

REPORT TO THE REGIONAL PLANNING COMMISSION

DATE ISSUED: May 20, 2026

HEARING DATE: June 3, 2026 AGENDA ITEM: 11

PROJECT NUMBER: PRJ2021-002634

PERMIT NUMBER(S): Tentative Tract Map No. 83480 (RPPL2021007371)
Administrative Housing Permit No. RPPL2023004361

SUPERVISORIAL DISTRICT: 5

PROJECT LOCATION: 9072 Arcadia Avenue, San Gabriel

OWNER: Jianfei Ji

APPLICANT: Peterzon Sy

PUBLIC MEETINGS HELD: 1 of 5

INCLUSIONARY HOUSING ORDINANCE (“IHO”): The Project is subject to the IHO.

CASE PLANNER: Michelle Lynch, Principal Planner
mlynch@planning.lacounty.gov

RECOMMENDATION

The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing:

The Los Angeles County Department of Regional Planning (“LA County Planning”) staff (“Staff”) recommends **Approval** of Project Number PRJ2021-002634, Tentative Tract Map No. 83480 (RPPL2021007371) (“TR83480”) and Administrative Housing Permit No. RPPL2023004361 based on the Findings (Exhibit C – Draft Findings) contained within this report and subject to the Draft Conditions of Approval (Exhibit D – Draft Conditions of Approval).

Staff recommends the following motion:

CEQA:

I, MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING AND FIND THAT THE PROJECT IS CATEGORICALLY EXEMPT PURSUANT TO STATE AND LOCAL CEQA GUIDELINES.

ENTITLEMENTS:

I, MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE TENTATIVE TRACT MAP NUMBER 83480 (RPPL2021007371) AND ADMINISTRATIVE HOUSING PERMIT NO. RPPL2023004361 SUBJECT TO THE ATTACHED FINDINGS AND CONDITIONS.

PROJECT DESCRIPTION

A. Entitlements Requested

- Tentative Tract Map No. 83480 (“TR83480”) to create one multi-family lot with five detached condominium units on 0.6 net acres pursuant to Los Angeles County (“County”) Code Sections 21.40.010 (Tentative Maps).
- Administrative Housing Permit No. RPPL2023004361 to provide one set-aside housing unit at a maximum affordability of 120 percent of the Area Median Income (“AMI”), pursuant to County Code Section 22.121.040 (Inclusionary Housing Application Requirements) and Table 22.121.050-B (Inclusionary Housing Requirements For-Sale Projects).

B. Project

TR83480 to create one multi-family lot is located at 9072 Arcadia Avenue, San Gabriel, within the West San Gabriel Valley Planning Area ("Project Site") within a residential neighborhood that includes single-family and multi-family residences. The Project Site is currently vacant, but was developed with one single-family residence, with accessory structures removed. The Project Site fronts Arcadia Avenue, a 40-foot-wide parkway on the Master Plan of Highways. The five detached condominium residences are proposed in a row with vehicular access from a shared 20-foot-wide private driveway and fire lane connecting to Arcadia Avenue. The private driveway and fire lane are proposed along the eastern portion of the lot, providing vehicular access to the detached garages. The Project also includes a five-foot-wide walkway throughout the Project Site, providing direct pedestrian access to all units. All detached condominium units are proposed to be two stories and 25 feet high, with four bedrooms, ranging in size from 1,900 to 2,600 square feet. The units each include a great room/kitchen, one bathroom, and a bedroom located on the ground floor, three bedrooms and three bathrooms on the second floor, and a two-car garage. Grading consists of approximately 2,627 total cubic yards (“cy”), including 380 cy cut, 210 cy fill, 170 cy export, and 1,867 cy over excavation.

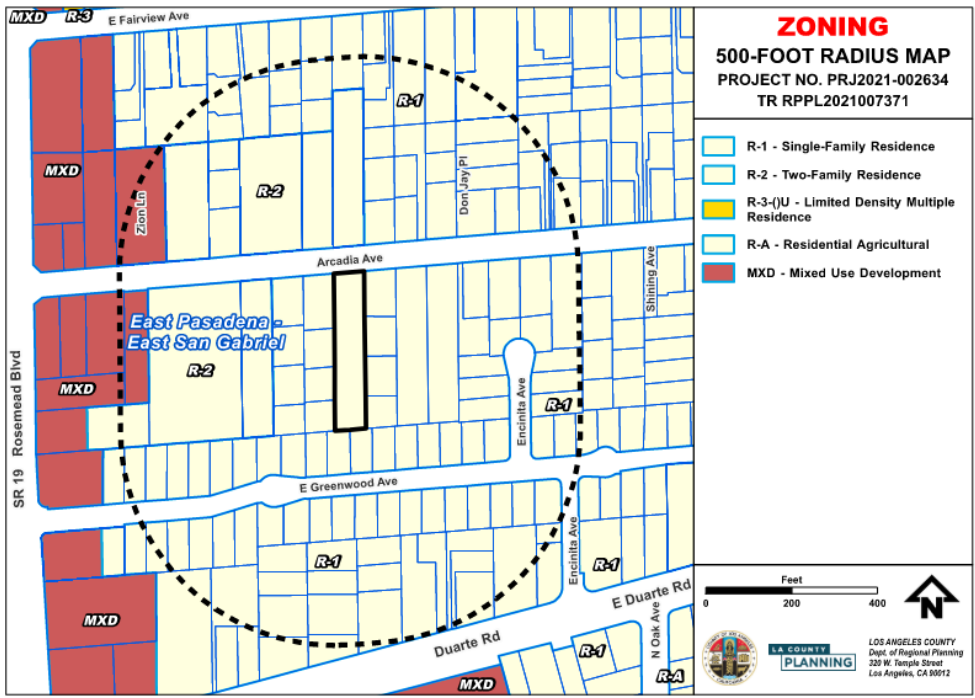
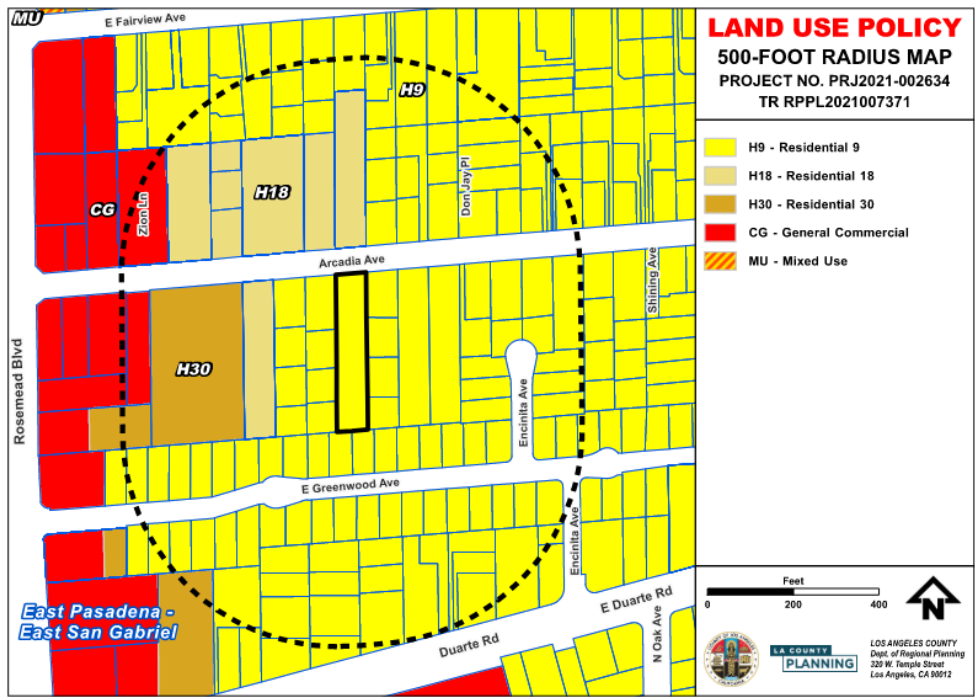
The Project application was deemed complete on December 8, 2022, before the effective date of the West San Gabriel Valley Area Plan (“WSGVAP”), a component of the General Plan. Therefore, the Project is analyzed under the General Plan and Zoning in effect at the time the application was deemed complete. The General Plan Land Use designation and zoning are the same today as they were in 2023; however, the East Pasadena-East San Gabriel Valley Community Standards District (“CSD”) has been updated and includes the West San Gabriel Valley Planning Area Standards District (“PASD”). The Project is

subject to the CSD, effective at the time of the project application deemed complete date and not the PASD.

SUBJECT PROPERTY AND SURROUNDINGS

The following chart provides property data within a 500-foot radius:

LOCATION	GENERAL PLAN*	ZONING	EXISTING USES
SUBJECT PROPERTY	H9 (Residential 9 – 0 to 9 Dwelling Units Per Net Acre)	R-1	Single-Family Residence
NORTH	H9, H18 (Residential 18 – 0 to 18 Dwelling Units Per Net Acre)	R-1, R-2 (Two-Family Residences)	Single-Family and Multi-Family Residences
EAST	H9, H18, H30 (Residential 30 – 20 to 30 Dwelling Units Per Net Acre), CG (General Commercial)	R-1, R-2, MXD (Mixed Use Development)	Single-Family and Multi-Family Residences
SOUTH	H9	R-1	Single-Family and Multi-Family Residences
WEST	H9	R-1	Single-Family and Multi-Family Residences



PROPERTY HISTORY

A. Zoning History

ORDINANCE NO.	ZONING	DATE OF ADOPTION
1494_1	Zoning Code Established	September 12, 1927
1813	R-1 Single Family Residence	March 24, 1930
3045	R-1	January 5, 1938
6287	R-1	October 9, 1953

B. Previous Cases

CASE NO.	REQUEST	DATE OF ACTION
RPPL2023004172	CSD Modification	Withdrawn

C. Violations

CASE NO.	VIOLATION	CLOSED/OPEN
N/A		

ANALYSIS

A. Land Use Compatibility

The Project is located within the H9 land use category of the General Plan, intended for low-density residential uses. This designation allows for a maximum density of six dwelling units per net acre. The Project proposes to create five dwelling units on a 0.6-net-acre site. The Project consists of one multi-family lot with five detached condominium dwelling units. It will result in the development of five units, which is consistent with the maximum allowable density of six units. Therefore, the proposed development is consistent with the General Plan. Further, if the units created are first leased rather than sold the Project has been conditioned to provide tenant occupants with notification of the intent to sell the units 180 days prior to termination of tenancy in the event the new condominium units are first leased and then later sold.

B. Neighborhood Impact (Need/Convenience Assessment)

The proposed development consists of five new detached condominiums. The R-1 zoning allows single-family residences. The Project is in a single-family and multi-family neighborhood. The proposed lot is compatible in use, design, and density. The proposed lot fronts Arcadia Avenue, a 40-foot-wide public street, and would be served by existing infrastructure, including roads and utilities for public water and sewer. The Project is low-density and similar to the surrounding residential neighborhood development, consisting mainly of single-family and lower-density multi-family residences. The proposed multi-family lot will blend in with the established residential neighborhood and would not change the character of the neighborhood.

C. Design Compatibility

A modern Spanish design is proposed for the residential buildings, containing architectural features such as ample windows, covered porches, and balconies. The front unit will have front doors on the street-facing façade, while the other units' front doors face the pedestrian walkway. This design enhances the built environment and pedestrian experience. The garages face the shared private driveway and fire lane to the west; therefore, garage doors from the interior units are not visible from the public right-of-way. A five-foot-wide pedestrian walkway provides all units with connectivity and access to the public right-of-way and Arcadia Avenue. The two-story-high residential buildings have a maximum height of 25 feet and 3.5 inches, in compliance with the CSD's two-story limit and under the maximum height limit of 30 feet in the R-1 Zone of the CSD.

The surrounding developments are similar single-story, two-story, single, and multi-family residences. Therefore, the Project is compatible with the surrounding design and character, as well as with the CSD and other applicable development standards as detailed in the attached Findings (Exhibit B - Draft Findings).

GENERAL PLAN/COMMUNITY PLAN CONSISTENCY

The Project is consistent with applicable goals and policies of the General Plan. The Project was deemed complete on December 8, 2022, before the adoption of the WSGVAP on March 1, 2025. Consistency findings can be found in the attached Findings (Exhibit B – Draft Findings).

HOUSING ACCOUNTABILITY (“HAA”) AND HOUSING CRISIS (“SB330”) ACTS

The HAA applies to this Project. The HAA limits a local government’s ability to deny, downsize, or render infeasible housing development projects containing either affordable or market-rate units. For a project to qualify for the protections included in the HAA, it must meet the definition of a housing development project. This Project qualifies as a housing development project because it consists of more than one residential unit and is consistent with the General Plan, Zoning, and development standards.

The HAA limits a local government’s ability to deny, downsize, or render infeasible housing development projects, both affordable and market-rate units. According to the California Department of Housing and Community Development’s, Housing Accountability Act Technical Assistance Advisory published on September 15, 2020, a local agency shall not deny, down-size, or render a housing development infeasible if it complies with applicable, objective general plan and zoning, and subdivision standards and criteria, including design review standards, in effect at the time the application was deemed complete, unless written findings supported by a preponderance of evidence (evidence for denying the Project outweighs the evidence for supporting it) on the record that both of the following conditions have been met:

- 1) The project will have a specific, adverse impact upon public health or safety unless the project is denied or approval conditioned to be developed at a lower in density (i.e.,

a significant, quantifiable, direct and unavoidable impact based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete).

2) There is no feasible method to satisfactorily mitigate or avoid the adverse impact. Feasible means capable of being accomplished in a successful manner within a reasonable time period, taking into account economic, environmental, social, and technological factors.

Violation of the HAA will subject the County to paying attorneys' fees and could result in substantial fines against the County in a successful court action. A court must award attorneys' fees to a party successfully challenging the County for violating the HAA. In addition, the court also must issue an order requiring compliance with the HAA. The County then must comply with that order within 60 days or be subject to, at a minimum, a penalty of \$10,000 per housing unit proposed by the Project. Therefore, it is imperative that the County comply with State law, specifically the HAA, when approving or disproving housing development projects.

Further, due to the severe lack of housing of both affordable and market-rate units, Governor Newsom signed the Housing Crisis Act (SB 330) into law to preserve the existing housing inventory, accelerate housing production by prohibiting the application of additional regulations once a project application is deemed complete, and limit the total number of public meetings to five. The law took effect on January 1, 2020, and under SB 8 (effective January 1, 2022), will extend to January 1, 2030. See Government Code sections 65905.5 and 65589.5.

Pursuant to SB 330, the number of publicly held meetings does not exceed the five-meeting limit. As of January 1, 2020, one meeting occurred on the following dates:

- Regional Planning Commission Hearing held on June 3, 2026

SUBDIVISION AND ZONING ORDINANCE CONSISTENCY

The Project complies with all applicable subdivision and zoning requirements, including Chapter 22.366 (East Pasadena-East San Gabriel CSD). The Project was deemed complete on December 8, 2022, before the adoption of the West San Gabriel Valley Planning Area Standards District on March 1, 2025. The project is consistent with the IHO because it provides one affordable unit as required. Consistency findings can be found in the attached Findings (Exhibit C – Findings).

BURDEN OF PROOF

The applicant is required to substantiate all facts identified by California Government Code Section 66474 (Tentative Maps). The Burden of Proof with the applicant's responses is attached (Exhibit E – Applicant's Burden of Proof). Staff is of the opinion that the applicant has met the burden of proof.

ENVIRONMENTAL ANALYSIS

Staff recommends that this Project qualifies as a Class 15 (Minor Land Divisions) Categorical Exemption pursuant to California Environmental Quality Act (Public Resources Code section 21000, et seq.) (“CEQA”), the State CEQA Guidelines, and the Environmental Document Reporting Procedures and Guidelines for the County, on the basis that the Project involves subdividing four or fewer parcels. The Project will subdivide a flat property, with an average slope that is less than 20 percent, into one parcel and five condominium dwellings, and does not involve a prior subdivision in the last two years. The Project Site fronts a public street and will be served by public water and sewer. The Project is not on a list maintained by the California Department of Toxic Substances Control and the Regional Water Quality Control Board and does not contain any registered historic resources. The Project is also not located near a scenic highway, and there is no reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances, nor result in cumulative impacts. Therefore, there are no exceptions to the exemption, and therefore, the project is categorically exempt. An environmental determination (Exhibit D – Environmental Determination) was issued for the Project

COMMENTS RECEIVED

A. County Department Comments and Recommendations

The County Subdivision Committee, consisting of representatives from LA County Planning and the County Departments of Public Works, Fire, Parks and Recreation, and Public Health, cleared Tentative Tract Map No. 83480 dated May 20, 2025, for public hearing.

The Los Angeles County Development Authority (“LACDA”) also reviewed and cleared the Project for public hearing with recommended conditions.

B. Other Agency Comments and Recommendations

Staff have not received any comments at the time of report preparation.

C. Public Comments

Staff received three emails from one constituent in opposition to the project. (Exhibit I- Public Comments).

Report

Reviewed By:



Joshua Huntington, AICP Supervising Regional Planner

Report

Approved By:



Susan Tae, AICP, Assistant Administrator

LIST OF ATTACHED EXHIBITS	
EXHIBIT A	Tract Map No. 83480 and Exhibit Map dated May 20, 2025
EXHIBIT B	Project Summary Sheet
EXHIBIT C	Draft Findings
EXHIBIT D	Draft Conditions of Approval
EXHIBIT E	Applicant's Burden of Proof
EXHIBIT F	Environmental Determination
EXHIBIT G	Informational Maps
EXHIBIT H	Photographs
EXHIBIT I	Public Comments

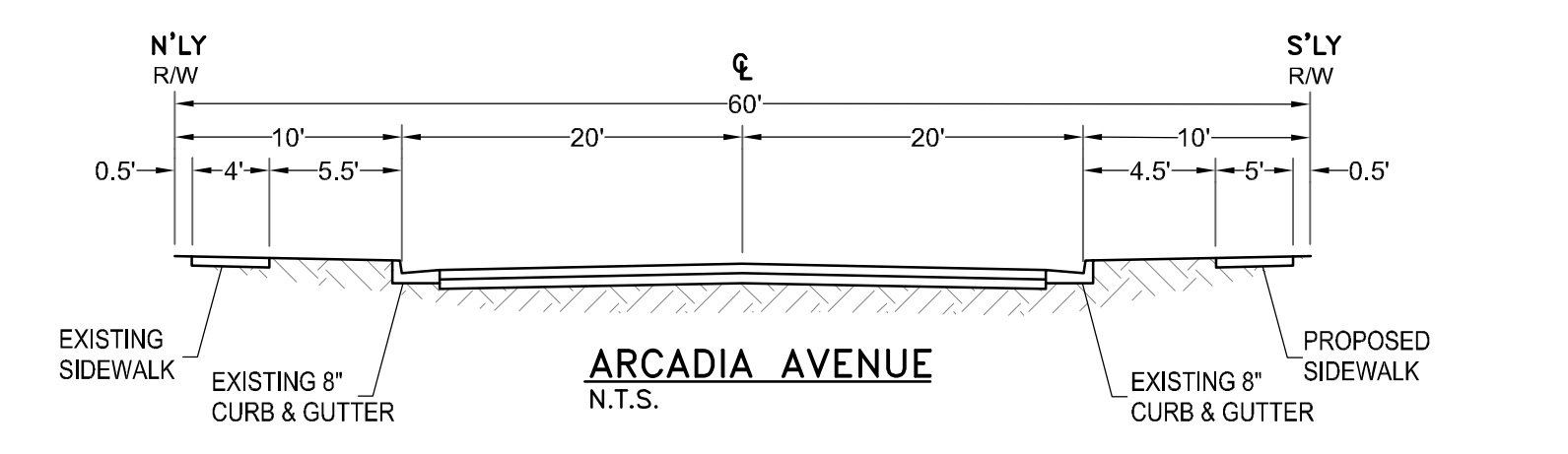
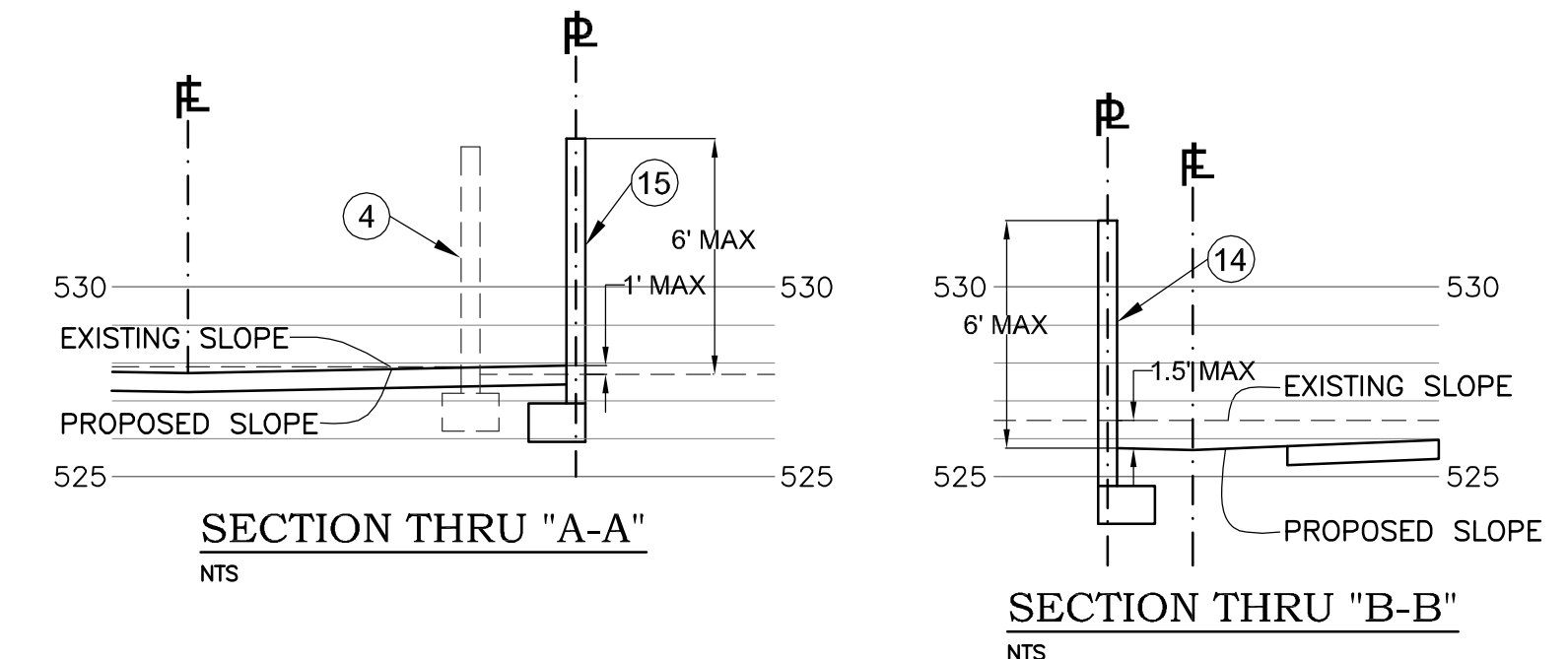
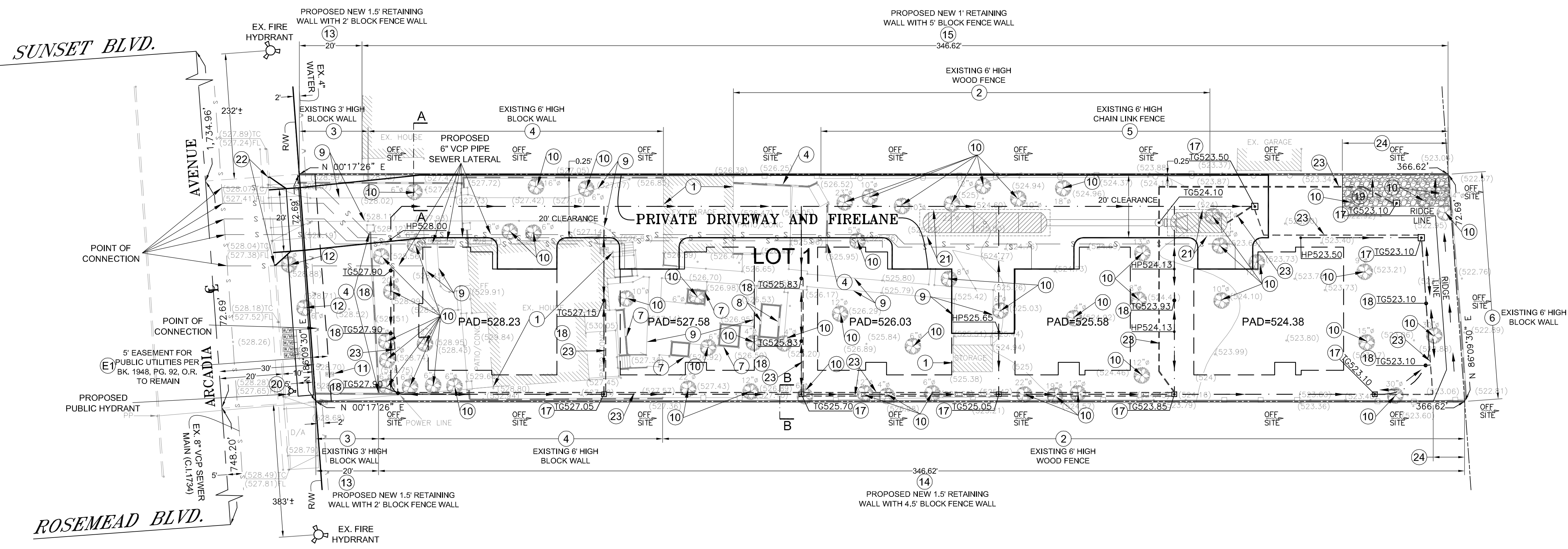
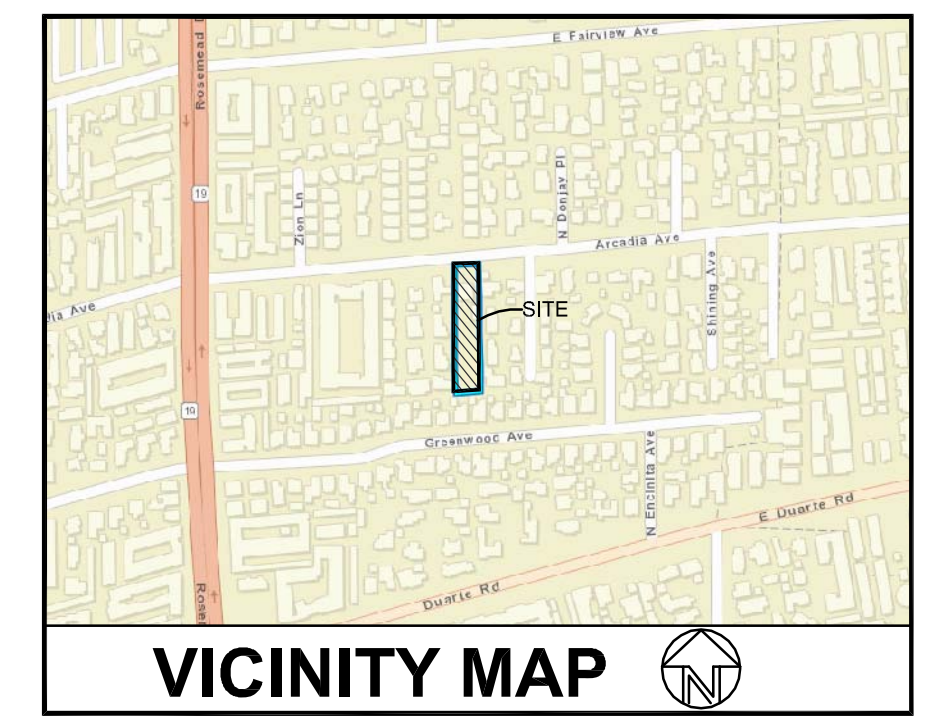
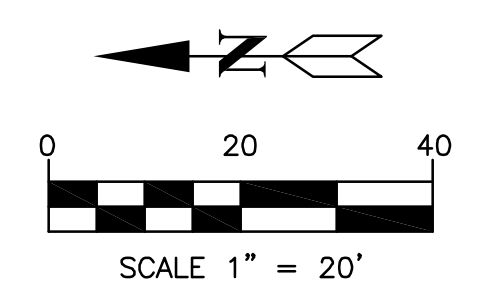
**"MAJOR LAND DIVISION
TENTATIVE TRACT MAP NUMBER 83480
(FOR CONDOMINIUM PURPOSES)
LOCATED IN THE UNINCORPORATED TERRITORY OF
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA"**

A PORTION OF LOT 43 OF TRACT NO 3747, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA,
AS PER MAP RECORDED IN BOOK 40 PAGE 95 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER
OF SAID COUNTY.

APN: 5379-024-021

LEGENDS & ABBREVIATIONS

- | | | | | | |
|-----|-------|--------------------|--|-------|----------------|
| TC | | TOP OF CURB | | | TREE |
| FL | | FLOW LINE | | | SHEET FLOW |
| FS | | FINISHED SURFACE | | | SEWER MANHOLE |
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| INV | | INVERT ELEVATION | | | LANDSCAPE AREA |
| DWY | | DRIVEWAY APPROACH | | | SEWER LINE |
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| --- | | CENTERLINE | | | |
| --- | | PROPERTY LINE | | | |
| --- | | FLOW LINE | | | |
| --- | | FLOW PATTERN | | | |



ENGINEER:
JACK LEE, RCE 40870
576 E. LAMBERT ROAD,
BREA, CA 92821
TEL: 714.671.1050
FAX: 714.671.1090

UTILITIES:
WATER - EAST PASADENA WATER COMPANY
SEWER - COUNTY OF LOS ANGELES
GAS - SOUTHERN CALIFORNIA GAS CO.
ELECTRICAL - SOUTHERN CALIFORNIA EDISON CO.
TELEPHONE - AT&T / SBC
TRASH - ATHENS DISPOSAL COMPANY
CABLE TV - CHARTER COMMUNICATION CABLE

PROJECT SUMMARY:
OWNER: E-HIGHLAND (US) CORP/JIANFEI JI
5003 GOLDEN WEST AVENUE, TEMPLE CITY, CA 91780
626-226-8864

PROJECT ADDRESS: 9072 ARCADIA AVENUE, SAN GABRIEL, CA 91775
PROJECT DESCRIPTION: 5 DETACHED CONDOMINIUM UNITS
EXISTING LOT: 1
PROPOSED LOT: 1
A.P.N.: 5379-024-021
EXISTING ZONING: R-1
PROPOSED ZONING: R-1
LAND USE DESIGNATION: H-9
EXISTING GENERAL PLAN: RESIDENTIAL
COMMUNITY STANDARD DISTRICT: EAST PASADENA-SAN GABRIEL
COMMUNITY STANDARDS DISTRICT

TOTAL AREA: 0.610 ACRE (26,580.20 S.F.)
AREAS: GROSS AREA: 0.610 ACRE (26,580.20 S.F.)
NET AREA: 0.602 ACRE (26,216.76 S.F.)

EXISTING MAIN HOUSE TO BE DEMOLISHED = 1,707.10 S.F.
EXISTING GARAGE TO BE DEMOLISHED = 548.69 S.F.
EXISTING STORAGE TO BE DEMOLISHED = 106.93 S.F.

NOTES:

- 1 EXISTING BUILDING TO BE REMOVED
- 2 EXISTING 6' HIGH WOOD FENCE TO BE REMOVED
- 3 EXISTING 3' HIGH BLOCK WALL TO BE REMOVED
- 4 EXISTING 6' HIGH BLOCK WALL TO BE REMOVED
- 5 EXISTING 6' HIGH CHAIN LINK FENCE TO BE REMOVED
- 6 EXISTING 6' HIGH BLOCK WALL TO REMAIN
- 7 EXISTING PLANTER WALL TO BE REMOVED
- 8 EXISTING POND TO BE REMOVED
- 9 EXISTING CONCRETE PAVEMENT TO BE REMOVED
- 10 EXISTING TREES TO BE REMOVED
- 11 EXISTING WATER METER TO BE REMOVED
- 12 EXISTING STREET TREE TO BE REMOVED
- 13 PROPOSED NEW 1' RETAINING WALL WITH 2' BLOCK FENCE WALL, TOTAL H = 3.5'
- 14 PROPOSED NEW 1.5' RETAINING WALL WITH 4.5' BLOCK FENCE WALL, TOTAL H = 6'
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- 17 PROPOSED CATCH BASIN
- 18 PROPOSED AREA DRAIN
- 19 PROPOSED RIP-RAP
- 20 PROPOSED 5' WIDE SIDEWALK
- 21 INSTALL STORMTECH CHAMBER INFILTRATION SYSTEM
- 22 PROPOSED DRIVEWAY APPROACH
- 23 PROPOSED PIPE
- 24 OMIT EVERY OTHER BLOCK WALL

EASEMENT NOTE:

- (E) 5' EASEMENT FOR PUBLIC UTILITIES PER BK. 1948, PG. 92, O.R. TO REMAIN

NOTE:
WASTE WATER WILL BE DISPOSED FROM JOB SITE TO THE
EXISTING MAIN BY GRAVITY.

EARTHWORK QUANTITIES:
CUT: 380 CY FILL: 210 CY
EXPORT: 170 CY OVER-EXCAVATION: 1,867 CY

SPECIAL NOTES:
THE QUANTITIES SHOWN HEREON ARE FOR PERMIT AND BONDING
PURPOSES ONLY. THE CONTRACTOR SHALL VERIFY QUANTITIES
PRIOR TO START OF GRADING

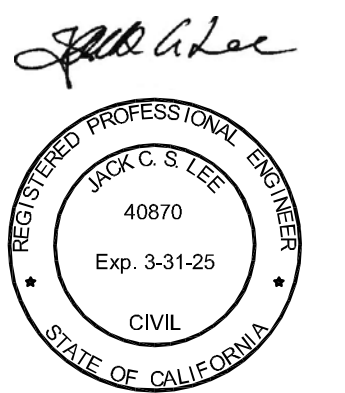
HOA NOTE:
HOMEOWNER'S ASSOCIATION SHALL BE ESTABLISHED
TO ENSURE BASIC MAINTENANCE AND INFRASTRUCTURE
DEVELOPMENTS OF ITS SURROUNDINGS.

NO OAK TREE ONSITE

NO ENTRANCE GATE PROPOSED

**LACFCD IS NOT TO MAINTAIN
ANY DRAINAGE DEVICES**

**LOS ANGELES DEPARTMENT OF
REGIONAL PLANNING
5/20/25
TENTATIVE MAP TR83480**



BENCHMARK: COUNTY BENCHMARK 1G3589 RDBM TAG IN S CB 2FT W/O BCR @ SW COR DUARTE RD & OAK AVE ELEVATION: 510.183'	PROJECT LOCATION: 9072 ARCADIA AVENUE, SAN GABRIEL, CA 91775	OWNER: E-HIGHLAND (US) CORP/ JIANFEI JI 5003 GOLDEN WEST AVENUE TEMPLE CITY, CA 91780 626-226-8864	DRAWN: PYS CHECKED: DATE: 08/07/2024 JOB NO.: 20-019-041 SCALE: 1" = 20' FILE NAME:	CALLAND ENGINEERING, INC. dba QUARTECH CONSULTANTS 576 E. LAMBERT ROAD, BREA, CA 92821 TEL: (714) 671-1050 FAX: (714) 671-1090	T-1 SHEET 1 OF 1 SHT.
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**"MAJOR LAND DIVISION
TENTATIVE TRACT MAP NUMBER 83480
(FOR CONDOMINIUM PURPOSES)
LOCATED IN THE UNINCORPORATED TERRITORY OF
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EXHIBIT MAP"**

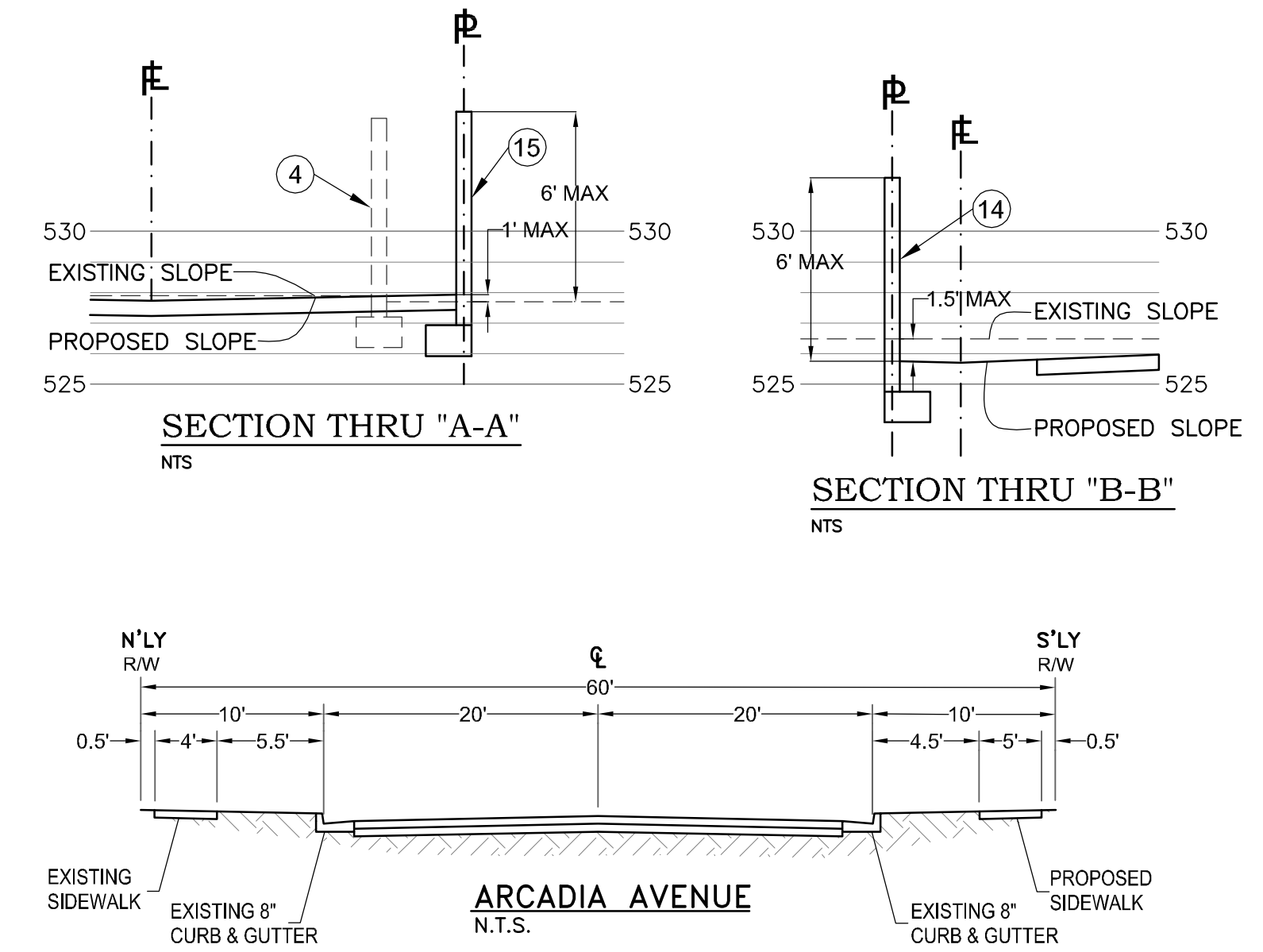
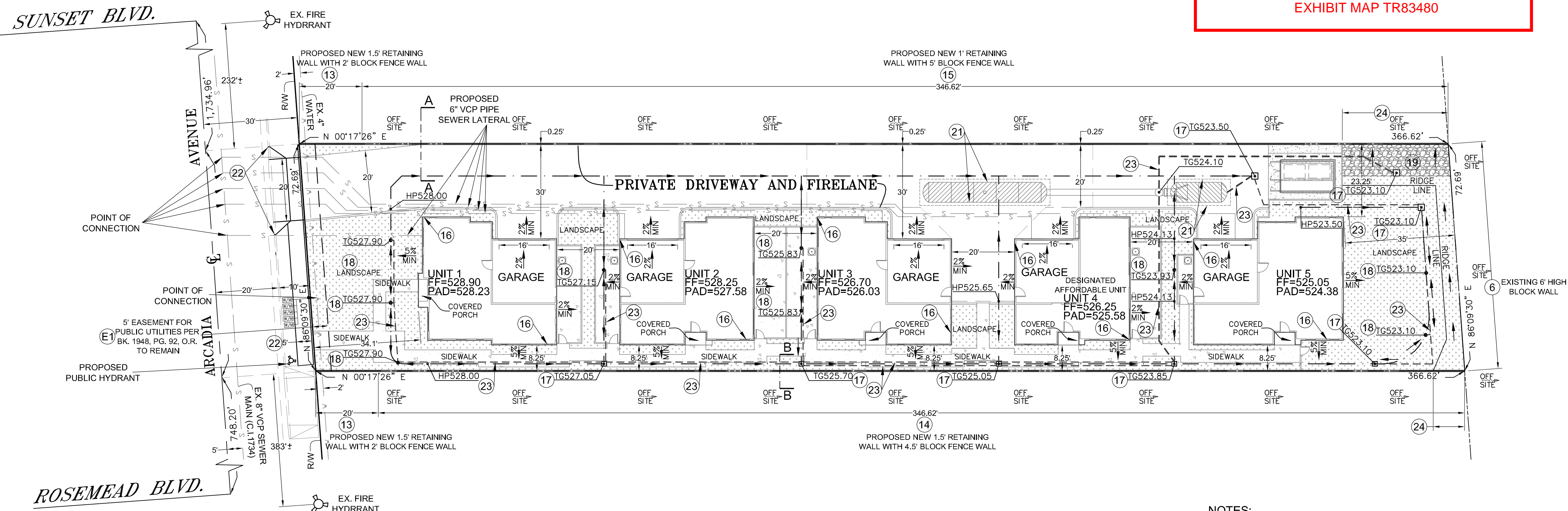
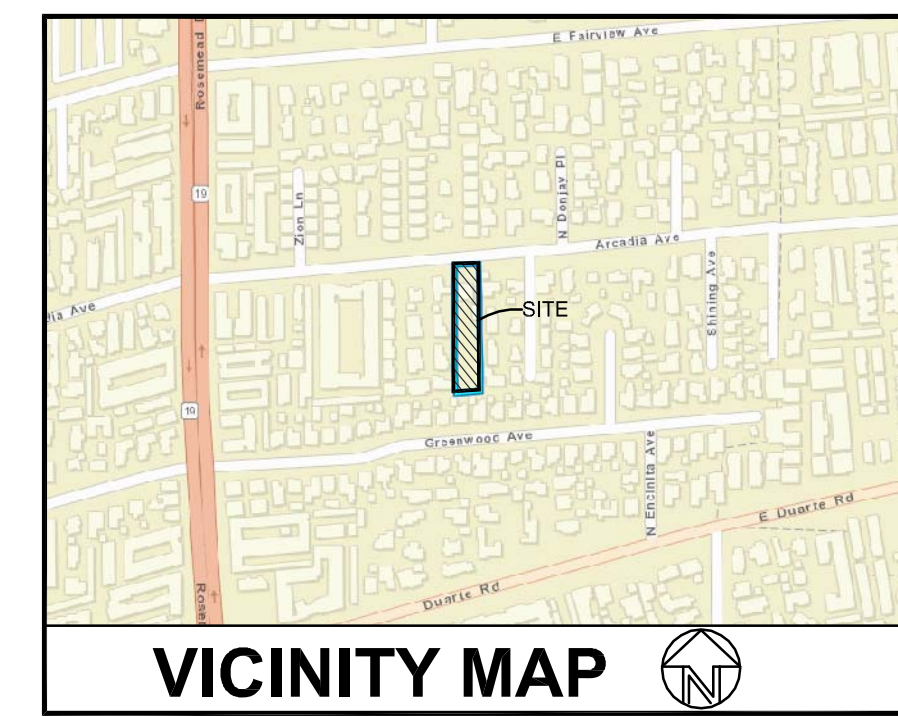
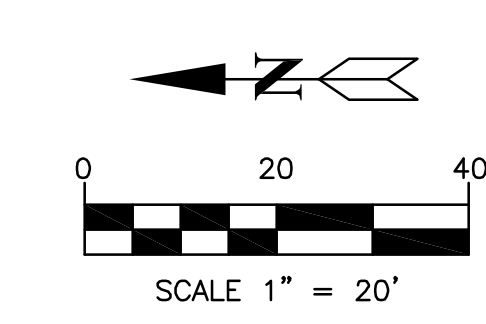
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AS PER MAP RECORDED IN BOOK 40 PAGE 95 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER
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APN: 5379-024-021

**LOS ANGELES DEPARTMENT OF
REGIONAL PLANNING
5/20/25
EXHIBIT MAP TR83480**

LEGENDS & ABBREVIATIONS

- | | | | | | |
|-----|-------|--------------------|--|-------|----------------|
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| FL | | FLOW LINE | | | SHEET FLOW |
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| FF | | FINISHED FLOOR | | | WATER METER |
| FG | | FINISHED GRADE | | | CONCRETE |
| INV | | INVERT ELEVATION | | | LANDSCAPE AREA |
| DWY | | DRIVEWAY APPROACH | | | SEWER LINE |
| (1) | | EXISTING ELEVATION | | | FIRE HYDRANT |
| (1) | | PROPOSED ELEVATION | | | |
| --- | | CENTERLINE | | | |
| --- | | PROPERTY LINE | | | |
| --- | | FLOW LINE | | | |
| --- | | FLOW PATTERN | | | |



ENGINEER:
JACK LEE, RCE 40870
576 E. LAMBERT ROAD,
BREA, CA 92821
TEL: 714.671.1050
FAX: 714.671.1090

UTILITIES:
WATER - EAST PASADENA WATER COMPANY
SEWER - COUNTY OF LOS ANGELES
GAS - SOUTHERN CALIFORNIA GAS CO.
ELECTRICAL - SOUTHERN CALIFORNIA EDISON CO.
TELEPHONE - AT&T / SBC
TRASH - ATHENS DISPOSAL COMPANY
CABLE TV - CHARTER COMMUNICATION CABLE

NOTE:
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PROJECT SUMMARY:
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5003 GOLDEN WEST AVENUE, TEMPLE CITY, CA 91780
626-226-8864

PROJECT ADDRESS: 9072 ARCADIA AVENUE, SAN GABRIEL, CA 91775

PROJECT DESCRIPTION: 5 DETACHED CONDOMINIUM UNITS

EXISTING LOT: 1

PROPOSED LOT: 1

A.P.N.: 5379-024-021

EXISTING ZONING: R-1

PROPOSED ZONING: R-1

LAND USE DESIGNATION: H-9

EXISTING GENERAL PLAN: RESIDENTIAL

COMMUNITY STANDARD DISTRICT: EAST PASADENA-SAN GABRIEL
COMMUNITY STANDARDS DISTRICT

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EXISTING GARAGE TO BE DEMOLISHED = 548.69 S.F.
EXISTING STORAGE TO BE DEMOLISHED = 106.93 S.F.

FLOOR AREA SUMMARY:

UNIT 1 (TYPE A): 2 STORY, 25'-4" HEIGHT
BUILDING COVERAGE: 1,650 SF
4 BED ROOMS, 4-1/2 BATH,
400 SF;
28 SF

UNIT 2&3 (TYPE B): 2 STORY, 25'-4" HEIGHT
BUILDING COVERAGE: 1,636 SF
4 BED ROOMS, 4 BATH,
400 SF;
28 SF

UNIT 4 (TYPE C): 2 STORY, 26'-10" HEIGHT
BUILDING COVERAGE: 1,388 SF
4 BED ROOMS, 3 BATH,
400 SF;
28 SF

UNIT 5 (TYPE D): 2 STORY, 25'-7" HEIGHT
BUILDING COVERAGE: 1,845 SF
4 BED ROOMS + 1 OFFICE ROOM, 4-1/2 BATH,
400 SF;
60 SF

NOTES:

⑥ EXISTING 6' HIGH BLOCK WALL TO REMAIN

⑬ PROPOSED NEW 1' RETAINING WALL WITH 2' BLOCK FENCE WALL, TOTAL H = 3.5'

⑭ PROPOSED NEW 1.5' RETAINING WALL WITH 4.5' BLOCK FENCE WALL, TOTAL H = 6'

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⑱ PROPOSED AREA DRAIN

⑲ PROPOSED RIP-RAP

⑳ PROPOSED 5' WIDE SIDEWALK

㉑ INSTALL STORMTECH CHAMBER INFILTRATION SYSTEM

㉒ PROPOSED DRIVEWAY APPROACH

㉓ PROPOSED PIPE

㉔ OMIT EVERY OTHER BLOCK WALL

EASEMENT NOTE:

⑤ 5' EASEMENT FOR PUBLIC UTILITIES PER BK. 1948, PG. 92, O.R. TO REMAIN

EARTHWORK QUANTITIES:

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EXPORT: 170 CY OVER-EXCAVATION: 1,867 CY

SPECIAL NOTES:
THE QUANTITIES SHOWN HEREON ARE FOR PERMIT AND BONDING
PURPOSES ONLY. THE CONTRACTOR SHALL VERIFY QUANTITIES
PRIOR TO START OF GRADING

HOA NOTE:
HOMEOWNER'S ASSOCIATION SHALL BE ESTABLISHED
TO ENSURE BASIC MAINTENANCE AND INFRASTRUCTURE
DEVELOPMENTS OF ITS SURROUNDINGS.

REQUIRED AND PROPOSED SETBACK:

FRONT SETBACK-- REQUIRED: 34.02' -(20'-0" OR / AVERAGE SETBACK, WHICHEVER IS
GREATER) SEE ATTACHED SETBACK ANALYSIS FOR
REFERENCE

PROPOSED: 34'-1"

SIDE SETBACK-- GROUND FLOOR REQUIRED: 10% OF LOT WIDTH (7'-3")
PROPOSED : 8'-3"

SECOND FLOOR REQUIRED: AFTER 5' FROM PROPERTY LINE,
STRUCTURE OVER 10', SETBACK 1
FOOT EVERY 1 FOOT HEIGHT

PROPOSED: 14'-3"

REAR SETBACK-- REQUIRED: 35'-0"
PROPOSED: 35'-0"

PROPOSED BUILDING HEIGHT: 2 STORY : 25'-4" (TYPE A & B); 26'-10"
(TYPE C); 25'-7"(TYPE D)

BUILDINGS SEPARATION REQUIRED: 20'-0"
BUILDINGS SEPARATION PROPOSED: 20'-0"

FRONT YARD LANDSCAPING CALCULATION:

FRONT YARD AREA: 2,468 SF

DESIGNED SOFTCAPE LANDSCAPING AREA: 1,408 SF (57.5% > MIN. REQUIRED 50%)

REQUIRED AND PROPOSED SETBACK:

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PROPOSED: 35'-0"

PROPOSED BUILDING HEIGHT: 2 STORY : 25'-4" (TYPE A & B); 26'-10"
(TYPE C); 25'-7"(TYPE D)

BUILDINGS SEPARATION REQUIRED: 20'-0"
BUILDINGS SEPARATION PROPOSED: 20'-0"

FRONT YARD LANDSCAPING CALCULATION:

FRONT YARD AREA: 2,468 SF

DESIGNED SOFTCAPE LANDSCAPING AREA: 1,408 SF (57.5% > MIN. REQUIRED 50%)

ATTACHED 2-CAR GARAGE--
FRONT PROCH - 400 SF;
28 SF

UNIT 2&3 (TYPE B): 2 STORY, 25'-4" HEIGHT
BUILDING COVERAGE: 1,636 SF
4 BED ROOMS, 4 BATH,
400 SF;
28 SF

UNIT 4 (TYPE C): 2 STORY, 26'-10" HEIGHT
BUILDING COVERAGE: 1,388 SF
4 BED ROOMS, 3 BATH,
400 SF;
28 SF

UNIT 5 (TYPE D): 2 STORY, 25'-7" HEIGHT
BUILDING COVERAGE: 1,845 SF
4 BED ROOMS + 1 OFFICE ROOM, 4-1/2 BATH,
400 SF;
60 SF

PROPERTY FAR AND COVERAGE SUMMARY:

TOTAL LOT AREA: 26,579 SF

TOTAL FLOOR AREA: 11,550 SF

FAR: 0.4345 - FAR ALLOWED 0.50 (Max.)

TOTAL BUILDING COVERAGE: 8,155 SF (30.68%)

EASEMENT NOTE:

⑤ 5' EASEMENT FOR PUBLIC UTILITIES PER BK. 1948, PG. 92, O.R. TO REMAIN

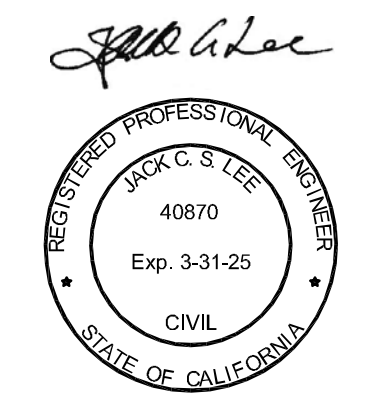
NO OAK TREE ONSITE

NO ENTRANCE GATE PROPOSED

**LACFCD IS NOT TO MAINTAIN
ANY DRAINAGE DEVICES**

South Side of Arcadia Ave	
APN	Setback (Ft)
5379-025-010	18.01
5379-025-009	19.76
5379-025-006	37.88
5379-025-012	40.07
5379-025-011	20.65
5379-025-014 TO -019	39.54
5379-024-038	51.32
5379-024-026	21.78
5379-024-021	49.92
5379-024-029	20.19
5379-024-019	49.77
5379-024-018	33.53
5379-024-041	30.82
5379-024-016	46.31
5379-023-024	38.85
5379-023-023	43.96
5379-023-037	19.98
5379-023-018	21.05
5379-023-016	35.24
5379-023-015	39.59
5379-023-009	61.60
5379-023-038	24.59
Average Setback (Excluding Arcadia 9072)	34.02

AVERAGE FRONT SETBACK
- subtract subject property
= 714.49/21=34.02



BENCHMARK: COUNTY BENCHMARK 1G3589 RDBM TAG IN S CB 2FT W/O BCR @ SW COR DUARTE RD & OAK AVE ELEVATION: 510.183'	PROJECT LOCATION: 9072 ARCADIA AVENUE, SAN GABRIEL, CA 91775	OWNER: E-HIGHLAND (US) CORP/ JIANFEI JI 5003 GOLDEN WEST AVENUE TEMPLE CITY, CA 91780 626-226-8864	DRAWN: PYS CHECKED: DATE: 08/07/2024 JOB NO.: 20-019-041 SCALE: 1" = 20' FILE NAME:	CALLAND ENGINEERING, INC. dba QUARTECH CONSULTANTS 576 E. LAMBERT ROAD, BREA, CA 92821 TEL: (714) 671-1050 FAX: (714) 671-1090	T-1 SHEET 1 OF 1 SHT.
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PROJECT NUMBER

PRJ2021-002634

HEARING DATE

June 3, 2026

REQUESTED ENTITLEMENT(S)Tentative Tract Map No. 83480 (RPPL2021007371)
Administrative Housing Permit No. RPPL2023004361**PROJECT SUMMARY****OWNER / APPLICANT**

Jianfei Ji / Peterzon Sy

MAP/EXHIBIT DATE

May 20, 2025

PROJECT OVERVIEW

Tentative Tract Map No. 83480 is a request to authorize the creation of one multi-family lot with five detached condominium units on 0.6 gross/net acres. The project site fronts Arcadia Avenue, and all five units will be directly accessible via a shared 20-foot-wide private driveway and fire lane that connects to Arcadia Avenue. The project also includes a five-foot-wide walkway, providing direct pedestrian access to all units. All units will have four bedrooms, be two stories and 25 feet high, and range in size from 1,900 to 2,600 square feet. The project also includes an Administrative Housing Permit for the set aside of one affordable unit at the moderate-income level (120 percent of the Area Median Income), and a waiver of the required 85-foot-wide minimum lot width to 72.7 feet wide.

LOCATION

9072 Arcadia Avenue, San Gabriel

ACCESS

Arcadia Avenue

VERY HIGH FIRE HAZARD

No

ASSESSORS PARCEL NUMBER

5379-024-021

SITE AREA

26,579 gross square feet / 0.6 gross acre

26,216.76 net square feet / 0.6 net acres

GENERAL PLAN / LOCAL PLAN

General Plan*

PLANNING AREA

West San Gabriel Valley

SUP DISTRICT5th**LAND USE DESIGNATION**

H9 (Residential 9 - 0 to 9 Dwelling Units Per Net Acre)

ZONE

R-1 (Single-Family Residence - 5,000 Square Feet Net Lot Area)

ZONED DISTRICT

South Santa Anita-Temple City

PROPOSED UNITS

5

MAX DENSITY

6 Units

APPLICABLE STANDARDS DISTRICT[Chapter 22.366 East Pasadena-East San Gabriel](#) (2023)***ENVIRONMENTAL DETERMINATION ("CEQA")**

Class 15 Categorical Exemption – Minor Land Divisions

KEY ISSUES

- Consistency with the General Plan and the Subdivision Map Act
- Satisfaction with the following portions of Title 21 and Title 22 of the Los Angeles County Code:
 - Chapter 21.40 (Tentative Maps)
 - Chapter 22.121 (Inclusionary Housing)
 - Section 22.166.040 (Administrative Housing Permit)
 - Chapter 22.318 (East Pasadena-East San Gabriel Community Standards District)

*Note: The Project was "Deemed Complete" on December 8, 2022, before the adoption of the West San Gabriel Valley Area Plan is not subject to the current ordinances.

CASE PLANNER:

Michelle Lynch, Principal Planner

PHONE NUMBER:

(213) 893 - 7005

E-MAIL ADDRESS:mlynch@planning.lacounty.gov

LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING
DRAFT FINDINGS OF THE REGIONAL PLANNING COMMISSION
AND ORDER
PROJECT NO. PRJ2021-002634
TENTATIVE TRACT MAP NO. 83480 (RPPL2021007371)

RECITALS

1. **HEARING DATE.** The Los Angeles County (“County”) Regional Planning Commission (“Commission”) conducted a duly-noticed public hearing on June 3, 2026, in the matter of Project No. PRJ2021-002634, consisting of Tentative Tract Map No. 83480 (RPPL2021007371) (“TR83480”). TR83480 was considered together with the Administrative Housing Permit No. RPPL2023004361 and together these are referred to collectively as the “Project”.
2. **HEARING PROCEEDINGS.** *Reserved.*
3. **ENTITLEMENT REQUESTED.** The subdivider, Peterzon Sy ("subdivider"), requests TR83480 to create one multi-family lot with five new detached condominium units on 0.6 gross/net acres located at 9072 Arcadia Avenue, San Gabriel, in the unincorporated community of San Gabriel ("Project Site") pursuant to County Code Chapter 21.40 (Tentative Maps).
4. **RELATED ENTITLEMENT.** Administrative Housing Permit No. RPPL2023004361 is a related request for the set aside of one for-sale unit with a maximum affordability of 120 percent Area Median Income (“AMI”). This is to meet the seven percent set aside inclusionary housing requirement for projects within the San Gabriel Valley submarket pursuant to County Code Table 22.121.050-B (Inclusionary Housing).
5. **ENTITLEMENT REQUESTOR.** Unless otherwise apparent from the context, subdivider or successor in interest (“subdivider”) shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
6. **LOCATION.** The Project is located at 9072 Arcadia Avenue within the South Santa Anita-Temple City Zoned District within the West San Gabriel Valley Planning Area ("Project Site").
7. **LAND USE DESIGNATION.** The Project Site is located within H9 (Residential 9 - 0 to 9 Dwelling Units Per Net Acre) land use category of the General Plan. The Project was deemed complete on December 8, 2022, therefore not subject to the adoption of the West San Gabriel Valley Area Plan on March 1, 2025, and any other ordinances adopted after December 8, 2022.
8. **ZONING.** The Project Site is located in the South Santa Anita-Temple City Zoned District, is currently zoned R-1 (Single-Family Residence – 5,000 Square Feet Minimum Required Lot Area), and is within the East Pasadena-East San Gabriel Valley Community Standards District ("CSD").

9. SURROUNDING LAND USES AND ZONING.

LOCATION	GENERAL PLAN LAND USE POLICY	ZONING	EXISTING USES
NORTH	H9, H18 (Residential 18 - 0 to 18 Dwelling Units Per Net Acre)	R-1, R-2 (Two-Family Residences)	Single-Family and Multi-Family Residences
EAST	H9, H18, H30 (Residential 30 - 20 to 30 Dwelling Units Per Net Acre), CG (General Commercial)	R-1, R-2, MXD (Mixed-Use Development)	Single-Family and Multi-Family Residences
SOUTH	H9	R-1	Single-Family and Multi-Family Residences
WEST	H9	R-1	Single-Family and Multi-Family Residences

10. PROJECT AND SITE PLAN DESCRIPTION.

A. Existing Site Conditions

The Project Site is 0.6 net acres in size and consists of one legal parcel. The Project Site is rectangular in shape with flat topography and was developed with an existing single-family dwelling and accessory structures that have since been removed.

B. Site Access

The Project Site is accessible via Arcadia Avenue, a 40-foot-wide public street, to the north. Primary access to the Project Site will be via an entrance/exit on Arcadia Avenue. The Project includes a five-foot-wide walkway throughout the Project Site, providing direct access to all units.

C. Tentative Tract Map and Exhibit Map

The Tentative Tract Map and Exhibit Map dated May 20, 2025, depicts the Project Site with five detached condominium residences proposed in a row accessing the same 20-foot private driveway and fire lane that accesses Arcadia Avenue. The proposed private driveway and fire lane are along the eastern portion of the lot, providing vehicular access to the detached garages. All condominium units are two stories high and include a two-car garage, great room/kitchen, and one bathroom and bedroom located on the ground floor, as well as three bedrooms and three bathrooms on the second floor, totaling between 1,900 square feet and 2,600 square feet. Grading consists of approximately 2,627 total cubic yards (“cy”), including 380 cy cut, 210 cy fill, 170 cy export, and 1,867 cy over excavation.

D. Affordable Housing

The Project proposes a total of five detached condominium units. The Project is subject to the Inclusionary Housing Ordinance (“IHO”) and proposes one for-sale unit with an affordability of 120 percent Area Median Income (AMI) as conditioned by the Los Angeles County Development Authority (“LACDA”), to meet the seven percent set aside requirement for projects within the San Gabriel Valley Area submarket pursuant to Table 22.121.050-B (Inclusionary Housing). Dwelling units that are proposed to be or have been demolished, vacated, or converted from rental to for sale, shall be replaced if the use and density of such units are consistent with zoning or the General Plan, including any applicable Area, Community, or Neighborhood Plan. The Project is not subject to the Rental Replacement Ordinance as the property did not have rental units per County Code 22.119.050 (Requirements).

E. Parking

The Project will provide a total of 10 covered parking spaces provided in garages for residents. Each residential unit will have a two-car garage on the ground floor. Guest parking and bicycle parking are not required.

F. Internal Circulation

Internal circulation and access for the Project will be provided by a single 20-foot-wide private driveway and fire lane. Each garage will have direct access to the private driveway and fire lane. A five-foot-wide landscaped walkway provides connectivity to the front and rear of the property and direct access to all units.

G. Condominium Project

Pursuant to the Subdivision Map Act, condominium units may be leased or sold. Renters of condominium units may not receive sufficient notification when an owner decides to sell the units. In order to provide renters with proper notification, notification is required 180 days prior to termination of tenancy in the event the condominium units are first leased and then later sold.

11. CEQA DETERMINATION.

Staff recommends that this Project qualifies as a Class 15 (Minor Land Divisions) Categorical Exemption pursuant to California Environmental Quality Act (Public Resources Code section 21000, et seq.) (“CEQA”), the State CEQA Guidelines, and the Environmental Document Reporting Procedures and Guidelines for the County, on the basis that the Project involves subdividing four or fewer parcels. An environmental determination (Exhibit D – Environmental Determination) was issued for the Project. The Project will subdivide a flat property, with an average slope that is less than 20 percent, into one parcel, and does not involve a prior subdivision in the last two years. The Project Site fronts a public street and will be served by public water and sewer. The Project is not on a list maintained by the California Department of Toxic Substances Control and the Regional Water Quality Control Board and does not contain any registered historic resources. The Project is also not located near a scenic highway, and there is no reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances, nor result in cumulative impacts.

Therefore, there are no exceptions to the exemption and therefore, the Project is categorically exempt.

12. **COMMUNITY OUTREACH.** Prior to the Commission's public hearing on the Project, the subdivider did not perform any public outreach.

13. **PUBLIC COMMENTS.**

Prior to the publication of the Report to the Commission, the Department of Regional Planning ("LA County Planning") staff received three emails from one constituent in opposition to the project.

14. **AGENCY RECOMMENDATIONS.**

- A. Los Angeles County Subdivision Committee, consisting of LA County Planning and County Departments of Public Works, Fire, Parks and Recreation, and Public Health: Recommended approval of Tentative Tract Map and Exhibit Map dated May 20, 2025.
- B. LACDA has reviewed and cleared the Tentative Tract Map and Exhibit Map dated May 20, 2025.

15. **LEGAL NOTIFICATION.** Pursuant to Section 21.16.070 (Notice of Public Hearing) of the County Code, the community was properly notified of the public hearing by mail, newspaper, the San Gabriel Valley Tribune, and property posting. Additionally, the Project was noticed, and case materials were available on LA County Planning's website. On April 21, 2026, a total of 473 Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 1,000-foot radius from the Project Site, as well as notices to those on the courtesy mailing list for the South Santa Anita-Temple City Zoned District and to any additional interested parties.

16. **DEEMED COMPLETE.** A Project must have a deemed completed application per County Code 21.40.110 (Matters Required to Complete Submittal and Filing). The Project was deemed complete on December 8, 2022, therefore not subject to the adoption of the West San Gabriel Valley Area Plan on March 1, 2025 and any other ordinances adopted after December 8, 2022.

GENERAL PLAN CONSISTENCY FINDINGS

17. **LAND USE POLICY.** The Commission finds that the Project is consistent with the goals and policies of the General Plan because the H9 land use designation is intended for detached residences at a density of nine dwelling units per acre. The Project consists of five detached residential units on 0.6 net acres or 8.3 dwelling units per acre, and is therefore consistent with the General Plan density.

18. **GOALS AND POLICIES.** The Commission finds that the Project is consistent with the following policies of the General Plan and Housing Element:

Goal LU 3: A development pattern that discourages sprawl and protects and conserves areas with natural resources and Significant Ecological Areas.

Policy LU 3.3: Discourage development in undeveloped areas where infrastructure and public services do not exist, or where no major infrastructure projects are planned.

The Project is proposed in an already developed area where additional infrastructure and public services are not required. The Project Site is located in an urbanized area and is an infill project because it is already surrounded by residential development. The Project Site is not located within a Significant Ecological Area, and no natural resources exist on the site.

Policy LU 4: Infill development and redevelopment that strengthens and enhances communities.

The property is located in an established urban neighborhood that is comprised of both single-family and multi-family residential uses of a similar density.

Strategy 2: Ensure Housing Affordability: To accommodate the housing needs of all economic segments of the population, the County must ensure a housing supply that offers a range of choices. A variety of mechanisms should be explored to enhance affordability.

Goal 3: A housing supply that ranges broadly in costs to enable all households, regardless of income, to secure adequate housing.

The Project proposes five detached single-family condominium units; four units will be at market-rate and one unit will be at the moderate-income rate level. The Project provides additional affordable housing choices in a neighborhood of existing single-family and multi-family housing units.

SUBDIVISION AND ZONING CODE CONSISTENCY FINDINGS

19. **PERMITTED USE IN ZONE.** The Commission finds that the Project is consistent with the R-1 zoning classification as single-family residences are permitted in the R-1 Zone pursuant to County Code Section 22.18.030 (Land Use Regulations for Zones R-A, R-1, R-2, R-3, R-4, and R-5).
20. **AREA AND WIDTH.** The Commission finds that the Project is consistent with the standards identified in County Code Sections 21.24.240 (Area and width—Requirements generally). The required minimum lot width per County Code Chapter 22.366 East San Gabriel CSD is 85 feet for lots 13,000 square feet to 19,999 square feet. However, since the Project has an associated AHP and is subject to the IHO, it is allowed a reduction of development standards. The existing lot width is 72.7 feet, less than the minimum lot width of 85 feet. Therefore, the AHP allows a waiver for the reduction of the lot width to 72.7 feet from the required 85 feet.
21. **MINIMUM FRONTAGE.** The Commission finds that the Project is consistent with the standards identified in County Code Section 21.24.300 (Minimum Frontage) and

22.318.070 (Zone Specific Development Standards). The Project street frontage is 72.7 feet, and the required minimum is 70 feet.

- 22. REQUIRED YARDS.** The Commission finds that the Project is consistent with the standards identified in County Code Section 22.18.040.B (Development Standards for Residential Zones) and CSD. The CSD requires the minimum side yard width shall be 10 percent of the average lot width, but no less than five feet for a lot with an average lot width less than 50 feet, a 35-foot rear yard when the lot size is between 13,000 square feet and 19,999 square feet and the minimum front yard depth be the average depth of front yards on the same side of the street on the same block. The proposed Project will provide 8.5-inch side yards, a 35-foot rear yard, and a 34-foot front yard.
- 23. HEIGHT.** The Commission finds that the Project is consistent with the CSD where the residential units will be subject to the 30-foot height limit and limited to two stories, as identified in County Code 22.318.070 (Zone Specific Development Standards). The Project's proposed building height is 25 feet and 3.5 inches tall, and two stories.
- 24. DISTANCE BETWEEN BUILDINGS.** The Commission finds that the Project is consistent with the standard identified in County Code Section 22.110.050 (Distances Between Buildings) and the County Code Chapter 22.318 (East Pasadena-East San Gabriel Valley CSD). The CSD requires a minimum distance of 20 feet between all main residential buildings on the same lot. All proposed units maintain a proposed separation of 20 feet.
- 25. FENCES AND WALLS.** The Commission finds that the Project is consistent with the standard identified in County Code Section 22.110.070 (Fences and Walls). The requirement is 3.5 feet in the front yard and six feet for the side and rear property lines. The existing rear walls will be maintained at six feet, and the proposed front yard wall is 3.5 feet, while the proposed side yard walls will be maintained at six feet.
- 26. PARKING.** The Commission finds that the Project is consistent with the standard identified in County Code Chapter 22.112 (Parking) as five garages that accommodate two cars each. Guest spaces and Bicycle parking spaces are not required.
- 27. GRADING.** The Commission finds that the Project is consistent with the standard identified in County Code Section 21.40.040 (Items Required for Tract Maps). The total amount of grading proposed is 2,627 total cubic yards("cy"), including 380 cy cut, 210 cy fill, 170 cy export, and 1,867 cy over excavation.
- 28. COMMUNITY STANDARDS DISTRICT ("CSD").** The Commission finds that the Project is consistent with the standards identified in County Code Chapter 22.318 (East Pasadena-East San Gabriel Valley CSD). Height, distance, and building separations as indicated in the previous findings are consistent with the CSD requirements.
- 29. TREE PLANTING.** The Commission finds that the Project is consistent with the standards identified in County Code Section 21.32.195 (On-Site Trees) as there must

be one tree for every 25 feet of frontage. The Project will provide three trees on site based on the 72-foot frontage.

30. **INCLUSIONARY HOUSING.** The Commission finds that the Project is consistent with the IHO because the Project includes one affordable unit based on the submarket area and project size. The Project provides one for-sale affordable unit at a maximum 120 percent AMI.
31. **DEEMED COMPLETE.** The Commission finds that the Project was deemed complete on December 8, 2022, before the adoption of the WSGVAP and therefore subject to codes and ordinances in place at the time of the deemed complete status.

TENTATIVE TRACT MAP SPECIFIC FINDINGS

32. **The Commission finds that the map is consistent with the goals and policies of the General Plan.** In particular, the project will satisfy Goal LU3, the Project is proposed in an already developed area where additional infrastructure and public services are not required. The Project Site is located in an urbanized area and is an infill project because it is already surrounded by residential development. The Project Site is not located within a Significant Ecological Area, and no natural resources exist on the site. Also, LU 4, infill development, and redevelopment that strengthen and enhance communities. The Project site is located in an established urban low-density neighborhood within walking distance to bus stops and commercial services and uses.
33. **The Commission finds that the design or improvement of the proposed subdivision is consistent with the goals and policies of the General Plan.** The Commission finds that the site design and improvements comply by meeting required setbacks, building separations, access, and parking to accommodate units of the R-1 zoning and the CSD in the existing residential neighborhood with a mix of single-family and multi-family residences.
34. **The Commission finds that the site is physically suitable for this type of development.** The Commission finds that the site is physically suitable for the type of development. The Project complies by providing enough area to accommodate units while meeting setbacks and all development standards of the R-1 zoning and the CSD in the existing residential neighborhood with a mix of single-family and multi-family residences.
35. **The Commission finds that the site is physically suitable for the proposed density of development.** The Project is consistent with the General Plan and complies with all development standards of the prescribed R-1 zoning as detailed above.
36. **The Commission finds the design of the subdivision, or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.** The subject property is not located within an adopted Significant Ecological Area and will not affect any stream courses or high-value riparian habitat.

37. **The Commission finds that the design of the subdivision or type of improvements is not likely to cause serious public health problems.** Sewage disposal, storm drainage, fire protection, and geologic and soils factors are addressed in the recommended conditions of approval, and the project will be connected to public water and sewer.
38. **The Commission finds that the design or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of the property within the proposed subdivision.** The design and development as set forth in the conditions of approval and shown on the tentative map and exhibit map provide adequate protection for any such easements.

ENVIRONMENTAL FINDINGS

39. The Commission finds that the Project is exempt from the California Environmental Quality Act pursuant to State CEQA Guidelines section 15315, Class 15 (Minor Land Divisions) Categorical Exemption pursuant to California Environmental Quality Act (Public Resources Code section 21000, et seq.) (“CEQA”), the State CEQA Guidelines, and the Environmental Document Reporting Procedures and Guidelines for the County, on the basis that the Project involves subdividing four or less parcels. The Project will subdivide a flat property, with an average slope that is less than 20 percent, into one parcel, and does not involve a prior subdivision in the last two years. The Project Site fronts a public street and will be served by public water and sewer. The Project is not on a list maintained by the California Department of Toxic Substances Control and the Regional Water Quality Control Board and does not contain any registered historic resources. The Project is also not located near a scenic highway, and there is no reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances, nor result in cumulative impacts. Therefore, there are no exceptions to the exemption, and therefore, the project is categorically exempt.

ADMINISTRATIVE FINDINGS

40. **HOUSING ACCOUNTABILITY ACT.** The Commission finds that the Project is considered a housing development that is consistent with the General Plan and Zoning and would not have a specific adverse impact upon public health or safety as described in the tentative map and environmental findings.
41. **PUBLIC MEETINGS.** Commission finds that pursuant to SB330, the number of publicly held meetings since January 1, 2020, does not exceed the five-meeting limit. One meeting occurred on the following date:
- Regional Planning Commission Hearing held on June 3, 2026
42. **LOCATION OF DOCUMENTS.** The location of the documents and other materials constituting the record of proceedings upon which the Commission’s decision is based in this matter is at LA County Planning, 13th Floor, Hall of Records, 320 West Temple

Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Subdivisions Section, LA County Planning.

BASED ON THE FOREGOING, THE COMMISSION FINDS AND CONCLUDES THAT:

- A. The map is consistent with the goals and policies of the General Plan.
- B. The design or improvement of the proposed subdivision is consistent with the goals and policies of the General Plan.
- C. The site is physically suitable for this type of development since the Project complies with all development standards of the R-1 zoning.
- D. The site is physically suitable for the proposed density of development since the Project is consistent with the General Plan, within the maximum allowable density, and complies with all development standards of the prescribed R-1 zoning.
- E. The design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.
- F. The design of the subdivision or type of improvements is not likely to cause serious public health problems since sewage disposal, storm drainage, fire protection, and geologic and soils factors.
- G. The design or the type of improvements will not conflict with easements, acquired by the public at large, for access through or use of property within the proposed subdivision.

THEREFORE, THE COMMISSION:

1. Finds that the Project is exempt from the California Environmental Quality Act ("CEQA") pursuant to State CEQA Guidelines section 15315 (Class 15, Minor Land Divisions) categorical exemption); and
2. Approves **TENTATIVE TRACT MAP NO. 83480 (RPPL2021007371)**, subject to the attached conditions.

JH:EGA:ML

LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING

DRAFT CONDITIONS OF APPROVAL
PROJECT NO. PRJ2021-002634
TENTATIVE TRACT MAP NO. 83480 (RPPL2021007371)

PROJECT DESCRIPTION

The project is a request to create one multi-family lot with five new detached condominium units on 0.6 net acres, subject to the following conditions of approval.

GENERAL CONDITIONS

1. **Subdivider.** Unless otherwise apparent from the context, the term “Subdivider” shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
2. **Affidavit of Acceptance.** This grant shall not be effective for any purpose until the Subdivider, and the owner of the subject property if other than the Subdivider, have filed at the office of the Los Angeles County (“County”) Department of Regional Planning (“LA County Planning”) their affidavit stating that they are aware of and agree to accept all of the conditions of this grant. Notwithstanding the foregoing, this Condition No. 2 and Condition Nos. 4, 6, and 7 shall be effective immediately upon the date of final approval of this grant by the County.
3. **Date of Final Approval.** Unless otherwise apparent from the context, the term “date of final approval” shall mean the date the County's action becomes effective pursuant to Section 21.56.010 of the County Code as provided in the Subdivision Map Act Section 66452.5 for Tentative Maps.
4. **Indemnification.** The Subdivider shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this subdivision approval, which action is brought within the applicable time period of Government Code Section 66499.37 or any other applicable limitations period. The County shall promptly notify the Subdivider of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the Subdivider of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the Subdivider shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
5. **Invalidation.** If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the subdivision shall be void and the privileges granted hereunder shall lapse.
6. **Litigation Deposit.** In the event that any claim, action, or proceeding as described above is filed against the County, the Subdivider shall within 10 days of the filing make an initial deposit with LA County Planning in the minimum amount of \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in LA County Planning's cooperation in the

defense, including but not limited to, depositions, testimony, and other assistance provided to the Subdivider or the Subdivider's counsel.

- A. If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Subdivider shall deposit additional funds sufficient to bring the balance to the minimum required amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.
 - B. At the sole discretion of the Subdivider, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the Subdivider according to County Code Section 2.170.010 (Fees for Providing County Records).
7. **Expiration. Tentative Tract Map No. 83480 shall expire on June 3, 2028.** The Hearing Officer may grant one (or more) time extensions to the terms of approval of the tentative map. If requested, time extension(s) shall be requested in writing and with the payment of the applicable fee prior to such expiration date. The total number of extensions shall not exceed the maximum number of extensions authorized by the Subdivision Map Act.
 8. **Exhibit Map.** The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit Map. If changes to any of the plans marked Exhibit Map are required as a result of instruction given at the public hearing, a modified Exhibit Map shall be submitted to LA County Planning by **August 3, 2026**.
 9. **Revisions to Exhibit Map.** In the event that subsequent revisions to the approved Exhibit Map are submitted the Subdivider shall submit the proposed plans to the Director of LA County Planning ("Director") for review and approval. All revised plans must substantially conform to the originally approved Exhibit Map. All revised plans must be accompanied by the written authorization of the property owner(s) and the applicable fee for such revision.
 10. **Conditions Compliance.** The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the Subdivider to cease any development or activity not in full compliance shall be a violation of these conditions. No provision of any easement of any other encumbrance on the property shall exempt the Subdivider from compliance with these conditions and applicable regulations.
 11. **Inspection Fees.** If inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the Subdivider shall be financially responsible and shall reimburse LA County Planning for all enforcement efforts necessary to bring the subject property into compliance. The amount charged for each inspection shall be \$470.00 per inspection, or the current recovery cost established

by LA County Planning at the time any inspection(s) is/are required, whichever is greater. Inspections may be unannounced. Inspections may be conducted utilizing any available technologies, including, but not limited to, unmanned aircraft systems (UAS). Use of an UAS requires the consent of the Subdivider pursuant to LA County Planning's UAS policy, which may be updated from time to time, and which shall be provided to the Subdivider upon request.

12. **Library Facilities Mitigation Fees.** Prior to the issuance of any building permit(s), the Subdivider shall remit all applicable library facilities mitigation fees to the County Librarian and pay the fees in effect at the time of payment, pursuant to Chapter 22.264 of the County Code. Questions regarding fee payment can be directed to the County Librarian at (562) 940-8430. The Subdivider shall provide proof of payment upon request from LA County Planning.
13. **Revocation.** Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238 (Modifications and Revocations). Failure of the Subdivider to cease any development or activity not in full compliance shall be a violation of these conditions and result in revocation.
14. **County Fire Code.** All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of the County Fire Department ("Fire").
15. **County Public Works Requirements.** All development pursuant to this grant shall conform with the requirements of County Public Works ("Public Works") to the satisfaction of said department.
16. **Compliance to County Code Title 21 and Title 22.** All development pursuant to this grant shall comply with the requirements of Title 21 (Subdivisions) and Title 22 (Planning and Zoning) of the County Code and of the specific zoning of the subject property, unless specifically modified by this grant, as set forth in these conditions, including the approved Tentative Tract Map and Exhibit Map, or an approved Amendment Map/Amended Exhibit Map.
17. **Maintenance.** The Subdivider shall maintain the subject property in a neat and orderly fashion. The Subdivider shall maintain free of litter all areas of the premises over which The Subdivider has control. All structures, walls and fences open to public view shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by LA County Planning. In the event of graffiti or other extraneous markings occurring, the Subdivider shall remove or cover said markings, drawings, or signage within 48 hours of such notification, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

TENTATIVE TRACT MAP SPECIFIC CONDITIONS

18. **Grant.** This grant shall authorize the creation of one multi-family lot with five new condominium units as depicted on the Tentative Tract Map and Exhibit Map dated May 20, 2025.
19. **Recommended Conditions.** Except as expressly modified herein, this approval is subject to all recommended conditions listed in the attached Subdivision Committee Reports (Tentative Tract Map dated May 20, 2025), consisting of letters and reports from Public Works, Fire, and County Departments of Parks and Recreation, and Public Health.
20. **Grading.** The Subdivider shall not obtain any grading permit for the project prior to the recordation of the final map, unless otherwise authorized by the Director.

PRIOR TO RECORDATION OF A FINAL MAP

Affordable Housing

21. **Affordable Housing.** The Subdivider shall comply with the Los Angeles County Development Authority's ("LACDA") conditions of approval dated February 3, 2026, attached.
 - a. The income-restricted unit shall be indistinguishable in exterior and interior design from the non-restricted units within the project in terms of appearance, materials, and finished quality. The income restricted unit shall have the same number of bedrooms as the non-restricted units at the project. In a development with a variety of bedroom counts per unit, the percentage of income-restricted unit with a particular number of bedrooms shall be equal to the percentage of the non-restricted units at the project with the same number of bedrooms.
 - b. The income-restricted unit shall be dispersed throughout the project equitably and be no less attractive or desirable on average (whether because of convenient access or amenities) than the other non-restricted units.
 - c. An affordable housing covenant related to the income-restricted units shall be approved and recorded within one hundred eighty (180) days of the tentative tract map approval.
 - d. A one-time compliance monitoring fee will be collected for each income-restricted unit at the time of covenant recordation. Monitoring will include annual owner certification.
 - e. All affordable units, including voluntary or proffered units, must align with the income categories as defined in Title 22 of the County Code. Under no circumstance should any affordable unit, including voluntary/proffered units, exceed 120 percent Area Median Income ("AMI") as defined by HCD's income and rent limits.

- f. The affordable housing covenant for homeownership projects shall include provisions restricting the initial sale to eligible buyers and requiring an equity sharing agreement with the County that states the terms outlined in County Code Section 22.166.070.3.d. (Covenant and Agreement). All income-restricted units, regardless of if they are voluntary/proffered or approved under the County's Density Bonus and/or Inclusionary Housing ordinances, are subject to the LACDA's equity sharing program and guidelines.
- g. The initial sales price of the income-restricted units in homeownership projects will be determined by LACDA's Affordable Sales Price Calculator (subject to be updated and changed periodically), available on LA County Planning's website.
- h. The affordable housing covenant is a land use covenant and must be senior to all deeds of trust.

Tree Planting

- 22. **Tree Planting.** The Subdivider shall submit a tree planting plan to the Director for review and approval, depicting the planting location, size and species of the tree plantings required by this grant. The Subdivider shall post a bond guaranteeing performance of work with Public Works or provide other proof of plantings to the satisfaction of the Director. A total of three trees must be planted.

Condominiums

- 23. **Condominium Project Details.** The Subdivider shall place a note or notes on the final map, to the satisfaction of LA County Planning, that this subdivision is approved as a condominium project for a total of five residential units whereby the owners of the units of air space will hold an undivided interest in the common areas, which common areas will in turn provide the necessary access and utility easements for all of the units.
- 24. **Covenant and Agreement for Condominium Project.** To provide renters with proper notice, notice is required 180 days prior to termination of tenancy in the event the condominium units are first leased and later sold. Before final map recordation, the Subdivider shall submit a draft covenant and agreement to provide tenants 180 days written notification of the intention to sell units prior to termination of tenancy due to the sale of condominium units. The Subdivider shall record said covenant and agreement concurrently with the recordation of the final map.

Covenants, Conditions, and Restrictions ("CC&Rs")

- 25. The Subdivider shall submit a draft copy of the project's Covenants, Conditions and Restrictions ("CC&Rs") to the Director for review and approval. A copy of these conditions of approval shall be attached to the CC&Rs and made a part thereof. Those provisions in the CC&Rs required by these conditions shall be identified in the CC&Rs as such and shall not be modified in any way without prior authorization from the Director.

26. The Subdivider shall provide in the CC&Rs a method for the continuous maintenance of the common areas, including but not limited to, private driveways and fire lanes, walkways, lighting system along all walkways, landscaping (including all front yard trees and street trees), irrigation systems, walls and fences , to the satisfaction of the Director.
27. The Subdivider shall reserve in the CC&Rs the right for all residents and their guests within the condominium project to use the private driveways and fire lanes for access into and out of the subdivision.

Driveway Conditions

28. The private driveways shall be labeled as Private Driveway and Fire Lane on the final map.
29. The Subdivider shall construct or bond with Public Works for the private driveway and fire lane, complying with paving design and widths, as depicted on the approved Exhibit Map dated May 20, 2025 or an Amended Exhibit Map approved by the Director.
30. The private driveway shall not be gated. Gated vehicular access shall be listed as a prohibition within the CC&Rs.
31. Prior to recordation of the final map, the Subdivider shall post on private driveways: "No Parking-Fire Lane", unless designated parking otherwise permitted. The Subdivider shall provide for continued enforcement in the CC&Rs. The Subdivider shall submit a draft copy of the CC&Rs to LA County Planning for review and approval.

Attachments:

Exhibit D-1 Subdivision Committee Report (pages 1- 16)

Exhibit D-2 LACDA Letter

The following report consisting of 9 pages are the recommendations of Public Works. The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

1. Details and notes shown on the tentative map are not necessarily approved. Any details or notes which may be inconsistent with requirements of ordinances, general conditions of approval, or Department policies must be specifically approved in other conditions, or ordinance requirements are modified to those shown on the tentative map upon approval by the Advisory Agency.
2. Easements are tentatively required, subject to review by the Director of Public Works to determine the final locations and requirements.
3. Easements shall not be granted or recorded within areas proposed to be granted, dedicated, or offered for dedication for public streets, highways, access rights, building restriction rights, or other easements until after the final map is filed with the Registrar-Recorder/County Clerk's Office. If easements are granted after the date of tentative approval, a subordination must be executed by the easement holder prior to the filing of the final map.
4. In lieu of establishing the final specific locations of structures on each lot/parcel at this time, the owner, at the time of issuance of a grading or building permit, agrees to develop the property in conformance with the County Code and other appropriate ordinances such as the Building Code, Plumbing Code, Grading Ordinance, Highway Permit Ordinance, Mechanical Code, Zoning Ordinance, Underground of Utilities Ordinance, Water Ordinance, Sanitary Sewer and Industrial Waste Ordinance, Electrical Code, and Fire Code. Improvements and other requirements may be imposed pursuant to such codes and ordinances.
5. Adjust, relocate, and/or eliminate lot lines, lots, streets, easements, grading, geotechnical protective devices, and/or physical improvements to comply with ordinances, policies, and standards in effect at the date the County determined the application to be complete all to the satisfaction of Public Works.
6. All easements existing at the time of final map approval must be accounted for on the approved tentative map. This includes the location, owner, purpose, and recording reference for all existing easements. If an easement is blanket or indeterminate in nature, a statement to that effect must be shown on the tentative map in lieu of its location. If all easements have not been accounted for, submit a corrected tentative map to the Department of Regional Planning for approval.
7. If applicable, quitclaim or relocate easements running through proposed structures.

8. Prior to final approval of the tract/parcel map submit a notarized affidavit to the Director of Public Works, signed by all owners of record at the time of filing of the map with the Registrar-Recorder/County Clerk's Office, stating that any proposed condominium building has not been constructed or that all buildings have not been occupied or rented and that said building will not be occupied or rented until after the filing of the map with the Registrar-Recorder/County Clerk's Office.
9. Place standard condominium notes on the final map to the satisfaction of Public Works.
10. Label driveways and multiple access strips as "Private Driveway and Fire Lane" and delineate on the final map to the satisfaction of Public Works and Fire Department.
11. Reserve reciprocal easements for drainage, ingress/egress, sewer, water, utilities, right to grade, and maintenance purposes, in documents over the common private driveways to the satisfaction of Public Works.
12. Remove existing buildings prior to final map approval. Demolition permits and final sign-off from the building inspector are required from the Building and Safety office.
13. A final tract map must be processed through the Director of Public Works prior to being filed with the Registrar-Recorder/County Clerk's Office.
14. Prior to submitting the tract map to the Director of Public Works for examination pursuant to Section 66442 of the Government Code, obtain clearances from all affected Departments and Divisions, including a clearance from the Subdivision Mapping Section of the Land Development Division of Public Works for the following mapping items; mathematical accuracy; survey analysis; and correctness of certificates, signatures, etc.
15. A final guarantee will be required at the time of filing of the final map with the Registrar-Recorder/County Clerk's Office.
16. Within 30 days of the approval date of this land use entitlement or at the time of the first plan check submittal, the applicant shall deposit the sum of \$5,000 Public Works to defray the cost of verifying conditions of approval for the purpose of issuing final map clearances.



900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
WWW.DPW.LACOUNTY.GOV

TRACT NO.: 83480

TENTATIVE MAP DATE: 05/20/2025

EXHIBIT MAP DATE: 05/20/2025

HYDROLOGY UNIT CONDITIONS OF APPROVAL

Prior to Improvement Plans Approval:

1. Comply with hydrology study, which was approved on 11/20/2024, or the latest revision, to the satisfaction of the Department of Public Works.

Review by: _____

A handwritten signature in black ink, appearing to be 'AM' or similar initials.

Alex Mikhailpoor

Date: 05/21/2025

Phone: (626) 458-4921

PCA LX001129/A863
EPIC LA RPPL2021007371
Telephone: (626) 458-4925

Los Angeles County Public Works
Geotechnical and Materials Engineering Division
GEOLOGIC AND GEOTECHNICAL ENGINEERING REVIEW SHEET
900 S. Fremont Avenue, Alhambra, CA 91803

Tentative Tract	83480	Tent./Ex. Map Dated	05/20/2025	Parent Tract	---
Grading By Subdivider? [Y]	1,867 yd ³	Location	San Gabriel		
Geologist	---	Subdivider	Jianfei Ji		
Soils Engineer	---	Engineer/Arch.	Calland Engineering, Inc.		

Review No. 3:

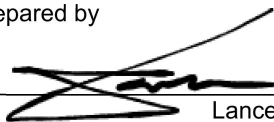
Geologic Report(s) Dated: ---
 Soils Engineering Report(s) Dated: ---
 Geotechnical Report(s) Dated: ---
 References: ---

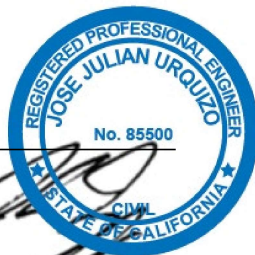
TENTATIVE MAP FEASIBILITY IS RECOMMENDED FOR APPROVAL FROM A GEOTECHNICAL STANDPOINT


THE FOLLOWING INFORMATION IS APPLICABLE TO THIS DIVISION OF LAND:

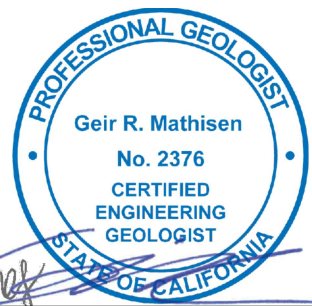
- The Final Map does **not** need to be reviewed by the Geotechnical and Materials Engineering Division.
- Geotechnical report(s) may be required prior to approval of grading or building plans. Report(s) must comply with the provisions of the County of Los Angeles Department of Public Works *Manual for Preparation of Geotechnical Reports*. The Manual is available at: <http://dpw.lacounty.gov/gmed/permits/docs/manual.pdf>.

Prepared by


 Lance Narcida
 Geotechnical Section




 Vanessa Torres
 Geology Section



Date 06/03/2025

NOTICE: Public safety, relative to geotechnical subsurface exploration, shall be provided in accordance with current codes for excavations, inclusive of the Los Angeles County Code, Chapter 11.48, and the State of California, Title 8, Construction Safety Orders.
 83480, San Gabriel, 2025-06-03, TM-4-A

1. Approval of this map pertaining to grading is recommended.

The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

REQUIREMENTS PRIOR TO GRADING PLAN APPROVAL:

2. Provide approval of:
 - a. The latest hydrology study by the Storm Drain and Hydrology Section of Land Development Division.
 - b. The grading plan by the Geotechnical & Materials Engineering Division (GMED).

REQUIREMENTS PRIOR TO FINAL MAP RECORDATION:

3. Submit a grading plan for approval. The grading plan must show and call out the following items, including but not limited to: construction of all drainage devices and details, paved driveways, elevation and drainage of all pads, SUSMP and LID devices (fill in whichever is applicable), and any required landscaping and irrigation not within a common area or maintenance easement. Acknowledgement and/or approval from all easement holders may be required.



Name Nargiss Majrooh Date 6/4/2025 Phone (626) 458-4921
\\pw01\pwpublic\ldpub\SUBPCHECK\Plan Checking Files\Tract Map\TR 83480\RPPL2021007371\2025-05-21 Submittal\Division
Comments\GR\Tentative Map Conditions - TR 83480 - REV 3.docx

TRACT NO. 83480

TENTATIVE MAP DATED 05-20-2025
EXHIBIT MAP DATED 05-20-2025

The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

1. Construct driveway approach on Arcadia Avenue to meet current ADA standards to the satisfaction of Public Works.
2. Construct standard curb, gutter, green strip and sidewalk along the property frontage to the satisfaction of Public Works. Relocate any affected utilities.
3. Repair and replace all damaged road improvement along the property frontage on Arcadia Avenue to Public Works satisfaction
4. Underground all new utility lines to the satisfaction of Public Works
5. Provide and maintain 10' x 10' pedestrian sight triangles from all driveways to the back of the sidewalk. This means there shall be no solid structures such as fences, walls, or landscaping more than 3.5' high within the pedestrian sight triangles.
6. Plant street trees along the property frontage on Arcadia Avenue to the satisfaction of Public Works. Contact Public Works' Road Maintenance Division, Maintenance District 1 office, at (626) 337-1277 to obtain the desirable tree species
7. If any drainage devices are to be constructed, execute a covenant agreement
8. Comply with all street lighting requirements per the attached Traffic Safety and Mobility Division memo dated 08/23/2023.

Prepared by Ambria Vasquez
tr83480r *AV*

Phone (626) 458-4921

Date 05-27-2025

**LOS ANGELES COUNTY PUBLIC WORKS
TRAFFIC SAFETY AND MOBILITY DIVISION
DEVELOPMENT REVIEW - STREET LIGHTING REQUIREMENTS**

Date: 8/23/2023

TO: Aracely Lasso
Road and Grading Section
Land Development Division

Attention Jose Cruz

FROM: Inez Yeung
Street Lighting Section
Traffic Safety and Mobility Division

Prepared by Danny Le

STREET LIGHTING REQUIREMENTS

RPPL2021007371 9072 EAST ARCADIA AVENUE TR 83480

Project is located within County Lighting Maintenance District 1687 (CLMD 1687) and annexation is not required.

Provide streetlights on concrete poles with underground wiring on all streets and highways within TR/PM/L - _____ and around to the satisfaction of Public Works or as modified by Public Works. The streetlights shall be designed as a County-owned and maintained system. Submit street lighting plans along with existing and/or proposed underground utilities plans to Traffic Safety and Mobility Division, Street Lighting Section, for processing and approval.

Provide streetlight(s) on concrete pole(s) with underground wiring along the property frontage on _____ to the satisfaction of Public Works or as modified by Public Works. The streetlight(s) shall be designed as a SCE-owned and maintained system. Submit street lighting plans along with existing and/or proposed underground utilities plans to Traffic Safety and Mobility Division, Street Lighting Section, for processing and approval.

Provide streetlights on concrete poles with underground wiring on non-gated "private and public future" street(s) along the property frontage on _____ to the satisfaction of Public Works or as modified by Public Works. The streetlights shall be designed as a County-owned and maintained system. Provide centerline of 16' wide easement to the County of Los Angeles for streetlight and auxiliary device purposes and an easement for streetlight and auxiliary device ingress and egress (over the entire road). Submit street lighting plans along with existing and/or proposed underground utilities plans to Traffic Safety and Mobility Division, Street Lighting Section, for processing and approval.

Provide streetlights on concrete poles with underground wiring on gated "private and future" street(s) _____ to the satisfaction of Public Works or as modified by Public Works. The streetlights shall be designed as Southern California Edison owned and maintained system. The operation and maintenance of the streetlights shall remain the responsibility of the owner/developer/Home Owners Association until such time as the street(s) are accepted for maintenance by the County. Assessments will be imposed on the development served by gated "private and future" street(s) as a result of streetlight benefits derived from existing or future streetlights on adjacent public roadways.

New streetlights are not required.

The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

1. The subdivider shall install separate house laterals to the existing sewer main line in Arcadia Ave to serve each building in the subdivision.
2. A sewer area study for the proposed subdivision (PC12661AS, dated 06-08-2023) was reviewed and approved. A Will Serve letter from the County Sanitation District indicating adequate capacity exists in the trunk line and treatment plant was obtained prior to approval of the sewer area study. No additional mitigation measures are required. The sewer area study shall be invalidated should there be an increase in the total number of dwelling units, an increase in the density, dwelling units occur on previously identified building restricted lots, a change in the proposed sewer alignment, an increase in the tributary sewershed, a change in the sewer connection points, or the adoption of a land use plan or a revision to the current plan. A revision to the approved sewer area study may be allowed at the discretion of the Director of Public Works. The approved sewer area study shall remain valid for two years from the date of sewer area study approval. After this period of time, an update of the area study shall be submitted by the applicant if determined to be warranted by Public Works.

MT

Prepared by Mike Tran
tr83480s-rev3.doc

Phone (626) 458-4921

Date 06-10-2025

TRACT NO. 83480

TENTATIVE MAP DATED 05-20-2025
EXHIBIT MAP DATED 05-20-2025

The subdivision shall conform to the design standards and policies of Public Works, in particular, but not limited to the following items:

1. A water system maintained by the water purveyor, with appurtenant facilities to serve all buildings in the land division, must be provided. The system shall include fire hydrants of the type and location (both on-site and off-site) as determined by the Fire Department. The water mains shall be sized to accommodate the total domestic and fire flows.
2. The will serve letter issued by “California American Water”, dated May 17, 2023 will expire on May 17, 2024 it shall be sole responsibility of the applicant to renew the Will Serve letter upon expiration and abide by all requirements of the water purveyor.

Prior to obtaining the building permit from the Building and Safety Office:

3. Submit landscape and water efficient plans for each open space lot in the land division, with landscape area greater than 500 square feet, in accordance with the Water Efficient Landscape Ordinance.

Prepared by Ambria Vasquez
tr83480w

AV

Phone (626) 458-4921

Date 05-27-2025

**"MAJOR LAND DIVISION
TENTATIVE TRACT MAP NUMBER 83480
(FOR CONDOMINIUM PURPOSES)
LOCATED IN THE UNINCORPORATED TERRITORY OF
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
EXHIBIT MAP"**

A PORTION OF LOT 43 OF TRACT NO 3747, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA,
AS PER MAP RECORDED IN BOOK 40 PAGE 95 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER
OF SAID COUNTY.

APN: 5379-024-021

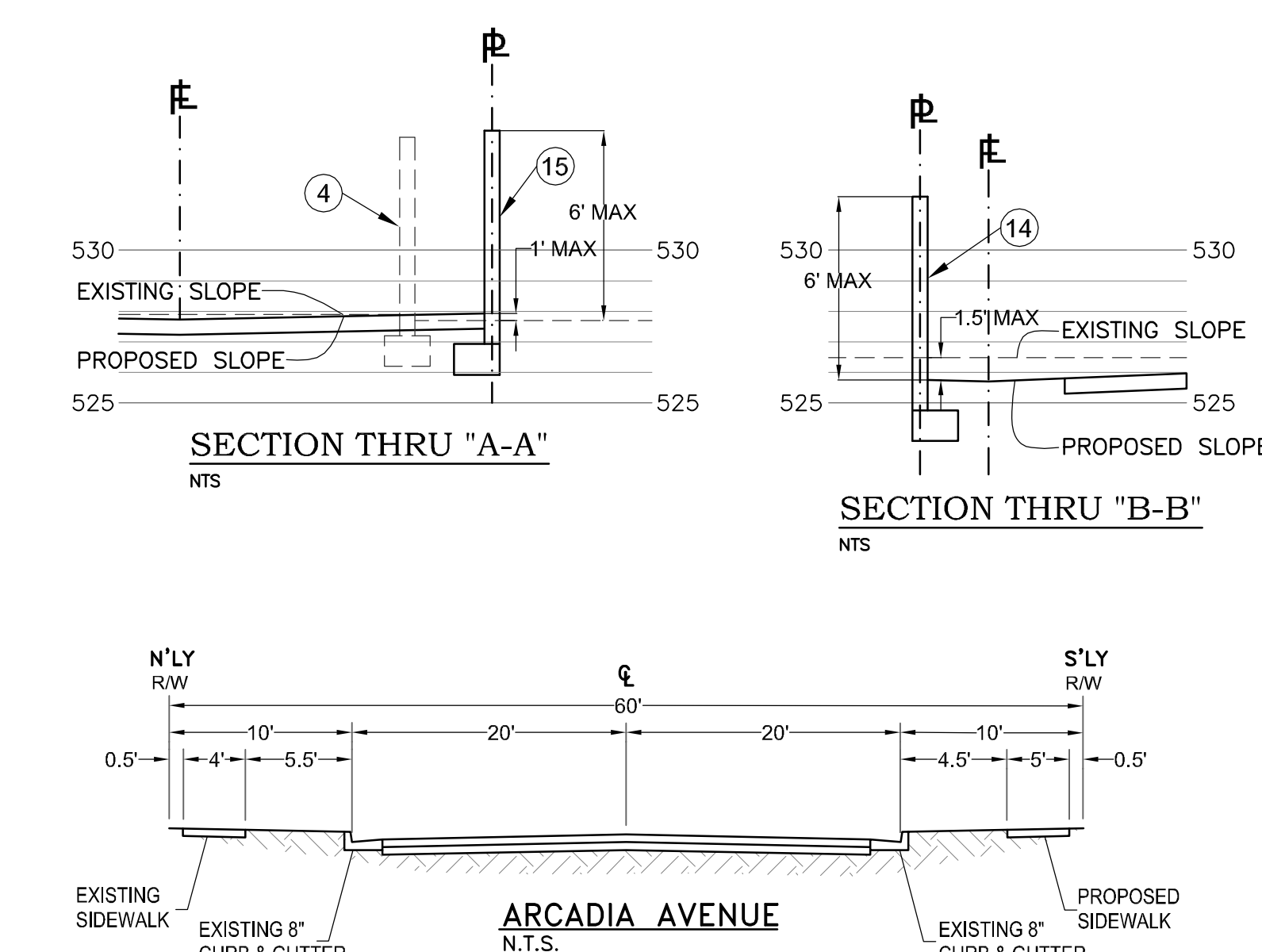
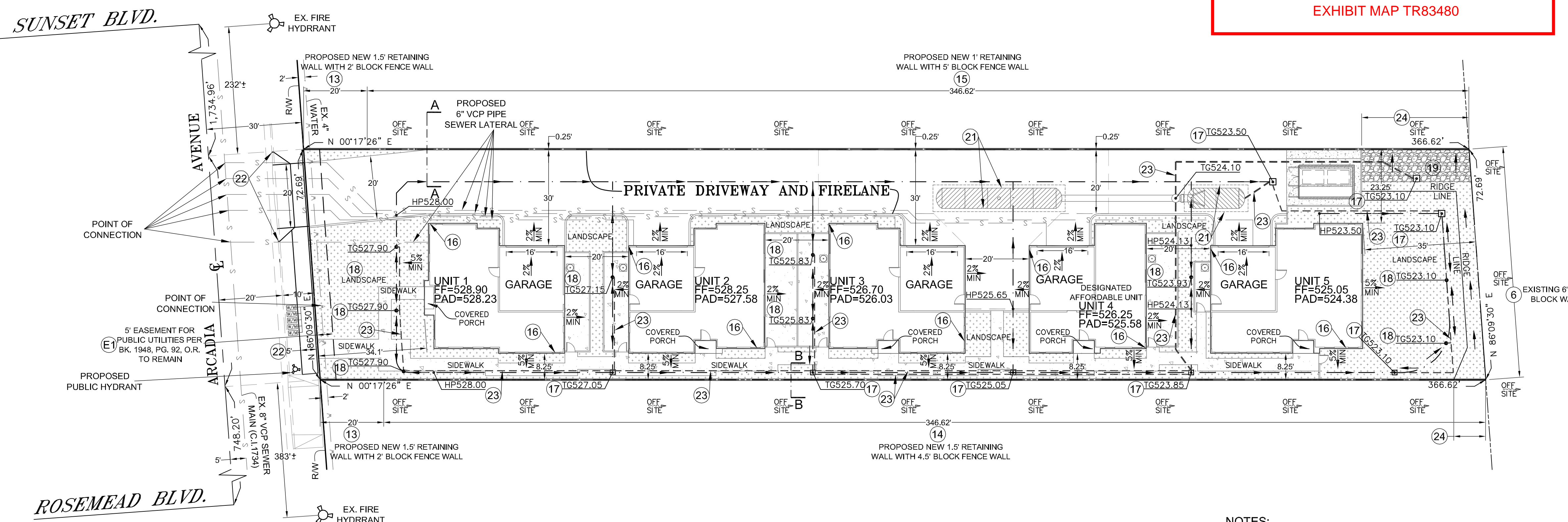
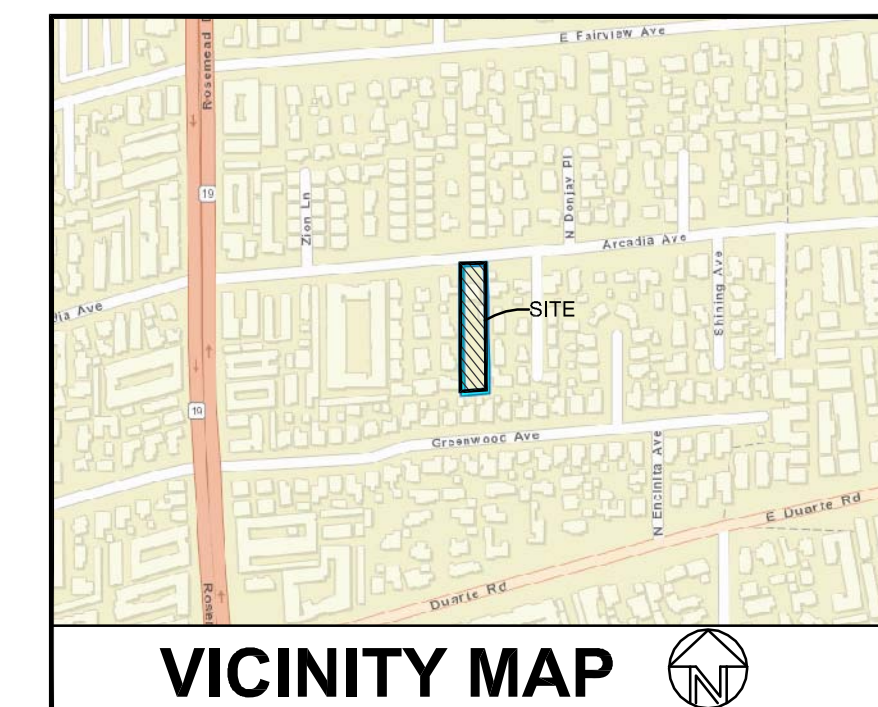
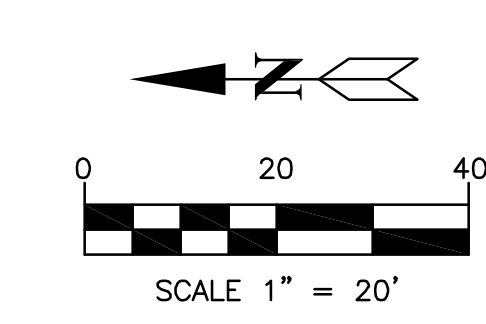
**LOS ANGELES DEPARTMENT OF
REGIONAL PLANNING
5/20/25
EXHIBIT MAP TR83480**

**CLEARED FOR
PUBLIC HEARING**

County of Los Angeles
Fire Department
Fire Prevention Division
Land Development Unit

LEGENDS & ABBREVIATIONS

- | | | | | | |
|-----|-------|--------------------|--|-------|----------------|
| TC | | TOP OF CURB | | | TREE |
| FL | | FLOW LINE | | | SHEET FLOW |
| FS | | FINISHED SURFACE | | | SEWER MANHOLE |
| FF | | FINISHED FLOOR | | | WATER METER |
| FG | | FINISHED GRADE | | | CONCRETE |
| INV | | INVERT ELEVATION | | | LANDSCAPE AREA |
| DWY | | DRIVEWAY APPROACH | | | SEWER LINE |
| (1) | | EXISTING ELEVATION | | | FIRE HYDRANT |
| (1) | | PROPOSED ELEVATION | | | |
| --- | | CENTERLINE | | | |
| --- | | PROPERTY LINE | | | |
| --- | | FLOW LINE | | | |
| --- | | FLOW PATTERN | | | |



ENGINEER:
JACK LEE, RCE 40870
576 E. LAMBERT ROAD,
BREA, CA 92821
TEL: 714.671.1050
FAX: 714.671.1090

UTILITIES:
WATER - EAST PASADENA WATER COMPANY
SEWER - COUNTY OF LOS ANGELES
GAS - SOUTHERN CALIFORNIA GAS CO.
ELECTRICAL - SOUTHERN CALIFORNIA EDISON CO.
TELEPHONE - AT&T / SBC
TRASH - ATHENS DISPOSAL COMPANY
CABLE TV - CHARTER COMMUNICATION CABLE

NOTE:
WASTE WATER WILL BE DISPOSED FROM JOB SITE TO THE
EXISTING MAIN BY GRAVITY.

PROJECT SUMMARY:
OWNER: E-HIGHLAND (US) CORP/JIANFEI JI
5003 GOLDEN WEST AVENUE, TEMPLE CITY, CA 91780
626-226-8864

PROJECT ADDRESS: 9072 ARCADIA AVENUE, SAN GABRIEL, CA 91775

PROJECT DESCRIPTION: 5 DETACHED CONDOMINIUM UNITS

EXISTING LOT: 1

PROPOSED LOT: 1

A.P.N.: 5379-024-021

EXISTING ZONING: R-1

PROPOSED ZONING: R-1

LAND USE DESIGNATION: H-9

EXISTING GENERAL PLAN: RESIDENTIAL

COMMUNITY STANDARD DISTRICT: EAST PASADENA-SAN GABRIEL
COMMUNITY STANDARDS DISTRICT

TOTAL AREA: 0.610 ACRE (26,580.20 S.F.)

AREAS: GROSS AREA: 0.610 ACRE (26,580.20 S.F.)
NET AREA: 0.602 ACRE (26,216.76 S.F.)

EXISTING MAIN HOUSE TO BE DEMOLISHED = 1,707.10 S.F.
EXISTING GARAGE TO BE DEMOLISHED = 548.69 S.F.
EXISTING STORAGE TO BE DEMOLISHED = 106.93 S.F.

FLOOR AREA SUMMARY:

UNIT 1 (TYPE A): 2 STORY, 25'-4" HEIGHT
BUILDING COVERAGE: 1,650 SF
4 BED ROOMS, 4-1/2 BATH,
400 SF;
28 SF

**ATTACHED 2-CAR GARAGE-
FRONT PORCH** -
2ND FL BALCONY -
LIVING AREA ON GROUND FLOOR-
LIVING AREA ON SECOND FLOOR-
TOTAL LIVING AREA:
35 SF
1,204 SF
1,150 SF
2,354 SF

UNIT 2&3 (TYPE B): 2 STORY, 25'-4" HEIGHT
BUILDING COVERAGE: 1,636 SF
4 BED ROOMS, 4 BATH,
400 SF;
28 SF
35 SF

**ATTACHED 2-CAR GARAGE-
FRONT PORCH** -
2nd FL BALCONY -
LIVING AREA ON GROUND FLOOR-
LIVING AREA ON SECOND FLOOR-
TOTAL LIVING AREA:
35 SF
1,204 SF
1,136 SF
2,342 SF

UNIT 4 (TYPE C): 2 STORY, 26'-10" HEIGHT
DESIGNATED AFFORDABLE UNIT
BUILDING COVERAGE: 1,388 SF
4 BED ROOMS, 3 BATH,
400 SF;
28 SF
60 SF

**ATTACHED 2-CAR GARAGE-
FRONT PORCH** -
2nd FL BALCONY -
LIVING AREA ON GROUND FLOOR-
LIVING AREA ON SECOND FLOOR-
TOTAL LIVING AREA:
902 SF
998 SF
1,900 SF

UNIT 5 (TYPE D): 2 STORY, 25'-7" HEIGHT
BUILDING COVERAGE: 1,845 SF
4 BED ROOMS + 1 OFFICE ROOM, 4-1/2 BATH,
400 SF;
28 SF
60 SF

**ATTACHED 2-CAR GARAGE-
FRONT PORCH** -
2nd FL BALCONY -
LIVING AREA ON GROUND FLOOR-
LIVING AREA ON SECOND FLOOR-
TOTAL LIVING AREA:
1,337 SF
1,275 SF
2,612 SF

PROPERTY FAR AND COVERAGE SUMMARY:
TOTAL LOT AREA: 26,579 SF
TOTAL FLOOR AREA: 11,550 SF
TOTAL LIVING FLOOR AREA: 11,550 SF
FAR: 0.4345 - FAR ALLOWED 0.50 (Max.)
TOTAL BUILDING COVERAGE: 8,155 SF (30.68%)

- NOTES:**
- ⑥ EXISTING 6' HIGH BLOCK WALL TO REMAIN
 - ⑬ PROPOSED NEW 1' RETAINING WALL WITH 2' BLOCK FENCE WALL, TOTAL H = 3.5'
 - ⑭ PROPOSED NEW 1.5' RETAINING WALL WITH 4.5' BLOCK FENCE WALL, TOTAL H = 6'
 - ⑮ PROPOSED NEW 1' RETAINING WALL WITH 5' BLOCK FENCE WALL, TOTAL H = 6'
 - ⑯ PROPOSED BUILDING
 - ⑰ PROPOSED CATCH BASIN
 - ⑱ PROPOSED AREA DRAIN
 - ⑲ PROPOSED RIP-RAP
 - ⑳ PROPOSED 5' WIDE SIDEWALK
 - ㉑ INSTALL STORMTECH CHAMBER INFILTRATION SYSTEM
 - ㉒ PROPOSED DRIVEWAY APPROACH
 - ㉓ PROPOSED PIPE
 - ㉔ OMIT EVERY OTHER BLOCK WALL

EASEMENT NOTE:
⑤ 5' EASEMENT FOR PUBLIC UTILITIES PER BK. 1948, PG. 92, O.R. TO REMAIN

NO OAK TREE ONSITE

NO ENTRANCE GATE PROPOSED

**LACFCD IS NOT TO MAINTAIN
ANY DRAINAGE DEVICES**

South Side of Arcadia Ave	
APN	Setback (Ft)
5379-025-010	18.01
5379-025-009	19.76
5379-025-006	37.88
5379-025-012	40.07
5379-025-011	20.65
5379-025-014 TO -019	39.54
5379-024-038	51.32
5379-024-026	21.78
5379-024-021	49.92
5379-024-029	20.19
5379-024-019	49.77
5379-024-018	33.53
5379-024-041	30.82
5379-024-016	46.31
5379-023-024	38.85
5379-023-023	43.96
5379-023-037	19.98
5379-023-018	21.05
5379-023-016	35.24
5379-023-015	39.59
5379-023-009	61.60
5379-023-038	24.59
Average Setback (Excluding Arcadia 9072)	34.02

AVERAGE FRONT SETBACK
- subtract subject property
= 714.49/21=34.02

EARTHWORK QUANTITIES:

CUT: 380 CY FILL: 210 CY
EXPORT: 170 CY OVER-EXCAVATION: 1,867 CY

SPECIAL NOTES:
THE QUANTITIES SHOWN HEREON ARE FOR PERMIT AND BONDING
PURPOSES ONLY. THE CONTRACTOR SHALL VERIFY QUANTITIES
PRIOR TO START OF GRADING

HOA NOTE:
HOMEOWNER'S ASSOCIATION SHALL BE ESTABLISHED
TO ENSURE BASIC MAINTENANCE AND INFRASTRUCTURE
DEVELOPMENTS OF ITS SURROUNDINGS.

REQUIRED AND PROPOSED SETBACK:

FRONT SETBACK- REQUIRED: 34.02' -(20'-0" OR / AVERAGE SETBACK, WHICHEVER IS
GREATER) SEE ATTACHED SETBACK ANALYSIS FOR
REFERENCE

PROPOSED: 34'-1"

SIDE SETBACK- GROUND FLOOR REQUIRED: 10% OF LOT WIDTH (7'-3")
PROPOSED : 8'-3"

SECOND FLOOR REQUIRED: AFTER 5' FROM PROPERTY LINE,
STRUCTURE OVER 10', SETBACK 1
FOOT EVERY 1 FOOT HEIGHT

PROPOSED: 14'-3"

REAR SETBACK- REQUIRED: 35'-0"
PROPOSED: 35'-0"

PROPOSED BUILDING HEIGHT: 2 STORY : 25'-4" (TYPE A & B); 26'-10"
(TYPE C); 25'-7"(TYPE D)

BUILDINGS SEPARATION REQUIRED: 20'-0"
BUILDINGS SEPARATION PROPOSED: 20'-0"

FRONT YARD LANDSCAPING CALCULATION:
FRONT YARD AREA: 2,468 SF
DESIGNED SOFTCAPE LANDSCAPING AREA: 1,408 SF (57.5% > MIN. REQUIRED 50%)

BENCHMARK:
COUNTY BENCHMARK 1G3589

RDBM TAG IN S CB 2FT W/O BCR @ SW COR
DUARTE RD & OAK AVE

ELEVATION: 510.183'

PROJECT LOCATION:
9072 ARCADIA AVENUE,
SAN GABRIEL, CA 91775

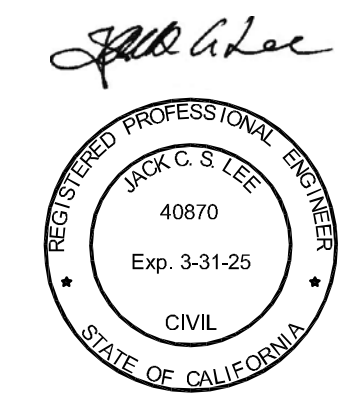
OWNER:
E-HIGHLAND (US) CORP/
JIANFEI JI
5003 GOLDEN WEST AVENUE
TEMPLE CITY, CA 91780
626-226-8864

DRAWN: PYS
CHECKED:
DATE: 08/07/2024
JOB NO.: 20-019-041
SCALE: 1" = 20'
FILE NAME:

CALLAND ENGINEERING, INC.
dba QUARTECH CONSULTANTS
576 E. LAMBERT ROAD, BREA, CA 92821
TEL: (714) 671-1050 FAX: (714) 671-1090

T-1

SHEET 1 OF 1 SHT.





COUNTY OF LOS ANGELES FIRE DEPARTMENT FIRE PREVENTION DIVISION

Land Development Unit
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4243, Fax (323) 890-9783

EPIC-LA NUMBER: RPPL2021007371 PROJECT NUMBER: TR83480
CITY/COMMUNITY: Northeast San Gabriel STATUS: Cleared
PROJECT ADDRESS: 9072 E Arcadia Avenue DATE: 06/18/2025
San Gabriel, CA 91775

CONDITIONS

1. Provide a final map showing the approved access and easements for the tentative map in development. A recorded access easement must be provided at the time of the final map review.
2. All new fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze, conforming to current AWWA standard C503 or approved equal, and shall be installed in accordance with the County of Los Angeles Fire Code.
3. The required fire flow for the public fire hydrants for single family residential homes less than a total square footage of 3600 feet is 1250 gpm at 20 psi residual pressure for 2 hours with one public fire hydrant flowing. Any single family residential home 3601 square feet or greater shall comply too Table B105.1 of the Fire Code in Appendix B.
4. Install one (1) PUBLIC fire hydrant in the location shown on the site plan. (mapdate 08-09-21)
5. The Fire Department's Land Development Unit has approved the Fire Apparatus Access Roads as shown on the Tentative Map/site plan in compliance with the County of Los Angeles Fire Code.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or joseph.youman@fire.lacounty.gov.

Reviewed by:



**LOS ANGELES COUNTY
DEPARTMENT OF PARKS AND RECREATION
PARK OBLIGATION REPORT**



Tentative Map # **83480**
Park Planning Area # **42**

DRP Map Date: **05/20/2025** SCM Date: **12/15/2022** Report Date: **06/16/2025**
CSD: **EAST PASADENA - EAST SAN GABRIEL** Map Type: **Tentative Map - Tract CSD**

Total Units = Proposed Units + Exempt Units

Park land obligation in acres or in-lieu fees:

ACRES:	0.04
IN-LIEU FEES:	\$21,334

Sections 21.24.340, 21.24.350, 21.28.120, 21.28.130, and 21.28.140, the County of Los Angeles Code, Title 21, Subdivision Ordinance provide that the County will determine whether the development's park obligation is to be met by:

- 1) the dedication of land for public or private park purpose or,
- 2) the payment of in-lieu fees or,
- 3) the provision of amenities or any combination of the above.

The specific determination of how the park obligation will be satisfied will be based on the conditions of approval by the advisory agency as recommended by the Department of Parks and Recreation.

The Representative Land Value (RLVs) in Los Angeles County Code (LACC) Section 21.28.140 are used to calculate park fees and are adjusted annually, based on changes in the Consumer Price Index. The new RLVs become effective July 1st of each year and may apply to this subdivision map if first advertised for hearing before either a hearing officer or the Regional Planning Commission on or after July 1st pursuant to LACC Section 21.28.140, subsection 3. Accordingly, the park fee in this report is subject to change depending upon when the subdivision is first advertised for public hearing.

The park obligation for this development will be met by:

The payment of \$21,334 in lieu fees.

Trails:

No Trails

Comments:

For further information or to schedule an appointment to make an in-lieu fee payment:

Please contact Loretta Quach at lquach@parks.lacounty.gov or (626) 588-5305
Department of Parks and Recreation, 1000 S. Fremont Avenue, Building A-9 West, Alhambra, California 91803.

By: *Loretta Quach*
Loretta Quach, Departmental Facilities Planner I



**LOS ANGELES COUNTY
DEPARTMENT OF PARKS AND RECREATION
PARK OBLIGATION WORKSHEET**



Tentative Map # **83480**
Park Planning Area # **42**

DRP Map Date: **05/20/2025** SCM Date: **12/15/2022** Report Date: **06/16/2025**
CSD: **EAST PASADENA - EAST SAN GABRIEL** Map Type: **Tentative Map - Tract CSD**

The formula for calculating the acreage obligation and or in-lieu fee is as follows:

$$(P)\text{eople} \times (0.0030)\text{ Ratio} \times (U)\text{nits} = (X)\text{ acres obligation}$$

$$(X)\text{ acres obligation} \times \text{RLV/Acre} = \text{In-Lieu Base Fee}$$

- Where P = Estimate of number of People per dwelling unit according to the type of dwelling unit as determined by the U.S. Census
- Ratio = The subdivision ordinance provides a ratio of 3.0 acres of park land for each 1,000 people generated by the development. This ratio is calculated as "0.0030" in the formula.
- U = Total approved number of Dwelling Units.
- X = Local park space obligation expressed in terms of acres.
- RLV/Acre = Representative Land Value per Acre by Park Planning Area.

Total Units = Proposed Units + Exempt Units

Park Planning Area = **42**

Type of dwelling unit	People *	Ratio 3.0 Acres/ 1000 People	Number of Units	Acre Obligation
Detached S.F. Units	2.96	0.0030	4	0.04
M.F. < 5 Units	2.70	0.0030	0	0.00
M.F. >= 5 Units	2.50	0.0030	0	0.00
Mobile Units	4.45	0.0030	0	0.00
Exempt Units			1	0.00
TOTAL			5	0.04

Ratio	Acre Obligation	RLV / Acre	In-Lieu Base Fee
@ (0.0030)	0.04	\$600,615	\$21,334

Lot #	Provided Space	Provided Acres	Credit (%)	Acre Credit
0		0.00	100.00%	0.00
Total Provided Acre Credit:				0.00

Acre Obligation	Net Obligation	RLV / Acre	In-Lieu Fee Due
0.04	0.00	\$600,615	\$21,334



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

MUNTU DAVIS, M.D., M.P.H.
County Health Officer

ANISH P. MAHAJAN, M.D., M.S., M.P.H.
Chief Deputy Director

AZAR KATTAN, J.D., M.P.H.
Deputy Director for Health Protection

LIZA FRIAS, REHS
Director of Environmental Health

SCOTT ABBOTT, REHS, M.P.A.
Assistant Director of Environmental Health

SHIKARI NAKAGAWA-OTA, REHS
Assistant Director of Environmental Health

5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5374 • FAX (626) 813-3000

www.publichealth.lacounty.gov/eh/

June 17, 2025

TO: Joshua Huntington
Supervising Regional Planner
Department of Regional Planning

Attention: Michelle Lynch

FROM: Lusi Mkhitarian, REHS, MPH
Environmental Health Services Manager
Department of Public Health

Lusi Mkhitarian

**SUBJECT: LAND DIVISION – TENTATIVE MAP- TRACT
CASE: RPPL2021007371
PROJECT: TR83480
9072 E. ARCADIA AVENUE SAN GABRIEL CA 91775**

Thank you for the opportunity to review the application and Tentative Map-Tract request for the subject property. The applicant requests to develop a new multi-family lot with five detached condominium units on a 0.61-acre lot.

- Public Health conditions for this project have been met as of the date of this letter. Public Health recommends clearance of the aforementioned project.



BOARD OF SUPERVISORS

Hilda L. Solis
First District

Holly J. Mitchell
Second District

Lindsey P. Horvath
Third District

Janice Hahn
Fourth District

Kathryn Barger
Fifth District

- Public Health **DOES NOT** recommend clearance of the subject project and requires that the following conditions and/or information requested below be addressed before agency clearance:

1. Drinking Water Program: Potable Water

- 1.1 The project will be required to have an approved safe and reliable potable water source, either from an approved onsite source (i.e., ground water well) or a permitted nearby public water system that meets the water demands of the proposed project.
- 1.2 When a public water system is intended to be utilized as a potable water source, submit a copy of a current (issued within the past 12 months) signed water "Will Serve" letter from the approved public water system purveyor in the service area. Conditional "Will Serve" letters may not be accepted until either the conditions are met or agreed to in writing by the applicant, as determined by the Department.

For questions regarding the potable water, please contact Bharat Dungrani at (626) 430-5420 or waterquality@ph.lacounty.gov.

2. Onsite Wastewater Treatment Program: Wastewater

- 2.1 The project will be required to have an approved safe and reliable method of wastewater disposal from a permitted nearby public sewer system that meets the load demands of the proposed project.
- 2.2 Provide an updated copy of a current (issued within the past 12 months) signed "Sewer Will Serve" letter from the approved public sewer system in the service area. Conditional "Will Serve" letters may not be accepted until either the conditions are met or agreed to in writing by the applicant, as determined by the Department. Ensure that the "Will Serve" letter lists all applicable addresses for the subject project.

For questions regarding wastewater, please contact Tigran Khachatryan at (626) 430-5380 or tkhachatryan@ph.lacounty.gov

3. Community Protection Branch: Environmental Hygiene

Please note: The following are general requirements for Noise and Air Quality recommendations for the project.

The applicant shall abide by the requirements contained in Title 12, Section 12.08.390, 12.08.440, and 12.08.530, Noise Control Ordinance for the County of Los Angeles (reference available at municode.com).

Joshua Huntington

June 17, 2025

Page 3 of 3

3.1 Noise

3.1.1 The applicant shall abide by the requirements contained in Title 12, Section 12.08, Noise Control Ordinance for the County of Los Angeles (reference available at municode.com). The sections in Title 12 that apply to this project include but are not limited to: 12.08.390 Exterior Noise Standards, 12.08.440 Construction Noise, 12.08.520 Refuse Collection Vehicles, and 12.08.530 Residential Air Conditioning.

3.4.3 Air Quality Recommendation

During grading or excavation activities, if applicable, application of dust control measures to minimize fugitive dust is recommended. Fugitive dust can result in worker and public exposure to fungal spores such as *Coccidioides*, which can cause Coccidioidomycosis (Valley Fever). Adhere to applicable Air Quality Management District regulations.

For questions regarding the above comments, please contact Makkaphoeum Em, Environmental Hygiene Program at (626) 430-5201 or mem@ph.lacounty.gov.

If you have any other questions or require additional information, please contact Veronica Aranda of Public Health, Land Use Liaison at varanda@ph.lacounty.gov.

LM:va

DPH_NOT_CLEARED_9072 E. ARCADIA AVENUE SAN GABRIEL CA 91775_RPPL2021007371_06.17.2025



February 5, 2026

TENTATIVE MAP CONDITIONS OF APPROVAL

Project No. RPPL2021007371

Tract Map No. TR83480

Assessor Identification No. 5379024021

The following provides a summary of the housing permit conditions of approval for the project located at 9072 E Arcadia Avenue San Gabriel, CA 91775, as they relate to the oversight and approval obligations of the Los Angeles County Development Authority (LACDA).

The LACDA recommends clearance of this project to proceed to public hearing so long as the subdivision conforms to the policies and procedures of the LACDA as stated below to the satisfaction of the Executive Director of the LACDA, or their designee.

The conditions of approval prior to final map recordation include, but are not limited to:

1. The income restricted units shall be indistinguishable in exterior and interior design from the non-restricted units within the project in terms of appearance, materials and finished quality. The income restricted units shall have the same number of bedrooms as the non-restricted units at the project. In a development with a variety of bedroom counts per unit, the percentage of income restricted units with a particular number of bedrooms shall be equal to the percentage of the non-restricted units at the project with the same number of bedrooms.
2. The income restricted units shall be dispersed throughout the project equitably and be no less attractive or desirable on average (whether because of convenient access or amenities) than the other non-restricted units.
3. The income restricted units shall be constructed within each development phase of the project, as applicable.
4. Developer acknowledges that an affordable housing covenant related to the income-restricted units shall be approved and recorded prior to, or concurrently with, final map recordation.



lacda.org

Administrative Office

700 West Main Street, Alhambra, CA 91801

Tel: (626) 262-4511 TDD: (626) 943-3898

Executive Director: Emilio Salas

Commissioners: Hilda L. Solis, Holly J. Mitchell, Lindsey P. Horvath, Janice Hahn, Kathryn Barger





5. Developer acknowledges that a one-time compliance monitoring fee will be collected for each income restricted unit at the time of covenant recordation. Monitoring will include annual owner certification.
6. All affordable units, including voluntary or proffered units, must align with the income categories as defined in Title 22 of the Los Angeles County Code. Under no circumstance should any affordable unit, including voluntary/proffered units, exceed 150% AMI as defined by HCD's income and rent limits.
7. The affordable housing covenant for homeownership projects shall include provisions restricting the initial sale to eligible buyers and requiring an equity sharing agreement with the County that states the terms set forth in Los Angeles County Code Section 22.166.070.A.3.d. All income restricted units, regardless if they are voluntary/proffered or approved under the County's Density Bonus and/or Inclusionary Housing ordinances, are subject to the LACDA's equity sharing program and guidelines.
8. The initial sales price of the income restricted units in homeownership projects will be determined by the LACDA's Affordable Sales Price Calculator (subject to be updated and changed periodically), available on the Department of Regional Planning's website.
9. The affordable housing covenant is a land use covenant and must be senior to all deeds of trust.

If you need more information or have any questions about this report, please contact Vicente Arellano, Housing Planner, by email at vicente.arellano@lacda.org.



lacda.org

Administrative Office
700 West Main Street, Alhambra, CA 91801
Tel: (626) 262-4511 TDD: (626) 943-3898

Executive Director: Emilio Salas

Commissioners: Hilda L. Solis, Holly J. Mitchell, Lindsey P. Horvath, Janice Hahn, Kathryn Barger



Pursuant to the Subdivision Map Act (Government Code Sections 66474 and 66474.02), the applicant shall substantiate the following:

(Do not repeat the statement or provide Yes/No responses. If necessary, attach additional pages.)

a) The proposed map is consistent with applicable General Plan/Community Plan and Specific Plan.
b) The design or improvement of the proposed subdivision is consistent with applicable General Plan/Community Plan and Specific Plan.
c) The site is physically suitable for the type of development.
d) The site is physically suitable for the proposed density of development.

e) The design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

f) The design of the subdivision or type of improvements is not likely to cause serious public health problems.

g) The design of the subdivision or the type of improvements will not conflict with easements of record or easements established by judgement of a court of competent jurisdiction, acquired by the public at large, for access through or use of, property within the proposed subdivision.

h) For an area located in a state responsibility area or a very high fire hazard severity zone, the subdivision is consistent with regulations adopted by the State Board of Forestry and Fire Protection as meeting or exceeding the state regulations.

i) For an area located in a state responsibility area or a very high fire hazard severity zone, that structural fire protection and suppression services will be available for the subdivision through either a county, city, special district, political subdivision of the state, another entity organized solely to provide fire protection services that is monitored and funded by a county or other public entity, or the Department of Forestry and Fire Protection by contract.

PROPOSED ENVIRONMENTAL DETERMINATION

DETERMINATION DATE: April 6, 2026
PROJECT NUMBER: PRJ2021-002634
PERMIT NUMBER: Tentative Tract Map No. 83480 (RPPL2021007371)
SUPERVISORIAL DISTRICT: 5
PROJECT LOCATION: 9072 Arcadia Avenue, San Gabriel
OWNER: Jianfei Ji
APPLICANT: Peterzon Sy
CASE PLANNER: Michelle Lynch, Principal Planner
mlynch@planning.lacounty.gov

Los Angeles County (“County”) completed an initial review for the above-mentioned project. Based on examination of the project proposal and the supporting information included in the application, the County proposes that an Exemption is the appropriate environmental documentation under the California Environmental Quality Act (CEQA). The project qualifies as a Class 15 (Minor Land Divisions), Section 15315 Categorical Exemption pursuant to California Environmental Quality Act (Public Resources Code section 21000, et seq.) (“CEQA”), the State CEQA Guidelines, and the Environmental Document Reporting Procedures and Guidelines for the County, on the basis that the project involves subdividing four or fewer parcels. The project will subdivide a flat property, with an average slope that is less than 20 percent, into one parcel with five condominium dwellings, and does not involve a prior subdivision in the last two years. The project site fronts a public street and will be served by public water and sewer. The project is not on a list maintained by the California Department of Toxic Substance Control and the Regional Water Quality Control Board and does not contain any registered historic resources. The project is also not located near a scenic highway, and there is no reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances, nor result in cumulative impacts. Therefore, there are no exceptions to the exemption, and therefore, the project is categorically exempt.

AERIAL IMAGERY

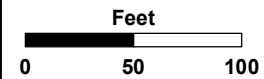
SITE-SPECIFIC MAP

PROJECT NO. PRJ2021-002634

TR RPPL2021007371



Digital Ortho Aerial Imagery:
Los Angeles Region Imagery
Acquisition Consortium (LARIAC)
2025



LA COUNTY
PLANNING

LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012



From: Michael McNeil <mike@mcneilsafetyconsulting.com>
Sent: Friday, May 8, 2026 8:37 AM
To: planning@planning.lacounty.gov; Michelle Lynch
Cc: EDL-DRP BU-S Commission Services; EDL-DRP BU-D Executive Office; Barger, Kathryn; EDL-DRP BU-D Advance Planning Public Contact Email
Subject: WRITTEN OPPOSITION AND OBJECTION TO PROJECT NO. PRJ2021-002634 Tentative Tract Map — 9072 E. Arcadia Avenue Unincorporated North San Gabriel, Los Angeles County, CA 91775

CAUTION: External Email. Proceed Responsibly.

May 8, 2026

RE: WRITTEN OPPOSITION AND OBJECTION TO PROJECT NO. PRJ2021-002634 Tentative Tract Map — 9072 E. Arcadia Avenue Unincorporated North San Gabriel, Los Angeles County, CA 91775 (West San Gabriel Valley Planning Area) Public Hearing: June 3, 2026, 9:00 a.m., Hall of Records, Room 150

Dear Ms. Lynch and Honorable Commissioners:

I am the owner-occupant of 9163 Arcadia Avenue, located in unincorporated North San Gabriel directly across from the proposed project site. I submit this opposition for inclusion in the administrative record of Project No. PRJ2021-002634 and request that the Regional Planning Commission **deny** the proposed Tentative Tract Map, **vacate** the staff-level CEQA exemption determination, and **make the mandatory findings of denial** required by Government Code § 66474 of the Subdivision Map Act.

I write in my individual capacity as a directly affected neighbor. For the record, I am a credentialed environmental and occupational health professional with more than fifteen years of experience in environmental compliance, industrial hygiene, stormwater management, hazardous materials, and CEQA/NEPA implementation. The technical observations below are offered to satisfy the "fair argument" threshold for full environmental review under *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.

I. PROJECT AS NOTICED

The Notice of Public Hearing posted at the project site identifies the following:

- A Tentative Tract Map authorizing creation of **five (5) detached condominium units** on a project area of **approximately 0.4 acres** (≈17,424 sq. ft.);
- All five units served by **a single shared private driveway and fire lane** connecting to Arcadia Avenue;

- Demolition of the existing single-family residence (a 4-bedroom, 2-bath, ~2,678 sq. ft. structure last sold February 2020 for \$2.2 million);
- A staff CEQA determination of **Class 32 Categorical Exemption** (Infill Development) under 14 Cal. Code Regs. § 15332.

The site is in the **unincorporated** area of Los Angeles County (North San Gabriel) within the West San Gabriel Valley Planning Area. The applicable base zoning is **R-1 (Single Family Residence)** under County Code Title 22.

II. THE STAFF CEQA DETERMINATION IS LEGALLY DEFECTIVE ON ITS FACE

A. Class 32 (CEQA Guidelines § 15332) Cannot Apply to Projects in Unincorporated County Areas

The Notice identifies the CEQA basis as a "Class 32 Categorical Exemption" under 14 Cal. Code Regs. § 15332. By its plain text, that exemption is unavailable to this project.

CEQA Guidelines § 15332(b) requires that the project occur "**within city limits on a project site of no more than five acres substantially surrounded by urban uses.**" The project site is in **unincorporated** Los Angeles County, North San Gabriel. It is not within any incorporated city limits. The plain-language requirement of subsection (b) is not satisfied, and Class 32 is unavailable as a matter of law. *See Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal.App.4th 694, 708 (categorical exemption findings must be supported in the record before approval).

The California Legislature recognized this exact gap and enacted **Public Resources Code § 21159.25** (effective January 1, 2019; A.B. 1804) as the parallel statutory exemption for certain multifamily housing in unincorporated county areas. Section 21159.25 imposes materially different and more demanding criteria than Class 32, including: (i) the project must qualify as a "residential or mixed-use housing project" with at least two-thirds residential square footage; (ii) the site must be "wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau" (Pub. Res. Code § 21159.25(b)(7)); (iii) the parcel must be substantially surrounded by "qualified urban uses" (§ 21159.25(b)(3)); and (iv) several additional infrastructure, hazard, and environmental prerequisites not embedded in Class 32. **None of these findings appear** on the Notice or in any documentation publicly disclosed for this project.

The Commission cannot cure this defect by re-labeling the determination at the hearing. CEQA findings must be supported by substantial evidence in the record before the decision is made, and the public must have a meaningful opportunity to review and comment on the actual basis claimed. *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1105; *Save Our Big Trees, supra*, 241 Cal.App.4th at 708; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75. CEQA's informational purpose "is not satisfied by simply stating information will be provided in the future." *Vineyard Area*

Citizens for Responsible Growth v. City of Rancho Cordova (2007) 40 Cal.4th 412, 431.

Requested action: Withdraw the Class 32 determination, prepare a properly noticed Initial Study under CEQA Guidelines § 15063, and re-notice the hearing.

B. Even If the County Intended to Invoke PRC § 21159.25, the Record Does Not Support the Required Findings

Section 21159.25 is not self-executing. It requires the lead agency to make written findings supported by substantial evidence that **each** of the statutory criteria is satisfied. No such findings have been disclosed to the public. The defect is not curable by post-hoc explanation at the hearing podium. *Save Our Big Trees, supra*, 241 Cal.App.4th 694; *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 138 (CEQA review must precede project commitment).

III. THE § 15300.2 EXCEPTIONS INDEPENDENTLY DEFEAT ANY CATEGORICAL EXEMPTION

Even assuming, *arguendo*, that any categorical exemption could apply, this project triggers **multiple** exceptions under 14 Cal. Code Regs. § 15300.2, each of which **independently** bars its use.

The applicable legal standard is the "fair argument" test. Under *No Oil*, when there is **any substantial evidence** that a project **may** have a significant environmental impact, an EIR must be prepared, even where contrary evidence exists. *No Oil, supra*, 13 Cal.3d at 83 ("[a]n effect on the environment need not be 'momentous' to meet the CEQA test for significance; it is enough that the impacts are 'not trivial.'"). The fair argument standard creates a "low threshold" favoring environmental review. *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928. *Berkeley Hillside, supra*, 60 Cal.4th 1086 holds that the fair argument standard governs whether unusual circumstances create a reasonable possibility of significant impact under § 15300.2(c).

A. § 15300.2(b) — Cumulative Impact

The County's **own** programmatic environmental record on the West San Gabriel Valley Area Plan ("WSGVAP") expressly identifies **significant and unavoidable cumulative impacts in Aesthetics, Air Quality, Biological Resources, Cultural Resources, Noise, and Transportation**. The Commission cannot, consistent with § 15300.2(b), exempt this project from review when the County's own Draft PEIR concedes that successive small-lot infill subdivisions in this Planning Area are cumulatively significant. *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 117–120; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718–722 (cumulative impacts may not be dismissed because individual project's contribution is

small).

B. § 15300.2(c) — Unusual Circumstances

The two-pronged test of *Berkeley Hillside* is satisfied. **Prong one:** the project differs materially from the typical Class 32 prototype — five detached units on approximately 0.4 acres, a density of roughly 12.5 dwelling units per acre on a parcel zoned R-1, where Title 22 § 22.52.100 sets a 5,000 sq. ft. minimum lot area. The proposed individual lot footprints would average roughly 3,485 sq. ft. — **below** the R-1 minimum — on a substreet served only by a private driveway/fire lane. **Prong two:** there is a reasonable possibility of significant impacts identified throughout this letter, including degraded emergency response, water and power service inadequacy, traffic and on-street parking displacement, asbestos and lead-paint disturbance, and stormwater quality degradation.

C. § 15300.2(f) — Historical Resources

Demolition of the substantial pre-1978 single-family residence at 9072 Arcadia Avenue triggers the requirement to evaluate whether the structure qualifies as a "historical resource" under Public Resources Code § 21084.1 and CEQA Guidelines § 15064.5. *Valley Advocates v. City of Fresno* (2008) 160 Cal.App.4th 1039 (historical resources analysis cannot be avoided through categorical exemptions). No such evaluation has been disclosed.

D. § 15300.2(e) — Hazardous Waste / Adjacent Hazards

Demolition of an older residential structure within a dense residential corridor without a documented Phase I Environmental Site Assessment (ASTM E1527-21), asbestos survey under SCAQMD Rule 1403 / 40 CFR Part 61 Subpart M (NESHAP), or lead-based paint risk assessment under HUD/EPA Lead Renovation, Repair and Painting Rule (40 CFR Part 745) falls outside the "environmentally benign" character that Class 32 is intended to capture.

IV. THE PROJECT IS INCONSISTENT WITH THE GENERAL PLAN AND TITLE 22 ZONING — DEFEATING § 15332(a) AND § 21159.25 ALIKE

Class 32 and PRC § 21159.25 each require the project to be **consistent with the applicable general plan designation and all applicable general plan policies, as well as with applicable zoning designation and regulations**. This project is not. A project's inconsistency with local plans and policies adopted to mitigate environmental harm constitutes a significant impact under CEQA. *Pocket Protectors, supra*, 124 Cal.App.4th at 929; *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777, 782; *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 874.

A. R-1 Density and Lot Size

Under County Code Title 22 § 22.52.100/22.52.250, the R-1 zone requires a minimum lot area of **5,000 sq. ft. per lot**. A five-unit detached subdivision on approximately 17,424 sq. ft. of gross site area produces individual parcels well below this floor. The project as described requires either (i) variances under Chapter 22.194, (ii) a density bonus under Chapter 22.120 / Government Code § 65915, or (iii) a small-lot subdivision modification — **none of which are disclosed on the public Notice**, and none of which can be reconciled with a "consistent with applicable zoning" finding.

B. WSGV Planning Area Standards District ("PASD")

The site falls within the West San Gabriel Valley PASD framework, which imposes additional standards on form, massing, façade composition, biological resources, and significant ridgelines. Compliance has not been demonstrated.

C. Setback, Yard, and Parking

R-1 standards require a 20-foot front yard, 5-foot interior side yards, 15-foot rear yards, and **two covered parking spaces per single-family residence**. A five-unit detached subdivision on a single shared driveway raises substantial questions whether each individual lot can satisfy all envelope standards plus the covered-parking requirement and on-site guest parking. No site plan, parking study, or yard-setback table accompanies the Notice.

V. THE PROJECT WILL CAUSE SIGNIFICANT, UNMITIGATED IMPACTS ON LOCAL INFRASTRUCTURE — REQUIRING FULL ENVIRONMENTAL REVIEW

This Section identifies specific physical infrastructure deficiencies on Arcadia Avenue and in the surrounding North San Gabriel neighborhood that, individually and cumulatively, raise a fair argument of significant environmental impact. CEQA Guidelines § 15064(d) makes clear that direct **and reasonably foreseeable indirect physical changes in the environment** caused by a project must be analyzed.

A. Inadequate Water Supply and Distribution Infrastructure

The existing water main and service infrastructure on Arcadia Avenue was sized for low-density single-family residential use, not multifamily condominium tract development.

CEQA's controlling water supply authority is *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412. *Vineyard* requires that the lead agency: (i) identify likely water sources for the project; (ii) demonstrate a "reasonable likelihood" that water will be available; (iii) disclose uncertainties; and (iv) analyze the impacts of supplying that water. *Id.* at 431–434. "[S]peculative sources and unrealistic

allocations ('paper water') are insufficient bases for decision-making under CEQA." *Id.* at 432. Earlier appellate decisions, including *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182 and *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, hold that an EIR must analyze whether the local water purveyor can in fact deliver water to the project.

Here, the staff CEQA determination contains **no Water Supply Assessment, no purveyor will-serve letter, no fire-flow analysis, and no main-capacity calculation** for adding five new residential service connections plus required fire suppression demand to a residential block presently served by aging infrastructure. The Commission cannot make the threshold consistency or "environmentally benign" findings required for any infill exemption without this record.

Additionally, demand from the project triggers obligations under Water Code §§ 10910–10912 and Public Resources Code § 21151.9 (Water Supply Assessment requirements for projects subject to CEQA). The County's failure to consult with the applicable water purveyor, and to disclose pressure, flow, and main-size data, deprives the public and the Commission of the disclosure required by *Vineyard*.

B. Inadequate Electrical Power Infrastructure

The neighborhood's electrical distribution infrastructure — pole-mounted transformers, secondary service drops, and feeder capacity — was sized for the existing single-family residential land use. Adding five condominium units (each with its own panel, HVAC, EV charging, and modern plug load) on a single 0.4-acre lot constitutes a foreseeable, material increase in electrical load. The Notice does not include a Southern California Edison (SCE) will-serve letter, transformer load study, or service upgrade plan.

CEQA Guidelines Appendix G § VI ("Energy") requires analysis of whether a project will "result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources" or "conflict with or obstruct a state or local plan for renewable energy or energy efficiency." The Initial Study Appendix G checklist was added to expressly require energy impacts analysis. Without an SCE service capacity disclosure, the County cannot make a substantial evidence finding that energy infrastructure can support the increased load — a foreseeable indirect physical effect under CEQA Guidelines § 15064(d).

C. Significant Traffic and Vehicle Miles Traveled (VMT) Impacts

Arcadia Avenue is a residential collector street with limited curb width, no dedicated turn lanes, and existing weekday/weekend congestion. The conversion of a single-family residence (estimated ~10 daily vehicle trips per ITE Trip Generation Manual) to a **five-unit condominium development** (roughly 30–45 daily trips, plus construction-phase truck traffic) constitutes a material increase.

The controlling case for traffic impact analysis at the categorical exemption / MND stage is *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322. In *Mejia*, the Second District Court of Appeal **set aside a 21-lot subdivision approval** in the Sunland area where the City of Los Angeles had relied on a mitigated negative declaration without full EIR review. The court held that public comments and the absence of a careful traffic study supported a **fair argument** of significant traffic impacts on a residential collector street — directly analogous to the situation on Arcadia Avenue.

Under SB 743 (Statutes 2013) and CEQA Guidelines § 15064.3 (effective July 1, 2020), the Vehicle Miles Traveled (VMT) metric replaced Level of Service (LOS) as the primary CEQA transportation impact metric. Notwithstanding the VMT framework, **physical safety effects** of project-induced traffic — turning conflicts, queuing, driveway sight distance, and emergency access — remain analyzable under CEQA Guidelines § 15064.3(b)(4) and Appendix G § XVII. No traffic study, sight-distance analysis, or queueing analysis has been disclosed.

D. On-Street Parking Displacement

Arcadia Avenue presently experiences saturated on-street parking conditions during evening and weekend hours due to existing single-family residences with limited on-site parking. A five-unit condominium with a single shared driveway will materially increase on-street parking demand:

- **Construction phase:** contractor trucks, subcontractor vehicles, dumpsters, portable toilets, and material deliveries will displace existing residential on-street parking for a period likely exceeding 12–18 months.
- **Operational phase:** residents and guests will compete for limited curb space; the project's "5 detached condos on shared driveway" configuration suggests insufficient on-site guest parking.

While *Taxpayers for Accountable School Bond Spending v. San Diego Unified School District* (2013) 215 Cal.App.4th 1013 holds that loss of on-street parking is **not by itself** a CEQA impact, parking displacement that produces secondary physical impacts — increased circling traffic, vehicle emissions, and emergency access blockage — **is** subject to CEQA analysis. The County has not disclosed any parking study.

E. Inadequate Fire Protection / Emergency Response and Wildfire Hazard

This site is served by the Los Angeles County Fire Department. Response times in the unincorporated North San Gabriel area depend on the closest staffed fire station, apparatus availability, and the condition of the local hydrant network. Emergency Medical Services response times in this area are documented to be at the upper end of NFPA 1710 / 1720 benchmarks during peak-demand periods.

While *City of Hayward v. Board of Trustees of California State University* (2012) 207

Cal.App.4th 446 holds that a project's **economic** demand for fire/police services is not, standing alone, a CEQA impact, that holding is narrow. Where degraded emergency response produces **physical environmental effects** — increased fire spread, increased risk of structure loss, increased risk of injury or death — those impacts remain analyzable under:

- CEQA Guidelines Appendix G § IX (Hazards and Hazardous Materials), which asks whether a project would "impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan";
- CEQA Guidelines Appendix G § XX (Wildfire), added in 2018, which asks whether a project would "expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires"; and
- *People ex rel. Bonta v. County of Lake* (2024) 105 Cal.App.5th 1222 (EIR for Lake County resort set aside for failing to disclose project's increased fire risk and evacuation impacts).

Site-specific concerns include: **(i) Fire apparatus access.** A single shared private driveway/fire lane serving five detached units must comply with California Fire Code Chapter 5, including CFC § 503 (minimum 20-foot unobstructed width, 13-foot 6-inch vertical clearance, all-weather surface, 28-foot minimum inside turning radius for ladder apparatus). No apparatus turning analysis or LACoFD will-serve letter has been disclosed. **(ii) Fire flow.** Required fire flow under California Fire Code Appendix B for five Type V residential structures will substantially exceed the demand of a single-family residence and requires hydrant capacity verification. **(iii) Evacuation.** The single shared driveway constitutes a **single point of egress** for five households — a configuration inconsistent with sound emergency evacuation planning. **(iv) Wildfire context.** While the immediate site is not within a Very High Fire Hazard Severity Zone, North San Gabriel and adjacent foothill communities have experienced repeated wildfire events; degraded emergency response capacity has cascading effects on the entire foothill response area.

F. Inadequate Law Enforcement Coverage

The unincorporated North San Gabriel area is served by the Los Angeles County Sheriff's Department, primarily out of Temple Station. Response times for routine and priority calls in unincorporated areas depend on patrol unit availability, which is allocated based on population, call volume, and beat assignment. Adding multiple new households to a small footprint without commensurate increase in patrol capacity is a foreseeable effect of cumulative infill development that the County has not disclosed.

To the extent that increased call volume produces secondary physical impacts (delayed response to emergencies, displaced patrol coverage from other beats, foreseeable increases in property crime in undermitigated multifamily configurations), those impacts remain analyzable under CEQA Guidelines Appendix G § XV ("Public Services"), which expressly asks whether the project would result in substantial adverse physical impacts

associated with **the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives**, including for fire protection and police protection.

G. Stormwater, Hydrology, and MS4 Compliance

The proposed development will substantially increase impervious surface area on the parcel. Under the Los Angeles County MS4 NPDES permit issued by the Los Angeles Regional Water Quality Control Board (Order R4-2021-0105), new and redevelopment projects must comply with Low Impact Development ("LID") and water quality treatment standards. No SUSMP/LID plan, drainage report, or hydrology calculation has been disclosed. *Communities for a Better Environment v. South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310, 320 (CEQA's informational mandate).

H. Construction Air Quality, Asbestos, and Lead

Demolition of the existing pre-1978 structure triggers:

- **SCAQMD Rule 1403 / 40 CFR Part 61, Subpart M (NESHAP) asbestos** survey and notification requirements;
- **HUD/EPA RRP rule (40 CFR Part 745)** lead-based paint risk assessment requirements;
- **SCAQMD Rule 403** fugitive dust controls.

The South Coast Air Basin remains in federal nonattainment for ozone and PM_{2.5}. Demolition-phase emissions are a documented contributor. *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 219–220 (substantial evidence required for air quality determinations).

I. Construction Noise

California Government Code § 65302(f) requires the Noise Element of the General Plan to address construction noise. County Code Chapter 12.08 governs noise standards. Construction of five detached structures within feet of occupied single-family homes will produce 12–18 months of percussive demolition, framing, and finishing noise. No Construction Noise Mitigation Plan has been disclosed.

J. Loss of Mature Trees / Oak Tree Permit Issues

The West San Gabriel Valley PASD imposes specific obligations regarding native oaks and mature canopy. No tree inventory, certified arborist report, or Oak Tree Permit determination under Title 22 Chapter 22.174 has been disclosed.

VI. THE COMMISSION MUST MAKE THE MANDATORY DENIAL FINDINGS UNDER GOVERNMENT CODE § 66474

Independent of CEQA, the Subdivision Map Act requires the Commission to **deny** a tentative map if it makes **any** of the seven findings listed in Government Code § 66474. *Friends of Riverside's Hills v. City of Riverside* (2008) 168 Cal.App.4th 743 (mandatory denial findings); 1975 Cal. Att'y Gen. Op. (predecessor statute interpretation incorporated by court).

On this record, multiple denial findings under § 66474 are supported:

- **§ 66474(a):** "The proposed map is not consistent with applicable general and specific plans" — see Section IV above;
- **§ 66474(b):** "The design or improvement of the proposed subdivision is not consistent with applicable general and specific plans" — single shared driveway/fire lane configuration is inconsistent with WSGVAP and PASD policies on access, form, and massing;
- **§ 66474(c):** "The site is not physically suitable for the type of development" — 0.4-acre R-1 parcel is not physically suitable for five detached condominium units below the 5,000 sq. ft. minimum lot area;
- **§ 66474(d):** "The site is not physically suitable for the proposed density of development" — same;
- **§ 66474(e):** "The design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat" — see Section V above;
- **§ 66474(f):** "The design of the subdivision or type of improvements is likely to cause serious public health problems" — inadequate water flow, inadequate fire access, inadequate emergency egress on a single private driveway, asbestos/lead-paint disturbance without disclosed mitigation;
- **§ 66474(g):** "The design of the subdivision or type of improvements will conflict with easements... acquired by the public at large for access through or use of property" — Arcadia Avenue right-of-way capacity for parking and circulation.

Government Code § 66473.5 also requires an affirmative finding of **general plan consistency**, which cannot be made on this record.

VII. PROCEDURAL DEFECTS AND FEDERAL DUE PROCESS CONCERNS

A. Inadequate Notice Under State and Federal Law

The Notice posted at the site is materially incomplete. It does not identify:

1. The full set of entitlements requested (whether a variance, density bonus, small lot modification, or parking modification is sought);

2. The applicant of record and any related entities;
3. The CEQA findings supporting the categorical exemption;
4. Whether County Fire, Public Works, and Building & Safety have issued conditions or comments;
5. The deadline and procedural mechanism for written comment submission prior to the hearing.

Notice must be "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane v. Central Hanover Bank & Trust Co.* (1950) 339 U.S. 306, 314 (federal Fourteenth Amendment due process). California has applied this constitutional minimum to land use actions affecting nearby property owners. *Horn v. County of Ventura* (1979) 24 Cal.3d 605, 612–615 (notice and hearing required for adjacent property owners affected by discretionary land use approvals); *Scott v. City of Indian Wells* (1972) 6 Cal.3d 541. As an adjacent property owner, I am entitled to notice that meaningfully identifies the action proposed, the entitlements requested, and the CEQA basis claimed.

B. Government Code § 65091

Government Code § 65091 establishes the noticing standard for hearings on residential development projects. The Notice posted at the site does not appear to meet that standard's substantive content requirements.

VIII. THE PLANNING COMMISSION'S PATTERN OF DISREGARDING ACTUAL COMMUNITY IMPACTS, AND THE FAILURE OF DISTRICT REPRESENTATION

This comment would be incomplete without naming a recurring pattern that this Commission and the Office of the Fifth District Supervisor have allowed to take root in the unincorporated communities of the West San Gabriel Valley.

A. The Commission's Standard of Review Has Drifted From the Statute

The Commission's role under the Subdivision Map Act, the County General Plan, and CEQA is not a ministerial rubber stamp. The Commission is charged with making **independent, substantial-evidence findings** on every tentative tract map presented to it (Gov. Code §§ 66473.5, 66474), and is required by CEQA to take a "hard look" at potential environmental impacts before relying on any categorical exemption. *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68. In practice, the residents of unincorporated North San Gabriel and the surrounding West San Gabriel Valley unincorporated islands — South San Gabriel, East Pasadena-East San Gabriel, San Pasqual, South Monrovia Islands, Whittier Narrows, and South El Monte Island — have watched project after project move through this Commission with categorical exemptions, undisclosed variances, and post-hoc

findings that were never tested against the lived reality of the affected streets.

The "actual community impacts" of projects like PRJ2021-002634 are not abstractions. They are the concrete, daily, physical conditions that the residents of Arcadia Avenue and surrounding blocks contend with: aging water mains that lose pressure when multiple homes draw simultaneously; a single-transformer secondary distribution that browns out during summer peak; saturated on-street parking that already produces routine sight-line conflicts and near-misses at driveway aprons; emergency response times that have lengthened year over year as call volume in unincorporated patrol beats has outpaced staffing; absent sidewalk, drainage, and tree-canopy maintenance; and a cumulative pattern of small-lot infill subdivisions that, taken together, are the same projects the County's own WSGVAP Draft PEIR concedes produce significant and unavoidable cumulative impacts. When the staff report on a project of this kind contains a Class 32 box checked and nothing more, **the Commission is not seeing the community**. It is seeing a paper file that has been engineered to avoid disclosure.

B. Failure of Fifth District Representation in the Unincorporated North San Gabriel Area

The unincorporated portion of North San Gabriel sits within the Fifth Supervisorial District, currently represented by Supervisor Kathryn Barger. The residents of this unincorporated island do not have a city council. They do not have a city planning department, a city public works department, or a city manager whose job is to walk these streets. **The County Supervisor is, functionally, our only elected representative on local land use, infrastructure, and public-service questions.** That structural reality places a heightened obligation on the Office of the Fifth District to show up, to respond to constituent correspondence, and to hold the Department of Regional Planning and the unincorporated-service departments accountable.

That obligation has not been met. The unincorporated North San Gabriel area has been allowed to deteriorate visibly over the past decade. Public right-of-way maintenance is inconsistent. Code enforcement on absent landlords and chronically substandard properties is sporadic. Street trees go unreplaced. Pavement and curb conditions on residential collectors, including Arcadia Avenue, have degraded materially. Sheriff's patrol coverage out of Temple Station is stretched thin across a large unincorporated geography. And projects like PRJ2021-002634 — which would convert a single-family parcel into five condominium units below the R-1 minimum lot area, on a street that cannot absorb the additional water, power, traffic, parking, and emergency-response demand — are advanced to public hearing without the Office of the Fifth District ever publicly identifying the obvious infrastructure deficit, requesting a Will-Serve letter, requesting a fire-flow analysis, or asking how this project will be reconciled with the cumulative impact findings in the County's own area plan.

Constituent voices in this unincorporated island have been raised in correspondence, in

community meetings, and in prior Commission comments on similar projects. They have not produced a meaningful response from the Office of the Fifth District. The residents of unincorporated North San Gabriel are not opposed to housing. They are opposed to the quiet practice of approving multi-unit infill projects on infrastructure that was sized for single-family use, while their elected representative declines to make the issues visible.

For purposes of this hearing, this Section is part of the administrative record. It is offered not as personal grievance, but as substantial evidence relevant to the § 15300.2(b) cumulative-impact analysis, to the Subdivision Map Act § 66474 mandatory denial findings, and to the public's reasonable expectation under the Fourteenth Amendment that a discretionary approval affecting their daily lives will be considered with actual attention to the conditions on the ground. *Mullane v. Central Hanover Bank & Trust Co.* (1950) 339 U.S. 306; *Horn v. County of Ventura* (1979) 24 Cal.3d 605.

The Commission has the authority, on this record, to break that pattern. I respectfully ask that it do so.

IX. RELIEF REQUESTED

For the foregoing reasons, I respectfully request that the Los Angeles County Regional Planning Commission take the following actions on June 3, 2026:

1. **Deny** Project No. PRJ2021-002634 by making one or more of the mandatory denial findings under Government Code § 66474, supported by the substantial evidence in this comment;
2. In the alternative, **continue** the matter and direct staff to:
 - a. **Vacate** the Class 32 categorical exemption determination;
 - b. **Prepare an Initial Study** consistent with CEQA Guidelines § 15063 evaluating, at a minimum: water supply (consistent with *Vineyard*); electrical service capacity; transportation and VMT (consistent with Guidelines § 15064.3 and *Mejia*); on-street parking displacement and resulting circulation impacts; fire access, fire flow, and emergency response (consistent with Appendix G §§ IX, XV, XX, and *Bonta v. County of Lake*); law enforcement service ratios; air quality, asbestos, and lead; hazardous materials; historical resources; hydrology and water quality; biological resources; and cumulative impacts;
 - c. **Disclose** in the public record any and all variances, density bonuses, small-lot modifications, parking exceptions, and PASD compliance determinations on which approval would depend;
 - d. **Obtain and publish** the County Fire Department's apparatus access analysis,

written fire flow determination, and hydrant verification;

e. **Obtain and publish** Will-Serve letters from the applicable water purveyor and Southern California Edison;

f. **Re-notice** the hearing with a Notice that complies with Government Code § 65091, *Horn v. County of Ventura* (1979) 24 Cal.3d 605, and *Mullane v. Central Hanover Bank & Trust Co.* (1950) 339 U.S. 306, and that accurately identifies the CEQA basis and entitlements requested;

3. **Preserve** all communications, e-mails, and internal staff notes concerning this project for the administrative record under Public Resources Code § 21167.6.

I expressly reserve all rights, including the right to petition for a writ of mandate under Public Resources Code §§ 21168 and 21168.5 and Code of Civil Procedure § 1094.5 should the Commission approve this project on the present record.

I respectfully request written confirmation that this comment has been received, made part of the administrative record, and transmitted to the Commissioners in advance of the June 3, 2026 hearing.

I intend to appear and testify at the hearing in person and reserve the right to submit additional comments and supporting exhibits up to and including the date of the hearing.

Thank you for your consideration.

Respectfully submitted,

Michael Karl McNeil, M.S., REP, RIHP, REPP/NREP, EMT-II 9163 Arcadia Avenue San Gabriel (Unincorporated North San Gabriel), California 91775 (626) 546-9384 | mike@mcneilsafetyconsulting.com

TABLE OF AUTHORITIES

California Statutes

- Cal. Pub. Res. Code §§ 21000 *et seq.* (CEQA)
- Cal. Pub. Res. Code § 21080.1 (CEQA findings)
- Cal. Pub. Res. Code § 21084.1 (Historical Resources)
- Cal. Pub. Res. Code § 21151.9 (Water Supply Assessments)
- Cal. Pub. Res. Code § 21159.25 (Statutory exemption for unincorporated infill)
- Cal. Pub. Res. Code §§ 21167.6, 21168, 21168.5 (administrative record; writ review)
- Cal. Gov. Code § 65091 (Notice of hearing)
- Cal. Gov. Code § 65302 (General Plan elements)

- Cal. Gov. Code § 65915 (Density Bonus Law)
- Cal. Gov. Code § 66473.5 (Subdivision Map Act — General Plan consistency)
- Cal. Gov. Code § 66474(a)–(g) (Subdivision Map Act — Mandatory denial findings)
- Cal. Water Code §§ 10910–10912 (Water Supply Assessments)
- Cal. Code Civ. Proc. § 1094.5 (Administrative mandamus)

California Regulations

- 14 Cal. Code Regs. § 15063 (Initial Study)
- 14 Cal. Code Regs. § 15064 (Determining significance)
- 14 Cal. Code Regs. § 15064.3 (Transportation / VMT)
- 14 Cal. Code Regs. § 15064.5 (Historical Resources)
- 14 Cal. Code Regs. § 15300.2 (Exceptions to categorical exemptions)
- 14 Cal. Code Regs. § 15332 (Class 32 Infill Development)
- 14 Cal. Code Regs. App'x G §§ IX, XV, XVII, XX (Initial Study checklist)
- L.A. County Code Title 22 §§ 22.52.100, 22.52.250, 22.120, 22.174, 22.194, 22.320 et seq. (PASD)

California Case Law

- *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086
- *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204
- *City of Hayward v. Board of Trustees of California State University* (2012) 207 Cal.App.4th 446
- *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98
- *Communities for a Better Environment v. South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310
- *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777
- *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859
- *Friends of Riverside's Hills v. City of Riverside* (2008) 168 Cal.App.4th 743
- *Horn v. County of Ventura* (1979) 24 Cal.3d 605
- *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692
- *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322
- *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68
- *People ex rel. Bonta v. County of Lake* (2024) 105 Cal.App.5th 1222
- *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903
- *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818
- *Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal.App.4th 694
- *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116
- *Scott v. City of Indian Wells* (1972) 6 Cal.3d 541
- *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182
- *Taxpayers for Accountable School Bond Spending v. San Diego Unified School*

District (2013) 215 Cal.App.4th 1013

- *Valley Advocates v. City of Fresno* (2008) 160 Cal.App.4th 1039
- *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412

Federal Authority

- U.S. Const. amend. XIV (Due Process)
- *Mullane v. Central Hanover Bank & Trust Co.* (1950) 339 U.S. 306
- 40 C.F.R. Part 61, Subpart M (NESHAP — Asbestos)
- 40 C.F.R. Part 745 (HUD/EPA Lead Renovation, Repair and Painting Rule)

Regulatory Standards

- California Fire Code Chapter 5; § 503 (fire apparatus access); § 504 (egress); Appendix B (fire flow)
- South Coast Air Quality Management District Rule 403 (fugitive dust)
- South Coast Air Quality Management District Rule 1403 (asbestos demolition)
- Los Angeles County MS4 NPDES Permit, LARWQCB Order R4-2021-0105
- ASTM E1527-21 (Phase I Environmental Site Assessment standard)
- NFPA 1710 / NFPA 1720 (emergency response time benchmarks)
- ITE Trip Generation Manual (most recent edition)

Enclosures (to be supplemented prior to hearing):

- Photographs of project site and surrounding context
- Site map showing 9163 Arcadia Avenue and 9072 E. Arcadia Avenue (subject parcel)
- Excerpts: Title 22 §§ 22.52.100, 22.52.250 (R-1 minimum lot area)
- Excerpts: 14 Cal. Code Regs. §§ 15300.2, 15332
- Excerpts: WSGVAP Draft PEIR significant and unavoidable impact findings

Michael McNeil, MS, RIH, REP

www.mcneilsafetyconsulting.com

CONFIDENTIALITY NOTICE -- This email is intended only for the person(s) named in the message header. Unless otherwise indicated, it contains information that is confidential, privileged and/or exempt from disclosure under applicable law. If you have received this message in error, please notify the sender of the error and delete the message. Thank you.

From: Michael McNeil <mike@mcneilsafetyconsulting.com>
Sent: Monday, May 11, 2026 11:11 AM
To: Michelle Lynch
Subject: Re: WRITTEN OPPOSITION AND OBJECTION TO PROJECT NO. PRJ2021-002634 Tentative Tract Map — 9072 E. Arcadia Avenue Unincorporated North San Gabriel, Los Angeles County, CA 91775

CAUTION: External Email. Proceed Responsibly.

Ms. Lynch and All Recipients:

This communication is a **formal legal demand**. It is sent in furtherance of, and is incorporated by reference into, my May 8, 2026 written opposition to Project No. PRJ2021-002634, and it shall be included in the administrative record of this matter pursuant to Public Resources Code § 21167.6. I expect, and will require, that this email is transmitted, in full and unredacted, to every member of the Regional Planning Commission, to County Counsel, and to each cc recipient identified above prior to the June 3, 2026 hearing.

The County's response to my opposition has been limited to an acknowledgment of receipt. That acknowledgment is **not** a substantive response to the substantial evidence and legal authority placed in the record on May 8, 2026, including the facial defect in the staff-level CEQA determination, the absence of mandatory findings under Public Resources Code § 21159.25, the triggering of the § 15300.2 exceptions, the project's inconsistency with County Code Title 22 and the West San Gabriel Valley Area Plan, and the Subdivision Map Act § 66474 mandatory denial findings now ripe for the Commission's consideration. The County is on notice that proceeding to a June 3 hearing on the present record exposes the County to writ relief, attorneys' fees, and reversal.

Each item below imposes an enforceable statutory obligation on the County. The County's failure to comply will be documented and used in subsequent administrative and judicial proceedings.

1. DEMAND FOR WRITTEN CONFIRMATIONS — FIVE (5) BUSINESS DAYS

I **demand** written confirmation, by reply email to all recipients of this thread, within **five (5) business days** of this email, of each of the following:

a. That my May 8, 2026 written opposition has been transmitted, **in full and unredacted**, to **each** member of the Regional Planning Commission, and that it will be included in the Commission's hearing packet for the June 3, 2026 hearing — with the date of transmittal

identified;

b. That the staff report for PRJ2021-002634 will be posted on Legistar and made publicly available **no later than 5:00 p.m. on May 20, 2026** (fourteen (14) calendar days prior to the hearing), consistent with Government Code § 65091 and Ralph M. Brown Act §§ 54954.2 and 54957.5;

c. The **complete and exhaustive** list of all entitlements being sought by the applicant, including but not limited to: any tentative tract map, parcel map, conditional use permit, variance, density bonus, small-lot subdivision modification, oak tree permit, hillside management exception, parking modification, PASD adjustment, lot line adjustment, and any waiver, exception, or incentive sought under State Density Bonus Law (Gov. Code § 65915 *et seq.*);

d. The **specific** CEQA determination on which staff intends to rely at the June 3 hearing, identified by Guidelines section and, if a statutory exemption is invoked, by Public Resources Code section, **together with** the written factual findings supporting that determination. A bare reference to a Class number, or a checked box on a Notice of Exemption form, will not suffice. *Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal.App.4th 694, 708;

e. Confirmation, with citation to authority, of whether the County is treating PRJ2021-002634 as a "ministerial" or "discretionary" approval for CEQA purposes;

f. The identity of the applicant of record, all parent and affiliated entities, all principals and directors, the engineer and surveyor of record on the tentative map, and any CEQA consultant retained for the project;

g. The names, dates, and substantive content of **all written comments** received from County Fire (including the Forestry / Land Development Unit), County Public Works, County Department of Public Health, the applicable water purveyor (will-serve), Southern California Edison (will-serve), and any other reviewing agency;

h. Confirmation that noticing for the June 3, 2026 hearing **fully complied** with Government Code § 65091, including radius mailing to all property owners within the statutory radius, posting at the project site, and newspaper publication of general circulation — with **production of** the radius mailing list, the affidavit of mailing, the affidavit of posting, and the proof of publication;

i. The procedural mechanism and deadline for submission of additional written comments prior to the hearing, and the procedural mechanism for in-person and remote (Zoom) public testimony at the June 3 hearing.

Silence or a non-responsive reply will be treated as a refusal to confirm and will be documented as such in the record.

2. CALIFORNIA PUBLIC RECORDS ACT REQUEST — TEN (10) DAY STATUTORY CLOCK; ROLLING PRODUCTION DEMANDED

This Section constitutes a formal request under the **California Public Records Act**, Government Code §§ 7920.000 *et seq.* (formerly §§ 6250 *et seq.*), and Article I, Section 3(b) of the California Constitution (the right of public access to information concerning the conduct of the people's business is a fundamental and necessary right). The statutory clock under Gov. Code § 7922.535 begins to run upon receipt of this email.

This request is **not limited** to records held by the Department of Regional Planning. It extends to **every** department, division, contractor, and officer of the County of Los Angeles, the Office of Supervisor Kathryn Barger (Fifth District), the Office of County Counsel, the Los Angeles County Fire Department, the Los Angeles County Department of Public Works, and any other County entity that has processed, reviewed, commented on, or communicated regarding Project No. PRJ2021-002634 at 9072 E. Arcadia Avenue, unincorporated North San Gabriel, Los Angeles County.

I demand production in **electronic form** (PDF or native file format) by email to the address below, consistent with Gov. Code §§ 7922.530(a) and 7922.570.

Records Demanded

1. The **complete application file** for PRJ2021-002634, including all original and amended applications, the tentative tract map(s), site plans, elevations, landscape plans, grading plans, photometric plans, and any conditional use permit, variance, density bonus, oak tree permit, or related entitlement applications, with the **complete** approval and signature history;
2. **All** staff reports, draft staff reports, internal review memoranda, routing slips, and version histories concerning the project from January 1, 2021 to the date of production;
3. The **complete CEQA file** for the project, including: the Initial Study (if any); the Notice of Exemption (if any); the categorical exemption worksheet, checklist, and all supporting factual findings; all technical studies (traffic, noise, air quality, hydrology, geotechnical, Phase I Environmental Site Assessment, asbestos survey, lead-based paint risk assessment, oak tree report, historical resources evaluation, biological resources report, water supply assessment) relied upon, prepared by, or submitted to the County; all email and written correspondence between County staff and the applicant or applicant's consultants regarding CEQA;
4. **All written comments** received from County Fire (including the Forestry / Land Development Unit), County Public Works (Land Development Division, Building & Safety, and Traffic & Lighting Division), County Department of Public Health, County Geotechnical and Materials Engineering Division, and any other reviewing County agency;

5. **All written correspondence** (including email, text messages, and any other electronically stored communication) between Department of Regional Planning staff and the applicable water purveyor for the project site, and any **Will-Serve letter or capacity confirmation** issued by that purveyor — including any fire flow analysis or hydrant capacity verification;
6. **All written correspondence** (including email) between Department of Regional Planning staff and Southern California Edison concerning electrical service capacity, and any **Will-Serve letter or transformer load study**;
7. **All written correspondence** (including email) between Department of Regional Planning staff and the Los Angeles County Fire Department concerning fire apparatus access, fire flow, hydrant capacity, evacuation, and Fuel Modification Plan review;
8. **All hydrology and stormwater documents**, including SUSMP/LID plans, drainage reports, and any communications with the Los Angeles Regional Water Quality Control Board (Region 4) regarding MS4 compliance under Order R4-2021-0105;
9. The **radius mailing list** (assessor parcel numbers and mailing addresses) used to notice the June 3, 2026 hearing, the **affidavit of mailing**, the **affidavit of posting** at the project site, and the **proof of newspaper publication**;
10. **All written and emailed public comments** received concerning PRJ2021-002634 from any member of the public, neighborhood association, community group, or homeowner;
11. **All internal correspondence** (email, memoranda, text messages, instant messages, Microsoft Teams chats, Slack messages, and any other written communication) between or among Department of Regional Planning staff, County Counsel, the Office of Supervisor Kathryn Barger (Fifth District), and any other County official, regarding PRJ2021-002634, from January 1, 2021 to the date of production;
12. **All records reflecting any pre-application meetings, design review meetings, or informal consultations** between the applicant (or applicant's representatives) and County staff concerning the project, including sign-in sheets, meeting notes, agendas, calendar invitations, and follow-up correspondence;
13. The County's **complete records** regarding the West San Gabriel Valley Planning Area Standards District ("PASD") determination for the project site, including any tree inventory, certified arborist report, and Oak Tree Permit determination under Title 22 Chapter 22.174;
14. **Any and every** traffic study, trip generation analysis, VMT analysis, sight-distance analysis, queueing analysis, or transportation memorandum prepared for or relied upon by the County in connection with the project; and any communications with Los Angeles County Public Works — Traffic and Lighting Division;
15. The **complete chain of custody** of the project file, including all reviewer initials, dates, and any "hold," "incomplete," or "deemed complete" notations under the Permit Streamlining Act (Gov. Code §§ 65920 *et seq.*);
16. **All records** concerning campaign contributions, political contributions, gifts, or

other things of value made by the applicant, the applicant's principals, the applicant's affiliated entities, or any consultant or counsel for the applicant, to any member of the Regional Planning Commission, the Board of Supervisors, or their staffs, from January 1, 2020 to the date of production, to the extent any such records are maintained by the County or are required to be disclosed under the Political Reform Act (Gov. Code §§ 81000 *et seq.*).

Statutory Timing — Demand for Rolling Production

The County has **ten (10) calendar days** under Gov. Code § 7922.535 to determine whether the request seeks identifiable, non-exempt records and to provide written notice of that determination. The County may extend by an additional fourteen (14) days only upon written notice citing one of the four specified "unusual circumstances" in § 7922.535(b).

Given that the staff report is scheduled to be made publicly available on or about **May 20, 2026**, I **demand rolling production beginning immediately**, with all responsive non-exempt records produced **no later than 5:00 p.m. on May 19, 2026**. Production of the case file only after the June 3 hearing would render the right of public participation meaningless and would defeat the informational purpose of CEQA. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 428–434; *Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 879. The County's duty to assist the requester is mandatory, not discretionary. Gov. Code § 7922.600.

Withholding and Redaction Requirements

If the County contends that **any** responsive record is exempt from disclosure, I demand a **written justification for each withholding**, identifying the specific statutory exemption claimed, the specific factual basis for the exemption, and a privilege log identifying the date, author, recipient, and subject matter of each withheld document. Gov. Code §§ 7922.000, 7922.540. Records that are partially exempt **must** be produced with the exempt portions redacted and the non-exempt portions disclosed. Gov. Code § 7922.525(b). Blanket exemption claims will not be accepted.

Fees

This request is made for **non-commercial** purposes. The County may charge only for the direct costs of duplication, not for staff time spent searching, reviewing, or redacting records. Gov. Code § 7922.530(a); *North County Parents Organization v. Department of Education* (1994) 23 Cal.App.4th 144, 148. To the extent any fee is asserted, I demand a written itemization in advance and an opportunity to narrow the request, consistent with Gov. Code § 7922.600.

Attorneys' Fees Notice

The County is hereby placed on notice that, in the event of any wrongful denial, delay, or

refusal to produce non-exempt records, I will seek **attorneys' fees and costs under Gov. Code § 7923.115** (formerly § 6259(d)), which mandates an award of fees to the prevailing requester in a successful PRA enforcement action. *Filarsky v. Superior Court* (2002) 28 Cal.4th 419; *Bernardi v. County of Monterey* (2008) 167 Cal.App.4th 1379.

3. LITIGATION HOLD AND RECORDS PRESERVATION DEMAND

Effective **immediately** upon receipt of this email, the County of Los Angeles, its Department of Regional Planning, the Office of County Counsel, the Office of Supervisor Kathryn Barger (Fifth District), the Los Angeles County Fire Department, the Los Angeles County Department of Public Works, the Los Angeles County Department of Public Health, the Office of the Executive Officer of the Board of Supervisors, and **every other** County department, division, officer, employee, contractor, and consultant in possession, custody, or control of records concerning PRJ2021-002634 are placed on **formal litigation hold**.

The County is on notice to **preserve, intact and unaltered, all records** relating to the project, including but not limited to email, text messages, instant messages, Microsoft Teams chats, Slack messages, calendar entries, voicemail, photographs, GIS files, AutoCAD files, PDF markups, draft documents, file notes, sticky notes, telephone logs, and any other electronically stored information ("ESI") and physical records. This litigation hold includes all metadata associated with the foregoing.

Any auto-delete, retention-purge, archive-and-destroy, or routine destruction policy that would otherwise apply to these records is to be **immediately suspended** with respect to PRJ2021-002634 from the date of this notice forward and remains suspended until the matter is finally resolved, including the expiration of all writ and appeal periods. *Cedars-Sinai Medical Center v. Superior Court* (1998) 18 Cal.4th 1; *Williams v. Russ* (2008) 167 Cal.App.4th 1215 (spoliation sanctions).

The County is further on notice that the destruction, alteration, concealment, or loss of any record covered by this litigation hold will be presented to the court in any subsequent writ proceeding as evidence of **spoliation**, supporting evidentiary inferences adverse to the County, monetary sanctions, and, in egregious cases, terminating sanctions.

4. DEMAND FOR CONTINUANCE OF THE JUNE 3, 2026 HEARING

The June 3, 2026 hearing **cannot lawfully proceed** on the present record. The CEQA determination is facially defective. The Subdivision Map Act findings are unsupported. The required disclosures of public service capacity (water, power, fire, law enforcement) have not been made. Material entitlements appear to be undisclosed on the public Notice. Production of the case file in response to this PRA request will not occur until shortly before the hearing — depriving the public of the meaningful opportunity to review and

comment that CEQA and Due Process require.

I **demand** that staff recommend, and the Commission grant, a **continuance** of the June 3, 2026 hearing of not less than sixty (60) days, to permit:

a. Preparation and circulation of an Initial Study under CEQA Guidelines § 15063; b. Production of the complete case file pursuant to the PRA request in Section 2 above; c. Disclosure of the complete list of entitlements requested; d. Issuance of Will-Serve letters from the applicable water purveyor and Southern California Edison; e. Issuance of the County Fire Department's written apparatus access analysis, fire flow determination, and hydrant verification; f. Re-noticing of the hearing in compliance with Government Code § 65091, *Horn v. County of Ventura* (1979) 24 Cal.3d 605, and *Mullane v. Central Hanover Bank & Trust Co.* (1950) 339 U.S. 306.

A refusal to continue, in the face of the substantial evidence already in the record and the disclosure deficiencies identified herein, will be documented as a knowing election to proceed on an inadequate record, with full notice of the legal consequences.

5. EXPRESS RESERVATION OF ALL RIGHTS AND REMEDIES

Nothing in this email constitutes a waiver of any right, remedy, claim, or defense. I expressly reserve, without limitation, the following:

- a. The right to submit additional written comments and supplemental evidence up to and including the date of the June 3, 2026 hearing, and to introduce evidence at the hearing itself;
- b. The right to administratively appeal any Commission decision to the Los Angeles County Board of Supervisors under L.A. County Code Title 22 § 22.220.060 *et seq.*, or any successor provision;
- c. The right to **petition for a writ of mandate** under Public Resources Code §§ 21168 and 21168.5, and Code of Civil Procedure § 1094.5, including the right to seek a preliminary injunction or stay against any project approval issued on the present record;
- d. The right to seek **attorneys' fees and costs under Code of Civil Procedure § 1021.5** (private attorney general doctrine);
- e. The right to seek **attorneys' fees and costs under Gov. Code § 7923.115** (PRA enforcement);
- f. **All rights** under the Ralph M. Brown Act (Gov. Code §§ 54950 *et seq.*) regarding Commission deliberations, agenda content, and public disclosure of writings distributed to a majority of the Commission;

g. The right to file complaints with the California Attorney General's Office, the Fair Political Practices Commission, the State Auditor, and any other appropriate oversight body in the event of evidence of procedural irregularity, conflict of interest, or violation of California law in the processing of PRJ2021-002634;

h. **All claims** of every nature, whether known or unknown, arising out of or related to the processing, approval, or denial of PRJ2021-002634.

6. CLOSING

This is a formal legal demand. It is sent in good faith and in furtherance of the public's right to participate meaningfully in the discretionary land use approval process. The County's response — or non-response — will be documented in the administrative record and will form the evidentiary basis for any subsequent administrative appeal or writ proceeding.

I expect:

- A substantive written reply to Section 1 within **five (5) business days**;
- A formal PRA determination under Section 2 within **ten (10) calendar days**, with **rolling production** beginning immediately and complete production by **May 19, 2026**;
- Written acknowledgment of the litigation hold in Section 3;
- A staff recommendation and Commission action on the continuance demanded in Section 4.

I am available by phone at **(626) 546-9384** should the County wish to discuss any of the foregoing. Any oral discussion will be promptly confirmed in writing and made part of the record.

Govern yourselves accordingly.

Respectfully,

From: Michelle Lynch <mlynch@planning.lacounty.gov>

Sent: Monday, May 11, 2026 9:50 AM

To: Michael McNeil <mike@mcneilsafetyconsulting.com>

Cc: EDL-DRP BU-S Commission Services <commission@planning.lacounty.gov>; EDL-DRP BU-D Executive Office <executive@planning.lacounty.gov>; Barger, Kathryn <Kathryn@bos.lacounty.gov>; EDL-DRP BU-D Advance Planning Public Contact Email <ap@planning.lacounty.gov>; Joshua Huntington <jhuntington@planning.lacounty.gov>

Subject: RE: WRITTEN OPPOSITION AND OBJECTION TO PROJECT NO. PRJ2021-002634 Tentative Tract Map — 9072 E. Arcadia Avenue Unincorporated North San Gabriel, Los Angeles County, CA 91775

Greetings, Mr. McNeil,

We received your letter of opposition and will add it to the public record. A copy of the staff report will be available two weeks before the public hearing. Please feel free to check the Legistar link: <https://.bit.ly/PRJ2021-002634> for updates or contact me directly if you have any questions. Thank you.

Best Regards,

MICHELLE LYNCH (she/her/hers)
PRINCIPAL PLANNER, Subdivisions

Office: (213) 974-6433 • Direct: (213) 893-7005

Email: mlynch@planning.lacounty.gov

From: Michael McNeil <mike@mcneilsafetyconsulting.com>

Sent: Friday, May 8, 2026 8:37 AM

To: planning@planning.lacounty.gov; Michelle Lynch <mlynch@planning.lacounty.gov>

Cc: EDL-DRP BU-S Commission Services <commission@planning.lacounty.gov>; EDL-DRP BU-D Executive Office <executive@planning.lacounty.gov>; Barger, Kathryn <Kathryn@bos.lacounty.gov>; EDL-DRP BU-D Advance Planning Public Contact Email <ap@planning.lacounty.gov>

Subject: WRITTEN OPPOSITION AND OBJECTION TO PROJECT NO. PRJ2021-002634 Tentative Tract Map — 9072 E. Arcadia Avenue Unincorporated North San Gabriel, Los Angeles County, CA 91775

CAUTION: External Email. Proceed Responsibly.

May 8, 2026

**RE: WRITTEN OPPOSITION AND OBJECTION TO PROJECT NO. PRJ2021-002634
Tentative Tract Map — 9072 E. Arcadia Avenue Unincorporated North San Gabriel, Los Angeles County, CA 91775 (West San Gabriel Valley Planning Area) Public Hearing:
June 3, 2026, 9:00 a.m., Hall of Records, Room 150**

Dear Ms. Lynch and Honorable Commissioners:

I am the owner-occupant of 9163 Arcadia Avenue, located in unincorporated North San Gabriel directly across from the proposed project site. I submit this opposition for inclusion in the administrative record of Project No. PRJ2021-002634 and request that the Regional Planning Commission **deny** the proposed Tentative Tract Map, **vacate** the staff-level CEQA exemption determination, and **make the mandatory findings of denial** required by Government Code § 66474 of the Subdivision Map Act.

I write in my individual capacity as a directly affected neighbor. For the record, I am a credentialed environmental and occupational health professional with more than fifteen years of experience in environmental compliance, industrial hygiene, stormwater management, hazardous materials, and CEQA/NEPA implementation. The technical observations below are offered to satisfy the "fair argument" threshold for full environmental review under *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.

I. PROJECT AS NOTICED

The Notice of Public Hearing posted at the project site identifies the following:

- A Tentative Tract Map authorizing creation of **five (5) detached condominium units** on a project area of **approximately 0.4 acres** (≈17,424 sq. ft.);
- All five units served by **a single shared private driveway and fire lane** connecting to Arcadia Avenue;
- Demolition of the existing single-family residence (a 4-bedroom, 2-bath, ~2,678 sq. ft. structure last sold February 2020 for \$2.2 million);
- A staff CEQA determination of **Class 32 Categorical Exemption** (Infill Development) under 14 Cal. Code Regs. § 15332.

The site is in the **unincorporated** area of Los Angeles County (North San Gabriel) within the West San Gabriel Valley Planning Area. The applicable base zoning is **R-1 (Single Family Residence)** under County Code Title 22.

II. THE STAFF CEQA DETERMINATION IS LEGALLY DEFECTIVE ON ITS FACE

A. Class 32 (CEQA Guidelines § 15332) Cannot Apply to Projects in Unincorporated County Areas

The Notice identifies the CEQA basis as a "Class 32 Categorical Exemption" under 14 Cal. Code Regs. § 15332. By its plain text, that exemption is unavailable to this project.

CEQA Guidelines § 15332(b) requires that the project occur "**within city limits on a project site of no more than five acres substantially surrounded by urban uses.**" The project site is in **unincorporated** Los Angeles County, North San Gabriel. It is not within any incorporated city limits. The plain-language requirement of subsection (b) is not satisfied, and Class 32 is unavailable as a matter of law. *See Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal.App.4th 694, 708 (categorical exemption findings must be supported in the record before approval).

The California Legislature recognized this exact gap and enacted **Public Resources Code § 21159.25** (effective January 1, 2019; A.B. 1804) as the parallel statutory exemption for certain multifamily housing in unincorporated county areas. Section 21159.25 imposes materially different and more demanding criteria than Class 32, including: (i) the project must qualify as a "residential or mixed-use housing project" with at least two-thirds residential square footage; (ii) the site must be "wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau" (Pub. Res. Code § 21159.25(b)(7)); (iii) the parcel must be substantially surrounded by "qualified urban uses" (§ 21159.25(b)(3)); and (iv) several additional infrastructure, hazard, and environmental prerequisites not embedded in Class 32. **None of these findings appear** on the Notice or in any documentation publicly disclosed for this project.

The Commission cannot cure this defect by re-labeling the determination at the hearing. CEQA findings must be supported by substantial evidence in the record before the decision is made, and the public must have a meaningful opportunity to review and comment on the actual basis claimed. *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1105; *Save Our Big Trees, supra*, 241 Cal.App.4th at 708; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75. CEQA's informational purpose "is not satisfied by simply stating information will be provided in the future." *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 431.

Requested action: Withdraw the Class 32 determination, prepare a properly noticed Initial Study under CEQA Guidelines § 15063, and re-notice the hearing.

B. Even If the County Intended to Invoke PRC § 21159.25, the Record Does Not Support the Required Findings

Section 21159.25 is not self-executing. It requires the lead agency to make written findings supported by substantial evidence that **each** of the statutory criteria is satisfied. No such findings have been disclosed to the public. The defect is not curable by post-hoc explanation at the hearing podium. *Save Our Big Trees, supra*, 241 Cal.App.4th 694; *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 138 (CEQA review must precede

project commitment).

III. THE § 15300.2 EXCEPTIONS INDEPENDENTLY DEFEAT ANY CATEGORICAL EXEMPTION

Even assuming, *arguendo*, that any categorical exemption could apply, this project triggers **multiple** exceptions under 14 Cal. Code Regs. § 15300.2, each of which **independently** bars its use.

The applicable legal standard is the "fair argument" test. Under *No Oil*, when there is **any substantial evidence** that a project **may** have a significant environmental impact, an EIR must be prepared, even where contrary evidence exists. *No Oil, supra*, 13 Cal.3d at 83 ("[a]n effect on the environment need not be 'momentous' to meet the CEQA test for significance; it is enough that the impacts are 'not trivial.'"). The fair argument standard creates a "low threshold" favoring environmental review. *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928. *Berkeley Hillside, supra*, 60 Cal.4th 1086 holds that the fair argument standard governs whether unusual circumstances create a reasonable possibility of significant impact under § 15300.2(c).

A. § 15300.2(b) — Cumulative Impact

The County's **own** programmatic environmental record on the West San Gabriel Valley Area Plan ("WSGVAP") expressly identifies **significant and unavoidable cumulative impacts** in **Aesthetics, Air Quality, Biological Resources, Cultural Resources, Noise, and Transportation**. The Commission cannot, consistent with § 15300.2(b), exempt this project from review when the County's own Draft PEIR concedes that successive small-lot infill subdivisions in this Planning Area are cumulatively significant. *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 117–120; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718–722 (cumulative impacts may not be dismissed because individual project's contribution is small).

B. § 15300.2(c) — Unusual Circumstances

The two-pronged test of *Berkeley Hillside* is satisfied. **Prong one:** the project differs materially from the typical Class 32 prototype — five detached units on approximately 0.4 acres, a density of roughly 12.5 dwelling units per acre on a parcel zoned R-1, where Title 22 § 22.52.100 sets a 5,000 sq. ft. minimum lot area. The proposed individual lot footprints would average roughly 3,485 sq. ft. — **below** the R-1 minimum — on a substreet served only by a private driveway/fire lane. **Prong two:** there is a reasonable possibility of significant impacts identified throughout this letter, including degraded emergency response, water and power service inadequacy, traffic and on-street parking displacement, asbestos and lead-paint disturbance, and stormwater quality degradation.

C. § 15300.2(f) — Historical Resources

Demolition of the substantial pre-1978 single-family residence at 9072 Arcadia Avenue triggers the requirement to evaluate whether the structure qualifies as a "historical resource" under Public Resources Code § 21084.1 and CEQA Guidelines § 15064.5. *Valley Advocates v. City of Fresno* (2008) 160 Cal.App.4th 1039 (historical resources analysis cannot be avoided through categorical exemptions). No such evaluation has been disclosed.

D. § 15300.2(e) — Hazardous Waste / Adjacent Hazards

Demolition of an older residential structure within a dense residential corridor without a documented Phase I Environmental Site Assessment (ASTM E1527-21), asbestos survey under SCAQMD Rule 1403 / 40 CFR Part 61 Subpart M (NESHAP), or lead-based paint risk assessment under HUD/EPA Lead Renovation, Repair and Painting Rule (40 CFR Part 745) falls outside the "environmentally benign" character that Class 32 is intended to capture.

IV. THE PROJECT IS INCONSISTENT WITH THE GENERAL PLAN AND TITLE 22 ZONING — DEFEATING § 15332(a) AND § 21159.25 ALIKE

Class 32 and PRC § 21159.25 each require the project to be **consistent with the applicable general plan designation and all applicable general plan policies, as well as with applicable zoning designation and regulations**. This project is not. A project's inconsistency with local plans and policies adopted to mitigate environmental harm constitutes a significant impact under CEQA. *Pocket Protectors, supra*, 124 Cal.App.4th at 929; *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777, 782; *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 874.

A. R-1 Density and Lot Size

Under County Code Title 22 § 22.52.100/22.52.250, the R-1 zone requires a minimum lot area of **5,000 sq. ft. per lot**. A five-unit detached subdivision on approximately 17,424 sq. ft. of gross site area produces individual parcels well below this floor. The project as described requires either (i) variances under Chapter 22.194, (ii) a density bonus under Chapter 22.120 / Government Code § 65915, or (iii) a small-lot subdivision modification — **none of which are disclosed on the public Notice**, and none of which can be reconciled with a "consistent with applicable zoning" finding.

B. WSGV Planning Area Standards District ("PASD")

The site falls within the West San Gabriel Valley PASD framework, which imposes additional standards on form, massing, façade composition, biological resources, and significant ridgelines. Compliance has not been demonstrated.

C. Setback, Yard, and Parking

R-1 standards require a 20-foot front yard, 5-foot interior side yards, 15-foot rear yards, and **two covered parking spaces per single-family residence**. A five-unit detached subdivision on a single shared driveway raises substantial questions whether each individual lot can satisfy all envelope standards plus the covered-parking requirement and on-site guest parking. No site plan, parking study, or yard-setback table accompanies the Notice.

V. THE PROJECT WILL CAUSE SIGNIFICANT, UNMITIGATED IMPACTS ON LOCAL INFRASTRUCTURE — REQUIRING FULL ENVIRONMENTAL REVIEW

This Section identifies specific physical infrastructure deficiencies on Arcadia Avenue and in the surrounding North San Gabriel neighborhood that, individually and cumulatively, raise a fair argument of significant environmental impact. CEQA Guidelines § 15064(d) makes clear that direct **and reasonably foreseeable indirect physical changes in the environment** caused by a project must be analyzed.

A. Inadequate Water Supply and Distribution Infrastructure

The existing water main and service infrastructure on Arcadia Avenue was sized for low-density single-family residential use, not multifamily condominium tract development.

CEQA's controlling water supply authority is *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412. *Vineyard* requires that the lead agency: (i) identify likely water sources for the project; (ii) demonstrate a "reasonable likelihood" that water will be available; (iii) disclose uncertainties; and (iv) analyze the impacts of supplying that water. *Id.* at 431–434. "[S]peculative sources and unrealistic allocations ('paper water') are insufficient bases for decision-making under CEQA." *Id.* at 432. Earlier appellate decisions, including *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182 and *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, hold that an EIR must analyze whether the local water purveyor can in fact deliver water to the project.

Here, the staff CEQA determination contains **no Water Supply Assessment, no purveyor will-serve letter, no fire-flow analysis, and no main-capacity calculation** for adding five new residential service connections plus required fire suppression demand to a residential block presently served by aging infrastructure. The Commission cannot make the threshold consistency or "environmentally benign" findings required for any infill exemption without this record.

Additionally, demand from the project triggers obligations under Water Code §§ 10910–10912 and Public Resources Code § 21151.9 (Water Supply Assessment requirements for

projects subject to CEQA). The County's failure to consult with the applicable water purveyor, and to disclose pressure, flow, and main-size data, deprives the public and the Commission of the disclosure required by *Vineyard*.

B. Inadequate Electrical Power Infrastructure

The neighborhood's electrical distribution infrastructure — pole-mounted transformers, secondary service drops, and feeder capacity — was sized for the existing single-family residential land use. Adding five condominium units (each with its own panel, HVAC, EV charging, and modern plug load) on a single 0.4-acre lot constitutes a foreseeable, material increase in electrical load. The Notice does not include a Southern California Edison (SCE) will-serve letter, transformer load study, or service upgrade plan.

CEQA Guidelines Appendix G § VI ("Energy") requires analysis of whether a project will "result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources" or "conflict with or obstruct a state or local plan for renewable energy or energy efficiency." The Initial Study Appendix G checklist was added to expressly require energy impacts analysis. Without an SCE service capacity disclosure, the County cannot make a substantial evidence finding that energy infrastructure can support the increased load — a foreseeable indirect physical effect under CEQA Guidelines § 15064(d).

C. Significant Traffic and Vehicle Miles Traveled (VMT) Impacts

Arcadia Avenue is a residential collector street with limited curb width, no dedicated turn lanes, and existing weekday/weekend congestion. The conversion of a single-family residence (estimated ~10 daily vehicle trips per ITE Trip Generation Manual) to a **five-unit condominium development** (roughly 30–45 daily trips, plus construction-phase truck traffic) constitutes a material increase.

The controlling case for traffic impact analysis at the categorical exemption / MND stage is *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322. In *Mejia*, the Second District Court of Appeal **set aside a 21-lot subdivision approval** in the Sunland area where the City of Los Angeles had relied on a mitigated negative declaration without full EIR review. The court held that public comments and the absence of a careful traffic study supported a **fair argument** of significant traffic impacts on a residential collector street — directly analogous to the situation on Arcadia Avenue.

Under SB 743 (Statutes 2013) and CEQA Guidelines § 15064.3 (effective July 1, 2020), the Vehicle Miles Traveled (VMT) metric replaced Level of Service (LOS) as the primary CEQA transportation impact metric. Notwithstanding the VMT framework, **physical safety effects** of project-induced traffic — turning conflicts, queuing, driveway sight distance, and emergency access — remain analyzable under CEQA Guidelines § 15064.3(b)(4) and Appendix G § XVII. No traffic study, sight-distance analysis, or queueing analysis has been

disclosed.

D. On-Street Parking Displacement

Arcadia Avenue presently experiences saturated on-street parking conditions during evening and weekend hours due to existing single-family residences with limited on-site parking. A five-unit condominium with a single shared driveway will materially increase on-street parking demand:

- **Construction phase:** contractor trucks, subcontractor vehicles, dumpsters, portable toilets, and material deliveries will displace existing residential on-street parking for a period likely exceeding 12–18 months.
- **Operational phase:** residents and guests will compete for limited curb space; the project's "5 detached condos on shared driveway" configuration suggests insufficient on-site guest parking.

While *Taxpayers for Accountable School Bond Spending v. San Diego Unified School District* (2013) 215 Cal.App.4th 1013 holds that loss of on-street parking is **not by itself** a CEQA impact, parking displacement that produces secondary physical impacts — increased circling traffic, vehicle emissions, and emergency access blockage — **is** subject to CEQA analysis. The County has not disclosed any parking study.

E. Inadequate Fire Protection / Emergency Response and Wildfire Hazard

This site is served by the Los Angeles County Fire Department. Response times in the unincorporated North San Gabriel area depend on the closest staffed fire station, apparatus availability, and the condition of the local hydrant network. Emergency Medical Services response times in this area are documented to be at the upper end of NFPA 1710 / 1720 benchmarks during peak-demand periods.

While *City of Hayward v. Board of Trustees of California State University* (2012) 207 Cal.App.4th 446 holds that a project's **economic** demand for fire/police services is not, standing alone, a CEQA impact, that holding is narrow. Where degraded emergency response produces **physical environmental effects** — increased fire spread, increased risk of structure loss, increased risk of injury or death — those impacts remain analyzable under:

- CEQA Guidelines Appendix G § IX (Hazards and Hazardous Materials), which asks whether a project would "impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan";
- CEQA Guidelines Appendix G § XX (Wildfire), added in 2018, which asks whether a project would "expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires"; and
- *People ex rel. Bonta v. County of Lake* (2024) 105 Cal.App.5th 1222 (EIR for Lake County resort set aside for failing to disclose project's increased fire risk and

evacuation impacts).

Site-specific concerns include: **(i) Fire apparatus access.** A single shared private driveway/fire lane serving five detached units must comply with California Fire Code Chapter 5, including CFC § 503 (minimum 20-foot unobstructed width, 13-foot 6-inch vertical clearance, all-weather surface, 28-foot minimum inside turning radius for ladder apparatus). No apparatus turning analysis or LACoFD will-serve letter has been disclosed. **(ii) Fire flow.** Required fire flow under California Fire Code Appendix B for five Type V residential structures will substantially exceed the demand of a single-family residence and requires hydrant capacity verification. **(iii) Evacuation.** The single shared driveway constitutes a **single point of egress** for five households — a configuration inconsistent with sound emergency evacuation planning. **(iv) Wildfire context.** While the immediate site is not within a Very High Fire Hazard Severity Zone, North San Gabriel and adjacent foothill communities have experienced repeated wildfire events; degraded emergency response capacity has cascading effects on the entire foothill response area.

F. Inadequate Law Enforcement Coverage

The unincorporated North San Gabriel area is served by the Los Angeles County Sheriff's Department, primarily out of Temple Station. Response times for routine and priority calls in unincorporated areas depend on patrol unit availability, which is allocated based on population, call volume, and beat assignment. Adding multiple new households to a small footprint without commensurate increase in patrol capacity is a foreseeable effect of cumulative infill development that the County has not disclosed.

To the extent that increased call volume produces secondary physical impacts (delayed response to emergencies, displaced patrol coverage from other beats, foreseeable increases in property crime in undermitigated multifamily configurations), those impacts remain analyzable under CEQA Guidelines Appendix G § XV ("Public Services"), which expressly asks whether the project would result in substantial adverse physical impacts associated with **the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives**, including for fire protection and police protection.

G. Stormwater, Hydrology, and MS4 Compliance

The proposed development will substantially increase impervious surface area on the parcel. Under the Los Angeles County MS4 NPDES permit issued by the Los Angeles Regional Water Quality Control Board (Order R4-2021-0105), new and redevelopment projects must comply with Low Impact Development ("LID") and water quality treatment standards. No SUSMP/LID plan, drainage report, or hydrology calculation has been disclosed. *Communities for a Better Environment v. South Coast Air Quality Mgmt.*

Dist. (2010) 48 Cal.4th 310, 320 (CEQA's informational mandate).

H. Construction Air Quality, Asbestos, and Lead

Demolition of the existing pre-1978 structure triggers:

- **SCAQMD Rule 1403 / 40 CFR Part 61, Subpart M (NESHAP) asbestos** survey and notification requirements;
- **HUD/EPA RRP rule (40 CFR Part 745)** lead-based paint risk assessment requirements;
- **SCAQMD Rule 403** fugitive dust controls.

The South Coast Air Basin remains in federal nonattainment for ozone and PM_{2.5}. Demolition-phase emissions are a documented contributor. *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 219–220 (substantial evidence required for air quality determinations).

I. Construction Noise

California Government Code § 65302(f) requires the Noise Element of the General Plan to address construction noise. County Code Chapter 12.08 governs noise standards. Construction of five detached structures within feet of occupied single-family homes will produce 12–18 months of percussive demolition, framing, and finishing noise. No Construction Noise Mitigation Plan has been disclosed.

J. Loss of Mature Trees / Oak Tree Permit Issues

The West San Gabriel Valley PASD imposes specific obligations regarding native oaks and mature canopy. No tree inventory, certified arborist report, or Oak Tree Permit determination under Title 22 Chapter 22.174 has been disclosed.

VI. THE COMMISSION MUST MAKE THE MANDATORY DENIAL FINDINGS UNDER GOVERNMENT CODE § 66474

Independent of CEQA, the Subdivision Map Act requires the Commission to **deny** a tentative map if it makes **any** of the seven findings listed in Government Code § 66474. *Friends of Riverside's Hills v. City of Riverside* (2008) 168 Cal.App.4th 743 (mandatory denial findings); 1975 Cal. Att'y Gen. Op. (predecessor statute interpretation incorporated by court).

On this record, multiple denial findings under § 66474 are supported:

- **§ 66474(a)**: "The proposed map is not consistent with applicable general and specific plans" — see Section IV above;

- **§ 66474(b):** "The design or improvement of the proposed subdivision is not consistent with applicable general and specific plans" — single shared driveway/fire lane configuration is inconsistent with WSGVAP and PASD policies on access, form, and massing;
- **§ 66474(c):** "The site is not physically suitable for the type of development" — 0.4-acre R-1 parcel is not physically suitable for five detached condominium units below the 5,000 sq. ft. minimum lot area;
- **§ 66474(d):** "The site is not physically suitable for the proposed density of development" — same;
- **§ 66474(e):** "The design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat" — see Section V above;
- **§ 66474(f):** "The design of the subdivision or type of improvements is likely to cause serious public health problems" — inadequate water flow, inadequate fire access, inadequate emergency egress on a single private driveway, asbestos/lead-paint disturbance without disclosed mitigation;
- **§ 66474(g):** "The design of the subdivision or type of improvements will conflict with easements... acquired by the public at large for access through or use of property" — Arcadia Avenue right-of-way capacity for parking and circulation.

Government Code § 66473.5 also requires an affirmative finding of **general plan consistency**, which cannot be made on this record.

VII. PROCEDURAL DEFECTS AND FEDERAL DUE PROCESS CONCERNS

A. Inadequate Notice Under State and Federal Law

The Notice posted at the site is materially incomplete. It does not identify:

1. The full set of entitlements requested (whether a variance, density bonus, small lot modification, or parking modification is sought);
2. The applicant of record and any related entities;
3. The CEQA findings supporting the categorical exemption;
4. Whether County Fire, Public Works, and Building & Safety have issued conditions or comments;
5. The deadline and procedural mechanism for written comment submission prior to the hearing.

Notice must be "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane v. Central Hanover Bank & Trust Co.* (1950) 339 U.S. 306, 314 (federal Fourteenth Amendment due process). California has applied this constitutional minimum to land use actions affecting nearby property owners. *Horn v. County of Ventura* (1979) 24 Cal.3d 605, 612–615 (notice and hearing required for adjacent property

owners affected by discretionary land use approvals); *Scott v. City of Indian Wells* (1972) 6 Cal.3d 541. As an adjacent property owner, I am entitled to notice that meaningfully identifies the action proposed, the entitlements requested, and the CEQA basis claimed.

B. Government Code § 65091

Government Code § 65091 establishes the noticing standard for hearings on residential development projects. The Notice posted at the site does not appear to meet that standard's substantive content requirements.

VIII. THE PLANNING COMMISSION'S PATTERN OF DISREGARDING ACTUAL COMMUNITY IMPACTS, AND THE FAILURE OF DISTRICT REPRESENTATION

This comment would be incomplete without naming a recurring pattern that this Commission and the Office of the Fifth District Supervisor have allowed to take root in the unincorporated communities of the West San Gabriel Valley.

A. The Commission's Standard of Review Has Drifted From the Statute

The Commission's role under the Subdivision Map Act, the County General Plan, and CEQA is not a ministerial rubber stamp. The Commission is charged with making **independent, substantial-evidence findings** on every tentative tract map presented to it (Gov. Code §§ 66473.5, 66474), and is required by CEQA to take a "hard look" at potential environmental impacts before relying on any categorical exemption. *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68. In practice, the residents of unincorporated North San Gabriel and the surrounding West San Gabriel Valley unincorporated islands — South San Gabriel, East Pasadena-East San Gabriel, San Pasqual, South Monrovia Islands, Whittier Narrows, and South El Monte Island — have watched project after project move through this Commission with categorical exemptions, undisclosed variances, and post-hoc findings that were never tested against the lived reality of the affected streets.

The "actual community impacts" of projects like PRJ2021-002634 are not abstractions. They are the concrete, daily, physical conditions that the residents of Arcadia Avenue and surrounding blocks contend with: aging water mains that lose pressure when multiple homes draw simultaneously; a single-transformer secondary distribution that browns out during summer peak; saturated on-street parking that already produces routine sight-line conflicts and near-misses at driveway aprons; emergency response times that have lengthened year over year as call volume in unincorporated patrol beats has outpaced staffing; absent sidewalk, drainage, and tree-canopy maintenance; and a cumulative pattern of small-lot infill subdivisions that, taken together, are the same projects the County's own WSGVAP Draft PEIR concedes produce significant and unavoidable cumulative impacts. When the staff report on a project of this kind contains a Class 32

box checked and nothing more, **the Commission is not seeing the community.** It is seeing a paper file that has been engineered to avoid disclosure.

B. Failure of Fifth District Representation in the Unincorporated North San Gabriel Area

The unincorporated portion of North San Gabriel sits within the Fifth Supervisorial District, currently represented by Supervisor Kathryn Barger. The residents of this unincorporated island do not have a city council. They do not have a city planning department, a city public works department, or a city manager whose job is to walk these streets. **The County Supervisor is, functionally, our only elected representative on local land use, infrastructure, and public-service questions.** That structural reality places a heightened obligation on the Office of the Fifth District to show up, to respond to constituent correspondence, and to hold the Department of Regional Planning and the unincorporated-service departments accountable.

That obligation has not been met. The unincorporated North San Gabriel area has been allowed to deteriorate visibly over the past decade. Public right-of-way maintenance is inconsistent. Code enforcement on absent landlords and chronically substandard properties is sporadic. Street trees go unreplaced. Pavement and curb conditions on residential collectors, including Arcadia Avenue, have degraded materially. Sheriff's patrol coverage out of Temple Station is stretched thin across a large unincorporated geography. And projects like PRJ2021-002634 — which would convert a single-family parcel into five condominium units below the R-1 minimum lot area, on a street that cannot absorb the additional water, power, traffic, parking, and emergency-response demand — are advanced to public hearing without the Office of the Fifth District ever publicly identifying the obvious infrastructure deficit, requesting a Will-Serve letter, requesting a fire-flow analysis, or asking how this project will be reconciled with the cumulative impact findings in the County's own area plan.

Constituent voices in this unincorporated island have been raised in correspondence, in community meetings, and in prior Commission comments on similar projects. They have not produced a meaningful response from the Office of the Fifth District. The residents of unincorporated North San Gabriel are not opposed to housing. They are opposed to the quiet practice of approving multi-unit infill projects on infrastructure that was sized for single-family use, while their elected representative declines to make the issues visible.

For purposes of this hearing, this Section is part of the administrative record. It is offered not as personal grievance, but as substantial evidence relevant to the § 15300.2(b) cumulative-impact analysis, to the Subdivision Map Act § 66474 mandatory denial findings, and to the public's reasonable expectation under the Fourteenth Amendment that a discretionary approval affecting their daily lives will be considered with actual attention to the conditions on the ground. *Mullane v. Central Hanover Bank & Trust*

Co. (1950) 339 U.S. 306; *Horn v. County of Ventura* (1979) 24 Cal.3d 605.

The Commission has the authority, on this record, to break that pattern. I respectfully ask that it do so.

IX. RELIEF REQUESTED

For the foregoing reasons, I respectfully request that the Los Angeles County Regional Planning Commission take the following actions on June 3, 2026:

1. **Deny** Project No. PRJ2021-002634 by making one or more of the mandatory denial findings under Government Code § 66474, supported by the substantial evidence in this comment;
2. In the alternative, **continue** the matter and direct staff to:
 - a. **Vacate** the Class 32 categorical exemption determination;
 - b. **Prepare an Initial Study** consistent with CEQA Guidelines § 15063 evaluating, at a minimum: water supply (consistent with *Vineyard*); electrical service capacity; transportation and VMT (consistent with Guidelines § 15064.3 and *Mejia*); on-street parking displacement and resulting circulation impacts; fire access, fire flow, and emergency response (consistent with Appendix G §§ IX, XV, XX, and *Bonta v. County of Lake*); law enforcement service ratios; air quality, asbestos, and lead; hazardous materials; historical resources; hydrology and water quality; biological resources; and cumulative impacts;
 - c. **Disclose** in the public record any and all variances, density bonuses, small-lot modifications, parking exceptions, and PASD compliance determinations on which approval would depend;
 - d. **Obtain and publish** the County Fire Department's apparatus access analysis, written fire flow determination, and hydrant verification;
 - e. **Obtain and publish** Will-Serve letters from the applicable water purveyor and Southern California Edison;
 - f. **Re-notice** the hearing with a Notice that complies with Government Code § 65091, *Horn v. County of Ventura* (1979) 24 Cal.3d 605, and *Mullane v. Central Hanover Bank & Trust Co.* (1950) 339 U.S. 306, and that accurately identifies the CEQA basis and entitlements requested;
3. **Preserve** all communications, e-mails, and internal staff notes concerning this

project for the administrative record under Public Resources Code § 21167.6.

I expressly reserve all rights, including the right to petition for a writ of mandate under Public Resources Code §§ 21168 and 21168.5 and Code of Civil Procedure § 1094.5 should the Commission approve this project on the present record.

I respectfully request written confirmation that this comment has been received, made part of the administrative record, and transmitted to the Commissioners in advance of the June 3, 2026 hearing.

I intend to appear and testify at the hearing in person and reserve the right to submit additional comments and supporting exhibits up to and including the date of the hearing.

Thank you for your consideration.

Respectfully submitted,

Michael Karl McNeil, M.S., REP, RIHP, REPP/NREP, EMT-II 9163 Arcadia Avenue San Gabriel (Unincorporated North San Gabriel), California 91775 (626) 546-9384 | mike@mcneilsafetyconsulting.com

TABLE OF AUTHORITIES

California Statutes

- Cal. Pub. Res. Code §§ 21000 *et seq.* (CEQA)
- Cal. Pub. Res. Code § 21080.1 (CEQA findings)
- Cal. Pub. Res. Code § 21084.1 (Historical Resources)
- Cal. Pub. Res. Code § 21151.9 (Water Supply Assessments)
- Cal. Pub. Res. Code § 21159.25 (Statutory exemption for unincorporated infill)
- Cal. Pub. Res. Code §§ 21167.6, 21168, 21168.5 (administrative record; writ review)
- Cal. Gov. Code § 65091 (Notice of hearing)
- Cal. Gov. Code § 65302 (General Plan elements)
- Cal. Gov. Code § 65915 (Density Bonus Law)
- Cal. Gov. Code § 66473.5 (Subdivision Map Act — General Plan consistency)
- Cal. Gov. Code § 66474(a)–(g) (Subdivision Map Act — Mandatory denial findings)
- Cal. Water Code §§ 10910–10912 (Water Supply Assessments)
- Cal. Code Civ. Proc. § 1094.5 (Administrative mandamus)

California Regulations

- 14 Cal. Code Regs. § 15063 (Initial Study)
- 14 Cal. Code Regs. § 15064 (Determining significance)

- 14 Cal. Code Regs. § 15064.3 (Transportation / VMT)
- 14 Cal. Code Regs. § 15064.5 (Historical Resources)
- 14 Cal. Code Regs. § 15300.2 (Exceptions to categorical exemptions)
- 14 Cal. Code Regs. § 15332 (Class 32 Infill Development)
- 14 Cal. Code Regs. App'x G §§ IX, XV, XVII, XX (Initial Study checklist)
- L.A. County Code Title 22 §§ 22.52.100, 22.52.250, 22.120, 22.174, 22.194, 22.320 et seq. (PASD)

California Case Law

- *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086
- *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204
- *City of Hayward v. Board of Trustees of California State University* (2012) 207 Cal.App.4th 446
- *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98
- *Communities for a Better Environment v. South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310
- *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777
- *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859
- *Friends of Riverside's Hills v. City of Riverside* (2008) 168 Cal.App.4th 743
- *Horn v. County of Ventura* (1979) 24 Cal.3d 605
- *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692
- *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322
- *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68
- *People ex rel. Bonta v. County of Lake* (2024) 105 Cal.App.5th 1222
- *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903
- *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818
- *Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal.App.4th 694
- *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116
- *Scott v. City of Indian Wells* (1972) 6 Cal.3d 541
- *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182
- *Taxpayers for Accountable School Bond Spending v. San Diego Unified School District* (2013) 215 Cal.App.4th 1013
- *Valley Advocates v. City of Fresno* (2008) 160 Cal.App.4th 1039
- *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412

Federal Authority

- U.S. Const. amend. XIV (Due Process)

- *Mullane v. Central Hanover Bank & Trust Co.* (1950) 339 U.S. 306
- 40 C.F.R. Part 61, Subpart M (NESHAP — Asbestos)
- 40 C.F.R. Part 745 (HUD/EPA Lead Renovation, Repair and Painting Rule)

Regulatory Standards

- California Fire Code Chapter 5; § 503 (fire apparatus access); § 504 (egress); Appendix B (fire flow)
- South Coast Air Quality Management District Rule 403 (fugitive dust)
- South Coast Air Quality Management District Rule 1403 (asbestos demolition)
- Los Angeles County MS4 NPDES Permit, LARWQCB Order R4-2021-0105
- ASTM E1527-21 (Phase I Environmental Site Assessment standard)
- NFPA 1710 / NFPA 1720 (emergency response time benchmarks)
- ITE Trip Generation Manual (most recent edition)

Enclosures (to be supplemented prior to hearing):

- Photographs of project site and surrounding context
- Site map showing 9163 Arcadia Avenue and 9072 E. Arcadia Avenue (subject parcel)
- Excerpts: Title 22 §§ 22.52.100, 22.52.250 (R-1 minimum lot area)
- Excerpts: 14 Cal. Code Regs. §§ 15300.2, 15332
- Excerpts: WSGVAP Draft PEIR significant and unavoidable impact findings

Michael McNeil, MS, RIH, REP

www.mcneilsafetyconsulting.com

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From: Michael McNeil <mike@mcneilsafetyconsulting.com>
Sent: Monday, May 18, 2026 5:03 PM
To: DRP PRA
Cc: Joshua Huntington; Michelle Lynch
Subject: Re: (PRA 26-438) WRITTEN OPPOSITION AND OBJECTION TO PROJECT NO. PRJ2021-002634 Tentative Tract Map — 9072 E. Arcadia Avenue Unincorporated North San Gabriel, Los Angeles County, CA 91775

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Lynch and Honorable Commissioners:

This message supplements my written opposition dated May 8, 2026, concerning Project No. PRJ2021-002634 / Tentative Tract Map No. 83480 — the proposed five-unit detached condominium subdivision at 9072 E. Arcadia Avenue in unincorporated North San Gabriel, set for public hearing on June 3, 2026. I am the owner-occupant of 9163 Arcadia Avenue, directly across from the project site. I respectfully request that this supplement be added to the administrative record for the project and transmitted to the Commissioners in advance of the hearing.

A material development has occurred since my May 8 letter. On Tuesday, May 12, 2026, the Board of Supervisors voted 5-0 to approve an amended version of the County's Housing Ordinance Update. By its own terms, that ordinance amends both Title 21 (Subdivisions) and Title 22 (Planning and Zoning) of the County Code, and it applies specifically to the unincorporated areas of Los Angeles County — including North San Gabriel. County Counsel is now preparing the final ordinance for a concluding adoption vote at an upcoming Board meeting.

Two aspects of the Board's action bear directly on TR83480 and on the Commission's June 3 decision.

First, the County's subdivision framework is in active transition. The Housing Ordinance Update revises Title 21 — the very Title under which this tentative tract map would be approved — and adds new conditions governing the approval of tentative maps in the unincorporated areas. It would be neither prudent nor consistent with orderly administration for the Commission to approve a five-year-old tentative map under a 2021-era staff categorical exemption during the narrow window before the County's updated subdivision and zoning rules are finally adopted. The appropriate course is to continue the matter.

Second, the Board has now formally recognized the very impacts this community is raising. In advancing the ordinance, Supervisor Kathryn Barger — the Fifth District Supervisor for this unincorporated area — authored and secured an amendment directed squarely at the strain that density-incentivized development places on established neighborhoods. Her

stated rationale identified community frustration with oversized development and "growing parking challenges in neighborhoods that already have limited street parking," and the need to balance new housing against the quality of life of existing residents. That is precisely the conflict TR83480 presents: five detached condominium units, including one designated affordable unit, on a single approximately 0.61-acre parcel, served by one shared private driveway and fire lane, on an Arcadia Avenue block that already experiences saturated on-street parking.

The staff categorical exemption now before the Commission analyzed none of the parking, access, fire, water, sewer, or cumulative impacts that the Board — one week ago — found significant enough to legislate. My May 8 letter documents those impacts, together with the facial defects in the categorical exemption and the unresolved infrastructure record, including the County Department of Public Health's June 17, 2025 determination that it does not recommend clearance of this project pending current water and sewer "will-serve" letters.

Accordingly, I renew the relief requested in my May 8 letter and respectfully request that the Commission:

1. Continue Project No. PRJ2021-002634 so that this tentative map is not approved in the narrow interval before the County's updated Title 21 and Title 22 housing framework is finally adopted;
2. Decline to rely on the staff categorical exemption and direct preparation of an Initial Study that evaluates the parking, access, water, sewer, fire, and cumulative impacts identified in my May 8 submission, consistent with the County's current housing and neighborhood-compatibility policy direction; and
3. Provide written confirmation that this supplement has been received, made part of the administrative record, and transmitted to the Commissioners before the June 3, 2026 hearing.

I intend to appear and testify at the hearing in person, and I reserve the right to submit further comment and supporting exhibits up to and including the hearing date.

Thank you for your consideration.

Respectfully submitted,

Michael McNeil, MS, RIH, REP

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