

COUNTY CLERK'S USE

CITY OF LOS ANGELES  
OFFICE OF THE CITY CLERK  
200 NORTH SPRING STREET, ROOM 395  
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT  
**NOTICE OF EXEMPTION**  
(PRC Section 21152; CEQA Guidelines Section 15062)

Pursuant to Public Resources Code § 21152(b) and CEQA Guidelines § 15062, the notice should be posted with the County Clerk by mailing the form and posting fee payment to the following address: Los Angeles County Clerk/Recorder, Environmental Notices, P.O. Box 1208, Norwalk, CA 90650. Pursuant to Public Resources Code § 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS	SCH NUMBER
--	------------

LEAD CITY AGENCY <b>City of Los Angeles (Department of City Planning)</b>	CASE NUMBER ENV-2024-8069-CE
--	---------------------------------

PROJECT TITLE Mission Lofts	COUNCIL DISTRICT 14 – Jurado
--------------------------------	---------------------------------

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map) <b>4107 - 4117 North Mission Road, 4128 East Supreme Court</b>	<input type="checkbox"/> Map attached.
---	--

PROJECT DESCRIPTION: Demolition of a retail use and one residential dwelling, and the construction and use of a new 20,265-square-foot mixed-use project, with 22 apartment units and a 500-square-foot office, in conjunction with an application for a haul route for the export of approximately 3,500 cubic yards of earth. The total grading proposed is approximately 4,056 cubic yards. As a State Density Bonus project, two units will be reserved for Extremely Low Income households. The four-story building includes a garage level, with variable height from 32.1 feet to 41.33 feet. The project will provide 29 vehicle parking spaces, 24 long-term bicycle parking spaces, and 5 short-term bicycle parking spaces. The 13,510-square-foot site consists of three abutting lots and does not have protected trees or street trees.	<input type="checkbox"/> Additional page(s) attached.
--	---


NAME OF APPLICANT / OWNER: <b>Harout Dermendjian</b>
---

CONTACT PERSON (If different from Applicant/Owner above) <b>Ron Mandalian, Urban Design Specialists</b>	(AREA CODE) TELEPHONE NUMBER   EXT. (310)301-1810
--	--

EXEMPT STATUS: (Check all boxes, and include all exemptions, that apply and provide relevant citations.)	
STATE CEQA STATUTE & GUIDELINES	
<input type="checkbox"/> STATUTORY EXEMPTION(S) Public Resources Code Section(s) _____	
<input checked="" type="checkbox"/> CATEGORICAL EXEMPTION(S) (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33) CEQA Guideline Section(s) / Class(es) <u>Section 15332 / Class 32</u>	
<input type="checkbox"/> OTHER BASIS FOR EXEMPTION (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b) ) _____	

JUSTIFICATION FOR PROJECT EXEMPTION: The proposed mixed-use project is consistent with the applicable general plan designation, policies, and zoning for the subject site. The project site is 0.31 acres, substantially surrounded by urban uses, and is located within the City of Los Angeles. The site was partially previously developed and has no value as habitat for endangered, rare or threatened species. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. The site can be served by utilities and public services. <input checked="" type="checkbox"/> None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project. <input type="checkbox"/> The project is identified in one or more of the list of activities in the City of Los Angeles CEQA Guidelines as cited in the justification.	<input checked="" type="checkbox"/> Additional page(s) attached
--	---

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.  
If different from the applicant, the identity of the person undertaking the project.

<b>CITY STAFF USE ONLY:</b>	
CITY STAFF NAME AND SIGNATURE Linda Lou 	STAFF TITLE City Planner

ENTITLEMENTS APPROVED CEQA Categorical Exemption for Haul Route
--

DISTRIBUTION: County Clerk, Agency Record  
Rev. 1-30-2025



## JUSTIFICATION FOR PROJECT EXEMPTION CASE NO. ENV-2024-8069-CE

4107-4117 North Mission Road; 4128 East Supreme Court

---

### **Project Description**

The Project is the demolition of an existing retail use and one residential dwelling with a total square footage of 1,314 square feet and the construction, use and maintenance of a 4-story, 20,265-square-foot mixed-use project with 22 apartment units, a 500-square-foot office, and a parking garage with 25 vehicle parking spaces. The State Density Bonus Project will reserve two (2) units for Extremely Low Income Households. The Project Site consists of three contiguous lots with a total size of approximately 13,510 square feet. The Project site is bounded to the east by Mission Road where it has approximately 150 feet of street frontage. The new building has a proposed height that varies from approximately 32 feet, 1 inch (32.1 feet) to 41 feet, 4 inches (41.33 feet). The Project will provide a total of 29 vehicle parking spaces (25 spaces in the garage and 4 spaces in the alley outside the garage), 24 long-term bicycle parking spaces, and five short-term bicycle parking spaces. Seven trees will be planted. The property is zoned [Q]C2-1 and has a General Plan Land Use Designation of General Commercial.

Approximately 4,056 cubic yards of total grading is proposed in conjunction with an application for a haul route for the export of approximately 3,500 cubic yards of earth. The proposed grading for cut is 3,353 cubic yards and the proposed grading for fill is 703 cubic yards. A project requires a haul route when a site is located in a Special Bureau of Engineering (BOE) Grading Area and involves the import or export of earth material of 1,000 cubic yards or more. The subject site is located within a Special Bureau of Engineering (BOE) Grading Area and proposes the export of approximately 3,500 cubic yards of earth. Therefore, a haul route is required.

The project site does not have protected trees or street trees in the public right-of-way, according to the Tree Disclosure Statement signed by the applicant on November 20, 2023. As a mixed-use project developed on an infill site, this Project qualifies for a Categorical Exemption, pursuant to CEQA Guidelines Section 15332 (Class 32).

### **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 Site is located within a Hillside Area, Special Grading Area (BOE Basic Grid Map A-13372), Very High Fire Hazard Severity Zone, and a Liquefaction Zone and is subject to specific Regulatory Compliance Measures (RCMs) in the City of Los Angeles that regulate the grading and construction of projects in these particular types of “sensitive” locations. The RCMs will reduce any potential impacts to less than significant, including but not limited to the following:

- **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-4 (Liquefaction Area):** The Project shall comply with the Uniform Building Code Chapter 18. Division 1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. 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 liquefaction 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.

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, all haul route applications require the submittal of a Geology and Soils Report to the Department of Building and Safety (DBS). A Geology and Soils Report Approval Letter for the subject property, which details conditions of approval that must be followed, has been issued by DBS on June 26, 2023 (Log # 126478). 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. Thus, in conjunction with the above RCMs and compliance with other applicable regulations, the Project will not result in a significant impact based on its location.

- **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.

The subject site is in a Very High Fire Hazard Severity Zone (VHFHSZ). This does not support an unusual circumstance as the City has thousands of similar developments of the same size and scale in VHFHSZ. Additionally, the existing regulatory compliance measures will ensure there is no potential for an impact. Such areas are subject to existing emergency plans and regulations that govern development in fire hazards areas:

- Adopted emergency response plans and emergency evacuation plans applicable to the City of Los Angeles, include the City of Los Angeles Emergency Operations Plan and the Los Angeles County Operational Area Emergency Response Plan (OAERP). The OAERP defines responsibilities and provides guidance to agencies and jurisdictions within the County Operational Area on how to interface with the Operational Area Coordinator during emergencies and disasters.<sup>1</sup> The City's Emergency Operations Plan and Annexes identify roles, responsibilities and required actions for various City departments, particularly LAFD and the LAPD. In addition to their emergency response plans, both the City and County also designate Disaster Routes, which are freeway, highway or arterial routes pre-identified for use during emergencies. Disaster routes are not the same as evacuation routes. The Evacuation Annex of the City's Emergency Operation Plan provides that "[p]rimary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County."<sup>2</sup> Disaster routes are used to bring emergency personnel, equipment, and supplies to impacted areas, while evacuation routes are used to move an affected population out of an impacted area. The closest

---

<sup>1</sup> OAERP, p. 20

<sup>2</sup> Los Angeles Base Emergency Operations Plan 2023, October 2020 [Evacuation Functional Support Annex](#) p. 17

County-designated primary (i.e. freeway) Disaster Route to the project site is the I-5 freeway to the west.<sup>3</sup> Mission Road/Huntington Drive is also a Disaster Route.

- Fire, Building, and Zoning Code. Properties in VHFHSZs must comply with the requirements of Fire Code Section 57.322, which requires brush clearance within 200 feet of any structure. LAFD performs microenvironment weather analysis to check for irregular weather patterns and changes, which alerts LAFD to conditions such as windy days combined with low humidity. LAFD uses a Burning Index<sup>4</sup> to determine when to call a Red Flag Day.<sup>5</sup> A Red Flag Day is when the potential for a fast-moving brush fire is extremely high, when wind speeds are 25 mph or more and the humidity is 15 percent or less. On those days, illegally parked cars in VHFHSZ areas may be towed if their presence would prevent roadway access needed by LAFD. LAFD also has a significant air response ready to deploy, including water-dropping helicopters, and the mission of LAFD Air Operations includes brush fire suppression.<sup>6</sup> LAFD also has access to additional helicopters, fixed-wing aircraft, bulldozers, and fire engines through mutual aid agreements with the state, County, and other cities in the region. In addition to attacking wildfires from the sky, LAFD also has ground resources such as fire engines and trucks.

Chapter 33 of the City's Fire Code provides requirements designed to reduce risk of fire ignition during construction. These include, but are not limited to, prohibition of smoking except in areas approved by the LAFD, refueling of equipment in appropriate locations, preparation of a fire prevention program, and designation of fire watch personnel during occurrence of hazardous construction activities. The Fire Code (LAMC Section 57.4906.5.2) also requires the management of hazardous vegetation and fuel, as well as maintenance of defensible space in wildland-urban interface areas. The Fire Code also includes regulations that address building materials and construction methods for construction in VHFHSZs, that are intended to reduce exterior wildfire exposure. LAFD's Hydrant and Access approval was cleared April 15, 2024, as part of the project's Building Permit No. 22010-10000-06499.

**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.*

According to Navigate LA and the Department of Building and Safety Haul Route Requests Status Table, there are no other haul route approvals, and no other haul route applications being processed in within 500 feet of the Subject Site.

Haul routes are tracked via a Map for each district, accessible on NavigateLA, to identify the locations of construction sites for which a haul route was required.

In addition, the haul route approval will be subject to recommended conditions prepared by the Los Angeles Department of Transportation (LADOT) to be considered by the Board of Building and Safety Commissioners that will reduce the impacts of construction related hauling activity, monitor the traffic effects of hauling, and reduce haul trips in response to congestion. Therefore, in conjunction with citywide RCMs and compliance with other applicable regulations, no foreseeable cumulative impacts are expected.

---

<sup>3</sup> <https://pw.lacounty.gov/dsg/disasterroutes/map/Los%20Angeles%20Central%20Area.pdf>

<sup>4</sup> A Burning Index is a number used by the National Oceanic and Atmospheric Administration to describe the potential amount of effort needed to contain a single fire in a particular fuel type within a rating area

<sup>5</sup> LAFD, <https://ers.lafd.org/redflag/>, accessed March 4, 2025

<sup>6</sup> LAFD, <https://www.lafd.org/about/special-operations/air-operations>, accessed March 4, 2025.

**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 Project is a proposed 4-story, 20,265-square-foot mixed-use project with 22 apartment units and a 500-square-foot office with a parking garage on three contiguous lots with a total square footage of approximately 13,510 square feet in an area zoned and designated for such development. The parking garage will provide 25 of the 29 vehicle parking spaces, the other four parking spaces will be located in the alley. The lots facing Mission Road in this area have [Q]C2-1 commercial zoning under Ordinance 173070, which was adopted in 2000 and has a [Q] Qualifying Condition that prohibits 100 percent residential development. New developments that construct housing must also incorporate commercial uses. To the west of the [Q]C2-1 lots are single-family zoned lots and across the street the lots have M1-1 Limited Industrial zoning. Therefore, lots in the vicinity are developed with single-family dwellings, low-scale multi-family residential buildings, and commercial and light industrial uses. The Project proposes a total of 20,265 square feet on a Site that is permitted to have a maximum Floor Area Ratio of 1.5:1 or approximately 20,265 square feet. The 4-story apartment building is subject to the City's Transitional Height requirements and the proposed height of the building varies from approximately 32 feet, 1 inch (32.1 feet) to 41 feet, 4 inches (41.33 feet), which considers the elevation of the new building from the abutting single-family zone and an existing grade difference of approximately 8.33 feet from the adjacent property per the topographical survey dated May 9, 2022. Nearby, existing buildings range from one to four stories in height. Therefore, the 4-story Project is not unusual for the vicinity of the Subject Site. Thus, there are no unusual circumstances which may lead to a significant effect on the environment, and this exception does not apply.

**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 project site is located approximately 27 miles east of this State Scenic Highway. Therefore, the Project will not result in damage to any 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, 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

Page 5 of 7

not result in a substantial adverse change to the significance of a historical resource and this exception does not apply.

**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 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.*

The Site consists of three contiguous lots. One is currently developed with a commercial use and one dwelling unit, and the other two lots are vacant. The Site is zoned [Q]C2-1 and has a General Plan Land Use Designation of General Commercial. As a mixed-use project with 22 multi-family dwelling units and a 500-square foot office, the Project is in conformance with the applicable Northeast Los Angeles Community Plan designation and policies, and all applicable zoning designations and regulations. The lots are subject to a [Q] Condition under Ordinance 173070, adopted in 2000, that prohibits 100 percent residential development. The new mixed-use project is consistent with the zoning, including the [Q] condition.

*(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 0.31 acres. Lots in the vicinity of the Subject Site are developed with single-family dwellings, low-scale multi-family residential buildings, and commercial, and light industrial uses.

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

The Site is currently developed with a commercial use and one dwelling unit. The Site is not a wildland area, and is not inhabited by endangered, rare, or threatened species. According to ZIMAS, the Project Site is not located within an adopted natural community conservation plan, a habitat conservation plan or other adopted natural resource protection plan (LA County Significant Ecological Area) and the Biological Resource Potential is Low. The Applicant's Owner's Declaration of Biological Resources dated December 11, 2024, states that the Project Site does not have certain known biological resources, such as water resources or protected trees and/or shrubs. There are no protected trees on the Site and there are no street trees adjacent to the Site, according to the Tree Disclosure Statement signed by the Applicant, dated November 20, 2023. There are no street trees in the adjacent public right-of-way along Mission Road or Supreme Court. Thus, the Proposed Project will not have any negative impacts on rare, endangered, or threatened species and meets this condition.

*(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 Project will be subject to Regulatory Compliance Measures (RCMs). These require compliance with the City of Los Angeles Noise Ordinance; pollutant discharge, dewatering, 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 Project does not exceed the threshold criteria established by LADOT for preparing a traffic study and does not require VMT analysis, per the Transportation Assessment Referral Form signed by LADOT staff, dated January 18, 2024. The Project 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 a new 22-unit residential apartment development and 500-square-foot office will be on a Site that was previously developed on one of the three lots, is surrounded by development, and is consistent with the General Plan. Therefore, it can be found that the Project meets the qualifications of the Class 32 Exemption.