California Building Code, and grading on site shall comply with the City's Landform Grading Manual, as approved by the Department of Building and Safety Grading Division. According to Navigate LA, within 500 feet of the subject site, there is one other haul route application in conjunction with the construction of a new 5-story, 49-unit apartment building over 1 level of subterranean parking, located at 3628-3642 South Motor Avenue, which is currently pending. In light of the increase in construction activity in Grading Hillside Areas and the increase in associated truck traffic related to the import and export of soil, a haul route monitoring program is being implemented by the Department of Building and Safety for Council Districts 4 and 5 for added enforcement to ensure safety and to protect the quality of life of area residents. As part of this program, a haul route monitor is assigned to a geographic area to monitor haul routes and keep track of daily activities in order to minimize impacts to neighboring residents. Haul routes are tracked via a Map for each district to identify the locations of construction sites for which a haul route was required. The haul route approval will include RCMs and recommended conditions prepared by LADOT to be considered by the Board of Building and Safety Commissioners to reduce the impacts of construction related hauling activity, monitor the traffic effects of hauling, and reduce haul trips in response to congestion. Therefore, no foreseeable cumulative impacts are expected

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. The project must comply with the adopted City of Los Angeles Noise Ordinances Nos. 144,331 and 161,574, as well as any subsequent Ordinances, which prohibit the emission or creation of noise beyond certain levels. These Ordinances cover both operational noise levels (i.e., post-construction), and any construction noise impacts. These RCMs will ensure the project will not have significant impacts on noise and water. As a result of this mandatory compliance, the proposed project will not result in any significant impacts on noise or water.

The building construction phase includes the construction of the proposed building on the subject property, which grading and a haul-route for the importing/exporting of approximately 6,000 cubic yards of dirt, connection of utilities, laying irrigation for landscaping, architectural coatings, paving, and landscaping the subject property. These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and foundation preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would result primarily in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

Nevertheless, appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specifically, Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing

system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas.

Best Management Practices (BMP) will be implemented that would include (but not be limited to) the following:

- Unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce emissions and meets SCAQMD Rule 403;
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust;
- General contractors shall maintain and operate construction equipment to minimize exhaust emissions; and
- Trucks shall not idle but be turned off.

The project, a 29,782-square foot mixed-use building will replace an approximately 6,768-square foot existing commercial building. The project will not result in significant impacts related to air quality because it falls below interim air threshold established by DCP staff. 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. Possible project-related air quality concerns will derive from the mobile source emissions generated from the proposed residential uses for the project site. Operational emissions for project-related traffic will be less than significant. In addition to mobile sources from vehicles, general development causes smaller amounts of "area source" air pollution to be generated from on-site energy consumption (natural gas combustion) and from off-site electrical generation. These sources represent a small percentage of the total pollutants. The inclusion of such emissions adds negligibly to the total significant project-related emissions burden generated by the proposed project. The proposed project will not cause the SCAQMD's recommended threshold levels to be exceeded. Operational emission impacts will be at a less-than-significant level.

The development of the project would not result in any significant effects relating to water quality. The project is not adjacent to any water sources and construction of the project will not create any impact to water quality. The project will be subject to Regulatory Compliance Measures (RCMs) for pollutant discharge, dewatering, stormwater mitigations, and Best Management Practices for stormwater runoff. Furthermore, the project will comply with the City's stormwater management provisions per LAMC 64.70.

The subject property has a slope of less than 10 percent and is not in a waterway, wetland, or officially designated scenic area. Therefore, there is no substantial evidence that the proposed project will have a specific adverse impact on the physical environment.

Furthermore, the subject site is located within a Transit Priority Area (TPA) as defined by Public Resources Code (PRC) Section 21099(a)(7) and Zoning Information (ZI) File 2452, due to its location within one-half mile of a major transit stop. Therefore, pursuant to SB 743 and PRC Section 21099 (d)(1), "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment". Therefore, the project's aesthetic impacts, such as visual resources, aesthetic character, shade and shadow, light and glare, shall not be considered a significant impact on the environment for CEQA purposes.

(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 of a mixed-use development will be on a site which has been previously developed and is consistent with the general plan. The site is currently and adequately served by the City's Department of Water and Power, the City's Bureau of Sanitation, the Southern California (SoCal) Gas Company, the Los Angeles Police Department, the Los Angeles Fire Department, Los Angeles Unified School District, Los Angeles Public Library, and other public services. These utilities and public services have continuously served the neighborhood for more than 50 years. In addition, the California Green Code requires new construction to meet stringent efficiency standards for both water and power, such as high-efficiency toilets, dual-flush water closets, minimum irrigation standards, LED lighting, etc. As a result of these new building codes, which are required of all projects, it can be anticipated that the proposed project will not create any impact on existing utilities and public services through the net addition of 42 dwelling units.

The project and its related haul route application can be characterized as in-fill development within urban areas for the purpose of qualifying for Class 32 Categorical Exemption as a result of meeting the five conditions listed above. Therefore, based on the facts herein, it can be found that the project meets the qualifications of the Class 32 Exemption.

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 (6) exceptions that would prohibit the use of any of a categorical exemption as set forth in State CEQA Guidelines Section 15300.2. None of the exceptions are triggered for the following reasons.

There are six (6) Exceptions which the City is required to consider before finding a project exempt under Class 15303 and 15332:

- 1) **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 is approximately 1.87 km from the Newport – Inglewood Fault Zone (onshore), specific Regulatory Compliance Measures 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 but are not limited to:

- **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-NO-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.

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. Thus, the location of the project will not result in a significant impact based on its location.

2) 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.*

There is not a succession of known projects of the same type and in the same place as the subject project. There is one site within a 500-foot radius from the subject site that is under construction. The site is at 3628-3642 Motor Avenue, which is located approximately 400 feet south of the subject site, approved per Case No. DIR-2016-1262-DB, with building permits (16010-10001-03000) pending and verifications in progress as of 2/15/2017.

While there could be potentially projects of similar type in the same place, a traffic impact analysis, prepared by Overland Traffic Consultants, Inc. dated May 1, 2017, conducts a “Future With Project conditions” analysis that adds Project traffic volumes to the “Future Without Project volumes” which adds “ambient growth of 1% per year as required by LADOT in traffic studies for this area and traffic volumes from other planned development in the area to the existing counts”. In a memo dated May 30, 2017, LADOT determined that the analysis adequately describes the project-related impact of the proposed development, and that neither of the two studied intersections would be significantly impacted by project-related traffic.

In addition, all projects 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. The haul route approval will include RCMs and recommended conditions prepared by LADOT to be considered by the Board of Building and Safety Commissioners to reduce the impacts of construction related hauling activity, monitor the traffic effects of hauling, and reduce haul trips in response to congestion. Therefore, no foreseeable cumulative impacts are expected.

3) 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 Project is for the construction of a mixed-use development containing 42 residential units and 1,770 square feet of ground-floor retail. The project involves the demolition of the existing 6,768 square-foot commercial building.

The subject site is substantially surrounded by urban uses in close proximity to major arterials including Motor Avenue to the west and Palms Boulevard to the north. Lots adjacent to the subject site are zoned R3-1, C2-1, and [Q]PF-1XL, and are developed with low- to mid-rise multi-family and commercial uses. Neighboring lots to the east (across the alley) are zoned R3-1 and developed with multi-family uses. The lot to the north (across the alley) is zoned [Q]PF-1XL and developed with an elementary school. The subject site is also served by a variety of transit options including the Metro Expo Line (806) Palms Station, which is located approximately 0.3 miles from the subject site, as well as by local and regional bus lines operated by the Culver City Bus, Big Blue Bus, Los Angeles Metro, and LADOT. The subject site is located within an established area that is fully-developed with a commercial corridor with low- to medium-density multi-family and commercial uses. The site is previously disturbed and surrounded by development. As such, there are no unusual circumstances which may lead to a significant effect on the environment.

- 4) **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 Scenic Highway is located over 10 miles west of the subject site. Therefore, no damage to scenic resources within a state scenic highway would occur as a result of this Project.

- 5) **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.*

The subject property is not in an officially mapped area of severe geologic hazard, or within an official Seismic Hazard Zone. 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.

- 6) **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 existing one-story commercial building was built in 1923 and is known as the Palms Market. 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.

The subject site was found to be a potential historic resource based on the City's HistoricPlacesLA website and SurveyLA, the citywide survey of Los Angeles, with the existing Palms Market on-site as a "rare example of an early neighborhood market still in operation at its original location". However, a Historical Evaluation report prepared by Sapphos Environmental, Inc., dated March 10, 2017, found the project will not result in any impacts to a historical resource. The report was accepted by the Office of Historic Resources ("OHR") in correspondence dated March 20, 2017. 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.