



Los Angeles Citywide Housing Element 2021-2029 Update

Initial Study

prepared by

Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012

prepared with the assistance of

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012

January 2021



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Environmental Scientists | Planners | Engineers

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Initial Study

The proposed project involves an update to the Housing Element of the City of Los Angeles General Plan. The proposed Housing Element Update establishes programs, policies and actions to further the goal of meeting the existing and projected housing needs of all family income levels of the community, provides evidence of the City’s ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, as established by the Southern California Association of Governments (SCAG), and identifies any rezoning program needed to reach the required housing capacity. The proposed project also includes necessary updates to the Safety Element triggered under State law by an update to the Housing Element.

This project description focuses on the key policies and programs in the Housing Element that have the potential to result in physical environmental impacts and describes the required updates to the Safety Element.

Case Numbers: CPC-2020-1365-GPA
 ENV-2020-6762-EIR

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3. Project Location

The Los Angeles Citywide Housing Element 2021-2029 Update, Safety Element Update, and Rezoning Program (hereafter referred to as “Housing Element Update” or “proposed project”) would apply to the entire geographic area located within the boundaries of the City of Los Angeles (City), which encompasses 467 square miles. Figure 1 shows the boundaries of the City within the southern California region.

Figure 1 Regional Location

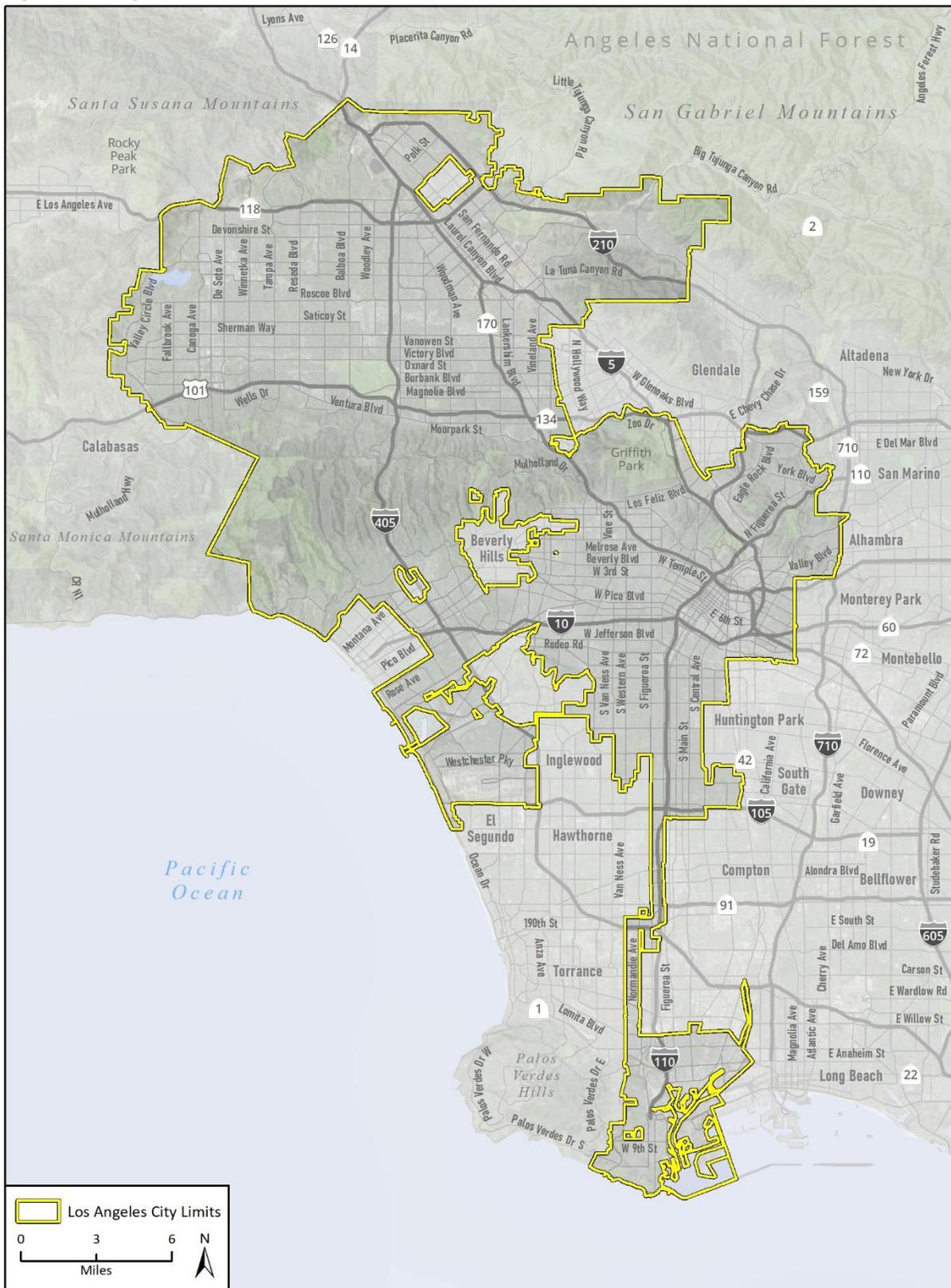


Fig 1 Regional Location

4. Background

Housing Element Law

The Housing Element is one of the eight State-mandated elements of the General Plan. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing strategy, and provides an array of programs to create sustainable, mixed-income neighborhoods across the City.

The City's current Housing Element was adopted on December 3, 2013. The element set forth an action plan covering the planning period from 2013 to 2021. The Housing Element identifies the City's housing conditions and needs; reiterates goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides the array of programs the City has committed to implement to create sustainable, mixed-income neighborhoods across the City.

The Housing Element Law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community through the preparation of a Housing Element. The law requires local governments to adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. The law requires the update of the Housing Element every eight years to reflect the most recent trends in demographics and employment. Pursuant to these requirements, the City of Los Angeles is required to update the Housing Element. The Housing Element Update would establish new policies, goals and programs for the City to accommodate the City's required housing needs allocation as determined by SCAG in the RHNA. The Housing Element Update is required to be adopted by October 15, 2021 and will be in effect through October 2029.

The Housing Element Law also requires that the Department of Housing and Community Development (HCD) review local housing elements for compliance with State law and report written findings to the local government. The City expects to submit the draft Housing Element to HCD in the summer of 2021. Following release of the draft Housing Element, HCD will provide comments to the City, which will be incorporated in a revised Housing Element that will be submitted to HCD by no later than October 15, 2021.

This study analyzes the programs and policies contained in the draft Housing Element that have the potential to result in physical environmental effects, the Inventory of Sites and Rezoning Program needed to demonstrate zoned capacity needed to accommodate the City's RHNA allocation, in addition to the construction and operation of between 419,261 and 429,261 housing units, which is intended to provide a conservative analysis of the "worst-case" scenario of environmental impacts from future implementation of the 2021-2029 Housing Element (see *Proposed Project* section of this introduction).

Since the adoption of the 2013-2021 Housing Element, the California State Legislature adopted several key bills that imposed additional requirements on the Housing Element Update. These recent changes are summarized as follows.

Affirmatively Furthering Fair Housing (AB 686)

Pursuant to Assembly Bill (AB) 686 (2018), the Housing Element must include an analysis and determination of consistency with Affirmatively Furthering Fair Housing (AFFH) requirements. AFFH means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These actions must, when taken together, address significant disparities in housing needs and in access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws.

To comply with these requirements, the implementation programs of the Housing Element must affirmatively further fair housing and must include an assessment of fair housing. The City currently has an adopted Assessment of Fair Housing (AFH) plan (adopted in 2017) and anticipates an update to the AFH to be adopted in 2022. Additionally, the Inventory of Sites suitable for housing development must be identified throughout the City in a manner that affirmatively furthers fair housing opportunities.

For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income portion of the RHNA are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing.

To conduct this analysis, the City will utilize the California Tax Credit Allocation Committee (TCAC)/California Department of Housing and Community Development (HCD) Opportunity Maps, which is shown in Figure 2 and can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>.

Additional Requirements Related to the Inventory of Sites (AB 1397 and SB 166)

Since the 5th cycle Housing Element was adopted in 2013, the State Legislature has adopted several bills which strengthened requirements related to the Inventory of Sites. Among these, the most significant are AB 1397 (2017) and SB 166 (2017), which imposed several key new requirements. These new requirements are summarized as follows.

Enhanced Requirements: Realistic Development Potential (AB 1397)

Assembly Bill 1397 requires that, for each site included in the inventory, the City identify the realistic development potential for the site within the eight-year planning period. For non-vacant sites, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives.

Additionally, for jurisdictions such as Los Angeles where non-vacant sites are used to accommodate 50 percent or more of the lower-income RHNA allocation, the non-vacant site's existing use is presumed to impede additional residential development, unless the Housing Element describes findings based on substantial evidence that the use will likely be discontinued during the planning period.

No Net Loss (SB 166)

Senate Bill 166 amended existing No Net Loss Law to require sufficient adequate sites to be available at all times throughout the Housing Element planning period to meet a jurisdiction's remaining unmet RHNA goals for each income category. To comply with the No Net Loss Law, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites according to the No Net Loss Law if a jurisdiction rezones a site or if the jurisdiction approves a project at a different income level or lower density than shown in the sites inventory. Lower density means fewer units than the capacity assumed in the site inventory.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA. Jurisdictions can also create a buffer by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level.

Rezoning for Re-Use of Sites to Accommodate Lower Income RHNA (20 percent inclusionary, By-right)

Sites identified to accommodate the lower-income RHNA are subject to additional requirements if they were identified in a previous planning period. Generally, these requirements would apply to the use of non-vacant site that was identified in the prior planning period's housing element (i.e., 5th cycle Housing Element), or to the use of a vacant site that was identified in two or more consecutive planning periods (i.e., 5th and 4th cycle Housing Elements).

When sites meeting these conditions are used to accommodate the lower-income RHNA, the jurisdiction's Housing Element must include a program to be completed within three years of the beginning of the planning period to allow residential use by right at specified densities (in Los Angeles, the minimum required density is 30 dwelling units per acre [du/acre]) for housing developments in which at least 20 percent of the units are affordable to lower income households. Sites where zoning already permits residential "use by right" as set forth in Government Code Section 65583.2 (i) at the beginning of the planning period would be considered to meet this requirement.

Replacement Requirements

Government Code Section 65583.2(g)(3) now requires that the Housing Element include a program to impose housing replacement requirements on certain sites identified in the Inventory of Sites. These replacement requirements would require the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site consistent with those requirements set forth in State Density Bonus Law (Government Code Section 65915(c)(3).)

The housing replacement requirements would be required for sites identified in the Inventory of Sites that currently have residential uses, or within the past five years¹ have had residential uses that have been vacated or demolished, and:

- Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- Occupied by low or very low-income households.

Required Rezoning to Accommodate Shortfall

If, after completing the Inventory of Sites, the City concludes that there is a shortfall of sites to accommodate the RHNA allocation, then the Housing Element must include a program to identify sites that can be rezoned during the planning period. For any shortfall of sites to accommodate the lower-income RHNA, the Housing Element is required to include an

¹ For the purpose of this program "previous five years" is based on the date the application for development was submitted.

inventory of potential sites for rezoning, and those sites must meet the adequate sites requirements in terms of suitability and availability.

Sites identified to meet the rezoning need for a lower-income shortfall must comply with a set of specific parameters, including the requirement that the site:

- Permit owner-occupied and rental multi-family uses by right for developments in which 20 percent or more of the units are affordable to lower income households.
- Permit the development of at least 16 units per site.
- Permit a minimum of 20 du/ac.²
- Ensure a) at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses, or b) if accommodating more than 50 percent of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.

The requirements to identify an inventory of sites for rezoning within the Housing Element Programs do not apply to rezonings that may be required to accommodate a Moderate Income or Above Moderate Income RHNA shortfall. Following the adoption of the Housing Element, jurisdictions have three years to adopt the rezonings, with some ability for extensions based on specific criteria. For the City of Los Angeles, these rezonings must be completed and adopted by October 2024, but specific sites do not need to be identified in the Housing Element.

Additional Requirements Related to the General Plan – AB 162 (2007), SB 1241 (2012), SB 99 (2019), AB 747 (2019), SB 1035 (2018), SB 379 (2015), and SB 1000 (2016)

Several recent state laws require the City to make updates to other sections of the General Plan alongside the update to the Housing Element. These laws place a particular emphasis on the Safety Element, with an expanded focus on planning for flooding, wildfires, and climate change impacts. More detail on updates to the Safety Element is described in *Description of Safety Element Update*. Additionally, SB 1000 expands requirements surrounding Environmental Justice. Many of these requirements are met through LA’s existing Environmental Justice Element, the Plan for a Healthy LA, but minor amendments may be necessary to ensure full compliance.

RHNA Allocation

The RHNA is mandated by State law as part of the periodic process of updating local housing elements of the General Plan. The RHNA allocation process begins with a regional determination figure (the total number of housing units needed to meet housing needs in the SCAG region) issued by HCD, followed by an allocation to each jurisdiction within the region

² Sites within metropolitan jurisdictions, as defined by Government Code Section 65583.2(c)(3)(B)(iii) and (iv), must permit a minimum of 20 du/acre. In Los Angeles, a minimum density of 20 du/acre is equivalent to the density permitted in the RD2 zone. Sites rezoned to the RD2, RD1.5, R3, R4, R5 and Commercial zones would satisfy this requirement.

(specific number of units allocated to each jurisdiction). In prior Housing Element cycles, the regional determination figure was based solely on projected housing need during an eight-year planning period. Recent changes to State law added a requirement that existing housing need must be incorporated in the regional determination by considering housing need indicators such as vacancy rates, jobs/housing balance, cost burden, and overcrowding.

On October 15, 2019, HCD issued a final regional determination of 1,341,827 units to the SCAG region for the 6th cycle. The total regional allocation accounts for “projected need” within the region (about 506,000 housing units) and “existing need” within the region (about 836,000 housing units). The new existing need component is the primary reason the RHNA allocation is much larger for the 6th cycle than for past cycles, and largely reflects housing production needed to accommodate the needs of the existing population within the SCAG region.

SCAG is responsible for preparing the RHNA allocation methodology, which allocates the overall regional allocation (1.34 million housing units) among all SCAG jurisdictions based on the need for housing within each jurisdiction during specified planning periods, as well as other statutory requirements. The main factors included in the allocation methodology are household growth (based on the Connect SoCal, or SCAG Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS] growth forecast), job accessibility, transit accessibility, and socioeconomic conditions. The current RHNA projection period covers an eight-year period from October 2021 to October 2029.

The RHNA allocation is determined by a number of factors. SCAG estimates the future population within each jurisdiction based upon State Department of Finance projections and knowledge of circumstances particular to the region. The population change is then converted into housing units necessary to accommodate projected population increases. This estimate includes a vacancy rate that reflects a “healthy” housing market, and replacement of existing units that may have been demolished. The estimate of housing needs is then divided into four groups based on income: very-low, low, moderate, and above moderate income based on the income characteristics of the community. Table 1 shows the current draft RHNA allocation³ required for the City of Los Angeles by household income group.

³ Based on September 3, 2020 Draft Allocation. The final allocation is anticipated in February 2021.

Table 1 City of Los Angeles Draft RHNA Allocation

Income Level	Number of Units
Very Low Income*	115,680
Low Income*	68,590
Moderate Income	74,936
Above Moderate Income	196,368
Total RHNA Allocation	455,577

*All Very Low Income and Low Income units must be accommodated on sites with a density of at least 30 du/acre⁴

Under the RHNA allocation, the City is required to provide the zoned capacity to accommodate the development of at least 455,577 residential units using various land use planning strategies. The City provides capacity for housing through local zoning regulations. The City, however, is not required to physically construct 455,577 units as a result of the RHNA allocation.

Targeted Capacity for Inventory of Sites

It is possible that, as a result of the final RHNA adoption and appeals process, the City’s final RHNA allocation is slightly different from the draft allocation.⁵ In addition, as discussed in *Housing Element Law*, state law implicitly requires a sufficient buffer in the Inventory of Sites to accommodate future reductions in the sites identified for affordable housing as they are developed with another use during the eight-year cycle. When this occurs, the City must demonstrate that there are adequate remaining sites to accommodate the affordable units that had previously been identified for that site or face further rezoning requirements.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdictions identify a buffer of between 15-30 percent over the required allocation, particularly for the lower-income allocation, for the purposes of creating the inventory of sites. The City intends to accommodate a 25 percent buffer in excess of the 184,270 unit lower-income RHNA allocation, for a total target capacity of 230,338 units for lower-income households.

⁴ A minimum density of 30 du/acre is equivalent to the density permitted in the R3 zone. Sites located in the R3, R4, R5 and Commercial zones would meet this requirement.

⁵ Based on the State mandate to approve the Housing Element by October 2021, the need for the City to prepare an EIR for the proposed project, and the time it takes to prepare and circulate a Draft EIR and prepare a Final EIR, the City cannot wait to receive the final RHNA allocation numbers to issue the NOP and start the EIR preparation process.

For these reasons, the City's Inventory of Sites will target identifying a capacity of at least 501,642 units, of which at approximately 230,338 will be accommodated on sites with a density of 30 du/acre or greater.⁶ Table 2 below shows the City's targeted capacity by income category.

Table 2 City of Los Angeles Target Housing Capacity by Income Category

Income Level	Number of Units
Very Low Income*	144,600
Low Income*	85,738
Moderate Income	74,936
Above Moderate Income	196,368
Target Capacity	501,642

*All Very Low Income and Low Income units must be accommodated on sites with a density of at least 30 du/acre. The targeted number of units shown in this table includes a 25 percent buffer above the draft RHNA allocation for these income categories.

5. Description of the Housing Element Update

Summary of Housing Element Update

Most components of the Housing Element are incorporated to meet the requirements under State law for compliant housing elements. The proposed project will include an update to the following six components of the Housing Element:

1. **Housing Needs Assessment** - Provides a comprehensive overview of the City's population, household, and housing stock characteristics, and an analysis of these factors in order to identify housing needs of the variety of household types and special needs across the City. New for the 6th cycle and consistent with the AFFH mandate imposed by AB 686, this component will include a detailed analysis of segregation/integration patterns and disparities in access to opportunity.
2. **Constraints on Housing Maintenance, Improvement, and Development** - Identifies and addresses regulations and conditions that constitute constraints to housing production and preservation, including governmental and nongovernmental regulations, infrastructure requirements and market conditions such as land, construction and labor costs as well as restricted financing availability. New for the 6th cycle, this component will also identify and address constraints caused by opposition to housing.

⁶ This 230,338 number is based on the City's draft RHNA allocation for 184,270 lower-income units, plus a 25 percent buffer of 46,068 units.

3. **Inventory of Sites for Housing** - State housing element law requires the City to show that it has adequate land zoned to accommodate the existing and projected need for housing reflected in the 2021-2029 RHNA allocation. The City's Draft RHNA allocation is 455,577 units, more than five times larger than it was in the previous cycle. In addition, as discussed in *Housing Element Law*, recent changes to state law have established more onerous criteria for site selection to demonstrate adequate zoning capacity that can accommodate the RHNA allocation. As a result, the City anticipates a need to identify a program to rezone some parcels as part of the Project in order to meet state requirements. See additional assumptions in *Description of the Housing Element Update* regarding the Inventory of Sites and Rezoning Program.
4. **Opportunities for Conservation in Residential Development** - State housing element law requires cities to identify opportunities for energy conservation in residential development. The City has broadened this analysis to include energy conservation, water conservation, alternative energy sources and sustainable development which supports conservation and reduces demand.
5. **Review of the 2013-2021 Housing Element** - Preparation of the Housing Element Update will include the essential step of evaluating the previous 2013-2021 Housing Element in order to identify progress and evaluate the effectiveness of previous policies and programs.
6. **Housing Goals, Policies, Objectives and Programs** - The objectives, policies and implementation programs under each goal lay out the City's approach to alleviating housing needs. These tools aim to create sustainable mixed-use, mixed-income neighborhoods across the City and to provide opportunities for housing, jobs, transit, and basic amenities for all segments of the population. Some goals, policies, objectives, and/or programs may be revised, removed, or added to better reflect current housing challenges and priorities, add clarity and consistency, as well as to comply with new state requirements, as discussed in *Housing Element Law*. These revisions will largely restate and refine existing goals, objectives, policies and programs but are likely to include an added focus or emphasis on goals, policies, objectives and programs that do the following:
 - a. Accommodate the RHNA through the Sites Inventory and applicable rezoning program.
 - b. Expand access to opportunity. This may include revisions to existing objectives, policies and implementation programs that promote housing development near transit and jobs centers, to also include a priority for housing development (and in particular, affordable housing development) in higher resource areas.⁷
 - c. Prevent displacement and promote housing stability. This will include additional policies and programs to assist tenants facing eviction as well as programs to expand tenant protections and new or revised programs to preserve and replace existing affordable and Rent Stabilization Ordinance (RSO) housing. This will also

⁷ As defined by the TCAC/HCD Opportunity Maps, which can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>.

- include a program to comply with new housing replacement requirements for the Inventory of Sites (Government Code Section 65583.2(g)(3)).
- d. Promote climate and disaster resiliency, sustainability and Environmental Justice.
 - e. Promote homeless prevention and diversion while expanding access to shelter and housing for persons experiencing homelessness.
 - f. Coordinate housing regulation and design to increase access to amenities that support public health and wellbeing.
 - g. Promote the provision of housing that meets the needs of special needs populations in the City, including but not limited to: seniors, seniors with disabilities, people with disabilities, large families (five or more persons), single female-headed households, people living with HIV/AIDS, people experiencing homelessness, and transition-aged youth.
 - h. Result in reduced vehicle trips by promoting a jobs-housing balance.

In addition, the Housing Element will include a summary of historic housing and land use practices in the City, as well as a study of historical land use patterns.

Inventory of Sites

Background

Under Housing Element law, the City must show that it has adequate land zoned to accommodate the entirety of its 2021-2029 RHNA allocation of 455,577 units. Of these units, a total of 184,273 units must accommodate the City's lower-income RHNA, which means they must be identified on multi-family-zoned sites that have a minimum density of 30 du/acre, or in the R3 or a less restrictive zone. In addition, the Inventory of Sites must demonstrate compliance with AB 686 by incorporating an analysis of how the sites are consistent with AFFH goals.

As stated above, the City is anticipating the need to identify some buffer in the Inventory of Sites. The City intends to identify a total capacity of 501,642 units. Of these, the City anticipates identifying 230,338 lower income units on sites that have a minimum density of 30 du/ac.

Recent changes to state Housing Element law have strengthened requirements related to the Inventory of Sites. In particular, AB 1397 (2017) requires that, for each site included in the inventory, the City identify the realistic development potential for the site within the eight-year planning period. For non-vacant sites, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives.

Anticipated Capacity and Realistic Development Potential

There are a number of new factors that make it difficult to estimate the anticipated zoned capacity and realistic development potential that will be identified in the 6th cycle Housing Element. Based on a preliminary review of remaining available sites from the 5th cycle Housing

Element Inventory of Sites, there is existing identified capacity ranging from 285,411 to 461,222 units;⁸ however, due to the new requirements to demonstrate realistic development potential that is likely to occur during the eight-year planning period, it is anticipated that the realistic capacity demonstrated on these sites will be diminished. The City is currently in the process of developing the proposed methodology to identify the anticipated capacity and realistic development potential. In order to meet the state-mandated deadline for adoption of the Housing Element, the City's environmental review will rely on a conservative estimate of the potential outcome of that methodology. The methodology and basis for that estimate are described as follows.

Proposed Methodology for Housing Element Inventory of Sites

To comply with the new State requirements, the City intends to develop an econometric model to identify realistic development potential and demonstrate zoned capacity. The results of this model will be applied to potential sites that are zoned to permit residential development, in order to determine the realistic development potential during the eight-year planning period (2021-2029).

The model would use eight years of past housing development permits to estimate the amount of new housing that was actually produced during that period given planned capacity. The difference between current planned capacity on a site and existing housing on the site would serve as a baseline estimate of capacity for the site. The baseline would then be adjusted based on the estimated empirical relationship between planned additional capacity and actual development. Moreover, the model would accommodate the various additional state requirements by conditioning the empirical estimates on a variety of additional variables reflecting those requirements, such as age of existing building, FAR and existing land use.

Assumptions

It is anticipated that the result of the proposed methodology will yield a realistic development potential that is similar to the total amount of housing development that has historically occurred during an eight-year period in the City. This estimate will be adjusted upwards to account for recent and pending changes to the City's development conditions that reasonably support the argument that additional development may occur. This includes adjustments based on:

- Added planned capacity and development potential as a result of recently-adopted affordable housing streamlining tools, including the City's Transit Oriented Communities (TOC) Program, local affordable housing incentive programs, and state streamlining bills SB 35 and AB 2162 that have expanded utilization of the City's Density Bonus program;
- Added development potential as a result of recent changes to state Accessory Dwelling Unit (ADU) laws;

⁸ Based on remaining capacity from the 5th cycle Inventory of Sites, after removing sites that have had a building permit issued, with and without conversion factors. As of building permit analysis completed on August 27, 2020.

- Added planned capacity as a result of completed updates to Community Plans, Specific Plans and Transit Neighborhood Plans that have been adopted since the 2013 Housing Element; and
- Added planned capacity as a result of pending updates to Community Plans, Specific Plans and Transit Neighborhood Plans that will be adopted prior to the adoption of the 2021-2029 Housing Element.⁹

During an eight-year period from 2012-2019 (inclusive), a total of 113,608 housing units were permitted, of which 9,500 units were affordable to lower-income households.¹⁰ Table 3 shows these units, broken down by income level.

Table 3 City of Los Angeles Permitted Housing Units, 2012-2019

Income Level	Number of Units
Very Low Income	5,577
Low Income	3,923
Moderate Income	720
Above Moderate Income	103,388
Total Permitted Units	113,608

Based on the adjustments previously described, the City conservatively estimates that the proposed methodology will identify a realistic development capacity of approximately 306,750 units for the 6th cycle Housing Element.

In addition, the City's Site Inventory may account for pipeline housing development projects that have not yet been completed during this planning cycle. These include pending, approved or permitted housing development projects that are expected to receive a Certificate of Occupancy (COO) after the beginning of the 2021-2029 planning period. The City conservatively estimates that 101,662 pending, approved or permitted housing development projects that are expected to receive a COO after the beginning of the 2021-2029 planning period and therefore count towards the 6th cycle RHNA need. Of these, approximately 36,316 have already received approval by the City and therefore are not analyzed in this study, except under a cumulative impact analysis.¹¹ This analysis included units anticipated to result from the data sources shown in Table 4.

⁹ This includes the pending updates to the following Community Plans: Hollywood, Downtown Los Angeles, and Boyle Heights. These pending plan updates are identified as implementation programs in the Draft Housing Element.

¹⁰ As reported in the City's Housing Element Annual Progress Reports for those years.

¹¹ These units would have been cleared under CEQA previously either with a new CEQA clearance, a finding they were previously subject to environmental review in a prior clearance or are exempt, including under a ministerial exemption. They will be considered under cumulative impact analysis unless already constructed and operational.

Table 4 City of Los Angeles Pipeline Housing Units Expected to Receive Certificate of Occupancy (COO) During Sixth Cycle, 2012-2019

Project Type	Net Units Added	% Units Expected to Reach COO ¹²	Units Expected to Reach COO
Active Planning Entitlements	174,955	37%	65,346
Approved Planning Entitlements with No Building Permit	72,294	45%	32,532
Approved Building Permits with No COO (Since March 2020) ¹³	4,790	79%	3,784
Total	252,039		101,662

As a result, the City conservatively estimates that the Inventory of Sites will identify a total capacity of 408,412 units.

Anticipated Geographic Distribution of Sites Inventory

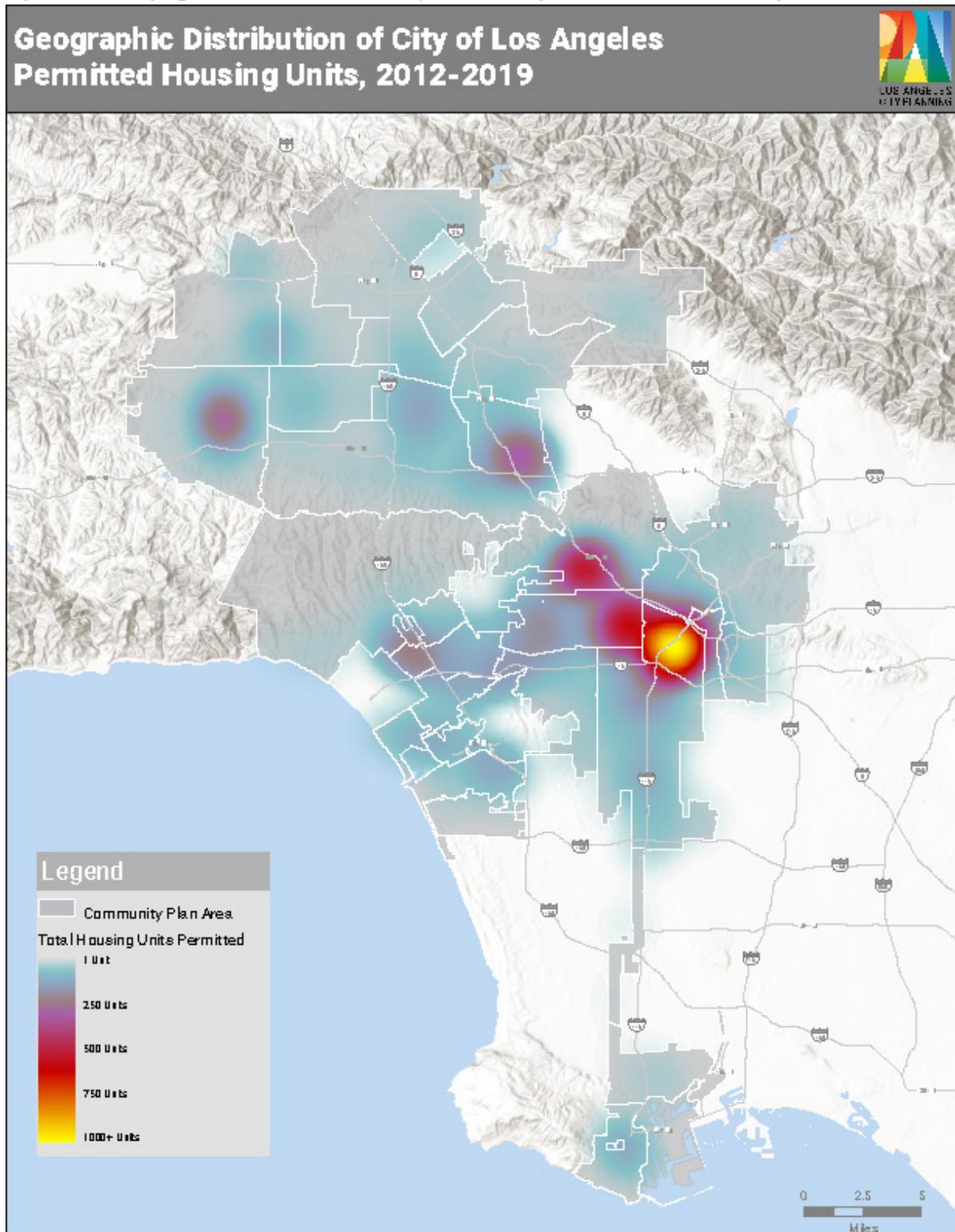
For at least two decades, the City of Los Angeles has been pursuing an approach to accommodating long-range growth as established in the Framework Element of the General Plan, first adopted in 1995. The goals and policies of the Framework Element encourage sustainable growth in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit. The Housing Element helps to fulfill this strategy.

Although housing is allowed in the City in all residential and commercial zones and some industrial zones (through adaptive reuse rules), it is reasonable to assume that the geographic distribution of the identified capacity will largely be consistent with that of recent building permit activity and areas of the City that are currently zoned for multi-family and commercial development; however, it is possible that sites are identified in any area where the zoning permits residential uses, including lower density residential sites. Based on the City’s existing growth strategy, much of this capacity is likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. A large portion of the anticipated housing capacity is expected to be located within a Transit Oriented Communities Area, which is defined as the half-mile radius of a Major Transit Stop. Figure 3 illustrates the potential geographic locations in which sites are likely to be identified, including areas zoned for residential use and areas located within a half-mile of a Major Transit Stop. Figure 4 illustrates the locations of recently permitted housing development projects (using the data from Table 3), which provide further context regarding geographic areas that are likely to be identified.

¹² Based on City Planning analysis of existing pipeline production data, average completion rate (2018-2019).

¹³ Building permits issued since March 2020 will still be valid by October 2021 since building permits are valid for 18 months.

Figure 4 Geographic Distribution of City of Los Angeles Permitted Housing Units, 2012-2019



Rezoning Program

Anticipated Rezoning Program and Assumptions

Total Rezone Need Estimate

Based on the estimated capacity of 408,412 units that is previously assumed, and the total target capacity of 501,642 units, it is conservatively estimated that the Housing Element will need to include a program to rezone for the creation of 93,230 additional units of capacity.

Approach and Assumptions

The Rezoning Program, which would need to be completed by 2024, will likely be accomplished through updates to the City's Community Plans (Land Use Element), an update to the City's Density Bonus program, targeted zone changes, updates to specific plans and overlays, or other zoning ordinances. These programs would likely identify opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, and in higher resource areas. These programs may also consider rezoning or development incentives in existing lower density residential zones to create opportunities for missing middle housing typologies (up to low-medium residential density) in these areas.

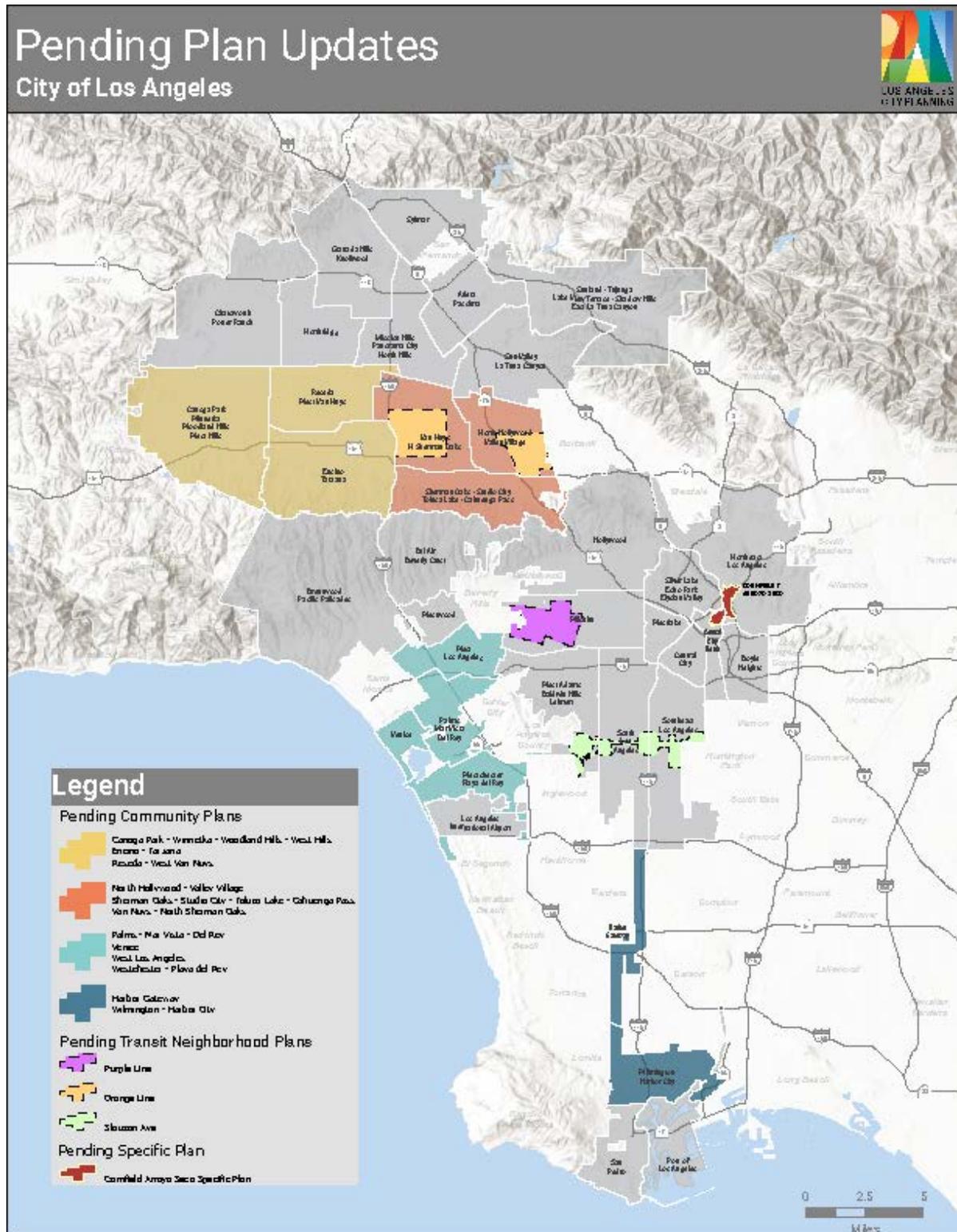
Rezoning programs will do all of the following:

1. **Evaluation and Rezoning to Comply with AFFH Requirements.** Evaluate geographic distribution of identified capacity to determine how well it complies with AFFH requirements; if it is determined that the sites inventory results in an over-concentration of lower-income sites in areas of high segregation and poverty, the rezoning program will work to identify and prioritize areas for upzoning in areas of moderate, high, and highest resource.
2. **Identification of Pending Community Plan Updates and Transit Neighborhood Plans.** Identify existing/planned opportunities for rezoning in forthcoming Community Plan Updates, Transit Neighborhood Plans and Specific Plan Updates. Table 5 lists the 12 pending Community Plan Updates, three pending Transit Neighborhood Plans and one pending Specific Plan Update. The geographic locations of the pending plan Updates are illustrated in Figure 5.

Table 5 Pending Community Plan Updates, Transit Neighborhood Plans and Specific Plan Updates

Pending Community Plans
Canoga Park-Winnetka-Woodland Hills- West Hills
Encino-Tarzana
Reseda-West Van Nuys
North Hollywood - Valley Village
Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass
Van Nuys - North Sherman Oaks
West Los Angeles
Westchester-Playa Del Rey
Venice
Palms-Mar Vista-Del Rey
Harbor Gateway
Wilmington - Harbor City
Pending Transit Neighborhood Plans
Purple Line Transit Neighborhood Plan
Orange Line Transit Neighborhood Plan
Slauson Transit Neighborhood Plan
Pending Specific Plan Updates
Cornfield Arroyo Seco Specific Plan (CASP)

Figure 5 Pending Community Plan Updates, City of Los Angeles



3. **Further Programs for Rezoning.** Identify further actions that will be taken to make sites available during the planning period with appropriate zoning and development standards. Such a program could include, but would not be limited to:
- a. An update to the City’s Density Bonus program, which could include amendments to the City’s Zoning Code to:
 - i. establish additional development incentives for 100 percent affordable developments and mixed-income projects that provide additional affordability
 - ii. expand areas and types of projects where affordable housing incentives apply
 - iii. provide incentives for alternative building typologies such as micro-units, adaptive reuse of existing structures, and low- to medium-scale multi-family housing (“missing-middle”).
 - iv. expand transit-oriented incentives along transit-served commercial corridors
 - v. provide incentives for development projects in higher resource areas
 - vi. allow affordable housing projects on publicly-owned land, as well as land owned by other entities such as school districts, public and private colleges, religious or faith-based institutions, hospitals, and non-profit organizations.
 - vii. expand by-right development and objective design standards;
 - b. An amendment to the City’s Zoning Code to permit residential uses in certain Parking (P) Zones and Public Facilities (PF) zones;
 - c. An update to the City’s ADU Ordinance to further facilitate development of ADUs;
 - d. Targeted rezones of sites that meet certain criteria, including, but not limited to, proximity to public transportation, jobs, amenities, and higher opportunities; and/or
 - e. Rezoning of publicly-owned land to facilitate multi-family residential development and affordable housing development, including City-owned land and land owned by public agencies with surplus land suitable for residential development.

Anticipated Geographic Distribution of Rezoning Program

As previously described, it is anticipated that some or most of the shortfall will be accommodated through rezoning efforts in the pending Community Plan Updates. Most rezoning is anticipated to occur in geographic areas that are similar to those identified in the Inventory of Sites (i.e. areas near public transit, jobs, and in existing growth areas identified in the Framework Element).

It is reasonably foreseeable that rezoning would occur in areas identified in the General Plan including near transit corridors and stations, job centers, neighborhood services and amenities, and particularly in higher resourced areas to provide a more equitable distribution of housing opportunities.

This distribution aligns with State law regarding AFFH goal of prioritizing the identification of sites in higher resource areas, as indicated on Figure 2.

Pursuant to Government Code section 65583.2(h), for any rezoning needed to accommodate a RHNA shortfall for lower income households, the Housing Element Update will include an inventory of potential sites for rezoning. The inventory of potential sites for rezoning would include specified density ranges that could be achieved through a rezoning program; however, the inventory would not constitute formal adoption of any rezoning. Rezoning would occur as a subsequent discretionary action.

6. Description of Safety Element Update

The Safety Element is one of the eight State-mandated elements of the General Plan. The purpose of the update to the Safety Element is to comply with recent State legislation and guidelines (such as Assembly Bill 162, Senate Bill 1241, Senate Bill 99, Assembly Bill 747, Senate Bill 1035 and Senate Bill 379). Technical amendments will be made to the Safety Element to achieve compliance with State, regional and local policies and guidelines. The technical amendments will incorporate data and maps, address vulnerability to climate change; incorporate policies and programs from the City's updates to the Local Hazard Mitigation Plan and the Floodplain Management Plan, as well as partial or full integration of other recent city documents (including but limited to: Resilient Los Angeles, L.A. Green New Deal/2019 Sustainability Plan and the Emergency Management Department Emergency Plans and Annexes). The Safety Element amendments will be submitted to the California Geological Survey, California Office of Emergency Services, California State Board of Forestry and Fire Protection, and Federal Emergency Management Agency for review.

7. Proposed Project

Housing Element Update

The proposed project involves an update to the Housing Element of the City of Los Angeles General Plan. As described in *Description of the Housing Element Update*, the proposed Housing Element Update establishes programs, policies and actions to generally further the goal of meeting the existing and projected housing needs of all family income levels of the City, and to accommodate the RHNA allocation through the year 2029, as established by SCAG.

Under State Housing Element law, the Project is required to demonstrate the zoned capacity needed to accommodate the development of the RHNA allocation using various land use planning strategies. The City provides capacity for housing through local zoning regulations. The City, however, is not required to physically construct 455,577 units as a result of the RHNA allocation.

This project takes a conservative approach by analyzing the reasonable "worst case" scenario of environmental impacts from future implementation of the 2021-2029 Housing Element, which is the full build-out of the City's RHNA allocation. The most significant potential impact under this approach is the potential construction and operation of between 419,261 and 429,261 housing units (hereafter referred to as "project development"), which represents the City's current Draft RHNA allocation of 455,577 units, less the 36,316 already approved pipeline

housing units expected to receive a COO during the 6th cycle. The high end of the range reflects a 10,000-unit buffer, to account for potential increases to the final RHNA allocation figure. The RHNA allocation represents the City's housing goal over the eight-year planning period. Analyzing the production of between 419,261 and 429,261 units is intended to provide a conservative analysis of the reasonable worst-case scenario of environmental impacts from future implementation of the 2021-2029 Housing Element.

These units may occur anywhere in the City where residential uses are permitted, as described below. While some units are anticipated to be built on the Opportunity Sites identified in the Housing Element Inventory of Sites, it is not reasonable to expect that housing development will occur solely on those Opportunity Sites. Housing may occur on any site that is currently zoned for residential use; whereas the Opportunity Sites are subject to a number of requirements to demonstrate realistic likelihood of development and are intended to demonstrate existing zoned capacity to accommodate the City's RHNA allocation (see *Background*). In addition, these units may also occur on sites that do not currently allow residential uses or multi-family residential uses of adequate density and will be rezoned in the future under a Housing Element rezoning implementation program (i.e., Rezoned Sites).

The anticipated 419,261 and 429,261 units may occur in any of the following types of development:

- multi-family residential development, ranging from small apartment buildings with two to 10 units, medium apartment buildings with between 11-49 units, large apartment buildings with between 50-200 units, or larger apartment buildings and high-rise structures with more than 200 units;
- single-family residential development ranging in size and scale from smaller single-family homes to larger single-family homes, small-lot subdivisions, and new single-family subdivisions;
- ADUs including attached ADUs, detached ADUs, Junior ADUs, ADUs converted from existing floor area, multiple ADUs on lots with existing multi-family dwellings, and Movable Tiny Houses;
- mixed-use development, ranging in size and scale from neighborhood commercial mixed use with smaller nonresidential uses, to high-rise mixed-use with larger nonresidential uses; and
- conversion and/or rehabilitation of existing nonresidential, residential and mixed-use structures to be used for housing.

In addition to the general areas shown in Figure 3 and Figure 4, these units may occur in any of the following types of locations:

- sites currently zoned for residential uses, including multi-family and single-family uses;
- sites currently zoned for commercial uses, which permit residential uses;
- sites currently zoned for hybrid industrial uses, which permit joint live-work residential uses;

- non-vacant sites, and sites with existing housing units;
- sites located near public transportation;
- sites located in a Historic Preservation Overlay Zone; and
- sites located in areas with special environmental considerations, such as areas located near Open Space, Hillside Areas, Very High Fire Hazard Severity Zones (VHFHSZ), or the Coastal Zone.

While housing development may generally occur in any of the conditions previously described, certain types of housing development and certain types of locations are anticipated to be more prevalent than others. These assumptions are made and supported by an analysis of the types and locations of housing development that have historically been permitted in the City.¹⁴ Based on this analysis, the City conservatively estimates that of the 419,261 and 429,261 units expected to be developed by 2029, they are expected to occur in the following types of housing projects shown in Table 6.

Table 6 Anticipated Housing Units, by Type of Development

Housing Type	Share of Total Permit Activity (%)	Anticipated Number of Housing Units (range)
Single-family and duplex (including ADUS)	18.3	76,705 to 78,534
Multi-family	50.3	211,003 to 216,036
Mixed-use	31.4	131,553 to 134,691
Total	100%	419,261 to 429,261

8. Required Approvals

The project requires review of the draft amendments for the Safety Element Update by California Geological Survey, California Office of Emergency Services, California State Board of Forestry and Fire Protection, and the Federal Emergency Management Agency.

The project requires the following discretionary approvals from the City:

- Adoption of the 2021-2029 Housing Element Update
- Adoption of the 2021-2029 Housing Element Update EIR
- Adoption of technical amendments to General Plan Elements, including but not limited to the Safety Element, Framework and other elements as needed to ensure consistency with the updated Housing Element

¹⁴ Based on analysis of building permits issued for housing development projects from 2009 to 2019 in the City of Los Angeles.

- Future Legislative Actions to Implement Programs, including rezoning program, to comply with State law.

The project additionally requires the following approval from HCD prior to the City's final adoption of the 2021-2029 Housing Element Update:

- Review of the draft 2021-2029 Housing Element Update to determine compliance with state law and submittal of written findings to the City.

No discretionary approvals from other agencies are required.

9. Other Public Agencies Whose Approval is Required

The HCD reviews and determines whether the Housing Element Update complies with State law. Aside from HCD, no other approvals by outside public agencies are required.

10. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

The City prepared and mailed AB 52 notification letters to each tribe listed by the Native American Heritage Commission (NAHC) on November 12, 2020. The Fernandeño Tataviam Band of Mission Indians requested consultation. The initial meeting was held on December 1, 2020. The consultation is ongoing, and a summary of the consultation process will be discussed in the *Tribal Cultural Resources* section of the EIR. No other tribes requested consultation.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

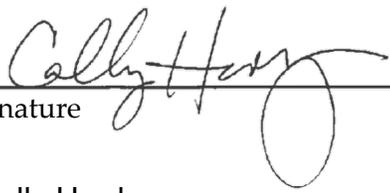
Determination

Based on this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- I find that the proposed project MAY have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

Cally Hardy

Printed Name

January 13, 2021

Date

City Planning Associate

Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to aesthetics.

Housing Element Update

Scenic views generally refer to visual access to, or the visibility of, a particular natural or man-made visual resource from a given vantage point or corridor. Focal views focus on a particular object, scene, setting, or feature of visual interest. Panoramic views, or vistas, provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over urban or natural areas that provide a geographic orientation and view not commonly available. Examples of panoramic views might include an urban skyline, a valley, a mountain range, the ocean, or other water bodies. The City's General Plan Conservation Element defines scenic views or vistas as the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views is typically from park lands, publicly owned sites, and public rights-of-way (City of Los Angeles 2001).

Los Angeles is generally bounded by the San Gabriel Mountains and Santa Susana Mountains to the north and the Palos Verdes Hills and Pacific Ocean to the south and west, which are some of the most prominent scenic resources in the City. The Santa Monica Mountains extend across the middle of the City from the east to Griffith and Elysian Parks. The San Gabriel Mountains and Santa Monica Mountains are the most visible features from many areas of the City. The Los Angeles River and its associated tributaries and flood plains are also prominent topographic features; however, they can only be seen from close-up foreground views. In the western portions of the City, the Pacific Ocean is a prominent scenic resource (City of Los Angeles 2001). Manmade scenic resources within the City include urban skylines, such as Downtown Los Angeles, the Hollywood Sign and Griffith Observatory, public parks, and historic buildings throughout the City, such as historic theaters, hotels, and districts.

The City of Los Angeles has established several regulatory requirements for the preservation of aesthetic resources within the City. The following are summaries of the regulatory compliance measures (RCMs) related to aesthetics that the proposed project would be subject to:

- **RCM-AE-1 (Hillside):** To ensure consistency with the Baseline Hillside Ordinance, the project is required to comply with the City's Hillside Development Guidelines, including, but not limited to, setback requirements, residential floor area maximums, height limits, lot coverage and grading restrictions.
- **RCM-AE-2 (LA River):** Compliance with provisions of the Los Angeles River Improvement Overlay District. The project is required to comply with development regulations set forth in Section 13.17.F of the Los Angeles Municipal Code (LAMC) as applicable, including, but not necessarily limited to, landscaping, screening/fencing, and exterior site lighting.
- **RCM-AE-3 (Vandalism):** Compliance with provisions of the Los Angeles Building Code. The project is required to comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to LAMC Section 91.8104.15.
- **RCM-AE-4 (Signage):** Compliance with provisions of the Los Angeles Building Code. The project is required to comply with the LAMC Section 91.6205, including on-site signage maximums and multiple temporary sign restrictions, as applicable.
- **RCM-AE-5 (Temporary Signage on Temporary Construction Walls):** Compliance with provisions of the Los Angeles Building Code. The project is required to comply with the LAMC Section 14.4.17, including, but not limited to, the following provisions:
 - The applicant is required to obtain a permit for any temporary sign on a temporary construction wall.
 - The area of the sign cannot extend above the top of the wall or fence and is required to comply with the requirements under Section 14.4.17.B.
 - Signs are to remain for as long as the building permits associated with the construction site remain in effect or for a period of two years, whichever is less.
 - Signs may only be placed to a maximum height of eight feet.
 - Temporary signs surrounding vacant lots are limited to lots located in a commercial or industrial zone.
- **RCM-AE-6 (Outdoor Lighting Affecting Residential Property):** Compliance with provisions of the Los Angeles Electrical Code. The project is required to comply with the LAMC Section 93.0117 which regulates lighting intensity or direct glare and is applicable to any exterior light source, lamp holder, or sign light source.
- **RCM-AE-7 (Height of Building or Structures):** Compliance with provisions of the Los Angeles Height Districts and any additional applicable provisions regulating height or massing in Specific Plan Areas. The project is required to comply with LAMC Sections 12.21.1 through 12.21.6, and any applicable Specific Plan regulation (as enumerated in LAMC Section 12.04), in which the total floor area, number of stories, and overall height cannot exceed those limits for the district in which the building or structure is located.
- **RCM-AE-8 (Coastal Development Permits):** Compliance with provisions of the LAMC Section 12.20.2, which enforces the California Coastal Act of 1976 and helps protect the State's natural and scenic resources along in coastal zones. Project applicants are required to apply for, and obtain, a Coastal Development Permit for any development in the Coastal Zone.
- **RCM-AE-9 (Site Plan Review):** Compliance with provisions of Section 16.05, which requires a site plan review for any project that creates, or results in, an increase of 50 or more dwelling units or 50,000 gross square feet or more of nonresidential floor area. Project applicants are required to obtain a site plan review prior to issuance of any grading permit, foundation permit, building permit, or use of land permit.

In addition to the previously listed RCMs, the proposed project would also be subject to any applicable regulations intended to protect scenic and visual resources established in adopted specific plans and overlay zones, such as the Mulholland Scenic Parkway Specific Plan (1992), San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (2004), Historic Preservation Overlay Zones (HPOZ), and Community Design Overlays (CDO). For example, the Mulholland Scenic Parkways Specific Plan and San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan further establish specific regulations for Mulholland Drive and the San Gabriel/Verdugo Mountains related to land use, prominent ridgelines, viewsheds, vista points, lighting, signage, and building heights and massing (City of Los Angeles 1992; City of Los Angeles 2003). Overlays further implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. For example, CDOs contain design guidelines that enhance the visual identity and character of a neighborhood. They can apply to new development projects and to improvements to existing properties.

a. Would the project have a substantial adverse effect on a scenic vista?

The project would have the potential to affect scenic vistas if new or intensified development blocked such vistas including, views of the ocean, striking or unusual natural terrain, or unique urban or historic figures (City of Los Angeles 2001). Potential impacts could include obstructing views of scenic resources such as the San Gabriel and Santa Susana Mountains or the Pacific Ocean currently available from public vantage points. However, the proposed project would prioritize the development of new housing on infill sites in areas with existing public transit infrastructure. More specifically, a large portion of anticipated housing is expected to be located within a Transit Oriented Communities Area, which is defined as the half-mile radius of a Major Transit Stop. Therefore, while Rezoned Sites would allow for the development of new housing, potentially at higher densities than currently present on areas identified for rezoning, the Rezoned Sites would be in existing developed areas in the City, and would generally not be in areas of the City that are adjacent to scenic resources such as the mountainous and beach areas. Therefore, development on these sites is not expected to result in significant adverse impacts to a scenic vista.

Furthermore, future project developments would be required to comply with zoning and overlay regulations, including specific plan or community plan development regulations, that implement General Plan goals and policies intended to protect scenic and visual resources. These include landform protection and scenic features protection in the City's General Plan Conservation Element and Scenic Highways protection in the Mobility Element, as well as those regulations in RCM-AE-1 (Hillside), RCM-AE-2 (LA River), RCM-AE-8 (Coastal Development Permits) for development in the vicinity of potentially scenic resources such as hillsides, the Los Angeles River, and Coastal Zones. Certain specific plans, such as the Mulholland Scenic Parkways Specific Plan and San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan also include development regulations related to prominent ridgelines, viewsheds, and vista points, (City of Los Angeles 1992; City of Los Angeles 2003). Any project within a specific plan is required to comply with the associated Zoning Code regulations. Furthermore, any project with more than 50 housing units requires a site plan

review per LAMC Section 16.05(c), which consists of a process to review development with respect to their sites, surrounding properties, and environmental setting to identify any potential impacts. Therefore, potential development under the project would not result in substantial adverse effects on scenic vistas and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

According to the California State Scenic Highway System Map, the Pasadena Freeway (State Route [SR] 110) from East Colorado Boulevard in the City of Pasadena to the Santa Ana Freeway (SR 101) in Los Angeles is a designated Federal Scenic Byway (California Department of Transportation [Caltrans] 2020). Topanga Canyon Boulevard (SR 27) from SR 1 to the City of Los Angeles' northwestern boundary was recently designated as a State Scenic Highway and is the only officially designated route in the City. In addition, there are several highways in and adjacent to the City that are eligible for listing as a State Scenic Highway (Caltrans 2020). Portions of Pacific Coast Highway (SR 1) from Venice Boulevard in the City and north through Ventura and Santa Barbara Counties and Ronald Reagan Freeway (SR 118) from the western boundary of the City to Ventura County are eligible for designation as a State Scenic Highway (Caltrans 2020).

While the geographic distribution of development would largely occur in areas of the City that are currently zoned for multi-family and commercial development in proximity to transit (see Figure 2-3), it is possible that individual project development sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of a designated State Scenic Highway or roadways eligible for listing as State Scenic Highways. However, if development under the proposed project occurred in the vicinity of an eligible State Scenic Highway, individual projects would be required to comply with City regulations that would minimize potential impacts to scenic resources, such as protected trees or historic buildings. Furthermore, the City designates HPOZs to protect neighborhoods with distinct architectural and cultural resources, and to govern the review of project applications. See Section 4, *Biological Resources*, which refers to the ordinances related to protected and heritage trees, and Section 5, *Cultural Resources*, which includes RCM-CR-1 (Permits for Historical and Cultural Buildings). Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

As discussed above, the proposed project involves the potential construction and operation of between 419,261 and 429,261 housing units. Based on the City's existing growth strategy, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. For those sites identified in the Inventory of Sites, project development would need to comply with applicable zoning (i.e., floor area ratio (FAR), building heights and setbacks, and height requirements) and other regulations governing scenic quality and, therefore, would not be expected to result in impacts to existing visual character or quality of public views. Furthermore, the Rezoning Program would primarily target rezones of sites with proximity to public transportation and jobs. Nonetheless, it is also possible that sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites with a particular visual character. As such, the proposed project would facilitate new residential development and allow for higher densities than currently exists in some areas and may have the potential to visually degrade the character or quality of sites or areas of the City or surrounding areas (e.g., change FAR, building height, and massing), particularly for sites identified as part of the Rezoning Program. The project's potential impacts related to visual character or quality of public views of the proposed project on sensitive receptors will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

Most of the City is highly urbanized with existing sources of light and glare. As part of the Housing Element Update, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. While most project development would occur in urbanized areas with existing sources of light and glare, project sites could be identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites that are not currently exposed to significant sources of light or glare. It could be reasonably anticipated that illumination from new development (security lighting, parking lot lighting, ornamental lighting, pedestrian scale lights, lighting from ground floor storefronts and signs) would increase overall lighting levels in areas where increased development is expected to occur as the result of implementation of the Housing Element Update. In addition, it could be anticipated that project development, particularly development projects of substantial scale, would result in the introduction of lighting in areas where currently lighting levels are low or where lighting levels along sidewalks is interrupted by darkened or shadowed areas. It is also possible that additional sources of nighttime

lighting associated with increased development capacity, crime prevention, and increased vehicle traffic would be implemented.

However, dense transit corridors are characterized by existing residential, commercial, and civic development uses that already incur high ambient levels of nighttime lighting, any additional lighting from new development would be incremental. Furthermore, project development, whether in transit corridors or elsewhere would be required to comply with the lighting provisions of the LAMC to reduce potential impacts from light. LAMC Section 12.21 A.5(k) (amended by Ordinance No. 171,858) states that all lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any street and any adjacent premises. In addition, any new lighting would be designed to conform to applicable standards, including LAMC Sections 93.0117 and 12.21 A.5(k), which pertain to outdoor lighting affecting residential property (no more than two foot-candles of lighting intensity from a light source is allowed on adjacent residential property). Furthermore, the proposed project would be required to comply with RCM-AE-4 (Signage), which provides regulations for signage (including signage lighting) in the City, and RCM-AE-6 (Outdoor Lighting Affecting Residential Property), which regulates lighting intensity from any exterior light source, lamp holder, or sign light source. Other specific LAMC lighting standards applicable to the Housing Element Update include:

- Chapter 1, Article 2, Section. 12.21 A5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and any adjacent premises.
- Chapter 1, Article 7, Section. 17.08C. Plans for street lighting system shall be submitted to and approved by the Bureau of Street Lighting.
- Chapter 9, Article 3, Section. 93.0117. No exterior light source may cause more than two foot-candles (21.5 lux) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.
- Chapter 9, Article 1, Section 91.6205 (K)4. Signs are prohibited if they contain flashing, mechanical and strobe lights in conflict with the provisions of Section 80.08.4 and 93.6215 of this code.
- Chapter 9, Article 1, Section 91.6205M. No sign shall be arranged and illuminated in such a manner as to produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Glare is a common phenomenon in the City primarily due to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region. Daytime glare can result from sunlight reflecting off glass, other structural fixtures of buildings, and windshields of parked and moving vehicles within the roadways in the City. Although a large portion of existing structures in the City are comprised of non-reflective materials such as concrete, wood, stucco and plaster, some structures, particularly in the commercial districts of the City, consist of considerable amounts of reflective floor-to-ceiling glass windows.

Project development would be required to comply with LAMC standards and regulations for lighting and glare affecting sensitive residential uses, which discourage the use of highly reflective or deeply tinted glass. Specifically, as listed in RCM-AE-6 (Outdoor Lighting Affecting Residential Property), LAMC Section 93.0117 direct glare from any light source, where “direct glare” is defined as glare resulting from high luminance or insufficiently shielded light sources that is in the field of view.

While the Housing Element Update involves increased development and density, new housing would primarily consist of infill development in areas with substantial sources of existing light and glare. Even in non-transit corridor areas, development would be required to comply with existing regulations for light and glare discussed above. Light and glare associated with the Project development may incrementally increase daytime and nighttime light and glare in the area. However, due to the urbanized nature of the region and with compliance with applicable regulations in the LAMC, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide

consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to agriculture and forestry resources.

Housing Element Update

- a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

According to the California Important Farmland Finder Map, the City contains land designated as Prime Farmland and Unique Farmland (California Department of Conservation [DOC] 2020). As part of the Housing Element Update, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. While it is possible that as part of the Rezoning Program development sites could be identified in areas that are designated as Important Farmland, it is reasonable to assume that the geographic distribution of project development would largely be consistent with that of recent building permit activity and areas of the City that are currently zoned for multi-family and commercial development. Therefore, the proposed project would not likely convert important Farmland to non-agricultural uses and impacts would be less than significant.

LESS THAN SIGNIFICANT

- b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*

In addition to the Important Farmland discussed under impact *a.* of this section, the City contains other land zoned for agricultural use, consisting of A1 and A2 Zones. The A1 and A2 Zones in the City allow for single-family residential uses and include existing standards to limit the intensity of development. Conditions for development and allowed uses in agricultural zones must adhere to LAMC Sections 12.05 and 12.06. The distribution of project development would largely occur in areas of the City that are currently zoned for multi-family and commercial development in proximity to transit (see Figure 2-3). Nonetheless, it is possible that individual project development sites are located in A1 or A2 zones, and that new single-family residences or ADUs are built on these sites. However, such development is not likely or anticipated on a level that would significantly conflict with the sites' use as agricultural land. Furthermore, according to the DOC, there are no Williamson Act contracts in the City (DOC 2016). Therefore, the proposed project would not likely conflict with existing zoning for agricultural use or a Williamson Act contract and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

“Forest land” is defined in PRC Section 12220(g) pursuant to the California Forest Legacy Program Act of 2007 as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Per the City of Los Angeles Conservation Element, the only substantial conifer and big tree forests in the vicinity of Los Angeles are located outside the City’s boundaries in the Angeles National Forest and on the north slope of the Santa Susana Mountains, mostly within the Santa Clarita Woodlands Park (2001). Angeles National Forest managed by the U.S. Forest Service and the Santa Clarita Woodlands Park is managed by the Santa Monica Mountains Conservancy (City of Los Angeles 2001). Both of these forested areas are protected land and neither is zoned for timberland or Timberland Production, or land that has been protected under the California Forest Legacy Program. While the majority of the City is urbanized with limited forest land, there are mountains and hillsides within the City that support native trees and have been designated as Open Space. Nonetheless, the City does not have existing zoning for forest land or timberland that would be rezoned as part of the Rezoning Program. While the Rezoning Program could result in development on hillside areas that could be considered “forest land” under PRC Section 12220(g), LAMC Section 12.04 does not allow for residential development on areas zoned for Open Space. Because forests land and open space that could support native trees are limited within the City, and provisions of the Municipal Code do not allow for residential development on areas designated as Open Space, the proposed project would have a less than significant impact on forest land or forestry resources.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

As described under impact discussion c. of this section, there is limited forest land in the City. The nearest forest areas are located in the Angeles National Forest and Santa Susana Mountains. Both of these forests are protected resources and would not be impacted by project development. The forest land and open space that exists within the City is limited in its distribution and residential development in these areas would not be allowed in accordance to the LAMC Section 12.04. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use and there would be a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

- e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

As discussed under impact discussions *a.* through *d.* of this section, the City of Los Angeles is urbanized, but does include zones for agricultural use and open space that can support native tree cover. In addition, the City contains land designated as Prime Farmland and Unique Farmland (California Department of Conservation [DOC] 2020). Furthermore, residential development in areas zoned for Open Space is prohibited by the LAMC. While it is possible that individual housing project sites would be located in any area where the zoning permits residential uses, such as single-family or ADU development on agricultural zones, it is reasonable to assume that the geographic distribution of project development would largely be consistent with that of recent building permit activity and areas of the City that are currently zoned for multi-family and commercial development. Therefore, such development is not likely or anticipated on a level that would significantly conflict with the sites' use as agricultural land. The proposed project would not involve other changes in the existing environment which could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. There would be a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	■	□	□	□
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	■	□	□	□
c. Expose sensitive receptors to substantial pollutant concentrations?	■	□	□	□
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	□	□	■	□

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to air quality.

Housing Element Update

Air Quality Standards and Attainment

The City of Los Angeles is in the South Coast Air Basin (Basin), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor

air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether the standards are met or exceeded, the Basin is classified as being in “attainment” or “nonattainment.” Under State law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SCAQMD is in non-attainment for the federal standards for ozone and PM_{2.5} (particulate matter up to 2.5 microns in size) and the State standards for ozone, PM₁₀ (particulate matter up to 10 microns in size), and PM_{2.5}. The Los Angeles County portion of the Basin is also designated non-attainment for lead (SCAQMD 2016). The Basin is designated unclassifiable or in attainment for all other federal and State standards. The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 7.

Table 7 Health Effects Associated with Non-Attainment Criteria Pollutants

Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ^a
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. ^a

^a More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: U.S. EPA, <http://www.epa.gov/airquality/urbanair/>

Air Quality Management

The SCAQMD administers the Air Quality Management Plan (AQMP) for the Basin, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board on March 3, 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to

traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gas (GHG) emissions and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017). The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal 8-hour ozone standard of 0.070 ppm that was finalized in 2015.

The Final 2016 AQMP addresses several State and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The SCAG's projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 RTP/SCS are integrated into the 2016 AQMP. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (2020 RTP/SCS), or *Connect SoCal*, which builds upon the progress made through implementation of the 2016 RTP/SCS, and was developed through a four-year planning process to update population, housing and employment data as well as transportation strategies for the region through the horizon year of 2045. The impact analysis throughout this Initial Study uses the demographic data provided in the 2020 RTP/SCS; however, SCAQMD has not updated the 2016 AQMP to incorporate these new demographic projections, which is expected to occur in 2022.

The 2016 AQMP builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The Plan also demonstrates strategies for attainment of the new federal eight-hour ozone standard and vehicle miles traveled (VMT) emissions offsets, pursuant to recent United States Environmental Protection Agency (U.S. EPA) requirements (SCAQMD 2017).

Air Emission Thresholds

The State CEQA Guidelines (Section 15064.7) provide that, when available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make determinations of significance. These thresholds are designed such that a project that would not exceed the adopted thresholds would not have an individually or cumulatively significant impact on the Basin's air quality. Therefore, a project that does not exceed these SCAQMD thresholds would have a less than significant impact. This Initial Study conforms to the methodologies recommended in the SCAQMD's *CEQA Air Quality Handbook* (1993) and supplemental guidance provided by the SCAQMD, including recommended thresholds for emissions associated with both construction and operation of the project (SCAQMD 2015).

Table 8 presents the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions for individual projects. These represent the levels at which a project’s individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the Basin’s existing air quality conditions.

Table 8 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of ROG	55 pounds per day of ROG
100 pounds per day of NO _x	55 pounds per day of NO _x
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO _x	150 pounds per day of SO _x
150 pounds per day of PM ₁₀	150 pounds per day of PM ₁₀
55 pounds per day of PM _{2.5}	55 pounds per day of PM _{2.5}

Notes: ROG = Reactive Organic Gases; NO_x = Nitrogen oxides; CO = Carbon monoxide; SO_x = Sulfur oxides
 Source: SCAQMD 2015

SCAQMD Regulations and State Regulations

The following are summaries of RCMs associated with SCAQMD or State regulations related to air quality that the proposed project would be subject to:

- **RCM-AQ-1 (Demolition, Grading and Construction Activities):** The project is required to comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
 - All unpaved demolition and construction areas would be wetted at least twice daily during excavation and construction, and temporary dust covers would be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
 - The construction area would be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
 - All clearing, earth moving, or excavation activities would be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
 - All dirt/soil loads would be secured by trimming, watering or other appropriate means to prevent spillage and dust.
 - All dirt/soil materials transported off-site would be either sufficiently watered or securely covered to prevent excessive amount of dust.
 - General contractors are to maintain and operate construction equipment so as to minimize exhaust emissions.
 - Trucks having no current hauling activity would not idle but be turned off.
 - Vehicle speeds would be limited to 15 mph on unpaved roads.

- **RCM-AQ-2 (Idling of Diesel-fueled Commercial Vehicles):** In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction would be limited to five minutes at any location.
- **RCM-AQ-3 (Operation of Diesel-fueled Commercial Vehicles):** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specified fuel and fuel additive requirements and emission standards.
- **RCM-AQ-4 (Architectural Coatings):** The project is required to comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.
- **RCM-AQ-5 (Odor-Reducing Equipment):** The project is required to install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.
- **RCM-AQ-6 (Emission Control Measures):** New on-site facility nitrogen oxide emissions would be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.
- **RCM-AQ-7 (Spray Painting):** Compliance with provisions of the South Coast Air Quality Management District (SCAQMD) District Rule 403. The project is required to comply with all applicable rules including the following:
 - All spray painting would be conducted within an SCAQMD-approved spray paint booth featuring approved ventilation and air filtration system.
 - Prior to the issuance of a building permit, use of land, or change of use to permit spray painting, certification of compliance with SCAQMD air pollution regulations would be submitted to the Department of Building and Safety.

a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

According to SCAQMD, a project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and SCAG forecasts of regional population, housing, and employment growth in the development of the AQMP for the Basin.¹⁵ As such, projects that are consistent with the growth anticipated by local plans would not conflict with the AQMP. If a project is less dense than anticipated by the local plans, the project would likewise be consistent with the AQMP.

The purpose of the Housing Element Update is to comply with State housing element law requiring the City to show it has adequate land designated to accommodate the existing and

¹⁵ On September 3, 2020, SCAG formally adopted the 2020-2045 RTP/SCS. However, the 2016 AQMP was adopted prior to this date and relies on the demographic and growth forecasts of the 2016-2040 RTP/SCS; therefore, these forecasts are utilized in the analysis of the project's consistency with the AQMP.

projected housing needs reflected in the City's RHNA, which is based on the regional population forecasts. The RHNA does not encourage or promote growth, but rather requires communities to address the projected growth and provide its fair share of the regional housing needs to accommodate the forecasted growth.

As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units. The proposed project would concentrate growth in the City as opposed to elsewhere in the SCAQMD region. Based on the City's existing growth strategy, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located in proximity to public transportation. Project development would primarily accommodate forecasted population growth and relieve overcrowding and existing housing cost burden. However, the project does have the potential to result in additional population growth beyond that forecasted by SCAG. Considering that the Housing Element Update would accommodate housing based on the population projections for the City and housing need for the City's existing population, the proposed project would potentially be consistent with the AQMP. Nonetheless, impacts related to conflicting with or obstructing implementation of applicable air quality plans under the proposed project will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*
- c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Residential construction associated with the Housing Element Update could generate criteria pollutant emissions exceeding the SCAQMD regional construction thresholds. In addition, the operation of new residential development would generate criteria emissions due to vehicle trips to and from individual projects, energy use, and area sources such as the use of landscaping equipment. Operation of the proposed project could potentially generate criteria pollutant emissions exceeding the SCAQMD regional thresholds for operation. Future individual development projects would be required to comply with regulatory requirements RCM-AQ-1 through RCM-AQ-7 to minimize emissions of criteria pollutants during construction and operation. However, further analysis is required to determine whether potentially significant impacts could occur. Therefore, potential air quality impacts due to criteria pollutant emissions will be further analyzed in an environmental impact report (EIR).

In addition, construction activities associated with project development may expose sensitive receptors in the City to substantial pollutant concentrations, such as diesel exhaust from construction equipment and particulate matter generated during grading and excavation activities. As such, potential air quality impacts of the proposed project on sensitive receptors will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The occurrence and severity of potential odor impacts depends on a number of factors, including the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the receiving location, each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Construction activities for new residential development under the proposed project may produce temporary odors. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, and architectural coatings. Such odors would disperse rapidly from the individual project sites, generally occur at magnitudes that would not affect substantial numbers of people and would be limited to the construction period. Furthermore, construction would be required to comply with RCM-AQ-5 (Odor-Reducing Equipment) noted above and SCAQMD Rule 402, which regulates nuisance odors. Accordingly, the construction of future development under the proposed project is not anticipated to create objectionable odors affecting a substantial number of people and impacts would be less than significant.

SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Residential uses are not identified on this list, and, therefore, project development would not be a major source of odors and would not create objectionable odors to surrounding sensitive land uses. Potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|---|---|---|---|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ■ | □ | □ | □ |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ■ | □ | □ | □ |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | □ | □ | □ | ■ |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ■ | □ | □ | □ |

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impacts related to biological resources. However, for the purposes of providing more robust analysis and disclosure, this topic will be further discussed in the EIR.

Housing Element Update

The City has established regulatory requirements to reduce or eliminate impacts to biological resources. The following is a summary of an RCM related to biological resources that the proposed project would be subject to:

- **RCM-WQ-1 (Alteration of a State or Federal Watercourse):** The project is required to comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the applicant is required to consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance shall be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:
 - *United States Army Corps of Engineers.* The applicant is required to obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise

indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory *Division*, (805) 585-2148.

- *State Water Resources Control Board*. The applicant is required to consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6759.
 - *California Department of Fish and Wildlife*. The applicant is required to consult with the Lake and Streambed Alteration (LSA) Program and obtain a Streambed Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSA Program, 3883 Ruffin Road, San Diego, CA 92123, (858) 636-3160.
- a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Special Status Species

Special status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the United States Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act (FESA); those considered “Species of Concern” by the USFWS; those listed or candidates for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA); animals designated as “Fully Protected” by the California Fish and Game Code (CFGC); animals listed as “Species of Special Concern” (SSC) by the CDFW; CDFW Special Plants, in the CNPS’s Inventory of Rare and Endangered Vascular Plants of California (CNPS 2020); and birds identified as sensitive or watch list species by the Los Angeles County Sensitive Bird Species Working Group (2009).

The City of Los Angeles’ 478 square miles are surrounded by the San Gabriel Mountains to the north, the Santa Susana Mountains, Santa Monica Mountains, and Pacific Ocean to the west, the Pacific Ocean to the South, and the Verdugo Mountains, San Rafael Hills, and San Gabriel Valley to the east. While approximately 214 of 478 square miles in the City are comprised of hills and mountains that provide habitat for wildlife, urbanization has substantially reduced the abundance and diversity of biological resources in Los Angeles. The largest collection of publicly owned natural habitats in the City are the parks and publicly owned open spaces in the San Gabriel, Santa Monica, Verdugo, and Santa Susana Mountains (City of Los Angeles 2001). Remaining native habitat that could support special status species is largely limited to these open space areas in the northern portion of the City, isolated portions of the coast, and limited areas of the Los Angeles River. The central and southern portions of the City are highly urbanized.

The geographic distribution of development would largely occur in areas of the City that are currently zoned for multi-family and commercial development in proximity to transit (see

Figure 2-3). Special status species typically have specific habitat requirements that are lacking in highly developed and disturbed urban areas. However, it is possible that individual project development sites are also identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of native habitats or candidates, sensitive, or special status species. Therefore, impacts to such habitats and species would be potentially significant and will be further discussed in an EIR.

Nesting Birds

While common birds are not designated as special status species, destruction of the eggs, nests, and nestlings of any bird (except English sparrows [*Passer domesticus*] and European starlings [*Sturnus vulgaris*]) is prohibited by federal and State law. Sections 3503 and 3513 of the California Fish and Game Code (CFGF) prohibit the taking of specific birds, their nests, eggs, or any portion thereof during the nesting season. Section 3503.5 of the CFGF specifically protects birds of prey, and their nests and eggs, against take, possession, or destruction. Section 3513 of the CFGF incorporates restrictions imposed by the federal Migratory Bird Treaty Act (MBTA) with respect to migratory birds, prohibiting the take or possession of any migratory nongame bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by CDFW.

While the Housing Element Update would not require the construction of new development, the proposed project could allow for the development of new housing, construction for which could occur during the bird nesting season, which is generally from March 1 through August 31 and begins as early as February 1 for raptors. In addition, future Rezoned Sites could be identified within existing developed areas of the City that include vegetation and trees that could support bird nesting. As such, potential construction impacts resulting in vegetation trimming or removal during the nesting season would have the potential to disturb active nests, either directly (e.g., injury, mortality, or disruption of normal nesting behaviors) or indirectly (e.g., construction noise, dust, and vibration from equipment). Such disturbance could constitute a violation of the CFGF and/or MBTA. Therefore, impacts to active bird nests would be potentially significant and will be further discussed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Plant communities are considered sensitive biological resources if they have limited distributions, high wildlife value, include sensitive species, or are particularly susceptible to disturbance. CDFW maintains a list of sensitive plant communities (CDFW 2019). Riparian habitats in the City include the Los Angeles River and its tributaries, including the Pacoima Wash, Tujunga Wash, and Verdugo Wash. While most of the Los Angeles River corridor is of extremely poor habitat quality, especially in areas where the river channel is completely lined with concrete, a narrow band of willow riparian habitat is located along the bed of the Los

Angeles River in two areas: 1) near the Interstate 5/State Route 134 (I-5/SR-134) interchange, and 2) downstream of Colorado Boulevard. This permanently wet, partially-submerged habitat has a canopy of mid-sized willows and a dense understory of reeds and non-native weeds. Natural communities along the river include the Southern Willow Scrub, Southern Mixed Riparian Forest, and Southern Cottonwood-Willow Riparian Forest. Other areas in the City that presently support riparian habitat include the Sepulveda Basin, Glendale Narrows. The 225-acre Sepulveda Basin Wildlife Preserve is the only officially designated wildlife area along the river in the City. Key indicator species found within these areas include a variety of mammals and birds, such as coyote, shrike, acorn woodpeckers, and California quail (City of Los Angeles 2017). In addition, most of the Santa Monica Mountains east of U.S. Route 101 (U.S. 101), including Griffith Park, is part of the Griffith Park Significant Ecological Areas (SEA), which has the potential to support sensitive natural communities and riparian vegetation.

It is possible that sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites with proximity to riparian habitat or other sensitive natural community. As such, impacts to sensitive natural communities or riparian habitats would be potentially significant and will be further discussed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

In accordance with Section 1602 of the CFGC, the CDFW has jurisdiction over lakes and streambeds (including adjacent riparian resources). CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake. Under Section 404 of the Clean Water Act (CWA), the United States Army Corps of Engineers (USACE) has authority to regulate activities that discharge dredge or fill material into wetlands or other “waters of the United States” through issuance of a Section 404 Permit. Finally, the Regional Water Quality Control Board (RWQCB) has jurisdiction over “waters of the state” pursuant to the Porter-Cologne Water Quality Control Act and has the responsibility for review of the project water quality certification per Section 401 of the federal CWA.

Wetlands in the City are associated with springs, streams, rivers (e.g., Tujunga Wash) and lakes, as well as the ocean (City of Los Angeles 2001). The largest coastal wetland, Ballona Wetlands, is in the Westchester-Playa del Rey community (City of Los Angeles 2001). The Ballona Wetlands is an identified Significant Ecological Area (SEA) that provides approximately 153 acres of wetland habitat and 83 acres of non-wetland waters (CDFW 2017). The Ballona Wetlands provides a variety of habitat types and is home to a variety of wildlife and plant species (CDFW 2017). The Venice Canal System, in the Venice community, is also an important part of the wetlands system as its canals connect to the Pacific Ocean (City of Los Angeles 2001). Furthermore, the soft-bottomed portion of the Los Angeles River provides

wetland habitat, though it too is degraded in many areas and dominated by non-native plant communities.

The Housing Element Update would prioritize development along commercial corridors and existing residential neighborhoods located in proximity to existing public infrastructure and would not directly or indirectly result in the direct modification of wetlands or jurisdictional waters. Nonetheless, any future projects would be required to comply with RCM RC-WQ-1 (Alteration of a State or Federal Watercourse) to ensure that impacts to jurisdictional waters and wetlands would be less than significant. In addition, the City's Stormwater and Urban Runoff Pollution Control Ordinance would require future development to comply with the City's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, including the inclusion of best management practices (BMPs) in a project's design to prevent, control, and reduce stormwater pollutants, if applicable; integrate LID practices and standards for stormwater pollution mitigation; and maximize open, green, and pervious space on all development consistent with the City's landscape ordinance and other related requirements. Such compliance of future development would ensure that construction does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality of wetlands or other jurisdictional waters. As a result, implementation of the Housing Element Update would have a less than significant impact on State or federally-protected wetlands.

LESS THAN SIGNIFICANT IMPACT

- d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

Habitat fragmentation occurs when a proposed action results in a single, unified habitat area being divided into two or more areas in such a way that the division isolates the two new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another, as in the fragmentation of habitats within and around "checkerboard" residential development. Habitat fragmentation also can occur when a portion of one or more habitats is converted into another habitat, as when annual burning converts scrub habitats to grassland habitats.

In Los Angeles, landscapes that contribute to wildlife corridors and/or nursery sites are concentrated primarily in large, contiguous open space areas with native habitats such as those located in the surrounding mountains: San Gabriel, Santa Monica, Verdugo, and Santa Susana Mountains. Those wildlife corridors on the borders of the City link to regional corridors, including the Angeles National Forest to the north and Topanga State Park to the west (Los Angeles County 2009). Local wildlife movement may occur along watercourses, such as the Los Angeles River; though such movement would likely be limited given the channelized nature of much of the river and its urban surroundings. Limited wildlife movement could also occur along uninterrupted areas of coastline in the City. Otherwise, because much of Los Angeles is either urban or suburban in nature, wildlife corridors and nursery sites are not present in much of the City.

Project development would largely occur in areas of the City that are currently zoned for multi-family and commercial development in proximity to transit. The encouragement of dense development on infill sites near transit hubs and corridors under the proposed project would not result in impacts to potential local wildlife movement along watercourses, such as the Los Angeles River, or on the coastline. However, it is possible that individual development sites are also located in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential or hillside sites in the vicinity of native habitats and potential wildlife corridors. Therefore, impacts to wildlife movements or established migratory corridors would be potentially significant and will be further discussed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

City of Los Angeles General Plan

The Framework Element is intended to guide the City's long-range growth and development. Chapter 6, *Open Space and Conservation*, of the Framework Element includes goals, objectives, and policies for the provision, management, and conservation of the City's open space resources, including SEAs, wildlife corridors, and natural animal ranges. The General Plan Conservation Element addresses endangered species, habitats, wildlife corridors, and wetlands occurring in the City and identifies policies intended to protect, restore, and enhance these biological resources (City of Los Angeles 2001). Furthermore, future development projects would be required to comply with zoning and overlays that implement General Plan goals and policies, as well as specific plan or community plan development regulations, intended to protect biological resources, such as trees. Therefore, the Housing Element Update would be consistent with the goals and policies of the General Plan regarding sensitive biological resources and impacts would be less than significant.

Protected Trees and Heritage Trees

According to Articles 2 and 7 of Chapter I, Article 6 of Chapter IV, and Section 96.303.5 of the LAMC and City Ordinance No. 177404 (Protected Tree Ordinance, City of Los Angeles 2006b), any of the following southern California native tree species measuring four inches or more in diameter at breast height (DBH; cumulative total for multi-trunks) is considered a protected tree species within City limits: valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), or any other *Quercus* sp. tree indigenous to California, except for scrub oak (*Quercus dumosa*); southern California black walnut (*Juglans californica* var. *californica*); western sycamore (*Platanus racemosa*); and California bay (*Umbellularia californica*). Blue elderberry (*Sambucus nigra* ssp. *caerulea*) and toyon (*Heteromeles arbutifolia*) are proposed to be added to the protected trees list, but such an amendment has not yet been formally adopted by the Los Angeles City Council (City of Los Angeles 2018a).

Heritage trees are individual trees of any size or species that are specially designated by the Los Angeles Department of Recreation and Parks (DRP) as “heritage” because of their historical, commemorative, or horticultural significance. The nomination and determination of heritage trees is an internal process within DRP. Nominations are generally made by DRP staff members or community members. The City of Los Angeles maintains an inventory of heritage trees that the City intends to maintain and preserve on City properties, including parks. Heritage trees are not required to be one of the protected tree types covered by the Protected Tree Ordinance. The list of heritage trees can be viewed on NavigateLA on the City’s DRP website. Because heritage trees are located on City parks and recreational facilities, as well as in public rights-of-way, DRP is responsible for the maintenance and protection of these trees from injury. The list of heritage trees remains open for new designations and provides information to DRP staff regarding the importance of their actions while planning activities near heritage trees.

Heritage trees can be found on a number of City parks and protected tree species may be found on individual public or private properties throughout the City. Future development resulting from the implementation of the Housing Element Update is not expected to affect heritage trees since these trees are located on public property and DRP is responsible for their maintenance and protection from injury.

Some protected trees may be located on private property where development of new housing units could occur. The City’s Protected Tree Ordinance makes it illegal to relocate, remove, or fatally harm protected trees without the issuance of a permit by the Los Angeles Department of Public Works (DPW) prior to development. In the event that the LADPW approves removal of a protected tree, replacement of the tree would be required. The current City of Los Angeles Urban Forestry Division policy requires, at a minimum, protected tree replacement at a four to one ratio.

Local Coastal Programs

Venice Coastal Zone Specific Plan

The City of Los Angeles does not have a certified Local Coastal Program for the Venice community, but the City has adopted the Venice Coastal Zone Specific Plan. This Specific Plan consists of land use plans, zoning ordinances, zoning district maps, and other implementing actions intended to implement the provisions and policies of the California Coastal Act at the local level. The Specific Plan is predominantly a land use plan, but it also addresses water and marine resource issues relating to regulation of storm water runoff, tidal circulation, and protection and enhancement of environmentally sensitive habitat areas within the Venice Coastal Zone (City of Los Angeles 1999).

San Pedro Local Coastal Program

The City of Los Angeles does not have a certified Local Coastal Program for the San Pedro community, but the City has adopted the San Pedro Coastal Land Use Plan and the San Pedro Specific Plan. The San Pedro Specific Plan and the San Pedro Coastal Land Use Plan contain land use and development regulations to protect, maintain, enhance, and restore the overall quality of the San Pedro Coastal Zone while meeting provisions of the California Coastal Act (City of Los Angeles 2013).

The Housing Element Update does not include any components that would preclude implementation of or alter the above-described policies, plans, or procedures. Thus, implementation of the Housing Element Update would not conflict with any local policies or ordinances protecting biological resources, including protected trees. Impacts related to local policies or ordinances protecting biological resources would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The Natural Community Conservation Act (NCCA) (CFG Chapter 10, Division 3, Sections 2800 et seq.) was enacted in 1991. The NCCA is administered by CDFW. The goal of this Act is to identify and secure habitat areas for protection of biodiversity. Habitat areas are identified by CDFW, and plans are prepared for habitat protection. When a development project is proposed, a determination is made concerning the potential impacts of the project on biodiversity and the best means of avoiding or mitigating them. NCCA allows local, State or federal agencies to enter into agreements with public and private entities to implement a "natural community conservation plan" (NCCP), e.g., habitat and species protection within a specified geographic area. Participation in an NCCP does not exempt a development project from CEQA. Mitigation measures pursuant to CEQA may, as an alternative, include participation in an NCCP in order to reduce the burden for on-site mitigation.

Habitat Conservation Plans (HCPs), designated under the FESA Section 10(a)(1)(B), are federal planning documents designed to conserve the ecosystems upon which listed species depend, ultimately contributing to their recovery. HCPs require a “take permit” when a project will affect a species identified as listed, non-listed or eligible under the act and detail how those impacts will be minimized or mitigated; and how the HCP is to be funded (USFWS 2020). No HCPs or NCCPs apply to the City (City of Los Angeles 2015a). Therefore, no impact would occur.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to cultural resources.

Housing Element Update

CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (PRC Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). Tribal cultural resources are discussed in Section 18, *Tribal Cultural Resources*, of this Initial Study.

A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (State CEQA Guidelines, Section 15064.5[a][1-3]). A resource shall be considered historically significant if it:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, CEQA recommends that the lead agency require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state to avoid a significant impact. To the extent that resources cannot be left undisturbed, additional or alternative mitigation measures should be required (PRC, Section 21083.2[a], [b]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The City has established regulatory requirements for the treatment of cultural resources. The following are summaries of RCMs related to cultural resources that the proposed project would be subject to:

- **RCM-CR-1 (Permits for Historical and Cultural Buildings):** The project is required to comply with all applicable standards of LAMC Section 91.106.4.5 which provides procedures for the demolition, alteration, or removal of buildings or structures of historical, archaeological, or architectural consequence, including environmental review and permitting requirements for structures designated by local action or designated or identified as historical by State or federal action.
- **RCM-CR-2 (Human Remains):** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance is to occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98 for Native American human remains if necessary. In the event that human remains are discovered during excavation activities, the following procedures would be observed:

- Stop immediately and contact the County Coroner:

1104 N. Mission Road

Los Angeles, CA 90033

323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or

323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
 - If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.
- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Survey LA, the Los Angeles Historic Resources Survey, serves as the primary planning tool for identifying, recording, and evaluating historical resources, whether individual resources or potential districts, in the City. Field surveys conducted from 2010 through 2017 covered the entire City across over 880,000 legal parcels in an area of almost 500 square miles. The survey identified approximately 25,000 resources, including 29 Los Angeles Historic Preservation Overlay Zones, 430 historic districts, 1,065 L.A. Historic Cultural Monuments and 300 places designated by the National Register of Historic Places (Office of Historic Resources 2020). The Housing Element Update and Rezoning Program would prioritize the development of new housing on infill sites in areas with existing public transit infrastructure. Some of these infill sites may contain potential historical resources, including those identified by Survey LA as potentially eligible for listing in the CRHR, or resources already designated as an Historical Cultural Monument or in an HPOZ, or designated on the State register, the demolition or alteration of which could constitute a significant impact, even with compliance with RCM-CR-1. Therefore, project development has the potential to impact historical resources and this issue will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

The Housing Element and Rezoning Program would prioritize the development of new housing along transit corridors in areas with existing public transit infrastructure and in areas have previously been developed and disturbed. Therefore, on future development sites under the proposed project, it is likely that prior grading, construction, and modern use of the sites would have either removed or destroyed archaeological resources within surficial soils. Nonetheless, there is the potential for archaeological resources to exist below the ground surface throughout the City, which could be disturbed by grading and excavation activities associated with new housing development. Therefore, project development has the potential to impact archaeological resources and this issue will be discussed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

RCM-CR-2 (Human Remains) recognizes the requirements of California Health and Safety Code, Section 7050.5; which mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. If human remains are found during project construction, existing regulations outlined in the State of California Health and Safety Code Section 7050.5 state that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified within 24 hours of identification as human. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner. Any soil disturbing activities from project development would be required to adhere to existing laws regarding the discovery of humans, which would minimize potential impacts to human remains, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to energy.

Housing Element Update

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate. In 2018, California consumed 681 million barrels of petroleum, 2,137 billion cubic feet of natural gas, and one million short tons of coal in 2018 (United States Energy Information Administration [EIA] 2020). The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent) (EIA 2020).

Most of California's electricity is generated in-state with approximately 30 percent imported from the northwest and southwest in 2018. In addition, approximately 30 percent of California's electricity supply comes from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (California Energy Commission 2019). Adopted on September 10, 2018, Senate Bill (SB) 100 accelerates the State's Renewables Portfolio Standards Program by requiring electricity providers to increase procurement from eligible renewable

energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with 15.6 billion gallons sold in 2018 and is used by light-duty cars, pickup trucks, and sport utility vehicles (California Department of Tax and Fee Administration 2019). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (California Energy Commission 2016).

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units to meet the City's RHNA. Based on the City's existing growth strategy, most development sites are likely to be identified along commercial corridors and existing multi-family neighborhoods located already served by energy providers. Nonetheless, project development would consume energy during construction and operation through the use of petroleum fuel, natural gas, and electricity, as further addressed below.

Construction

Energy use during construction associated with project development would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. In addition, construction contractors would be required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities associated with project development would be required to utilize fuel-efficient equipment consistent with State and federal regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, individual projects would be required to comply with construction waste management practices to divert construction and demolition debris, pursuant to the Citywide Construction and Demolition Waste Recycling Ordinance.

These practices would result in efficient use of energy during construction of future development under the proposed project. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, future construction activities associated with project development would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Operation

Project development would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. As previously discussed, the Housing Element Update would prioritize new development in urban portions of the City that are already served by energy providers. Electricity service in the City is provided by the Los Angeles Department of Water and Power (LADWP) and Southern California Edison (SCE). Southern California Gas Company (SoCal Gas) provides natural gas services to residents and businesses in the City.

Project development would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations), and the Los Angeles Green Building Code (LAMC Chapter IX, Article 9). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. New developments would also be required to comply with the Los Angeles Green Building Code, which contains mandatory measures for residential and non-residential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems).

In addition, the Housing Element Update would prioritize developing new housing units in close proximity to high quality transit areas and existing commercial/retail, recreational, and institutional land uses, which would reduce trip distances and encourage the use of alternative modes of transportation such as bicycling and walking. These factors would minimize the potential of the proposed project to result in the wasteful or unnecessary

consumption of vehicle fuels. As a result, operation of project development would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The City of Los Angeles adopted Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (Green LA), in May 2007 (City of Los Angeles 2007). Green LA set the goal of reducing the City's GHG emissions to 35 percent below 1990 levels by 2030. The emphasis of Green LA is on municipal facilities and operations followed by programs to reduce emissions in the community. To facilitate implementation of Green LA, the City adopted the Los Angeles Green Building Code, which future developments in accordance with the Housing Element Update would be required to implement. Green LA is also being implemented through Climate LA, which provides detailed information about each action item discussed in the Green LA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in buildings to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption.

In addition, LADWP will continue to implement programs to emphasize water conservation and pursue procurements of alternative local water supplies, including recycled water and storm water capture, which would reduce energy consumed by treating and transporting water. Furthermore, the City implemented the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) plan to meet solid waste reduction goals by expanding recycling to multi-family dwellings, commercial establishments, and restaurants (City of Los Angeles 2006). Under the RENEW LA Plan, the City is developing facilities to convert solid waste to energy without incineration. These measures would collectively serve to increase energy efficiency and reduce overall energy use in the City.

On April 8, 2015, Los Angeles released the Sustainable City pLAN, which covers a multitude of environmental, social, and economic sustainability issues related to GHG emissions reductions, either specifically or by association (City of Los Angeles 2015b). In 2019, the City prepared the L.A. Green New Deal/2019 Sustainability Plan, which provides an expanded vision of the Sustainable City pLAN, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the L.A. Green New Deal/2019 Sustainability Plan, the City would reduce an additional 30 percent in GHG emissions above and beyond the 2015 pLAN and ensures that the City stays within its carbon budget between 2020 and 2050 (City of Los Angeles 2019). In addition, the proposed project's emphasis on infill development in areas with access to jobs and high-quality public transit is consistent with applicable strategies for reducing VMT and vehicle fuel consumption from the SCAG 2020 RTP/SCS (SCAG 2020a). Facilitating housing development in proximity to transit and

job centers along, with regulatory compliance, would ensure that the proposed project would not conflict with renewable energy and energy efficiency plans adopted by the City. As such, the project would not conflict with or obstruct a plan for renewable energy or energy efficiency, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to geology and soils.

Housing Element Update

The City has extensive and comprehensive regulations to avoid geologic hazards and soil management during construction of projects. Project development would be subject to the following RCMs relevant to geology and soils:

- **RCM-GEO-1 (Seismic):** The design and construction of development are required to conform to the California Building Code (CBC) seismic standards as approved by the Department of Building and Safety.
- **RCM-GEO-2 (Hillside Grading Area):** Grading plans are required to conform with the City's Landform Grading Manual guidelines, subject to approval by the Advisory Agency and the Department of Building and Safety's Grading Division. Appropriate erosion control and drainage devices are required to be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.
- **RCM-GEO-3 (Landslide Area):** Prior to the issuance of grading or building permits, applicants are required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for

review and approval. The geotechnical report needs to assess potential consequences of any landslide and soil displacement, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations are required to include at minimum:

- ground stabilization
 - selection of appropriate foundation type and depths
 - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures
 - Developments are required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for a development, and as it may be subsequently amended or modified.
- **RCM-GEO-4 (Liquefaction Area):** Developments are required to comply with the Uniform Building Code (UBC) Chapter 18. Division 1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. Prior to the issuance of grading or building permits, the applicant is required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report needs to assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:
 - ground stabilization
 - selection of appropriate foundation type and depths
 - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.
 - Developments are required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.
- **RCM-GEO-5 (Subsidence Area):** Prior to the issuance of building or grading permits, the applicant is required to submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The geotechnical report needs to assess potential consequences of any subsidence and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations need to include, but are not limited to, ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. Development is required to comply with the conditions contained within the Department of Building and Safety's Geology

and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- **RCM-GEO-6 (Expansive Soils Area):** Prior to the issuance of grading or building permits, the applicant is required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report needs to assess potential consequences of any soil expansion and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations need to include, but are not limited to, ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. Developments are required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for each project development and as it may be subsequently amended or modified.
- **RCM-GEO-7 (Low Impact Development):** Developments are required to comply with the applicable provisions of the City's Low Impact Development (LID) Ordinance (Ordinance No. 181899, updated September 2015) and LID Handbook for the purpose of improving water quality by minimizing urban runoff and soil erosion.
- **RCM-GEO-8 (Grading, Excavations, and Fills):** Developments are required to comply with the applicable provisions of LAMC Chapter IX, Division 70, which established the requirements for a grading permit from the Department of Building and Safety. Grading permits require all projects to implement BMPs during grading and excavation to reduce soil erosion during construction.

a.1. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

a.2. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

The City is located in a seismically active region of southern California. Major active faults in the area include the San Andreas, Whittier-Elsinore, Newport-Inglewood, Hollywood, and Raymond Fault zones. In addition to these known faults, movement along buried blind thrust faults that have no obvious surface features can also occur, such as during the Northridge earthquake (City of Los Angeles 1996). According to the DOC Earthquake Zones of Required Investigation map, the City contains areas at risk of seismically induced liquefaction, as well as hillsides around the Santa Monica Mountains subject to landslide (DOC 2020a). Furthermore, in a letter received by the City from the DOC's California Geological Survey (CGS) on July 16, 2020, the DOC CGS provided details regarding emerging scientific information for the Hollywood Fault (DOC 2020b). A May 8, 2020 analysis by the United States Geological Survey (USGS) in which multiple seismic datasets and models strongly

suggest active, near-surface fault traces of the Hollywood Fault not previously mapped by the DOC's CGS in the 2014 Hollywood Earthquake Fault Zone Map. Therefore, project development could occur in areas with the potential for fault rupture and seismic ground shaking, and associated risk of loss, injury, or death; however, potential projects would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas that could create unstable seismic conditions or stresses in the Earth's crust. As such, the proposed project would not directly or indirectly cause or increase potential substantial adverse effects involving the rupture of a known earthquake fault or strong seismic ground shaking.

The proposed project would involve new construction, potentially including larger, taller buildings and more dense development that could experience substantial damage during seismic ground shaking events. However, before a project can be permitted within a mapped Alquist-Priolo Earthquake Fault Zone, the City requires completion of a geologic investigation that demonstrates proposed buildings for human occupancy would not be constructed on or within 50 feet of an active fault trace. Future project development would also be subject to RCM-GEO-1 through RCM-GEO-6, as well as federal, State, and local regulations in place for the purpose of mitigating seismic risks.

As required by Chapter 16 of the CBC, for the construction of new buildings or structures, specific engineering design and construction measures would be implemented to minimize the potential for adverse impacts to human life and property caused by seismically induced ground shaking or fault rupture. Chapter 33 of the CBC requires all new development to comply with specific geologic design parameters and geotechnical recommendations, which would be incorporated into individual development projects to minimize the potential for adverse impacts. In addition, Policy 1.1.6 of the Safety Element of the City General Plan encourages development to comply with applicable State and federal planning and development regulations, including the Alquist-Priolo Earthquake Fault Zoning Act and the Seismic Hazards Mapping Act. Compliance with applicable regulations and policies would foreseeably minimize the risk of exposure to hazards associated with fault rupture and seismic ground shaking and project development would not increase the potential for fault rupture or ground shaking. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

Project development would be subject to RCM-GEO-4 (Liquefaction Area), which requires applicants to submit a geotechnical investigation to determine the potential for liquefaction

on a project site. Developments would be required to comply with current engineering practices as reflected in the City of Los Angeles Building Code (Chapter IX), the IBC, and the CBC. The IBC and CBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of any adverse soil conditions. UBC Chapter 18 Division 1 Section 1804.5 requires the submittal of a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Los Angeles Department of Building and Safety (LADBS), for review and approval.

The required geotechnical investigation must assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. Compliance with City and State building codes would reduce seismic ground shaking impacts with current engineering practices and the project would not exacerbate liquefaction potential in the area. As such, the proposed project would not directly or indirectly cause substantial adverse effects from liquefaction risk and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. Areas of the City in landslide hazard zones are concentrated near the hillsides of the Santa Monica Mountains, in low-density residential areas (DOC 2020c). The Housing Element Update would emphasize growth in urban areas of the City, away from existing low-density residential areas subject to seismically induced landslides. Nonetheless, any excavations associated with project development would be required to be sloped or properly shored in accordance with the applicable provisions of the City of Los Angeles Building Code and if development did occur in a landslide area, those projects would be subject to the regulations described in RCM-GEO-3 (Landslide Area). Therefore, project development would not directly or indirectly cause substantial adverse effects resulting from landslides and potential impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. *Would the project result in substantial soil erosion or the loss of topsoil?*

Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils, resulting in their transport offsite. The Housing Element Update emphasizes the development of new housing units on previously disturbed, infill areas. Because the Housing Element Update would prioritize new housing in areas that are already built out, the potential for erosion would primarily be limited to temporary effects of possible topsoil loss at future project construction sites.

Ground-disturbing activities associated with the construction of Project development would have the potential to result in the removal and erosion of topsoil during grading and excavation. For construction activities, Section D of LAMC Article 4.4, *Stormwater and Urban Runoff Pollution Control*, requires owners or developers to implement stormwater pollution control requirements for construction activities depicted in the project plans, which are subject to approval by the Department of Building and Safety. The BMPs would be in accordance with the provisions contained in the "Planning and Land Development Handbook For Low Impact Development (LID), Part B Planning Activities" and would be designed to capture and treat runoff from construction sites such as through stabilization of construction entrance roadways and on-site retention of eroded sediments and pollutants. In addition, projects would be subject to the regulations described in RCM-GEO-7 and RCM-GEO-8, which include requirements to minimize potential adverse impacts associated with water quality and soil erosion. Construction activities would also be required to comply with CBC Chapter 70 standards, which are designed to ensure implementation of appropriate measures during grading and construction to control erosion and storm water pollution.

Construction activities that disturb one or more acres of land are subject to the National Pollutant Discharge Elimination System (NPDES) General Construction Permit process, which would require development of a Stormwater Pollution Prevention Plan (SWPPP) that outlines project-specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants from construction into stormwater. Typical BMPs include, but are not limited to, installation of silt fences, erosion control blankets, and anti-tracking pads at site exits to prevent off-site transport of soil material. Therefore, erosion from demolition and construction activities associated with project development would be controlled through implementation of the requirements and BMPs contained in existing regulations, including the NPDES Construction General Permit and LAMC. Furthermore, BMPs for post-construction erosion and sediment control would remain in effect, which would improve future erosion conditions. Compliance with the regulations discussed above would reduce the risk of soil erosion from construction activities such that there would be minimal change in risk compared to current conditions with existing development and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

Impacts related to landslides and liquefaction are addressed under impact discussions *a.3.* and *a.4.*; therefore, this discussion focuses on impacts related to unstable soils as a result of lateral spreading, subsidence or collapse. Lateral spreading occurs as a result of liquefaction; accordingly, liquefaction-prone areas would also be susceptible to lateral spreading. Subsidence occurs at great depths below the surface when subsurface pressure is reduced by the withdrawal of fluids (e.g. groundwater, natural gas, or oil) resulting in sinking of the ground. The City of Los Angeles may be susceptible to subsidence from groundwater withdrawal as a result of drought conditions and declining groundwater levels.

The Housing Element Update would prioritize development of housing on infill sites in dense urban areas which may contain underlying unstable soils. Because project development would primarily involve infill development, development under the proposed project would not affect existing conditions related to unstable soils, unless improperly constructed. Nonetheless, all future project development would be required to comply with the CBC's minimum standards for structural design and site development, including those described in RCM-GEO-1 (Seismic). The CBC provides standards for excavation, grading, and earthwork construction; fills and embankments; expansive soils; foundation investigations; and liquefaction potential and soils strength loss. Therefore, CBC-required incorporation of soil treatment programs (replacement, grouting, compaction, drainage control, etc.) in the excavation and construction plans can achieve an acceptable degree of soil stability to address site-specific soil conditions. In addition, future projects would be required to comply with the regulations described in RCM-GEO-2 through RCM-GEO-6, which provide safety measures to address geologic hazards, as applicable. Adherence to these requirements would achieve accepted safety standards relative to unstable geologic units or soils. In addition, although project development would potentially be subject to these hazards, it would not increase the potential for lateral spreading, subsidence, or collapse. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Soils that volumetrically increase (swell) or expand when exposed to water and contract when dry (shrink) are considered expansive soils. A soil's potential to shrink and swell depends on the amount and types of clay in the soil. Highly expansive soils can cause structural damage to foundations and roads without proper structural engineering and are generally less suitable or desirable for development than non-expansive soils because of the necessity for detailed geologic investigations and costlier grading applications.

The Housing Element Update would prioritize development of housing on infill sites in urban areas that may contain underlying expansive soils. Because project development would

primarily involve infill development, development under the proposed project would not substantially increase the potential exposure to or extent of expansive soils within the City. Furthermore, future project development be subject to LAMC regulations that require the testing of underlying soils for each individual development site for the presence of expansive soils and their remediation as necessary to reduce potential damage risk. The City of Los Angeles Building Code incorporates the CBC requirements for slab-on-ground building foundations located on expansive soils (CBC 2016). The CBC, which is based on the UBC, has been modified for California conditions with numerous more detailed and/or more stringent regulations. If expansive soils are detected based on a preliminary soil report, the CBC requires the preparation of a soil investigation prior to construction and incorporation of appropriate corrective actions to prevent structural damage, to be determined on a project-by-project basis. Individual development projects would be required to comply with regulations described in RCM-GEO-1 and RCM-GEO-6, which contain provisions for developments located on expansive soils. Therefore, there would be minimal change in the exposure of people or structures to risks associated with expansive soils and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The Los Angeles Bureau of Sanitation (LASAN) operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and business customers in a 600-square-mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to treat an average of 580 million gallons per day (mgd) of wastewater (LASAN 2020a and 2020b).

The Housing Element Update would emphasize the development of additional housing units in urban infill sites which would be served by existing LASAN infrastructure. Project development would not use septic systems. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems.

NO IMPACT

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The Housing Element Update would prioritize the development of new housing on infill sites in areas with existing public transit infrastructure and areas of the City that have previously been developed and disturbed. Nonetheless, there is the potential for paleontological resources to exist below the ground surface throughout the City. Paleontological resources have been found in many parts of the City, mostly around hillsides but also in the center parts of the City, including most famously around the La Brea Tar Pits within and surrounding

Hancock Park. Such resources could be disturbed by grading and excavation activities associated with new housing development. Therefore, project development has the potential to impact paleontological resources and this issue will be discussed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	■	□	□	□
g. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	■	□	□	□

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to GHG emissions.

Housing Element Update

The City has extensive regulatory requirements for development projects that are intended to reduce GHG emissions. These regulations summarized in the following RCMs would apply to applicable project development:

- **RCM-GHG-1 (Green Building Code):** In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), the development is required to comply with applicable mandatory provisions of the latest Los Angeles Green Code and as it may be subsequently amended or modified. The Los Angeles Green Building Code contains mandatory measures for residential and non-residential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems).
- **RCM-GHG-2 (Title 24):** Developments are required to comply with the applicable mandatory requirements of the latest Building Energy Efficiency Standards (Title 24, Parts 6 and 11), including use of high-efficiency lighting and EnergyStar appliances.

- **RCM-GHG-3 (CALGreen):** Developments are required to comply with the applicable mandatory requirements of the latest California Green Building Standards Code (CALGreen; Title 24, Part 11), including water-saving requirements such as efficient plumbing fixtures and irrigation systems.
 - **RCM-GHG-4 (Construction Waste):** Construction waste is required to be reduced by at least 50 percent. AB 939 requires diversion of 50 percent of solid waste to landfills through source reduction, recycling, and composting. The California Solid Waste Reuse and Recycling Access Act of 1991 requires adequate storage areas for collection and storage of recyclable waste materials.
 - **RCM-GHG-5 (Renewable Portfolio Standard):** Project development would use energy from SCE or the LADWP, which are required to diversify their portfolios of energy sources to increase the use of renewable energy. Per SB 100, the statewide Renewable Portfolio Standard (RPS) Program requires electricity providers to increase procurement from eligible renewable energy sources to 60 percent by 2030.
- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Assembly Bill 32, the Global Warming Solutions Act of 2006 (AB 32), requires the state to reduce GHG emissions to 1990 levels by 2020. The CARB adopted the Scoping Plan to identify state regulations and programs that would be adopted by State agencies to achieve the 1990 target of AB 32. In addition, Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008 (SB 375), was adopted by the legislature to reduce per capita VMT and associated GHG emissions from passenger vehicles. The City seeks to reduce GHG emissions throughout the community by maintaining consistency with the most directly applicable adopted regulatory plans, including, but not limited to, the 2017 Scoping Plan, the 2020 RTP/SCS (also known as *Connect SoCal*).

Project development would generate GHG emissions during construction through the use of petroleum-fueled construction equipment and worker vehicle trips to and from construction sites. Operation of developments generate GHG emissions through the use of electricity and natural gas, vehicle trips of occupants, waste generation, water use, and wastewater generation. Although project development would be required to implement RCM-GHG-1 through RCM-GHG-5, GHG emissions generated under the proposed project could potentially have a significant impact on the environment. As such, potential GHG emissions generated by project development, and the consistency of project development with applicable plans, policies, or regulations aimed at reducing such GHG emissions, will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to hazards and other risks, rather the Safety Element Update is intended to improve policies and regulations associated with hazardous materials or other risks (e.g., emergency response or evacuation plans, and wildland fires).

Housing Element Update

The City and State law have extensive and comprehensive regulatory requirements for development projects to reduce or eliminate risks related to hazardous materials. These measures summarized in the following RCMs would apply to project development:

- **RCM-HAZ-1 (Asbestos):** Pursuant to California Health and Safety Code Section 19827.5, a demolition permit is not to be issued by any city, county, city and county, or State or local agency which is authorized to issue demolition permits as to any building or other structure except upon the receipt from the permit applicant of evidence of asbestos notification to the Environmental Protection Agency or SCAQMD or if the applicant declares that notification is not applicable to the demolition project. If ACMs are found to be present, ACMs shall be abated in compliance with SCAQMD Rule 1403, as well as all other applicable State and Federal rules and regulations.
- **RCM-HAZ-2 (Lead-Based Paint):** Should lead-based paint materials be identified in any buildings proposed for demolition or alteration, standard handling and disposal practices shall be conducted in compliance with California and Federal Occupational Safety and

Health Administration (OSHA) and SCAQMD requirements. Only lead-based paint trained and certified abatement personnel are allowed to perform abatement activities onsite. All lead-based paint removed from onsite structures are to be hauled and disposed of by a transportation company certified to handle hazardous or regulated waste.

- **RCM-HAZ-3 (Polychlorinated Biphenyl):** Should polychlorinated biphenyls (PCBs) be identified in any buildings proposed for demolition or alteration, a qualified abatement contractor needs to conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.
- **RCM-HAZ-4: Explosion/Release (Methane Zone):** For a project site within a methane zone, prior to the issuance of a building permit, the site is required to be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the project applicant. The engineer is required to investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the building. The project applicant is required to implement the engineer's design recommendations subject to Los Angeles Department of Building and Safety (LADBS) and Los Angeles Fire Department (LAFD) plan review and approval.
- **RCM-HAZ-5 (Soil Gases):** During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures are to be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.
- **RCM-HAZ-6 (Removal of Underground Storage Tanks):** Underground Storage Tanks (USTs) are required to be decommissioned or removed as determined by the LAFD UST Division. If any contamination is found, further remediation measures would be developed with the assistance of the LAFD and other appropriate State agencies. Prior to issuance of a use of land or building permit, a letter certifying that remediation is complete from the appropriate agency (Department of Toxic Substance Control or the Regional Water Quality Control Board) is required for submission to the decision maker.
- **RCM-HAZ-7 (Hazardous and Contaminated Materials):** If hazardous or contaminated materials are encountered during construction or geotechnical exploration, the project applicant needs to contact the LAFD. The LAFD may provide oversight of remediation or refer the case to the appropriate County, State, or Federal agency depending on site specific conditions to ensure that all applicable regulatory requirements are adhered to.

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The Housing Element Update would prioritize the development of new housing on urban infill sites with access to jobs and public transit infrastructure. Construction associated with project development would involve the use of potentially hazardous materials, such as vehicle fuels and fluids, that could be released should a leak or spill occur. However, contractors would be required to implement standard construction BMPs for the use and

handling of such materials to avoid or reduce the potential for such conditions to occur. Any use of potentially hazardous materials during construction of future development in accordance with the proposed project would be required to comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials. Likewise, the transport, use, and storage of hazardous materials during future construction would be required to comply with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22.

Housing is not a land use typically associated with the use, transportation, storage, or generation of significant quantities of hazardous materials. Operation of project development would likely involve an incremental increase in the use of common household hazardous materials, such as cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in regular property and landscaping maintenance. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. Therefore, upon compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, potential impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of project development would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

As discussed under impact discussion *a.* of this section, the transport, use, and storage of hazardous materials during the construction of future housing under the proposed project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. In addition, the potential for future construction of project development to involve the demolition or alteration of structures that may contain asbestos and/or lead-based paint (LBP), would be reduced through compliance with existing regulations, including SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) which requires the owner or operator of any demolition or renovation activity to complete a facility survey for the presence of asbestos prior to any demolition or renovation activity and federal and state regulations related to lead and PCBs (see e.g., Title 40 of the CFR and Title 22 of the CCR). The Housing Element Update would emphasize development on infill sites within urban areas, where there is the potential for future development to occur on project sites where hazardous materials were once used or stored and have the potential to contain contaminated soils, the disturbance of which could pose hazards to receptors at adjacent land uses. Future construction projects would be required to comply with the regulations in RCMs HAZ-1 through HAZ-7 to minimize the potential impacts of existing hazardous materials on project

sites. Nonetheless, impacts related to the release of hazardous materials from soil contamination would be potentially significant and will be studied further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The Los Angeles Unified School District operates 705 public and charter schools in the City (City of Los Angeles 2016). Private schools, preschools, and other charter academies are also spread throughout in the City. As discussed under impact discussion *b.* of this section, project development may involve construction activities on sites that may contain contaminated soils, which could pose hazards to nearby schools in the case of an accidental release. Future construction projects would be required to comply with the regulations described in RCM-HAZ-1 through RCM-HAZ-7 to minimize the potential impacts of existing hazardous materials on project sites. However, the proposed project could potentially impact schools and this issue will be addressed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The Housing Element Update, and Rezoning Program, may involve the alteration, intensification, and redistribution of land uses. Project development could occur on hazardous materials sites. As required by RCM-HAZ-6 (Removal of Underground Storage Tanks) and RCM-HAZ-7 (Hazardous and Contaminated Sites), sites that are identified as being contaminated by hazardous substances or containing underground storage tanks and/or generators of hazardous waste are required to undergo remediation and cleanup pursuant to regulations under the California Department of Toxic Substances Control (DTSC) and the Los Angeles Regional Water Quality Control Board (LARWQCB) before construction activities can begin. Furthermore, if any future development project were to exceed regulatory action contamination levels, the project applicant would be required to undertake remediation procedures under the supervision of the County Environmental Health Division, DTSC, or LARWQCB, depending on the nature of the contaminants. Nonetheless, construction of Project development could lead to a significant hazard to the public or environment by exposing future residents to potential contamination if not properly identified. Therefore, this impact will be further discussed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

There are several airports in the City of Los Angeles or its vicinity, including the Los Angeles International Airport, Santa Monica Municipal Airport, Van Nuys Airport, Hollywood Burbank Airport, Long Beach Airport, San Gabriel Valley Airport, and Hawthorne Municipal Airport. To prevent the creation of airport hazard zones, restrictions are placed on development in the immediate vicinity of airport runways where take-off and final approach maneuvers occur. The Los Angeles County Airport Land Use Commission (ALUC) is responsible for implementing airport land use plans that promote compatibility between each airport in the county and the surrounding land uses to ensure that hazardous conditions are not created (ALUC 2020). The Housing Element Update would not contain policies that would conflict with the airport land use plans established by ALUC, nor would it emphasize building housing in the immediate vicinity of airports. If project development were proposed within two miles of an airport or within an airport influence area, it would be required to comply with applicable regulations and standards. This includes, but is not limited to, the 2019 CBC Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations, interior noise levels attributable to exterior sources shall not exceed 45 CNEL in any habitable room. While residents of project developments may be subject to occasional overhead flight noise, the proposed project would not lead to excessive noise or safety hazards as it relates to airports. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The City of Los Angeles Emergency Management Department (EMD) is comprised of four divisions and two units: the administrative services division, communications division, community emergency management division, operations division, planning unit, and training exercise unit. EMD partners with City departments, municipalities, and local organizations to provide resources and information to help residents prepare for, respond to, and recover from disasters. Within the EMD, the Emergency Operations Organization (EOO) is the operational department responsible for the City's emergency preparation, response, and recovery operations, while the Emergency Operation Center (EOC) is responsible for coordination of these efforts (EMD 2020). The City's General Plan Safety Element, Exhibit H, currently identifies the major disaster routes within the City (City of Los Angeles 1996). In addition, the County of Los Angeles Department of Public Works has prepared maps of freeway and local disaster routes (County of Los Angeles 2008). These routes typically parallel major north-south and east-west corridors and include freeways such as Interstate 405, U.S. 101, Interstate 710, Interstate 10 (County of Los Angeles 2008).

Construction activities can potentially interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way, due to

temporary construction barricades or other obstructions that could impede emergency access. However, project development construction will not result in interference with adopted emergency response or evacuation plans because temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. Development and implementation of these plans for all construction activity would minimize potential impacts associated with the impairment or physical interference with adopted emergency response or evacuation procedures.

In addition, increased housing development density from the Project development could result in additional traffic on area roadways. However, the goals, objectives, and policies of the Safety Element of the Los Angeles City General Plan and the Los Angeles County Operational Area Emergency Response Plan (ERP) provide guidance during unique situations requiring an unusual or extraordinary emergency response. Implementation of the ERP would involve coordination with all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid and other appropriate response procedures.

The City's EOO implements the goals and policies of the General Plan Safety Element. The Safety Element outlines the scope of the EOO's on-going efforts to use experiences and new information to improve the City's hazard program. The City's Emergency Operations Plan and individual agency ERPs set forth procedures for City personnel to follow in the event of an emergency situation stemming from natural disasters, technological incidents, and nuclear defense operations (City of Los Angeles 2018b). Furthermore, updates to the Safety Element would involve updates to safety policies and requirements, including those related to emergency response, including to incorporate the City's Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous conditions. In addition, the City of Los Angeles Department of Transportation and LAFD would be responsible for ensuring that future development does not impair or physically interfere with an adopted emergency response or evacuation plan. As part of standard development procedures, plans would be submitted for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City regulations. As discussed in Section 16, *Transportation*, potential impacts related to the effective performance of the circulation system will be discussed in the EIR, as well as other transportation related issues, such as traffic hazards, incompatible uses, and emergency access. Furthermore, the Housing Element Update would not introduce any features or policies that would preclude implementation of or alter these policies or procedures. Therefore, impacts related to emergency response plans and emergency evacuation plans would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- g. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

As further discussed in Section 20, *Wildfire*, portions of the City are subject to wildland fire risk, primarily in areas where single-family residential development abuts the undeveloped hillsides and natural areas in the northern portion of the City and around the Santa Monica Mountains (City of Los Angeles 1996). The Project development would generally be located on urban infill sites within areas well served by high quality public transit. As shown in Figure 2, these areas tend to be concentrated in the more densely urbanized portions of the City, and not near the wildland urban interfaces that are subject to high fire risk. Therefore, the proposed project would generally direct future growth away from low-density neighborhoods, such as those near the urban-wildland interface where the risk of wildland fires is heightened.

To the extent any project development is located in Very High Fire Hazard Severity Zones as mapped by the California Department of Forestry and Fire Protection (CalFIRE) and Fire Brush Clearance Zones, regulations require development to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, compliance with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD hazardous vegetation clearance requirements pursuant to the Los Angeles Fire Code (2017). Any new housing developed in such areas would be subject to these requirements. In addition, project development would be required to be constructed according to the UBC requirements for fire-protection and would be subject to review and approval by the LAFD. Therefore, the proposed project would not be anticipated to pose a substantial risk to people or structures due to wildland fires. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impact related to hydrology and water quality. However, for the purposes of providing more robust analysis and disclosure, this topic will be further discussed in the EIR as it relates to flood flows.

Housing Element Update

The City, State and federal law have extensive regulatory requirements to reduce or eliminate impacts to water quality during construction of projects. The following summarizes RCMs related to hydrology and water quality that project development would comply with:

- **RCM-WQ-1 (National Pollutant Discharge Elimination System General Permit):** Prior to issuance of a grading permit, the applicant is required to obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for Phase 1 of the proposed Project. The Applicant is required to provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan needs to be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan needs to identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.
- **RCM-WQ-2 (Dewatering):** If required, any dewatering activities during construction are required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters

in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.

- **RCM-WQ-3 (LID Plan):** Prior to issuance of grading permits, the Applicant is required to submit a LID Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.
- **RCM-WQ-4 (Best Management Practices):** BMPs need to be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPS are required to meet this numerical threshold standard.
- **RCM-WQ-5 (Alteration of a State or Federal Watercourse):** Development is required to comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the applicant is required to consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance is to be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:
 - *United States Army Corps of Engineers.* The applicant is required to obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory Division, 805-585-2148.
 - *State Water Resources Control Board.* The applicant is required to consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6759.
 - *California Department of Fish and Wildlife.* The applicant is required to consult with the Lake and Streambed Alteration (LSA) Program and obtain a Streambed Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSA Program, 3883 Ruffin Road, San Diego, CA 92123, (858) 636-3160.

- **RCM-WQ-6 (Flooding/Tidal Waves):** Development is required to comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective July 3, 1998.
- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The Housing Element Update would encourage new residential development on infill sites within urban areas of the City. Construction of project development could potentially impact surface or ground water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids. Section D of LAMC Article 4.4, *Stormwater and Urban Runoff Pollution Control*, requires owners or developers to implement stormwater pollution control requirements for construction activities depicted in the project plans, which are subject to approval by the Department of Building and Safety; the Director of the Department may require additional and/or alternative site-specific BMPs or conditions, if needed. Likewise, regulations described in RCM-WQ-4 (Best Management Practices) require implementation of BMPs. In addition, regulations described in RCM-WQ-1 (National Pollutant Discharge Elimination System General Permit) require construction activities on a site of more than one acre, or on a site which is part of a larger development plan that would total more than one acre, would be subject to the NPDES Statewide General Construction Activity Stormwater Permit. Operators of a construction site would be responsible for preparing and implementing a SWPPP that outlines project specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants in stormwater. Typical BMPs include covering stockpiled soils, installation of silt fences and erosion control blankets, and proper handling and disposal of wastes. Compliance with these regulatory requirements would minimize impacts to water quality during the construction of future project development.

In addition, in accordance with RCM-WQ-3 (LID Plan), all project development would be required to comply with the LID Ordinance and Stormwater and Urban Runoff Pollution Control Ordinance, which require the inclusion of BMPs in a project's design to prevent, control and reduce stormwater pollutants. Typical BMPs include source prevention and treatment control, such as catch basin filters and infiltration/detention basins, as well as minimizing impervious paving. The City's Stormwater and Urban Runoff Pollution Control Ordinance requires future development to comply with the SUSMP requirements, if applicable, integrate LID practices and standards for stormwater pollution mitigation, and maximize open, green, and pervious space on all development consistent with the City's landscape ordinance and other related requirements. BMP requirements are enforced through the City's plan approval and permit process and plans for all new development projects are subject to City inspection. Compliance with the LAMC would ensure that Project development does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. All future project-related activities would also be subject to Sections A and B of the LAMC Article 4.4, which generally prohibits discharge of specific materials into the storm drain system or receiving waters, such as the Los Angeles River.

Compliance with federal, State, and local regulations would reduce impacts resulting from project development to a less than significant level. Furthermore, the Housing Element Update would not introduce any features that would preclude implementation of or alter these policies and procedures in any way. Therefore, the proposed project would not violate any water quality standards or waste discharge requirements, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The LADWP provides water service in the City. In recent years, groundwater has comprised approximately 12 percent of LADWP's total water supply (LADWP 2016). The City of Los Angeles lies above several groundwater basins, including the Sylmar, Verdugo, Tujunga, Eagle Rock, San Fernando, Coastal Plain of Los Angeles, West Coast, Santa Monica, and Central Groundwater Basins. The most important of these basins are the San Fernando and Central Basins (City of Los Angeles 1995). The LADWP relies on several of these local groundwater sources, including the Coastal Plain of Los Angeles Groundwater Basin, Central Basin, San Fernando Basin, and Sylmar Basin. The City owns water rights in the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins (LADWP 2016). All these basins are controlled by court adjudications, which prevents depletion of groundwater supplies and limits the amount of groundwater resources that the City may extract; the City's combined water rights in these basins are approximately 109,809 acre-feet per year (AFY) (LADWP 2016).

While project development could increase demand for LADWP water by increasing residential density, this demand would need to be met in a number of ways other than increasing groundwater withdrawal, such as increasing the amount of water purchased from the Metropolitan Water District (MWD) of Southern California, implementing water conservation measures, increasing use of recycled water, and/or implementing groundwater recharge projects. See Section 19, *Utilities and Service Systems*, for a discussion of the adequacy of LADWP water supplies for meeting future demand in the City.

Future development would not substantially increase the amount of impervious surface in the City because the Housing Element Update would prioritize development on infill areas that are already urbanized and largely covered with impervious surfaces; therefore, the proposed project would not interfere substantially with groundwater recharge. Implementation of the Housing Element may provide some benefits to groundwater recharge by replacing older development with new development subject to open space, landscaping, and stormwater BMP requirements that would increase pervious surfaces associated with new development.

Construction activities associated with project development, such as excavation for subterranean parking lots and foundation-laying for tall buildings, could potentially extend

into the underlying groundwater table. Construction activities overlying areas with shallower groundwater depth could expose groundwater resources to contamination. However, the risk of groundwater contamination during construction is minimal and would most likely occur due to spills or leaks from equipment or materials used in construction. Furthermore, the regulations described in RCM-WQ-2 (Dewatering) would require that construction of any future projects involving dewatering activities to comply with the applicable dewatering requirements to protect groundwater supplies and quality. Likewise, LAMC Article 4.4 and RCM-WQ-4 (Best Management Practices) require that any future projects include construction BMPs to prevent contamination of stormwater and runoff in its project plans. These BMPs are subject to City review and are required to be implemented during construction. Developers of individual project sites one acre or more in size are also required to prepare a SWPPP, which includes BMPs to prevent contamination of stormwater and runoff during construction. Typical construction BMPs to prevent stormwater contamination would also prevent contamination of groundwater resources, as exemplified by the following BMPs:

- Construction equipment and vehicles shall be properly maintained.
- All materials shall be properly stored and transported.
- Fuels will be stored in secure areas.

With implementation of appropriate construction BMPs, the impact of the proposed project on groundwater resources would be minimized and impacts to groundwater supplies and sustainable groundwater management would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The Housing Element Update would prioritize new housing development on infill sites in urbanized areas with access to quality public transit infrastructure. Under existing conditions, the infill sites prioritized for new housing development would be almost entirely paved and/or developed with structures. Therefore, project development would not be anticipated to substantially alter drainage patterns. Consequently, the proposed project would not alter

the drainage pattern of the City to an extent that would result in substantial erosion, siltation, or flooding on- or off-site.

Although implementation of the Housing Element Update would increase the residential density in priority areas of the City, project development is not expected to result in substantial additional sources of polluted runoff since residential uses are not associated with high levels of stormwater pollution. Examples of contaminants associated with these uses include garbage, leaked vehicle fuels, and household products. In addition, any new development or re-development projects would comply with the regulations described in RCM-WQ-1 (National Pollutant Discharge Elimination System General Permit), RCM-WQ-3 (LID Plan), and RCM-WQ-4 (Best Management Practices) to incorporate design BMPs to capture and treat runoff, in accordance with regulations deriving from the Los Angeles County NPDES MS4 permit (i.e., SUSMP, LID Ordinance, LID Handbook). As discussed under impact discussion *a.* of this section, future construction activities would be required to include BMPs to prevent stormwater contamination and reduce runoff, pursuant to LAMC Article 4.4, and potentially the NPDES General Construction Permit depending on the size of future development projects. Therefore, future development would not introduce substantial additional sources of polluted runoff.

Because implementation of the Housing Element Update would not substantially alter the existing drainage pattern and development and construction of future projects would be required to implement stormwater BMPs, project development would not generate a substantial increase in runoff that would result in substantial erosion, siltation, flooding on- or off-site, or increased polluted runoff. Impacts related to drainage and runoff would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Flood control and storm drainage systems in the City include the following:

- Debris basins at the mouths of canyons to slow the flow of water and trap boulders, rocks and debris and to prevent clogging of the flow channels
- Flood control basins (dams) at the upstream portions of the rivers to contain water and regulate downstream flow
- Containment of over 400 miles of river and tributary systems within mostly open concrete flood control channels
- Streets, gutters and catch basins to collect and route surface flows to storm drains which carry urban run-off to the flood control channels and ocean
- Spreading grounds in the San Fernando Valley to impound storm water and allow it to percolate into the ground
- Associated bridges, reservoirs and water storage facilities

The purpose of the flood control system is to quickly carry storm waters to the Santa Monica and San Pedro bays to prevent flooding (City of Los Angeles 1996).

The City contains areas subject to 100-year and 500-year floods, which are mapped by FEMA. In general, areas subject to flood risk include the Los Angeles River and other river and stream channels and embankments, areas surrounding reservoirs such as the Hollywood Reservoir and Hansen Dam, and coastal areas (City of Los Angeles 2018c). However, areas subject to 500-year floods may also include areas of the City that are not near reservoirs or waterways, such as Central and South LA. As discussed under impact discussions *c.(i)*, *c.(ii)*, and *c.(iii)* of this section., the project development would be primarily located on infill sites in urban areas which are almost entirely paved and/or developed with structures. However, the project could also result in development on unpaved hillside areas. Therefore, while most project development would not be anticipated to substantially alter drainage patterns, the project could result in hillside development with the potential to redirect or impede flood flows.

All project development would be required to comply with the regulations described in RCM-WQ-5 (Alteration of a State or Federal Watercourse) to minimize the potential for impacts to jurisdictional watercourses. In addition, as specified in RCM-WQ-6 (Flooding/Tidal Waves), all project development that would occur in a flood risk zone would be subject to restrictions and requirements established by the City's permitting process and would be required to incorporate appropriate City and FEMA flood plain management measures in the design of new buildings, as described in the Floodplain Management Plan and enforced by the Department of Building and Safety. Nonetheless, for the purposes of providing more robust analysis and disclosure, impacts to flood flows associated with the Housing Element Update will be further discussed in the EIR. In addition, as discussed under *Safety Element Update* of this section, the potential impacts related to flood flows under the Safety Element Update will also be further analyzed in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

As discussed under impact discussion *c(iv)* of this section, portions of the City lie in flood hazard zones, particularly surrounding rivers, streams, and reservoirs. In addition, areas of the City along the coast of the Pacific Ocean could be impacted by flooding in the event of a tsunami. There is also the potential for dam failure or seiches produced on inland bodies of water to cause flooding in parts of the City. Exhibits F and G of the General Plan Safety Element illustrate areas in the City that are subject to inundation risks (City of Los Angeles 1996).¹⁶

There are three general areas subject to tsunami risk are the Port of Los Angeles area, coastal areas south of the City of Santa Monica and north of the South Bay Cities (Venice Beach, Marina Del Rey, and Playa del Rey), and the coastal stretch of the City north of Santa Monica

¹⁶ Note: 100-year and 500-year flood areas shown on Exhibit F of the Safety Element may be slightly different due to updates to FEMA flood maps in the years since 1996.

and south of the City of Malibu (Pacific Palisades area) (DOC 2009). Tsunami flooding risk is limited to a relatively narrow stretch of the land closest to the coast, and the majority of the City lies outside of the Tsunami Inundation Zone.

Project development could potentially involve denser residential development in areas subject to tsunami risk. However, in the event of a tsunami, the City has established response procedures as described in Chapter 12 of the City's Local Hazard Mitigation Plan to mitigate risks associated with tsunamis (City of Los Angeles 2017). In addition, new development located in tsunami hazard zones would not increase the potential for tsunami hazards.

According to the City's Local Hazard Mitigation Plan, there are 27 reservoirs and associated dams with the potential to impact the City should dam failure or seiche occur (City of Los Angeles 2017). The California Division of Safety of Dams oversees the design and construction of dams and conducts yearly inspections to ensure that the dams are performing and being maintained in a safe manner. Dams that could impact the City are regularly inspected and meet current safety regulations. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow. In addition, the City's Local Hazard Mitigation Plan provides a list of existing programs, proposed activities, and specific projects that may assist the City in reducing risks and injury from natural and human-made hazards, including dam failure, tsunami, and flooding. Thus, given that dams in the vicinity of the City are regularly inspected by the California Division of Safety of Dams and existing programs and activities are in place to reduce possible risks of dam failure and overtopping due to seiche, the failure of the dam during a catastrophic event, such as a severe earthquake, is considered unlikely.

The type of development expected to occur under the Housing Element Update is typical of urban environments. Project development would be concentrated on urban infill sites and would not substantially alter the overall development patterns in the City. The Housing Element Update would increase development capacity, thereby potentially increasing the number of people and structures exposed to potential flooding, including flooding as a result of a levee or dam failure; however, this condition already exists and the proposed project would not cause or accelerate existing flood hazard. Furthermore, while there is the potential for a tsunami, flooding, or dam failure to impact portions of the City, as discussed under Section 9, *Hazards and Hazardous Materials*, future housing developments under the proposed project would not involve the storage or use of significant quantities of hazardous materials. In addition, future projects would be developed in accordance with the regulations described in RCM-WQ-6 (Flooding/Tidal Waves) to ensure compliance with the requirements of the Flood Hazard Management Specific Plan. Therefore, risks related to the release of hazardous materials due to inundation are minimal and the Housing Element Update would have less than significant impacts.

LESS THAN SIGNIFICANT IMPACT

- e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Potential water quality and groundwater impacts associated with the Housing Element Update are discussed above under impact discussion *a.* and *b.* The Housing Element Update would not contain any policies that would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Furthermore, future project would be required to comply with the existing regulations discussed under *Impacts a.* and *b.* of this section, including during construction and operation, and would not otherwise substantially degrade water quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to land use and planning.

Housing Element Update

- a. *Would the project physically divide an established community?*

The Housing Element Update would prioritize the development of new housing on infill sites within areas with existing public transit infrastructure. Project development would occur in already urbanized areas of the City and would not involve the construction of new roads, railroads, or other features that may physically divide established communities in the City. Consequently, there would be no impact associated with the physical division of an established community.

NO IMPACT

- b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The Housing Element Update examines the City of Los Angeles' housing needs, as they exist today, and projected future housing needs. This update focuses on addressing the City's housing needs by providing goals, policies and programs associated with fair housing, the prevention of displacement, promoting housing stability, producing housing adequate to meet need, ensuring equitable distribution of housing, expanding access to opportunity, reducing GHG emissions through an improved jobs-housing balance, promoting climate resiliency and sustainability, and the prevention of homelessness. The proposed project includes actions the City is undertaking to achieve its housing RHNA targets and also would implement SCAG's land use goals and policies by primarily placing new development in areas with access to transit, jobs and services, thus minimizing vehicle trips and GHG emissions.

Upon its adoption by the City, the Housing Element Update would serve as a comprehensive statement of the City's housing policies and as a specific guide for program actions to be taken in support of those policies. The Housing Element Update is a policy document that encourages housing opportunities in infill areas. As discussed under *Description of Housing Element Update*, Under Housing Element law, the City must show that it has adequate land zoned to accommodate the entirety of its 2021-2029 RHNA allocation of 455,577 units under the Housing Element Law. Of these units, a total of 184,273 units must accommodate the City's lower-income RHNA, which means they must be identified on multi-family-zoned sites that have a minimum density of 30 du/acre, or in the R3 or a less restrictive zone. Recent changes to state Housing Element law have strengthened housing replacement requirements related to the Inventory of Sites. For example, the Inventory of Sites must demonstrate compliance with AB 686 by incorporating an analysis of how the sites are consistent with AFFH goals. For non-vacant sites, the methodology used to identify realistic development potential must consider factors such as existing uses, past development trends, market conditions, and the availability of regulatory and/or other development incentives. Furthermore, the Rezoning Program will be accomplished by 2024 through targeted zone changes, consistency with AFFH requirements, and updates to the City's community plans (Land Use Element), Density Bonus program, specific plans and overlays, and other zoning ordinances. The Rezoning Program may also consider rezoning or development incentives in existing lower density residential zones to create opportunities for missing middle housing typologies (up to low-medium residential density) in these areas. Adoption of the Housing Element Update would not grant entitlements for any project and future development proposals that are intended to assist in meeting the City's projected housing need, including those facilitated by the Rezoning Program, would be reviewed by the City for consistency with all adopted local and State laws, regulations, standards and policies. For the purposes of providing more robust analysis and disclosure of conflicts with any land use plan, policy, or regulation, this topic will be further discussed in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to mineral resources.

Housing Element Update

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

The Housing Element Update would prioritize new housing development on infill sites in urban areas well served by public transit. While the City contains petroleum deposits and designated areas for oil drilling, project development under the proposed project would primarily occur in existing commercial and residential areas, which are generally not compatible with mineral extraction. It is not anticipated that project development would occur on lands presently in use for mineral extraction. Furthermore, the Housing Element Update does not include any policies that related to mineral resources or conflict with existing General Plan policies and City ordinances regulating the conservation and use of mineral resources. Therefore, the proposed project would not result in a loss of availability of a known mineral resource and there would be no impact.

NO IMPACT

- b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

The California Surface Mining and Reclamation Act of 1975 (SMARA, PRC Section 2710 et seq.; subsequently amended) was enacted to promote conservation and protection of significant mineral deposits. SMARA requires the State to identify and classify mineral deposits within the State as either: (1) containing little or no mineral deposits (MRZ-1), (2) significant deposits (MRZ-2) or (3) deposits identified but further evaluation needed (MRZ-3 and MRZ-4). To comply with SMARA, the City adopted LAMC Section 13.03, which regulates the establishment of sand and gravel districts, extraction operations, mitigation of potential noise, dust, traffic, and other potential impacts, as well as post extraction site restoration. In addition, LAMC Section 13.01, which delineates where oil extraction is permitted and regulates oil extraction activities within the City, was adopted in 1953.

Rock, sand, and gravel deposits in the City lie along the Los Angeles River flood plain and coastal plain, with significant potential deposit sites identified by the State geologist along the Los Angeles River flood plain between the San Fernando Valley and Downtown Los Angeles (City of Los Angeles 2001). However, the only currently available gravel/sand deposit site in the City is the Tujunga alluvial fan located in the Sunland-Tujunga area of the City, as mining beach sand is not permitted by the State (City of Los Angeles 2001). Oil deposits underly portions of Downtown and West Los Angeles, as well as the harbor area and the Santa Monica and San Pedro Bays. There are twenty oil fields in the City that currently produce oil (City of Los Angeles 2001). Mineral resource extraction in the City is constrained by high levels of development, much of which took place prior to the enactment of SMARA and the classification of local minerals by the State geologist (City of Los Angeles 2001).

As discussed under impact discussion *a.* of this section, the Housing Element Update would prioritize new housing development on infill sites along dense transit corridors that primarily consist of commercial and mixed-use development, which are not considered compatible with mineral extraction. Project development under the proposed project could potentially occur on lands classified by the State geologist as having significant deposits of mineral resources, as many residential and commercial areas were established within the City prior to the mapping of mineral resources. However, as most of this development would be infill of existing urban spaces, these projects are not anticipated to directly impact mineral resources. Mineral resources in the City are subject to existing federal, State, and City policies and guidelines. Therefore, the proposed project would result in less than significant impacts related to statewide and regional mineral resources.

LESS THAN SIGNIFICANT IMPACT

13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to noise.

Housing Element Update

The City has extensive regulatory requirements related to construction and operational noise in the City. Any future development projects would be required to comply with the following noise regulations described in the RCMs below:

- **RCM-NOI-1 (LAMC Noise Ordinances):** Development is required to comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 (see LAMC Section 112.05),

and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels.

- **RCM-NOI-2 (Construction Hours):** Construction is restricted to the hours of 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. LAMC Section 41.40.
 - **RCM-NOI-3 (Construction Site Notice):** Development is required to comply with the City of Los Angeles Building Regulations Ordinance No. 178,048 (see LAMC Section 91.106.4.8), which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice needs to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.
 - **RCM-NOI-4 (HVAC Noise):** Development is required to comply with the City of Los Angeles LAMC Section 112.02, which requires that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.
- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The Los Angeles Noise Ordinance, Noise Element of the General Plan, and the Los Angeles Noise Compatibility Guidelines are the applicable noise-related standards and guidelines for Los Angeles. Project development could generate temporary noise levels in excess of allowable City standards. The operation of project development has the potential to generate vehicle trips to and from individual projects and include operational noise sources including, but not limited to, HVAC equipment and hauling/delivery vehicles. Operation of project development may have the potential to exceed operational thresholds for receiving land uses and sensitive receivers, if located nearby. Although individual developments would be required to comply with the regulations described in RCM-NOI-1 through RCM-NOI-4, potential noise impacts related to substantial temporary or permanent increases in noise, in excess of City standards, could occur and will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction activity can result in varying degrees of ground vibration depending on the equipment and methods employed. Operation of construction equipment causes vibrations that spread through the ground and diminish in strength with distance. Project development may result in excessive short- and/or long-term groundborne vibration or noise from construction or operation activities if located adjacent to sensitive receivers, such as residences, hospitals, schools, libraries, churches, or fragile buildings where vibration damage can occur. Issues related to groundborne vibration and groundborne noise will be evaluated in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

As discussed in Section 8, *Hazards and Hazardous Materials*, there are several airports within the City of Los Angeles or its vicinity, including the Los Angeles International Airport, Santa Monica Municipal Airport, Van Nuys Airport, Hollywood Burbank Airport, Long Beach Airport, San Gabriel Valley Airport, and Hawthorne Municipal Airport. The Housing Element Update would not contain policies that would conflict with the airport land use plans established by ALUC, nor would it emphasize building housing in the immediate vicinity of airports. If project development were proposed within two miles of an airport or within an airport influence area, it would be required to comply with applicable regulations and standards. This includes, but is not limited to, the 2019 CBC Title 24, Part 2, Section 1206.4 (Allowable Interior Noise Levels) of the California Code of Regulations which states that interior noise levels attributable to exterior sources shall not exceed 45 CNEL in any habitable room. In addition, adherence to California Noise Insulation Standards of 1988 (CBC Title 24, Section 3501 et seq.) requires that applicants with housing projects in the vicinity of an airport submit an acoustical analysis indicating that a 45 decibels (dB) or less will be achieved in each proposed habitable room. Nonetheless, project developments under the proposed project may be subject to excessive noise levels from overhead flights, particularly in neighborhoods within an airports' established noise controls. Potential impacts will be further evaluated in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

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14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|---|---|---|---|
| a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? | ■ | □ | □ | □ |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | ■ | □ | □ | □ |

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impact related to population and housing. However, it is possible that new policies may discourage redevelopment of certain disaster-prone areas after a disaster, which could have the effect of displacement. Therefore, for the purposes of providing more robust analysis and disclosure, this topic will be further discussed in the EIR for impacts related to displacement.

Housing Element Update

The City has established regulatory requirements related to the displacement of tenants within various types of housing. Future development under the proposed project would be required to comply with those regulations described in the RCMs below:

- RCM-PH-1 (Tenant Displacement):
 - **Apartment Converted to Condominium** - Prior to final map recordation, and pursuant to the provisions of Section 12.95.2-G and 47.06 of the LAMC, a tenant

relocation plan shall be submitted to the Los Angeles Housing Department for review and approval.

- **Apartment Demolition** - Prior to the issuance of a demolition permit, and pursuant to the provisions of Section 47.07 of the LAMC, a tenant relocation plan shall be submitted to the Los Angeles Housing Department for review and approval.
 - **Mobile Home Park Closure or Conversion to Different Use** - Prior to the issuance of any permit or recordation, and pursuant to the provisions of Section 47.08 and 47.09 of the LAMC, a tenant relocation plan and mobile home park closure impact report shall be submitted to the Los Angeles Housing Department for review and approval.
- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The Housing Element Update would emphasize the creation of new housing units within urban infill areas of the City, which would increase development density throughout the City. As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units to meet the City's RHNA, which is determined by SCAG to quantify the need for housing within each jurisdiction based on anticipated growth. The RHNA allocation is intended to accommodate forecasted population growth in addition to addressing overcrowding in the City. As such, the Housing Element Update would relieve overcrowding and existing cost burden, while also providing housing for the existing unsheltered and unhoused population. However, the project does have the potential to result in additional population growth beyond that forecasted by SCAG. Therefore, impacts related to direct population growth associated with the Housing Element Update will be further analyzed in an EIR. Other physical impacts associated with the development of up to 429,261 new housing units are either discussed in this Initial Study or will also be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Project development would involve new development and redevelopment projects on infill sites within areas with existing public transit infrastructure. Redevelopment projects in particular may potentially result in the displacement of some existing housing units and residents. However, goals, policies, and objectives included the Housing Element Update aim to prevent displacement and promote housing stability. Under the Housing Element Update, all identified non-vacant sites are required to comply with the housing replacement requirements in Government Code Section 65583.2(g)(3), meaning that any multi-family residential development on a non- vacant site would be required to replace any existing on-site housing units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income, or are otherwise subject to any form of rent or price control (including any that existing on-site within the

previous five years). In addition, the Housing Element Update would provide additional opportunities for housing by expanding areas where housing is allowed. The Housing Element Update is forecast to result in a substantial net increase in the number of available housing units in the City, including a total target zoned capacity of 230,338 units for lower-income households identified in the Sites Inventory, and it is anticipated that any replacement housing need created by displacement of existing housing would be more than offset through implementation of the Housing Element and potential re-zone program. Therefore, impacts related to displacement associated with the Housing Element Update would be less than significant. Nonetheless, as discussed under *Safety Element Update* of this section, the Safety Element Update's potential impacts related to displacement will be further discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for 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 for any of the public services:				
1 Fire protection?	■	□	□	□
2 Police protection?	■	□	□	□
3 Schools?	■	□	□	□
4 Parks?	■	□	□	□
5 Other public facilities?	□	□	■	□

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impact related to public services. However, for the purposes of providing more robust analysis and disclosure, this topic will be further discussed in the EIR as it relates to fire protection.

Housing Element Update

The City and State law have established regulatory requirements for development projects that are intended to reduce impacts to public services. Project development would be subject to the regulations related to public services described in the following RCMs:

- **RCM-PS-1 (Payment of School Development Fee):** Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, is required to ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995.
- **RCM-PS-2 (Increased Demand for Parks or Recreational Facilities):**
 - **Subdivision:** Pursuant to Section 17.12 or 17.58 of the LAMC, the applicant is required to pay the applicable Quimby fees for the construction of dwelling units.
 - **Apartments:** Pursuant to Section 21.10 of the LAMC, the applicant is required to pay the Dwelling Unit Construction Tax for construction of apartment buildings to be used for parks and recreational facilities.
- **RCM-PS-3 (Increase Demand for Parks or Recreational Facilities – Zone Change):** Pursuant to Section 12.33 of the LAMC, the applicant is required to pay the applicable park fees for the construction of dwelling units.

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Fire protection in the City is provided by the LAFD. In particular, the primary duties of the LAFD Fire Development Services Unit is to conduct Fire Life Safety Plan Checks and Fire Life Safety Inspections, which aim to enforce applicable standards of the California Fire Code (Title 24, Part 9), California Code of Regulations Title 19, Los Angeles Fire Code (LAMC Chapter 5, Article 7), and LAMC Section 57.09.03, Section 57.09.06 and Section 57.09.07 concerning new construction and remodeling. Furthermore, the LAFD Hydrants and Access Unit reviews plans to evaluate adequacy of site access and hydrant placement. Potential impacts of the Housing Element Update, such as placing an unanticipated burden on fire protection services or affecting response times or service ratios, such that new or expanded fire protection facilities would be needed, will be further analyzed in an EIR. In addition, as discussed under *Safety Element Update* of this section, the potential impacts related to fire protection under the Safety Element Update will also be further analyzed in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

- a.2. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

Police protection services in the City are provided by the Los Angeles Police Department (LAPD), which has approximately 9,000 sworn officers and 3,000 civilian employees. Based on these totals, this equates to approximately one officer for every 433 residents, giving Los Angeles one of the lowest ratios of police officers to residents of any major city in the country (LAPD 2020). Potential impacts of the Housing Element Update, such as placing an unanticipated burden on police protection services or affecting response times or service ratios, such that new or expanded police protection facilities would be needed, will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- a.3. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Project development can affect the need for new or physically altered school facilities when residential dwelling units are constructed and student population increases beyond existing capacity.

All development in California is subject to California Government Code Section 65995, which allows school districts to collect impact fees from developers of new residential projects. RCM-PS-1 (Payment of School Development Fee) would require future development projects under the proposed project to pay their fair share of impact fees to the school system. These fees are collected on residential development and may be used to pay for all of the following: land (purchased or leased) for school facilities, design of school facilities, permit and plan checking fees, construction or reconstruction of school facilities, testing and inspection of school sites and school buildings, furniture for use in new school facilities, and interim school facilities (purchased or leased) to house students generated by new development while permanent facilities are constructed.

The Housing Element Update would not directly affect local schools, but it may generate new students entering the Los Angeles Unified School District. Potential impacts of the Housing Element Update, such as placing an unanticipated burden on existing school facilities, such that new or expanded schools would be needed, will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- a.4. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Project development can affect the need for new or physically altered recreational facilities when residential dwelling units are constructed and demand increases beyond existing capacity. All future project development would be required to comply with the regulations described in RCMs-PS-2 (Increased Demand for Parks or Recreational Facilities) and RCM-PS-3 (Increase Demand for Parks or Recreational Facilities – Zone Change), which state that developers of individual development projects, with the exception of ADUs, would be required to pay park mitigation fees (for non-subdivision projects) or dedicate land or pay Quimby in-lieu fees (for subdivision projects) to mitigate for the increased demand placed on parks and recreational facilities. Park fee amounts are reviewed and updated annually by the City.

In 2012, the City's Department of Recreation and Parks launched the 50 Parks Initiative based on findings in the 2009 *Citywide Community Needs Assessment* indicating that park facilities are not equitably distributed across the City and that many communities do not have parks within a reasonable distance. The 50 Parks Initiative seeks to build 50 parks in densely populated neighborhoods or communities currently lacking sufficient park space and recreational facilities (DRP 2020). The 50 Parks Initiative exemplifies the kind of park facilities the City is currently implementing and is likely to continue implementing in the dense urban areas of Los Angeles. Most of the parks are pocket parks less than an acre in size with playground structures and exercise machines. These parks typically include zero or minimal structures and green space, and, because they are intended to serve the local community and be accessible by foot and bike, do not provide parking (Ferguson et al. 2014). The construction and operation of such small-scale facilities would be expected to have minimal environmental impacts. For example, these parks would be located on urban infill lots lacking biological or cultural resources; generate minimal vehicle traffic to the site which would limit air quality, GHG emissions, noise, and transportation impacts; and be able to accommodate a limited number of people due to their small size, which would reduce park noise levels. Existing regulations and General Plan policies would provide funding for the provision of new recreational facilities necessitated under the Housing Element Update. Although project development increase demand for additional recreational facilities, the lack of available space for new parks in the City would limit overall construction or alteration of parks and recreational facilities such that associated environmental impacts would be less than significant. Nonetheless, potential impacts of the Housing Element Update, such as placing an unanticipated burden on park services, such that new or expanded park facilities would be needed, will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

a.5. *Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The Housing Element Update would emphasize the creation of new housing units within urban infill areas of the City, which could increase demand for other public facilities, such as libraries. Impacts related to increased demand for other public facilities such as stormwater, wastewater, and utility facilities are discussed in Section 19, *Utilities and Service Systems*. Project development could affect the need for new or physically altered libraries when residential dwelling units are constructed and demand increases beyond existing capacity. It is anticipated that potential future residents would likely use the Los Angeles Public Library (LAPL) system, potentially increasing the number of library facility users. According to the LAPL, however, 75 percent of L.A. residents visit the library less than once a month, and 18 percent have not visited a public library more than once in the last five years (LAPL 2015). Therefore, an increase in potential residents from project development is unlikely to result in a substantial increase in annual visits to library facilities. In addition, with the passage of Measure L in 2011, the LAPL is offering enhanced programs, expanded collections, additional technology, an expanded digital presence, and increased opportunities for connection within and between communities. The LAPL Strategic Plan 2015-2020 sets goals to increase the number of people who use library services and actively promote and market programs and services to increase overall engagement with the library. Demand for library facilities may also be offset over time due to increased use of digital materials available through LAPL's online catalog; circulation of e-media is expected to increase from 2,200,000 in 2014 to 3,000,000 in 2020 (LAPL 2015).

The proposed project is not expected to cause an exceedance of capacity at existing facilities or to generate a substantial demand for the community branch libraries serving the City, and it is unlikely that expansion or construction of new library facilities would be required. Since the Housing Element Update would not affect the need for new or physically altered public facilities, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	■	□	□	□
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	■	□	□	□

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to recreation.

Housing Element Update

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

Project development could increase the use of existing neighborhood and regional parks. As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units. This would increase demand for parks and recreational facilities, although as the City is highly urbanized and built out, there is not much space to build new parks to meet this need. Therefore, it is likely that existing parks would be used with greater frequency, potentially to the point of overuse and physical deterioration of facilities. Though future development projects would be required to comply with the regulations described in RCMs-PS-2 (Increased Demand for Parks or Recreational

Facilities) and RCM-PS-3 (Increase Demand for Parks or Recreational Facilities – Zone Change) related to the payment of park fees, if demand for these uses increases beyond existing capacity, substantial physical deterioration of these facilities could be accelerated. The potential impacts on existing neighborhood and regional facilities will be addressed further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

This impact is considered to be analogous to the impact discussed in Public Services for parks. The proposed project does not include the construction or expansion of parks but it is reasonably foreseeable that the indirect impact of the build out of the RHNA will result in the demand for new parks and the construction of new parks. This impact will be discussed in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	■	□	□	□
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	■	□	□	□
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	■	□	□	□
d. Result in inadequate emergency access?	■	□	□	□

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to transportation, rather the Safety Element Update to improve policies and regulations associated with hazardous designs or inadequate emergency access.

Housing Element Update

The City has established regulatory requirements to minimize the impacts of construction on transportation within the City. Future developments under the proposed project would be subject to the following regulations:

- **RCM-TRAF-1 (Major Transit and Transportation Construction Impact Area):** As applicable, development is required to comply with Chapter VI, Section 62.250 of the

LAMC, which established permitting requirements for projects that intend to perform activity or work in the streets (including sidewalks) within the Major Transit and Transportation Construction Impact Area. Major Transit and Transportation Construction Impact Areas include the following:

- **Area E:** The area bounded clockwise by North Hill Street, Bernard Street, North Broadway, North Spring Street, Los Angeles River (west bank) and the 101 Freeway.
 - **Area F:** The area bounded clockwise by North Figueroa Street, Marmion Way, Monte Vista Street, Avenue 61, Piedmont Avenue, Figueroa Street, Pasadena Avenue, North San Fernando Road, and the following street segments: Avenue 50 from Malta Street to Monte Vista Street, Avenue 52 from Figueroa Street to Echo Street, Avenue 54 from Ash Street to Monte Vista Street, Avenue 54 from Figueroa Street to Longfellow Street, Avenue 57 from Figueroa Street to Media Drive, Avenue 60 from Figueroa Street to Echo Street and Avenue 61 from Terrace Drive to Monte Vista Street.
 - **Area G:** The area bounded clockwise by Cesar E. Chavez Avenue, North Indiana Street, East 3rd Place, East 4th Street, Alameda Street, East 1st Street, North Hope Street, and North Grand Avenue.
 - **Area H:** The area bounded clockwise by Victory Boulevard, De Soto Avenue, Vanowen Street, Corbin Avenue, Victory Boulevard, Fulton Avenue, Oxnard Street, Coldwater Canyon Avenue, Burbank Boulevard, Vineland Avenue, Magnolia Boulevard, Woodman Avenue, Burbank Boulevard, Balboa Boulevard, Oxnard Street, Topham Street, Victory Boulevard, De Soto Avenue, Oxnard Street, and Variel Avenue.
 - **Area I:** The area bounded clockwise by Wilshire Boulevard, Bundy Drive, San Vicente Boulevard, Federal Avenue, Ohio Avenue, Veteran Avenue, Wilshire Boulevard to City Limit, Santa Monica Boulevard, Century Park East, West Pico Boulevard, Centinela Avenue, West Olympic Boulevard, and Centinela Avenue.
- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
 - b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*
 - c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*
 - d. *Would the project result in inadequate emergency access?*

The proposed project may allow for development of currently undeveloped parcels and for alteration, intensification, or redistribution of existing residential land uses. This could result in increased trips compared to existing conditions. Trips generated as a result of project development have the potential to impact intersection and roadway segments throughout the City. The proposed project may also conflict with applicable plans and policies addressing the circulation system. Potential impacts related to CEQA Guidelines Section 15064 pertaining to VMT and compliance with plans and policies that establish measures of effective

performance of the circulation system will be discussed in an EIR, as well as other transportation related issues, such as traffic hazards, incompatible uses, and emergency access.

POTENTIALLY SIGNIFICANT IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|---|---|---|---|---|
| <p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</p> | ■ | □ | □ | □ |
| <p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p> | ■ | □ | □ | □ |

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to tribal cultural resources.

Housing Element Update

As of July 1, 2015, AB 52 of 2014 was enacted to expand CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "a project with an effect that may

cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) define tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

Project development would primarily occur on infill sites in areas with existing public transit infrastructure and in areas that have previously been developed and disturbed. It is likely that previous grading, construction, and modern use of the sites would have either removed or destroyed tribal cultural resources within surficial soils. Nonetheless, there is the potential for tribal cultural resources to exist below the ground surface throughout the City, which could be disturbed by grading and excavation activities associated with new housing development.

Consistent with AB 52, the City must consult with traditionally and culturally affiliated Native American tribes to determine if the Housing Element Update would result in a substantial adverse change in the significance of a tribal cultural resource. The City prepared and mailed AB 52 notification letters to each tribe listed by the NAHC on November 12, 2020.

The Fernandeano Tataviam Band of Mission Indians requested consultation with the City. The initial consultation meeting was held on December 1, 2020 and ongoing consultation has followed. No other tribes requested consultation. A summary of the consultation process and further evaluation of the project's potential impacts on important tribal cultural resources as part of AB 52 will be included in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	■	□	□	□
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	■	□	□	□
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	■	□	□	□
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	□	□	■	□
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	□	□	■	□

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to

the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update is unlikely to result in any adverse impact related to utilities and service systems. However, expanded resiliency policy could potentially result in the relocation of critical infrastructure out of disaster-prone areas, and/or the expansion of utilities and infrastructure to improve resilience. Therefore, for the purposes of providing a more robust analysis and disclosure, this topic will be further discussed in the EIR.

Housing Element Update

The City has established regulatory requirements related to water supply and solid waste, as well as those discussed in Section 6, *Energy*, and Section 8, *Greenhouse Gas Emissions*, related to sustainability. Project development would be subject to the regulations described in the following RCMs related to utilities and service systems:

- **RCM-UTIL-1 (Fire Water Flow):** The Project Applicant is required to consult with the LADBS and LAFD to determine fire flow requirements for the proposed project and will contact a Water Service Representative at the LADWP to order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant is required to pay for such upgrades, which would be constructed by either the Applicant or LADWP.
- **RCM-UTIL-2 (Landscape):** Development is required to comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- **RCM-UTIL-3 (Sewer Connection Regulations):** In compliance with LAMC Section 64.17, all project development would be required to obtain a sewer connection permit from the Board of Public Works to construct, alter, or repair any house connection sewer or any portion of any house connection sewer and comply with all regulations for sewer connection.
- **RCM-UTIL-4 (Designated Recycling Area):** In compliance with LAMC, development is required to provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.
- **RCM-UTIL-5 (Commercial/Multi-family Mandatory Recycling):** In compliance with AB341, recycling bins are required to be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins are required to

be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The project Applicant is required to only contract for waste disposal services with a company that recycles solid waste in compliance with AB341.

- **RCM-UTIL-6 (Construction Waste Recycling):** In order to meet the diversion goals of the City's Solid Waste Integrated Resources Plan (SWIRP), which seeks a diversion rate of 90 percent by the year 2025, the Applicant is required to salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the LAMC, the General Contractor is required to utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.
 - a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Project development would be concentrated in urban areas that are served by existing utilities infrastructure, including potable water, wastewater, stormwater drainage, electrical power, natural gas, and telecommunications facilities.

Water Supply

Project development would require water for a variety of activities such as landscaping, controlling fugitive dust, and providing potable water to workers during construction and residents of the future development. As new housing development occurs incrementally throughout the City, upgrades to water conveyance facilities may be required. The precise location and connection would need to be determined at the time development is proposed. Should any new connections or upgrades be required, such upgrades would be subject to subsequent environmental review. Any future line size modifications or connections would be designed in accordance with applicable provisions of the LAMC and to the satisfaction of the City Engineer. Project development would be required to comply with the regulations described in RCM-GHG-1 through RCM-GHG-4, as discussed in Section 8, *Greenhouse Gas Emissions*, and RCM-UTIL-2 (Landscape). However, increased development density has the potential to impact the capacities of local utilities infrastructure, which may require the expansion or construction of new facilities. Therefore, this issue will be studied further in an EIR.

Wastewater Generation

Wastewater treatment would be provided by existing infrastructure within the City. However, the amount of wastewater generated by project development is not known at this time and may exceed existing capacity. Project development would be required to comply

with the regulations to reduce water consumption. The Hyperion Water Reclamation Plant (HWRP) is located in the community of Playa Del Rey and has a treatment capacity of 450 mgd. The HWRP was designed to accommodate a maximum peak wet weather flow of 800 mgd. Project development has the potential to impact the capacities of the City's wastewater treatment conveyance systems, which may require the expansion or construction of new infrastructure or facilities. Therefore, this issue will be studied further in an EIR.

Stormwater

Project development would likely include stormwater infrastructure to meet new demand. Although the new infill development would be located in an urban area that is served by existing stormwater drainage systems, the addition of new housing may exceed capacity of infrastructure. Future project development would be required to comply with RCM-GHG-1 through RCM-GHG-4, as discussed in Section 8, *Greenhouse Gas Emissions*, and RCM-UTIL-2 (Landscape) to reduce water consumption and install necessary stormwater facilities. However, project development has the potential to impact the capacities of local utilities infrastructure, which may require the expansion or construction of new facilities. Therefore, this issue will be studied further in an EIR.

Electricity, Natural Gas, and Telecommunications

Electricity is currently provided to the City by LADWP and natural gas service is provided by Southern California Gas. Telecommunications services would be provided by AT&T, SBC Telecom, or other providers, at the discretion of future tenants. Telecommunications are generally available in the project area, and facility upgrades would not likely be necessary.

Operation and occupancy of project development would result in energy demand from the residences and transportation fuel from new vehicle trips. It is anticipated that the proposed project would increase demand for electricity, and natural gas, compared to existing conditions. As such, project development has the potential to impact the capacities of local utilities infrastructure, which may require the expansion or construction of new facilities. Therefore, this issue will be studied further in an EIR.

As discussed under *Safety Element Update* of this section, the potential impacts related to existing utilities infrastructure (i.e., potable water, wastewater, stormwater drainage, electrical power, natural gas, and telecommunications facilities) under the Safety Element Update will also be further analyzed in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

LADWP is responsible for providing water supply to the City while complying with County, State, and federal regulations. According to the City’s 2015 Urban Water Management Plan (UWMP), the primary LADWP sources of water supplies are water purchased from the Metropolitan Water District of Southern California (MWD), imported surface water, and local groundwater. Recycled water projects are progressing and expected to comprise a greater portion of LADWP water supply in the future. Overall, these sources of water provide the necessary water to meet LADWP’s water supply needs. In 2015, total water demand was 513,540 AFY. Table 9 through Table 11 show the 2015 UWMP water demand and supply projections from 2020 to 2040 based on normal weather conditions, single dry year conditions, and multiple dry year conditions (LADWP 2016).

The Los Angeles Aqueduct (LAA) has historically been the primary source of the City’s water supply. In recent years, however, the amount of water supplies from the LAA has been limited due to environmental concerns, and the City’s water supply relied heavily (average of 57 percent in recent years) on the purchased water from MWD delivered from the Colorado River or the Sacramento-San Joaquin Delta. Local ground water has been a reliable water source, providing an average of 12 percent of the total water supply, but there have been concerns in recent years due to declining groundwater level and contamination issues. The City’s recycled water supply is limited to specific projects in the City at this time (LADWP 2016).

Table 9 LADWP Reliability Assessment for Average Weather Conditions

Demand and Supply Projections (in acre-feet)	Average Year (FY2014-15)				
	Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Total Water Demand ¹	611,800	644,700	652,900	661,800	675,700
pLAn Water Demand Target	485,600	533,000	540,100	551,100	565,600
Existing/Planned Supplies					
Conservation (Additional Active ² and Passive ³ after FY 14/15)	125,800	110,900	111,600	109,100	108,100
Los Angeles Aqueduct ⁴	275,700	293,400	291,000	288,600	286,200
Groundwater ⁵ (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
Groundwater Replenishment	0	30,000	30,000	30,000	30,000

Demand and Supply Projections (in acre-feet)	Average Year (FY2014-15) Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Stormwater Capture					
Stormwater Reuse (Harvesting)	400	800	1,200	1,600	2,000
Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	536,370	578,770	587,470	601,170	600,770
MWD Water Purchases					
With Existing/Planned Supplies	75,430	65,930	65,430	60,630	74,930
Total Supplies	611,800	644,700	652,900	661,800	675,700
Potential Supplies					
Water Transfers ⁶	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
MWD Water Purchases					
With Existing/Planned/Potential Supplies	35,430	25,930	25,430	20,630	34,930
Total Supplies	611,800	644,700	652,900	661,800	675,700

¹ Total Demand with existing passive conservation.

² Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-15.

³ Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAN.

⁴ LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate change impact.

⁵ Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

⁶ Potential water transfer occurs in dry years with stored water acquired in average and wet years.

FY: fiscal year; AFY: acre-feet per year; MWD: Metropolitan Water District of Southern California; LADWP: Los Angeles Department of Water and Power

Source: LADWP 2016

Table 10 LADWP Reliability Assessment for Single Dry Year Weather Conditions

Demand and Supply Projections (in acre-feet)	Single Dry Year (FY2014-15) Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Total Water Demand ¹	642,400	676,900	685,500	694,900	709,550
pLAN Water Demand Target	485,600	533,000	540,100	551,100	565,600
Existing/Planned Supplies					
Conservation (Additional Active ² and Passive ³ after FY 14/15)	156,700	143,700	145,100	143,500	143,500
Los Angeles Aqueduct ⁴	32,200	51,900	51,400	51,000	50,600
Groundwater ⁵ (Net)	112,670	110,670	106,670	114,670	114,070

Demand and Supply Projections (in acre-feet)	Single Dry Year (FY2014-15) Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Recycled Water					
- Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
- Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
- Stormwater Reuse (Harvesting)	100	200	300	300	400
- Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	323,470	369,470	380,470	396,670	398,970
MWD Water Purchases					
With Existing/Planned Supplies	318,930	307,430	305,030	298,230	310,530
Total Supplies	642,400	676,900	685,500	694,900	709,500
Potential Supplies					
Water Transfers ⁶	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
MWD Water Purchases					
With Existing/Planned/Potential Supplies	278,930	267,430	265,030	258,230	270,530
Total Supplies	642,400	676,900	685,500	694,900	709,500

¹ Total Demand with existing passive conservation.

² Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-15.

³ Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAN.

⁴ LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate change impact.

⁵ Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

⁶ Potential water transfer occurs in dry years with stored water acquired in average and wet years.

FY: fiscal year; AFY: acre-feet per year; MWD: Metropolitan Water District of Southern California; LADWP: Los Angeles Department of Water and Power

Source: LADWP 2016

Table 11 LADWP Reliability Assessment for Multiple Dry Year Weather Conditions

Demand and Supply Projections (in acre-feet)	Multiple Dry Year (FY2014-15)				
	Fiscal Year Ending June 30				
	2020	2025	2030	2035	2040
Total Water Demand ¹	642,400	676,900	685,500	694,900	709,550
pLAN Water Demand Target	485,600	533,000	540,100	551,100	565,600
Existing/Planned Supplies					
Conservation (Additional Active ² and Passive ³ after FY 14/15)	156,700	143,700	145,100	143,500	143,500
Los Angeles Aqueduct ⁴	33,500	53,200	52,800	52,400	51,900
Groundwater ⁵ (Net)	112,670	110,670	106,670	114,670	114,070
Recycled Water					
- Irrigation and Industrial Use	19,800	29,000	39,000	42,200	45,400
- Groundwater Replenishment	0	30,000	30,000	30,000	30,000
Stormwater Capture					
- Stormwater Reuse (Harvesting)	100	200	300	300	400
- Stormwater Recharge (Increased Pumping)	2,000	4,000	8,000	15,000	15,000
Subtotal	324,770	370,770	381,870	398,070	400,270
MWD Water Purchases					
With Existing/Planned Supplies	317,630	306,130	303,630	296,830	309,230
Total Supplies	642,400	676,900	685,500	694,900	709,500
Potential Supplies					
Water Transfers ⁶	40,000	40,000	40,000	40,000	40,000
Subtotal	40,000	40,000	40,000	40,000	40,000
MWD Water Purchases					
With Existing/Planned/Potential Supplies	277,630	266,130	263,630	256,830	269,230
Total Supplies	642,400	676,900	685,500	694,900	709,500

¹Total Demand with existing passive conservation.

²Cumulative hardware savings since late 1980s reached 118,034 AFY by 2014-15.

³Additional non-hardware conservation required to meet water use reduction goals set in the Sustainable City pLAN.

⁴LADWP anticipates conserving 20,000 AFY of water usage for dust mitigation on Owens Lake after the Master Project is implemented in FY 2023-24. Los Angeles Aqueduct supply is estimated to decrease 0.1652% per year due to climate change impact.

⁵Net GW excludes Stormwater Recharge and Groundwater Replenishment supplies that contribute to increased pumping. The LADWP Groundwater Remediation project in the San Fernando Basin is expected in operation in 2021-22. Storage credit of 5,000 AFY will be used to maximize pumping in 2019-20 and thereafter. Sylmar Basin production will increase to 4,170 AFY from 2015-16 to 2038-39 to avoid the expiration of stored water credits, then go back to its entitlement of 3,570 AFY in 2039-40.

⁶Potential water transfer occurs in dry years with stored water acquired in average and wet years.

FY: fiscal year; AFY: acre-feet per year; MWD: Metropolitan Water District of Southern California; LADWP: Los Angeles Department of Water and Power

Source: LADWP 2016

Based on 2012 SCAG demographic data, the 2015 UWMP projects that the service area population would increase by approximately 423,900 new residents over the course of 25 years post 2015. Per the 2015 UWMP, current water supplies, planned future water conservation efforts, and planned future water supplies will enable LADWP to reliably provide water that meets the demands of the City for a 25-year planning horizon (LAWDP 2016). The 2015 UWMP indicates that water deliveries to the City totaled 513,540 AFY in 2015. Projected total water demand for the City under average year conditions for year 2040 is 675,700 AFY. Projected total water demand for the City for 2040 under single/multiple dry years conditions is 709,500 AFY. The 2015 UWMP projects an increase of 162,160 AFY (31.6 percent) during normal weather conditions and 195,960 AFY (38.2 percent) in water demand between 2015 and 2040 under single/multiple dry year conditions.

Project development would be required to comply with the City's water conservation ordinances and State policies, such as the Water Efficiency Requirements Ordinance, Los Angeles Green Building Code, and the latest CALGreen requirements. Compliance with these regulations would require new buildings to install water conservation fixtures, such as ultra-low-flush toilets, urinals, taps, and showerheads, and plumbing fixtures in order to obtain building permits in the City of Los Angeles. Meanwhile, existing buildings that could be converted to residential use under the Housing Element Update would be required to comply with the Existing Buildings Energy and Water Efficiency Program. The content of the Housing Element Update would not repeal, amend, or conflict with existing regulations and uniformly applied development regulations, such as the CALGreen and Water Efficiency Requirements ordinances, intended to avoid increased water demand effects.

Nonetheless, project development would involve up to 429,261 housing units in the City. The Housing Element Update would accommodate forecasted population growth, in addition to relieve overcrowding and existing cost burden, while also providing housing for the existing unsheltered and unhoused population. However, the project does have the potential to result in additional population growth beyond that forecasted by SCAG. Therefore, impacts to the City's water supply from project development will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- c. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Project development would be concentrated in urban areas served by existing wastewater treatment infrastructure operated by the City of Los Angeles. The City of Los Angeles sewer system includes more than 6,600 miles of sewers serving a population of approximately four million residents. The Los Angeles sewer system is comprised of three systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. Of these, the Hyperion Sanitary Sewer System is the largest of the City's sewer systems. The Hyperion Water Reclamation Plant (HWRP) is located in the community of Playa Del Rey and has a treatment capacity of 450 mgd. The HWRP was designed to accommodate a maximum peak wet weather flow of 800 mgd. However, increased development density has the potential to impact the capacities of local utilities infrastructure. Therefore, this issue will be studied further in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

The management of solid waste in Los Angeles involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City has enacted numerous waste reduction and recycling programs in order to comply with the California Integrated Waste Management Act (AB 939), which require every city in California to divert at least 50 percent of its annual waste by the year 2000, and be consistent with AB 341, which sets a 75 percent recycling goal for California by 2020. As tracked by the City’s Zero Waste Progress Report, the City achieved a landfill diversion rate of 76.4 percent as of 2012 (City of Los Angeles Sanitation 2013). The City of Los Angeles has also prepared a Solid Waste Integrated Resources Plan (SWIRP), which contains long-term goals, objectives and policies for solid waste management for the City. It specifies that the City’s Zero Waste goal is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 (LASAN 2013). The regulations described in RCM-UTIL-4 through RCM-UTIL-6 require future projects to implement construction and operational recycling practices to reduce waste and help meet the City’s Zero Waste goal.

As discussed in *Proposed Project*, project development involves the potential construction and operation of between 419,261 and 429,261 housing units. As shown in Table 12, project development would increase the amount of solid waste generated in the City by approximately 2,624 tons per day, or 957,760 tons per year, above existing conditions. This calculation does not take into consideration current and planned City programs to divert solid waste from landfills. For example, compliance with LAMC Section 66.32 would ensure that at least 75 percent of the demolition and construction waste generated by development under the proposed project would be diverted from landfills serving the City. In addition, the City will continue to implement waste reduction policies set forth by the RENEW LA Plan and the Framework Element.

Table 12 Projected Solid Waste Generation in the City

New Dwelling Units (DU)	Daily Waste Generation Rate	Daily Waste Generation (lbs)	Daily Waste Generation (tons)	Annual Waste Generation (tons)
429,261	12.23 lbs/du	5,249,862	2,624	957,760

Notes: DU – dwelling unit; lbs – pounds

Source: CalRecycle 2020. Residential rates were originally taken from the 2006 L.A. CEQA Thresholds Guide; the rate for public facilities was originally taken from the Draft EIR for the Central Commercial Redevelopment Project.

Table 13 lists the landfills currently serving the City of Los Angeles including their permitted capacity, remaining capacity, permitted daily intake capacity, and the average daily volume of solid waste received at each landfill (County of Los Angeles 2019). Based on the Los Angeles County Countywide Integrated Waste Management Plan (CIWMP) 2018 Annual Report, available capacity from Nonhazardous Solid Waste Landfills is expected for the next

15 years (CIWMP projections extend to 2033) and no new landfills are expected to be permitted during that time (County of Los Angeles 2019).

Table 13 Solid Waste Facilities Serving the City of Los Angeles

Facility Name	Landfill Site Location	Remaining Capacity (tons)¹	Permitted Daily Intake capacity (tons/day)	2018 Average Disposal (tons/day)
Antelope Valley	Palmdale	12,001,395	3,600	1,677
Calabasas	Agoura	4,908,186	3,500	1,030
Chiquita Canyon ²	Castaic	59,752,250	12,000	2,307
Lancaster	Lancaster	10,231,322	3,000	376
Sunshine Canyon	Los Angeles	65,274,183	12,100	7,012
Scholl Canyon	Glendale	4,294,664	3,400	929
Southeast Resource Recovery Facility/b/	Long Beach	N/A	2,400	1,196
Azusa Land Reclamation	Azusa	57,716,118	6,500	1,358
Totals		214,178,118	46,500	15,885

¹Remaining capacity as of June 2019.

Source: County of Los Angeles 2019

As show in Table 8, the combined daily intake capacity of landfills serving the City of Los Angeles is 46,500 tons per day and the average disposal intake is 15,885 tons per day. Therefore, available capacity (30,615 tons per day) can accommodate the estimated 2,624 tons per day of solid waste that would be generated by project development. Even assuming no diversion, the increase in generated solid waste associated with project development would represent about eight percent of the total available daily capacity.

With regard to the solid waste increase associated with project development, the handling of all debris and waste generated during construction would be subject to the State’s requirements under the California Integrated Waste Management Act AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project Site. Construction of new development projects may also involve site preparation activities that would generate waste materials; however, construction would be temporary and individual developers would be required to comply with the City’s Construction and Demolition (C&D) Waste Recycling Ordinance. All construction and demolition waste would be required to be taken to a certified C&D waste processor. These requirements would maximize waste stream diversions and help reduce solid waste disposal impacts and the City will continue to coordinate with the County regarding solid waste disposal capacity. Impacts related to the generation of solid waste would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

A significant impact could occur if the Housing Element Update would conflict with any statutes and regulations governing solid waste. In compliance with State legislation, any project development would be required to implement a Solid Waste Diversion Program and divert at least 75 percent of the solid waste generated from the applicable landfill site. In addition, project development would comply with federal, State, and local statutes and regulations related to solid waste, such as the California Waste Integrated Waste Management Act (AB 939), the SWIRP, and the City's recycling program. Therefore, impacts related to conflict with statutes and regulations governing solid waste would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to transportation, rather the

Safety Element Update to improve policies and regulations associated with emergency response or evacuation plans and wildland fires.

Housing Element Update

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Areas at risk for wildfire in the City are concentrated around the undeveloped hillsides and mountainous areas, such as the Santa Monica Mountains. The only State Responsibility Areas in the City are limited to a small area near the northeastern boundary of City (CalFIRE 2011). These areas are primarily developed with low-density, single-family residential uses. While the geographic distribution of development would largely occur in areas of the City that are currently zoned for multi-family residential and commercial development in proximity to transit, it is possible that individual project development sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of a Very High Fire Hazard Severity Zones (VHFHSZ). However, such development is not likely or anticipated on a level that would significantly conflict with an adopted emergency response plan or emergency evacuation plan.

As discussed in Section 9, *Hazards and Hazardous Materials*, construction activities could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way. However, temporary construction barricades or other obstructions used for project development that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. Implementation of these plans would ensure that future development under the proposed project would not impair or physically interfere with adopted emergency response or evacuation procedures.

Increased housing development density in urban areas of the City under the proposed project could result in additional traffic within area roadways. However, in the event of a wildfire, implementation of the County's ERP would coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient organization capable of managing emergency evacuation for affected areas (see impact discussion *f.* under Section 9, *Hazards and Hazardous Materials*). The Los Angeles Department of Transportation and LAFD would be responsible for ensuring that future development does not impair adopted emergency response or evacuation plans. As part of standard development procedures, future housing development plans would be submitted for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City regulations. Furthermore, the Housing Element Update would not introduce any features or policies that would preclude implementation of or alter these policies or procedures in any way or encourage housing development in VHFHSZ. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Portions of the City are subject to wildland fire risk, primarily in areas where single-family residential development abuts the undeveloped hillsides of the Santa Monica Mountains (City of Los Angeles 1996). Properties located within VHFHSZ as mapped by the CalFIRE and Fire Brush Clearance Zones are required to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, compliance with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD hazardous vegetation clearance requirements pursuant to the Los Angeles Fire Code (2017). The undeveloped portions of the Santa Monica Mountains are generally designated for Open Space and development opportunities in these areas are limited. Development opportunities in the hillside areas are further limited by single-family residential density regulations, slope density restrictions, and the topography.

In addition, the Housing Element Update would incentivize new housing development on urban infill sites within areas well served by high quality public transit. Therefore, project development under the proposed project would direct growth away from low-density neighborhoods, including hillside areas at risk of the spread of wildfire and subsequent downslope flooding and landslides. As such, development is not likely to expose project occupants to the uncontrolled spread of a wildfire or other associated risks including, but not limited to, flooding, landslides, and instability. Nonetheless, all development would be subject to applicable response plans and would be required to comply with the vegetation management, building materials, and emergency access requirements discussed under impact discussion *a.* of this section. In the event of a wildfire, implementation of the County's ERP would coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient organization capable of managing emergency evacuation for affected areas (see impact discussion *f.* under Section 9, *Hazards and Hazardous Materials*). Furthermore, project development would be required to be constructed according to the UBC requirements for fire-protection and would be subject to review and approval by the LAFD. The LAFD provides several fire developments services to the City related to enforcing codes concerning new construction and remodeling, including Fire Life Safety Plan Checks and Fire Life Safety Inspections.

Because the Housing Element Update would generally direct development away from the hillside areas with fire hazards and new development would be required to comply with fire safety provisions established by the Los Angeles Fire Code (2017), future development under the Housing Element Update would not pose a substantial risk to people or structures due to wildland fires. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The Housing Element Update would prioritize the development of new housing in urban areas of the City near existing high-quality public transit infrastructure. As such, the proposed project would not encourage development in the low-density residential areas subject to wildfire risk. Project development would occur in areas that are well-served by existing roadways and utilities infrastructure. The proposed project would not be anticipated to require additional roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk. As discussed in Section 16, *Transportation*, potential impacts related to the effective performance of the circulation system will be discussed in the EIR, as well as other transportation related issues, such as roads. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Does the project:

- | | | | | |
|--|---|---|---|---|
| <p>a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p> | ■ | □ | □ | □ |
| <p>b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p> | ■ | □ | □ | □ |
| <p>c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p> | ■ | □ | □ | □ |

Safety Element Update

In order to ensure compliance with state law, the City anticipates amending the Safety Element to formally integrate related long-range planning efforts. Furthermore, updates to the Safety Element would involve updates to safety policies and requirements to provide

consistency with the Housing Element Update, including those related to emergency response as part of the Local Hazard Mitigation Plan, which would provide guidance to minimize impacts associated with hazardous and unsafe conditions. Therefore, the Safety Element Update would not result in any adverse impacts related to mandatory findings of significance and would rather improve issues safety issues related to hazards and hazardous materials, transportation, and wildfires.

Housing Element Update

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Project development may involve alteration, intensification, and redistribution of land uses in the City of Los Angeles. As discussed in Section 4, *Biological Resources*, proposed changes could have the potential to have a substantial adverse effect on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations. As discussed in Section 5, *Cultural Resources*, Section 6, *Geology and Soils*, and Section 18, *Tribal Cultural Resources*, developments have the potential to impact historical, archaeological, paleontological, and tribal cultural resources. Since the Housing Element Update has the potential to degrade the quality of the environment, including plants, animals, and potential cultural and historical resources, this impact is potentially significant and will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

As discussed in Sections 1 through 20, the proposed project could result in significant impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and service systems. Potential cumulative impacts in these issue areas, for which potentially significant impacts have been identified, will be further analyzed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise. As discussed in Section 3, *Air Quality*, operation of project development could potentially generate criteria pollutant emissions exceeding the SCAQMD regional thresholds for operation and construction activities and may expose sensitive receptors in the City to substantial pollutant concentrations. As discussed in Section 9, *Hazards and Hazardous Materials*, there is the potential for future construction to involve the demolition or alteration of structures that could lead to a significant hazard to the public or environment by exposing future residents to potential on-site contamination if not properly identified. Therefore, since the Housing Element Update could potentially have harmful environmental effects that could affect humans either directly or indirectly, impacts would be potentially significant and these issues will be discussed in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

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