



PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

STAFF REPORT

DATE: JANUARY 24, 2023

TO: DESIGN COMMISSION

FROM: JENNIFER PAIGE, AICP, ACTING DIRECTOR OF PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

SUBJECT: APPLICATION FOR CONCEPT DESIGN REVIEW
DEMOLITION OF THREE NON-HISTORIC COMMERCIAL BUILDINGS,
REMOVAL OF TWO PROTECTED TREES, AND CONSTRUCTION OF A NEW,
APPROXIMATELY 46,300 SQUARE-FOOT, FOUR-STORY, 83-UNIT SINGLE-
ROOM OCCUPANCY (SRO) BUILDING WITH ONE CARETAKER'S UNIT AND
SURFACE PARKING
1501-1525 EAST WALNUT STREET

RECOMMENDATION:

It is recommended that the Design Commission:

Environmental Determination

1. Find that the proposed project is consistent with the General Plan designation, with the General Plan goals and policies for the site, and with the applicable zoning designation and regulations; and that the project site has no value as habitat for endangered or threatened species, and can be served by utilities and public services;
2. Find that approval of the project will not result in any significant effects relating to traffic, noise, air quality, water quality or cultural resources; and
3. Conclude, therefore, that the project is categorically exempt from the California Environmental Quality Act under §15332, (Class 32) "in-fill development projects" and that there are no features that distinguish this project from others in the exempt class and, therefore, there are no unusual circumstances.

Findings for Compliance with the Tree Protection Ordinance

1. Acknowledged that a tree inventory and arborist report identify the removal of two (2) protected mature trees;

2. Find that the removal of two (2) protected mature trees (*Ailanthus altissima*/Tree of Heaven) meets Finding #6 of the Tree Protection Ordinance: “The project as defined in Section 17.80.020, includes a landscape design plan that emphasizes a tree canopy that is sustainable over the longer term by adhering to the Replacement Matrix prepared by the City Manager and included in the associated Administrative Guidelines;”
3. Acknowledge that the proposed landscape plan indicates a total of 12 new tree plantings at 24” box size, and a total of four new tree plantings at 36” box size, where, pursuant to the Tree Replacement Matrix for Mature Trees, only eight replacement trees at 24” box size or four replacement trees at 36” box size are required; and, therefore,
4. Approve the removal of two (2) protected mature trees (*Ailanthus altissima*/Tree of Heaven).

Findings for Concept Design Approval

Find that the project, upon implementation of the conditions of approval, will comply with the purposes of design review, the design-related goals and policies of the Land Use Element of the General Plan and the Guidelines for Neighborhood Commercial and Multi-Family Residential Districts; and based on these findings, approve the application for Concept Design Review subject to the conditions of approval in Attachment A, which shall be further reviewed by the Design Commission during Final Design Review.

BACKGROUND:

Project Overview

- General Plan Designation: Low Commercial
- Zoning: General Commercial (CG)
- Design Guidelines: The applicable design guidelines are the design-related goals and policies in the Land Use Element of the General Plan and the Design Guidelines for Neighborhood Commercial and Multi-Family Residential Districts.
- Site: The site is located on the north side of East Walnut Street, approximately mid-block between North Hill Avenue and North Sierra Bonita Avenue, two blocks south of the 210 freeway. The project site consists of four adjoining parcels. The far northern areas were once part of the former Atchison, Topeka and Santa Fe Railroad right-of-way and currently sit mostly vacant. The three, street-abutting parcels are currently developed with a combination of auto-oriented businesses, a vacant building, and surface paving. The primary structures were constructed in 1947, 1967, and 1973. A cellular tower is located on the far eastern lot. All buildings and associated site improvements - including the cellular tower, but with the exception of existing power poles in the rear yard, are proposed to be demolished for the construction of the new project. The existing buildings underwent a Historic Resource Evaluation (HRE) and on November 23, 2022, were determined to be ineligible as historical resources.

- Surroundings: The project site sits within a neighborhood block consisting primarily of auto-oriented businesses with some commercial and office uses interspersed throughout. The development context of the neighborhood block is reflective of these land uses, with mostly single-story industrial architectural styling and differing building ages. Located immediately to the west of the project site is a single-story auto repair business, and to the immediate east of the project site is a single-story commercial structure. Directly across the street, to the south of the subject site, are additional single-story commercial and auto-oriented businesses. Directly to the north of the project site are single-story single-family and low-density multi-family residential developments. There are no known designated or non-designated historical resources within the immediate vicinity. This particular part of East Walnut Street is zoned as Commercial General (CG) on both sides, with a multi-family residential zoning district (RM-16) abutting the subject site to the immediate north. Single-room-occupancy housing is allowed in the CG zone as a by-right use.
- Project Description: The project involves the proposed demolition of three non-historic non-residential buildings and the construction of a new Single-Room-Occupancy residential development with a total of 84 units including one caretaker's unit. The proposed project will have a maximum height of 45 feet encompassed within four floors and will comprise a total of 46,305 square feet. A total of 48 at-grade parking spaces are proposed, with a majority of them located in a surface lot behind the building. The project proposes to incorporate affordable housing and make use of density bonus, with 67 units proposed at market rate, and 16 as affordable (4 at Very Low Income, 4 at Low Income, and 8 at Medium Income).
- Trees: A total of 11 private trees are located on site, and 10 are proposed to be removed, two of which are protected under the City's Tree Protection Ordinance. The two trees proposed for removal are defined as mature trees with a DBH of over 19 inches. The two mature trees are identified as Tree #9 (Ailanthus altissima / Tree of Heaven, DBH 24") and as Tree #10 (Ailanthus altissima / Tree of Heaven, DBH 21"). One protected native Coast Live Oak (Tree #1) is proposed to be protected in place.
- Site Design: The proposed new building will be rectangular in design, and will be located along the north street edge of East Walnut Street with a surface parking lot and landscaping zones located behind the building. The ground floor of the building will provide two opposing passthrough one-way drives that will lead to the landscaped rear surface parking lot. Site amenities include a dog park located at the far northwest corner, and at the middle of the north building façade is a proposed swimming pool. Setbacks for the building will be five feet at the front, 5'-9" at the east and west side elevations, and 75'-4" at the rear.
- Architectural Style: Contemporary with references of New Formalism
- Developer: 1501 Walnut, LLC
- Architects: Tyler + Kelly Architects
- Landscape Architect: O'Spring Studio

ANALYSIS:

Design Commission Comments from Preliminary Consultation

On January 11, 2022, the Design Commission reviewed an application for Preliminary Consultation for this project. The Commission’s comments from that meeting, with excerpts from the design team’s responses, and staff’s comments, are detailed in the chart below. The design team’s full response are incorporated into the set of plans in Attachment D.

Preliminary Consultation Comment 1
Further develop the simplicity of the project’s form and massing and provide a clear design rationale to support the project’s simplicity.
Applicant Response
“The project is an assemblage of small SRO units, suspended above ground floor common uses. The design rationale clearly shows these modular functions using simple rectangular massing, and an exterior structural and fenestration pattern that portrays the interior uses and occupancies.”
Staff Analysis: <i>Comment satisfactorily addressed</i>
The building has been modestly redesigned to provide clarity in the rationale of the programming, architectural style, and overall design. The symmetrical façade planes and simple massing provide an elevated level of elegance and design simplicity.
Preliminary Consultation Comment 2
The proposed design concept should be applied to the entirety of the project including the surface parking, and outdoor amenities. Consider alternatives to surface parking to allow for provision of a sizable outdoor space for the residents to use and enjoy throughout the year and a more accommodating outdoor pool area. Also consider ways to improve the design of linkages and sequence of travel from one amenity space to another such as to the proposed dog run in the far western corner of the property.
Applicant Response
“The economics of the project do not support subterranean parking. However, we did increase the size of the pool area and provided a larger, covered loggia for seating adjacent to the pool.”
Staff Analysis: <i>Comment satisfactorily addressed</i>
Though the project retains the use of the surface parking, the outdoor areas have been redesigned to accommodate abundant landscaped areas, the preservation of a native Coast Live Oak tree, an enlarged outdoor pool area with added amenities, and clear circulation linkages.
Preliminary Consultation Comment 3
Consider utilizing the existing slope and the property’s seven-foot change in grade to the advantage of providing partially subterranean parking and open up the rear yard for more outdoor garden and amenity spaces. Also consider the need for two drive-through garage openings and study reducing to one vehicular entrance and exit.
Applicant Response
“The cost of excavation and concrete podium construction necessary for partially subterranean parking is not financially feasible for this project. We compared one driveway to two driveways but determined that the loop traffic flow enabled by two driveways was more efficient than the out-and-back traffic flow of one driveway. Reducing to one driveway would also increase the extent of blank wall facing the street. We opted to keep two driveways but did change the traffic circulation to one-way per the suggestion of the Transportation Department and correspondingly reduced the width of the drive aprons and driveway paving from 20 ft to 12 ft. Vehicles will enter at the western driveway and exit at the eastern driveway.”
Staff Analysis: <i>Comment satisfactorily addressed</i>
Staff agrees with the applicant’s rationale behind their reasoning to retain the surface parking, and to retain the two pass-through driveways. The two opposing driveways enhance the design symmetry of the building facades, while the redesign, as suggested by the Department of Transportation, to have each pass-through driveway be one direction reduces their overall width at the façade, and thus reduces the breaks in the building wall. The retention of the surface parking lot is a feasible solution to provide the additional affordable residential units that the project proposes.
Preliminary Consultation Comment 4
Consider retaining and/or relocating as many of the existing on-site trees as possible. It is encouraged that the design of the structure, and site planning, revolve around existing natural elements such as protected trees. The tree inventory indicates a potential total of three protected trees that, if removed, will require a planting replacement of 12 trees at 36-inch box, or 24 at 24-inch box.

Applicant Response
"Per the arborist's report, there are only 2 protected trees on site: Tree 1 – a coast live oak will be preserved. Tree 10 is in poor shape and is also destroying an existing wall. The entire site will be graded, so planting new replacement trees is preferable to saving those that are unprotected. 9- 24" box trees are proposed as replacements (8 required)."
Staff Analysis: <i>Comment satisfactorily addressed</i>
The project proposes to retain the existing protected native Coast Live Oak, and remove the remaining 10 on-site trees. Of the 10 trees, two are classified as mature trees that will be subject to the City's Tree Protection Ordinance, and replacement matrix. See further discussion of the proposed protected tree removals below.
Preliminary Consultation Comment 5
Consider design elements that can further enhance the pedestrian experience through appropriately-scaled architectural features such as shading elements, façade softening through landscape, carefully applied expansion joints, an applied wainscoting, or belt course, particularly along the south elevation. Also, look at solutions to alleviate potentially large expanses of blank wall planes at the corner massing along the street edge.
Applicant Response
"Large plantings are proposed to soften the effect of the blank walls on the west and east ends of the street façade. Expansion joints will be carefully studied further along in the design process."
Staff Analysis: <i>Comment satisfactorily addressed</i>
The project has been redesigned to incorporate a planting buffer at the front façade of the building. Additionally, the selected architectural style of the building with references of New Formalism, has been detailed to provide a symmetrical balance of façade fenestrations, wall recesses, inset balconies, and a simple extended cornice that combine to provide an elegant addition to the City's urban fabric. The purity and rhythm of the building does not necessitate additional façade patterning of wainscoting. While the building at the street edge is expansive in size, the rhythm of the façade detailing and fenestrations, provides a human-scaled street wall that does not necessitate additional visual relief from the building massing.
Preliminary Consultation Comment 6
Study the addition of windows at the opposing ends of the interior circulation corridor to increase the articulation along the exterior façade, and allow for access to daylight in the interior spaces.
Applicant Response
"Additional fenestration has been added to the end elevations. Some portions of the end elevations are occupied by exit stairs."
Staff Analysis: <i>Comment satisfactorily addressed</i>
The applicant has added additional residential unit windows at the west and east side elevations. While the center portion of these façade planes do not contain fenestrations, they enclose internal exit stairwells, which typically do not allow for exterior windows. Additionally, the revised design, and the overall composition of the façade patterning of windows and wall undulations provides a harmonious design rhythm and a clear architectural idiom.
Preliminary Consultation Comment 7
Consider providing larger balconies for the units, particularly along the south façade, to provide usable outdoor space and improve the reduction in solar heat gains.
Applicant Response
"We have increased the depth of the balconies on the ends of the south and north facades. We removed the shallow balconies at the center of each façade."
Staff Analysis: <i>Comment satisfactorily addressed</i>
The applicant has revised the design to provide larger balcony spaces to allow for an enhanced indoor-outdoor integration of residential living. While the middle units at the south elevation do not have balconies, they are provided with a generous glazing opening that approximates the size of the other units containing now larger balconies. As such, the overall architectural idiom remains strong through its form, massing, and fenestrations, while allowing for an equitable access to light and air for the units.
Preliminary Consultation Comment 8
As the landscape design is developed, consider the use of alternative pavement materials that are permeable, and that reduce solar heat gains as further sustainability enhancements to the project.
Applicant Response
"Permeable paving is proposed at the north side of the parking lot. Some decomposed granite is proposed at the dog park."
Staff Analysis: <i>Comment satisfactorily addressed</i>
The applicant has proposed a variety of hardscaping surfaces including natural concrete, colored concrete, pavers, and permeable pavers at the at-grade surface parking lot.

Preliminary Consultation Comment 9
The building is largely mirrored on front and back and east and west. Consider applying the same design consideration to the rear façade as was applied to the front, particularly at the ground level. Look at accentuating the amenity spaces, and making them have a logical presence with clear connectivity to the outdoors. Also, consider providing a clear sight line through the main lobby, from the street, to the rear yard amenity space.
Applicant Response
"We repeated the design of the south façade on the north façade. We linked the amenity spaces to the pool with an axial relationship and generous covered loggia for outdoor seating. There is a clear sight line from the street through the main lobby and lounge to the rear yard amenity spaces."
Staff Analysis: <i>Comment satisfactorily addressed</i>
The applicant has revised the project to have mirrored elevations that provide accentuated architectural symmetry. Additionally, the ground-floor amenity spaces have been visually enhanced and unified through recessed fenestrations that coincide with the overall fenestration patterns of the building façade planes. Also revised was the internal layout of programming, providing a clear sight line from the street through the main lobby to the rear yard.
Preliminary Consultation Comment 10
As the design progresses and the material palette is further developed, consider the use of smooth cement plaster to provide a purity of form at the corner massings and make apparent the intention of their design. Regardless, carefully consider the expansion joints of the stucco or plaster finish and how that relates to the overall building design and how it affects the pedestrian interaction at ground-level.
Applicant Response
"Noted."
Staff Analysis: <i>Comment to be addressed through recommended condition of approval no. 1.</i>
The material specifications are still pending and will be finalized during the Final Design Review process. However, the applicant has indicated that the building will be predominately clad in stucco. As the design and materials are further developed, staff recommends condition of approval no. 1, where applicable, to provide details of the stucco reglets, and to indicate their patterning in the project elevations to ensure the design is consistent with the overall architectural concept.
Preliminary Consultation Comment 11
Carefully study the detailing and finish of the proposed stucco and how its application will accentuate and strengthen the simplicity of the building form.
Applicant Response
"Noted."
Staff Analysis: <i>Comment to be addressed through recommended condition of approval no. 2</i>
The design of the project has been revised to incorporate additional façade fenestrations, façade undulations, and overall façade rhythmic patterning and provides a clearer architectural idiom with stylistic characteristics of New Formalism. The proposed mono-clad nature of the project is in keeping with the revised architectural design. To ensure the stucco cladding is fully compatible, staff recommends condition of approval no. 2, which shall require for the technical finish of the stucco to be specified, and that the stucco be smooth in texture.

Programming and Circulation

The project proposes a double-loaded corridor design layout for the SRO units, which will occupy the second through fourth floors of the new building. The ground floor is proposed to contain the amenity and utility spaces including a double-height front lobby, a gym, a lounge, a community kitchen and dining area that opens onto a recessed covered patio before opening onto the outdoor pool deck. One residential unit will be located at the ground floor, to be reserved as the caretaker's unit. The second level will contain 27 residential units, while the mirrored layouts of the third and fourth floors will contain 28 residential units. The second level contains one less residential unit to accommodate the double-height ground-floor lobby space. Flanking either end of the double-loaded corridor are utility rooms and escape stairs.

Outdoor programming includes a pool deck located at the immediate rear of the building containing a swimming pool, spa, and outdoor kitchen counter. At the far northwest corner of the property, beyond the surface parking lot, is a landscaped dog park area.

As recommended during the Preliminary Consultation, the circulation systems of the project have been clarified with a ground floor lobby that provides a clear visual line of sight from the street to the outdoor rear yard spaces. The double-loaded corridor design of the rectangular building provides a rational efficiency to the layout of the units and circulation paths. Hardscape circulation also encircles the building to provide access to all sides, with clear, unobstructed paths of travel to building entrances, and outdoor programming spaces including the dog park and surface parking lot. Staff finds the project to have a logical patterning and layout of indoor and outdoor programming and circulation systems that are consistent with the applicable design guidelines.

Orientation

The new building will front the northern edge of East Walnut Street, and provide an urbanized street wall to the transitional urban context of this street corridor. The design of the building allows for a symmetrical design on opposing sides, with residential units flanking a centralized internal circulation corridor. All units will have access to northern light or southern light through an expansive glazing system that fronts each unit space at their respective façade planes. The building is rectangular in design with its narrow widths located along its east and west elevations. The orientation of the building allows for maximum solar exposure for the south-facing units, while allowing for maximum northern light and views of the San Gabriel Mountains for the north-facing units. Additionally, the siting of the building along the northern edge of East Walnut Street, allows for maximum distance between the new four-story building and the lower-density residential neighborhood that abuts the northern edge of the property site. Staff finds that the orientation of the building and site layout are efficient, will maintain a sufficient distance between abutting lower-density residential properties, and will promote a new urban context for the transitioning urban corridor.

Height, Massing and Modulation

The height limit for this zoning district is 45 feet, with building elevations indicating a maximum height of 44'-10". The building is rectangular in form, with recessed fenestration openings and stepped reliefs in the façade to provide texture, shadow lines, and visual relief from any potential expansive wall plane. Overall, the design of the building with references to New Formalism architectural styling, provides an understated, yet elegant design through its simplistic form, mono-clad finish, symmetrical facades, and rhythmic patterning of fenestrations and stepped reliefs in the wall planes.

Architectural Style and Detailing

The proposed new building is contemporary with references to New Formalism. The flat-roofed building is proposed to be predominantly clad in stucco with articulated wall planes through the use of recessed fenestrations, inset balconies, and stepped reliefs in the façade walls. The rectangular building equally distributes emphasis on horizontality and verticality through the use of vertical spandrels separating each unit, and the use of datum lines between each floor plate. The rhythmic pattern of fenestrations, balconies, and vertical spandrels provides a human-

scaled break down of the building walls on what would otherwise be expansive wall planes. The patterned rhythm of façade openings and wall reliefs provides textural shadow lines and an elegant approach to façade patterning and modulations. As such, the building is designed in a manner that supports a new urban form for the transitioning urban context of the street, while incorporating residential-scaled detailing through its rhythmic patterning, detailing, and façade symmetry. To ensure the elegance of the proposed design is carried through in construction, staff recommends condition of approval no. 1 to provide details of the stucco reglets, where applicable, and to indicate their patterning on the building elevations to ensure they are compatible with the simplicity of the building design, and condition no. 2 which requires a provision of the technical specification of the stucco finish, which shall be smooth to reflect the purity of the proposed building form.

Compatibility

The proposed new building is located along a commercial corridor that is currently undergoing a transition to a higher density, urban residential and mixed-use neighborhood with active infill development projects located within the immediate vicinity. The building will establish a new urbanized paradigm along the commercial street with a consistent street wall, allowable building height, and new residential units. The building will be composed of an architectural idiom that is contextually urban in its simplicity of form, and massing. Additionally, the applicant has sited the building to the south end of the project site to set a precedent by establishing a new urbanized street wall, and to maximize the distance between the new four-story building and the lower density residential neighborhood to the immediate north of the project site. As such, staff finds the project to be compatibility designed for a context that is in transition, while establishing a positive urban precedent.

Conceptual Landscape Design

The provided landscape plans indicate a diverse planting palette of California-friendly perennials. Additionally, the landscape plans call for a total of 12 new 24-inch box trees and four 36-inch box trees for the rear yard, along with four new street trees per Public Works requirements. Hardscape plans indicate the use of colored concrete and paver blocks at select amenity areas, and permeable pavers in the surface parking lot area. A planting border will be provided at the building's south, east and west elevations to create a landscaped buffer of these visually-prominent façade planes. Staff finds the conceptual landscape plans to provide a compatible landscaping and hardscaping design, with a generous allotment of planting areas and new on-site shade trees. Further landscape details and specifications will be required as part of the Final Design Review submittal.

Protected Tree Removal

An arborist report and accompanying tree inventory notes that there are 11 on-site trees and that 10 are proposed to be removed. There are no public street trees along the property's frontage. Tree no. 1, a native Coast Live Oak located near the northwest corner of the lot is proposed to be protected in place. Two of the 10 trees proposed to be removed are defined as mature trees and are subject to the City's Tree Protection Ordinance. The protected trees are both identified as Tree of Heaven (*Ailanthus altissima*), and tagged as Tree no. 9 with a DBH of 24 inches, and Tree no. 10 with a DBH of 21 inches. According to the applicant's arborist, Tree no. 9 is located immediately adjacent to a building proposed for demolition as part of the project,

and will sustain serious injury during the demolition process. Tree no. 10 has been identified as being in poor condition and is also located in a demolition zone, which will also result in serious injury to the tree.

As such, the removal of both mature trees can be approved under Finding #6 of the tree Protection Ordinance, which states, "The project, as defined in Section 17.80.020, includes a landscape design plan that emphasizes a tree canopy that is sustainable over the long term by adhering to the replacement matrix prepared by the City Manager and included in the associated administrative guidelines."

Pursuant to the replacement matrix, the removal of mature trees no. 9 and 10 shall require for a total of eight on-site replacement trees at 24-inch box size, or a total of four on-site replacement trees at 36-inch box size, of any species. The provided landscape plans indicate a total of 12 on-site new tree plantings at 24-inch box size, and an additional four new trees at 36-inch box. The aggregate sum of new on-site tree plantings is 16 trees, in excess of the minimum replacement requirements listed above. Staff finds that the proposed landscape plan provides an adequate tree replacement selection in specification of species, sizes, and locations to ensure the long term health of the new trees, and to mitigate any long-term impact to the City's urban forest and recommends approval of the two mature trees.

As noted above, the applicant proposes to preserve one protected tree, Tree no. 1, a native Coast Live Oak located near the northwest corner of the lot. As such, staff recommends condition no. 3 to require submittal of a Tree Protection Plan for review during Final Design Review.

COMMENTS FROM OTHER DEPARTMENTS:

Staff routed the project to several City departments, including the Public Works, Transportation, and Housing Departments. Additionally, the project was routed to the Current Planning and Cultural Affairs Divisions of the Planning & Community Development Department. The project was found to be consistent with the provisions of the Zoning Code and regulations, while Cultural Affairs noted that the project will not be subject to any public art requirements. Public Works will require several development contingencies such as new street tree planting, and the City's Housing Department will require for an Inclusionary Housing Plan. Recommended conditions from all reviewing City Departments are included in Attachment A.

ENVIRONMENTAL ANALYSIS:

Staff engaged Michael Baker International, an environmental consulting firm, to evaluate the potential environmental impacts of the project and determine whether it would meet the required findings for a Categorical Exemption under Class 32, "Infill Development Projects." Based on the documentation prepared, which is included in Attachment G, the project will be constructed on a previously developed site in an urbanized area, is consistent with the General Plan and Zoning designations, and would not have the potential to result in significant impacts related to air quality, traffic, noise, water quality or cultural resources and, based on this analysis, staff recommends that the Commission determine that the project is Categorically Exempt from CEQA.

CONCLUSION:

The project design has satisfactorily addressed the comments provided during Preliminary Consultation and is consistent with the applicable design guidelines. Staff recommends approval of the application for Concept Design Review for the project with the conditions of approval described above and included in Attachment A, which will be reviewed during Final Design Review.

Respectfully Submitted,



Jennifer Paige, AICP
Acting Director of Planning and
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Prepared by:



Edwar Sissi
Planner

Reviewed by:



Kevin Johnson
Principal Planner

Attachments:

- A. Recommended Conditions of Approval
- B. Architectural Plans, Elevations, and Renderings
- C. Site and Contextual Photos
- D. Applicant Response to Preliminary Consultation Comments
- E. Arborist Report and Tree Inventory
- F. Private Tree Removal Application
- G. Environmental Documentation (Air Quality and Noise Studies, Historic Resource Evaluation determination letter, Transportation Impact Analysis CEQA Evaluation)
- H. Tree Protection Guidelines