



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



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October 27, 2020

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

**HEARING ON THE AFFORDABLE HOUSING PRESERVATION ORDINANCE
PROJECT NO. PRJ2020-000307
ADVANCE PLANNING CASE NO. RPPL2020001473
ENVIRONMENTAL ASSESSMENT NO. RPPL2020001474
(ALL SUPERVISORIAL DISTRICTS) (3-VOTES)**

SUBJECT

The recommended actions are to approve a revised Addendum to a previously certified Final Environmental Impact Report (EIR) and the Affordable Housing Preservation Ordinance (Ordinance), which amends Title 8 (Consumer Protection, Business and Wage Regulations), Title 21 (Subdivisions) and Title 22 (Planning and Zoning) of the Los Angeles County Code (County Code). The proposed Ordinance requires the replacement of affordable rental housing that is demolished, vacated, or converted from rental to for-sale; requires notification of planned condominium conversions to housing organizations qualified to preserve affordable rental housing; and facilitates the ongoing operation of existing mobilehome parks in the unincorporated areas of Los Angeles County. A project summary is included as Attachment 1, and the proposed Ordinance is included as Attachment 2.

IT IS RECOMMENDED THAT THE BOARD, AFTER THE PUBLIC HEARING:

1. Certify that the revised Addendum to the EIR for the General Plan Update (Environmental Assessment No. RPPL2020001474) (Attachment 4), has been completed in compliance with the California Environmental Quality Act (CEQA) and reflects the independent judgment and analysis of the County of Los Angeles

(County); find that the Board of Supervisors (Board) has reviewed and considered the information contained in the revised Addendum with the EIR prior to approving the project, and approve the revised Addendum;

2. Indicate its intent to approve the Project (Advance Planning Case No. RPPL2020001473), as recommended by the Regional Planning Commission (RPC), and with modifications as proposed by the Department of Regional Planning staff (staff); and
3. Instruct County Counsel to prepare the necessary final documents for the Project amending Title 8, Title 21 and Title 22 of the County Code and bring them back to the Board for their consideration.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of the recommended actions will approve the revised Addendum to the previously certified General Plan Update EIR as prepared for this ordinance and allow the County to preserve the supply of existing affordable housing in the unincorporated areas of Los Angeles County.

In response to the ongoing local and statewide housing crisis, the Board approved a motion in February 2018 instructing staff to prepare an ordinance to preserve existing affordable housing units, both income-restricted as well as unsubsidized “naturally occurring affordable housing,” that considers a variety of anti-displacement strategies, such as the regulation of condominium conversions and mobilehome park closures, and one-for-one replacement or “no net loss” policies.

The preservation of affordable housing is a key strategy in the County’s affordable housing and homelessness prevention efforts. The proposed Ordinance complements the County’s initiatives on rent stabilization and tenant protections, as well as efforts to target funds for affordable housing to areas at higher risk of displacement. The proposed Ordinance also ensures that the County is in compliance with State laws, such as Senate Bill (SB) 330, which ensure no net loss in a jurisdiction’s affordable housing supply.

The stock of affordable housing that is at risk of becoming market-rate is significant. The County’s 2014-2021 Housing Element identified 582 income-restricted rental units at risk of conversion to market-rate development by 2024. Staff’s analysis of Census data suggests that there are over 15,000 non-income-restricted, “naturally occurring” affordable rental units in the unincorporated areas. There are also nearly 8,300 mobilehome park spaces in the unincorporated areas, which are an important source of naturally occurring affordable housing.

In developing the proposed Ordinance, staff worked with consultants to prepare two studies: a nexus and feasibility study for an Affordable Housing Replacement Fee

(Attachment 9), and a land use policy study focused on mobilehome parks (Attachment 10).

The Affordable Housing Replacement Fee study calculates the maximum fee that can be charged to a developer as an alternative to constructing replacement affordable rental housing. These fees are included in the proposed Ordinance for nonresidential projects and certain land divisions.

The Mobilehome Park Policy study includes a set of policy recommendations for near- and long-term consideration, based on best practices among California jurisdictions for the preservation of mobilehome parks as naturally occurring affordable housing.

On July 29, 2020, the RPC held a public hearing and voted unanimously to recommend approval of the proposed Ordinance with revisions. On August 5, 2020, the Airport Land Use Commission (ALUC) held a public hearing and found that the proposed Ordinance is consistent with the County Airport Land Use Plan, the General William J. Fox Airfield Land Use Compatibility Plan, and the Brackett Field Airport Land Use Compatibility Plan. A summary of RPC and ALUC proceedings is included as Attachment 6. The RPC's resolution and the ALUC's findings and order are included as Attachments 7 and 8, respectively.

Key Components

The proposed Ordinance preserves the supply of affordable housing by requiring the replacement of affordable rental housing that is demolished, vacated, or converted from rental to for-sale; requiring notification of planned condominium conversions to housing organizations qualified to preserve affordable rental housing; and facilitating the ongoing operation of existing mobilehome parks. The proposed Ordinance includes the following components:

Affordable Housing Replacement:

Applicability: In general, projects that are subject to the replacement requirements for protected units (below) include the following:

- New construction of any principal building;
- A change of a principal residential use to another principal use;
- A change in the number of dwelling units;
- A land division subject to Title 21 (Subdivisions) of the County Code; or
- Legalization of an existing unpermitted dwelling unit.

Exemptions: The proposed Ordinance also exempts certain project types from the affordable unit replacement requirements, such as the construction of a new single-family residence on a lot with no other principal buildings; a project in a Very High Fire Hazard Severity Zone, and a project in an area subject to a specific plan or policy with an affordable housing replacement requirement, among others.

Protected Units: A project must replace rental dwelling units on the site that are proposed to be or have been demolished, vacated, or converted from rental to for-sale. Rental dwelling units must be replaced if they are any of the following:

- Subject to a recorded covenant that restricts rents to levels that are affordable to moderate, lower, very low, or extremely low income households within the five years prior to application submittal;
- Rent-stabilized pursuant to County or State regulations within the five years prior to application submittal;
- Occupied by lower, very low, or extremely low income tenants within the five years prior to application submittal; or
- Withdrawn from rent or lease pursuant to Chapter 12.75 (commencing with Section 7060) of the California Government Code (known as the Ellis Act) within the 10 years prior to application submittal.

Affordability Requirements: Replacement units are required to be provided “like-for-like” (in at least the same number and for the same or lower household income levels), as reflected at the time of application submittal. If either the units or the site are vacant, but contained rental units within specified time periods, or if the household incomes are unknown, replacement units are required based on the methodology in State Density Bonus Law. In such cases, the number of affordable replacement units and the income levels are assumed to be the same as the proportion of extremely low, very low, and lower income renters in the unincorporated areas.

Tenure: Affordable replacement units must be provided as rental units, except for replacement units for income-restricted moderate-income units, which may be provided as income-restricted rental or for-sale units.

Affordability Duration: Rental replacement units are required to remain affordable in perpetuity, subject to a recorded covenant. For for-sale affordable replacement units, the initial sale is restricted to eligible buyers and requires an equity-sharing agreement with the County.

Offsite and Fee Alternatives: Affordable replacement units are required to be provided on-site unless they are counted toward an inclusionary housing requirement that is

providing off-site affordable set-aside units. A replacement fee is available for non-residential projects and land divisions that do not result in an increase in units.

Condominium Conversions:

At least 30 days prior to the filing of a tentative map for the conversion of rental dwelling units to condominiums, applicants must submit to the County Development Authority the property address, number of dwelling units proposed for conversion, monthly rent per unit, applicant contact information, and indicate whether the units are subject to the County's Rent Stabilization Ordinance, for the purposes of notification to housing organizations qualified to preserve affordable rental housing.

Mobilehome Parks:

The proposed Ordinance removes barriers to the continued operation of existing mobilehome parks, many of which predate the County's requirements for a Conditional Use Permit (CUP), and/or do not conform with current allowable density or development standards. The proposed Ordinance removes redundant requirements, clarifies how the use is permitted and how density and development standards may be modified, and provides more flexibility for mobilehome parks to be repaired and maintained.

The proposed Ordinance also waives planning and zoning filing fees for mobilehome parks, which can be a significant barrier for some mobilehome parks to keep their land use entitlements current.

ADDITIONAL STAFF RECOMMENDATIONS

For clarification purposes, and to ensure consistency with the pending Inclusionary Housing Ordinance and as directed by the RPC, the attached ordinance reflects staff revisions to the Ordinance heard by the RPC on July 29, 2020. In particular, the RPC directed staff to amend the proposed Ordinance to prioritize affordable replacement units to be located as close to the principal project as possible. The proposed Ordinance limits the option for off-site replacement to within one-quarter mile of the principal project site, or sites developed as part of a community land trust, for projects that are subject to an inclusionary housing requirement and are providing affordable replacement units off-site. In addition, to align with the pending Inclusionary Housing Ordinance, the proposed Ordinance requires affordability in perpetuity for affordable replacement rental units. These changes are shown in Attachment 3.

In addition, to be consistent with the County's guidelines for SB 743, effective July 1, 2020, staff revised the Addendum to the EIR for the General Plan Update to reference updated traffic impact analysis methods. These changes are shown in Attachment 5.

Implementation of Strategic Plan Goals

The proposed Ordinance supports the County's *Strategic Plan Goal I: Make Investments That Transform Lives; Objective I.1.5: Increase Affordable Housing Throughout L.A. County* by preserving the County's supply of existing affordable housing.

FISCAL IMPACT/FINANCING

Adoption of the proposed Ordinance will not result in any significant new costs to the Department of Regional Planning or other County departments and agencies.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The proposed Ordinance supports Goals 1, 3 and 7, as well as Policies 1.2, 3.1, 7.1 and 7.2 of the County's adopted and state-certified Housing Element, in that it will reduce regulatory barriers and facilitate the production and preservation of lower-cost housing throughout the unincorporated areas to increase housing choices for all economic segments of the population.

In addition to the public hearing conducted by the RPC on July 29, 2020, a public hearing before the Board is required pursuant to Section 22.232.040.B.1 of the County Code. Required notice (Attachment 11) has been given pursuant to the procedures and requirements set forth in Section 22.222.180 of the County Code. Additionally, more than 1,100 members of the public have been notified via email. The email notification list is included as Attachment 12.

ENVIRONMENTAL DOCUMENTATION

The Board certified the General Plan Update EIR on October 6, 2015 (State Clearinghouse No. 2011081042). The certified General Plan Update EIR is available at planning.lacounty.gov/generalplan/eir.

Based on the revised Addendum, the EIR, and other materials in the record, the County determines that the proposed Ordinance falls within the previously certified General Plan Update EIR as the Ordinance has no new significant environmental impacts; no substantial increase in the severity of previously identified significant effects; no mitigation measures or alternatives previously found infeasible and now feasible; and no mitigation measures or alternatives which are considerably different from those in the EIR. Thus, neither a subsequent nor supplemental EIR is required. However, some changes or additions are necessary to the EIR, making the revised Addendum the appropriate CEQA document for the proposed Ordinance.

There are no changes that require further review under CEQA.

The required fee, if any, to the California Department of Fish and Wildlife was paid for in conjunction with the previously certified EIR.

Upon your Board's approval of the proposed Ordinance, staff will file a Notice of Determination with the County Clerk in accordance with section 21152 of the California Public Resources Code.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

Approval of the proposed Ordinance will not significantly impact County services.

Should you have any questions, please contact Ayala Scott in the Housing Policy Section at (213) 974-6417 or ascott@planning.lacounty.gov.

Respectfully submitted,



AMY J. BODEK, AICP
Director of Regional Planning

AJB:BS:CC:TF:AS:el

Attachments:

1. Project Summary
2. Draft Ordinance
3. Draft Ordinance (redlined)
4. Addendum to the certified Los Angeles County General Plan Update Final Environmental Impact Report
5. Addendum to the certified Los Angeles County General Plan Update Final Environmental Impact Report (redlined)
6. Regional Planning Commission and Airport Land Use Commission Hearing Proceedings
7. Regional Planning Commission Resolution
8. Airport Land Use Commission Findings and Order
9. Los Angeles County Affordable Housing Replacement Fee Study
10. Los Angeles County Mobilehome Park Policy Study
11. Hearing Notice
12. Notification List (email)

c: Executive Office, Board of Supervisors
County Counsel

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Chief Executive Office
Public Works
Fire Department
County Development Authority

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**COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING**

PROJECT SUMMARY

PROJECT DESCRIPTION: Affordable Housing Preservation Ordinance: Proposed amendments to the Los Angeles County Code (Titles 8, 21, and 22) to preserve the existing supply of affordable housing in the unincorporated areas of Los Angeles County.

REQUEST: Approval and adoption of the Ordinance.

LOCATION: Countywide (unincorporated areas)

STAFF CONTACT: Ms. Ayala Scott at (213) 974-6417

RPC HEARING DATE(S): July 29, 2020

RPC RECOMMENDATION: Approval and recommendation to the Board to consider adoption of the Ordinance.

MEMBERS VOTING AYE: Commissioners Moon, Modugno, Smith, Louie, and Shell

MEMBERS VOTING NAY: None

MEMBERS ABSENT: None

MEMBERS ABSTAINING: None

KEY ISSUES: The Draft Ordinance amends Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code to repeal Chapter 8.48 (Condominium Conversions).

The Draft Ordinance amends Title 21 (Subdivisions) of the County Code to require that tentative map applications include documentation required to ensure compliance with affordable housing replacement and condominium conversion notification requirements in Title 22 and State laws regarding mobilehome park subdivisions.

The Draft Ordinance amends Title 22 (Planning and Zoning) of the County Code to:

- Require certain development projects to replace existing affordable rental dwelling units (including those that are rent-stabilized, deed-restricted, or occupied by lower, very low, or extremely low income households) that are demolished, vacated, or converted from rental to for-sale, with income-restricted affordable rental dwelling units;
- Provide flexibility in meeting the replacement requirement through off-site construction or the payment of a replacement fee in limited circumstances;
- Require notification of planned condominium conversions to organizations qualified to preserve affordable rental housing in order to provide an opportunity for such organizations to establish contact with the applicant and determine whether the property can be acquired and preserved as affordable rental housing;
- Simplify the permitting process for the continued operation, repair and maintenance of existing mobilehome parks that do not conform to General Plan or zoning requirements;
- Allow development standards for mobilehome parks to be modified through a Conditional Use Permit without requiring a Variance; and
- Waive planning and zoning filing fees for mobilehome parks.

MAJOR POINTS FOR:

The Draft Ordinance will preserve the County's supply of affordable housing, which is a key strategy in the County's affordable housing and homelessness prevention efforts.

The Draft Ordinance complements the County's initiatives on rent stabilization and tenant protections, as well as efforts to target funds for affordable housing to areas at higher risk of displacement.

The Draft Ordinance reduces barriers to the

continued operation, repair and maintenance of existing mobilehome parks, which are a significant source of affordable housing in unincorporated areas.

MAJOR POINTS AGAINST:

The Draft Ordinance is not comprehensive enough in that the requirements to replace affordable housing are not triggered solely by the substantial rehabilitation of existing units.

The Draft Ordinance does not provide enough flexibility for developers to replace affordable units off-site or through payment of a fee, or replace fewer units in exchange for deeper affordability of replacement units.

ORDINANCE NO. _____

An ordinance amending Title 8 – Consumer Protection, Business and Wage Regulations, Title 21 – Subdivisions, and Title 22 – Planning and Zoning of the Los Angeles County Code to establish an Affordable Housing Preservation Ordinance in the unincorporated areas of Los Angeles County.

The Board of Supervisors of the County of Los Angeles ordains as follows:

SECTION 1. Chapter 8.48 is hereby deleted in its entirety.

SECTION 2. Section 21.40.110 is hereby amended to read as follows:

21.40.110 Matters ~~r~~Required to ~~e~~Complete ~~s~~Submittal and ~~f~~Filing.

A. For a tentative map to be deemed submitted and filed, the following matters must be completed and received:

...

3. The fees paid in accordance with Section 21.62.080.

4. All documentation required, as applicable, pursuant to Chapter 22.119 (Affordable Housing Replacement), Section 22.140.680 (Condominium Conversions), and sections 66427.4 through 66427.5 of the California Government Code.

...

SECTION 3. Section 21.44.050 is hereby amended to read as follows:

21.44.050 Matters ~~r~~Required for ~~s~~Submittal.

At the time of submittal of the final tract map or parcel map, or prints thereof, the following matters shall be submitted to the county engineer or the Department of Regional Planning, as specified, as an aid in the processing of the final maps:

...

F. Fees paid to the Department of Regional Planning in accordance with Chapter 22.268, if applicable.

SECTION 4. Section 22.02.055 is hereby added to read as follows:

22.02.055 Applicability of Affordable Housing Replacement.

No approvals shall be issued under this Title 22 without replacement of affordable housing units when required pursuant to Chapter 22.119 (Affordable Housing Replacement).

SECTION 5. Section 22.14.010 is hereby amended to read as follows:

22.14.010 A.

...

Affordable housing and senior citizen housing. The following terms are defined for the purposes of Chapter 22.119 (Affordable Housing Replacement), Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), Chapter 22.128 (Additional Affordable Housing Streamlining), Chapter 22.130 (Motel Conversions Streamlining), and Chapter 22.166 (Housing Permits):

...

Affordable rent. As defined in ~~§~~section 50053 of the California Health and Safety Code.

Affordable replacement units. Dwelling units reserved for extremely low, very low, lower or moderate income households provided pursuant to Chapter 22.119 (Affordable Housing Replacement).

...

Income. See "Income" for the following:

Area median income.

Extremely low income.

Lower income.

Moderate income.

Middle income.

Income-restricted units. This term includes "affordable housing set-aside" and "affordable replacement units."

...

SECTION 6. Section 22.14.030 is hereby amended to read as follows:

22.14.030 C.

...

Conditional use. Uses which because of characteristics peculiar to them, or because of size, technological processes, or types of equipment, or because of their location with reference to surroundings, street or highway width, traffic generation, or other demands on public services, require discretionary consideration relative to

placement at specific locations in the zones where classified to ensure proper integration with other existing or permitted uses in the same zones.

Condominium conversion. The conversion of rental dwelling units to condominiums, as defined in section 4125 of the California Civil Code, that are dwelling units.

...

SECTION 7. Section 22.14.130 is hereby amended to read as follows:

22.14.130 M.

...

Mixed use development. A development that combines residential and commercial uses, unless otherwise specified.

Mobilehome. As defined in ~~S~~section 18008, or a manufactured home as defined in section 18007, of the California Health and Safety Code. This term includes "supportive housing" and "transitional housing."

...

SECTION 8. Section 22.22.030 is hereby amended to read as follows:

22.22.030 Land Use Regulations for Zones M-1, M-1.5, M-2, and M-2.5.

...

C. Use regulations.

1. Principal Uses. Table 22.22.030-B, below, identifies the permit or review required to establish each principal use.

TABLE 22.22.030-B: PRINCIPAL USE REGULATIONS FOR INDUSTRIAL ZONES					
	M-1	M-1.5	M-2	M-2.5	Additional Regulations
...					
Trap ranges	CUP	CUP	CUP	CUP	
<u>Residential uses</u>					
<u>Mobilehome parks</u> ²⁰	<u>CUP</u>	-	<u>CUP</u>	-	<u>Section 22.140.370</u>
...					
Notes: ... <u>20. Where use is existing and legal nonconforming.</u>					

...

SECTION 9. Chapter 22.119 is hereby added to read as follows:

Chapter 22.119 AFFORDABLE HOUSING REPLACEMENT

Sections:

22.119.010 Purpose.

22.119.020 Definitions.

22.119.030 Applicability.

22.119.040 Exemptions.

22.119.050 Requirements.

22.119.010 Purpose.

The purpose of this Chapter is to preserve the supply of affordable housing and require affordability of replacement dwelling units.

22.119.020 Definitions.

Specific terms used in this Chapter are defined in Division 2 (Definitions), under "Affordable housing and senior citizen housing."

22.119.030 Applicability.

Except as otherwise specified in this Chapter, the provisions of this Chapter, in conjunction with Chapter 22.166 (Housing Permits), apply to any of the following:

- A. New construction of any principal building;
- B. A change of a principal residential use to another principal use;
- C. A change in the number of dwelling units;
- D. A land division subject to Title 21 (Subdivisions) of the County Code; or
- E. Legalization of an existing unpermitted dwelling unit.

22.119.040 Exemptions.

The following are exempt from the requirements of this Chapter:

- A. New construction of a single-family residence on a lot with no other principal uses or structures;
- B. New construction or legalization of accessory dwelling units or junior accessory dwelling units;
- C. Conversion to resident ownership of all rented spaces in a mobilehome park;
- D. Addition of mobilehome spaces or mobilehomes in a mobilehome park;
- E. A lease project as defined in Section 21.08.090 (Lease project) in Title 21 (Subdivisions) of the County Code;
- F. A project in a Very High Fire Hazard Severity Zone, as depicted in the General Plan;

G. A project in an area subject to a specific plan or policy with an affordable housing replacement requirement.

22.119.050 Requirements.

A. Dwelling units that are proposed to be or have been demolished, vacated, or converted from rental to for-sale, shall be replaced if they are permitted in the zone and are or were any of the following:

1. Subject to a recorded covenant that restricts rents to levels affordable to persons and families of moderate, lower, very low or extremely low income within the five years prior to application submittal;

2. A rent-stabilized unit pursuant to Section 8.52.030.F (Covered Rental Unit) in Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code or pursuant to section 1947.12 of the California Civil Code within the five years prior to application submittal;

3. Occupied by lower, very low or extremely low income tenants within the five years prior to application submittal;

4. Withdrawn from rent or lease in accordance with Chapter 12.75 (commencing with section 7060) of the California Government Code within the 10 years prior to application submittal.

B. The number and type of affordable replacement units shall be determined as follows:

1. The number of affordable replacement units for lower or very low income households shall be determined in accordance with section 65915 of the California Government Code;

2. Affordable replacement units for lower or very low income households shall be provided at the level of affordability determined in accordance with section 65915 of the California Government Code;

3. Affordable replacement units for extremely low income households shall be provided in at least the same number as existed on the site within the five years prior to application submittal, or in the same proportion of extremely low income renter households to all renter households within unincorporated County, as determined by the most recently available data from the United States Department of Housing and Urban Development's Comprehensive Housing Affordability Strategy database, if the income category is unknown for any of the following:

a. The current household in occupancy at the time of application submittal;

b. The last household in occupancy if a unit is unoccupied at the time of application submittal; or

c. The households at the highpoint of such units that existed in the five-year period preceding application, if the units have been vacated or demolished.

4. Dwelling units that are or were rent-stabilized pursuant to Section 8.52.030.F (Covered Unit) in Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code or section 1947.12 of the California Civil Code during

the five-year period prior to application submittal, and were or are occupied by households above lower income, shall be replaced with units affordable to lower, very low or extremely low income households;

5. At least the same total number of dwelling units and at least the same total number of bedrooms shall be replaced at the same or deeper level of affordability;

6. The required number of affordable replacement units shall not be reduced as the result of the deeper level of affordability of the affordable replacement units;

7. Affordable replacement units affordable to lower, very low or extremely low income households shall be rental dwelling units; and

8. Moderate income units. Units subject to a covenant that restricts rents to levels affordable to moderate income households shall be replaced with units that are affordable to households of moderate income or below moderate income. If they are replaced with units affordable to households of moderate income, the affordable replacement units may be rental or for-sale.

C. Inclusionary Housing or Density Bonus. Affordable replacement units required in this Chapter may count toward the affordable housing set-aside units required in Chapter 22.120 (Density Bonus) or Chapter 22.121 (Inclusionary Housing), if applicable.

D. Location of Affordable Replacement Units.

1. On-site. Except as specified in Subsection D.2, below, affordable replacement units shall be provided on-site.

2. Off-site.

a. Affordable replacement units may be provided off-site, subject to the following:

i. The affordable replacement units count toward the affordable housing set-aside units required in Chapter 22.121 (Inclusionary Housing);

ii. The required affordable housing set-aside units are provided off-site subject to all applicable provisions in Section 22.121.050.F (Location), except that the off-site parcel is located in an unincorporated area of the County and is either within one-quarter mile of the principal project or developed as part of a community land trust; and

iii. The construction of such units does not result in units requiring replacement pursuant to this Chapter.

b. Notwithstanding Subsection D.2.a.i, above, where the number of required affordable replacement units exceeds the number of required affordable housing set-aside units that are provided off-site, all affordable replacement units, including those that do not count toward the required affordable housing set-aside units, may be provided on the same off-site parcel, subject to the following:

i. The off-site parcel, with its developable acreage, zoning and General Plan land use designation, is sufficient to permit the construction of all affordable replacement units; and

ii. The requirements in Section 22.121.050.F.6, if the applicant partners with a third-party developer for the provisions of the affordable replacement units.

E. Notwithstanding Subsection D, above, a project that is subject to this Chapter may provide replacement in accordance with Chapter 22.268 (Affordable Housing Replacement Fee) if it is either of the following:

1. A non-residential development; or
2. A land division that:
 - a. Shall result in no increase in dwelling units; and
 - b. Is required to provide rental replacement units pursuant to

this Section.

F. Tenure. Affordable replacement units in a common interest development or a single-family residential subdivision shall be for-sale only.

G. Timing. All permits and entitlements, including the building permits, for the affordable replacement units shall be obtained prior to or concurrently with the permits and entitlements, including the building permits, for the non-replacement units.

H. Duration of Affordability.

1. Rental. The affordability term for rental replacement units shall be in perpetuity.

2. For-sale. The initial sale of the affordable replacement units shall be restricted to eligible buyers and shall require an equity-sharing agreement with the County, as described in Chapter 22.166 (Housing Permits).

I. Covenant and Agreement Required. A covenant and agreement ensuring the continued availability of affordable replacement units shall be recorded, pursuant to Section 22.166.070 (Covenant and Agreement).

SECTION 10. Section 22.120.040 is hereby amended to read as follows:

22.120.040 Eligibility.

Except as specified otherwise, a project is eligible for a density bonus, if it complies with the following:

...

B. Replacement Dwelling Units. The project shall replace ~~the any rental dwelling units that are or were occupied by lower or very low income households during the five-year period prior to application submittal, subject to the following~~exist(ed) on the site pursuant to Chapter 22.119 (Affordable Housing Replacement).

~~1. The affordable housing set aside is inclusive of the replacement dwelling units. The replacement dwelling units can be counted toward the affordable housing set aside;~~

~~2. Dwelling units requiring replacement include covenant-restricted units and non-covenant-restricted units;~~

~~3. The number of replacement dwelling units shall be determined in accordance with Section 65915 of the California Government Code;~~

~~4. Replacement dwelling units shall be provided at the level of affordability determined in accordance with Section 65915 of the California Government Code;~~

~~5. Each replacement dwelling unit shall have at least the same number of bedrooms as the dwelling unit being replaced;~~

~~6. Replacement dwelling units can be provided for households at a deeper level of affordability than required, but the required number of replacement dwelling units shall not be reduced as a result; and~~

~~7. Replacement dwelling units can be rental dwelling units or for-sale dwelling units, subject to the requirements of Subsection B.1 (Duration of Affordability) of Section 22.120.050.~~

C. Additional Requirements. The project shall be in compliance with one of the following:

1. Section 22.120.050 (Affordable Housing);
2. Section 22.120.060 (Senior Citizen Housing); ~~or~~
3. Section 22.120.070 (Land Donation); or
4. Section 22.120.075 (Mobilehome Park Density Bonus).

...

SECTION 11. Section 22.120.075 is hereby added to read as follows:

22.120.075 Mobilehome Park Density Bonus.

A. An existing legal nonconforming mobilehome park that exceeds the density permitted by the General Plan or the zone, and that is not receiving any other density bonus pursuant to this Chapter, shall be eligible for a density bonus which would deem the existing total number of mobilehome spaces as the maximum number of

dwelling units permitted on site, subject to the approval of an Administrative Housing Permit (Section 22.166.040) application.

B. Such application is not subject to Section 22.166.040.B.2.b or Section 22.166.040.C.3.

C. Such application is not eligible for any waivers or reductions of development standards provided in Section 22.120.090 (Waivers of Reductions of Development Standards).

SECTION 12. Section 22.120.090 is hereby amended to read as follows:

22.120.090 Waivers or Reductions of Development Standards.

A. Except as specified otherwise, a project that is subject to this Chapter shall receive waivers or reductions of development standards as follows:

...

SECTION 13. Section 22.121.050 is hereby amended to read as follows:

22.121.050 Affordable Housing Set-Aside.

...

C. Calculation.

...

2. Density Bonus. The affordable housing set-aside units required in Chapter 22.120 (Density Bonus) may count toward the affordable housing set-aside units required in this Chapter, in which case such units shall be:

a. Subject to Section 22.120.050.B.1 (Duration of Affordability);

and

b. Provided on-site.

3. Affordable Housing Replacement. Affordable replacement units required pursuant to Chapter 22.119 (Affordable Housing Replacement) may count toward the affordable housing set-aside units required in this Chapter.

4. Average Affordability. Average affordability is the sum of each unit set aside for extremely low income, very low income, lower income, moderate income, or middle income households multiplied by the income level, and divided by the total number of affordable housing set-aside units.

...

F. Location. The required affordable housing set-aside units shall be provided on-site, or off-site provided that:

...

5. The construction of the affordable housing set-aside units for the principal project does not result in units requiring replacement on the off-site parcel pursuant to Chapter 22.119 (Affordable Housing Replacement).

6. Where the applicant partners with a third-party developer for the provisions of the affordable housing set-aside units on the off-site parcel:

...

SECTION 14. Section 22.128.050 is hereby amended to read as follows:

22.128.050 Eligibility.

Except as specified otherwise, a project is eligible for streamlining if it complies with the following:

A. Public Funding. The project shall be publicly funded, or the applicant shall have applied for, or shall intend to apply for, public funding; and

B. Replacement Dwelling Units. The project shall replace ~~the rental dwelling units that are or were occupied by lower or very low income households pursuant to Section 22.120.040.B Chapter 22.119 (Affordable Housing Replacement Dwelling Units).~~

...

SECTION 15. Section 22.140.370 is hereby amended to read as follows:

22.140.370 Mobilehome Parks.

A. Applicability. This Section applies to mobilehome parks in all zones where allowed. ~~The Commission or Hearing Officer, in granting the Conditional Use Permit (Chapter 22.158), may impose additional conditions, but may not modify any of the following standards listed in this Section, except as otherwise provided in this Section or pursuant to a Variance (Chapter 22.194) application.~~

B. ~~Density.~~Application requirements. A Conditional Use Permit (Chapter 22.158) is required to establish, maintain, or expand a mobilehome park.

~~1. The total number of lots within a mobilehome park shall not exceed the number of dwelling units per net acre specified in the zone, unless a density bonus is granted, pursuant to Chapter 22.120 (Density Bonus).~~

~~2. In those zones or General Plan categories where residential densities have not been established, the density shall be established by the Commission or Hearing Officer.~~

C. ~~Access and Circulation Modification.~~ The requirements of this Section may be modified by either of the following:

1. ~~At least two access points to a public street or highway from the mobilehome park shall be provided, which can be used by emergency vehicles.~~ The Commission or Hearing Officer, in granting the Conditional Use Permit (Chapter 22.158), may impose additional conditions or modify the requirements of Subsection E, below; or

2. The requirements of Subsection D.1 and Subsection E, below, may be modified, waived, or reduced in accordance with Chapter 22.120 (Density Bonus), subject to a Housing Permit (Chapter 22.166).

D. ~~Screening.~~ ~~Public street frontages of a new mobilehome park shall be screened to a height between five feet and eight feet with a wall, a decorative fence, and opaque hedge of shrubs or trees, or a landscaped berm. Such screening shall be tapered to less than five feet where needed to provide unobstructed visibility for motorists.~~ Density.

1. The total number of dwelling units within a mobilehome park shall not exceed the maximum density pursuant to Section 22.02.050.B.2 (Maximum) or Section 22.06.020 (Suffixes to Zoning Symbols).

2. In those zones or General Plan categories where residential densities have not been established, the density shall be established by the Commission or Hearing Officer.

E. Signs Development Standards.

1. Access and Circulation. At least two access points to a public street or highway from the mobilehome park shall be provided, which can be used by emergency vehicles.

2. Screening. Public street frontages of a new mobilehome park shall be screened to a height between five feet and eight feet with a wall, a decorative fence, an opaque hedge of shrubs or trees, or a landscaped berm. Such screening shall be tapered to less than five feet where needed to provide unobstructed visibility for motorists.

3. Signs.

4a. Signs shall be subject to the provisions of Chapter 22.114 (Signs), except that in lieu of business signs standards as listed in that Chapter, a mobilehome park may only display the following signs:

aj. One wall-mounted or freestanding sign not exceeding 20 square feet in sign area, or 40 square feet in total sign area, to identify the mobilehome park may be located at each principal entrance.

bij. One freestanding sign, not exceeding six square feet in sign area or 12 feet in total sign area, advertising property for sale, lease, or rent, or indicating vacancy status, may be located at each principal entrance.

eiii. Temporary subdivision sales, entry, and special feature signs shall be allowed as specified in Section 22.114.180 (Temporary Subdivision and Real Estate Signs).

d~~iv~~. A directional or informational sign indicating the location of each residence by number shall be located at each principal entrance and at other appropriate locations for use by emergency vehicles, as well as the convenience of guests. The size, location, and number of such signs shall be established by the Commission or Hearing Officer.

2~~b~~. No source of illumination for any signs shall be directly visible from adjoining streets or residential property, and no such signs shall be erected within five feet of any exterior property line.

...

~~H. Recreational Vehicle Park within a Mobilehome Park. In Zones C-H, C-1, C-2, C-3, and C-M, where a recreational vehicle park is located within a mobilehome park, it shall be a separate section of the mobilehome park and shall be so designated.~~

H. Prohibitions.

...

2. There shall be no commercial uses, except those uses approved by the Commission or Hearing Officer ~~and which are necessary to facilitate the operation of the mobilehome park.~~

I. Repair. Notwithstanding the provisions of Subsection 22.172.020.G (Repair of Damaged or Partially Destroyed Buildings or Structures Nonconforming Due to Use or Standards), a mobilehome park may be repaired as follows:

1. A damaged or destroyed mobilehome park may replace legally established structures as a like-for-like replacement, and shall not exceed the area or number of dwellings that were damaged or destroyed;

2. Where a previous entitlement(s) that established the mobilehome park remains valid and in full effect at the time of damage, the rebuilt park shall comply with any previous conditions of approval;

3. Where the mobilehome park does not have a previous entitlement(s) that is valid and in full effect at the time of damage, the mobilehome park shall obtain a valid Conditional Use Permit prior to reconstruction.

J. ~~Long-Term Leases.~~ Maintenance. Notwithstanding Section 22.172.020.H (Maintenance of Buildings or Structures Nonconforming Due to Use), maintenance and routine repair is permitted in a mobilehome park as follows:

1. ~~In the event the County eliminates rent control for mobilehomes, all Conditional Use Permit (Chapter 22.158) applications for new mobilehome parks shall require as a condition of approval that all rental agreements have, in bold print no less than one-half inch high, the following statement: "There is no rent control for mobilehome parks in Los Angeles County. Potential residents may wish to secure long-term leases for their own protection."~~

1. Where the mobilehome park is within the grant term of a valid Conditional Use Permit or Nonconforming Use and Structure Review, maintenance and routine repair shall be subject to the conditions of such entitlement.

2. Where the mobilehome park is nonconforming due to use and within its amortization period, maintenance and routine repair is permitted provided that such maintenance and routine repair does not involve any alteration, enlargement, or addition to any building or structure; increase in occupant load; or any enlargement of area, space, or volume occupied by or devoted to such use.

3. Where the mobilehome park is nonconforming due to use, its amortization period has ended, and it does not have a valid Conditional Use Permit or Nonconforming Use and Structure Review, maintenance and routine repair is subject to the approval of a Conditional Use Permit (Chapter 22.158) application.

K. Waiver of Time Limits. When a mobilehome park which has been constituted of only rental spaces has completed a conversion to 51 percent owner-occupancy, all time limits established by the original permit may be waived at the request of the property owner upon notification and presentation of evidence to the satisfaction of the Director.

SECTION 16. Section 22.140.490 is hereby amended to read as follows:

22.140.490 Recreational Vehicle Parks.

...

B. Development Standards.

...

3. Area. The recreational vehicle park shall have an area of not less than five acres, unless the recreational vehicle park is located within a mobilehome park.

...

SECTION 17. Section 22.140.680 is hereby added to read as follows:

22.140.680 Condominium Conversions.

A. Purpose.

The purpose of this Section is to ensure that tenants are notified of an applicant's intent to convert rental dwelling units to condominiums, and that notifications of such intent are provided to organizations qualified to acquire rental housing and maintain its long-term affordability.

B. Applicability.

The provisions of this Section apply to the conversion of rental dwelling units to residential condominiums as defined in Division 2 (Definitions) under "Condominium conversion."

C. Requirements.

1. At least 60 days prior to the filing of a tentative map for a condominium conversion, the applicant shall provide to each of the tenants of the proposed condominium development notification of intent to convert, in accordance with section 66427.1 of the California Government Code.

2. At least 30 days prior to the filing of a tentative map for the conversion of rental dwelling units to a residential or mixed residential and commercial

condominium development, the applicant shall submit all of the following information to LACDA:

- a. The address(es) of the property(ies) that will be proposed to be converted;
- b. The number of rental dwelling units that will be proposed to be converted;
- c. The monthly rent collected per unit at the time the information is submitted;
- d. Whether the unit(s) are subject to the County's Rent Stabilization Ordinance; and
- e. The applicant's contact information.

3. Condominium conversions shall be subject to all applicable provisions of Chapter 22.119 (Affordable Housing Replacement) in Title 22, Chapter 8.52 (Rent Stabilization) in Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code, Title 21 (Subdivisions) of the County Code, and all other applicable provisions of section 66427.1 of the California Government Code.

SECTION 18. Section 22.166.040 is hereby amended to read as follows:

22.166.040 Administrative Housing Permit.

...

B. Application and Review Procedures.

...

2. Fees.

a. When an Administrative Housing Permit application is filed, it shall be accompanied by the required filing fee, as shown in Table 22.250.010-A (Filing Fee Schedule), or as specified otherwise in Subsections B (Fee Exemption and Reductions for Affordable Housing) or D (Fee Exemption for Mobilehome Parks) of Section 22.250.020, ~~subject to Chapter 22.120 (Density Bonus).~~

...

C. Findings and Decision.

1. An application that meets all the requirements for an Administrative Housing Permit shall be approved, subject to the following findings as applicable:

a. When an incentive is requested:

i. The incentive results in identifiable and actual cost reductions to provide for affordable housing costs or affordable rents for the ~~affordable housing set-aside~~ income-restricted units;

...

SECTION 19. Section 22.166.070 is hereby amended to read as follows:

22.166.070 Covenant and Agreement.

A. Affordable Housing. A covenant and agreement, acceptable to the LACDA, shall be recorded by the applicant with the Registrar-Recorder/County Clerk to ensure the continuing availability of ~~affordable housing set-aside~~ income-restricted units, and as applicable, transitional housing restricted units, supportive housing restricted units, age restricted units and child care facilities, in compliance with this Chapter ~~and,~~

Chapter 22.119 (Affordable Housing Replacement), Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), Chapter 22.128 (Additional Affordable Housing Streamlining), Chapter 22.130 (Motel Conversions Streamlining), and Chapter 22.140.660 (Motel Conversions, Temporary). All Housing Permits without a covenant and agreement that is recorded within 180 days of the Housing Permit effective date shall be null and void. ~~The covenant and agreement shall be recorded within 30 days of the Housing Permit effective date.~~

1. Standard Terms. The covenant and agreement shall include, but not be limited to, the following:

a. The total number of dwelling units and the number of ~~affordable housing set-aside~~ income-restricted units that must be restricted and monitored on an annual basis.

b. The household income levels assigned to the ~~affordable housing set-aside~~ income-restricted units.

c. The location, sizes (square footage), and number of bedrooms of the ~~affordable housing set-aside~~ income-restricted units. For-sale dwelling units must be fixed, and the rental dwelling units may float, as approved in writing by the LACDA.

...

2. ~~Rental Affordable Housing Set-Aside~~ Income-Restricted Units.

When ~~affordable housing set-aside~~ income-restricted units are rental dwelling units, the

covenant and agreement shall also include owner requirements related to the following, and subject to the LACDA's review and approval:

...

b. Policies and procedures to ensure a fair and transparent lease-up process, which may include, but are not limited to: advertising on the Los Angeles County Housing Resource Center website (or any similar or replacement County database or website, as applicable); an initial lease-up and tenant selection plan that outlines application qualification criteria and owner waiting list protocols; and a management plan that describes processes for filling vacancies and maintaining the habitability of the ~~affordable housing set-aside~~income-restricted units;

...

3. ~~For-Sale Affordable Housing Set-Aside~~Income-Restricted Units. When ~~affordable housing set-aside~~income-restricted units are for-sale dwelling units solely, ~~pursuant to Section 65915 of the California Government Code~~, the covenant and agreement shall also include owner requirements related to the following and subject to the LACDA's review and approval:

...

b. Provisions restricting the ~~affordable housing set-aside~~income-restricted units to be owner-occupied;

...

d. Provisions restricting the initial sale to eligible buyers, and requiring equity sharing with the County that states the following terms:

...

v. The County's initial subsidy shall be equal to the fair market value of the home at the time of initial sale minus the initial sale price, plus the amount of any down payment assistance or mortgage assistance. If upon resale the fair market value is lower than the initial fair market value, then the value at the time of the resale shall be used as the initial fair market value; and

vi. The County, a County-designated agency, or a qualified nonprofit shall maintain right of first refusal on the unit for the purpose of sale or rental to eligible households; and

vii. All County equity-sharing proceeds ~~shall be deposited into the County Affordable Housing Trust Fund, or equivalent, and~~ shall be used within five years for any of the purposes described in Section 33334.2(e) of the California Health and Safety Code that promote affordable home ownership.

4. Age-Restricted Units. When a housing development subject to this Subsection A includes age-restricted units, the covenant and agreement shall include provisions to ensure the age restrictions of the ~~affordable housing set-aside~~ income-restricted units in accordance with ~~§~~section 51.3 of the California Civil Code.

5. Child Care Facilities. When a housing development subject to this Subsection A includes a child care facility, the covenant and agreement shall also include the following to ensure compliance with ~~§~~subsections (A) and (B) of ~~§~~section 65915(h)(2) of the California Government Code:

...

b. The minimum amount of time in which a child care facility must remain in operation. That period of time shall be as long or longer than the period of time the ~~affordable housing set-aside~~income-restricted units are required to remain affordable, pursuant to Chapter 22.120 (Density Bonus); and

...

SECTION 20. Section 22.166.080 is hereby amended to read as follows:

22.166.080 Monitoring of Affordable Housing.

The monitoring of ~~affordable housing set-aside~~income-restricted units, transitional housing and supportive housing shall be administered by the LACDA. The LACDA shall be responsible for verifying income eligibility, verifying provision of on-site services for supportive housing units, monitoring sales of ~~affordable housing set-aside~~income-restricted units to qualified buyers, conducting periodic site inspections, and administering the annual certification of ~~affordable housing set-aside~~income-restricted units approved pursuant to this Chapter for the duration of the required term as specified in Chapter 22.119 (Affordable Housing Replacement), Chapter 22.120 (Density Bonus), or Chapter 22.121 (Inclusionary Housing).

A. Certification. Property owners shall certify with the LACDA that the ~~affordable housing set-aside~~income-restricted units are in conformance with the terms of the Housing Permit after the final certificate of occupancy is issued by Public Works for any dwelling unit in the project, and thereafter, on or before January 2 of each year.

B. Fees. The applicant for an approved Housing Permit shall pay monitoring fees, as described in Subsection B.3.b (Housing Permit Monitoring Fees) of Section 22.250.010.

C. Reporting. On or before April 1 of each year, the LACDA shall provide an annual report to the Director that describes the following:

1. The location and status of each ~~affordable housing set-aside~~income-restricted unit, including, where applicable, those affordable units restricted to transitional housing or supportive housing, approved in accordance with this Chapter; and

2. The results of the certification of each ~~affordable housing set-aside~~income-restricted unit and a notification to the Director of any necessary actions to maintain the ~~affordable housing set-aside~~income-restricted units.

D. Enforcement and Noncompliance. In the event of noncompliance, the owner of the ~~affordable housing set-aside~~income-restricted units shall be subject to Chapter 22.242 (Enforcement Procedures), the remedies described in the covenant and agreement, and any other remedies at law.

...

SECTION 21. Section 22.172.050 is hereby amended to read as follows:

22.172.050 Termination Conditions and Time Limits.

The following regulations shall apply to all nonconforming uses and buildings and structures nonconforming due to use, and to buildings and structures nonconforming due to standards as specified in this Section.

...

B. Termination by Operation of Law. Nonconforming uses and buildings or structures nonconforming due to use, and those buildings or structures nonconforming due to standards enumerated in this Section, shall be discontinued and removed from their sites within the time specified in this Section, except when extended or revoked as otherwise provided in this Title 22:

1. In the case of nonconforming uses and buildings or structures nonconforming due to use:

...

~~g. Where the property is developed as a mobilehome park, which is constituted only of spaces rented to mobilehomes, then the length of time shall be as specified by this Subsection B.1.~~

...

SECTION 22. Section 22.246.020 is hereby amended to read as follows:

22.246.020 Applicability of Zone Changes and Ordinance

Amendments.

A. Unless otherwise specified in this Title 22, if a complete application, as determined by the Director, was submitted to the Department prior to the effective date of a Zone Change (Chapter 22.198) or an Ordinance Amendment (Chapter 22.244):

...

2. If the applicant chooses to have the application be subject to the zoning and regulations that were applicable to the project prior to the effective date of such Zone Change or Ordinance Amendment:

a. The application may be modified prior to consideration by the Commission, Hearing Officer, or Director, and still be subject to the previously applicable zoning and regulations so long as the requested modification does not:

i. Change the project's housing type (e.g., from single-family residential to two-family or multi-family residential);

ii. Increase the project's residential density;

iii. Increase the project's floor area or lot coverage for non-residential space;

iv. Change the project's tenure;

v. Increase the amount of grading for the project; or

vi. Increase the area of ground disturbance resulting from the project.

...

SECTION 23. Section 22.250.010 is hereby amended to read as follows:

22.250.010 Filing Fees and Deposits.

A. For the purpose of defraying the expense involved in connection with any application or petition required or authorized by this Title 22, the following fees, as provided in Table 22.250.010-A, below, shall accompany the application or petition. Table 22.250.010-A may be referred to as the Filing Fee Schedule.

TABLE 22.250.010-A: FILING FEE SCHEDULE		
...		
Minor Parking Deviation		\$1,441
Mobilehome Park Impact Report	For each impact report filed pursuant to Section 8.57.300 in Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code	\$7,132
...		

B. Additional Fees.

...

3. Housing Permits.

...

b. Housing Permit Monitoring Fees. The applicant for an approved Housing Permit (Chapter 22.166) shall be required to pay monitoring fees directly to the LACDA, as follows:

i. An amount equal to \$170 x 55 years per unit ~~of~~ for the rental ~~affordable-income-restricted units housing set aside~~, except that for housing developments with more than 10 ~~affordable-income-restricted housing set aside~~ units, the fee shall be the same amount as a housing development with 10 ~~affordable-income-restricted housing set aside~~ units. The fee may be paid annually or capitalized as a one-time lump sum payment, as approved by the LACDA;

ii. A one-time lump sum in the amount of \$2,934 per unit ~~of~~ for the for-sale ~~affordable-income-restricted units housing set aside~~;

...

SECTION 24. Section 22.250.020 is hereby amended to read as follows:

22.250.020 Fee Waivers, Exemptions, and Reductions.

...

B. Fee Exemption and Reduction for Affordable Housing. An applicant for a Housing Permit (Chapter 22.166) may request an exemption from or a reduction in the payment of any planning and zoning fees or deposits if a housing development provides ~~an affordable housing set-aside pursuant to Section 22.120.050 (Affordable Housing),~~ income-restricted units subject to the following:

...

2. Fee Reduction. Request for a fee reduction shall be granted, if the housing development provides ~~an affordable housing set-aside~~ income-restricted unit(s), but the applicant is not eligible for the fee exemption described in Subsection B.1, above. The rate of reduction shall be the total number of ~~affordable~~ income-restricted dwelling units divided by the total number of dwelling units. For the purpose of this Subsection B.2, "total number of dwelling units" means all dwelling units within the housing development, exclusive of a manager's unit or units, and inclusive of dwelling units permitted by the density bonus(es) awarded, if applicable.

...

C. Fee Exemption for Shelters and Accessory Overnight Safe Parking. An applicant may request an exemption from the payment of planning and zoning fees for a Ministerial Site Plan Review to develop a domestic violence shelter, emergency shelter, or accessory shelter, or accessory overnight safe parking. For the purpose of this Subsection C, "planning and zoning fees" are the fees provided in Section 22.250.010 (Filing Fees and Deposits) incurred by the Department. This Subsection C does not

authorize any exemption from the payment of fees or deposits incurred by other County departments or agencies.

D. Fee Exemption for Mobilehome Parks. An applicant for a mobilehome park may request an exemption from the payment of any planning and zoning fees or deposits. For the purpose of this Subsection D, "planning and zoning fees or deposits" are the fees or deposits provided in Section 22.250.010 (Filing Fees and Deposits) incurred by the Department. This Subsection D does not authorize any exemption from, or reduction in, the payment of fees or deposits incurred by other County departments or agencies.

...

SECTION 25. Chapter 22.268 is hereby added to read as follows:

Chapter 22.268 AFFORDABLE HOUSING REPLACEMENT FEE

Sections:

22.268.010 Applicability.

22.268.020 Amount.

22.268.030 Calculation.

22.268.040 Timing of Payment.

22.268.050 Annual Fee Update.

22.268.060 Use of Fees.

22.268.010 Applicability.

This section applies to projects eligible to pay an affordable housing replacement fee pursuant to Section 22.119.050.E.

22.268.020 Amount.

A. The amount shall be the applicable replacement fee per square foot multiplied by the gross floor area of the units requiring replacement. If the square footage of the units requiring replacement is not known, a per-unit fee shall apply.

B. The fees shall be applied by submarket area as defined in Section 22.14.010.A under “Affordable housing and senior citizen housing” and in accordance with Table 22.268.020-A.

TABLE 22.268.020-A: AFFORDABLE HOUSING REPLACEMENT FEES		
Submarket Area	Fee Per Square Foot of Gross Building Area	Fee Per Unit
Antelope Valley	\$144	\$129,470
Coastal South Los Angeles	\$346	\$318,914
East Los Angeles/Gateway	\$270	\$228,116
San Gabriel Valley	\$268	\$292,277
Santa Clarita Valley	\$174	\$154,294
South Los Angeles	\$269	\$231,360

22.268.030 Calculation.

The replacement fee shall be calculated using the effective rate on the date the complete permit application for the principal project is submitted to the Department.

22.268.040 Timing of Payment.

A. If no discretionary approval is associated with the project, the replacement fee shall be due and payable prior to approval of the principal project by the Department.

B. If the project requires a discretionary approval other than a land division, the replacement fee shall be due and payable concurrently with fees submitted pursuant to Section 22.222.260.B (Performance Guarantee and Covenant).

C. If the project is a land division, the replacement fee shall be due and payable with final map submittal pursuant to Section 21.44.050 (Materials required for submittal) in Title 21 (Subdivisions).

22.268.050 Annual Fee Update.

The replacement fee shall be updated annually based on the annual increase in the Construction Costs Index (CCI) published by Engineering News Record for Los Angeles, or a similar construction industry index selected by the Department in the event the CCI is discontinued.

22.268.060 Use of Fees.

Replacement fees shall be used by the County, a County-designated agency, or a qualified nonprofit for any of the purposes described in section 33334.2(e) of the California Health and Safety Code. The use of such funds shall be prioritized within the same unincorporated submarket area of the project.

[CH848AHPSCCC]

ORDINANCE NO. _____

An ordinance amending Title 8 – Consumer Protection, Business and Wage Regulations, Title 21 – Subdivisions, and Title 22 – Planning and Zoning of the Los Angeles County Code to establish an Affordable Housing Preservation Ordinance in the unincorporated areas of Los Angeles County.

The Board of Supervisors of the County of Los Angeles ordains as follows:

SECTION 1. Chapter 8.48 is hereby deleted in its entirety.

SECTION 2. Section 21.40.110 is hereby amended to read as follows:

21.40.110 Matters ~~r~~Required to ~~e~~Complete ~~s~~Submittal and ~~f~~Filing.

A. For a tentative map to be deemed submitted and filed, the following matters must be completed and received:

...

3. The fees paid in accordance with Section 21.62.080.

4. All documentation required, as applicable, pursuant to ~~Chapter~~

22.119 (Affordable Housing Replacement), Section 22.140.680 (Condominium Conversions), ~~Chapter 22.119 (Affordable Housing Replacement),~~ and sections 66427.4 through 66427.5 of the California Government Code.

...

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SECTION 3. Section 21.44.050 is hereby amended to read as follows:

21.44.050 Matters ~~r~~Required for ~~s~~Submittal.

At the time of submittal of the final tract map or parcel map, or prints thereof, the following matters shall be submitted to the county engineer or the Department of Regional Planning, as specified, as an aid in the processing of the final maps:

...

F. Fees paid to the Department of Regional Planning in accordance with Chapter 22.268, if applicable.

SECTION 4. Section 22.02.055 is hereby added to read as follows:

22.02.055 Applicability of Affordable Housing Replacement.

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No approvals shall be issued under this Title 22 without replacement of affordable housing units when required pursuant to Chapter 22.119 (Affordable Housing Replacement).

SECTION 5. Section 22.14.010 is hereby amended to read as follows:

22.14.010 A.

...

Affordable housing and senior citizen housing. The following terms are defined for the purposes of Chapter 22.119 (Affordable Housing Replacement), Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), Chapter 22.128 (Additional Affordable Housing Streamlining), Chapter 22.130 (Motel Conversions Streamlining), and Chapter 22.166 (Housing Permits):

...

Affordable rent. As defined in Section 50053 of the California Health and Safety Code.

Affordable replacement units. Dwelling units reserved for extremely low, very low, lower or moderate income households provided pursuant to Chapter 22.119 (Affordable Housing Replacement).

...

Income. See "Income" for the following:

Area median income.

Extremely low income.

Lower income.

Moderate income.

Middle income.

Income-restricted units. This term includes "affordable housing set-aside" and "affordable replacement units."

...

SECTION 6. Section 22.14.030 is hereby amended to read as follows:

22.14.030 C.

...

Conditional use. Uses which because of characteristics peculiar to them, or because of size, technological processes, or types of equipment, or because of their location with reference to surroundings, street or highway width, traffic generation, or other demands on public services, require discretionary consideration relative to

placement at specific locations in the zones where classified to ensure proper integration with other existing or permitted uses in the same zones.

Condominium conversion. The conversion of rental dwelling units to condominiums, as defined in section 4125 of the California Civil Code, that are dwelling units.

...

SECTION 7. Section 22.14.130 is hereby amended to read as follows:

22.14.130 M.

...

Mixed use development. A development that combines residential and commercial uses, unless otherwise specified.

Mobilehome. As defined in ~~§~~section 18008, or a manufactured home as defined in section 18007, of the California Health and Safety Code. This term includes "supportive housing" and "transitional housing."

...

SECTION 8. Section 22.22.030 is hereby amended to read as follows:

22.22.030 Land Use Regulations for Zones M-1, M-1.5, M-2, and M-2.5.

...

C. Use regulations.

1. Principal Uses. Table 22.22.030-B, below, identifies the permit or review required to establish each principal use.

TABLE 22.22.030-B: PRINCIPAL USE REGULATIONS FOR INDUSTRIAL ZONES					
	M-1	M-1.5	M-2	M-2.5	Additional Regulations
...					
Trap ranges	CUP	CUP	CUP	CUP	
Residential uses					
Mobilehome parks ²⁰	CUP	:	CUP	:	Section 22.140.370
...					
Notes:					
...					
20. Where use is existing and legal nonconforming.					

...

SECTION 9. Chapter 22.119 is hereby added to read as follows:

Chapter 22.119 AFFORDABLE HOUSING REPLACEMENT

Sections:

22.119.010 Purpose.

22.119.020 Definitions.

22.119.030 Applicability.

22.119.040 Exemptions.

22.119.050 Requirements.

22.119.010 Purpose.

The purpose of this Chapter is to preserve the supply of affordable housing and require affordability of replacement dwelling units.

22.119.020 Definitions.

Specific terms used in this Chapter are defined in Division 2 (Definitions), under "Affordable housing and senior citizen housing."

22.119.030 Applicability.

Except as otherwise specified in this Chapter, the provisions of this Chapter, in conjunction with Chapter 22.166 (Housing Permits), apply to any of the following:

- A. New construction of any principal building;
- B. A change of a principal residential use to another principal use;
- C. A change in the number of dwelling units;
- D. A land division subject to Title 21 (Subdivisions) of the County Code; or
- E. Legalization of an existing unpermitted dwelling unit.

22.119.040 Exemptions.

The following are exempt from the requirements of this Chapter:

- A. New construction of a single-family residence on a lot with no other principal uses or structures;
- B. New construction or legalization of accessory dwelling units or junior accessory dwelling units;
- C. Conversion to resident ownership of all rented spaces in a mobilehome park;
- D. Addition of mobilehome spaces or mobilehomes in a mobilehome park;
- E. A lease project as defined in Section 21.08.090 (Lease project) in Title 21 (Subdivisions) of the County Code;
- F. A project in a Very High Fire Hazard Severity Zone, ~~as depicted in the~~ **General Plan;**

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G. A project in an area subject to a specific plan or policy with an affordable housing replacement requirement.

22.119.050 Requirements.

A. Dwelling units that are proposed to be or have been demolished, vacated, or converted from rental to for-sale, shall be replaced if they are permitted in the zone and are or were any of the following:

1. Subject to a recorded covenant that restricts rents to levels affordable to persons and families of moderate, lower, very low or extremely low income within the five years prior to application submittal;

2. A rent-stabilized unit pursuant to Section 8.52.030.F (Covered Rental Unit) in Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code or pursuant to section 1947.12 of the California Civil Code within the five years prior to application submittal;

3. Occupied by lower, very low or extremely low income tenants within the five years prior to application submittal;

4. Withdrawn from rent or lease in accordance with Chapter 12.75 (commencing with section 7060) of the California Government Code within the 10 years prior to application submittal.

B. The number and type of affordable replacement units shall be determined as follows:

1. The number of affordable replacement units for lower or very low income households shall be determined in accordance with section 65915 of the California Government Code;

2. Affordable replacement units for lower or very low income households shall be provided at the level of affordability determined in accordance with section 65915 of the California Government Code;

3. Affordable replacement units for extremely low income households shall be provided in at least the same number as existed on the site within the five years prior to application submittal, or in the same proportion of extremely low income renter households to all renter households within unincorporated County, as determined by the most recently available data from the United States Department of Housing and Urban Development's Comprehensive Housing Affordability Strategy database, if the income category is unknown for any of the following:

a. The current household in occupancy at the time of application submittal;

b. The last household in occupancy if a unit is unoccupied at the time of application submittal; or

c. The households at the highpoint of such units that existed in the five-year period preceding application, if the units have been vacated or demolished.

4. Dwelling units that are or were rent-stabilized pursuant to Section 8.52.030.F (Covered Unit) in Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code or section 1947.12 of the California Civil Code during

the five-year period prior to application submittal, and were or are occupied by households above lower income, shall be replaced with units affordable to lower, very low or extremely low income households;

5. At least the same total number of dwelling units and at least the same total number of bedrooms shall be replaced at the same or deeper level of affordability;

6. The required number of affordable replacement units shall not be reduced as the result of the deeper level of affordability of the affordable replacement units;

7. Affordable replacement units affordable to lower, very low or extremely low income households shall be rental dwelling units; and

8. Moderate income units. Units subject to a covenant that restricts rents to levels affordable to moderate income households shall be replaced with units that are affordable to households of moderate income or below moderate income. If they are replaced with units affordable to households of moderate income, the affordable replacement units may be rental or for-sale.

C. Inclusionary Housing or Density Bonus. Affordable replacement units required in this Chapter may count toward the affordable housing set-aside units required in Chapter 22.120 (Density Bonus) or Chapter 22.121 (Inclusionary Housing), if applicable.

D. ~~Affordable replacement units shall be provided on-site, or off-site if both of the following are met:~~ Location of Affordable Replacement Units.

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1. ~~The affordable replacement units count toward the affordable housing set-aside units required in Chapter 22.121 (Inclusionary Housing) and are subject to Section 22.121.050.F (Location); and On-site. Except as specified in Subsection D.2, below, affordable replacement units shall be provided on-site.~~

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2. ~~The construction of such units does not result in units requiring replacement pursuant to this Chapter Off-site.~~

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a. Affordable replacement units may be provided off-site, subject to the following:

i. The affordable replacement units count toward the affordable housing set-aside units required in Chapter 22.121 (Inclusionary Housing);

ii. The required affordable housing set-aside units are provided off-site subject to all applicable provisions in Section 22.121.050.F (Location), except that the off-site parcel is located in an unincorporated area of the County and is either within one-quarter mile of the principal project or developed as part of a community land trust; and

iii. The construction of such units does not result in units requiring replacement pursuant to this Chapter.

b. Notwithstanding Subsection D.2.a.i, above, where the number of required affordable replacement units exceeds the number of required affordable housing set-aside units that are provided off-site, all affordable replacement units, including those that do not count toward the required affordable housing set-aside units, may be provided on the same off-site parcel, subject to the following:

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i. The off-site parcel, with its developable acreage, zoning and General Plan land use designation, is sufficient to permit the construction of all affordable replacement units; and

ii. The requirements in Section 22.121.050.F.6, if the applicant partners with a third-party developer for the provisions of the affordable replacement units.

E. Notwithstanding Subsection D, above, a project that is subject to this Chapter may provide replacement in accordance with Chapter 22.268 (Affordable Housing Replacement Fee) if it is either of the following:

1. A non-residential development; or
2. A land division that:
 - a. Shall result in no increase in dwelling units; and
 - b. Is required to provide rental replacement units pursuant to

this Section.

F. Tenure. Affordable replacement units in a common interest development or a single-family residential subdivision shall be for-sale only.

G. Timing. All permits and entitlements, including the building permits, for the affordable replacement units shall be obtained prior to or concurrently with the permits and entitlements, including the building permits, for the non-replacement units.

H. Duration of Affordability.

1. Rental. The affordability term for rental replacement units shall be ~~99 years from the issuance of the final certificate of occupancy by Public Works~~in perpetuity.

2. For-sale. The initial sale of the affordable replacement units shall be restricted to eligible buyers and shall require an equity-sharing agreement with the County, as described in Chapter 22.166 (Housing Permits).

I. Covenant and Agreement Required. A covenant and agreement ensuring the continued availability of affordable replacement units shall be recorded, pursuant to Section 22.166.070 (Covenant and Agreement).

SECTION 10. Section 22.120.040 is hereby amended to read as follows:

22.120.040 Eligibility.

Except as specified otherwise, a project is eligible for a density bonus, if it complies with the following:

...

B. Replacement Dwelling Units. The project shall replace ~~the any rental dwelling units that are or were occupied by lower or very low income households during the five-year period prior to application submittal, subject to the following~~exist(ed) on the site pursuant to Chapter 22.119 (Affordable Housing Replacement).

1. ~~The affordable housing set-aside is inclusive of the replacement dwelling units. The replacement dwelling units can be counted toward the affordable housing set-aside;~~

~~2. Dwelling units requiring replacement include covenant-restricted units and non-covenant-restricted units;~~

~~3. The number of replacement dwelling units shall be determined in accordance with Section 65915 of the California Government Code;~~

~~4. Replacement dwelling units shall be provided at the level of affordability determined in accordance with Section 65915 of the California Government Code;~~

~~5. Each replacement dwelling unit shall have at least the same number of bedrooms as the dwelling unit being replaced;~~

~~6. Replacement dwelling units can be provided for households at a deeper level of affordability than required, but the required number of replacement dwelling units shall not be reduced as a result; and~~

~~7. Replacement dwelling units can be rental dwelling units or for-sale dwelling units, subject to the requirements of Subsection B.1 (Duration of Affordability) of Section 22.120.050.~~

C. Additional Requirements. The project shall be in compliance with one of the following:

1. Section 22.120.050 (Affordable Housing);
2. Section 22.120.060 (Senior Citizen Housing); or
3. Section 22.120.070 (Land Donation); or
4. Section 22.120.075 (Mobilehome Park Density Bonus).

...

SECTION 11. Section 22.120.075 is hereby added to read as follows:

22.120.075 Mobilehome Park Density Bonus.

A. An existing legal nonconforming mobilehome park that exceeds the density permitted by the General Plan or the zone, and that is not receiving any other density bonus pursuant to this Chapter, shall be eligible for a density bonus which would deem the existing total number of mobilehome spaces as the maximum number of dwelling units permitted on site, subject to the approval of an Administrative Housing Permit (Section 22.166.040) application.

B. Such application is not subject to Section 22.166.040.B.2.b or Section 22.166.040.C.3.

C. Such application is not eligible for any waivers or reductions of development standards provided in Section 22.120.090 (Waivers of Reductions of Development Standards).

SECTION 12. Section 22.120.090 is hereby amended to read as follows:

22.120.090 Waivers or Reductions of Development Standards.

A. Except as specified otherwise, a project that is subject to this Chapter shall receive waivers or reductions of development standards as follows:

...

SECTION 1213. Section 22.121.050 is hereby amended to read as follows:

22.121.050 Affordable Housing Set-Aside.

...

C. Calculation.

...

2. Density Bonus. The affordable housing set-aside units required in Chapter 22.120 (Density Bonus) may count toward the affordable housing set-aside units required in this Chapter, in which case such units shall be:

a. Subject to Section 22.120.050.B.1 (Duration of Affordability);

and

b. Provided on-site.

3. Affordable Housing Replacement. Affordable replacement units required pursuant to Chapter 22.119 (Affordable Housing Replacement) may count toward the affordable housing set-aside units required in this Chapter.

4. Average Affordability. Average affordability is the sum of each unit set aside for extremely low income, very low income, lower income, moderate income, or middle income households multiplied by the income level, and divided by the total number of affordable housing set-aside units.

...

F. Location. The required affordable housing set-aside units shall be provided on-site, or off-site provided that:

...

5. The construction of the affordable housing set-aside units for the principal project does not result in units requiring replacement on the off-site parcel pursuant to Chapter 22.119 (Affordable Housing Replacement).

56. Where the applicant partners with a third-party developer for the provisions of the affordable housing set-aside units on the off-site parcel:

...

SECTION 1314. Section 22.128.050 is hereby amended to read as follows:

22.128.050 Eligibility.

Except as specified otherwise, a project is eligible for streamlining if it complies with the following:

A. Public Funding. The project shall be publicly funded, or the applicant shall have applied for, or shall intend to apply for, public funding; **and**

B. Replacement Dwelling Units. The project shall replace ~~the rental dwelling units that are or were occupied by lower or very low income households pursuant to Section 22.120.040.B Chapter 22.119 (Affordable Housing Replacement Dwelling Units).~~

...

SECTION 4415. Section 22.140.370 is hereby amended to read as follows:

22.140.370 Mobilehome Parks.

A. Applicability. This Section applies to mobilehome parks in all zones where allowed. ~~The Commission or Hearing Officer, in granting the Conditional Use Permit (Chapter 22.158), may impose additional conditions, but may not modify any of the following standards listed in this Section, except as otherwise provided in this Section or pursuant to a Variance (Chapter 22.194) application.~~

B. ~~Density-Application requirements. A Conditional Use Permit (Chapter 22.158) is required to establish, maintain, or expand a mobilehome park.~~

1. ~~— The total number of lots within a mobilehome park shall not exceed the number of dwelling units per net acre specified in the zone, unless a density bonus is granted, pursuant to Chapter 22.120 (Density Bonus).~~

2. ~~— In those zones or General Plan categories where residential densities have not been established, the density shall be established by the Commission or Hearing Officer.~~

C. ~~Access and Circulation-Modification. The requirements of this Section may be modified by either of the following:~~

1. ~~At least two access points to a public street or highway from the mobilehome park shall be provided, which can be used by emergency vehicles. The Commission or Hearing Officer, in granting the Conditional Use Permit (Chapter 22.158), may impose additional conditions or modify the requirements of Subsection E, below; or~~

2. ~~The requirements of Subsection D.1 and Subsection E, below, may be modified, waived, or reduced in accordance with Chapter 22.120 (Density Bonus), subject to a Housing Permit (Chapter 22.166).~~

D. ~~Screening. Public street frontages of a new mobilehome park shall be screened to a height between five feet and eight feet with a wall, a decorative fence, and opaque hedge of shrubs or trees, or a landscaped berm. Such screening shall be~~

tapered to less than five feet where needed to provide unobstructed visibility for motorists.Density.

1. The total number of dwelling units within a mobilehome park shall not exceed the maximum density pursuant to Section 22.02.050.B.2 (Maximum) or Section 22.06.020 (Suffixes to Zoning Symbols).

2. In those zones or General Plan categories where residential densities have not been established, the density shall be established by the Commission or Hearing Officer.

E. SignsDevelopment Standards.

1. Access and Circulation. At least two access points to a public street or highway from the mobilehome park shall be provided, which can be used by emergency vehicles.

2. Screening. Public street frontages of a new mobilehome park shall be screened to a height between five feet and eight feet with a wall, a decorative fence, an opaque hedge of shrubs or trees, or a landscaped berm. Such screening shall be tapered to less than five feet where needed to provide unobstructed visibility for motorists.

3. Signs.

1a. Signs shall be subject to the provisions of Chapter 22.114 (Signs), except that in lieu of business signs standards as listed in that Chapter, a mobilehome park may only display the following signs:

ai. One wall-mounted or freestanding sign not exceeding 20 square feet in sign area, or 40 square feet in total sign area, to identify the mobilehome park may be located at each principal entrance.

bii. One freestanding sign, not exceeding six square feet in sign area or 12 feet in total sign area, advertising property for sale, lease, or rent, or indicating vacancy status, may be located at each principal entrance.

eiii. Temporary subdivision sales, entry, and special feature signs shall be allowed as specified in Section 22.114.180 (Temporary Subdivision and Real Estate Signs).

div. A directional or informational sign indicating the location of each residence by number shall be located at each principal entrance and at other appropriate locations for use by emergency vehicles, as well as the convenience of guests. The size, location, and number of such signs shall be established by the Commission or Hearing Officer.

2b. No source of illumination for any signs shall be directly visible from adjoining streets or residential property, and no such signs shall be erected within five feet of any exterior property line.

...

~~H. —Recreational Vehicle Park within a Mobilehome Park. In Zones C-H, C-1, C-2, C-3, and C-M, where a recreational vehicle park is located within a mobilehome park, it shall be a separate section of the mobilehome park and shall be so designated.~~

H. Prohibitions.

...

2. There shall be no commercial uses, except those uses approved by the Commission or Hearing Officer ~~and which are necessary to facilitate the operation of the mobilehome park.~~

I. Repair and Maintenance. Notwithstanding the provisions of Subsection 22.172.020.G (Repair of Damaged or Partially Destroyed Buildings or Structures Nonconforming Due to Use or Standards) and Subsection 22.172.020.H (Maintenance of Buildings or Structures Nonconforming Due to Use), a mobilehome park may be repaired ~~or maintained~~ as follows:

1. A damaged or destroyed mobilehome park may replace legally established structures as a like-for-like replacement, and shall not exceed the area or number of dwellings that were damaged or destroyed;

2. Where a previous entitlement(s) that established the mobilehome park remains valid and in full effect at the time of damage, the rebuilt park shall comply with any previous conditions of approval;

3. ~~Mobilehome parks without a valid Conditional Use Permit must obtain one prior to reconstruction.]~~ Where the mobilehome park does not have a previous entitlement(s) that is valid and in full effect at the time of damage, the mobilehome park shall obtain a valid Conditional Use Permit prior to reconstruction.

J. ~~Long-Term Leases. Maintenance. Notwithstanding Section 22.172.020.H (Maintenance of Buildings or Structures Nonconforming Due to Use), maintenance and routine repair is permitted in a mobilehome park as follows;~~

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1. ~~In the event the County eliminates rent control for mobilehomes, all Conditional Use Permit (Chapter 22.158) applications for new mobilehome parks shall require as a condition of approval that all rental agreements have, in bold print no less than one-half inch high, the following statement: "There is no rent control for mobilehome parks in Los Angeles County. Potential residents may wish to secure long-term leases for their own protection."~~

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1. ~~Where the mobilehome park is within the grant term of a valid Conditional Use Permit or Nonconforming Use and Structure Review, maintenance and routine repair shall be subject to the conditions of such entitlement.~~

2. ~~Where the mobilehome park is nonconforming due to use and within its amortization period, maintenance and routine repair is permitted provided that such maintenance and routine repair does not involve any alteration, enlargement, or addition to any building or structure; increase in occupant load; or any enlargement of area, space, or volume occupied by or devoted to such use.~~

3. ~~Where the mobilehome park is nonconforming due to use, its amortization period has ended, and it does not have a valid Conditional Use Permit or Nonconforming Use and Structure Review, maintenance and routine repair is subject to the approval of a Conditional Use Permit (Chapter 22.158) application.~~

K. Waiver of Time Limits. When a mobilehome park which has been constituted of only rental spaces has completed a conversion to 51 percent owner-occupancy, all time limits established by the original permit may be waived at the request of the property owner upon notification and presentation of evidence to the satisfaction of the Director.

SECTION 4516. Section 22.140.490 is hereby amended to read as follows:

22.140.490 Recreational Vehicle Parks.

...

B. Development Standards.

...

3. Area. The recreational vehicle park shall have an area of not less than five acres, unless the recreational vehicle park is located within a mobilehome park.

...

SECTION 4617. Section 22.140.680 is hereby added to read as follows:

22.140.680 Condominium Conversions.

A. Purpose.

The purpose of this Section is to ensure that tenants are notified of an applicant's intent to convert rental dwelling units to condominiums, and that notifications of such intent are provided to organizations qualified to acquire rental housing and maintain its long-term affordability.

B. Applicability.

The provisions of this Section apply to the conversion of rental dwelling units to residential condominiums as defined in Division 2 (Definitions) under "Condominium conversion."

C. Requirements.

1. At least 60 days prior to the filing of a tentative map for a condominium conversion, the applicant shall provide to each of the tenants of the proposed condominium development notification of intent to convert, in accordance with section 66427.1 of the California Government Code.

2. At least 30 days prior to the filing of a tentative map for the conversion of rental dwelling units to a residential or mixed residential and commercial condominium development, the applicant shall submit all of the following information to LACDA:

- a. The address(es) of the property(ies) that will be proposed to be converted;
- b. The number of rental dwelling units that will be proposed to be converted;
- c. The ~~average~~ monthly rent collected per unit at the time the information is submitted;
- d. Whether the unit(s) are subject to the County's Rent Stabilization Ordinance; and
- e. The applicant's contact information.

3. Condominium conversions shall be subject to **all applicable provisions of** Chapter 22.119 (Affordable Housing Replacement) in Title 22, Chapter 8.52 (Rent Stabilization) in Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code, ~~and all of~~ Title 21 (Subdivisions) of the County Code, and all other applicable provisions of section 66427.1 of the California Government Code.

SECTION 4718. Section 22.166.040 is hereby amended to read as follows:

22.166.040 Administrative Housing Permit.

...

B. Application and Review Procedures.

...

2. Fees.

a. When an Administrative Housing Permit application is filed, it shall be accompanied by the required filing fee, as shown in Table 22.250.010-A (Filing Fee Schedule), or as specified otherwise in Subsection s B (Fee Exemption and Reductions for Affordable Housing) or D (Fee Exemption for Mobilehome Parks) of Section 22.250.020, ~~subject to Chapter 22.120 (Density Bonus)~~.

...

C. Findings and Decision.

1. An application that meets all the requirements for an Administrative Housing Permit shall be approved, subject to the following findings as applicable:

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a. When an incentive is requested:

i. The incentive results in identifiable and actual cost reductions to provide for affordable housing costs or affordable rents for the ~~affordable housing set-aside~~ income-restricted units;

...

SECTION 4819. Section 22.166.070 is hereby amended to read as follows:

22.166.070 Covenant and Agreement.

A. Affordable Housing. A covenant and agreement, acceptable to the LACDA, shall be recorded by the applicant with the Registrar-Recorder/County Clerk to ensure the continuing availability of ~~affordable housing set-aside~~ income-restricted units, and as applicable, transitional housing restricted units, supportive housing restricted units, age restricted units and child care facilities, in compliance with this Chapter ~~and~~, Chapter 22.119 (Affordable Housing Replacement), Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), Chapter 22.128 (Additional Affordable Housing Streamlining), Chapter 22.130 (Motel Conversions Streamlining), and Chapter 22.140.660 (Motel Conversions, Temporary). All Housing Permits without a covenant and agreement that is recorded within 180 days of the Housing Permit effective date shall be null and void. ~~The covenant and agreement shall be recorded within 30 days of the Housing Permit effective date.~~

1. Standard Terms. The covenant and agreement shall include, but not be limited to, the following:

a. The total number of dwelling units and the number of ~~affordable housing set-aside~~income-restricted units that must be restricted and monitored on an annual basis.

b. The household income levels assigned to the ~~affordable housing set-aside~~income-restricted units.

c. The location, sizes (square footage), and number of bedrooms of the ~~affordable housing set-aside~~income-restricted units. For-sale dwelling units must be fixed, and the rental dwelling units may float, as approved in writing by the LACDA.

...

2. ~~Rental Affordable Housing Set-Aside~~Income-Restricted Units.

When ~~affordable housing set-aside~~income-restricted units are rental dwelling units, the covenant and agreement shall also include owner requirements related to the following, and subject to the LACDA's review and approval:

...

b. Policies and procedures to ensure a fair and transparent lease-up process, which may include, but are not limited to: advertising on the Los Angeles County Housing Resource Center website (or any similar or replacement County database or website, as applicable); an initial lease-up and tenant selection plan that outlines application qualification criteria and owner waiting list protocols; and a management plan that describes processes for filling vacancies and maintaining the habitability of the ~~affordable housing set-aside~~income-restricted units;

...

3. ~~For-Sale Affordable Housing Set-Aside~~Income-Restricted Units.

When ~~affordable housing set-aside~~income-restricted units are for-sale dwelling units solely, ~~pursuant to Section 65915 of the California Government Code,~~ the covenant and agreement shall also include owner requirements related to the following and subject to the LACDA's review and approval:

...

b. Provisions restricting the ~~affordable housing set-aside~~income-restricted units to be owner-occupied;

...

d. Provisions restricting the initial sale to eligible buyers, and requiring equity sharing with the County that states the following terms:

...

v. The County's initial subsidy shall be equal to the fair market value of the home at the time of initial sale minus the initial sale price, plus the amount of any down payment assistance or mortgage assistance. If upon resale the fair market value is lower than the initial fair market value, then the value at the time of the resale shall be used as the initial fair market value; and

vi. The County, a County-designated agency, or a qualified nonprofit shall maintain right of first refusal on the unit for the purpose of sale or rental to eligible households; and

vii. All County equity-sharing proceeds shall be deposited into the County Affordable Housing Trust Fund, or equivalent, and shall be used within five years for any of the purposes described in Section 33334.2(e) of the California Health and Safety Code that promote affordable home ownership.

4. Age-Restricted Units. When a housing development subject to this Subsection A includes age-restricted units, the covenant and agreement shall include provisions to ensure the age restrictions of the ~~affordable housing set-aside income-restricted~~ units in accordance with ~~Section~~ 51.3 of the California Civil Code.

5. Child Care Facilities. When a housing development subject to this Subsection A includes a child care facility, the covenant and agreement shall also include the following to ensure compliance with ~~Subsections~~ (A) and (B) of ~~Section~~ 65915(h)(2) of the California Government Code:

...

b. The minimum amount of time in which a child care facility must remain in operation. That period of time shall be as long or longer than the period of time the ~~affordable housing set-aside income-restricted~~ units are required to remain affordable, pursuant to Chapter 22.120 (Density Bonus); and

...

SECTION 4920. Section 22.166.080 is hereby amended to read as follows:

22.166.080 Monitoring of Affordable Housing.

The monitoring of ~~affordable housing set-aside units~~income-restricted units, transitional housing and supportive housing shall be administered by the LACDA. The LACDA shall be responsible for verifying income eligibility, verifying provision of on-site services for supportive housing units, monitoring sales of ~~affordable housing set-aside~~income-restricted units to qualified buyers, conducting periodic site inspections, and administering the annual certification of ~~affordable housing set-aside~~income-restricted units approved pursuant to this Chapter for the duration of the required term as specified in Chapter 22.119 (Affordable Housing Replacement), Chapter 22.120 (Density Bonus), or Chapter 22.121 (Inclusionary Housing).

A. Certification. Property owners shall certify with the LACDA that the ~~affordable housing set-aside~~income-restricted units are in conformance with the terms of the Housing Permit after the final certificate of occupancy is issued by Public Works for any dwelling unit in the project, and thereafter, on or before January 2 of each year.

B. Fees. The applicant for an approved Housing Permit shall pay monitoring fees, as described in Subsection B.3.b (Housing Permit Monitoring Fees) of Section 22.250.010.

C. Reporting. On or before April 1 of each year, the LACDA shall provide an annual report to the Director that describes the following:

1. The location and status of each ~~affordable housing set-aside~~income-restricted unit, including, where applicable, those affordable units restricted to transitional housing and/or supportive housing, approved in accordance with this Chapter; and

2. The results of the certification of each ~~affordable housing set-aside~~income-restricted unit and a notification to the Director of any necessary actions to maintain the ~~affordable housing set-aside~~income-restricted units.

D. Enforcement and Noncompliance. In the event of noncompliance, the owner of the ~~affordable housing set-aside~~income-restricted units shall be subject to Chapter 22.242 (Enforcement Procedures), the remedies described in the covenant and agreement, and any other remedies at law.

...

SECTION 2021. Section 22.172.050 is hereby amended to read as follows:

22.172.050 Termination Conditions and Time Limits.

The following regulations shall apply to all nonconforming uses and buildings and structures nonconforming due to use, and to buildings and structures nonconforming due to standards as specified in this Section.

...

B. Termination by Operation of Law. Nonconforming uses and buildings or structures nonconforming due to use, and those buildings or structures nonconforming due to standards enumerated in this Section, shall be discontinued and removed from their sites within the time specified in this Section, except when extended or revoked as otherwise provided in this Title 22:

1. In the case of nonconforming uses and buildings or structures nonconforming due to use:

...

g. ~~Where the property is developed as a mobilehome park, which is constituted only of spaces rented to mobilehomes, then the length of time shall be as specified by this Subsection B.1.~~

...

SECTION 2122. Section 22.246.020 is hereby amended to read as follows:

22.246.020 Applicability of Zone Changes and Ordinance

Amendments.

A. Unless otherwise specified in this Title 22, if a complete application, as determined by the Director, was submitted to the Department prior to the effective date of a Zone Change (Chapter 22.198) or an Ordinance Amendment (Chapter 22.244):

...

2. If the applicant chooses to have the application be subject to the zoning and regulations that were applicable to the project prior to the effective date of such Zone Change or Ordinance Amendment:

a. The application may be modified prior to consideration by the Commission, Hearing Officer, or Director, and still be subject to the previously applicable zoning and regulations so long as the requested modification does not:

i. Change the project's housing type (e.g., from single-family residential to two-family or multi-family residential);

ii. Increase the project's residential density;

iii. Increase the project's floor area or lot coverage for non-residential space;

- iv. Change the project's tenure;
- v. Increase the amount of grading for the project; or
- vi. Increase the area of ground disturbance resulting

from the project.

...

SECTION 22.23. Section 22.250.010 is hereby amended to read as follows:

22.250.010 Filing Fees and Deposits.

A. For the purpose of defraying the expense involved in connection with any application or petition required or authorized by this Title 22, the following fees, as provided in Table 22.250.010-A, below, shall accompany the application or petition.

Table 22.250.010-A may be referred to as the Filing Fee Schedule.

TABLE 22.250.010-A: FILING FEE SCHEDULE		
...		
Minor Parking Deviation		\$1,441
Mobilehome Park Impact Report	For each impact report filed pursuant to Section 8.57.300 in Title 8 (Consumer Protection, Business and Wage Regulations) of the County Code	\$7,132
...		

B. Additional Fees.

...

3. Housing Permits.

...

b. **Housing Permit Monitoring Fees.** The applicant for an approved Housing Permit (Chapter 22.166) shall be required to pay monitoring fees directly to the LACDA, as follows:

i. An amount equal to \$170 x 55 years per unit ~~of for the rental affordable income-restricted units housing set-aside~~, except that for housing developments with more than 10 ~~affordable income-restricted housing set-aside units~~, the fee shall be the same amount as a housing development with 10 ~~affordable income-restricted housing set-aside units~~. The fee may be paid annually or capitalized as a one-time lump sum payment, as approved by the LACDA;

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ii. A one-time lump sum in the amount of \$2,934 per unit ~~of for the for-sale affordable income-restricted units housing set-aside~~;

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...

SECTION 2324. Section 22.250.020 is hereby amended to read as follows:

22.250.020 Fee Waivers, Exemptions, and Reductions.

...

B. Fee Exemption and Reduction for Affordable Housing. An applicant for a Housing Permit (Chapter 22.166) may request an exemption from or a reduction in the payment of any planning and zoning fees or deposits if a housing development provides ~~an affordable housing set-aside pursuant to Section 22.120.050 (Affordable Housing); income-restricted units~~ subject to the following:

...

2. Fee Reduction. Request for a fee reduction shall be granted, if the housing development provides an ~~affordable housing set-aside~~ income-restricted unit(s), but the applicant is not eligible for the fee exemption described in Subsection B.1, above. The rate of reduction shall be the total number of ~~affordable income-~~

restricted dwelling units divided by the total number of dwelling units. For the purpose of this Subsection B.2, "total number of dwelling units" means all dwelling units within the housing development, exclusive of a manager's unit or units, and inclusive of dwelling units permitted by the density bonus(es) awarded, if applicable.

...

C. Fee Exemption for Shelters and Accessory Overnight Safe Parking. An applicant may request an exemption from the payment of planning and zoning fees for a Ministerial Site Plan Review to develop a domestic violence shelter, emergency shelter, or accessory shelter, or accessory overnight safe parking. For the purpose of this Subsection C, "planning and zoning fees" are the fees provided in Section 22.250.010 (Filing Fees and Deposits) incurred by the Department. This Subsection C does not authorize any exemption from the payment of fees or deposits incurred by other County departments or agencies.

D. Fee Exemption for Mobilehome Parks. An applicant for a mobilehome park may request an exemption from the payment of any planning and zoning fees or deposits. For the purpose of this Subsection D, "planning and zoning fees or deposits" are the fees or deposits provided in Section 22.250.010 (Filing Fees and Deposits) incurred by the Department. This Subsection D does not authorize any exemption from, or reduction in, the payment of fees or deposits incurred by other County departments or agencies.

...

SECTION 2425. Chapter 22.268 is hereby added to read as follows:

Chapter 22.268 AFFORDABLE HOUSING REPLACEMENT FEE

Sections:

22.268.010 Applicability.

22.268.020 Amount.

22.268.030 Calculation.

22.268.040 Timing of Payment.

22.268.050 Annual Fee Update.

22.268.060 Use of Fees.

22.268.010 Applicability.

This section applies to projects eligible to pay an affordable housing replacement fee pursuant to Section 22.119.050.E.

22.268.020 Amount.

A. The amount shall be the applicable replacement fee per square foot multiplied by the gross floor area of the units requiring replacement. If the square footage of the units requiring replacement is not known, a per-unit fee shall apply.

B. The fees shall be applied by submarket area as defined in Section 22.14.010, **A under "Affordable housing and senior citizen housing"** and in accordance with Table 22.268.020-A.

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TABLE 22.268.020-A: AFFORDABLE HOUSING REPLACEMENT FEES		
Submarket Area	Fee Per Square Foot of Gross Building Area	Fee Per Unit
Antelope Valley	\$144	\$129,470

Coastal South Los Angeles	\$346	\$318,914
East Los Angeles/Gateway	\$270	\$228,116
San Gabriel Valley	\$268	\$292,277
Santa Clarita Valley	\$174	\$154,294
South Los Angeles	\$269	\$231,360

22.268.030 Calculation.

The replacement fee shall be calculated using the effective rate on the date the complete permit application for the principal project is submitted to the Department.

22.268.040 Timing of Payment.

A. If no discretionary approval is associated with the project, the replacement fee shall be due and payable prior to approval of the principal project by the Department.

B. If the project requires a discretionary approval other than a land division, the replacement fee shall be due and payable concurrently with fees submitted pursuant to Section 22.222.260.B (Performance Guarantee and Covenant).

C. If the project is a land division, the replacement fee shall be due and payable with final map submittal pursuant to Section 21.44.050 (Materials required for submittal) in Title 21 (Subdivisions).

22.268.050 Annual Fee Update.

The replacement fee shall be updated annually based on the annual increase in the Construction Costs Index (CCI) published by Engineering News Record for

Los Angeles, or a similar construction industry index selected by the Department in the event the CCI is discontinued.

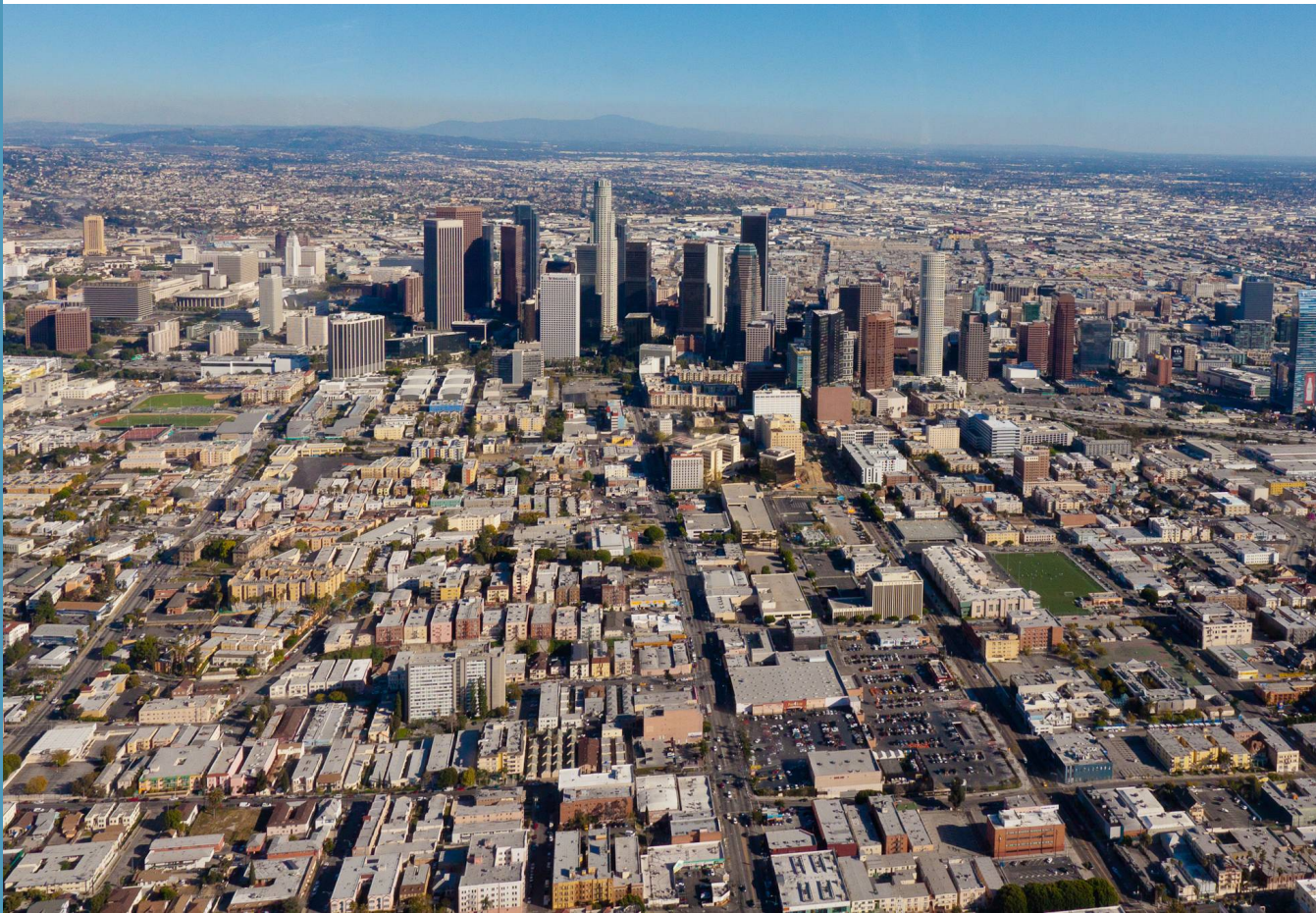
22.268.060 Use of Fees.

Replacement fees ~~shall be deposited into the County Affordable Housing Trust Fund, or equivalent, and~~ shall be used ~~within five years~~ by the County, a County-designated agency, or a qualified nonprofit for any of the purposes described in section 33334.2(e) of the California Health and Safety Code. ~~The use of such funds shall be prioritized within the same unincorporated submarket area of the project.~~

[CH848AHPSCCC]

County of Los Angeles

Affordable Housing Preservation Ordinance Addendum to the Certified Los Angeles County General Plan Update Final Environmental Impact Report



Prepared by:

**IMPACT
SCIENCES**

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County of Los Angeles
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October 2020

County of Los Angeles
Affordable Housing Preservation Ordinance
Addendum to the Certified Los Angeles
County General Plan Update
Final Environmental Impact Report

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October 2020

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1. INTRODUCTION

1.1 OVERVIEW

This Addendum, to the previously certified Los Angeles County General Plan Update Final Environmental Impact Report (State Clearinghouse # 2011081042; hereinafter "General Plan Update EIR"), is prepared in compliance with the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.; hereinafter "CEQA") and the Guidelines for the Implementation of CEQA (Cal. Code Regs., tit. 14, § 15000, et seq.; hereinafter "Guidelines"). The purpose of this Addendum is to assess any environmental impact differences between the proposed Affordable Housing Preservation Ordinance (AHPO), also referred to as the "Proposed Project" or "Project", and the adopted County of Los Angeles General Plan Update, herein referred to as "General Plan Update". More specifically, this Addendum is designed to determine whether and to what extent the General Plan Update EIR is sufficient for addressing the potential environmental impacts and mitigation measures for the Proposed Project.

Based on substantial evidence provided in this Addendum, the General Plan Update EIR and other materials in the record, the County of Los Angeles (County) determines that the Proposed Project falls within the General Plan Update EIR as the AHPO has no new significant environmental impacts; no substantial increase in the severity of previously identified significant effects; no mitigation measures or alternatives previously found infeasible and now feasible; and no mitigation measures or alternatives which are considerably different from those in the General Plan Update EIR. Thus, neither a subsequent nor supplemental environmental impact report (EIR) is required. (Pub. Resources Code, § 21166; Guidelines §§ 15162, 15163.) However, some changes or additions are necessary to the General Plan Update EIR, making this Addendum the appropriate CEQA document for the Proposed Project (Pub. Resources Code, §21166; Guidelines, §§ 15162 – 15164).

The proposed project involves amendments to Title 8 – Consumer Protection, Business and Wage Regulations; Title 21 – Subdivisions; and Title 22 – Planning and Zoning of the Los Angeles County Code. **Chapter 2.0** of this Addendum describes the proposed project in detail.

This Addendum is organized into the following sections:

Chapter 1.0, Introduction. Chapter 1.0 describes the purpose and organization of this document. The introduction includes applicable statutory sections of the Public Resources Code and Guidelines, a brief planning history, and identification of the General Plan Update EIR findings.

Chapter 2.0, Project Description. Chapter 2.0 describes the Proposed Project, including its characteristics and objectives. Proposed Project characteristics are discussed in the context of the current requirements and the changes to these requirements that would be implemented with the Proposed Project.

Chapter 3.0, Environmental Analysis: Chapter 3.0 provides an environmental analysis of the Proposed Project compared to the General Plan Update. It presents an analysis of the environmental factors identified in Appendix G of the Guidelines, determining for each factor whether the circumstances set forth in Public Resources Code section 21166 and its implementing Guidelines sections 15162 and 15163, governing when preparation of a subsequent EIR or supplemental EIR is required, respectively, are present with respect to the Proposed Project or the situation surrounding the Proposed Project.

Chapter 4.0, References. Chapter 4.0 provides a list of references used in the preparation of this Addendum and identifies the people involved in its preparation and review.

1.2 PROJECT LOCATION

The Project location includes all unincorporated areas in the County. **Figure 2-2** in **Chapter 2.0** of this Addendum depicts the aforementioned.

1.3 LEAD AGENCY AND ADDRESS

County of Los Angeles
Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

1.4 CONTACT PERSON AND PHONE NUMBER

Tina Fung, Supervising Regional Planner
County of Los Angeles
Department of Regional Planning, Housing Policy Section
Phone: (213) 974-6417
Email: tfung@planning.lacounty.gov

1.5 STATUTORY AUTHORITY

CEQA recognizes that between the date an environmental document for a project is completed and the date that a project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is set may change; and/or 3) previously unknown information can arise. Before proceeding with a project within the scope of a previously certified

EIR, CEQA requires the lead agency to evaluate these changes to determine whether they affect the conclusions in the prior environmental document.

When an EIR has been certified and a project within the scope of that evaluated in a previous EIR is modified or otherwise changed after certification, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Public Resources Code section 21166 and Guidelines sections 15162 through 15164.

Guidelines section 15162, subdivision a, provides that a subsequent EIR is not required unless any of the following occurs:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; and/or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If a subsequent EIR is required pursuant to Guidelines section 15162, subdivision a, a supplemental EIR may be prepared instead if "only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation" (Guidelines, § 15163, subd. (a)).

If a subsequent EIR is not required pursuant to Guidelines section 15162, subdivision a, then the lead agency shall determine the appropriate further CEQA documentation, including no further documentation at all (Guidelines, § 15162, subd. (a)).

However, if a subsequent EIR is not required pursuant to Guidelines section 15162, subdivision a, but some changes or additions to the General Plan Update EIR have become necessary, an Addendum is required (Guidelines, § 15164, subd. (a)). An Addendum must include a brief explanation of the agency's decision not to prepare a subsequent EIR, supported by substantial evidence in the record (Guidelines, §15164, subd (e)). The Addendum to the EIR need not be circulated for public review, but it may be included in or attached to the final EIR (Guidelines, § 15164, subd. (c)). The decision-making body must consider the Addendum and the final EIR prior to making a decision on the project. (Guidelines, § 15164, subd. (d)).

1.6 CEQA GUIDELINES UPDATES

Since adoption of the General Plan Update and certification of the General Plan Update EIR, the CEQA Guidelines were revised to include separate analysis of impacts to Energy, Tribal Cultural Resources and Wildfire. Impacts to Energy, including impacts to electricity and natural gas, are analyzed in Section 5.17 Utilities and Service Systems of the General Plan Update EIR. Section 5.5 Cultural Resources of the General Plan Update EIR included discussion and analysis of tribal cultural resources. Wildfire is discussed in the General Plan Update EIR Section 5.8 Hazards and Hazardous Materials. These impacts are discussed in the same sections within this Addendum as they were discussed in the General Plan Update EIR.

In January 2018, the California Office of Planning and Research transmitted its proposal for the comprehensive updates to the Guidelines to the California Natural Resources Agency. Among other things, this package included proposed updates related to analyzing transportation impacts pursuant to Senate Bill 743, proposed updates to the analysis of greenhouse gas emissions, and revised Guidelines section 15126.2, subdivision a, in response to the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369. The updated Guidelines became effective in December 2018. The revised Guidelines only apply to a CEQA document if the revised Guidelines are in effect when the document is sent out for public review (Guidelines, § 15007, subd. (c)).

1.7 BACKGROUND AND PLANNING HISTORY

On October 6, 2015, the County certified the General Plan Update EIR and adopted the General Plan Update for the County. The General Plan Update was a comprehensive update of the County General Plan (General Plan) and associated actions. The General Plan includes goals, policies, implementation programs, ordinances and zone changes. The General Plan covers the unincorporated areas and accommodates new housing and employment opportunities in anticipation of population growth. The General Plan Update responded to California State (State) laws current at the time it was written. The General Plan Update included revisions to the land use map and new text, proposing progressive, innovative programs and policies. The General Plan Update focuses growth in the unincorporated areas with access to services and infrastructure and reduces the potential for growth in environmentally sensitive and hazardous areas. The General Plan Update EIR evaluates housing unit growth based on land use designations. Residential growth in housing units was assumed to be 80 percent of capacity (unless the maximum density is less than one unit per acre, in which case the maximum density was used).¹

The established objectives of the General Plan Update, as cited in the General Plan Update EIR, are as follows:

- Provide a comprehensive update to the General Plan that establishes the goals and policies to create a built environment that fosters the enjoyment, financial stability, and well-being of the unincorporated areas and County.
- Improve the job-housing balance and fiscal sustainability by planning for a diversified employment base, providing a variety of commercial, industrial, and mixed-use land uses.
- Promote sustainability by locating new development near existing infrastructure, services, and jobs.
- Maintain environmentally sustainable communities and reduce greenhouse gas (GHG) emissions that contribute to climate change.
- Support a reasonable share of projected regional population growth.
- Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities.

¹ It should be noted that estimates of growth in housing units in the General Plan Update EIR (i.e., 80 percent of maximum capacity in the residential zones) far exceed forecasted growth as determined by Southern California Association of Governments (SCAG) in recent adopted growth forecasts.

- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the character and ecological importance of the unincorporated areas.
- Provide policy guidance to protect and conserve natural resources and to improve the quality of air, water, and biological resources.
- Coordinate equitable sharing of public and private costs associated with providing appropriate community services and infrastructure, and in a context-sensitive manner that addresses community character.
- Ensure that development accounts for physical constraints and the natural hazards of the land.
- Recognize community and stakeholder interests while striving for consensus.
- Protect and enhance recreational opportunities and public access to open space and natural resources.

The General Plan Update EIR provides a programmatic analysis of the potential impacts of the buildout of the General Plan Update. In conjunction with the certification of the Final EIR in October 2015, the Board of Supervisors also adopted Findings of Fact, a Mitigation Monitoring and Reporting Program (MMRP), and a Statement of Overriding Considerations. The CEQA Findings adopted by the County indicate the General Plan Update would result in certain significant environmental impacts that could not be fully avoided by implementation of the feasible mitigation measures. These include impacts to air quality, transportation, utilities, and global climate change. Information and technical analyses from the General Plan Update EIR are summarized throughout this Addendum. The entire General Plan Update EIR is available for review at County offices located 320 W. Temple Street, 13th Floor, Los Angeles, CA 90012 , and online at: <http://planning.lacounty.gov/generalplan/ceqa>.

1.8 OTHER PLANNING PROJECTS THAT IMPLEMENT GENERAL PLAN POLICIES

On February 20, 2018, the County Board of Supervisors directed the County Department of Regional Planning (DRP) to prepare an Affordable Housing Preservation Ordinance along with other ordinances to address the affordable housing needs in the unincorporated areas of the County. The AHPO is one out of four ordinances that the County has drafted at the direction of the Board of Supervisors to address the affordable housing needs in the County. The other three ordinances are briefly described below.

By-Right Housing Ordinance: The By-Right Housing Ordinance will streamline multi-family residential developments by allowing them by-right in certain zones. The By-Right Housing Ordinance will also include additional policies to further incentivize and streamline multifamily residential developments.

“By-right” development is exempt from CEQA, and no public hearing is required. Allowing multi-family residential developments “by-right” in areas where appropriate and streamlining the review process can help property owners and developers save time and money, which in turn helps increase housing production. In addition, the By-Right Housing Ordinance (BRHO) clarifies how to determine the allowable density and includes a zone change program for internal consistency.

Interim and Supportive Housing Ordinance: The Interim and Supportive Housing Ordinance (ISHO) will ensure compliance with State law regarding shelters, and transitional and supportive housing, as well as other housing types for specific populations. ISHO includes local policies to further encourage development of shelters, transitional and supportive housing, and support the County’s efforts to provide solutions to vehicle living. The draft ISHO includes several components, including proposals to: allow accessory shelter use by-right in appropriate zones; offer reduced parking for shelters; enable and streamline conversion of hotels and motels to transitional housing or shelters in zones that permit multifamily and mixed use; and add standards for safe parking lots.

Inclusionary Housing Ordinance: The Inclusionary Housing Ordinance (IHO) requires new and substantial rehabilitation residential projects to set aside a percentage of units for affordable housing. The percentages range from 5-20 percent based on housing type, project size, project location and affordability level. The requirement to provide affordable housing may also be satisfied through limited off-site construction. The IHO would work in tandem with the County’s Density Bonus Ordinance in that projects providing affordable housing are also eligible for density bonus, reduced parking, streamlined environmental review and other incentives and/or waivers associated with development standards as provided in the County Density Bonus Ordinance.

In addition to the Proposed Project and three ordinances discussed above, one additional housing related ordinance is also being prepared by the Department of Regional Planning (DRP).

Accessory Dwelling Unit Ordinance: On January 1, 2020, new laws for accessory dwelling units (ADU) and junior accessory dwelling units (JADUs) were enacted by the State that rendered the County’s ADU Ordinance null and void. An ADU, also known as a granny or in-law unit, is a dwelling unit that is either attached to, located within the existing living area of, or detached from and located on the same lot as a single-family or multi-family residential building. A JADU is a dwelling unit that is no more than 500 square feet in size and contained entirely within single-family residence. ADUs and JADUs can be a source of rental income for homeowners or provide additional living space for family members or caregivers.

The By-Right Housing Ordinance, Interim and Supportive Housing Ordinance, and Inclusionary Housing Ordinance are considered cumulative projects to this Project as they have the ability to create additional

units through zoning changes focused on housing. In addition, the ADU Ordinance is also considered a cumulative project due to its similar time frame.

These ordinances would all work to address the County’s affordable housing needs. Therefore, in this Addendum, the cumulative analysis considers the impacts of the Proposed Project together with these related (but separate) housing ordinances.

1.9 MITIGATION REQUIREMENTS

The General Plan Update EIR included mitigation measures to reduce environmental impacts associated with the implementation of the General Plan Update. The General Plan Update EIR includes two types of mitigation: measures to be undertaken by the County and project-level measures to be undertaken by future project applicants, as appropriate, where potential significant impacts could occur when developing individual projects. **Table 1-1** shows all the mitigation measures from the General Plan Update EIR.

**Table 1-1
General Plan Update EIR Mitigation Measures**

Air Quality	
AQ-1	<p>If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable Air Quality Management District (AQMD) adopted thresholds of significance, the County of Los Angeles Planning Department shall require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:</p> <ul style="list-style-type: none"> • Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. • Ensuring construction equipment is properly serviced and maintained to the manufacturer’s standards. • Limiting nonessential idling of construction equipment to no more than five consecutive minutes. • Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. • Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). • Pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. • Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust. • Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material. • Hydroseed or apply non-toxic soil stabilizers to inactive construction areas. • Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
AQ-2	<p>New industrial or warehousing land uses that: 1) have the potential to generate 40 or more diesel trucks per day and 2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County of Los Angeles Planning Department prior to future discretionary project</p>

	<p>approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project.</p>
<p>AQ-3</p>	<p>Applicants for sensitive land uses within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities:</p> <ul style="list-style-type: none"> • Industrial facilities within 1000 feet • Distribution centers (40 or more trucks per day) within 1,000 feet • Major transportation projects (50,000 or more vehicles per day) within 1,000 feet • Dry cleaners using perchloroethylene within 500 feet • Gasoline dispensing facilities within 300 feet <p>Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:</p> <ul style="list-style-type: none"> • Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters <p>Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County of Los Angeles and shall be verified by the County’s Planning Department.</p>
<p>AQ-4</p>	<p>If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to County of Los Angeles. Facilities that have the potential to generate nuisance odors include but are not limited to:</p> <ul style="list-style-type: none"> • Wastewater treatment plants • Composting, greenwaste, or recycling facilities • Fiberglass manufacturing facilities • Painting/coating operations • Large-capacity coffee roasters • Food-processing facilities <p>If an odor management plan is determined to be required through CEQA review, the County shall require the project applicant to submit the plan prior to approval to ensure compliance with the applicable Air Quality Management District’s Rule 402, for nuisance odors. If applicable, the Odor Management Plan shall identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.</p>
<p>Biological Resources</p>	
<p>BIO-1</p>	<p>Biological resources shall be analyzed on a project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the project site, and focused surveys should be conducted as necessary to determine the presence/absence of special-status species (e.g., focused sensitive plant or wildlife surveys). A biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map,</p>

	site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as an analysis of those species with potential to occur onsite).
BIO-2	If there is potential for direct impacts to special-status species with implementation of construction activities, the project-specific biological resources assessment report (as mentioned in Mitigation Measure BIO-1) shall include mitigation measures requiring preconstruction surveys for special-status species and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities, as appropriate. If special-status species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or monitoring, construction activity shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. Relocations into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas should be the preferred goal of this measure. A qualified biologist shall be on site to conduct surveys, to perform or oversee implementation of protective measures, and to determine when construction activity may resume.
BIO-3	No feasible mitigation measures are available that would reduce impacts to wildlife movement completely. However, corridors shall not be entirely closed by any development, and partial mitigation shall be mandatory for impact on wildlife corridors and wildlife nursery sites. This shall include provision of a minimum of half the corridor width. (The width shall be at least what is needed to remain connective for the top predators using the corridor.) Mitigation can include preservation by deed in perpetuity of other parts of the wildlife corridor connecting through the development area; it can include native landscaping to provide cover on the corridor. For nursery site impacts, mitigation shall include preservation by deed in perpetuity for another comparable nursery site of the same species.
Cultural Resources	
CUL-1	Provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources.
CUL-2	Draft a comprehensive historic preservation ordinance for the unincorporated areas.
CUL-3	Prepare an Adaptive Reuse Ordinance within the context of, and in compliance with, existing building codes that considers the conversion of older, economically distressed or historically-significant buildings into multifamily residential developments, live-and-work units, mixed use developments, or commercial uses.
CUL-4	<p>Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified archaeologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.</p> <p>If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the archaeologist’s follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.</p> <p>Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County.</p> <p>Unanticipated discoveries shall be evaluated for significance by a County-certified archaeologist. If the archaeological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the California State University Fullerton; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation (Building, Structure, and Object Record; Archaeological Site Record; or District Record, as applicable).</p>
CUL-5	<p>Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified paleontologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue paleontological resources as necessary. The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontologist resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.</p> <p>If the paleontological resources are found to be significant, the paleontologist observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the paleontologist’s follow-up report from the County. The report shall</p>

	<p>include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.</p> <p>Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County. Unanticipated discoveries shall be evaluated for significance by a County-certified a paleontologist. If the paleontological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the California State University Fullerton; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation.</p>
Greenhouse Gas Emissions	
GHG-1	<p>The County shall monitor GHG emissions by updating its GHG emissions inventory every five years. Upon the next update to the CCAP, the inventory, GHG reduction measures, and GHG reductions should be forecasted to 2035 to ensure progress toward achieving an interim target that aligns with the long-term GHG reduction goals of Executive Order S 03 05. The CCAP update should take into account the reductions achievable due to federal and state action as well as ongoing work by the County government and the private sector. The 2035 CCAP update shall be complete by January 1, 2021 with a plan to achieve GHG reductions for 2035 or 2040 provided the state has an actual plan to achieve reductions for 2035 or 2040. New reduction programs in similar sectors as the proposed CCAP (building energy, transportation, waste, water, wastewater, agriculture and others) will likely be necessary. Future targets should be considered in alignment with state reduction targets, as feasible, but it is premature at this time to determine whether or not such targets can be feasibly met through the combination of federal, state, and local action given technical, logistical and financial constraints. Future updates to the CCAP should account for the horizon beyond 2035 as the state adopts actual plans to meet post-2035 targets.</p>
Hydrology and Water Quality	
HYD-1	<p>Prior to approval of a tentative map, future project applicants/developers shall provide proof to the Department of Public Works that all structures are located outside the 100-year floodplain.</p>
Noise	
N-1	<p>Construction activities associated with new development that occurs near sensitive receptors shall be evaluated for potential noise impacts. Mitigation measures such as installation of temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing non-essential idling of construction equipment to no more than five minutes shall be incorporated into the construction operations to reduce construction-related noise to the extent feasible.</p>
N-2	<p>Prior to the issuance of building permits for any project that involves a noise sensitive use within the 65 dBA CNEL contour (i.e., areas in or above 65 dBA CNEL) along major roadways and freeways the project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features (e.g., setbacks, berms, or sound walls), and/or required building acoustical improvements (e.g., sound transmission class rated windows, doors, and attic baffling) to ensure compliance with the County’s Noise Compatibility Criteria and the California State Building Code and California Noise Insulation Standards (Title 24 of the California Code of Regulations).</p>
N-3	<p>New development that occurs within 200 feet of a railroad track (according to the FTA’s vibration screening distances) shall be evaluated for potential vibration impacts. The project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features and/or required building construction improvements to ensure that vibration impacts would remain below acceptable levels of 0.08 RMS in/sec for residential uses.</p>
N-4	<p>Individual projects that use vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, near sensitive receptors shall be evaluated for potential vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the Federal Transit Administrations vibration annoyance criterion of 78 VdB at sensitive receptor locations), additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., drilled piles to eliminate use of vibration-intensive pile driver).</p>
N-5	<p>Prior to the issuance of building permits, proposed heavy industrial projects are required to provide evidence that vibration due to the operation of machinery would not adversely affect nearby vibration sensitive uses such as commercial, hotel, institutional, and residential uses. The project property owner/developers shall retain an acoustical engineer to conduct a vibration analysis and identify, where appropriate, project design features and/or required building/ equipment improvements to ensure that vibration impacts would remain below acceptable levels of 78 VdB at sensitive receptor locations. This vibration level is considered to be significant at vibration-</p>

	sensitive uses. This can be accomplished with vibration-reducing measures such as, but not limited to, equipment placement, equipment selection, vibration dampers, and/or changes to operation modes (speed, power, frequency).
Population and Housing	
PH-1	Prior to adoption of the Antelope Valley Area Plan Update, the County shall identify land use changes to achieve a minimum jobs-housing ratio of 1.3 for the Antelope Valley Planning Area.
Public Services	
PS-1	Prior to issuance of building permits, future project applicants/developers shall pay the Los Angeles County Fire Department Developer Fee in effect at that time.
PS-2	Each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. Final fire flows shall be determined by LACoFD in accordance with Appendix B of the County Fire Code The required fire apparatus road and water requirements shall be in place prior to construction.
PS-3	Prior to approval of a tentative map, a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area, as required by Section 1117.2.1 of the County Fire Code and approved by LACoFD prior to building permit issuance.
PS-4	Prior to adoption of the Antelope Valley Area Plan, the County shall identify an implementation program to ensure adequate funding is available to provide law enforcement services within the Antelope Valley Planning Area. The funding mechanism must provide sufficient revenue to pay for land acquisition, engineering, construction, installation, purchasing, or any other direct costs for capital law enforcement facilities and equipment needed to serve the new development in the Antelope Valley Planning Area.
Transportation/Traffic	
T-1	The County shall continue to monitor potential impacts on roadway segments and intersections on a project by project basis as buildout occurs by requiring traffic studies for all projects that could significantly impact traffic and circulation patterns. Future projects shall be evaluated and traffic improvements shall be identified to maintain minimum levels of service in accordance with the County’s Traffic Impact Analysis Guidelines, where feasible mitigation is available. ²
T-2	The County shall implement over time objectives and policies contained within the General Plan Mobility Element. Implementation of those policies will help mitigate any potential impacts of Project growth and/or highway amendments on the transportation system.
T-3	The County shall participate with Metro, the Congestion Management Program (CMP) Agency in Los Angeles County, on a potential Congestion Mitigation Fee program that would replace the current CMP Debit/Credit approach. Under a countywide fee program, each jurisdiction, including the County, will select and build capital transportation projects, adopt a fee ordinance, collect fees and control revenues. A fee program will require a nexus analysis, apply only to net new construction on commercial and industrial space and additional residential units and needs to be approved by Metro and the local jurisdictions. A countywide fee, if adopted, will allow the County to mitigate the impacts of development via the payment of the transportation impact fee in lieu of asking each development project for individual mitigation measures, or asking for fair share payments of mitigation. The fee program would itself constitute a “fair share” program that would apply to all development (of a certain size) within the unincorporated areas.
T-4	The County shall work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent unincorporated areas. This includes adding or extending mixed flow general purpose lanes, adding or extending existing HOV lanes, adding Express Lanes (high occupancy toll lanes), incorporating truck climbing lanes, improving interchanges and other freeway related improvements.
T-5	The County shall require traffic engineering firms retained to prepare traffic impact studies for future development projects to consult with Caltrans, when a development proposal meets the requirements of Statewide, regional, or area wide significance per CEQA Guidelines §15206(b). Proposed developments meeting the criteria of Statewide, regional or area wide include: <ul style="list-style-type: none"> Proposed residential developments of more than 500 dwelling units

² Since certification of the General Plan EIR, CEQA was revised such that delay based metrics, including levels of service (and associated mitigation measures) are no longer required. Instead, CEQA now requires vehicle miles traveled (VMT) be the primary metric for evaluating transportation impacts.

	<ul style="list-style-type: none"> Proposed shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. Proposed commercial office buildings employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space Proposed hotel/motel developments of more than 500 rooms When the CEQA criteria of regional significance is not met, Caltrans recommends transportation engineers and/or city representatives consult Caltrans when a proposed development includes the following characteristics: <ul style="list-style-type: none"> All proposed developments that have the potential to cause a significant impact to state facilities (right of way, intersections, interchanges, etc.) and when required mitigation improvements are proposed in the initial study. Mitigation concurrence should be obtained from Caltrans as early as possible. Any development which assigns 50 or more trips during peak hours to a state highway (freeways). Any development located adjacent to or within 100 feet of a State highway facility and may require a Caltrans Encroachment Permit. (Exceptions: additions to single family homes or 10 residential units of less). When it cannot be determined whether or not Caltrans will expect a traffic impact analysis pursuant to CEQA.
Utilities and Service Systems	
USS-1	Require the use of drought tolerant landscaping, native California plant materials, and evapotranspiration (smart) irrigation systems.
USS-2	Require the use of low-flow fixtures in all non-residential development and residential development with five or more dwelling units, which may include but are not limited to water conserving shower heads, toilets, waterless urinals and motion-sensor faucets, and encourage use of such fixtures in building retrofits as appropriate.
USS-3	Require low water use landscaping in new residential subdivisions and other private development projects, including a reduction in the amount of turf-grass.
USS-4	Promote the use of low-flow and/or waterless plumbing fixtures and appliances in all new non-residential development and residential development of five or more dwelling units.
USS-5	Support amendments to the County Building Code that would promote upgrades to water and energy efficiency when issuing permits for renovations or additions to existing buildings.
USS-6	Apply water conservation policies to all pending development projects, including approved tentative subdivision maps to the extent permitted by law. Where precluded from adding requirements by vested entitlements, encourage water conservation in construction and landscape design.
USS-7	Require new development to provide the infrastructure needed for delivery of recycled water to the property for use in irrigation, even if the recycled water main delivery lines have not yet reached the site, where deemed appropriate by the reviewing authority.
USS-8	Promote the installation of rainwater capture and gray water systems in new development for irrigation, where feasible and practicable.
USS-9	Promote energy efficiency and water conservation upgrades to existing nonresidential buildings at the time of major remodel or additions.
USS-10	Promote the use of permeable paving materials to allow infiltration of surface water into the water table.
USS-11	Maintain stormwater runoff on site by directing drainage into rain gardens, natural landscaped swales, rain barrels, permeable areas, and use of drainage areas as design elements, where feasible and reasonable.
USS-12	Seek methods to decrease impermeable site area where reasonable and feasible, in order to reduce stormwater runoff and increase groundwater infiltration, including use of shared parking and other means, as appropriate.
USS-13	On previously developed sites proposed for major alteration, provide stormwater management improvements to restore natural infiltration, as required by the reviewing authority.
USS-14	Encourage and promote the use of new materials and technology for improved stormwater management, such as pervious paving, green roofs, rain gardens, and vegetated swales.
USS-15	Where detention and retention basins or ponds are required, seek methods to integrate these areas into the landscaping design of the site as amenity areas, such as a network of small ephemeral swales treated with attractive planting.
USS-16	Evaluate development proposals for consistency with the County Green Building Standards Code.

USS-17	Promote Low Impact Development standards on development sites, including but not limited to minimizing impervious surface area and promoting infiltration, in order to reduce the flow and velocity of stormwater runoff throughout the watershed.
USS-18	Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.
USS-19	Monitor growth and coordinate with water districts as needed to ensure that long-range needs for potable and reclaimed water will be met.
USS-20	If water supplies are reduced from projected levels due to drought, emergency, or other unanticipated events, take appropriate steps to limit, reduce, or otherwise modify growth permitted by the General Plan in consultation with water districts to ensure adequate long-term supply for existing businesses and residents.
USS-21	Upon the availability of non-potable water, discourage and consider restrictions on the use of potable water for washing outdoor surfaces.
USS-22	In cooperation with the Sanitation Districts and other affected agencies, expand opportunities for use of recycled water for the purposes of landscape maintenance, construction, water recharge, and other uses as appropriate.
USS-23	In coordination with applicable water suppliers, adopt and implement a water conservation strategy for public and private development.

1.10 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS IDENTIFIED IN GENERAL PLAN UPDATE EIR COMPARED TO IMPACTS OF AHPO

This Addendum will consider whether the new housing units expected from the AHPO would result in a new significant environmental impact or more severe significant environmental impacts than previously identified in the General Plan Update EIR, thereby, requiring a major revision to the EIR. Below is a summary of the analysis as to whether this Addendum to the General Plan Update EIR identified new or more severe significant environmental impacts than those identified in the General Plan Update EIR related to the AHPO.

Chapter 3.0 of this Addendum includes a detailed evaluation of environmental effects associated with the AHPO, as compared to impacts identified in the General Plan Update EIR for each CEQA environmental factor, organized in the same manner as the General Plan Update EIR. Anticipated affordable housing development under the AHPO represents a small fraction of the total reasonably foreseeable development analyzed in the General Plan Update EIR. The General Plan Update EIR evaluated all forecast land use development in (based on zoning capacity) the County that would be constructed and implemented/occupied between 2013 (the General Plan Update EIR baseline year) and 2035. The AHPO would ensure that the existing affordable housing stock is maintained. Affordable housing units represent a fraction of the total development anticipated in the General Plan Update EIR. It is also possible that the AHPO would inhibit development because of the requirements being considered too onerous, potentially leading to less development than would otherwise occur.

Table 1-2 below provides a summary of impacts as identified in the General Plan and analyzed in this Addendum. However, only a limited summary of impacts is provided for the AHPO condominium

conversion notification policy and mobilehome park policies due to the following: The AHPO includes notification policies with respect to condominium conversions; these policies do not have the potential to result in physical environmental impacts. The AHPO also provides a new administrative pathway to legalize existing density in excess of what is permitted, for existing mobilehome parks. Some mobilehome parks have existing infrastructure deficiencies, for which the ordinance would facilitate repair, maintenance, as well as like-for-like rebuild if damaged or destroyed. Such repairs and replacements would also result in minor if any physical environmental impacts. The aforementioned are discussed more in **Chapters 2.0** and **3.0**.

Table 1-2
Summary of Impacts
General Plan Update EIR Impacts Compared to AHPO Impacts

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Aesthetics		
Adverse effect on a scenic vista.	Less than significant. The existing regulatory setting, as well as the goals and policies contained in the General Plan Update, would serve to lessen potential impacts to scenic vistas. Additionally, approval of the General Plan Update does not authorize construction of development that would affect scenic vistas. Therefore, under the General Plan Update EIR, impacts were found to be less than significant, and no mitigation measures were required.	Less than significant. Because the AHPO generally requires replacement of affordable units on a one-to one- basis, it is not anticipated to substantially change the location that development would occur. For inclusionary projects, the ordinance would allow for off-site replacement in accordance with specified criteria (off-site replacement would only be allowed for projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not increase development compared to what was analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Substantially damage scenic resources within a state scenic highway.	Less than significant. The General Plan Update EIR concluded that no development or changes would occur along or near any of the three adopted state scenic highways within Los Angeles County. While some development or changes could occur near the eligible scenic highways, the development or changes anticipated to occur would be minimal and would only occur near small stretches of the eligible scenic highways. Furthermore, goals and policies of the General Plan would serve to minimize potential impacts to scenic highways. Therefore, the General Plan Update EIR concluded that no significant impact would	No impact. State scenic highways in unincorporated parts of the County are located within Very High Fire Hazard Severity Zones (VHFHSZ), where the replacement requirements of AHPO do not apply. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	result from implementation of the General Plan with respect to substantial alteration of scenic resources within a designated scenic highway.	
Degradation of visual character.	Less than Significant. The General Plan Update EIR concluded the guiding principles, goals, policies, and implementation programs contained in the General Plan would serve to lessen or mitigate potential impacts by providing direction for future decision making, as well as by requiring additional future review of potential impacts of individual development projects that would be accommodated by the General Plan. Therefore, the General Plan Update EIR found impacts related to changes in visual character to be less than significant.	Less than Significant. As concluded in the General Plan Update EIR, changes in land use would generally be limited to areas that feature existing urban development. General Plan goals and policies would remain in effect to lessen and mitigate any potential impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Increase in light and glare.	Less than Significant. The General Plan Update EIR concluded that development would generally occur in urbanized areas where existing lighting and light pollution are already high, these increases in light and glare would not be substantial. In rural areas of the County growth could also potentially diminish nighttime views and/or dark skies, but applicable regulations would minimize these impacts. The General Plan Update EIR found impacts related to light and glare would be less than significant.	Less than Significant. The AHPO could lead to incrementally larger projects than would otherwise have occurred without the AHPO. However, these projects would likely be in urban areas that would not be substantially affected by these incremental increases in shade/shadow. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Agricultural and Forest Resources		
Convert Prime, Unique, or Important Farmland.	Significant and Unavoidable. The General Plan Update EIR concluded that implementation of the Agricultural Resource Area (ARA) policies under the General Plan would reduce both direct and indirect impacts of conversion of mapped Important Farmland. However, these ARAs would not be agricultural preserves and some conversion to non-agricultural uses would be permitted. As such, impacts due to buildout of the General Plan were identified as significant in the Antelope Valley Planning Area and Santa Monica Mountains Planning Area. However, impacts in the remaining nine Planning areas were identified as less than significant.	Less than Significant. Because the AHPO does not incentivize development and off-site replacement is restricted in location (off-site replacement of affordable units would only be allowed for projects subject to the Inclusionary Housing Ordinance that do not use a density bonus and few such projects are anticipated to occur), the AHPO would not result in substantial construction in areas of Important Farmland as these areas do not contain large numbers of affordable housing units, nor are they zoned for such use. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Conflict with zoning for agricultural use, or a Williamson Act contract.	No Impact. The General Plan Update EIR concluded that implementation of the zoning changes within the General Plan would not involve any rezoning of farmland and impacts regarding conversion of farmland to non-agricultural uses would be less than significant. Furthermore, the General Plan	No Impact. The AHPO would require replacement of lost affordable units. Any losses of agriculturally zoned land are generally anticipated to involve small areas and/or already be used for housing. Therefore, impacts to Williamson Act contracts as a result of the development in accordance with the AHPO would not substantially change as

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	Update EIR identified that the only Williamson Act contracts in effect in Los Angeles County are located on Santa Catalina Island, of which there is no Important Farmland mapped.	compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Rezoning forestland or timberland.	No Impact. The General Plan Update EIR found that the General Plan includes the addition of two new zones created for future use in rural areas. However, neither of these zones are added to the Zoning Map. The remaining zones added as part of the General Plan would only be designated in intensely urban areas and would thus not impact forest land. As the County has no existing zoning specifically designating forest use, implementation of the General Plan would not conflict with existing zoning for forest land or timberland.	No Impact. The replacement requirements of the AHPO do not apply in VHFHSZs, a designation that applies to forest land in unincorporated Los Angeles County. The AHPO is generally anticipated to apply to areas of the County where development exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Loss or conversion of forest land to non-forest use.	Less than Significant. The General Plan Update EIR indicates that Forest land within Los Angeles County is protected through the County’s Significant Ecological Area (SEA) Ordinance. Compliance with the SEA Ordinance would reduce potential impacts to forest land to a less than significant level.	Less than Significant. While affordable housing units may be located in forest areas, any redevelopment including replacement units would generally be expected to impact areas already developed. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.
Conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.	Significant and Unavoidable. The General Plan EIR found that in the Antelope Valley Planning Area and Santa Clarita Valley Planning Area there would be a significant indirect impact on conversion of mapped Important Farmland to nonagricultural use due to pressure to convert farmland to non-agricultural uses and related incompatibilities between agricultural and urban uses. The General Plan Update EIR indicated that there are no feasible mitigation measures to reduce impacts to farmland in these areas. Impacts in the nine other Planning Areas would be less than significant.	No Impact. The AHPO would not substantially change allowable land uses or result in a substantial net increase in units as it generally requires a one-for-one replacement of affordable units. Forests and farmlands would not be significantly impacted. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Air Quality		
Conflict with or the potential to obstruct implementation of the applicable air quality plan.	Significant and Unavoidable. The General Plan Update EIR indicates buildout of the General Plan in 2035 would result in higher populations for the unincorporated areas of the County. The General Plan Update EIR concludes that individual development projects would be consistent with the control measures and regulations identified in the SCAQMD and AVAQMD’s AQMPs. However, the General Plan EIR found that development would not be consistent with the AQMPs because the buildout in the unincorporated	Less than Significant. Since the release of the General Plan Update EIR, the SCAQMD adopted an updated AQMP in 2017 that incorporates SCAG’s updated population projection numbers from the 2016/2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that would account for the population increase in unincorporated areas of the County. However, the AVAQMD’s Ozone Attainment Plan has not been updated and as a result there is the potential for development from the General Plan Update to exceed the AVAQMD’s plan. Generally, the AHPO would not result in a

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	areas would exceed forecasts in the AQMP.	substantial increase in development or units. The AHPO would not increase development as compared to what was evaluated in the General Plan Update EIR. The AHPO would not substantially change impacts related to any air quality management plan as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Violate any air quality standard or contribute substantially to existing or projected air violation.	Significant and Unavoidable. The General Plan Update EIR concluded that for a broad-based General Plan, it is not possible to determine whether the scale and phasing of individual projects could result in the exceedance of the SCAQMD's or the AVAQMD's short-term regional or localized construction emissions thresholds. Mitigation Measure AQ-1, regulatory measures, as well as goals and policies in the General Plan would reduce air pollutant emissions. However, due to the likely scale and extent of construction activities pursuant to the future development that would be accommodated by the General Plan, at least some projects would likely continue to exceed the SCAQMD and AVAQMD thresholds. Therefore, the General Plan EIR determined construction-related air quality impacts of the buildout of the General Plan would be significant and unavoidable.	Significant and Unavoidable. As indicated in the General Plan Update EIR, the risk posed from Valley Fever would be reduced to less than significant levels with the implementation of the SCAQMD or AVAQMD's fugitive dust measures. However, even with the implementation of Mitigation Measure AQ-1 , regulatory measures, as well as general plan goals and policies, it is likely that some projects would exceed the relevant SCAQMD and AVAQMD criteria air pollutant thresholds, as described above, these impacts were fully disclosed within the General Plan Update EIR and no new or greater impacts would occur. Individual projects would result in emissions as a result of mobile sources (vehicles) and stationary sources (heating, ventilation and air conditioning, lighting, landscape equipment). The AHPO would not substantially change construction or operational air quality impacts relative to violation of air quality standards as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Cumulatively considerable net increase of any criteria pollutant	Significant and Unavoidable. The General Plan Update EIR concluded that buildout of the land use plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Mitigation Measure AQ-1 as well as General Plan goals and policies would reduce these impacts. However, due to the magnitude of emissions generated by the buildout, mitigation measures would not reduce impacts below SCAQMD's or AVAQMD's thresholds.	Significant and Unavoidable. Generally, the AHPO would not result in a substantial increase in units. The AHPO would not result in growth greater than evaluated in the General Plan Update EIR or growth anticipated in the 2016 AQMP.
Expose sensitive receptors to substantial pollutant concentrations.	Less than Significant with Mitigation. The General Plan Update EIR indicated that, due to the broad-based nature of the EIR, it was not possible to determine whether the scale and phasing of individual projects would result in the exceedance of localized emissions thresholds. Nevertheless, because of the likely scale of future development that would be accommodated under the General Plan, at	Less than Significant with Mitigation. The AHPO would not generate new sources of mobile or stationary-source TAC emissions typically associated with industrial or commercial processes. Mitigation Measure AQ-3 requires projects that will site new sensitive receptors within a certain distance of land uses associated with high levels of TAC emissions to prepare a health risk assessment and, if necessary, apply additional on-site

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	<p>least some projects were expected to individually result in exceedances of the CAAQS and/or NAAQS. New land uses in the unincorporated areas are expected to generate truck trips that could generate an increase in DPM that would contribute to cancer and non-cancer risks in the SoCAB and/or Antelope Valley portion of the MDAB. These increased truck trips could impact existing sensitive receptors. Since the nature of these emissions could not be determined at the time of General Plan preparation, the impacts are considered significant. Mitigation Measure AQ-3 would ensure that placement of sensitive receptors near major sources of air pollution would achieve the incremental risk thresholds established by SCAQMD and AVAQMD, and impacts would be less than significant.</p>	<p>mitigation. The AHPO would not substantially change air quality impacts relative to sensitive receptors as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Create objectionable odors.</p>	<p>Less than Significant with Mitigation. The General Plan Update EIR concluded that industrial land uses associated with the General Plan could create objectionable odors. However, Mitigation Measure AQ-4 would ensure that odor impacts are minimized and facilities would comply with SCAQMD and AVAQMD Rule 402. Therefore, impacts were considered less than significant.</p>	<p>Less than significant. The AHPO would not encourage the development of industrial land uses that could create objectionable odors. Residential use is not associated with odor nuisance and therefore this impact is less than significant. The AHPO would not substantially change odor impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Biological Resources</p>		
<p>Effect on candidate, sensitive, or special status species.</p>	<p>Significant and Unavoidable. The General Plan Update EIR concluded that the buildout of the General Plan will result in impacts to various habitat types, which will result in the loss of special-status species through direct mortality or via indirect effects (e.g., through wildlife habitat loss and edge effects at the urban-wildland interface). Mitigation Measures BIO-1 and BIO-2 would reduce direct impacts, there is no mitigation provided for the indirect impacts to special-status species through the loss of common (i.e., non-sensitive) habitats. Thus, impacts are considered significant and unavoidable.</p>	<p>Less than Significant. Any AHPO projects which occur within SEA designated areas would be subject to all existing regulations in the SEA. Mitigation Measures BIO-1 and BIO-2 would remain in effect to mitigate potential direct impacts to a less than significant level. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. However, indirect impacts would remain significant and unavoidable, as was determined in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Effect on riparian habitats, other sensitive natural communities.</p>	<p>Less than Significant with Mitigation. The General Plan Update EIR concluded that buildout of the General Plan will impact various habitat types, including riparian habitat and other sensitive plant communities. Mitigation Measures BIO-1 and BIO-3 would reduce impacts to sensitive habitat to a less than significant level.</p>	<p>Less than Significant. New AHPO projects proposed within an SEA would be subject to all existing regulations. However, SEAs are frequently located within VHFHSZs, where the replacement requirement of the AHPO does not apply. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Any projects that may occur in SEAs would be subject to Mitigation Measure BIO-1 and</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
		<p>BIO-3 would remain in effect to reduce potential impacts to a less than significant level. The AHPO would not result in substantial housing construction in sensitive natural communities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Effect on protected wetlands.</p>	<p>Less than Significant with Mitigation. The General Plan Update EIR concluded that buildout of the General Plan may impact wetland areas and these impacts may have a significant adverse effect on wetlands through hydromodification, filling, diversion or change in water quality. Mitigation Measure BIO-1 would in combination with the requirements for regulatory permitting (e.g., Section 404 permitting and any associated mitigation requirements), impacts to wetlands would be considered less than significant.</p>	<p>Less than Significant. The AHPO would not increase the overall growth and development beyond what is anticipated in the General Plan Update EIR, nor would the ordinance change the location of planned development. Unincorporated Los Angeles County contains areas with coastal wetlands, drainages, marshes and vernal pools. No new or greater impacts would occur.</p>
<p>Potential to interfere with movement of wildlife species.</p>	<p>Significant and Unavoidable. The General Plan Update EIR indicated that buildout could impact regional wildlife linkages and nursery sites, constituting a potentially significant adverse effect on wildlife movement and nursery sites. Mitigation Measure BIO-1 and the SEA Ordinance provide some protection to avoid or minimize impacts to wildlife corridors and nursery sites; however, for those projects where avoidance or minimization of impacts is infeasible, the policies proposed in the General Plan do not provide for mitigation for loss of wildlife movement opportunities or nursery sites. If development impacts regional wildlife linkages and impedes wildlife movement, connectivity will be lost on a regional scale in these vital landscape corridors and linkages. Thus, impacts to wildlife movement are significant and unavoidable.</p>	<p>Less than Significant. While limited amounts of affordable housing could occur in proximity to sensitive areas, any replacement units are generally anticipated to occur in the footprint of existing development because of the small number of units involved and restrictions on location of off-site units (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Any projects developed within an SEA would be subject to existing regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Potential to conflict with any local policies protecting biological resources, such as a tree preservation ordinance.</p>	<p>Less than Significant. The General Plan Update EIR indicates that development will impact oak trees and oak woodlands. The County Oak Tree Ordinance and Oak Woodlands Conservation Management Plan (OWCMP) are applied on a project-specific level and consistency with these plans is determined on a project-by-project basis. The General Plan Update EIR found that the policies of the General Plan support the conservation of oak trees and oak woodlands and do not conflict with the County Oak Tree Ordinance or OWCMP.</p>	<p>Less than Significant. The removal of oak trees requires appropriate permits and approvals through the Los Angeles County Department of Regional Planning, such as Oak Tree Permits. The AHPO would not make any changes to the County Oak Tree Ordinance or OWCMP. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Potential to conflict with the provisions of an adopted habitat conservation plan.	<p>Less than Significant. The General Plan Update EIR found that the policies of the General Plan Update would not conflict with these goals and policies of these plans and LCPs and that impacts would be less than significant.</p>	<p>Less than Significant. The AHPO would not make any changes to the coastal land use plans and local coastal programs. There would continue to be no conflict with respect to compliance with any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Cultural Resources		
Significant historical resources.	<p>Significant and Unavoidable. Large number of historical resources could be disturbed. The General Plan Update EIR concluded that compliance with the goals, policies, and implementation measures of the General Plan would reduce impacts to historical resources. However, the policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the General Plan. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur in the future. Mitigation Measures CUL-1, CUL-2, and CUL-3 would reduce impacts to historic resources, but impacts are considered significant and unavoidable.</p>	<p>Less than Significant with Mitigation. The policies within the General Plan Update would continue to minimize the probability of historic structures being demolished and Mitigation Measures CUL-1, CUL-2, and CUL-3 would reduce impacts to historic resources. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Archaeological Resources.	<p>Less than Significant with Mitigation. The General Plan Update EIR concluded that development could impact known and unknown archaeological sites. However, existing federal, state, and local regulations address the provision of studies to identify archaeological resources. Mitigation Measures CUL-4 and CUL-5, which apply in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, would reduce impacts to a less than significant level.</p>	<p>Less than Significant with Mitigation. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. If unexpected archaeological or paleontological resources are discovered during excavation activities such resources must be evaluated in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code §21083.2. Health and Safety Code</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
		§7050.5, Public Resource Code §5097.98, and Guidelines § 5064.5(e) address how unexpected finds of human remains are to be handled. In addition, mitigation measures identified in the General Plan Update EIR would apply to development under the AHPO. No new or greater impacts would occur than identified in the General Plan Update EIR.
Unique Paleontological Resources.	<p>Less than Significant with Mitigation. The General Plan Update EIR indicates ground disturbance could damage fossils buried in soils. Abundant fossils occur in several rock formations in the County. These formations have produced numerous important fossil specimens. Therefore, the County contains significant, nonrenewable, paleontological resources and are considered to have high sensitivity. Implementation of Mitigation Measures CUL-4 and CUL-5 would reduce impacts to a less than significant level.</p>	<p>Less than Significant with Mitigation. In cases where undeveloped parcels could contain paleontological resources, or parcels that are adjacent to paleontological resources, may have to undergo mitigation per consultation with a designated paleontologist or archeologist, consistent with Mitigation Measure CUL-4 (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. In the event that paleontological resources are encountered during excavation, the project would be required to halt all development activities and retain the services of a qualified paleontologist, who can advise when construction activities can recommence, per the PRC §5097.5. Compliance with these guidelines would ensure no new or greater impacts would occur than identified in the General Plan Update EIR.</p>
Human remains.	<p>Less than Significant. The General Plan Update EIR determined that excavation during construction activities has the potential to disturb human burial grounds, including Native American burials, in underdeveloped areas of Los Angeles County. However, there are Public Resources Code Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also have provisions protecting human burial remains from disturbance, vandalism, or destruction. Therefore, compliance with these regulations would ensure impacts to human burial grounds are less than significant.</p>	<p>Less than significant. Projects subject to the AHPO would be required to comply with PRC § 5097.98 as well as the Health and Safety Code (§§ 7050.5, 7051, and 7054). While there is some potential to disturb human remains at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Tribal Cultural Resources	<p>Less than Significant with Mitigation. The General Plan Update EIR concluded that development of projects pursuant to the General Plan Update could impact known and unknown archaeological sites. The General Plan Update EIR noted that at the time there were 85 Native American sacred sites under CEQA in association with archaeological resources or, in the case</p>	<p>Less than Significant with Mitigation. The AHPO applies to replacement of existing affordable housing on sites that are proposed for redevelopment. Such sites are already disturbed and the likelihood of impacts related to resources would be low. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas (off-site replacement of</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	of burial locations, human remains. The Project Area is considered potentially sensitive for archaeological resources. However, Mitigation Measure CUL-4, which applies in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, would reduce impacts to a less than significant level.	affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Mitigation Measure CUL-4 would continue to apply and impacts would be reduced to a less than significant level. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Geology and Soils		
Earthquake faults, ground shaking, ground-failure, liquefaction, landslides.	Less than Significant. Compliance with existing state and county regulations, as well as the goals and policies included as part of the General Plan would ensure that impacts associated with exposure to strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides are reduced to a less than significant level.	Less than Significant. The AHPO would not increase development beyond what is anticipated under the General Plan Update, as it requires one to one replacement of affordable housing. Mobilehome parks are subject to the State’s seismic safety regulations outlined in Title 25 of the California Code of Regulations. Residential projects subject to the AHPO would have to comply with the Alquist-Priolo Earthquake Fault Zoning Act, regardless of whether replacement units are provided on- or off-site. Development under the AHPO would not exacerbate existing earthquake faults and associated risks conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Soil erosion and loss of topsoil	Less than Significant. Construction and site grading of future development projects pursuant to the General Plan could cause substantial soil erosion without effective soil-erosion measures. Adherence to the requirements of the County Code and the CBC, together with the safeguards afforded by the County’s building plan check and development review process, would help ensure that appropriate erosion controls are devised and implemented during construction. Furthermore, construction activities on project sites larger than one acre would be subject to National Pollution Discharge Elimination System (NPDES) requirements. Required erosion control measures may include temporary and/or permanent erosion control measures such as desilting basins, check dams, riprap or other devices or methods, as approved by the County. Consequently, impacts would be less than significant.	Less than Significant. AHPO projects would be required to comply with CBC regulations and the County’s development review process, which would ensure appropriate erosion controls are devised and implemented during project construction. Applicable AHPO projects would also have to comply with NPDES requirements as appropriate. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Unstable geologic unit or expansive soil	Less than Significant. Buildout of the General Plan would increase numbers of residents, workers, and structures in Los Angeles County. The County is geographically expansive,	Less than Significant. Development under the AHPO has the potential to expose structures or persons to hazards due to unstable geologic units or soils. However, compliance with existing state and county

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	embracing a variety of geologic settings and soil types. Areas of unstable geologic units or unstable or expansive soils are known to occur locally. Development considered for approval under the General Plan could expose structures or persons to potentially significant hazards due to unstable geologic units or soils. Compliance with existing state and county regulations, as well as the goals and policies included as part of the General Plan would ensure that the impacts associated with erosion and topsoil loss, as well as development atop unstable geologic units and soil, or expansive soil are minimized to the maximum extent practicable. Consequently, the overall, associated impacts would be less than significant.	regulations, as well as relevant General Plan goals and policies, would ensure that no new or greater impacts would occur. Development under the AHPO would not exacerbate existing soil conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Septic tanks or alternative waste water disposal systems	Less than significant. The General Plan Update EIR concluded that soil conditions would adequately support proposed septic tanks. Most new development that is anticipated in the County would not require the use of septic tanks or alternative wastewater disposal systems. In those few cases where septic systems might be necessary, such as rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, the prevailing soil conditions in Los Angeles County are generally amenable to the use to such systems. In addition, all on-site wastewater treatment systems (OWTS) will be required to comply with County Code, Titles 11 and 28 and other regulations applicable to OWTS, including requirements for preparation and submittal of feasibility reports in order to obtain the Department of Public Health - Environmental Health approval for construction and installation of OWTS. As such, there would be no impact from implementation of the General Plan at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. Impacts would be less than significant.	Less than Significant. The AHPO does not increase development beyond what is already anticipated under buildout of the General Plan. It is more likely that septic systems would be necessary in rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, where soil conditions are able to accommodate such systems. Projects subject to the AHPO will still be required to comply with regulations applicable to OWTS. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Greenhouse Gas Emissions		
GHG emissions	Significant and Unavoidable. The General Plan Update EIR concluded that buildout of the General Plan would generate greenhouse gas (GHG) emissions that would have a significant impact on the environment. The General Plan would contribute to global climate change through direct and indirect emissions of GHG from land uses within the unincorporated areas. Impacts from GHG emissions within the	Less than Significant Since the release of the General Plan Update, the state has passed Senate Bill 32 (SB 32), which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. However, similar to the General Plan Update, even with the implementation of Mitigation Measure GHG-1 and CCAP measures,

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	<p>unincorporated areas would be significant for long-term growth anticipated under the General Plan. Mitigation Measure GHG-1 as well as the Community Climate Action Plan (CCAP) would reduce impacts from buildout of the General Plan. However, additional statewide measures would be necessary to reduce GHG emissions under the General Plan to meet the long-term GHG reduction goals. Since no additional statewide measures are available, impacts are significant and unavoidable.</p>	<p>additional statewide measures are necessary to meet the long-term GHG reduction goals. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Conflict with applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.</p>	<p>Significant and Unavoidable. To achieve the local goals identified in CARB’s 2008 Scoping Plan, the General Plan included the CCAP which identifies and evaluates feasible and effective policies to reduce GHG emissions. Implementation of the CCAP would be necessary to ensure that the local GHG reduction goals for the County under AB 32 would be met. Adoption and implementation of the CCAP in its entirety would reduce GHG emissions to less than significant levels. However, in the absence of an adopted CCAP, consistency with plans adopted for the purpose of reducing GHG emissions toward the short-term target of AB 32 could be significant. Impacts would be significant and unavoidable.</p>	<p>Less than Significant. Since the adoption of the General Plan in 2015, the state has passed SB 32, which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. The General Plan determined that the CCAP was necessary to meet local goals within the 2008 CARB Scoping Plan to meet AB 32. The AHPO is consistent with the CCAP in promoting housing near transit through the implementation of density bonus. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Hazards and Hazardous Materials</p>		
<p>Routine transport, use, or disposal of hazardous materials; Accidental or reasonably foreseeable release of hazardous materials into the environment; Emit hazardous materials in proximity to schools.</p>	<p>Less than Significant. Numerous federal, state and local regulations exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. Implementation of the General Plan would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses would be required to comply with applicable federal, state and local regulations related to hazardous materials. Required compliance with these regulations would ensure impacts related to transport, use and disposal of hazardous materials would be less than significant.</p>	<p>Less than Significant. Handling of hazardous materials in the course of construction would be regulated by existing Health & Safety Code and Fire Code requirements. In some cases, a project level environmental assessment would determine the potential for impacts as well as any required mitigation. Further, affordable housing units demolished and constructed under the AHPO do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the AHPO would not involve the substantial transport, use, and disposal of hazardous materials. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Project that is on a list of hazardous materials site.</p>	<p>Less than Significant. Compliance with applicable existing regulations and processes would ensure that the General Plan would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites.</p>	<p>Less than Significant. Federal and state regulations as well as policies within the Land Use Element of the General Plan would reduce the potential for the public and the environmental to be exposed to hazardous materials from existing site conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
		Update EIR; no new or greater impacts would occur.
Hazards from airports and airstrips.	<p>Less than Significant. Implementation of the General Plan may result in land use designations that allow development within two miles of a public airport, private airstrip, or heliport. However, existing FAA regulations, County policies and regulations, and General Plan goals and policies are intended to identify and properly address potential airport hazards prior to implementation of specific projects within the County.</p>	<p>Less than Significant. AHPO projects could be constructed within two miles of a public airport, private airstrip, or heliport. However, all projects would be subject to existing FAA regulations, County policies and regulations, and General Plan Update goals and policies intended to address potential airport hazards to specific projects. The AHPO would not increase the number of units that are allowed to be built. As such, the AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Impair implementation of emergency response plan.	<p>Less than Significant. Compliance with applicable regulations and implementation of the General Plan goals and policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan is less than significant.</p>	<p>Less than Significant. Disaster routes mapped in the General Plan Safety Element are freeways and highways. Therefore, it is unlikely that a project would be approved that blocks access to the public right of way. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Wildfire risk.	<p>Less than Significant. The General Plan Update EIR concludes that policies and conditions of approval for future development projects within the County, in addition to compliance with applicable regulations, will minimize impacts related to wildland fires.</p>	<p>Less than Significant. Los Angeles County’s Very High Fire Hazard Severity Zones are mostly forest areas, such as the Angeles National Forest and Los Padres National Forest. These forest areas are zoned for watershed, open space, agriculture and a limited amount of low-density residential and rural commercial development. The replacement requirements of the AHPO do not apply within Very High Fire Hazard Severity Zones, a designation that applies to areas where residences are intermixed with wildlands. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Hydrology and Water Quality		
Violate water quality standards or waste discharge requirements.	<p>Less than Significant. The General Plan Update EIR concluded that implementation of the General Plan would comply with water quality standards and waste discharge requirements and would not substantially degrade water quality. Construction projects of one acre or more in area in each of the three Water Board regions (Los Angeles, Lahontan, and Central Valley) would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2012. Projects obtain coverage by developing and</p>	<p>Less than Significant. AHPO projects would be required to develop and implement a SWPPP and BMPs to minimize pollution of runoff. As such, impacts would remain less than significant upon compliance with regulatory requirements and General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. Impacts would be less than significant upon compliance with regulatory requirements and General Plan policies.	
Groundwater depletion, interfere with recharge.	Less than Significant. The General Plan Update EIR concluded that development pursuant to the General Plan would interfere with groundwater recharge. Developments in the unincorporated areas of Planning Areas would be mostly limited to redevelopments and reuses of currently developed areas. Thus, redevelopments in those Planning Areas would result in relatively minor increases in impervious areas.	Less than Significant. Any increase in impervious surface as a result of the off-site units constructed as a result of the AHPO would be within the increases analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Alter drainage patterns resulting in substantial erosion or siltation.	Less than Significant. The General Plan Update EIR concluded the General Plan would not substantially alter drainage patterns in Los Angeles County and would not result in substantial erosion or siltation. Under the MS4 Permit certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. These requirements would ensure that there would not be a substantial change in drainage patterns in the Los Angeles Water Board Region, Lahontan Water Board Region, and Central Valley Water Board Region. Impacts would be less than significant.	Less than Significant. AHPO projects would be required to mimic predevelopment hydrology, evapotranspiration, and rainfall harvest as required by the MS4 permit. As a result, the AHPO would not create a substantial change in drainage patterns to the Los Angeles Water Board Region, Lahontan Water Board Region, or the Central Valley Water Board Region. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Alter drainage patterns resulting in substantial increase in surface runoff.	Less than Significant. Developments pursuant to the General Plan would not substantially increase runoff rates or volumes and substantial consequent flood hazards would not occur. The General Plan EIR found impacts would be less than significant.	Less than Significant. AHPO projects would be constructed within the Los Angeles and Central Valley Water Board Regions. The MS4 permits in these areas will require the projects to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Any grading or paving would need to comply with LID and NPDES requirements to receive construction permits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Create or contribute runoff water in excess of stormwater drainage systems or otherwise substantially degrade water quality.	Less than Significant. The General Plan Update EIR found impacts related to stormwater drainage and polluted runoff to be less than significant as a result of required compliance with existing regulations (including	Less than Significant. The AHPO would not substantially increase units or developed area and would not be expected to substantially contribute to polluted runoff. The AHPO would not substantially change impacts as compared to those identified in the General Plan

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	requirements for Stormwater Pollution Prevention Plans – SWPPP, MS4 and other requirements applicable to the Los Angeles and Lahontan regions).	Update EIR; no new or greater impacts would occur
Housing in 100-year flood hazard area; Placing structures to 100-year flood hazard area that could impede flood flows.	Less than Significant. The General Plan Update EIR found that forecast housing development could occur within 100-year flood hazard areas. However, development within 100-year flood zones would require improvements to flood control facilities, and issuance of Letters of Map Revision by the Federal Emergency Management Agency (FEMA) showing changes to 100-year flood zones reflecting such improvements; or that the floor beams of the lowest floor of the structure are raised above the 100-year flood elevation. Flood insurance available through the National Flood Insurance Program (NFIP) would also be required. Therefore, buildout of the General Plan would not place substantial numbers of people or structures at risk of flooding in 100-year flood zones, and impacts would be less than significant.	Less than Significant. If a project subject to the AHPO is constructed within a flood zone, it would be required to improve flood control facilities and issue Letters of Map Revision by FEMA to demonstrate improvement; or construct floor beams raised above the 100-year flood elevations. Additionally, these projects would be required to comply with the County’s municipal code for building with flood-prone areas. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Flooding.	Less than Significant. The general Plan Update EIR indicates that dam inundation areas span some unincorporated areas of all the County except the South Bay Planning Area; and parts of the Antelope – Fremont Valleys, Santa Clara, San Gabriel River, Santa Monica Bay, Los Angeles River, and San Pedro Channel Islands watersheds. Considering the relatively small proportional net increases in numbers of residents and workers that would be put at potential risk from dam inundation; the operation of most of the dams as flood control dams, not impounding large reservoirs most of the time; and safety requirements and inspections by the Division of Safety of Dams, the General Plan EIR found that impacts would be less than significant.	Less than Significant. As noted in the General Plan Update EIR, there is a relatively small proportional net increase in numbers of residents and workers that would be put in potential risk. Moreover, most of the dams are flood control dams subject to the safety requirements and inspections by the Division of Safety of Dams. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Seiche, tsunami, mudflow.	Less than Significant. As analyzed in the General Plan Update EIR, parts of the County are subject to inundation by seiche, tsunami, or mudflow. Buildout of the General Plan would not subject substantially increased numbers of people or structures to tsunami flood hazards. Therefore, buildout of the General Plan would not subject substantially increased numbers of people or structures subject to tsunami flood hazards. Impacts would be less than significant.	Less than Significant. The presence of a potential landslide hazard will be determined at the project level. The only unincorporated area in a tsunami hazard zone is Marina del Rey, which is already built-out with high-density housing and is subject to the Marina del Rey Local Coastal Program, which contains analysis and policies governing assessment of tsunami and seiche risk. Further, Marina del Rey would not be subject to the AHPO as it has its own affordable housing replacement requirement and mobilehome parks are not a permitted use. The

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
		AHPO would not substantially change impacts as compared to those identified in the General Plan Update; EIR no new or greater impacts would occur.
Land Use and Planning		
Potential to physically divide a community.	<p>Less than Significant. The General Plan identifies proposed and planned roadways in Los Angeles County. At a programmatic level, the General Plan does not allow land uses patterns that would result in division of an established neighborhood or community. Although policy maps included in the Land Use and Mobility Elements of the General Plan identify locations for Transit Oriented Districts, highways, and transit projects, these changes and improvements are not anticipated to divide established neighborhoods. Impacts would be less than significant.</p>	<p>Less than Significant. The AHPO requires one-for-one replacement of any lost affordable housing units. Projects subject to the AHPO are anticipated to be generally consistent with the existing zoning and the allowable densities specified in the General Plan Land Use Element and DBO; any proposed zone change would require discretionary action. Any projects that are not consistent with zoning or the General Plan land use designation (and therefore with the potential to disrupt an existing neighborhood) would be subject to the County process for zone changes or General Plan amendments. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Conflict with any applicable land use plan, policy, or regulation.	<p>Less than Significant. The General Plan Update EIR concluded that the General Plan would not conflict with goals contained within SCAG’s 2012–2035 RTP/SCS or other land use plans. Therefore, impacts related to compatibility between the General Plan and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant.</p>	<p>Less than Significant. Projects developed under the AHPO would be subject to environmental review for consistency with local land use plans, goals, and policies, some of which may call for more affordable housing. The AHPO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by maintaining the existing supply of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Conflict with any applicable habitat conservation plan.	<p>Less than Significant. The General Plan Update EIR concluded that the General Plan would not conflict with adopted habitat conservation plans. Although buildout of the General Plan would include development and redevelopment in areas covered by conservations plans, such development would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.</p>	<p>Less than Significant. Any AHPO project developed in an area covered by conservation plans would be required to comply with provisions of those plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Mineral Resources		
Loss of availability of mineral resource of value to region or state.	<p>Significant and Unavoidable. The General Plan Update EIR concluded that implementation of the General Plan would cause the loss of availability of a known mineral resource in the Antelope Valley Planning Area but not in the other 10 Planning Areas. No mitigation measures are available that would reduce impacts of buildout from the General Plan are considered infeasible.</p>	<p>Less than Significant. While AHPO projects could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the AHPO are currently in use as mineral extraction. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Loss of availability of locally important mineral resource recovery site.	<p>Significant and Unavoidable. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate.</p>	<p>Less than Significant. The AHPO would not affect mineral resource zones or otherwise result in the loss of locally important mineral resources. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Noise and Vibration		
Generation of noise levels in excess of standards	<p>Significant and unavoidable. The General Plan Update EIR found that anticipated development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment. Implementation of policies within the General Plan would reduce traffic noise impacts to existing noise sensitive uses to the extent feasible. However, no additional feasible mitigation measures are available to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within Los Angeles County that would be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site traffic noise impacts to existing uses (such as through the construction of sound walls and/or berms) may often be out of proportion with the level of impact. Impacts were found to be significant and unavoidable.</p>	<p>Less than Significant. AHPO projects could generate some construction noise and could expose residents to sources of noise. However, construction activities are subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. The AHPO could lead to an incremental increase in the size of a project. However, this incremental increase would not generate significant amounts of noise compared to other types of uses. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Traffic associated with development under the AHPO would be within the assumptions made and analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Exposure of persons to or generation of excessive groundborne vibration or noise levels	<p>Significant and Unavoidable. The General Plan Update EIR found that due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts would be significant and unavoidable.</p>	<p>Less than Significant with Mitigation. The AHPO is not anticipated to result in significant generation of groundborne vibration or groundborne noise levels in excess of County standards. AHPO projects are primarily expected to be located in zones that allow housing. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not induce the development of industrial land uses typical of excessive groundborne vibration or groundborne noise levels. However, construction of AHPO projects could result in short-term ground-borne vibration or groundborne noise levels and would be required to implement Mitigation Measure N-4, consistent with the General Plan Update. The AHPO would not</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
		substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Permanent increase in ambient noise levels	Significant and Unavoidable. Buildout of the General Plan would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment.	Less than Significant with Mitigation. AHPO projects would generate traffic that could incrementally contribute to elevated noise levels from mobile sources along roadways. To the extent that projects exacerbate impacts such impacts would be considered significant. However, most projects would result in a less than significant contribution to traffic and therefore noise. Projects would be required to implement Mitigation Measure N-2 and are required to achieve interior noise limits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Temporary or periodic increase in ambient noise levels	Significant and Unavoidable. Construction activities associated with any individual development may occur near noise-sensitive receptors and, depending on the project type noise, disturbances may occur for prolonged periods of time. Mitigation Measure N-1 would reduce impacts associated with construction activities to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts construction noise would be significant and unavoidable.	Less than Significant with Mitigation. AHPO projects could generate elevated noise levels from construction activities in some locations. However, the projects would be subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not induce the development of industrial land uses, which tend to generate the most significant noise impacts. Additionally, the projects would be required to implement the General Plan’s Mitigation Measure N-1 , which would reduce impacts associated with construction activities to the extent feasible. Existing noise levels on sites where projects are most likely to occur is anticipated to be generally urban and in proximity to transit. Noise impacts would be temporary and typical for construction activity, which is allowable in urban areas and therefore reasonably anticipated to occur. In addition, all stationary equipment (primarily anticipated to be HVAC equipment) would be required to comply with county regulations to ensure noise levels do not exceed ambient noise level standards. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Proximity to public or private airport	Less than Significant. The General Plan Update EIR explains that development required to be consistent with any applicable Airport Land Use Compatibility Plan (ALUCP) constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that	Less than Significant. The AHPO would be required to comply with policies included in the Land Use Element and Noise Element of the General Plan to ensure that development would not conflict with airport land use plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	development would not conflict with airport land use plans. Therefore, future development under the General Plan would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels (and would not exacerbate existing impacts).	
Population and Housing		
Induce population growth.	Less than Significant with Mitigation. Under the General Plan, the Antelope Valley Planning Area would result in a large increase in housing. This would be considered a significant impact without mitigation. Mitigation Measure PH-1 would reduce potential impacts to population and housing to a level that is less than significant.	Less than Significant. The AHPO requires replacement of lost affordable housing units. The AHPO is not anticipated to result in a substantial increase in population as it aims to maintain the existing affordable housing stock in the County. The effects of the AHPO on population growth would be minimal and well within the assumptions of the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Displace housing or people.	Less than Significant. The General Plan Update EIR concluded that existing uses would continue even where new zoning and land use designations are proposed. None of the existing uses would be forced to be removed or relocated as a result of the project implementation. Compliance with the Housing Element would facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate the RHNA and maintain an inventory of housing opportunities sites. Therefore, the General Plan Update EIR found no significant impacts.	Less than Significant. The AHPO requires replacement of lost affordable housing units. The purpose of the AHPO is to preserve the existing affordable housing stock in Los Angeles County. As described in the Project Description, the AHPO would work with other housing related ordinances adopted or under consideration (Inclusionary Housing, , Density Bonus, Interim and Supportive Housing) to ensure that new residential projects set aside a percentage of units for affordable housing. The AHPO would not result in displacement of existing housing as it does not incentivize development. Rather, it seeks to alleviate the loss of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Public Services		
Impact to environment based on new government facilities such as fire/emergency stations, police stations, and schools	Less than Significant with Mitigation. To maintain or achieve acceptable service ratios for fire and law enforcement, Mitigation Measures PS-1, PS-2, PS-3, PS-4 would reduce impacts to a less than significant level.	Less than Significant with Mitigation. Projects subject to the AHPO are not expected to increase population beyond what is already anticipated under the General Plan. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by public services. Implementation of Mitigation Measures PS-1, PS-2, PS-3, and PS-4 would reduce impacts to a less than significant level. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Recreation		
Substantial physical deterioration of recreational facilities.	<p>Less than Significant.</p> <p>The General Plan Update EIR indicates that forecast development would generate additional residents that would increase the use of existing parks and recreational facilities such that substantial physical deterioration may occur or be accelerated. According to the General Plan Parks and Recreation Element, the unincorporated areas face a deficit in local parkland of over 3,719 acres, and nine of the 11 Planning Areas have deficits in regional parkland. The Department of Parks and Recreation’s Parks Needs Assessment, completed in 2016, inventories existing park resources, quantifies the need for additional resources in 188 Los Angeles County sub-areas (cities and unincorporated areas), and estimates the potential cost of meeting that need. Funding from a parcel tax approved in 2016 will be allocated locally according to need by the Regional Parks and Open Space District. Further, the General Plan Update EIR found that policies and programs would assure that funding for parkland acquisition would be proportional to increases in population pursuant to the Quimby Act and that impacts would be less than significant.</p>	<p>Less than Significant.</p> <p>The AHPO would not induce population growth within the County; rather it would serve the forecast population by maintaining the number of units in the housing stock that are affordable. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by parks and recreation facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Require construction of recreational facilities that might have an adverse effect on the environment.	<p>Less than Significant.</p> <p>Goals, policies, and actions in the General Plan including the creation of a County Parks and Recreation Master Plan, a trails program, and Parks Sustainability Program would guide the development of future recreational facilities. Existing federal, state, and local regulations, would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails pursuant to buildout of the General Plan. Furthermore, subsequent environmental review would be required for development of park projects under existing regulations. Consequently, the General Plan Update EIR determined impacts would be less than significant.</p>	<p>Less than Significant.</p> <p>The AHPO would not induce population growth and would add to the affordable housing stock for the County. Projects subject to the AHPO would comply with existing federal, state, and local regulations regarding parks and recreational facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Transportation and Traffic		
Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; Conflict with an applicable congestion management	<p>Significant and Unavoidable.</p> <p>The General Plan Update EIR concludes that buildout of the General Plan would impact levels of service on the existing roadway system. Mitigation Measures T-1 through T-5 would reduce these impacts, however, the impacted locations are still considered to be significant. Furthermore,</p>	<p>Significant and Unavoidable.</p> <p>The AHPO requires replacement of lost affordable housing units and would preserve existing density in legally established mobilehome parks. The AHPO would not substantially change the location that development would occur; replacement units would be allowed to be constructed off-site only as part of an inclusionary housing requirement and</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
program.	inasmuch as the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County’s control (e.g., the County cannot undertake or require improvements outside of the County’s jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans’ approval). Therefore, the General Plan Update EIR determined impacts would be significant and unavoidable.	are subject to locational requirements in the Inclusionary Housing Ordinance that are anticipated to result in such development being primarily located in urban areas in proximity to transit. The AHPO would not increase development beyond that evaluated in the General Plan Update EIR. In general, AHPO projects (other than mobilehome parks) are expected to be located in urbanized infill areas. Such areas are often but not exclusively in proximity to transit and/or walkable destinations. With respect to mobilehome parks, the proposed preservation of existing legally established parks that exceed current allowable density, would not increase VMT compared to existing conditions. The AHPO would not substantially change traffic impacts (including VMT impacts) as compared to those that would occur under the General Plan Update; no new or greater impacts would occur.
Air Traffic.	Less than Significant. The General Plan is not anticipated to result in the development of a new airport within Los Angeles County nor will it introduce new land uses that could prevent safety hazards to air traffic. Furthermore, policies of the General Plan are aimed at improving the compatibility between aviation facilities and their surroundings, encouraging greater multi-modal access to airports and encouraging the development of a decentralized system of major airports. The General Plan EIR found impacts to be less than significant.	Less than Significant. While the AHPO does not prohibit projects in the vicinity of an airport or flight path, these projects would be limited in number and therefore unlikely to significantly affect flight paths or air travel. All projects in an Airport Influence Area must be reviewed for a consistency determination with the applicable ALUCP. Existing FAA regulations and the ALUCPs and are intended to identify and properly address potential airport hazards prior to implementation of specific projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Design feature.	Less than Significant. The General Plan Update EIR found that there would not be substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The General Plan promotes highways to be built to specific standards that have been set by the County. These include increasing the number of lanes on major highways and other improvements under the Highway Plan. Hazards due to roadway design features will be evaluated on a project-by-project basis. All new highways and upgrades will be planned, designed and built to County standards. The General Plan Update EIR found impacts to be less than significant.	No Impact. Development associated with the AHPO is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The AHPO would not result in changes being made to the local roadways or impede public access on any public right-of-way. Therefore, implementation of the AHPO would have no impact related to design feature hazards. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.
Emergency access.	Less than Significant. The General Plan Update EIR found that development would not result in inadequate emergency access. For projects of sufficient size, discretionary review of	Less than Significant. Any lane closures must be approved by the County and they would not be approved if substantial delays could result. Typically, the County requires a construction traffic management plan, including

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	<p>emergency access is evaluated on a project-by-project basis. The General Plan Update EIR found that buildout will enhance the capacity of the roadway system by upgrading roadways and intersections when necessary, ensure that the future dedication and acquisitions of roadways are based on projected demand, and implement the construction of paved crossover points through medians for emergency vehicles. Additionally, the General Plan Update EIR found that the General Plan will facilitate the consideration of the needs for emergency access in transportation planning. The County will maintain a current evacuation plan, ensure that new development is provided with adequate emergency and/or secondary access, including two points of ingress and egress for most subdivisions, require visible street name signage, and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. The General Plan Update EIR determined impacts to be less than significant.</p>	<p>use of flag personnel to help direct traffic around any roadway closures. Compliance with access standards, including the Haul Route Monitoring Program would reduce potential impacts on roadways designated as haul routes and emergency response services during construction of individual projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</p>	<p>Less than Significant. The General Plan Update EIR found that the General Plan would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). The General Plan supports alternative modes of transportation, including walking and bicycling, to reduce total VMT. Additionally, the General Plan establishes several policies to ensure the safety and mobility of pedestrians and bicyclists. The County will provide safe and convenient access to safe transit, bikeways, and walkways, consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems, provide safe pedestrian connections across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations, adopt consistent standards for implementation of Americans with Disabilities Act requirements and in the development review process prioritize direct pedestrian access between building entrances, sidewalks and transit stops. The General Plan EIR determined impacts would be less than significant.</p>	<p>Less than Significant. Development associated with the AHPO would be consistent with the underlying zoning for the site. Projects would continue to be consistent with General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Utilities and Service Systems		
Wastewater treatment requirements.	<p>Less than Significant. According to the General Plan Update EIR, wastewater generation under the General Plan would not exceed wastewater treatment requirements of any of the four Regional Water Quality Control Boards having jurisdiction in Los Angeles County. General Plan implementation Programs require Department of Regional Planning and the Department of Public Works (DPW) to jointly secure sources of funding and to set priorities for preparing studies to assess infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, the County will prepare a Capital Improvement Plan for each of the 11 Planning Areas. Each Capital Improvement Plan shall include a Waste Management Study and Stormwater System Study. General Plan policies also require the County to support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan encourages development, such as Transit Oriented Districts (TODs). Therefore, the General Plan Update EIR found that polices and required regulations would ensure impacts are less than significant.</p>	<p>Less than Significant. Development associated with the AHPO would be well within the expected growth for the unincorporated County evaluated in the General Plan Update EIR and would not exceed RWQCB standards for treatment of wastewater or wastewater treatment capacity. Additionally, water conservation practices and compliance with best management practices (i.e., low flow toilets and automatic sinks), as well as Title 24 requirements, are likely to reduce wastewater generation. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
New water or wastewater treatment facilities; stormwater facilities. Determination of capacity.	<p>Less than Significant. The General Plan Update EIR explains that projects are required to pay connection fees to the LACSD, or corresponding types of fees to the City of Los Angeles Bureau of Sanitation, as applicable. Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Antelope Valley and Santa Clarita Valley Planning Areas. The General Plan Update EIR determined there is sufficient wastewater treatment capacity in the remaining Planning Areas and impacts would be less than significant.</p>	<p>Less than Significant. Development associated with the AHPO would not result in a substantial change in the number of housing units; it would simply replace affordable units that are removed from the housing stock. Such development would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing sewer lines and stormwater drainage systems. Development in accordance with the AHPO would be required to comply with all applicable County regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Water supply.	<p>Significant and Unavoidable. The General Plan Update EIR concludes that adequate water supplies have been identified in the UWMP's for the County for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the General Plan, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. It is uncertain whether the</p>	<p>Less than Significant. Water would be conveyed to projects along existing circulating water mains of varying sizes. Projects associated with the AHPO are anticipated to be generally located on land already developed with residential uses and served by water systems. Projects would be subject to Los Angeles County's Low Impact Development (LID) requirements, Los Angeles County's drought-tolerant landscaping requirements, and CALGreen construction requirements for low flow fixtures and other water</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035. Mitigation Measures USS-1 through USS-23 would lower these impacts, however the General Plan Update EIR finds that impacts would be significant and unavoidable.	conservation features. Development in accordance with the AHPO would be required to comply with water conservation requirements and ensure that adequate infrastructure exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update; EIR no new or greater impacts would occur.
Impacts to landfills; Comply with applicable regulations regarding solid waste.	Less than Significant. The General Plan Update EIR finds that generation of solid waste would increase as the population increases with buildout of the General Plan. Correspondingly, there would be a need for additional landfill capacity and related support facilities. Both the forecasted net increase in solid waste generation by General Plan buildout and the forecast total solid waste generation in unincorporated County areas at General Plan buildout are well within the total residual per day daily disposal capacity of the nine landfills analyzed in the General Plan Update EIR. The General Plan Update EIR concludes that buildout would not require construction of new or expanded landfills, and impacts are found to be less than significant.	Less than Significant. The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. It is unlikely to result in projects that would significantly impact landfill capacity. As discussed elsewhere in this Addendum, AHPO projects are primarily anticipated to be located in urban areas already served by existing landfills. Projects that obtain planning and building approvals would be consistent with solid waste regulations and would not be expected to generate substantial amounts of solid waste. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

As shown in the table above, development associated with the AHPO would be consistent with growth assumptions in the General Plan Update EIR. As a result, and as demonstrated in this Addendum, all impacts would be less than or equal to those analyzed in the General Plan Update.

Therefore, as summarized in Table 1-2 and analyzed in more detail in **Chapter 3.0**, the AHPO would not result in 1) substantial changes that require major revisions to the General Plan Update EIR; 2) substantial changes to circumstances, related to significant effects, that require major revisions to the General Plan Update EIR; 3) new information of substantial importance which was not known and could not have been known at the time to General Plan Update EIR was certified. Therefore, the AHPO would not trigger any of the conditions that require the preparation of a subsequent or supplemental EIR under Guidelines sections 15162 and 15163, and therefore an Addendum to the General Plan Update EIR is the appropriate CEQA document to address the AHPO.

1.11 INCORPORATION BY REFERENCE

The following documents were used in the preparation of this Addendum, and are incorporated herein by reference, consistent with Guidelines section 15150:

- Los Angeles County General Plan Update Final Program Environmental Impact Report, certified October 7, 2015.
- An ordinance amending Title 8 – Consumer Protection, Business and Wage Regulations, Title 21 – Subdivisions, and Title 22 – Planning and Zoning of the Los Angeles County Code to establish an Affordable Housing Preservation Ordinance in the unincorporated areas of Los Angeles County.

The Affordable Housing Preservation Ordinance is available on the County’s website at: <http://planning.lacounty.gov/ahpo>.

The General Plan Update General Plan Update EIR is available for review at the County of Los Angeles, Department of Regional Planning, 320 W. Temple Street, Room 1356, Los Angeles, CA 90012 and on-line:

- Draft PEIR: http://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf
- Final PEIR: http://planning.lacounty.gov/assets/upl/project/gp_2035_lac-gpu-final-eir-final.pdf

2.0 PROJECT DESCRIPTION

2.1 LOS ANGELES COUNTY GENERAL PLAN UPDATE PEIR

As noted in **Chapter 1.0, Introduction**, the Los Angeles General Plan Update is the project analyzed in the Los Angeles County General Plan Update EIR (General Plan Update EIR).¹

Encompassing approximately 4,083 square miles, Los Angeles County is geographically one of the largest counties in the country. It stretches along 75 miles of the Pacific Coast of Southern California and is bordered by Orange County to the southeast, San Bernardino County to the east, Kern County to the north, and Ventura County to the west. It also includes two offshore islands, Santa Catalina Island and San Clemente Island. The regional location of Los Angeles County is shown in **Figure 2-1, Regional Vicinity**.

The area for the proposed project includes only the unincorporated areas of Los Angeles County (unincorporated areas), approximately 65 percent of the total land area in Los Angeles County fall within the unincorporated areas. The unincorporated areas in the northern portion of Los Angeles County are covered by large amounts of sparsely populated land and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of Los Angeles County consist of noncontiguous land areas, which are often referred to as Los Angeles County's "unincorporated urban islands." These unincorporated areas are shown in **Figure 2-2, Unincorporated Areas of Los Angeles County**.

Zoning is the key tool used to implement land use policies related to the use of land, buildings, location and form of structures. Zoning regulations are generally intended to guide the development of the unincorporated areas in an orderly manner, based on the adopted general plan, to protect and enhance the quality of the natural and built environment, and to promote the public health, safety, and general welfare.

The General Plan Update was a comprehensive update to the County's General Plan. The purpose of the General Plan is to guide growth and development within the unincorporated areas. As part of the 2015 Update, several elements to the General Plan were revised, combined, and otherwise reorganized. The General Plan Update also included minor amendments to the County Code related to Significant Ecological SEA Ordinance, Hillside Management Area HMA Ordinance, amendments to the MXD zone, and amendments to a number of other zones, as well as adoption of the Community Climate Action Plan (CCAP).

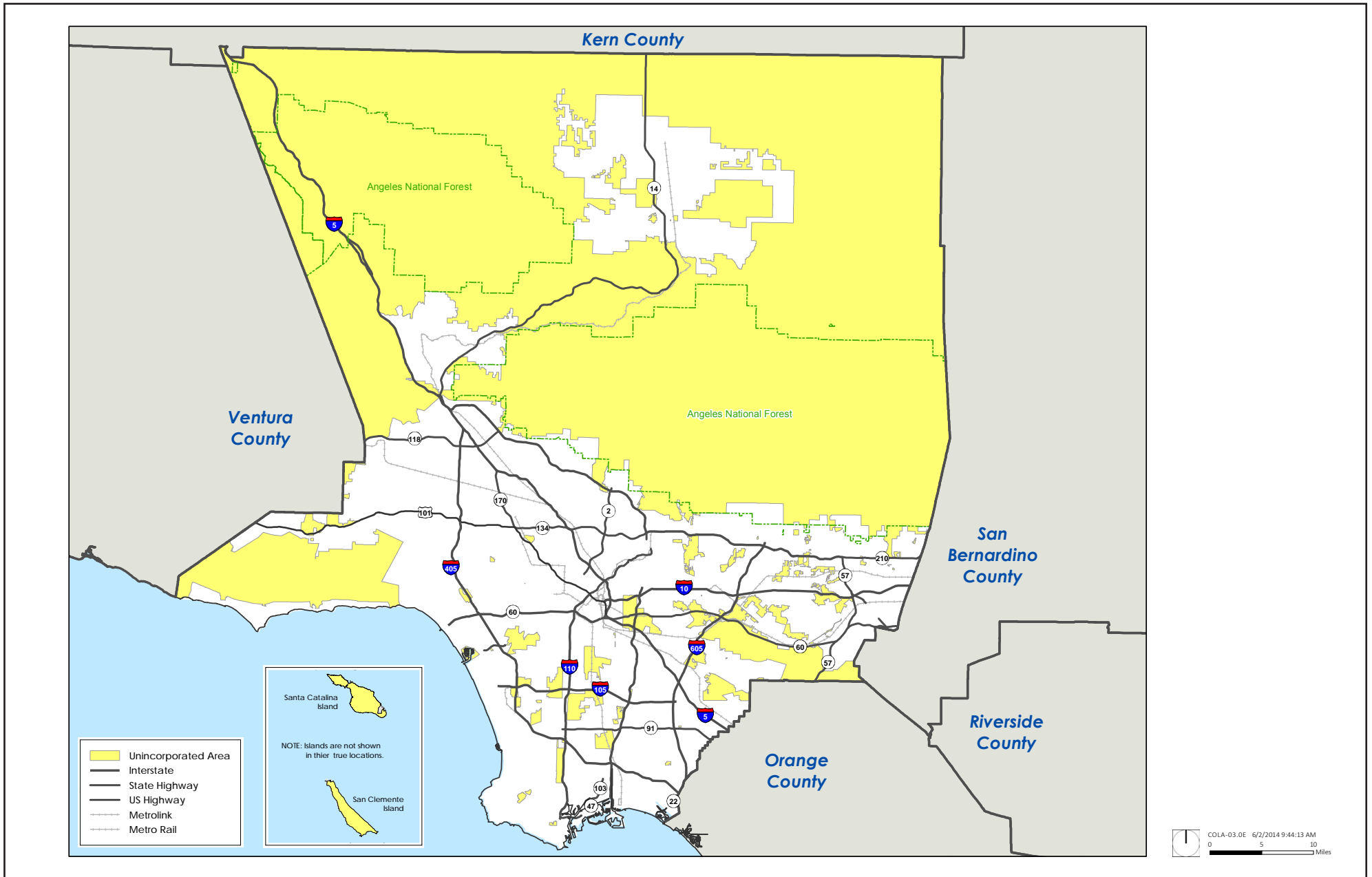
¹ Los Angeles County, General Plan 2035 Programmatic EIR, Certified October 6, 2015 available at: <http://planning.lacounty.gov/generalplan/eir>



SOURCE: Placeworks, 2014; ESRI, 2014

FIGURE 2-1

Regional Vicinity



SOURCE: Placeworks, DRP, 2013

FIGURE 2-2

Unincorporated Areas of Los Angeles County

One major policy was to encourage more preservation of existing affordable housing stock. The Housing Element of the General Plan includes a program to preserve 582 “at-risk” units for low income households between 2014 to 2024. Units are considered “at risk” if they have the potential to convert to market-rate housing. Preventing the conversion of affordable housing to market-rate units will help maintain the rental housing stock for extremely low-income to moderate-income households.

The purpose of the Affordable Housing Preservation Ordinance (AHPO) is to preserve the supply of affordable housing and require affordability of replacement dwelling units.

The General Plan Update EIR identifies and analyzes projections for population, households, and employment (post 2035). As shown in **Table 2-1** below, buildout of the General Plan would result in 358,930 additional residential dwelling units compared to existing land uses. Most of the new development is expected to occur in the Antelope Valley Planning Area, which will accommodate about 70.6 percent of new residential units and 76 percent of the population growth.

Table 2-1
General Plan Residential Buildout Projections (by Planning Area)

Planning Area	Existing (2013)		Proposed Project Buildout (Post 2035)	
	Units	Population	Units	Population
Antelope Valley Planning Area	24,739	93,490	278,158	1,070,571
Coastal Islands Planning Area	44	158	21	0
East San Gabriel Valley Planning Area	63,835	239,218	70,097	255,952
Gateway Planning Area	28,743	104,061	34,446	120,358
Metro Planning Area	73,068	235,990	92,158	301,073
San Fernando Valley Planning Area	9,039	32,488	13,464	47,060
Santa Clarita Valley Planning Area	28,501	104,116	77,155	237,638
Santa Monica Mountains Planning Area	5,703	21,757	6,788	26,128
South Bay Planning Area	19,952	69,474	25,929	86,392
West San Gabriel Valley Planning Area	34,765	125,736	43,877	156,685
Westside Planning Area	12,099	39,926	17,316	55,033
Total	300,478	1,066,414	659,409	2,356,890
Increase Over Existing			358,931	1,290,476

Source: General Plan 2035 EIR, Table 3-7

2.2 BACKGROUND

As identified in the Los Angeles County Affordable Housing Action Plan, the County is confronting a housing crisis.² A 2020 report by California Housing Partnership found that 509,404 low-income renter households in the county do not have access to an affordable home, and 79 percent of extremely low-income households are paying more than half their income on housing costs. Wages have not kept pace with the cost of housing—renters in Los Angeles County need to earn \$41.96 per hour, or 2.8 times the minimum wage, to afford the average monthly rent of a two-bedroom apartment.³

Housing need in Los Angeles County is expected to continue to rise with projected population growth. Projected County population growth translates into a Regional Housing Needs Assessment (RHNA) for the County’s unincorporated areas for the 2014-2021 Housing Element planning period of 27,440 units.⁴ **Table 2-2** shows the breakdown of the RHNA allocation by Area Median Income (AMI) income categories. As of the end of 2019, 21,283 units are needed by October 2021 in order to meet housing needs in the unincorporated areas of Los Angeles County. Given past annual performance, the County is well short of being on-track to meet this number.

Table 2-2
Los Angeles County Unincorporated Areas RHNA Progress/Building Permit Activity

Income Level	RHNA Allocation by Income Level	2014	2015	2016	2017	2018	2019	2020	2021	Total Units to Date	Total Remaining RHNA
		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8		
Extremely Low/ Very Low	7,404	159	32	35	354	38	54			672	6,732
Lower	4,281	0	0	0	108	14	107			229	4,052
Moderate	4,930	0	0	0	0	19	0			19	4,911
Above Moderate	10,825	513	1,790	620	622	563	1,130			5,237	5,588
Total RHNA	27,440	672	1,822	655	1,084	634	1,291			6,157	21,283

Source: County of Los Angeles Housing Permit Data, Housing Section, 2020

² Los Angeles County Department of Regional Planning (January 2018) Los Angeles County Affordable Housing Action Plan. http://planning.lacounty.gov/assets/upl/project/housing_la_ahap_action-plan.pdf

³ California Housing Partnership. Los Angeles County 2020 Affordable Housing Needs Report (May 2020). Available online at: https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2020/06/Los_Angeles_Housing_Needs_Report_2020-HNR.pdf, accessed June 16, 2020.

⁴ The County’s RHNA for the 2014-2021 planning period is 30,145 units, but it has been adjusted to account for annexations that have occurred to date.

Table 2-2 shows the County’s progress in meeting its RHNA through residential building permit activity. SCAG recently released draft RHNA numbers for the 2021-2029 housing element planning period, and the County has an even higher target of nearly 90,000 units. As shown in **Table 2-2**, the County is not producing enough affordable housing to adequately serve the need.

In response to the local and statewide housing crisis, the County is working to increase housing choice, affordability and livability in the unincorporated areas. One piece of the County’s overall plan is the proposed AHPO. The Los Angeles County Affordable Housing Action Plan recommended a multi-pronged approach to addressing the need to stabilize and preserve affordable housing. These strategies include: limiting the conversion of rental housing to market-rate condominiums, establishing a funding program for naturally occurring affordable housing (NOAH) units, and requiring a one-for-one replacement of any affordable units that are demolished or removed.

In June 2020, DRP staff developed a Public Hearing Draft AHPO, which contains the following policies:

- No net loss: requires one-to-one replacement of rental units occupied by extremely low, very low, lower or moderate income households within the previous five years that are demolished, vacated or converted from rental to for-sale. The replacement units must be deed-restricted to ensure affordability to extremely low, very low, lower or moderate income residents. Alternatives include on-site or off-site replacement, or payment of a replacement fee. Off-site replacement would only be allowed if replacement is provided as part of an inclusionary housing project that does not use a density bonus (few such projects are anticipated to occur).
- Condominium conversions: requires notification to organizations qualified to preserve affordable rental housing prior to submitting an application to convert rental housing to condominiums.
- Mobilehome park preservation: preserve mobilehome parks as a viable lower-cost housing option by clarifying and streamlining requirements to their establishment and continued operation. (Many mobilehome parks predate the current zoning code.).

Preservation of existing units typically costs one-half to two-thirds less than new construction while also allowing low-income tenants to remain in place.⁵

2.3 PROJECT CHARACTERISTICS

The AHPO seeks to preserve the supply of affordable housing and require affordability of replacement dwelling units. The AHPO incorporates requirements of State Density Bonus Law and the County’s

⁵ Los Angeles County Department of Regional Planning (January 2018) Los Angeles County Affordable Housing Action Plan. http://planning.lacounty.gov/assets/upl/project/housing_la_ahap_action-plan.pdf

Density Bonus Ordinance relative to replacement of units. The AHPO also incorporates the requirements of California Government Code Section 66300 which requires replacement of rent stabilized units that were withdrawn from the rental market within the last 10 years.⁶ In addition, AHPO requires replacement of units that are/were covenanted for, or occupied by, extremely low income households within the last 5 years; and units that are/were covenanted for moderate-income households within the last 5 years (if incomes in non-covenanted units are unknown, then the assumption is to be based on Census data regarding the income level of households in the jurisdiction).

The AHPO considers a variety of strategies, including the regulation of condominium conversions, one-for-one replacement or “no net loss” policies, on and off-site replacement options (with certain limitations) and replacement fees. The ordinance includes three primary components: replacement of affordable units, condominium conversions, and mobilehome parks.

The AHPO does not identify specific development projects or specific locations for development.

Applicability. The ordinance applies to new construction of any principal building (residential or non-); a change of principal residential use to another principal use; a change in the number of dwelling units; a land division; and legalization of an existing unpermitted dwelling unit.

Replacement Fee. Payment of a replacement fee would be allowed for projects that cannot provide rental units on site because they are: 1) non-residential projects; or 2) condo conversions/subdivisions with no increase in units that must replace lower-income rental.

Replacement of Affordable Units. The AHPO requires one for one replacement of any affordable units that will be lost, or were recently lost, due to demolition, vacation, or conversion from rental to for-sale. Replacement units must be affordable to households at the incomes of the households that were displaced, as specified within the ordinance. The number of replacement units required is to be determined in accordance with Section 65915 of the California Government Code at the affordability levels determined therein. The ordinance applies the methodology from Section 65915 to the replacement of units occupied by extremely low-income households. Each replacement unit is to have at least the same number of bedrooms as the unit being replaced. The affordability term for rental replacement units is to be at least 99 years from the time of building permit issuance. The initial sale of for-sale units is to be restricted to eligible buyers and require an equity-sharing agreement with the County. Replacement units would generally be required to be provided on-site as part of the new project. Replacement units could be provided through construction of units off-site if the following conditions are met: 1) the affordable replacement units count toward the affordable housing set-aside units required in the Draft Inclusionary Housing Ordinance, and

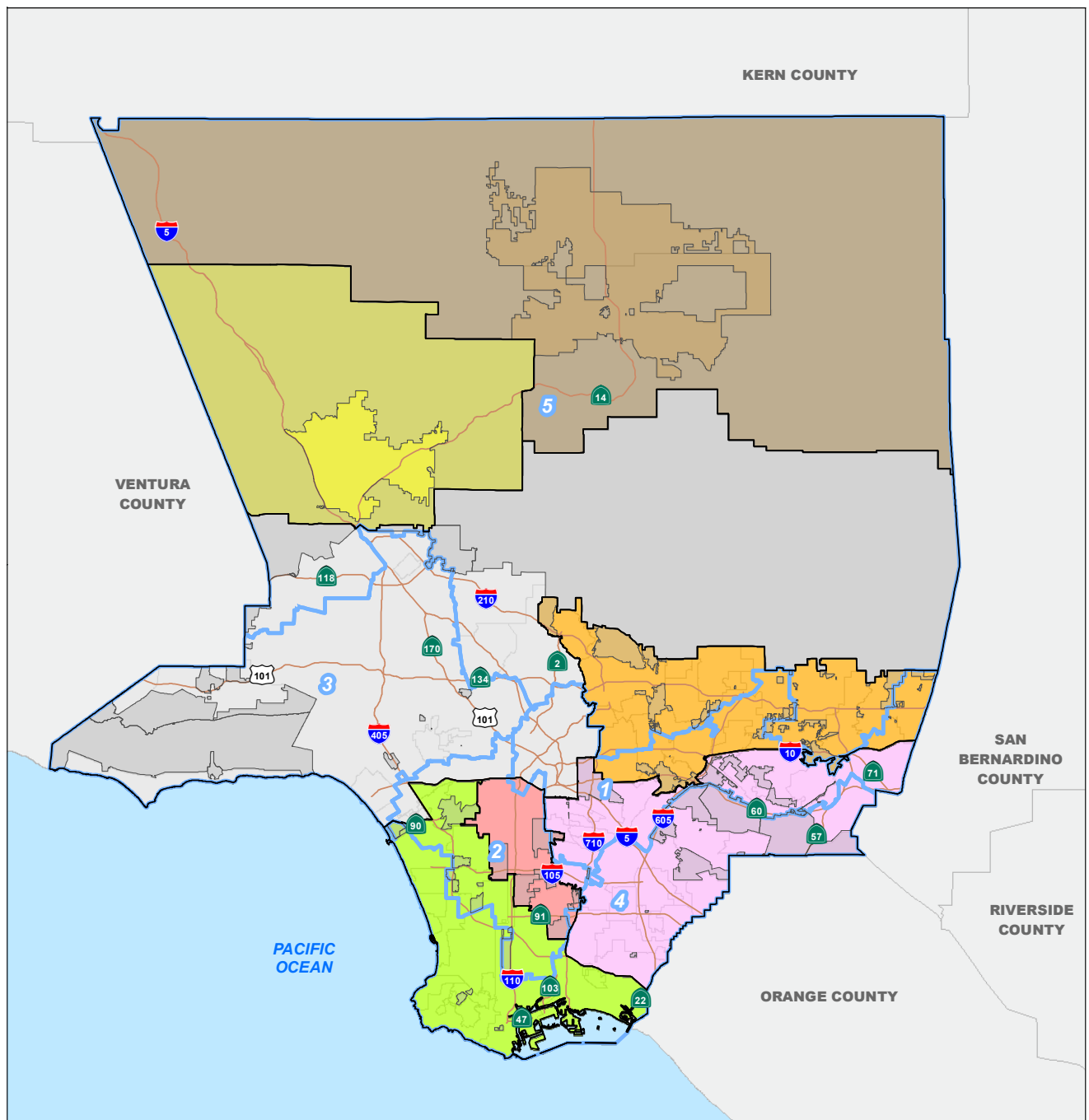
⁶ Government Code §66300(d)(2)(E)(ii)(IV)

the project does not utilize a density bonus;⁷ and 2) the construction of such units does not result in units requiring replacement pursuant to the AHPO.

Condominium Conversions. Converting rental units to market-rate condominiums decreases the overall rental housing stock and causes potential displacement of current tenants. The AHPO would require the replacement of apartment units converted to condos if any of the following conditions apply: 1) the apartment is subject to rent restrictions by covenant for households of moderate, lower, very low, or extremely low income within five years prior to application submittal; 2) the apartment is rent-stabilized within the five years prior to application submittal; 3) the apartment is occupied by lower, very low, or extremely low income households within the five years prior to application submittal; or 4) the apartment is rent-stabilized and withdrawn from rent or lease within the 10 years prior to application submittal. If incomes in non-covenanted units are unknown, Census data may be used to reasonably assume incomes for low income, very low income, or extremely low-income households in the jurisdiction.

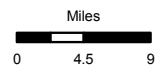
Mobilehome Parks. There are currently 85 mobilehome parks in the unincorporated portions of the County. These mobilehome parks are in both urban and rural parts of the County. Provisions within the AHPO would clarify the process for mobilehome parks to modify density and allow existing legal nonconforming mobilehome parks that exceed current permitted density to use a density bonus to establish their existing density as the maximum allowed. Development standards for mobilehome parks could be modified through a CUP without also requiring a variance.

⁷ Off-site housing must meet inclusionary housing ordinance locational requirements that sites must be located in an unincorporated area of Los Angeles County and be one of the following: within one-quarter mile of the principal project or developed as part of a community land trust. In addition, the off-site parcel, with its developable acreage, zoning and General Plan land use designation, must be sufficient to permit the construction of the required set-aside units for the principal project. .



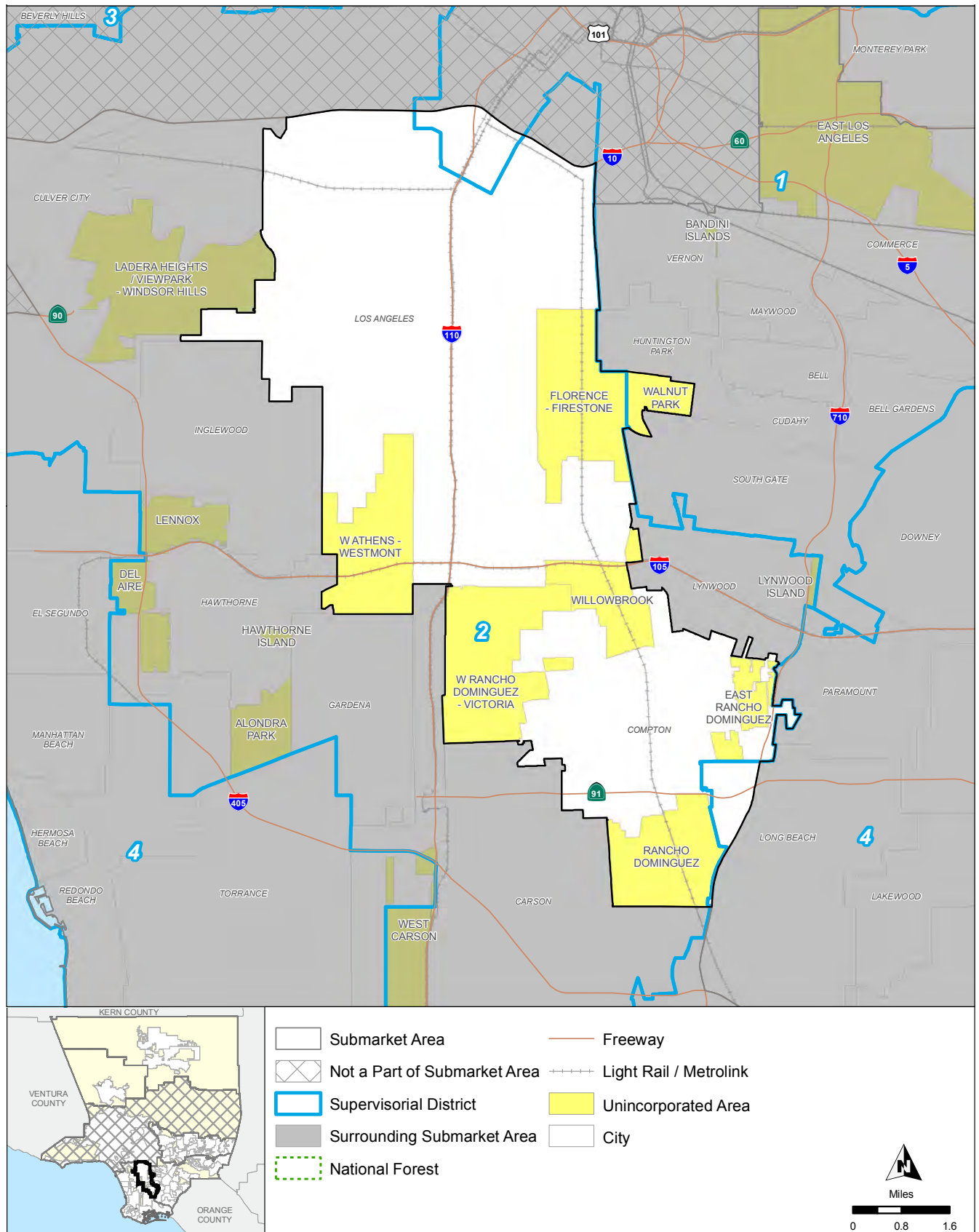
- | | | |
|----------------------------|-------------------------|------------------------|
| Antelope Valley | Not a Part of Submarket | South Los Angeles |
| Coastal South Los Angeles | San Gabriel Valley | Supervisorial District |
| East Los Angeles / Gateway | Santa Clarita Valley | Unincorporated Areas* |

* Unincorporated areas are a transparent gray and come out as a darker color tone on the map



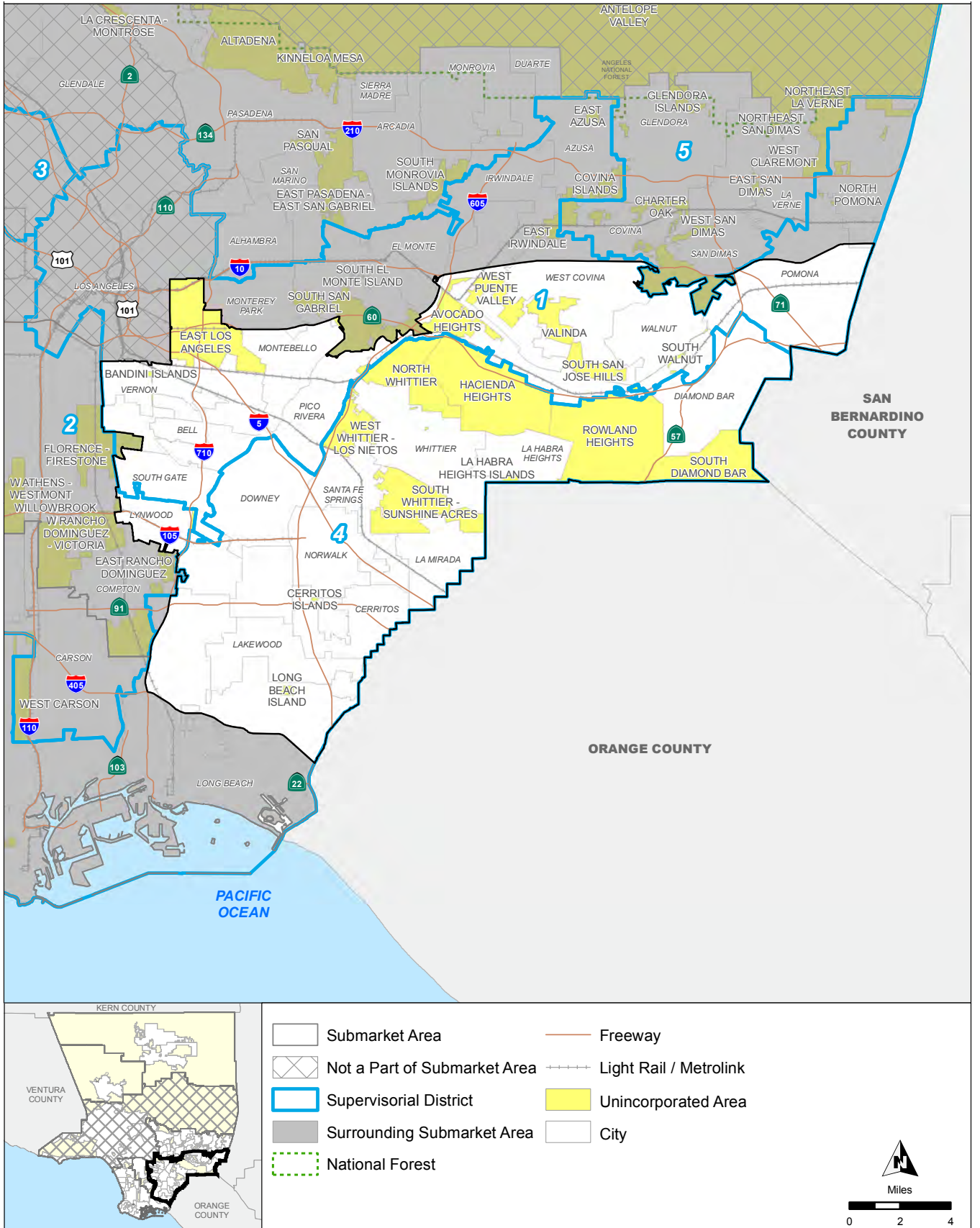
SOURCE: Department of Regional Planning & KMA, 2017

FIGURE 2-3



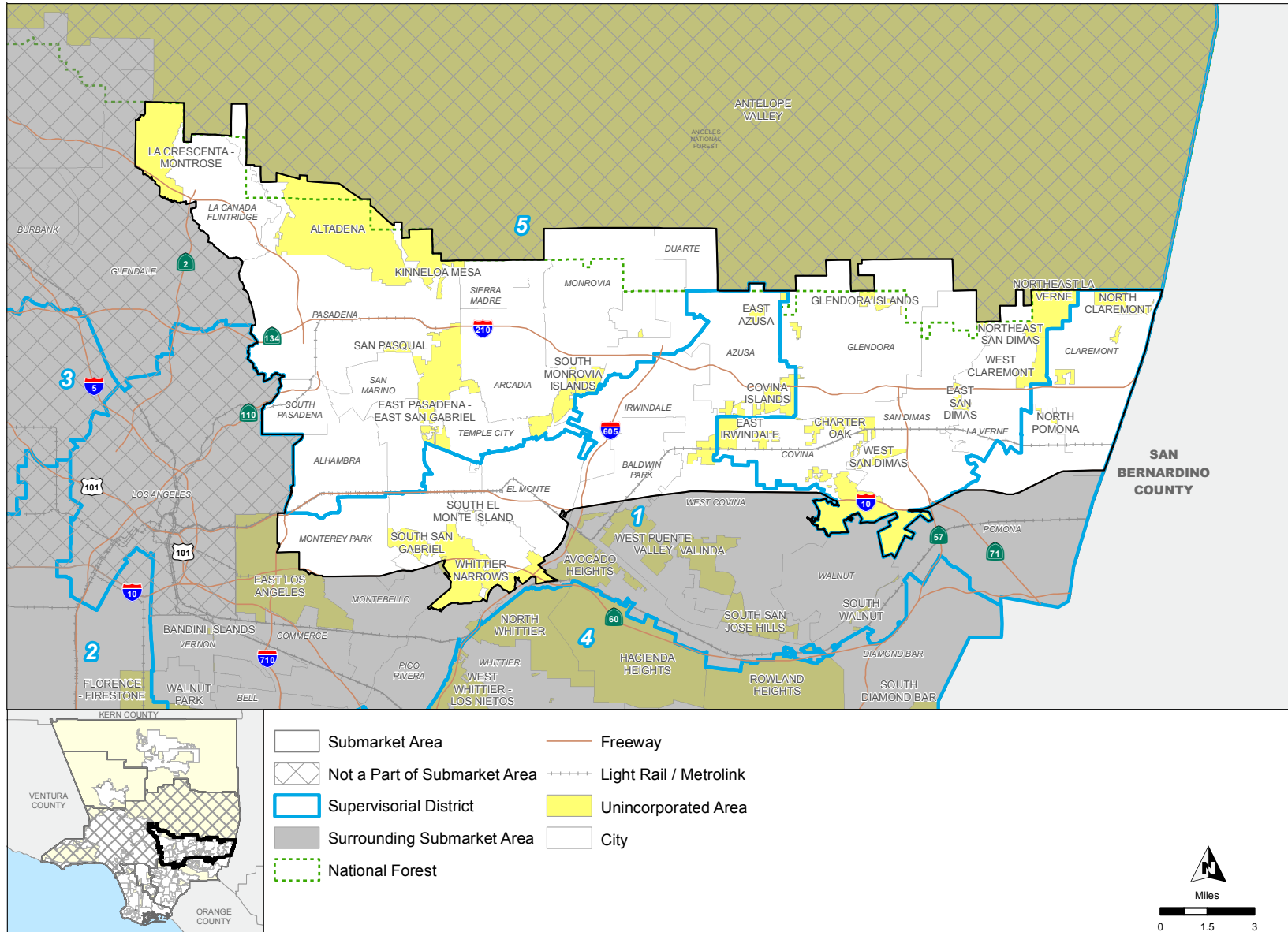
SOURCE: Department of Regional Planning & KMA, 2017

FIGURE 2-5



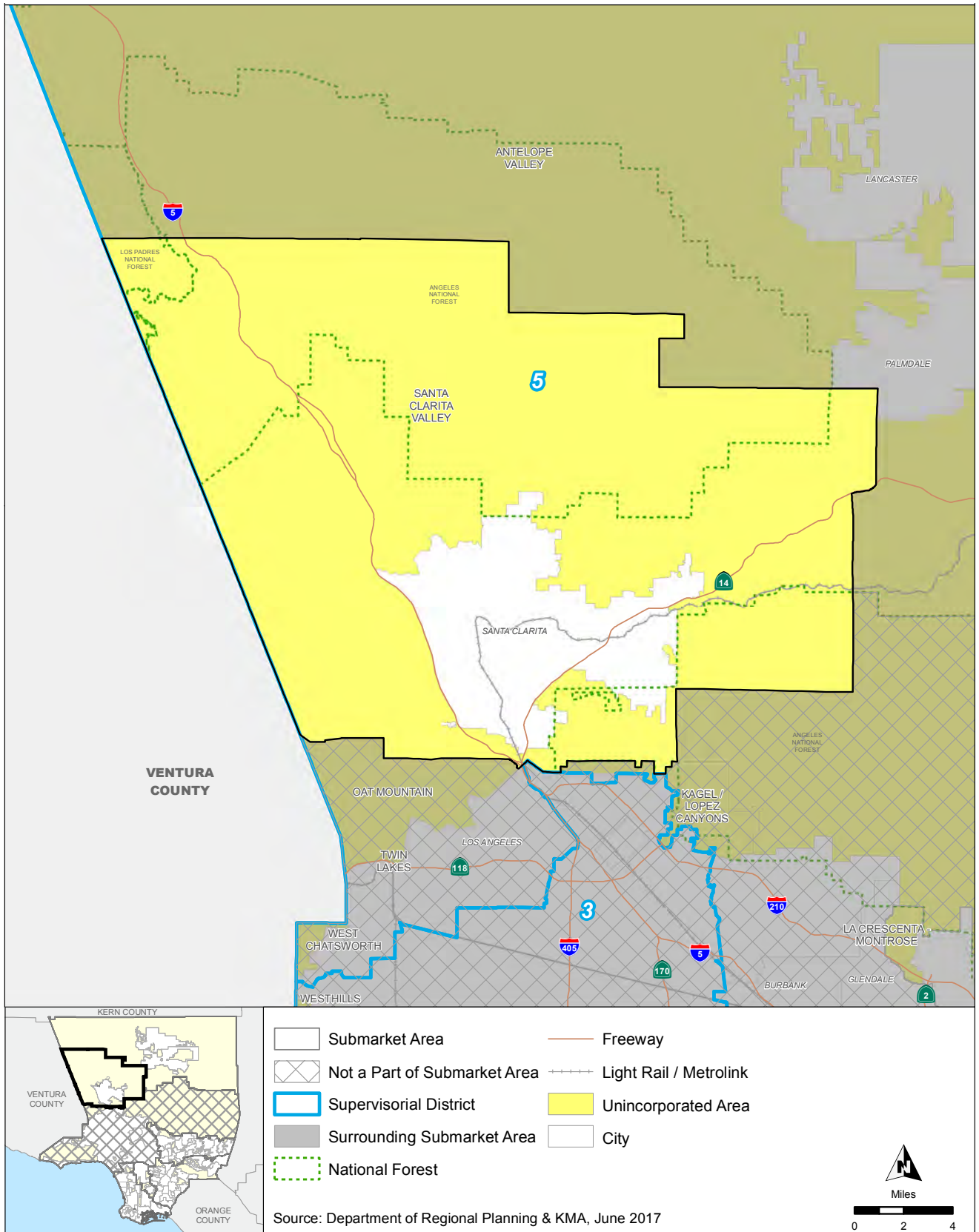
SOURCE: Department of Regional Planning & KMA, 2017

FIGURE 2-6



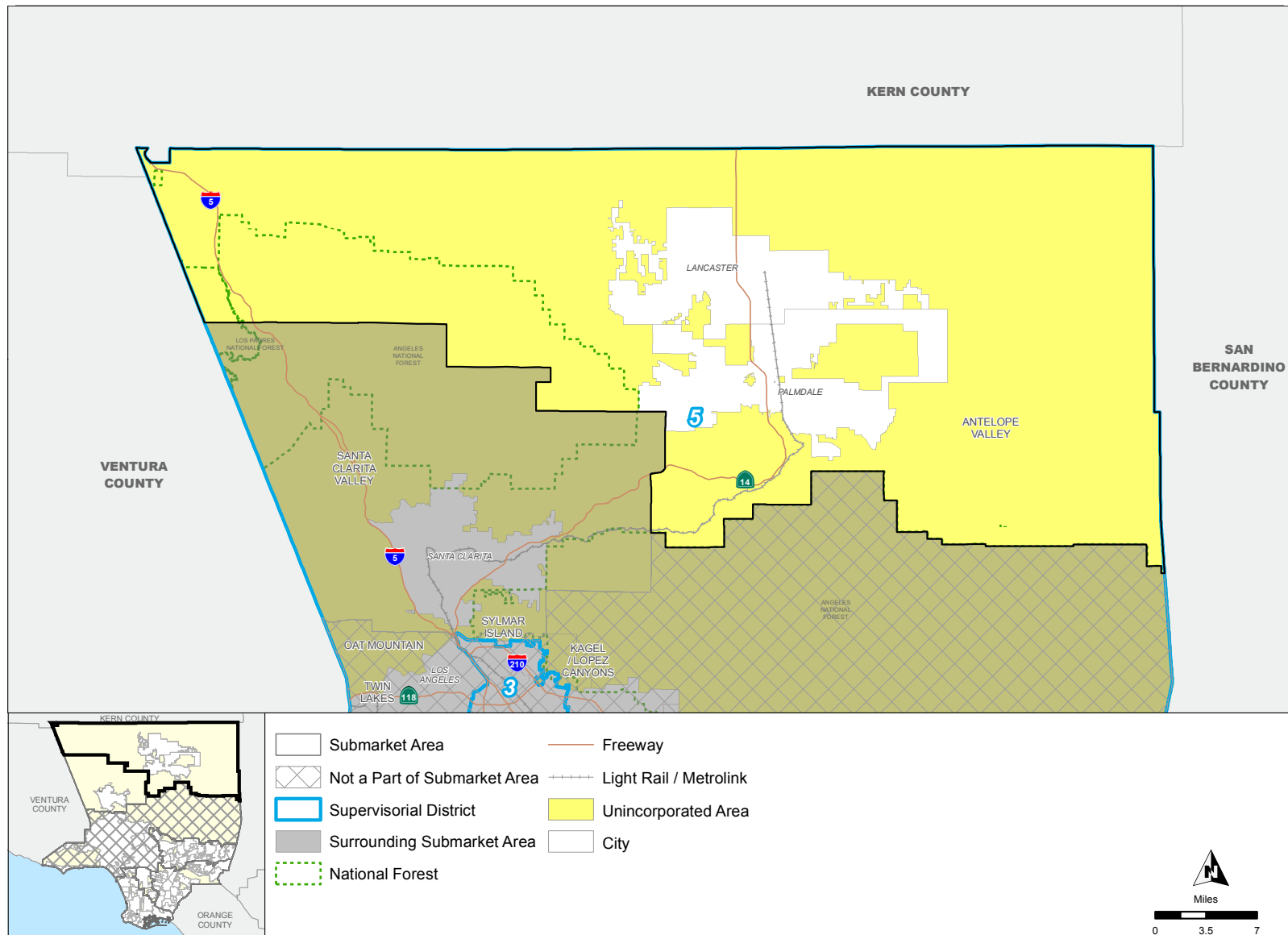
SOURCE: Department of Regional Planning, KMA, 2017

FIGURE 2-7



SOURCE: Department of Regional Planning & KMA, 2017

FIGURE 2-8



SOURCE: Department of Regional Planning, KMA, 2017

FIGURE 2-9

Antelope Valley Submarket Area

The AHPO also allows for in-lieu payment of fees and certain exemptions.

Affordable Housing Replacement Fees – Submarket Areas. Given the geographic, social, and economic diversity of the unincorporated areas, submarket areas were identified based on similar land use, real estate markets, and development activities. The boundaries of each submarket area were identified to ensure that unincorporated areas were entirely located within one submarket area. The submarket areas are as follows and shown in **Figures 2-3** through **2-9**.

- Antelope Valley
- East Los Angeles/Gateway
- Santa Clarita Valley
- Coastal South Los Angeles
- Santa Gabriel Valley
- South Los Angeles

The AHPO uses the boundaries of submarket areas to determine replacement fee payments (as shown in **Table 2-3**) for eligible projects.

Table 2-3
Affordable Housing Replacement Fees

Submarket Area	Fee Per Square Foot of Gross Building Area	Fee Per Unit
Antelope Valley	\$144	\$129,470
Coastal South Los Angeles	\$346	\$318,914
East Los Angeles/Gateway	\$270	\$228,116
San Gabriel Valley	\$268	\$292,277
Santa Clarita Valley	\$174	\$154,294

Source:

Los Angeles County Draft Affordable Housing Preservation Ordinance, Table 22.246.090-A

Projects eligible to pay a fee would be: 1) non-residential projects, and 2) land divisions that have no increase in units and is required to provide replacement rental units.

The replacement fee would be calculated per square foot multiplied by the gross floor area of the units requiring replacement. A per-unit fee applies if the square footage is not known.

Exemptions to the Replacement Provisions of the AHPO. Certain projects are exempt from the replacement requirements of the AHPO. Construction of one principal single-family home, construction or legalization of accessory dwelling units (ADUs) or junior accessory dwelling units (JADUs), projects located in a Very High Fire Hazard Severity Zone or in a Specific Plan area subject to an affordable housing replacement requirement, conversion to resident ownership of all rented spaces in a mobilehome park; addition of mobilehome spaces or mobilehomes in a mobilehome park; and a lease project as defined in Section 21.08.090 in Title 21 (Subdivisions) of the County Code are exempt from replacement requirements.

2.4 PROJECT OBJECTIVES

The objective of the project is to preserve the supply of affordable housing and require affordability of replacement dwelling units to maintain the existing housing stock for extremely low-income to moderate-income households.

2.5 DISCRETIONARY ACTIONS AND APPROVALS

The following actions by the County of Los Angeles will be required in order to implement the AHPO:

- Approval of this Affordable Housing Preservation Project Addendum, and
- Adoption of the Proposed Ordinance to add Chapter 22.119, Chapter 22.268, Section 22.02.055, Section 22.120.075, Section 22.140.680 and amend County Code Sections 21.40.110, 21.44.050, 22.14.010, 22.14.030, 22.14.130, 22.22.030, 22.120.040, 22.120.090, 22.140.370, 22.140.490, 22.166.040, 22.166.070, 22.166.080, 22.172.050, 22.246.020, 22.250.010, 22.250.020 (AHPO would also amend sections that are proposed in the Inclusionary Housing Ordinance and Interim and Supportive Housing Ordinance – 22.121.050.C and 22.128.050).

3.0 ENVIRONMENTAL ANALYSIS

This Section of the Addendum provides an analysis of each environmental factor identified in the General Plan Update EIR to determine whether new or more severe environmental effects could occur from the implementation of the Affordable Housing Preservation Ordinance (AHPO) and whether mitigation measures identified in the General Plan Update EIR would be needed and/or if additional mitigation could be necessary.

In the following evaluation, each topic section includes the following sub-sections:

- **Environmental Checklist.** Contains a modified form of the Appendix G Initial Study environmental checklist. The checklist follows the topic areas as addressed in the General Plan Update EIR. In addition, each checklist question has been modified to address Guidelines § 15162 to allow for yes or no answers to the following questions with respect to each Appendix G factor:
 - Would there be a new significant environmental effect caused by a change in the project or circumstances?
 - Would there be a substantial increase in the severity of a previously identified significant effect caused by a change in the project or circumstances?
 - Is there the potential for substantially more severe significant impacts as a result of new information?
 - Is there the ability to substantially reduce a significant effect as a result of new information but declined by the proponent (the County)?
- The analysis presented for each Appendix G factor identifies the level of impact identified for the General Plan Update EIR and the level of impact anticipated for the Affordable Housing Preservation Ordinance.
- Any change in circumstances or new information relevant to each factor is identified as applicable.
- For each factor, the analysis indicates that impacts would be similar to or less than those identified in the General Plan Update EIR and therefore a Subsequent or Supplemental EIR is not required, and an Addendum is appropriate based on the analysis contained in this Addendum.

3.1 AESTHETICS

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to impacts on scenic vistas?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A scenic vista is generally defined as an expansive view of highly valued landscape or other important scenic features as observable from a publicly accessible vantage point. The diverse landscape of unincorporated areas contains many scenic vistas, including portions of Mulholland Highway, Las Virgenes Road, Malibu Canyon Road, Topanga Canyon Boulevard and Angeles Crest Highway, which are adopted Scenic Highways.

The General Plan Update EIR analyzed potential impacts on scenic vistas and corridors. The General Plan Update EIR found that due to both the broad definition of scenic viewsheds and the substantial amount of new development that would be accommodated by the General Plan Update and associated changes to the Zoning Ordinance, the potential for a substantial adverse impact to a scenic vista could exist. However, the existing regulatory setting, as well as the goals and policies contained in the General Plan Update, would serve to lessen potential impacts to scenic vistas. Additionally, approval of the General Plan Update does not authorize construction of development that would affect scenic vistas. Therefore, under the General Plan Update EIR, impacts were found to be less than significant, and no mitigation measures were required.

Because the AHPO generally requires replacement of affordable units on a one-to-one basis, it is not anticipated to substantially change the location that development would occur. For inclusionary projects, the ordinance would allow for offsite replacement in unincorporated Los Angeles County that meets the locational requirements set out for inclusionary projects (off-site replacement would only be allowed for inclusionary housing projects that do not use a density bonus).¹ Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not increase development compared to what was analyzed in the General Plan Update EIR. Units would not be constructed as a result of the AHPO beyond what is already existing. Some impingement of views

¹ Off-site housing must meet inclusionary housing ordinance locational requirements that sites must be located in an unincorporated area of Los Angeles County and be one of the following: within one-quarter mile of the principal project or developed as part of a community land trust. In addition, the off-site parcel, with its developable acreage, zoning and General Plan land use designation, must be sufficient to permit the construction of the required set-aside units for the principal project.

of scenic resources could occur as a result of the AHPO (either due to development in a new location or added massing to a proposed development), but overall impacts are anticipated to be less than significant. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There are four adopted state scenic highways in the County: Angeles Crest Highway (SR-2), from 2.7 miles north of I-210 to the San Bernardino County line; Mulholland Highway (two sections), from SR-1 to Kanan Dume Road, and from west of Cornell Road to east of Las Virgenes Road; Topanga Canyon Boulevard (SR-27), north from SR-1; and Malibu Canyon–Las Virgenes Highway, from SR-1 to Lost Hills Road. There are also eight eligible scenic highways in the County.

The General Plan Update EIR concluded that no development or changes would occur along or near any of the adopted state scenic highways within the unincorporated areas. The General Plan Update EIR found that while some development or changes could occur near the eligible scenic highways, the development or changes anticipated to occur would be minimal and would only occur near small stretches of the eligible scenic highways. Additionally, future discretionary projects accommodated by the General Plan Update would be subject to separate project-level environmental review in accordance with CEQA, wherein the individual project’s contribution to the degradation of scenic highways would be assessed at the time formal development plans/applications are submitted to the County for review and approval. Furthermore, several goals and policies of the General Plan Update would serve to minimize potential impacts to scenic highways by preventing degradation of existing vistas, as well as by promoting actions that would make existing scenic vistas more accessible to individuals. Therefore, the General Plan Update EIR concluded that no significant impact would result from implementation of the General Plan Update with respect to substantial alteration of scenic resources within a designated scenic highway.

State scenic highways in unincorporated parts of the County are located within Very High Fire Hazard Severity Zones (VHFHSZ), where the replacement requirements of AHPO do not apply. Minor

infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts.

Impacts under the AHPO to other eligible scenic highways would be less than those analyzed in the General Plan Update EIR because individual projects are generally anticipated to be developed within urbanized areas and not in locations where any of these routes could be substantially impacted. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does AHPO Require Subsequent or Supplemental CEQA Documentation with respect to degradation of existing visual character or quality of the site and its surroundings?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Visual character within the County is greatly varied. The County’s mountain ranges, foothills, valleys, basins, beaches, coastal islands, deserts, as well as the built environment and the variety within this category all contribute to the visual character of an area. The General Plan Update EIR concluded that there would be the potential for substantial changes to the visual character of the County, primarily related to the overall magnitude of growth anticipated. However, the guidelines and development standards existing in the regulatory framework would serve to lessen the potential impacts by providing consistency from past to future development. Additionally, several of the guiding principles, goals, policies, and implementation programs contained in the General Plan would serve to lessen or mitigate potential impacts by providing direction for future decision making, as well as by requiring additional future review of potential impacts of individual development projects that would be accommodated by the General Plan Update. Changes in land use included in the General Plan Update are generally limited to portions of the County that feature existing urban development. The introduction of higher density development and mixed uses in these areas would result in small adjustments to the community character and visual appearance of the applicable Planning Areas. Although land use changes are not proposed for the Antelope Valley Planning Area and Santa Clarita Valley Planning Area, these areas are anticipated to experience substantial growth prior to buildout. These areas would likely experience the most substantial changes in visual character and appearance during that period. However, applicable portions of the County Code, and relevant goals and policies of the General Plan would reduce these impacts. Therefore, the General Plan Update EIR found impacts related to changes in visual character to be less than significant.

Because the AHPO would require replacement of affordable units on a one-to-one basis, it generally would not change the location that development would occur. For inclusionary projects, the ordinance would allow for offsite replacement that meets certain locational requirements. The AHPO would not increase development compared to what was analyzed in the General Plan Update EIR. Generally, units would not be constructed as a result of the AHPO beyond what is already existing. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. As such, there would be no substantial change in visual character as a result of AHPO.

As concluded in the General Plan Update EIR, changes in land use would generally be limited to areas that feature existing urban development. Individual projects are generally anticipated to be developed within urbanized areas and would be consistent with urban/suburban visual character. General Plan goals and policies would remain in effect to lessen and mitigate any potential impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that buildout under the General Plan Update would result in the construction of additional development throughout the County, which would generate additional sources of light and glare that could adversely affect day or nighttime views. However, since development would generally occur in urbanized areas where existing lighting and light pollution are already high, these increases in light and glare would not be substantial. In rural areas of the County growth could also potentially diminish nighttime views and/or dark skies, but applicable regulations would minimize these impacts. The General Plan Update EIR found impacts related to light and glare would be less than significant.

Individual projects under the AHPO could introduce new lighting sources. However, the AHPO would generally apply to projects that are already proceeding regardless of the AHPO. Where the AHPO leads to development not on the primary site (i.e., off site replacement of units), such development could lead to new sources of light and glare. However, such off-site replacement units are generally expected to be constructed in areas where development already exists and where existing lighting is typical of urban uses.

The County’s Dark Skies Ordinance protects areas in the Antelope, Santa Clarita and San Fernando valleys and the Santa Monica Mountains North Area from light pollution by requiring measures, such as directing lighting towards the ground. The replacement requirements of the AHPO do not apply to VHFHSZs.

Development of individual projects that are subject to the AHPO would be subject to County requirements that regulate spillover lighting including the Rural Outdoor Lighting Ordinance, which applies to rural areas throughout Los Angeles County. Additionally, the California Building Code contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulation light power and brightness, shielding, and sensor controls. Individual projects would be required to comply with County requirements addressing spillover light and glare, and projects would generally be limited to urbanized areas. The AHPO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

While not specifically addressed by CEQA, the General Plan Update EIR evaluated shade and shadow impacts specifically related to the Antelope Valley Planning Area where the General Plan anticipates development to occur. The AHPO could lead to incrementally larger projects than would otherwise have occurred without the AHPO as units are added to projects to offset the cost of affordable units. However, these projects would likely be in urban areas that would not be substantially affected by these incremental increases in shade/shadow. It is not anticipated that the AHPO would substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.2 AGRICULTURE AND FORESTRY RESOURCES

- (a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the Agricultural Resource Area (ARA) policies under the General Plan would reduce both direct and indirect impacts of conversion of mapped Important Farmland. However, these ARAs would not be agricultural preserves and some conversion to non-agricultural uses would be permitted. As such, impacts due to buildout of the General Plan were identified as significant in the Antelope Valley Planning Area and Santa Monica Mountains Planning Area.

As most of Los Angeles County is 1) urbanized, 2) mountainous terrain unsuitable for intensive commercial agriculture, or 3) land with other constraints that make commercial agriculture infeasible (such as lack of water supply or soil suitability), use of offsite preservation as a mitigation measure would require acquisition of land outside of the County and therefore was considered infeasible. Impacts in the remaining nine Planning Areas were identified as less than significant.

The AHPO does not incentivize development and off-site replacement is restricted in location (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus), the AHPO would not result in substantial construction in areas of Important Farmland as these areas do not contain large numbers of affordable housing units, nor are they zoned for such use. Impacts to the Antelope Valley Planning Area would remain significant as discussed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a conflict with existing zoning for agricultural use, or a Williamson Act contract?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the zoning changes within the General Plan Update would not involve any rezoning of farmland and impacts regarding conversion of farmland to non-agricultural uses would be less than significant. Furthermore, the General Plan Update EIR identified that the only Williamson Act contracts in effect in Los Angeles County are located on Santa Catalina Island, of which there is no Important Farmland mapped. No impact to Williamson Act contracts would occur according to the General Plan Update EIR.

The AHPO would require replacement of lost affordable. Agricultural zoning would not be changed under the AHPO. Impacts to Williamson Act contracts as a result of the development in accordance with the AHPO would not substantially change as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a 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))?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that the General Plan includes the addition of two new zones created for future use in rural areas. However, both of these zones (C-RU and MXD-RU) have only been mapped along commercial corridors and in commercial areas. The remaining zones added as part of the General Plan Update would only be designated in intensely urban areas and would thus not impact forest land. As the County has no existing zoning specifically designating forest use, implementation of the General Plan would not conflict with existing zoning for forest land or timberland. No impact would occur.

The AHPO would require replacement of lost affordable units, while this could occur on forest land such losses and replacement units would involve small areas that are generally anticipated to already be used for housing. The replacement requirements of the AHPO do not apply in VHFHSZs, a designation that applies to forest land in unincorporated Los Angeles County. The AHPO is generally anticipated to apply to areas of the County where development exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a result in the loss of forest land or conversion of forest land to non-forest use?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Forests in the County are largely limited to mountain ranges in three of the eleven Planning Areas: Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains. Small areas of forest are also found at the northern edge of the East San Gabriel Valley and West San Gabriel Valley Planning Areas. The largest concentration of forest is in the Angeles National Forest, which covers 25 percent of the land area of the County. Despite the large extent of the Angeles National Forest, very little of its area contains forests or

woodlands as defined by the California Public Resources Code. Most of the land area in the Angeles National Forest is chaparral or similar scrub communities. Forests in the County are limited to narrow formations along creeks and other watercourses and the highest elevations of the San Gabriel Mountains. The General Plan Update EIR indicates that Forest land within Los Angeles County is protected through the County’s Significant Ecological Area (SEA) Ordinance. As part of the General Plan Update, the County completed minor updates to the SEA designations and policies, including minor changes to the policies, boundaries and technical descriptions of the County’s SEAs. The General Plan Update EIR concluded that compliance with the SEA Ordinance would reduce potential impacts to forest land to a less than significant level.

The Angeles National Forest and Los Padres National Forest lie within the unincorporated areas of Los Angeles County and are managed by the U.S. Forest Service. These forest areas are zoned for watershed, open space, agriculture and a limited amount of low-density residential and rural commercial development. While affordable housing units may be located in these forest areas, any redevelopment including replacement units would generally be expected to impact areas already developed. Therefore, impacts related to the loss of forest land would remain less than significant. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation that would 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR, due to agricultural uses being incompatible with some other land uses, concluded that buildout under the General Plan Update may lead to new nonagricultural uses that develop around existing agricultural uses, which would create pressure for them to be converted to nonagricultural uses. Implementation of Agricultural Resource Area (ARA) policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to incompatible non-agricultural uses. However, ARAs are not agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. The General Plan Update EIR found that in the Antelope Valley Planning Area and Santa Clarita Valley Planning Area there would be a significant indirect impact on conversion of mapped Important Farmland to nonagricultural use due to pressure to convert farmland to non-

agricultural uses and related incompatibilities between agricultural and urban uses. The General Plan Update EIR indicated that there are no feasible mitigation measures to reduce impacts to farmland in these areas. The General Plan Update EIR found that impacts would be less than significant in the nine other Planning Areas.

While small numbers of existing affordable units may be located in areas of Farmland or forest land, the AHPO would not result in development that would result in substantial additional conversion of these areas beyond the existing footprints of development. The AHPO itself would not change any allowable land uses or result in any net additional units as it only requires a one-for-one replacement of affordable units. Therefore, forests and farmlands would not be significantly impacted. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.3 AIR QUALITY

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with or the potential to obstruct implementation of the applicable air quality plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that the Antelope Valley Air Quality Management District (AVAQMD) and the South Coast Air Quality Management District (SCAQMD) consider a project consistent with the air quality management plan (AQMP) if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, vehicle trips, or vehicle miles traveled (VMT) are deemed to not exceed this threshold. Based on projections from the Southern California Association of Governments (SCAG), buildout of the General Plan Update in 2035 would result in higher populations for the unincorporated areas of the County. The General Plan Update EIR concludes that individual development projects would be consistent with the control measures and regulations identified in the SCAQMD and AVAQMD’s AQMPs. However, the General Plan Update EIR found that development would not be consistent with the AQMPs because the buildout in the unincorporated areas would exceed forecasts in the AQMP. As such, the impact was found to be significant and unavoidable.

The AHPO would require one-for-one replacement of any affordable units that are lost due to demolition or vacation as part of a project. The AHPO would not increase the growth and development beyond what is anticipated from buildout of the General Plan Update. Since the release of the General Plan Update, the SCAQMD adopted an updated AQMP in 2017 that incorporates SCAG’s updated population projection numbers from the 2016/2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that would account for the population increase in unincorporated areas of the County. However, the AVAQMD’s Ozone Attainment Plan has not been updated and as a result there is the potential for development from the General Plan Update to exceed the AVAQMD’s plan. Generally, the AHPO would not result in a substantial increase in units. The AHPO would not substantially change impacts related to any air quality management plan as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the potential to violate any air quality standard or contribute substantially to existing or projected air violation?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that due to the scale of development activity associated with the buildout of the General Plan Update, construction activities would likely generate criteria air pollutant emissions that would exceed SCAQMD’s and AVAQMD’s regional significance thresholds and would contribute to the nonattainment designations of the South Coast Air Basin (SoCAB) and Antelope Valley portion of the Mojave Desert Air Basin (MDAB).

The General Plan Update EIR indicates that construction activities associated with buildout could expose people to Valley Fever within the arid, desert portions of the unincorporated areas of the County. The General Plan Update EIR indicates that individual projects are required to reduce the potential risk of exposing sensitive receptors to Valley Fever through implementation of AVAQMD and SCAQMD fugitive dust control measures. SCAQMD and AVAQMD dust control rules would reduce fugitive dust emissions as well as exposure to on-site workers. General Plan Update policies, including Policy AQ 1.3 (Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible), would further reduce the impacts from fugitive dust during construction.

The General Plan Update EIR concludes that construction emissions must be addressed on a project-by-project basis and that for a broad-based General Plan Update, it is not possible to determine whether the

scale and phasing of individual projects could result in the exceedance of the SCAQMD's or the AVAQMD's short-term regional or localized construction emissions thresholds. **Mitigation Measure AQ-1** (construction equipment and procedures), regulatory measures, as well as goals and policies in the General Plan Update would reduce air pollutant emissions. However, due to the likely scale and extent of construction activities pursuant to the future development that would be accommodated by the General Plan Update, at least some projects would likely continue to exceed the SCAQMD and AVAQMD thresholds. Therefore, the General Plan Update EIR determined construction- and operation-related air quality impacts of the buildout of the General Plan would be significant and unavoidable.

The AHPO would require development projects to replace lost affordable units on-site or off-site in limited cases as allowed by the AHPO. While overall total emissions in the future are expected to be less than today (as a result of emissions controls), there is the potential for violations of standards adjacent to individual construction sites. As with development under the General Plan Update, it is not possible to determine the scale or phasing of individual projects. An evaluation of the construction emissions would be undertaken on a project-by project basis. The AHPO could result in an incremental increase in construction emissions attributable to replacement units but such increases are expected to be minor even where replacement units are constructed off-site. Multiple such projects could lead to emissions exceeding regional thresholds and therefore emissions associated with construction could be significant. Such emissions would be within the assumptions identified in the General Plan Update EIR. As indicated in the General Plan Update EIR, the risk posed from Valley Fever would be reduced to less than significant levels with the implementation of the SCAQMD or AVAQMD's fugitive dust measures. However, even with the implementation of **Mitigation Measure AQ-1**, regulatory measures, as well as general plan goals and policies, it is likely that some projects would exceed the relevant SCAQMD and AVAQMD criteria air pollutant thresholds, as described above, these impacts were fully disclosed within the General Plan Update EIR and no new or greater impacts would occur.

Individual projects would result in emissions as a result of mobile sources (vehicles) and stationary sources (heating, ventilation and air conditioning, lighting, landscape equipment). On some sites (such as redevelopment) existing uses already generate emissions. However, because specific sites are not known, such existing uses (and therefore associated emissions) are unknowable at this time. Overall development and associated emissions would be within assumptions for the unincorporated County of Los Angeles as analyzed in the General Plan Update EIR.

The AHPO would not substantially change construction or operational air quality impacts relative to violation of air quality standards as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that buildout of the land use plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD’s and AVAQMD’s regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. **Mitigation Measure AQ-1** as well as General Plan Update goals and policies would reduce these impacts. However, due to the magnitude of emissions generated by the buildout, mitigation measures would not reduce impacts below SCAQMD’s or AVAQMD’s thresholds. The General Plan Update EIR found impacts would be less than significant.

The AHPO would not increase the growth and development beyond what is evaluated in the General Plan Update EIR. Generally, the AHPO would not result in a substantial increase in development.

The AHPO would not result in growth greater than evaluated in the General Plan Update EIR or growth anticipated in the 2016 AQMP. The AHPO would not substantially change cumulative air quality impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the potential to expose sensitive receptors to substantial pollutant concentrations?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR identifies a land use plan that would result in the operation of new land uses and would generate new sources of criteria air pollutants and toxic air contaminants (TACs).

SCAQMD and AVAQMD consider projects that cause or contribute to an exceedance of the California Ambient Air Quality Standards (CAAQS) or the National Ambient Air Quality Standards (NAAQS) to

result in significant impacts. Due to the scale of development activity associated with buildout of the General Plan Update, emissions could exceed the SCAQMD and AVAQMD regional significance thresholds and therefore, in accordance with the SCAQMD and AVAQMD methodology, may result in a significant localized impact. Those projects of sufficient size to result in significant air quality are generally expected to require discretionary review and would be evaluated and mitigated as appropriate on a project-by-project basis. The General Plan Update EIR indicated that, due to the broad-based nature of the EIR it was not possible to determine whether the scale and phasing of individual projects would result in the exceedance of localized emissions thresholds. Nevertheless, because of the likely scale of future development that would be accommodated by the General Plan Update, at least some projects were expected to individually exceed the CAAQS and/or NAAQS.

The General Plan Update EIR also indicated that operation of new land uses, consistent with the General Plan Update, could also generate new sources of TACs within the unincorporated areas from various industrial and commercial processes (e.g., manufacturing, dry cleaning). Stationary sources used as emergency power supply to communication equipment could also generate new sources of TACs and particulate matter. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD or AVAQMD include industrial land uses, such as chemical processing facilities, dry cleaners, and gasoline-dispensing facilities. In addition to stationary/area sources TACs, warehousing operations could generate a substantial amount of diesel particulate matter emissions from off-road equipment use and truck idling. New land uses in the unincorporated areas that generate truck trips (including trucks with transport refrigeration units) could generate an increase in DPM that would contribute to cancer and non-cancer risks in the SoCAB or Antelope Valley portion of the MDAB. These land uses could be near existing sensitive receptors within the unincorporated areas. Since the nature of these emissions could not be determined at the time of General Plan Update preparation, the impacts are considered significant. **Mitigation Measure AQ-3** requires projects that will cite new sensitive receptors within a certain distance of land uses associated with high levels of TAC emissions to prepare a health risk assessment and, if necessary, apply additional on-site mitigation. Therefore, sensitive receptors placed near major sources of air pollution would achieve the incremental risk thresholds established by SCAQMD and AVAQMD. The General Plan Update EIR found impacts would be less than significant.

As discussed above, the AHPO would not increase growth and development beyond what is anticipated in the General Plan Update EIR nor would the ordinance substantially change the location in which development would occur. The AHPO would not generate new sources of mobile or stationary-source TAC emissions typically associated with industrial or commercial processes.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to

consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project, as well as other impacted individuals.

However, **Mitigation Measure AQ-3** requires projects that will cite new sensitive receptors within a certain distance of land uses associated with high levels of TAC emissions to prepare a health risk assessment and, if necessary, apply additional on-site mitigation. The AHPO would not substantially change air quality impacts relative to sensitive receptors as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to creating objectionable odors affecting a substantial number of people?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that industrial land uses associated with the General Plan Update could create objectionable odors. However, **Mitigation Measure AQ-4** (odor management plan) would ensure that odor impacts are minimized, and facilities would comply with SCAQMD and AVAQMD Rule 402. The General Plan Update EIR found impacts would be less than significant.

The AHPO would provide for replacement of lost affordable units. The AHPO itself would not change any allowable land uses and generally would not result in any net additional units as it only requires a one-for-one replacement of affordable units. The AHPO would not encourage the development of industrial land uses that could create objectionable odors. Residential use is not associated with odor nuisance and therefore this impact is less than significant. The AHPO would not substantially change odor impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.4 BIOLOGICAL RESOURCES

(a) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to having 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 (USFWS)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the policies from the General Plan Update, including updates to the Significant Ecological Area (SEA) designations and policies will have direct and indirect beneficial impacts for special-status species by emphasizing avoidance and minimization of impacts to habitats and encouraging greater protection for habitat and resources. However, the buildout of the General Plan Update will result in impacts to various habitat types, which will result in the loss of special-status species through direct mortality or via indirect effects (e.g., through wildlife habitat loss and edge effects at the urban-wildland interface). **Mitigation Measure BIO-1** (biological resources assessment report) would ensure that, on a project-specific level, necessary surveys are conducted, and a biological resources assessment is prepared to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. **Mitigation Measure BIO-2** (pre-construction surveys) would ensure that no direct mortality to special-status species would occur with implementation of construction activities by requiring pre-construction surveys (and construction monitoring where warranted) for special-status species as necessary.

Although direct impacts to special-status species would be mitigated, there is no mitigation provided for the indirect impacts to special-status species through the loss of common (i.e., non-sensitive) habitats. Special-status species are dependent on a variety of habitat types (comprised of both common and sensitive habitats), and the conversion of common habitat types with the buildout of the General Plan Update would result in the overall reduction of habitat and resources to support special-status species. The General Plan Update EIR found impacts would be significant and unavoidable.

The AHPO would not make changes to the SEA designations or policies. SEAs often overlap with VHFHSZs. As discussed above, the replacement requirements of the AHPO do not apply to VHFHSZs.

The AHPO would apply to areas where residential use is the primary use and where a site is already developed with affordable housing. Generally, areas already developed with affordable housing and areas

where replacement units may be constructed provide little, if any, biological resources in the form of habitat, species or plant communities therefore, threatened, endangered, protected and sensitive species, and habitats, are not anticipated to be affected. Any AHPO projects which occur within SEA designated areas would be subject to all existing regulations in the SEA. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. **Mitigation Measures BIO-1** and **BIO-2** would remain in effect to mitigate potential direct impacts to a less than significant level. However, indirect impacts would remain significant and unavoidable, as was determined in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to having a substantial adverse effect on any riparian habitat or sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update incorporates proposed SEAs to identify the County’s most sensitive biological resources, which includes riparian habitat and sensitive plant communities. However, the SEAs do not guarantee preservation, nor do they protect all riparian habitat and sensitive plant communities found within Los Angeles County. Implementation of all of these policies will have both direct and indirect beneficial effects for riparian habitat and sensitive plant communities by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, and by emphasizing avoidance, minimization, and mitigation of impacts to habitats. However, the buildout of the General Plan Update will impact various habitat types, including riparian habitat and other sensitive plant communities. Thus, The General Plan Update EIR concluded that buildout would have a significant adverse effect on these resources.

Mitigation Measure BIO–1 would ensure that, on a project-specific level, necessary surveys are conducted and a biological resources assessment is prepared to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. **Mitigation Measure BIO–3** (wildlife corridors and nursery sites) would ensure that unavoidable impacts to sensitive habitats are mitigated with the environmentally superior mitigation; thus, with implementation of this mitigation measure, impacts to

sensitive habitat would be considered less than significant. The General Plan Update EIR found impacts would be less than significant.

Many of the areas with the most sensitive natural communities such as SEAs, Hillside Management Areas (HMAs), and coastal habitat are either devoid of residential uses or are developed with residences for upper income households. It is unlikely that affordable housing units exist in such areas. In addition, zoning restrictions make the development of residential uses in sensitive areas difficult. Sensitive areas have building requirements and discretionary permit review processes to protect the most sensitive natural communities in the unincorporated areas. In 2019, the County adopted the SEA Ordinance which established permitting requirements, development standards, and review processes for developments within SEAs. Therefore, new projects proposed within a SEA would be subject to the ordinance and subject to all existing regulations. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. While the AHPO could apply in these SEAs, any requirement for replacement units is expected to involve a small number of units in areas already developed with housing. Such projects would not be likely to occur in areas with substantial sensitive natural communities. Any projects that may occur in such areas would be subject to **Mitigation Measure BIO-1** and **BIO-3** would remain in effect to reduce potential impacts to a less than significant level. Furthermore, SEAs are frequently located within VHFHSZs, where the replacement requirement of the AHPO does not apply.

The AHPO would not result in substantial housing construction in sensitive natural communities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to having a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that buildout of the General Plan Update may impact wetland areas and these impacts may have a significant adverse effect on wetlands through hydromodification, filling, diversion or change in water quality. **Mitigation Measure BIO-1** would ensure that, on a project-specific level, necessary surveys are conducted and a biological resources assessment is prepared to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. In addition,

for wetlands under the jurisdiction of the USACE, CDFW, and/or RWQCB, as well as waters and riparian habitat under their respective jurisdictions, permits and mitigation may be required, subject to the approval of the regulatory agencies. Furthermore, project locations with plant communities considered sensitive by the CDFW must be analyzed under CEQA. The General Plan EIR found impacts with implementation of these mitigation measures in combination with the requirements for regulatory permitting (e.g., Section 404 permitting and any associated mitigation requirements), impacts to wetlands would be considered less than significant.

The AHPO requires one-for-one replacement of any affordable housing units that are lost due to demolition or vacation as part of a project. The AHPO would not increase the overall growth and development beyond what is anticipated in the General Plan Update EIR, nor would the ordinance change the location of planned development. Unincorporated Los Angeles County contains areas with coastal wetlands, drainages, marshes and vernal pools. Development in these areas is highly regulated and subject to restrictions. Any impact related to implementation of the AHPO would be within those evaluated in the General Plan Update EIR.

Any impacts to federal or state protected wetlands and waters of the United States would be limited due to existing regulations and building requirements including discretionary permit review processes designed to protect the most sensitive marshes, vernal pools, coastal wetlands, and drainages. Since the most sensitive of these resources are protected by existing regulations, the impacts of the AHPO would be less than what was disclosed in the General Plan Update EIR.

For waterways in the unincorporated areas that are not located in special management areas, the General Plan Update includes polices to preserve wetlands and streambeds. In addition, state and federal agencies are involved in the review and permitting of projects in these areas when necessary. Therefore, the AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to interfering 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

According to the General Plan Update EIR, Los Angeles County supports seven regional wildlife linkages: San Gabriel – Castaic Connection, San Gabriel – San Bernardino Connection, Santa Monica – Sierra Madre Connection, Sierra Madre – Castaic Connection, Tehachapi Connection, Antelope Valley Connection, and the Puente Hills – Chino Hills Connection. There are 11 linkages along principal water courses, nine linkages along ranges of mountains and hills, and an important linkage along the San Andreas Fault.

Policies within the General Plan Update, including updates to the SEA Ordinance, have both direct and indirect beneficial effects protecting regional wildlife linkages and facilitating wildlife movement by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas. However, the General Plan Update EIR indicated that buildout could impact regional wildlife linkages and nursery sites, constituting a potentially significant adverse effect on wildlife movement and nursery sites. **Mitigation Measure BIO-1** and the update to the SEA Ordinance may provide some protection to avoid or minimize impacts to wildlife corridors and nursery sites; however, for those projects where avoidance or minimization of impacts is infeasible, the policies proposed in the General Plan Update do not provide for mitigation for loss of wildlife movement opportunities or nursery sites. If development impacts regional wildlife linkages and impedes wildlife movement, connectivity will be lost on a regional scale in these vital landscape corridors and linkages. Thus, the General Plan Update EIR found impacts would be significant and unavoidable.

Many of the areas that are identified as wildlife linkages or that serve as important habitat and/or connections between habitat and wildlife migratory routes, are zoned for watershed, open space, agriculture and a limited amount of low-density residential development. While limited amounts of affordable housing could occur in proximity to these sensitive areas, any replacement units are generally anticipated to occur in the footprint of existing development because of the small number of units involved and restrictions on location of off-site units (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). The AHPO would not increase development beyond what is already anticipated under the General Plan Update. Any projects developed within an SEA would be subject to existing regulations. Therefore, the AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflicts with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that development will impact oak trees and oak woodlands. The County Oak Tree Ordinance and Oak Woodlands Conservation Management Plan (OWCMP) are applied on a project-specific level and consistency with these plans is determined on a project-by-project basis. The General Plan Update EIR found that the policies of the General Plan Update support the conservation of oak trees and oak woodlands and do not conflict with the County Oak Tree Ordinance or OWCMP. The General Plan EIR found impacts would be less than significant.

There are oaks and other unique native trees within the unincorporated areas of Los Angeles County. AHPO projects would be subject to the Oak Tree Ordinance. Further, the removal of oak trees requires appropriate permits and approvals through the Los Angeles County Department of Regional Planning, such as Oak Tree Permits. The AHPO would not make any changes to the County Oak Tree Ordinance or OWCMP. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(f) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to compliance with adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Los Angeles County’s coastal zone contains valuable biological resources, including San Clemente Island, Santa Catalina Island, Marina del Rey, Ballona Wetlands and the Santa Monica Mountains. The study and management of these resource areas is more rigorous than other areas in Los Angeles County, and any land disturbance is regulated through coastal land use plans and local coastal programs (LCPs), in compliance with the California Coastal Act. The General Plan Update EIR found that the policies of the General Plan

Update would not conflict with these goals and policies of these plans and LCPs. The General Plan Update EIR found impacts would be less than significant.

The AHPO would not make any changes to the coastal land use plans and local coastal programs. The AHPO applies to all unincorporated areas in Los Angeles County, which includes substantial biological resources mentioned of San Clemente Island, Santa Catalina Island, Marina del Rey, Ballona Wetlands, and the Santa Monica Mountains. While limited amounts of affordable housing may be located in proximity to these sensitive resources any replacement units are generally anticipated to occur in the footprint of existing development because of the small number of units involved and restrictions on location of off-site units. Further, Marina del Rey would not be subject to the AHPO.

There would continue to be no conflict with respect to compliance with any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.5 CULTURAL RESOURCES

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a historical resource as defined in §15064.5?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that compliance with the goals, policies, and implementation measures of the General Plan Update would reduce impacts to historical resources. However, the policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the General Plan Update. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur in the future. The General Plan Update EIR found that even with implementation of **Mitigation Measures CUL-**

1 (Mills Act incentives), CUL-2 (draft a historic preservation ordinance), and CUL-3 (draft an adaptive reuse ordinance) impacts would be significant and unavoidable.

The AHPO applies to affordable housing in all unincorporated areas of Los Angeles County. However, the Historic Preservation Ordinance and State Historic Building Code, if applicable, would be applied on a project by project basis and would protect historic buildings in unincorporated areas. As for development under the General Plan Update, it is not possible to determine exactly where development subject to the AHPO would occur. The policies within the General Plan Update would continue to minimize the probability of historic structures being demolished and **Mitigation Measures CUL-1, CUL-2, and CUL-3** would reduce impacts to historic resources. Any project that includes an historical resource, as defined by PRC § 21084.1 that meet PRC § 5024.1(g) as potentially eligible, would require discretionary review to ensure the development meets Secretary of Interior Standards for Rehabilitation or Reconstruction. This process would require that in order to grant the incentives or waiver, the project would not have a specific adverse impact on a property that is listed in the California Register of Historic Places, or the incentive or waiver would have a specific adverse impact for which there is a feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the housing development unaffordable. If the findings are not met, projects requesting to modify development standards will be subject to a discretionary review process and a project-specific environmental analysis under CEQA.

Based on the above, it is speculative at this time to identify the loss of any particular resource. However, impacts to historical resources are identified and disclosed in the General Plan Update EIR. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that forecast development could impact known and unknown archaeological sites. Locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The County is considered potentially sensitive for archaeological resources. Thus, ground disturbance has a high potential for uncovering archaeological resources.

However, existing federal, state, and local regulations address the provision of studies to identify archaeological and paleontological resources; application review for projects that would potentially involve land disturbance; project-level standard conditions of approval that address unanticipated archaeological discoveries; and requirements to develop specific mitigation measures if resources are encountered during any development activity. The General Plan Update EIR found impacts would be less than significant with implementation of **Mitigation Measures CUL-4** (archaeologist monitoring) and **CUL-5** (paleontologist monitoring), which apply in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site.

The AHPO applies to replacement of existing affordable housing on sites that are proposed for redevelopment regardless of the AHPO, as such, these sites are already disturbed, and the likelihood of impacts related to archeological resources would be low. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. If unexpected archaeological or paleontological resources are discovered during excavation activities such resources must be evaluated in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code §21083.2. Health and Safety Code §7050.5, Public Resource Code §5097.98, and Guidelines § 5064.5(e) address how unexpected finds of human remains are to be handled. In addition, mitigation measures identified in the General Plan Update EIR would apply to development under the AHPO.

Based on the above, it is speculative at this time to identify the loss of any particular resource. However, impacts to archaeological resources are identified and disclosed in the General Plan Update EIR. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that ground disturbance could damage fossils buried in soils. Abundant fossils occur in several rock formations in the County. These formations have produced numerous important fossil specimens. Therefore, the County contains significant, nonrenewable, paleontological resources and are considered to have high sensitivity. The General Plan Update EIR requires implementation of **Mitigation Measures CUL-4** and **CUL-5** to reduce impacts to a less than significant level.

The AHPO applies to replacement of existing affordable housing on sites that are proposed for redevelopment regardless of the AHPO, as such, these sites are already disturbed, and the likelihood of impacts related to archeological resources would be low. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas. In cases where undeveloped parcels are found to contain paleontological resources, or parcels that are adjacent to paleontological resources, may have to undergo mitigation per consultation with a designated paleontologist or archeologist, consistent with **Mitigation Measure CUL-4** (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. In the event that paleontological resources are encountered during excavation, the project would be required to halt all development activities and retain the services of a qualified paleontologist, who can advise when construction activities can recommence, per the PRC §5097.5. Compliance with these guidelines would ensure no new or greater impacts would occur.

Based on the above, it is speculative at this time to identify the loss of any particular resource. However, impacts to paleontological resources are identified and disclosed in the General Plan Update EIR. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to disturb any human remains, including those interred outside of formal cemeteries?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR determined that since there are thousands of archaeological sites within Los Angeles County, and human habitation in Los Angeles County is known to date to at least approximately

7,000 years B.C., human remains could be buried in soils. Excavation during construction activities has the potential to disturb human burial grounds, including Native American burials, in underdeveloped areas of the County. However, there PRC § 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The Health and Safety Code (§§ 7050.5, 7051, and 7054) also has provisions protecting human burial remains from disturbance, vandalism, or destruction. The General Plan Update EIR found impacts would be less than significant upon compliance with these regulations.

Projects subject to the AHPO would be required to comply with PRC § 5097.98 as well as the Health and Safety Code (§§ 7050.5, 7051, and 7054).

While there is some potential to disturb human remains at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Tribal Cultural Resources

Assembly Bill 52 (Chapter 532, Statutes 2014) required an update to Appendix G of the *CEQA Guidelines* to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. However, at the time of the General Plan Update and per Senate Bill 18, county must consult with the NAHC and any appropriate Native American tribe before the adoption, revision, amendment, or update of a county’s general plan. While the *CEQA Guidelines* have since been updated, the General Plan Update EIR did analyze impacts on tribal cultural resources in Section 5.5 Cultural Resources. Discussion of the General Plan Update EIR findings and analysis of AHPO impacts to tribal cultural resources are discussed below.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to use a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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:

- (e) 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)?
- (f) 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that development of projects pursuant to the General Plan Update could impact known and unknown archaeological sites. The General Plan Update EIR noted that at the time there were 85 Native American sacred sites under CEQA in association with archaeological resources or, in the case of burial locations, human remains. The Project Area is considered potentially sensitive for archaeological resources. However, **Mitigation Measure CUL-4**, which applies in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, would reduce impacts to a less than significant level.

The AHPO applies to replacement of existing affordable housing on sites that are proposed for redevelopment regardless of the AHPO, as such, these sites are already disturbed and the likelihood of impacts related to resources would be low. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas. Off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. **Mitigation Measure CUL-4** would continue to apply and impacts would be reduced to a less than significant level. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.6 GEOLOGY AND SOILS

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the County. The following analysis recaps the General Plan Update EIR for informational purposes, but potential impacts of the environment on a project are no longer considered potentially significant per the CBIA v. BAAQMD decision.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) 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? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?
 - iv) Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rupture of a Known Earthquake Fault

The General Plan Update EIR concluded that residents, occupants, or structures would potentially be exposed to seismic related hazards. Implementation of the General Plan Update at buildout would increase numbers of residents, workers, and structures in Los Angeles County. The siting of buildings would have to comply with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act, the purpose of which is to prevent the construction of residential buildings on top of the traces of active faults. The General Plan Update EIR found impacts would be less than significant upon compliance to applicable laws and setbacks from active fault traces.

The AHPO would not increase development beyond what is anticipated under the General Plan Update, as it requires one to one replacement of affordable housing. Mobilehome parks are subject to the State’s seismic safety regulations outlined in Title 25 of the California Code of Regulations. Residential projects subject to the AHPO would have to comply with the Alquist-Priolo Earthquake Fault Zoning Act, regardless of whether replacement units are provided on- or off-site. Development under the AHPO would not exacerbate existing earthquake faults and associated risks conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Strong Seismic Ground Shaking

The General Plan Update EIR explains that development projects are required to adhere to the provisions of the California Building Code (CBC). Projects are required to undertake detailed, site-specific

geotechnical investigations. The geotechnical investigations identify seismic design parameters pursuant to CBC requirements, including foundation and structural design recommendations, as needed, to reduce hazards to people and structures arising from ground shaking. The General Plan Update EIR found impacts would be less than significant upon compliance with the requirements of the CBC for structural safety during a seismic event.

All projects including those subject to the AHPO are required to comply with CBC requirements. Each future development would be preceded by a detailed, site-specific geotechnical investigation. Development under the AHPO would not exacerbate existing ground shaking. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Liquefaction

The General Plan Update EIR indicates that forecast development would not result in increased risk of or exposure to liquefaction or other seismic-related ground failures. Each future development project would be required to comply with the recommendations in the geotechnical investigation report and comply with the CBC. The General Plan Update EIR found impacts would be less than significant.

Projects, including those subject to the AHPO, will need to comply with CBC regulations. Development under the AHPO would not exacerbate existing liquefaction potential. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Seismically Induced Landslides

The propensity for earthquake-induced landslides is greatest in hilly areas, with steep slopes and bedrock or soils that are prone to mass movement. Very few areas of the County have been mapped by the State as zones of seismically induced landslide hazards under the Seismic Hazard Zonation Program. Furthermore, several policies included in the Conservation and Natural Resources and Safety Elements of the General Plan Update have been developed to address potential seismic-related hazards such as ground shaking, liquefaction, and seismically induced landslides. Compliance with existing state and county regulations, as well as goals and policies included as part of the General Plan Update would ensure that the impacts associated with exposure to strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides are reduced to a less than significant level. The General Plan Update EIR found impacts would be less than significant.

Development under the AHPO would not exacerbate existing landslide conditions; existing CBC requirements to investigate and address soil conditions would ensure that projects do not exacerbate risk. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (b) Result in substantial soil erosion or the loss of topsoil?
- (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?
- (d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial risks to life or property?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that forecast development would result in substantial soil erosion, the loss of topsoil, or development atop unstable geologic units or soils, or expansive soils.

Erosion

Buildout of the General Plan Update would involve construction-related ground disturbance in various parts of Los Angeles County. During future development, soil would be graded and excavated, exposed, moved, and stockpiled. Construction and site grading of future development projects pursuant to the General Plan Update could cause substantial soil erosion without effective soil-erosion measures. Adherence to the requirements of the County Code and the CBC, together with the safeguards afforded by the County’s building plan check and development review process, would help ensure that appropriate erosion controls are devised and implemented during construction. Furthermore, construction activities on project sites larger than one acre would be subject to National Pollution Discharge Elimination System (NPDES) requirements. Required erosion control measures may include temporary and/or permanent erosion control measures such as desilting basins, check dams, riprap or other devices or methods, as approved by the County. The General Plan Update EIR found impacts would be less than significant.

AHPO projects would be required to comply with CBC regulations and the County’s development review process, which would ensure appropriate erosion controls are devised and implemented during project construction. Applicable AHPO projects would also have to comply with NPDES requirements as

appropriate. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Unstable Geologic Units or Soils and Expansive Soils

Buildout of the General Plan Update would increase numbers of residents, workers, and structures in Los Angeles County. The County is geographically expansive, embracing a variety of geologic settings and soil types. Areas of unstable geologic units or unstable or expansive soils are known to occur locally. Development considered for approval under the General Plan Update could expose structures or persons to potentially significant hazards due to unstable geologic units or soils. Compliance with existing state and county regulations, as well as the goals and policies included as part of the General Plan Update would ensure that the impacts associated with erosion and topsoil loss, as well as development atop unstable geologic units and soil, or expansive soil are minimized to the maximum extent practicable. The General Plan Update EIR found impacts would be less than significant.

Development under the AHPO has the potential to expose structures or persons to hazards due to unstable geologic units or soils, particularly when replacement units are constructed off-site. However, compliance with existing state and county regulations, as well as relevant General Plan Update goals and policies, would ensure that no new or greater impacts would occur. Development under the AHPO would not exacerbate existing soil conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that soil conditions would adequately support proposed septic tanks. Most new development that is anticipated in the County would not require the use of septic tanks or alternative wastewater disposal systems. In those few cases where septic systems might be necessary, such as rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, the prevailing soil conditions in Los Angeles County are generally amenable to the use to such systems. In addition, all on-site wastewater treatment systems (OWTS) will be required to comply with County Code, Titles 11 and 28 and other regulations applicable to OWTS, including requirements for preparation and submittal of

feasibility reports in order to obtain the Department of Public Health - Environmental Health approval for construction and installation of OWTS. As such, there would be no impact from implementation of the General Plan Update at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. The General Plan Update EIR found impacts would be less than significant.

The AHPO does not increase development beyond what is already anticipated under buildout of the General Plan Update. It is more likely that septic systems would be necessary in rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, where soil conditions are able to accommodate such systems. Projects subject to the AHPO will still be required to comply with regulations applicable to OWTS. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.7 GREENHOUSE GAS EMISSIONS

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to generating GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that buildout of the General Plan would generate greenhouse gas (GHG) emissions that would have a significant impact on the environment. The General Plan Update would contribute to global climate change through direct and indirect emissions of GHG from land uses within the unincorporated areas. Impacts from GHG emissions within the unincorporated areas would be significant for long-term growth anticipated under the General Plan Update. **Mitigation Measure GHG-1** (GHG emissions inventory and reduction goals) as well as the Community Climate Action Plan (CCAP) would reduce impacts from buildout of the General Plan Update. However, additional statewide measures would be necessary to reduce GHG emissions under the General Plan Update to meet the long-term GHG reduction goals. Since no additional statewide measures are available, the General Plan Update EIR found impacts would be significant and unavoidable.

Implementation of the AHPO would not increase cumulative GHG emissions beyond what has been evaluated within the General Plan Update EIR. Furthermore, the County’s Community Climate Action Plan (CCAP), which was adopted as part of the General Plan Air Quality Element, described Los Angeles

County’s plan to reduce GHG emissions in the unincorporated areas of the County by at least 11% below 2010 levels by the year 2020. The CCAP contains policies and implementing ordinances intended to promote energy efficiency and reduce the urban heat island effect.

Replacement units constructed under the AHPO either on- or off-site would support the CCAP by being energy efficient and compliant with Los Angeles County’s Green Building regulations in Title 31 and the California Green Building Code (CALGreen), which reference provisions for energy efficiency measures.

Since the release of the General Plan Update, the state has passed Senate Bill 32 (SB 32), which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. However, similar to the General Plan Update, even with the implementation of **Mitigation Measure GHG-1** and CCAP measures, additional statewide measure are necessary to reduce GHG emissions to meet the long-term GHG reduction goals. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that the General Plan Update is consistent with the statewide GHG reduction policies. Local actions identified in the General Plan Update include incorporating a multi-model transportation system into the Mobility Element and ensuring that the Land Use Policy Map for the unincorporated areas connects the transportation to land uses. Mobility management is an important component of a multi-modal transportation and a strategy for improving congestion and reducing VMT. Strategies include infrastructure to support liquid natural gas (LNG), compressed natural gas (CNG), and hydrogen vehicles; Intelligent Transportation Systems (ITS); and electric car plug-in ports. In addition, the County’s transportation demand management (TDM) policies include strategies that encourage changes travel behavior and discourage single occupant drivers. TDM policies include congestion management pricing, offering employer-based transit passes or increasing transit availability; regional carpooling programs; and parking management.

To achieve the local goals identified in CARB’s 2008 Scoping Plan, the General Plan Update included the CCAP which identifies and evaluates feasible and effective policies to reduce GHG emissions. Implementation of the CCAP would be necessary to ensure that the local GHG reduction goals for the County under AB 32 would be met. Adoption and implementation of the CCAP in its entirety would reduce GHG emissions to less than significant levels. However, in the absence of an adopted CCAP, consistency with plans adopted for the purpose of reducing GHG emissions toward the short-term target of AB 32 could be significant. The General Plan Update EIR found impacts would be significant and unavoidable.

The AHPO would maintain the County’s existing affordable housing stock by requiring one-for-one replacement of any units demolished or vacated as part of a project. Projects developed under the AHPO would be consistent with the statewide GHG reduction policies evaluated within the General Plan Update. Since the adoption of the General Plan Update in 2015, the state has passed SB 32, which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. The General Plan Update determined that the CCAP was necessary to meet local goals within the 2008 CARB Scoping Plan to meet AB 32. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.8 HAZARDS AND HAZARDOUS MATERIALS

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- (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?**
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that land uses in the County typically involve the use, storage, disposal and transportation of hazardous materials, such as fuels, lubricants, solvents and degreasers, and paints. The General Plan Update EIR indicates that the transportation of hazardous materials/waste may increase as a direct result of increased hazardous materials/waste usage within Los Angeles County. An increase in hazardous materials usage and transport could result in adverse environmental effects.

Numerous federal, state, and local regulations exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. Implementation of the General Plan Update would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses would be required to comply with applicable federal, state, and local regulations related to hazardous materials. The General Plan Update EIR found impacts would be less than significant.

The AHPO requires replacement of lost affordable units on a one-for-one basis. Much of the County’s affordable housing stock is older and therefore could contain hazardous materials such as asbestos or lead paint. Handling of hazardous materials in the course of construction would be regulated by existing Health & Safety Code and Fire Code requirements. In some cases, a project level environmental assessment would determine the potential for impacts as well as any required mitigation.

Further, affordable housing units demolished and constructed under the AHPO do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the AHPO would not involve the substantial transport, use, and disposal of hazardous materials. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to being located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment. ?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that numerous sites within the County are listed on hazardous materials databases compiled pursuant to Government Code § 65962.5. Some of the sites are listed as closed, indicating that they have been investigated and/or remediated to the satisfaction of the lead responsible agency (e.g. RWQCB, DTSC, ACDEH, ACWD) based on land use at the time of closure. The General Plan Update would facilitate new development, including residential, mix-use, commercial, parks, and recreational open spaces, within Los Angeles County. Some of the new development could occur on properties that are likely contaminated. However, Federal and state regulations exist that prevent or reduce hazards to the public and environment from existing hazardous materials sites. In addition, the General Plan Update includes several policies within the Land Use Element that would reduce the potential for the

public and the environment to be exposed to hazardous materials from existing site contamination. Compliance with applicable existing regulations and processes would ensure that the General Plan Update would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites. The General Plan Update EIR found impacts would be less than significant.

Some AHPO projects could occur on properties that may be contaminated. However, federal and state regulations as well as policies within the Land Use Element of the General Plan would reduce the potential for the public and the environmental to be exposed to hazardous materials from existing site conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (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 result in a safety hazard for people residing or working in the County?**
- (f) For a project in the vicinity of a private airstrip, result in a safety hazard for people residing or working in the County?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that federal and state regulations exist that prevent hazards to the public and environment near public airports. These include FAA regulations, which establish safety standards for civil aviation, and the State Aeronautics Act, which establishes air safety standards. In addition, the County requires that development projects near public airports comply with any applicable Airport Land Use Compatibility Plan. Implementation of the General Plan Update may result in land use designations that allow development within two miles of a public airport, private airstrip, or heliport. However, existing FAA regulations, County policies and regulations, and General Plan Update goals and policies are intended to identify and properly address potential airport hazards prior to implementation of specific projects within the County. The General Plan Update EIR found impacts would be less than significant.

AHPO projects could be constructed within two miles of a public airport, private airstrip, or heliport. However, all projects would be subject to existing FAA regulations, County policies and regulations, and General Plan Update goals and policies intended to address potential airport hazards to specific projects.

Furthermore, the AHPO by itself would not increase the number of units that are allowed to be built since it only requires the replacement of affordable units on a one-for-one basis. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(g) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that continued growth and development in Los Angeles County will significantly affect the Los Angeles County Fire Department (LACoFD) and Los Angeles County Sheriff’s Department (LASD) operations. Coordination among various County departments is necessary to ensure adequate emergency response. Collaboration can also ensure that development occurs at a rate that keeps pace with service needs. In addition, several proposed policies of the Safety Element of the General Plan have been developed to address this potential hazard. The General Plan Update EIR found that compliance with applicable regulations and implementation of the General Plan Update goals and policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan is less than significant.

Disaster routes mapped in the General Plan Safety Element are freeways and highways. Therefore, it is unlikely that a project would be approved that blocks access to the public right of way .New development generally would not occur as a result of the AHPO. Projects subject to the AHPO would be required to implement applicable regulations as well as General Plan Update goals and policies to reduce the risk of impaired implementation or physical interference of an adopted emergency response plan or emergency evacuation plan. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(h) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to the urbanized areas or where residences are intermixed with wildlands?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that portions of the County are within moderate, high, and very high fire hazard zones and could expose structures and/or residences to fire danger. Although fires are a natural part of the wildland ecosystem, development in wildland areas increases the danger of wildfires to residents, property, and the environment. Although multiple regulations are in place to ensure that adequate infrastructure, such as peak load water supplies and necessary disaster routes are incorporated into new developments, older communities with aging and substandard infrastructure may face greater risks from wildland fires. The General Plan Update EIR concludes that policies and conditions of approval for future development projects within the County, in addition to compliance with applicable regulations, will minimize impacts related to wildland fires. The General Plan Update EIR found impacts would be less than significant.

Los Angeles County's VHFHSZs are mostly forest areas, such as the Angeles National Forest and Los Padres National Forest. These forest areas are zoned for watershed, open space, agriculture, and a limited amount of low-density residential and rural commercial development. The replacement requirements of the AHPO do not apply within VHFHSZs, a designation that applies to areas where residences are intermixed with wildlands. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.9 HYDROLOGY AND WATER QUALITY

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the County. The following analysis recaps the General Plan Update EIR for informational purposes,

but potential impacts of the environment on a project are no longer considered potentially significant per the CBIA v BAAQMD decision.

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the violation of any water quality standards or waste discharge requirements?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that implementation of the General Plan Update would comply with water quality standards and waste discharge requirements and would not substantially degrade water quality. Construction projects of one acre or more in area in each of the three Water Board regions (Los Angeles, Lahontan, and Central Valley) would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2012. Projects obtain coverage by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. The General Plan Update EIR found impacts would be less than significant upon compliance with regulatory requirements and General Plan Update policies.

AHPO projects would be required to develop and implement a SWPPP and BMPs to minimize pollution of runoff. As such, impacts would remain less than significant upon compliance with regulatory requirements and General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that development pursuant to the General Plan Update would interfere with groundwater recharge. Developments in the unincorporated areas of Planning Areas would be mostly limited to redevelopments and reuses of currently developed areas. Thus, redevelopments in those Planning Areas would result in relatively minor increases in impervious areas. Consequent impacts on groundwater recharge would be minimal. The General Plan Update EIR found impacts would be less than significant.

The AHPO requires replacement of lost affordable housing units. It is anticipated that most replacement units would be built within the envelope of the project that would occur regardless of the AHPO. To the extent that replacement units are located off-site they are subject to certain locational requirements that make it most likely that these units would occur in existing urban areas. Therefore, it is unlikely there would be a substantial increase in impervious surface as a result of the AHPO. Any increase in impervious surface as a result of the off-site units constructed as a result of the AHPO would be within the increases analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded the General Plan Update would not substantially alter drainage patterns in Los Angeles County and would not result in substantial erosion or siltation. Under the MS4 Permit certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. These requirements would ensure that there would not be a substantial change in drainage patterns in the Los Angeles Water Board Region, Lahontan Water Board Region, and Central Valley Water Board Region. The General Plan Update EIR found impacts would be less than significant.

Similar to the General Plan Update, AHPO projects would be required to mimic predevelopment hydrology, evapotranspiration, and rainfall harvest as required by the MS4 permit. As a result, the AHPO would not create a substantial change in drainage patterns to the Los Angeles Water Board Region, Lahontan Water Board Region, or the Central Valley Water Board Region. The AHPO would not

substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that forecast development would not change drainage patterns in Los Angeles County or in parts of adjoining counties in watersheds extending from Los Angeles County into those counties. Under the MS4 Permits in the Los Angeles and Central Valley Water Board regions, certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Projects within the Los Angeles Regional Water Quality Control Board (LARWQCB) Region and subject to low impact development (LID) requirements are required must limit post-development peak stormwater runoff discharge rates to no greater than the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion. Developments pursuant to the General Plan Update would not substantially increase runoff rates or volumes and substantial consequent flood hazards would not occur. The General Plan Update EIR found impacts would be less than significant.

AHPO projects would be constructed within the Los Angeles and Central Valley Water Board Regions. The MS4 permits in these areas will require the projects to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Any grading or paving would need to comply with LID and NPDES requirements to receive construction permits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the following:

(e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

(f) Otherwise substantially degrade water quality?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found impacts related to stormwater drainage and polluted runoff to be less than significant as a result of required compliance with existing regulations (including requirements for Stormwater Pollution Prevention Plans – SWPPP, MS4 and other requirements applicable to the Los Angeles and Lahontan regions).

The AHPO would not substantially increase units or developed area and would not be expected to substantially contribute to polluted runoff. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the following:

(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that forecast housing development could occur within 100-year flood hazard areas. However, development within 100-year flood zones would require improvements to flood control facilities, and issuance of Letters of Map Revision by the Federal Emergency Management Agency (FEMA) showing changes to 100-year flood zones reflecting such improvements; or that the floor beams of the lowest floor of the structure are raised above the 100-year flood elevation. Flood insurance available through the National Flood Insurance Program (NFIP) would also be required. Therefore, buildout of the General Plan Update would not place substantial numbers of people or structures at risk of flooding in 100-year flood zones, and impacts would be less than significant.

If a project is subject to the AHPO is constructed within these flood zones, they would also be required to improve flood control facilities and issuance of Letters of Map Revision by FEMA to demonstrate improvement; or construct floor beams raised above the 100-year flood elevations. Additionally, these projects would be required to comply with the County’s municipal code for building with flood-prone areas. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(i) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that dam inundation areas span some unincorporated areas of all the County except the South Bay Planning Area; and parts of the Antelope – Fremont Valleys, Santa Clara, San Gabriel River, Santa Monica Bay, Los Angeles River, and San Pedro Channel Islands watersheds. Considering the relatively small proportional net increases in numbers of residents and workers that would be put at potential risk from dam inundation; the operation of most of the dams as flood control dams, not impounding large reservoirs most of the time; and safety requirements and inspections by the Division of Safety of Dams, the General Plan Update EIR found that impacts would be less than significant.

It is possible that AHPO projects could occur within dam inundation zones. However, as noted in the General Plan Update EIR, there is a relatively small proportional net increase in numbers of residents and workers that would be put in potential risk. Moreover, most of the dams are flood control dams subject to the safety requirements and inspections by the Division of Safety of Dams. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(j) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to inundation by seiche, tsunami, or mudflow?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As analyzed in the General Plan Update EIR, parts of the County are subject to inundation by seiche, tsunami, or mudflow. Buildout of the General Plan Update would not subject substantially increased numbers of people or structures to tsunami flood hazards. Therefore, buildout of the General Plan Update would not subject substantially increased numbers of people or structures to tsunami flood hazards. Impacts would be less than significant.

Geotechnical investigations would be required for the development of structures for human occupancy pursuant to the General Plan Update. Where such geotechnical investigations identified mudflow hazard areas in or next to the sites of proposed structures or other improvements, the geotechnical investigations would include recommendations for minimizing such hazards. Compliance with recommendations of geotechnical investigations is required under the County Grading Code, Title 26, Appendix J of the County Code. Impacts would be less than significant after compliance with recommendations in geotechnical investigations.

The presence of a potential landslide hazard will be determined at the project level. The only unincorporated area in a tsunami hazard zone is Marina del Rey, which is already built-out with high-density housing and is subject to the Marina del Rey Local Coastal Program, which contains analysis and policies governing assessment of tsunami and seiche risk. Further, Marina del Rey would not be subject to the AHPO as it has a Specific Plan with an affordable housing requirement and mobilehome parks are not a permitted use. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.10 LAND USE AND PLANNING

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the potential to physically divide an existing community?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update identifies proposed and planned roadways in Los Angeles County. At a programmatic level, the General Plan Update does not allow land uses patterns that would result in division of an established neighborhood or community. Although policy maps included in the Land Use and Mobility Elements of the General Plan identify locations for Transit Oriented Districts, highways, and transit projects, these changes and improvements are not anticipated to divide established neighborhoods. Impacts would be less than significant.

The AHPO requires one-for-one replacement of any lost affordable housing units. Projects subject to the AHPO are anticipated to be generally consistent with the existing zoning and the allowable densities specified in the General Plan Land Use Element and DBO; any proposed zone change would require discretionary action. Any projects that are not consistent with zoning or the General Plan land use designation (and therefore with the potential to disrupt an existing neighborhood) would be subject to the County process for zone changes or General Plan amendments. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that the General Plan Update would not conflict with goals contained within SCAG’s 2012–2035 RTP/SCS or other land use plans. Therefore, impacts related to compatibility between the General Plan Update and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant.

Projects developed under the AHPO would be subject to environmental review for consistency with local land use plans, goals, and policies, some of which may call for more affordable housing. The AHPO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by maintaining the existing supply of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable habitat conservation plan or natural community conservation plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that the General Plan Update would not conflict with adopted habitat conservation plans. Although buildout of the General Plan Update would include development and redevelopment in areas covered by conservations plans, such development would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.

As described in **Section 3.4 Biological Resources** any AHPO project developed in an area covered by conservation plans would be required to comply with provisions of those plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.11 MINERAL RESOURCES

- (a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that implementation of the General Plan Update would cause the loss of availability of a known mineral resource in the Antelope Valley Planning Area but not in the other 10 Planning Areas. No mitigation measures are available that would reduce impacts of buildout from the General Plan to less than significant. The General Plan Update EIR found that mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. The General Plan Update EIR found that compensatory mitigation outside of the region was infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate. The General Plan Update EIR found impacts to be significant and unavoidable.

Buildout of the General Plan Update would not substantially reduce the regional availability of oil and natural gas, and it would not render any large oil fields completely inaccessible. Furthermore, development of residential, commercial, and other urban uses does not preclude the continued use of nearby oil wells. Therefore, the geographic scope of areas available for the extraction of oil and natural gas are not expected to be dramatically reduced by implementation of the General Plan Update. The General Plan Update EIR found impacts to oil and gas to be less than significant.

The AHPO would not substantially reduce the regional availability of oil and natural gas. While AHPO projects could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the AHPO are currently in use as mineral extraction. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the General Plan Update would cause a substantial loss of availability of mineral resources in one mineral extraction area: the Little Rock Wash area in the Antelope Valley Planning Area. The General Plan Update EIR found no mitigation measures that would reduce impacts of buildout from the General Plan Update to less than significant. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate. The General Plan Update EIR found impacts to be significant and unavoidable.

The AHPO would not affect mineral resource zones or otherwise result in the loss of locally important mineral resources. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.12 NOISE AND VIBRATION

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that anticipated development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment. It also found that construction activities such as the transport of workers and movement of

materials to/from work sites could incrementally increase noise levels along local access roads. Furthermore, the General Plan Update EIR found that demolition, site preparation, grading, and/or physical construction would result in temporary increases in the ambient noise environment in the vicinity of each individual project. Implementation of policies within the General Plan Update would reduce traffic noise impacts to existing noise sensitive uses to the extent feasible. However, no additional feasible mitigation measures are available to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within Los Angeles County that would be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site traffic noise impacts to existing uses (such as through the construction of sound walls and/or berms) may often be out of proportion with the level of impact. The General Plan Update EIR found impacts to be significant and unavoidable.

AHPO projects could generate some construction noise and could expose residents to sources of noise. However, construction activities are subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. The AHPO could lead to an incremental increase in the size of a project. However, this incremental increase would not generate significant amounts of noise compared to other types of uses. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Traffic associated with development under the AHPO would be within the assumptions made and analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that development could create elevated levels of groundborne vibration and groundborne noise; both in the short-term (construction) and the long-term (operations).

Vibration impacts may occur from construction equipment associated with development in accordance with the General Plan Update. **Mitigation Measure N-3** (train-related vibration), would reduce potential train-related vibration impacts to new uses below the thresholds (i.e., below 0.08 RMS in/sec for residential uses). **Mitigation Measure N-4** (construction-related vibration) would reduce vibration impacts associated with construction activities to the extent feasible. **Mitigation Measure N-5** (industrial-related vibration) would reduce potential vibration impacts from industrial uses to less-than-significant levels. The General Plan Update EIR found that due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts would be significant and unavoidable.

The AHPO is not anticipated to result in significant generation of groundborne vibration or groundborne noise levels in excess of County standards. AHPO projects are primarily expected to be located in zones that allow housing. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not induce the development of industrial land uses typical of excessive groundborne vibration or groundborne noise levels. However, construction of AHPO projects could result in short-term ground-borne vibration or groundborne noise levels and would be required to implement **Mitigation Measure N-4**, consistent with the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that forecast development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment. New noise-sensitive land uses associated with the General Plan Update could be exposed to elevated noise levels from mobile sources along roadways. Implementation of the noise-related policies contained within the General Plan Update in addition to **Mitigation Measure N-2**, which includes an acoustic analysis to develop design recommendations, would reduce exterior noise compatibility impacts. While interior noise levels are required to achieve the 45 dBA CNEL interior noise limit of Title 24 and Title 25, exterior noise levels may still exceed the County noise land use compatibility criteria, despite exterior

noise attenuation (i.e., walls and/or berms). The General Plan Update EIR found impacts related to exterior noise compatibility due to increased traffic noise to be significant and unavoidable.

AHPO projects would generate traffic that could incrementally contribute to elevated noise levels from mobile sources along roadways. To the extent that projects exacerbate impacts such impacts would be considered significant. However, most projects would result in a less than significant contribution to traffic and therefore noise. Projects would be required to implement **Mitigation Measure N-2** and are required to achieve interior noise limits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that construction activities associated with any individual development may occur near noise-sensitive receptors and, depending on the project type noise, disturbances may occur for prolonged periods of time. **Mitigation Measure N-1**, which requires installation of temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing non-essential idling of construction equipment to no more than five minutes, would reduce impacts associated with construction activities to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts construction noise would be significant and unavoidable.

AHPO projects could generate elevated noise levels from construction activities in some locations. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Projects would be subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not induce the development of industrial land uses, which tend to generate the most significant noise impacts. Additionally, the projects would be required to implement the General Plan’s **Mitigation Measure N-1**, which would reduce impacts associated with construction activities to the extent feasible. Existing noise levels on sites where projects are most likely to occur is anticipated to be generally urban and in

proximity to transit. Noise impacts would be temporary and typical for construction activity, which is allowable in urban areas and therefore reasonably anticipated to occur. In addition, all stationary equipment (primarily anticipated to be HVAC equipment) would be required to comply with county regulations to ensure noise levels do not exceed ambient noise level standards. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?**
- (f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR explains that development is required to be consistent with any applicable Airport Land Use Compatibility Plan (ALUCP) constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that development would not conflict with airport land use plans. Therefore, future development under the General Plan Update would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels (and would not exacerbate existing impacts).

AHPO projects would be required to comply with policies included in the Land Use Element and Noise Element of the General Plan to ensure that development would not conflict with airport land use plans. The AHPO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.13 POPULATION AND HOUSING

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to induce substantial 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)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that the General Plan Update would directly result in population growth in the County. According to the General Plan Update EIR, estimated buildout population of Los Angeles County is 2,356,890 residents, which is expected to occur sometime after 2035. The mixture of land uses and densities anticipated for General Plan Update buildout can accommodate the growth projected by SCAG for 2035. The General Plan accommodates up to 659,409 housing units, and although buildout is not expected to occur by 2035, the opportunities for housing development provided in the General Plan Update are consistent with SCAG growth projections for 405,500 units by 2035. The housing and population growth allowed under the General Plan Update is consistent with SCAG projections and do not constitute a significant adverse environmental impact.

Under the General Plan Update, the Antelope Valley Planning Area goes from an existing jobs-housing ratio of 1.29 to 0.18 at buildout, which is very housing-rich. This would be considered a significant impact without mitigation. **Mitigation Measure PH-1**, which requires the County to identify land use changes to achieve a minimum jobs-housing ratio of 1.30 for the Antelope Valley Planning Area, would reduce potential impacts to population and housing to a level that is less than significant.

The AHPO requires replacement of lost affordable housing units. The AHPO is not anticipated to result in a substantial increase in population as it aims to maintain the existing affordable housing stock in the County. The effects of the AHPO on population growth would be minimal and well within the assumptions of the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that existing uses would continue even where new zoning and land use designations are proposed. None of the existing uses would be forced to be removed or relocated as a result of the project implementation. Compliance with the Housing Element would facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate the RHNA and maintain an inventory of housing opportunities sites. Therefore, the General Plan Update EIR found no significant impacts.

The AHPO requires replacement of lost affordable housing units. The purpose of the AHPO is to preserve the existing affordable housing stock in Los Angeles County. As described in the Project Description, the AHPO would work with other housing related ordinances under consideration (Inclusionary Housing, Density Bonus, Interim and Supportive, By Right Housing) to ensure that new residential projects set aside a percentage of units for affordable housing. The AHPO would not result in displacement of existing housing as it does not incentivize development. Rather, it seeks to alleviate the loss of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.14 PUBLIC SERVICES

- (a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 following public services :
- Fire protection and emergency response
 - Police Protection
 - Schools
 - Parks
 - Other Public Facilities

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Fire Protection and Emergency Response

The General Plan Update EIR concludes that buildout of the General Plan Update would introduce new structures, residents, and employees into the LACoFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel. To maintain or achieve acceptable travel time standards for fire protection, it is reasonably foreseeable that the provision of new or physically altered fire facilities would be required, which would have the potential to result in adverse environmental impacts. The General Plan Update EIR found that **Mitigation Measures PS-1, PS-2, and PS-3** would reduce potential impacts associated with fire protection. **Mitigation Measure PS-1** would require developers to pay developer fees to the LACoFD. **Mitigation Measure PS-2**, would ensure that each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. **Mitigation Measure PS-3** would require that a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area. These mitigation measures would reduce impacts to a less than significant level.

The replacement requirements of the AHPO do not apply within VHFHSZs. AHPO projects are generally anticipated to occur in urbanized areas zoned for residential uses. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by fire protection services. The AHPO does not increase development beyond what is already anticipated under buildout of the General Plan Update. Therefore, consistent with the General Plan Update EIR, implementation of **Mitigation Measures PS-1, PS-2, and PS-3** would reduce

any potential impacts associated with projects subject to the AHPO. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Law Enforcement

The General Plan Update EIR found that development would introduce new structures, residents, and employees into the LASD service boundaries, thereby increasing the requirement for law enforcement facilities and personnel. The majority of new development pursuant to the General Plan Update would occur in the Santa Clarita Valley and Antelope Valley Planning Areas. A mitigation fee has been adopted for the Santa Clarita Valley but at the time of the General Plan Update EIR, no mitigation fee had been adopted for the Antelope Valley Planning Area. The General Plan Update EIR found that **Mitigation Measure PS-4**, which requires that the County identify an implementation program to ensure adequate funding is available to provide law enforcement services within the Antelope Valley Planning Area, would reduce potential impacts associated with law enforcement to a less than significant level.

Similar to fire services, the projects subject to the AHPO are not expected to increase population, but rather to preserve the stock of affordable housing in the County. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by law enforcement. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

School Services

The General Plan Update EIR found that development would generate new students who would impact the school enrollment capacities of area schools. However, under state law, development projects are required to pay established school impact fees at the time of building permit issuance. The fees authorized for collection are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the increase in the demand for school facilities and services due to implementation of the General Plan Update would be adequately mitigated by the payment of associated fees. Impacts are less than significant.

The AHPO requires one-for-one replacement of any affordable housing units that are lost due to demolition or vacation as part of a project. The AHPO would not increase the overall population growth beyond what is anticipated in the General Plan Update EIR, nor would the ordinance substantially change the location of planned development. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by schools. Therefore, it is unlikely that additional schools would need to be constructed as a result of the

AHPO. Projects subject to the AHPO would be required to pay established impact fees at the time of building permit issuance, which would adequately mitigate any impacts generated to school service. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Library Services

The General Plan Update EIR found that the General Plan Update would generate additional population, increasing the service needs for the local libraries. According to County Library staff, increased tax revenues funding addresses only library operations, and because of uncertainty regarding General Fund contribution levels, it is not adequate to offset the impact of the project on the County Library's ability to construct new libraries and purchase new items (books, periodicals, audio cassettes, videos, etc.). Consequently, the tax revenues collected would not adequately cover all the costs of serving the project population. In order to minimize potentially adverse effects, the County devised library facilities mitigation fee programs, and future residential projects would be required to remit payment pursuant to the County-wide program to account for library-related construction and acquisition costs. The General Plan Update EIR found that requiring payment of the library facilities fee in effect at the time development occurs would mitigate impacts to a less than significant level.

Similar to school services, AHPO projects are not expected to increase population, but rather to preserve the stock of affordable housing in the County. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by libraries. Therefore, it is unlikely that additional libraries would need to be constructed as a result of the AHPO. Regardless, consistent with the General Plan Update, projects subject to the AHPO would be required to pay the County's established library facility fee at the time of building permit issuance, which would adequately mitigate any impacts generated to libraries. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.15 RECREATION

- (a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that forecast development would generate additional residents that would increase the use of existing parks and recreational facilities but not to such an extent that substantial physical deterioration may occur or be accelerated.

According to the General Plan Parks and Recreation Element, all 11 Planning Areas face a deficit in local parkland totaling over 3,719 acres, and eight of the 11 Planning Areas have deficits in regional parkland. In 2016 the Department of Parks and Recreation completed the Countywide Parks and Recreation Needs Assessment which inventoried existing parks and recreational facilities in 188 study areas (including cities and unincorporated areas), quantified the need for additional park resources, and estimated the potential cost of meeting that need. Funding from a parcel tax approved in 2016 (Measure A) will be allocated locally by the Los Angeles County Regional Park and open Space District according to the population, square footage of improvement on parcels of land, and park need of each study area. Further, the General Plan Update EIR found that policies and programs would assure that funding for parkland acquisition would be proportional to increases in population and that impacts would be less than significant.

The AHPO would not induce population growth within the County; rather it would serve the forecast population by maintaining the number of units in the housing stock that are affordable. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by parks and recreation facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to including recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan EIR indicates that the anticipated increase in population would require the construction and expansion of new recreational facilities to serve the forecasted population growth in the unincorporated areas. Although the General Plan Update does not specifically site or plan recreational facilities, it would allow for the development of future recreational facilities, including parks, trails, athletic fields, and golf courses, within many of the land use designations, including residential and mixed-use.

Goals, policies, and actions in the General Plan Update including the creation of a County Parks and Recreation Master Plan, a trails program, and Parks Sustainability Program would guide the development of future recreational facilities. Existing federal, state, and local regulations would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails pursuant to buildout of the General Plan Update. Furthermore, subsequent environmental review would be required for development of park projects under existing regulations. Consequently, the General Plan Update EIR determined impacts would be less than significant.

As discussed above, the AHPO would not induce population growth and would preserve the affordable housing stock for the County. Projects subject to the AHPO would comply with existing federal, state, and local regulations regarding parks and recreational facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.16 TRANSPORTATION AND TRAFFIC

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- (b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that buildout of the General Plan Update would impact levels of service on the existing roadway system. **Mitigation Measures T-1** through **T-5** would reduce these impacts. **Mitigation Measure T-1** would ensure projects are evaluated and traffic improvements identified to maintain minimum levels of service in accordance with the County’s Traffic Impact Analysis Guidelines. **Mitigation Measure T-2** would require the county to implement over time objectives and policies contained within the General Plan Mobility Element. **Mitigation Measure T-3** would require the county to participate on a potential Congestion Mitigation Fee program. **Mitigation T-4** directs the County secure the funding needed to implement the future planned improvements. **Mitigation Measure T-5** directs the County to work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent to unincorporated areas. These mitigation measures would reduce impacts; however, the impacted locations are still considered to be significant. Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County’s control (e.g., the County cannot undertake or require improvements outside of the County’s jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans’ approval). Therefore, the General Plan Update EIR determined impacts would be significant and unavoidable. As further described below, the mitigation measures included in the General Plan EIR would no longer be applicable, as they aim to reduce level of service impacts.

Since certification of the General Plan Update EIR, CEQA has been revised such that delay-based metrics including level of service (and associated mitigation measures) are no longer required. Instead CEQA now

requires that vehicle miles travelled (VMT) be the primary metric for evaluating transportation impacts. As of July 2020, the County of Los Angeles has updated their approach to traffic analyses and CEQA documentation to require consideration of VMT. The County’s new transportation impact analysis requirements apply to environmental documents released for public review after July 1, 2020. Land use development projects will be analyzed on a project by project basis to determine if they comply with County transportation impact analysis guidelines.

If a land use development project is required to do a transportation impact analysis and does not achieve the applicable VMT reduction target for residential projects, mitigation options that reduce VMT must be explored.

Under Senate Bill (SB) 743 and the County’s new transportation impact analysis guidelines, projects that further the State’s affordable housing goals are presumed to have a less than significant impact on VMT. The AHPO was drafted to address the County’s affordable housing needs. As such, a presumption of less than significant impact on transportation can be made and no further analysis is required.

AHPO requires replacement of lost affordable housing units and would preserve existing density in legally established mobilehome parks. The AHPO would not substantially change the location that development would occur; any replacement units constructed off-site are subject to locational requirements in the ordinance that are anticipated to result in such development being primarily located in urban areas in proximity to transit. The AHPO would not increase development beyond that evaluated in the General Plan Update EIR. In general, AHPO projects (other than mobilehome parks) are expected to be located in urbanized infill areas. Such areas are often but not exclusively in proximity to transit and/or walkable destinations. With respect to mobilehome parks, the proposed preservation of existing legally established parks that exceed current allowable density, would not increase VMT compared to existing conditions. The AHPO would not substantially change traffic impacts as compared to those that would occur under the General Plan Update; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update is not anticipated to result in the development of a new airport within Los Angeles County nor will it introduce new land uses that could prevent safety hazards to air traffic. Furthermore, policies of the General Plan Update are aimed at improving the compatibility between aviation facilities and their surroundings, encouraging greater multi-modal access to airports, and encouraging the development of a decentralized system of major airports. The General Plan Update EIR found impacts to be less than significant.

While the AHPO does not prohibit projects in the vicinity of an airport or flight path, these projects would be limited in number and therefore unlikely to significantly affect flight paths or air travel. Existing FAA regulations and the ALUCPs and are intended to identify and properly address potential airport hazards prior to implementation of specific projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that there would not be substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The General Plan Update promotes highways to be built to specific standards that have been set by the County. Hazards due to roadway design features will be evaluated on a project-by-project basis. All new highways and upgrades will be planned, designed, and built to County standards. The General Plan Update EIR found impacts to be less than significant.

Development associated with the AHPO is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The AHPO would not result in changes being made to the local roadways or impede public access on any public right-of-way. Therefore, implementation of the AHPO would have no impact related to design feature hazards. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to inadequate emergency access?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that development would not result in inadequate emergency access. For projects of sufficient size, discretionary review of emergency access is evaluated on a project-by-project basis. The General Plan Update EIR found that buildout will enhance the capacity of the roadway system by upgrading roadways and intersections when necessary, ensure that the future dedication and acquisitions of roadways are based on projected demand, and implement the construction of paved crossover points through medians for emergency vehicles. Additionally, the General Plan Update EIR found that the General Plan Update will facilitate the consideration of the needs for emergency access in transportation planning. The County will ensure that new development is provided with adequate emergency and/or secondary access, including two points of ingress and egress for most subdivisions, require visible street name signage, and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. The General Plan Update EIR determined impacts to be less than significant.

The County has designated disaster routes as detailed in the Safety Element of the General Plan. Development, including that in accordance with the AHPO, could temporarily interfere with local and on-site emergency response. While road closures could occur as a result of construction activity, it is not anticipated that such closures would result in substantial delays to service providers.

Any lane closures must be approved by the County and they would not be approved if substantial delays could result. Typically, the County requires a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Compliance with access standards, including the Haul Route Monitoring Program would reduce potential impacts on roadways designated as haul routes and emergency response services during construction of individual projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that the General Plan would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). The General Plan Update supports alternative modes of transportation, including walking and bicycling, to reduce total VMT. Additionally, the General Plan Update establishes several policies to ensure the safety and mobility of pedestrians and bicyclists. The County will provide safe and convenient access to safe transit, bikeways, and walkways, consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems, provide safe pedestrian connections across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations, adopt consistent standards for implementation of Americans with Disabilities Act requirements and in the development review process prioritize direct pedestrian access between building entrances, sidewalks and transit stops. The General Plan Update EIR determined impacts would be less than significant.

Development associated with the AHPO would be consistent with the underlying zoning for the site. Projects would continue to be consistent with General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.17 UTILITIES AND SERVICE SYSTEMS

Wastewater Treatment and Collection

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

According to the General Plan Update EIR, wastewater generation under the General Plan Update would not exceed wastewater treatment requirements of any of the four Regional Water Quality Control Boards having jurisdiction in Los Angeles County. General Plan Update implementation programs require Department of Regional Planning and the Department of Public Works (DPW) to jointly secure sources of funding and to set priorities for preparing studies to assess infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, the County will prepare a Capital Improvement Plan for each of the 11 Planning Areas. Each Capital Improvement Plan shall include a Waste Management Study and Stormwater System Study. General Plan Update policies also require the County to support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan Update encourages development, such as Transit Oriented Districts (TODs). Therefore, the General Plan Update EIR found that polices and required regulations would ensure impacts are less than significant.

Development associated with the AHPO would be well within the expected growth for the unincorporated County evaluated in the General Plan Update EIR and would not exceed RWQCB standards for treatment of wastewater or wastewater treatment capacity. Additionally, water conservation practices and compliance with best management practices (i.e., low flow toilets and automatic sinks), as well as Title 24 requirements, are likely to reduce wastewater generation. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (b) Would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- (c) Would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- (e) Would result in a determination by the wastewater treatment provider which serves or may serve the project that is has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR explains that projects are required to pay connection fees to the LACSD, or corresponding types of fees to the City of Los Angeles Bureau of Sanitation, as applicable. Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Antelope Valley and

Santa Clarita Valley Planning Areas. The General Plan Update EIR determined there is sufficient wastewater treatment capacity in the remaining Planning Areas and impacts would be less than significant.

Wastewater. Development associated with the AHPO would not result in a net gain or loss of housing units; it would replace affordable units that are removed from the housing stock. Such development would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing sewer lines. Development in accordance with the AHPO would be required to comply with all applicable County regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Water. Water would be conveyed to projects along existing circulating water mains of varying sizes. Projects associated with the AHPO are anticipated to be generally located on land already developed with residential uses and served by water systems. The AHPO allows mobilehome parks to preserve their existing density, even if it exceeds the current allowable. Some mobilehome parks are connected to well water systems rather than the municipal system, but since no units would be added, no impacts would occur. Projects would be subject to Los Angeles County's Low Impact Development (LID) requirements, Los Angeles County's drought-tolerant landscaping requirements, and CALGreen construction requirements for low flow fixtures and other water conservation features. Development in accordance with the AHPO would be required to comply with water conservation requirements and ensure that adequate infrastructure exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Stormwater. Development associated with the AHPO would not result in a net gain or loss of housing units; it would simply replace affordable units that are removed from the housing stock. Such development would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing storm drains. Development in accordance with the AHPO would be required to comply with all applicable County regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Water Supply and Distribution System

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

(d) Have sufficient water supplies available to serve the project from existing entitlements and resources, and new and/or expanded entitlements would be needed?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that adequate water supplies have been identified in the UWMP’s for the County for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the General Plan Update, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. It is uncertain whether the water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035. **Mitigation Measures USS-1 through USS-23** would lower these impacts, however the General Plan Update EIR finds that impacts would be significant and unavoidable.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. It is unlikely to result in projects that would not have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources. Developments constructed as a result of the project are likely to be located on land previously developed with residential and served by water systems that would provide will-serve letters verifying water supply. Projects would be subject to LID requirements, drought-tolerant landscaping requirements, and CALGreen construction requirements for low-flow fixtures and water conservation features. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Solid Waste

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

(f) Would be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?

(g) Would not comply with federal, state, and local statutes and regulations related to solid waste?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR finds that generation of solid waste would increase as the population increases with buildout of the General Plan Update. Correspondingly, there would be a need for additional landfill capacity and related support facilities. Both the forecasted net increase in solid waste generation by General Plan Update buildout and the forecast total solid waste generation in unincorporated County areas at General Plan Update buildout are well within the total residual per day daily disposal capacity of the nine landfills analyzed in the General Plan Update EIR. The General Plan Update EIR concludes that buildout would not require construction of new or expanded landfills, and impacts are found to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. It is unlikely to result in projects that would significantly impact landfill capacity. As discussed elsewhere in this Addendum, AHPO projects are primarily anticipated to be located in urban areas already served by existing landfills. Projects that obtain planning and building approvals would be consistent with solid waste regulations and would not be expected to generate substantial amounts of solid waste. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Other Utilities

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

(h) Would increase demand for other public services or utilities?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Electricity

The General Plan Update EIR concludes that growth in the unincorporated areas would result in additional demand for electricity service. Presently and for the foreseeable future, the national and regional supply of electrical energy is not in jeopardy. The acceleration of the approval and licensing process of additional state power plants will ensure an adequate supply of electricity for state consumers. The General Plan Update EIR forecasted the net increase in electricity demand due to buildout is about 9.9 billion kWh per year, or about 10,300 GWh per year, and is within Southern California Edison's (SCE's) demand forecast for its service area. Therefore, the General Plan Update EIR finds impacts to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. Inclusionary housing projects are likely to be located on land previously developed with residential uses and served by existing electrical utilities. Projects would also be subject to Los Angeles County's Green Building Program and CALGreen, which promote energy efficiency. The AHPO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Natural Gas

The General Plan Update EIR indicates that buildout would result in demand about 192 million therms per year, that is, 51 million cubic feet of natural gas per day. Forecasted natural gas demands due to the General Plan Update are within Southern California Gas Company's (SCGC's) estimated supplies; therefore the General Plan Update EIR found impacts on natural gas supplies to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. Inclusionary housing projects are likely to be located on land previously developed with residential or commercial uses and served by existing natural gas utilities. Projects would also be subject to Los Angeles County's Green Building Program and CALGreen, which promote energy efficiency.

The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.18 CUMULATIVE IMPACTS

Cumulative projects are described in the **Chapter 1.0, Introduction, Section 1.7, Background and Planning History**.

Section 15130 of the *Guidelines* requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively significant. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (*Guidelines* § 15355). “‘Cumulatively considerable’ means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (*Guidelines* § 15065(a)(3)).

The purpose of a cumulative analysis is to determine if several projects when evaluated together could result in a significant “cumulative” impact that would otherwise not be considered significant when projects are evaluated one at a time. If several projects considered together have the potential to result in a significant cumulative impact (that is not already identified as a significant project impact), the question becomes whether the project being analyzed would result in a “considerable” contribution to such a significant cumulative impact. Therefore, if a project results in a significant impact by itself, then its contribution to a cumulative impact is considerable. Mitigation measures that reduce project impacts would similarly reduce a project’s contribution to cumulative impacts.

Cumulative impacts occur in one of two ways: 1) impacts from one project overlap with impacts from another project, 2) the other way that cumulative impacts occur is when a resource is of value to a broader community than just the immediate project vicinity, for example, impacts to a cultural or biological resource that has more than local significance, for example state or even national significance, impacts to such a resource would be cumulative with impacts to other resources of similar significance wherever they occur in the state or across the entire US.

The geographic area for evaluation of cumulative impacts is the area within which impacts of the General Plan Update, could overlap with impacts of other projects within the cities of Los Angeles County. The General Plan Update EIR evaluated cumulative projects and determined that during the planning period of the General Plan Update, cities in Los Angeles County are anticipated to grow by approximately 300,000 housing units and 1 million residents compared to existing conditions. This growth is in addition to development anticipated in the General Plan Update for unincorporated areas of the County – for 358,931 housing units and 1,290,479 residents (see **Chapter 2.0**).

The housing ordinances currently being prepared by Los Angeles County would work to facilitate the development analyzed in the General Plan Update EIR, with a focus on increasing housing options and affordability within the County. Although the housing ordinances have some common goals, they are not dependent on one another; each has independent utility.

The ordinances together are expected to result in the development of new housing that would be generally consistent at a County-level with the overall development assumptions analyzed in the General Plan Update EIR. As discussed throughout this addendum, the types of impacts that would generally be expected to occur are those that are common to housing projects, such as construction, and population related effects. The total number of units that are anticipated to be constructed as a result of the five ordinances would be well below the number evaluated in the General Plan Update EIR. The General Plan does not indicate how the projected units would get built, but rather provides the flexibility for the market to dictate how the total number of units would be ultimately constructed. The ordinances together would result in a small subset of the overall growth evaluated in the General Plan Update EIR and the impacts would be a similar subset of the impacts identified within the General Plan Update EIR. As such, even when combined, the ordinances would not result in a cumulatively considerable contribution to the impacts identified in the General Plan EIR, rather they are part of the overall development anticipated in the General Plan Update EIR and would facilitate that development rather than adding to it.

4.0 REFERENCES AND PREPARERS

4.1 REFERENCES

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Los Angeles County, General Plan 2035 Programmatic EIR, Certified October 6, 2015 available at: <http://planning.lacounty.gov/generalplan/eir>

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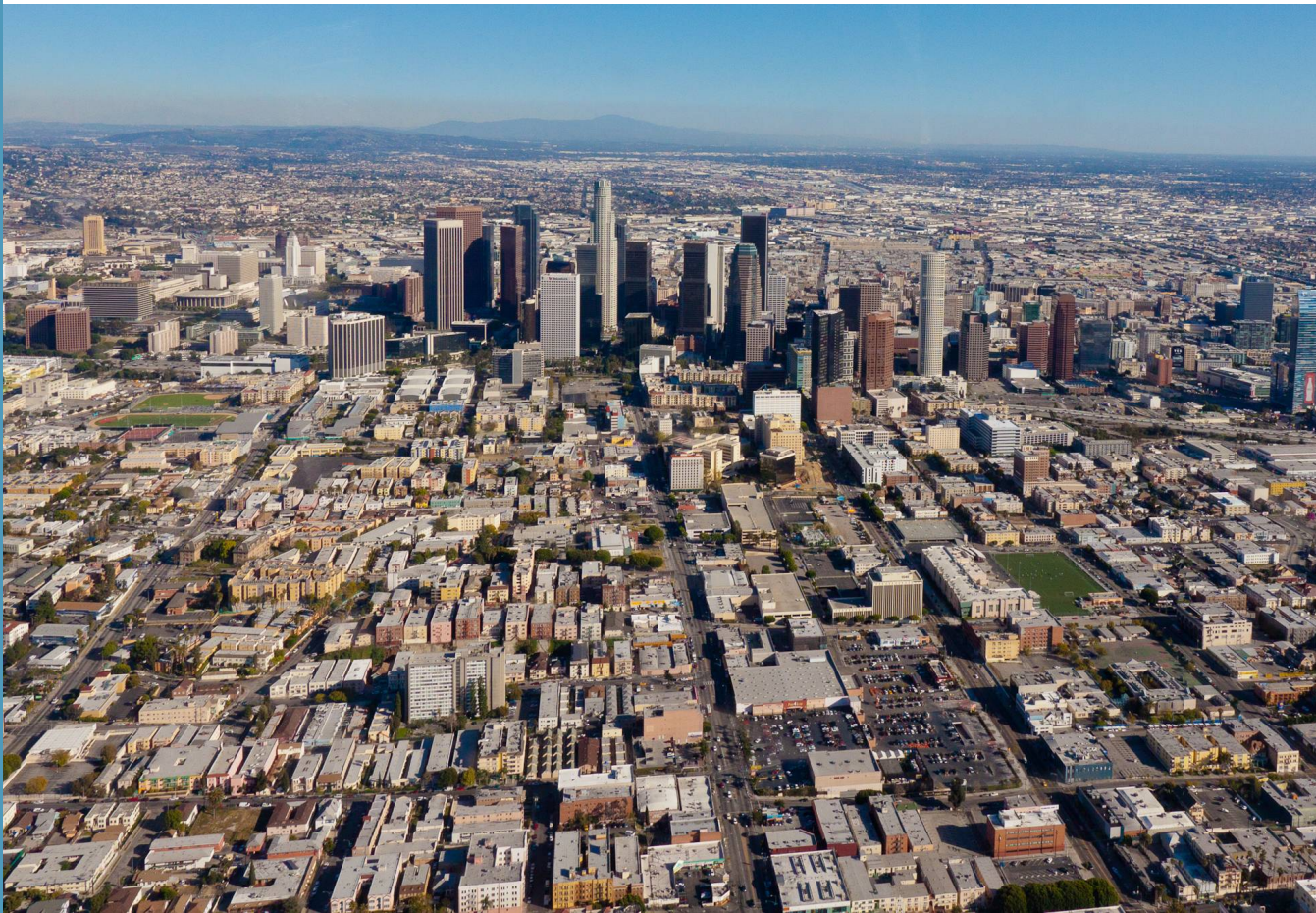
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County of Los Angeles

Affordable Housing Preservation Ordinance Addendum to the Certified Los Angeles County General Plan Update Final Environmental Impact Report



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October 2020

County of Los Angeles
Affordable Housing Preservation Ordinance
Addendum to the Certified Los Angeles County
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1. INTRODUCTION

1.1 OVERVIEW

This Addendum, to the previously certified Los Angeles County General Plan Update Final Environmental Impact Report (State Clearinghouse # 2011081042; hereinafter "General Plan Update EIR"), is prepared in compliance with the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.; hereinafter "CEQA") and the Guidelines for the Implementation of CEQA (Cal. Code Regs., tit. 14, § 15000, et seq.; hereinafter "Guidelines"). The purpose of this Addendum is to assess any environmental impact differences between the proposed Affordable Housing Preservation Ordinance (AHPO), also referred to as the "Proposed Project" or "Project", and the adopted County of Los Angeles General Plan Update, herein referred to as "General Plan Update". More specifically, this Addendum is designed to determine whether and to what extent the General Plan Update EIR is sufficient for addressing the potential environmental impacts and mitigation measures for the Proposed Project.

Based on substantial evidence provided in this Addendum, the General Plan Update EIR and other materials in the record, the County of Los Angeles (County) determines that the Proposed Project falls within the General Plan Update EIR as the AHPO has no new significant environmental impacts; no substantial increase in the severity of previously identified significant effects; no mitigation measures or alternatives previously found infeasible and now feasible; and no mitigation measures or alternatives which are considerably different from those in the General Plan Update EIR. Thus, neither a subsequent nor supplemental environmental impact report (EIR) is required. (Pub. Resources Code, § 21166; Guidelines §§ 15162, 15163.) However, some changes or additions are necessary to the General Plan Update EIR, making this Addendum the appropriate CEQA document for the Proposed Project (Pub. Resources Code, §21166; Guidelines, §§ 15162 – 15164).

The proposed project involves amendments to Title 8 – Consumer Protection, Business and Wage Regulations; Title 21 – Subdivisions; and Title 22 – Planning and Zoning of the Los Angeles County Code. **Chapter 2.0** of this Addendum describes the proposed project in detail.

This Addendum is organized into the following sections:

Chapter 1.0, Introduction. Chapter 1.0 describes the purpose and organization of this document. The introduction includes applicable statutory sections of the Public Resources Code and Guidelines, a brief planning history, and identification of the General Plan Update EIR findings.

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Chapter 2.0, Project Description. Chapter 2.0 describes the Proposed Project, including its characteristics and objectives. Proposed Project characteristics are discussed in the context of the current requirements and the changes to these requirements that would be implemented with the Proposed Project.

Chapter 3.0, Environmental Analysis: Chapter 3.0 provides an environmental analysis of the Proposed Project compared to the General Plan Update. It presents an analysis of the environmental factors identified in Appendix G of the Guidelines, determining for each factor whether the circumstances set forth in Public Resources Code section 21166 and its implementing Guidelines sections 15162 and 15163, governing when preparation of a subsequent EIR or supplemental EIR is required, respectively, are present with respect to the Proposed Project or the situation surrounding the Proposed Project.

Chapter 4.0, References. Chapter 4.0 provides a list of references used in the preparation of this Addendum and identifies the people involved in its preparation and review.

1.2 PROJECT LOCATION

The Project location includes all unincorporated areas in the County. **Figure 2-2 in Chapter 2.0** of this Addendum depicts the aforementioned.

1.3 LEAD AGENCY AND ADDRESS

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1.5 STATUTORY AUTHORITY

CEQA recognizes that between the date an environmental document for a project is completed and the date that a project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is set may change; and/or 3) previously unknown information can arise. Before proceeding with a project within the scope of a previously certified

1.0 Introduction

EIR, CEQA requires the lead agency to evaluate these changes to determine whether they affect the conclusions in the prior environmental document.

When an EIR has been certified and a project within the scope of that evaluated in a previous EIR is modified or otherwise changed after certification, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Public Resources Code section 21166 and Guidelines sections 15162 through 15164.

Guidelines section 15162, subdivision a, provides that a subsequent EIR is not required unless any of the following occurs:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; and/or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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If a subsequent EIR is required pursuant to Guidelines section 15162, subdivision a, a supplemental EIR may be prepared instead if "only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation" (Guidelines, § 15163, subd. (a)).

If a subsequent EIR is not required pursuant to Guidelines section 15162, subdivision a, then the lead agency shall determine the appropriate further CEQA documentation, including no further documentation at all (Guidelines, § 15162, subd. (a)).

However, if a subsequent EIR is not required pursuant to Guidelines section 15162, subdivision a, but some changes or additions to the General Plan Update EIR have become necessary, an Addendum is required (Guidelines, § 15164, subd. (a)). An Addendum must include a brief explanation of the agency's decision not to prepare a subsequent EIR, supported by substantial evidence in the record (Guidelines, §15164, subd (e)). The Addendum to the EIR need not be circulated for public review, but it may be included in or attached to the final EIR (Guidelines, § 15164, subd. (c)). The decision-making body must consider the Addendum and the final EIR prior to making a decision on the project. (Guidelines, § 15164, subd. (d)).

1.6 CEQA GUIDELINES UPDATES

Since adoption of the General Plan Update and certification of the General Plan Update EIR, the CEQA Guidelines were revised to include separate analysis of impacts to Energy, Tribal Cultural Resources and Wildfire. Impacts to Energy, including impacts to electricity and natural gas, are analyzed in Section 5.17 Utilities and Service Systems of the General Plan Update EIR. Section 5.5 Cultural Resources of the General Plan Update EIR included discussion and analysis of tribal cultural resources. Wildfire is discussed in the General Plan Update EIR Section 5.8 Hazards and Hazardous Materials. These impacts are discussed in the same sections within this Addendum as they were discussed in the General Plan Update EIR.

In January 2018, the California Office of Planning and Research transmitted its proposal for the comprehensive updates to the Guidelines to the California Natural Resources Agency. Among other things, this package included proposed updates related to analyzing transportation impacts pursuant to Senate Bill 743, proposed updates to the analysis of greenhouse gas emissions, and revised Guidelines section 15126.2, subdivision a, in response to the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369. The updated Guidelines became effective in December 2018. The revised Guidelines only apply to a CEQA document if the revised Guidelines are in effect when the document is sent out for public review (Guidelines, § 15007, subd. (c)).

1.7 BACKGROUND AND PLANNING HISTORY

On October 6, 2015, the County certified the General Plan Update EIR and adopted the General Plan Update for the County. The General Plan Update was a comprehensive update of the County General Plan (General Plan) and associated actions. The General Plan includes goals, policies, implementation programs, ordinances and zone changes. The General Plan covers the unincorporated areas and accommodates new housing and employment opportunities in anticipation of population growth. The General Plan Update responded to California State (State) laws current at the time it was written. The General Plan Update included revisions to the land use map and new text, proposing progressive, innovative programs and policies. The General Plan Update focuses growth in the unincorporated areas with access to services and infrastructure and reduces the potential for growth in environmentally sensitive and hazardous areas. The General Plan Update EIR evaluates housing unit growth based on land use designations. Residential growth in housing units was assumed to be 80 percent of capacity (unless the maximum density is less than one unit per acre, in which case the maximum density was used).¹

The established objectives of the General Plan Update, as cited in the General Plan Update EIR, are as follows:

- Provide a comprehensive update to the General Plan that establishes the goals and policies to create a built environment that fosters the enjoyment, financial stability, and well-being of the unincorporated areas and County.
- Improve the job-housing balance and fiscal sustainability by planning for a diversified employment base, providing a variety of commercial, industrial, and mixed-use land uses.
- Promote sustainability by locating new development near existing infrastructure, services, and jobs.
- Maintain environmentally sustainable communities and reduce greenhouse gas (GHG) emissions that contribute to climate change.
- Support a reasonable share of projected regional population growth.
- Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities.

¹ It should be noted that estimates of growth in housing units in the General Plan Update EIR (i.e., 80 percent of maximum capacity in the residential zones) far exceed forecasted growth as determined by Southern California Association of Governments (SCAG) in recent adopted growth forecasts.

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- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the character and ecological importance of the unincorporated areas.
- Provide policy guidance to protect and conserve natural resources and to improve the quality of air, water, and biological resources.
- Coordinate equitable sharing of public and private costs associated with providing appropriate community services and infrastructure, and in a context-sensitive manner that addresses community character.
- Ensure that development accounts for physical constraints and the natural hazards of the land.
- Recognize community and stakeholder interests while striving for consensus.
- Protect and enhance recreational opportunities and public access to open space and natural resources.

The General Plan Update EIR provides a programmatic analysis of the potential impacts of the buildout of the General Plan Update. In conjunction with the certification of the Final EIR in October 2015, the Board of Supervisors also adopted Findings of Fact, a Mitigation Monitoring and Reporting Program (MMRP), and a Statement of Overriding Considerations. The CEQA Findings adopted by the County indicate the General Plan Update would result in certain significant environmental impacts that could not be fully avoided by implementation of the feasible mitigation measures. These include impacts to air quality, transportation, utilities, and global climate change. Information and technical analyses from the General Plan Update EIR are summarized throughout this Addendum. The entire General Plan Update EIR is available for review at County offices located 320 W. Temple Street, 13th Floor, Los Angeles, CA 90012, and online at: <http://planning.lacounty.gov/generalplan/ceqa>.

1.8 OTHER PLANNING PROJECTS THAT IMPLEMENT GENERAL PLAN POLICIES

On February 20, 2018, the County Board of Supervisors directed the County Department of Regional Planning (DRP) to prepare an Affordable Housing Preservation Ordinance along with other ordinances to address the affordable housing needs in the unincorporated areas of the County. The AHPO is one out of four ordinances that the County has drafted at the direction of the Board of Supervisors to address the affordable housing needs in the County. The other three ordinances are briefly described below.

By-Right Housing Ordinance: The By-Right Housing Ordinance will streamline multi-family residential developments by allowing them by-right in certain zones. The By-Right Housing Ordinance will also

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include additional policies to further incentivize and streamline multifamily residential developments. “By-right” development is exempt from CEQA, and no public hearing is required. Allowing multi-family residential developments “by-right” in areas where appropriate and streamlining the review process can help property owners and developers save time and money, which in turn helps increase housing production. In addition, the By-Right Housing Ordinance (BRHO) clarifies how to determine the allowable density and includes a zone change program for internal consistency.

Interim and Supportive Housing Ordinance: The Interim and Supportive Housing Ordinance (ISHO) will ensure compliance with State law regarding shelters, and transitional and supportive housing, as well as other housing types for specific populations. ISHO includes local policies to further encourage development of shelters, transitional and supportive housing, and support the County’s efforts to provide solutions to vehicle living. The draft ISHO includes several components, including proposals to: allow accessory shelter use by-right in appropriate zones; offer reduced parking for shelters; enable and streamline conversion of hotels and motels to transitional housing or shelters in zones that permit multifamily and mixed use; and add standards for safe parking lots.

Inclusionary Housing Ordinance: The Inclusionary Housing Ordinance (IHO) requires new and substantial rehabilitation residential projects to set aside a percentage of units for affordable housing. The percentages range from 5-20 percent based on housing type, project size, project location and affordability level. The requirement to provide affordable housing may also be satisfied through limited off-site construction. The IHO would work in tandem with the County’s Density Bonus Ordinance in that projects providing affordable housing are also eligible for density bonus, reduced parking, streamlined environmental review and other incentives and/or waivers associated with development standards as provided in the County Density Bonus Ordinance.

In addition to the Proposed Project and three ordinances discussed above, one additional housing related ordinance is also being prepared by the Department of Regional Planning (DRP).

Accessory Dwelling Unit Ordinance: On January 1, 2020, new laws for accessory dwelling units (ADU) and junior accessory dwelling units (JADUs) were enacted by the State that rendered the County’s ADU Ordinance null and void. An ADU, also known as a granny or in-law unit, is a dwelling unit that is either attached to, located within the existing living area of, or detached from and located on the same lot as a single-family or multi-family residential building. A JADU is a dwelling unit that is no more than 500 square feet in size and contained entirely within single-family residence. ADUs and JADUs can be a source of rental income for homeowners or provide additional living space for family members or caregivers.

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The By-Right Housing Ordinance, Interim and Supportive Housing Ordinance, and Inclusionary Housing Ordinance are considered cumulative projects to this Project as they have the ability to create additional units through zoning changes focused on housing. In addition, the ADU Ordinance is also considered a cumulative project due to its similar time frame.

These ordinances would all work to address the County’s affordable housing needs. Therefore, in this Addendum, the cumulative analysis considers the impacts of the Proposed Project together with these related (but separate) housing ordinances.

1.9 MITIGATION REQUIREMENTS

The General Plan Update EIR included mitigation measures to reduce environmental impacts associated with the implementation of the General Plan Update. The General Plan Update EIR includes two types of mitigation: measures to be undertaken by the County and project-level measures to be undertaken by future project applicants, as appropriate, where potential significant impacts could occur when developing individual projects. **Table 1-1** shows all the mitigation measures from the General Plan Update EIR.

**Table 1-1
General Plan Update EIR Mitigation Measures**

Air Quality	
AQ-1	<p>If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable Air Quality Management District (AQMD) adopted thresholds of significance, the County of Los Angeles Planning Department shall require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:</p> <ul style="list-style-type: none"> • Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. • Ensuring construction equipment is properly serviced and maintained to the manufacturer’s standards. • Limiting nonessential idling of construction equipment to no more than five consecutive minutes. • Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. • Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). • Pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. • Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust. • Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material. • Hydroseed or apply non-toxic soil stabilizers to inactive construction areas. • Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).

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AQ-2	<p>New industrial or warehousing land uses that: 1) have the potential to generate 40 or more diesel trucks per day and 2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County of Los Angeles Planning Department prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project.</p>
AQ-3	<p>Applicants for sensitive land uses within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities:</p> <ul style="list-style-type: none"> • Industrial facilities within 1000 feet • Distribution centers (40 or more trucks per day) within 1,000 feet • Major transportation projects (50,000 or more vehicles per day) within 1,000 feet • Dry cleaners using perchloroethylene within 500 feet • Gasoline dispensing facilities within 300 feet <p>Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:</p> <ul style="list-style-type: none"> • Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters <p>Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County of Los Angeles and shall be verified by the County's Planning Department.</p>
AQ-4	<p>If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to County of Los Angeles. Facilities that have the potential to generate nuisance odors include but are not limited to:</p> <ul style="list-style-type: none"> • Wastewater treatment plants • Composting, greenwaste, or recycling facilities • Fiberglass manufacturing facilities • Painting/coating operations • Large-capacity coffee roasters • Food-processing facilities <p>If an odor management plan is determined to be required through CEQA review, the County shall require the project applicant to submit the plan prior to approval to ensure compliance with the applicable Air Quality Management District's Rule 402, for nuisance odors. If applicable, the Odor Management Plan shall identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.</p>
Biological Resources	
BIO-1	<p>Biological resources shall be analyzed on a project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the project site, and focused surveys should be conducted as necessary to</p>

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	determine the presence/absence of special-status species (e.g., focused sensitive plant or wildlife surveys). A biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as an analysis of those species with potential to occur onsite).
BIO-2	If there is potential for direct impacts to special-status species with implementation of construction activities, the project-specific biological resources assessment report (as mentioned in Mitigation Measure BIO-1) shall include mitigation measures requiring preconstruction surveys for special-status species and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities, as appropriate. If special-status species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or monitoring, construction activity shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. Relocations into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas should be the preferred goal of this measure. A qualified biologist shall be on site to conduct surveys, to perform or oversee implementation of protective measures, and to determine when construction activity may resume.
BIO-3	No feasible mitigation measures are available that would reduce impacts to wildlife movement completely. However, corridors shall not be entirely closed by any development, and partial mitigation shall be mandatory for impact on wildlife corridors and wildlife nursery sites. This shall include provision of a minimum of half the corridor width. (The width shall be at least what is needed to remain connective for the top predators using the corridor.) Mitigation can include preservation by deed in perpetuity of other parts of the wildlife corridor connecting through the development area; it can include native landscaping to provide cover on the corridor. For nursery site impacts, mitigation shall include preservation by deed in perpetuity for another comparable nursery site of the same species.
Cultural Resources	
CUL-1	Provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources.
CUL-2	Draft a comprehensive historic preservation ordinance for the unincorporated areas.
CUL-3	Prepare an Adaptive Reuse Ordinance within the context of, and in compliance with, existing building codes that considers the conversion of older, economically distressed or historically-significant buildings into multifamily residential developments, live-and-work units, mixed use developments, or commercial uses.
CUL-4	Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified archaeologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate. If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the archaeologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification. Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County. Unanticipated discoveries shall be evaluated for significance by a County-certified archaeologist. If the archaeological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the California State University Fullerton; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation (Building, Structure, and Object Record; Archaeological Site Record; or District Record, as applicable).
CUL-5	Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified paleontologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue paleontological resources as necessary. The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontologist resource surveillance, and shall establish, in

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	<p>cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.</p> <p>If the paleontological resources are found to be significant, the paleontologist observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the paleontologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.</p> <p>Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County. Unanticipated discoveries shall be evaluated for significance by a County-certified paleontologist. If the paleontological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the California State University Fullerton; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation.</p>
Greenhouse Gas Emissions	
GHG-1	<p>The County shall monitor GHG emissions by updating its GHG emissions inventory every five years. Upon the next update to the CCAP, the inventory, GHG reduction measures, and GHG reductions should be forecasted to 2035 to ensure progress toward achieving an interim target that aligns with the long-term GHG reduction goals of Executive Order S 03 05. The CCAP update should take into account the reductions achievable due to federal and state action as well as ongoing work by the County government and the private sector. The 2035 CCAP update shall be complete by January 1, 2021 with a plan to achieve GHG reductions for 2035 or 2040 provided the state has an actual plan to achieve reductions for 2035 or 2040. New reduction programs in similar sectors as the proposed CCAP (building energy, transportation, waste, water, wastewater, agriculture and others) will likely be necessary. Future targets should be considered in alignment with state reduction targets, as feasible, but it is premature at this time to determine whether or not such targets can be feasibly met through the combination of federal, state, and local action given technical, logistical and financial constraints. Future updates to the CCAP should account for the horizon beyond 2035 as the state adopts actual plans to meet post-2035 targets.</p>
Hydrology and Water Quality	
HYD-1	<p>Prior to approval of a tentative map, future project applicants/developers shall provide proof to the Department of Public Works that all structures are located outside the 100-year floodplain.</p>
Noise	
N-1	<p>Construction activities associated with new development that occurs near sensitive receptors shall be evaluated for potential noise impacts. Mitigation measures such as installation of temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing non-essential idling of construction equipment to no more than five minutes shall be incorporated into the construction operations to reduce construction-related noise to the extent feasible.</p>
N-2	<p>Prior to the issuance of building permits for any project that involves a noise sensitive use within the 65 dBA CNEL contour (i.e., areas in or above 65 dBA CNEL) along major roadways and freeways the project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features (e.g., setbacks, berms, or sound walls), and/or required building acoustical improvements (e.g., sound transmission class rated windows, doors, and attic baffling) to ensure compliance with the County's Noise Compatibility Criteria and the California State Building Code and California Noise Insulation Standards (Title 24 of the California Code of Regulations).</p>
N-3	<p>New development that occurs within 200 feet of a railroad track (according to the FTA's vibration screening distances) shall be evaluated for potential vibration impacts. The project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features and/or required building construction improvements to ensure that vibration impacts would remain below acceptable levels of 0.08 RMS in/sec for residential uses.</p>
N-4	<p>Individual projects that use vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, near sensitive receptors shall be evaluated for potential vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the Federal Transit Administration's vibration annoyance criterion of 78 VdB at sensitive receptor locations), additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., drilled piles to eliminate use of vibration-intensive pile driver).</p>

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N-5	Prior to the issuance of building permits, proposed heavy industrial projects are required to provide evidence that vibration due to the operation of machinery would not adversely affect nearby vibration sensitive uses such as commercial, hotel, institutional, and residential uses. The project property owner/developers shall retain an acoustical engineer to conduct a vibration analysis and identify, where appropriate, project design features and/or required building/ equipment improvements to ensure that vibration impacts would remain below acceptable levels of 78 VdB at sensitive receptor locations. This vibration level is considered to be significant at vibration-sensitive uses. This can be accomplished with vibration-reducing measures such as, but not limited to, equipment placement, equipment selection, vibration dampers, and/or changes to operation modes (speed, power, frequency).
Population and Housing	
PH-1	Prior to adoption of the Antelope Valley Area Plan Update, the County shall identify land use changes to achieve a minimum jobs-housing ratio of 1.3 for the Antelope Valley Planning Area.
Public Services	
PS-1	Prior to issuance of building permits, future project applicants/developers shall pay the Los Angeles County Fire Department Developer Fee in effect at that time.
PS-2	Each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. Final fire flows shall be determined by LACoFD in accordance with Appendix B of the County Fire Code The required fire apparatus road and water requirements shall be in place prior to construction.
PS-3	Prior to approval of a tentative map, a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area, as required by Section 1117.2.1 of the County Fire Code and approved by LACoFD prior to building permit issuance.
PS-4	Prior to adoption of the Antelope Valley Area Plan, the County shall identify an implementation program to ensure adequate funding is available to provide law enforcement services within the Antelope Valley Planning Area. The funding mechanism must provide sufficient revenue to pay for land acquisition, engineering, construction, installation, purchasing, or any other direct costs for capital law enforcement facilities and equipment needed to serve the new development in the Antelope Valley Planning Area.
Transportation/Traffic	
T-1	The County shall continue to monitor potential impacts on roadway segments and intersections on a project by project basis as buildout occurs by requiring traffic studies for all projects that could significantly impact traffic and circulation patterns. Future projects shall be evaluated and traffic improvements shall be identified to maintain minimum levels of service in accordance with the County's Traffic Impact Analysis Guidelines, where feasible mitigation is available. ²
T-2	The County shall implement over time objectives and policies contained within the General Plan Mobility Element. Implementation of those policies will help mitigate any potential impacts of Project growth and/or highway amendments on the transportation system.
T-3	The County shall participate with Metro, the Congestion Management Program (CMP) Agency in Los Angeles County, on a potential Congestion Mitigation Fee program that would replace the current CMP Debit/Credit approach. Under a countywide fee program, each jurisdiction, including the County, will select and build capital transportation projects, adopt a fee ordinance, collect fees and control revenues. A fee program will require a nexus analysis, apply only to net new construction on commercial and industrial space and additional residential units and needs to be approved by Metro and the local jurisdictions. A countywide fee, if adopted, will allow the County to mitigate the impacts of development via the payment of the transportation impact fee in lieu of asking each development project for individual mitigation measures, or asking for fair share payments of mitigation. The fee program would itself constitute a "fair share" program that would apply to all development (of a certain size) within the unincorporated areas.
T-4	The County shall work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent unincorporated areas. This includes adding or extending mixed flow general purpose lanes, adding or extending existing HOV lanes, adding Express Lanes (high occupancy toll lanes), incorporating truck climbing lanes, improving interchanges and other freeway related improvements.

² [Since certification of the General Plan EIR, CEQA was revised such that delay based metrics, including levels of service \(and associated mitigation measures\) are no longer required. Instead, CEQA now requires vehicle miles traveled \(VMT\) be the primary metric for evaluating transportation impacts.](#)

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T-5	<p>The County shall require traffic engineering firms retained to prepare traffic impact studies for future development projects to consult with Caltrans, when a development proposal meets the requirements of Statewide, regional, or area wide significance per CEQA Guidelines §15206(b). Proposed developments meeting the criteria of Statewide, regional or area wide include:</p> <ul style="list-style-type: none"> • Proposed residential developments of more than 500 dwelling units • Proposed shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. • Proposed commercial office buildings employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space • Proposed hotel/motel developments of more than 500 rooms • When the CEQA criteria of regional significance is not met, Caltrans recommends transportation engineers and/or city representatives consult Caltrans when a proposed development includes the following characteristics: <ul style="list-style-type: none"> • All proposed developments that have the potential to cause a significant impact to state facilities (right of way, interchanges, interchanges, etc.) and when required mitigation improvements are proposed in the initial study. Mitigation concurrence should be obtained from Caltrans as early as possible. • Any development which assigns 50 or more trips during peak hours to a state highway (freeways). • Any development located adjacent to or within 100 feet of a State highway facility and may require a Caltrans Encroachment Permit. (Exceptions: additions to single family homes or 10 residential units or less). • When it cannot be determined whether or not Caltrans will expect a traffic impact analysis pursuant to CEQA.
Utilities and Service Systems	
USS-1	Require the use of drought tolerant landscaping, native California plant materials, and evapotranspiration (smart) irrigation systems.
USS-2	Require the use of low-flow fixtures in all non-residential development and residential development with five or more dwelling units, which may include but are not limited to water conserving shower heads, toilets, waterless urinals and motion-sensor faucets, and encourage use of such fixtures in building retrofits as appropriate.
USS-3	Require low water use landscaping in new residential subdivisions and other private development projects, including a reduction in the amount of turf-grass.
USS-4	Promote the use of low-flow and/or waterless plumbing fixtures and appliances in all new non-residential development and residential development of five or more dwelling units.
USS-5	Support amendments to the County Building Code that would promote upgrades to water and energy efficiency when issuing permits for renovations or additions to existing buildings.
USS-6	Apply water conservation policies to all pending development projects, including approved tentative subdivision maps to the extent permitted by law. Where precluded from adding requirements by vested entitlements, encourage water conservation in construction and landscape design.
USS-7	Require new development to provide the infrastructure needed for delivery of recycled water to the property for use in irrigation, even if the recycled water main delivery lines have not yet reached the site, where deemed appropriate by the reviewing authority.
USS-8	Promote the installation of rainwater capture and gray water systems in new development for irrigation, where feasible and practicable.
USS-9	Promote energy efficiency and water conservation upgrades to existing nonresidential buildings at the time of major remodel or additions.
USS-10	Promote the use of permeable paving materials to allow infiltration of surface water into the water table.
USS-11	Maintain stormwater runoff on site by directing drainage into rain gardens, natural landscaped swales, rain barrels, permeable areas, and use of drainage areas as design elements, where feasible and reasonable.
USS-12	Seek methods to decrease impermeable site area where reasonable and feasible, in order to reduce stormwater runoff and increase groundwater infiltration, including use of shared parking and other means, as appropriate.
USS-13	On previously developed sites proposed for major alteration, provide stormwater management improvements to restore natural infiltration, as required by the reviewing authority.

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USS-14	Encourage and promote the use of new materials and technology for improved stormwater management, such as pervious paving, green roofs, rain gardens, and vegetated swales.
USS-15	Where detention and retention basins or ponds are required, seek methods to integrate these areas into the landscaping design of the site as amenity areas, such as a network of small ephemeral swales treated with attractive planting.
USS-16	Evaluate development proposals for consistency with the County Green Building Standards Code.
USS-17	Promote Low Impact Development standards on development sites, including but not limited to minimizing impervious surface area and promoting infiltration, in order to reduce the flow and velocity of stormwater runoff throughout the watershed.
USS-18	Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.
USS-19	Monitor growth and coordinate with water districts as needed to ensure that long-range needs for potable and reclaimed water will be met.
USS-20	If water supplies are reduced from projected levels due to drought, emergency, or other unanticipated events, take appropriate steps to limit, reduce, or otherwise modify growth permitted by the General Plan in consultation with water districts to ensure adequate long-term supply for existing businesses and residents.
USS-21	Upon the availability of non-potable water, discourage and consider restrictions on the use of potable water for washing outdoor surfaces.
USS-22	In cooperation with the Sanitation Districts and other affected agencies, expand opportunities for use of recycled water for the purposes of landscape maintenance, construction, water recharge, and other uses as appropriate.
USS-23	In coordination with applicable water suppliers, adopt and implement a water conservation strategy for public and private development.

1.10 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS IDENTIFIED IN GENERAL PLAN UPDATE EIR COMPARED TO IMPACTS OF AHPO

This Addendum will consider whether the new housing units expected from the AHPO would result in a new significant environmental impact or more severe significant environmental impacts than previously identified in the General Plan Update EIR, thereby, requiring a major revision to the EIR. Below is a summary of the analysis as to whether this Addendum to the General Plan Update EIR identified new or more severe significant environmental impacts than those identified in the General Plan Update EIR related to the AHPO.

Chapter 3.0 of this Addendum includes a detailed evaluation of environmental effects associated with the AHPO, as compared to impacts identified in the General Plan Update EIR for each CEQA environmental factor, organized in the same manner as the General Plan Update EIR. Anticipated affordable housing development under the AHPO represents a small fraction of the total reasonably foreseeable development analyzed in the General Plan Update EIR. The General Plan Update EIR evaluated all forecast land use development in (based on zoning capacity) the County that would be constructed and implemented/occupied between 2013 (the General Plan Update EIR baseline year) and 2035. The AHPO would ensure that the existing affordable housing stock is maintained. Affordable housing units represent a fraction of the total development anticipated in the General Plan Update EIR. It is also possible that the

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AHPO would inhibit development because of the requirements being considered too onerous, potentially leading to less development than would otherwise occur.

Table 1-2 below provides a summary of impacts as identified in the General Plan and analyzed in this Addendum. However, only a limited summary of impacts is provided for the AHPO condominium conversion notification policy and mobilehome park policies due to the following: The AHPO includes notification policies with respect to condominium conversions; these policies do not have the potential to result in physical environmental impacts. The AHPO also provides a new administrative pathway to legalize existing density in excess of what is permitted, for existing mobilehome parks. Some mobilehome parks have existing infrastructure deficiencies, for which the ordinance would facilitate repair, maintenance, as well as like-for-like rebuild if damaged or destroyed. Such repairs and replacements would also result in minor if any physical environmental impacts. The aforementioned are discussed more in Chapters 2.0 and 3.0.

**Table 1-2
Summary of Impacts
General Plan Update EIR Impacts Compared to AHPO Impacts**

Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Aesthetics Adverse effect on a scenic vista.	Less than significant. The existing regulatory setting, as well as the goals and policies contained in the General Plan Update, would serve to lessen potential impacts to scenic vistas. Additionally, approval of the General Plan Update does not authorize construction of development that would affect scenic vistas. Therefore, under the General Plan Update EIR, impacts were found to be less than significant, and no mitigation measures were required.	Less than significant. Because the AHPO generally requires replacement of affordable units on a one-to-one basis, it is not anticipated to substantially change the location that development would occur. For inclusionary projects, the ordinance would allow for off-site replacement in accordance with specified criteria (off-site replacement would only be allowed for projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not increase development compared to what was analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Substantially damage scenic resources within a state scenic highway.	Less than significant. The General Plan Update EIR concluded that no development or changes would occur along or near any of the three adopted state scenic highways within Los Angeles County. While some development or changes could occur near the eligible scenic highways, the development or	No impact. State scenic highways in unincorporated parts of the County are located within Very High Fire Hazard Severity Zones (VHFHSZ), where the replacement requirements of AHPO do not apply. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	changes anticipated to occur would be minimal and would only occur near small stretches of the eligible scenic highways. Furthermore, goals and policies of the General Plan would serve to minimize potential impacts to scenic highways. Therefore, the General Plan Update EIR concluded that no significant impact would result from implementation of the General Plan with respect to substantial alteration of scenic resources within a designated scenic highway.	substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Degradation of visual character.	Less than Significant. The General Plan Update EIR concluded the guiding principles, goals, policies, and implementation programs contained in the General Plan would serve to lessen or mitigate potential impacts by providing direction for future decision making, as well as by requiring additional future review of potential impacts of individual development projects that would be accommodated by the General Plan. Therefore, the General Plan Update EIR found impacts related to changes in visual character to be less than significant.	Less than Significant. As concluded in the General Plan Update EIR, changes in land use would generally be limited to areas that feature existing urban development. General Plan goals and policies would remain in effect to lessen and mitigate any potential impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Increase in light and glare.	Less than Significant. The General Plan Update EIR concluded that development would generally occur in urbanized areas where existing lighting and light pollution are already high, these increases in light and glare would not be substantial. In rural areas of the County growth could also potentially diminish nighttime views and/or dark skies, but applicable regulations would minimize these impacts. The General Plan Update EIR found impacts related to light and glare would be less than significant.	Less than Significant. The AHPO could lead to incrementally larger projects than would otherwise have occurred without the AHPO. However, these projects would likely be in urban areas that would not be substantially affected by these incremental increases in shade/shadow. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Agricultural and Forest Resources		
Convert Prime, Unique, or Important Farmland.	Significant and Unavoidable. The General Plan Update EIR concluded that implementation of the Agricultural Resource Area (ARA) policies under the General Plan would reduce both direct and indirect impacts of conversion of mapped Important Farmland. However, these ARAs would not be agricultural preserves and some conversion to non-agricultural uses would be permitted. As such, impacts due to buildout of the General Plan were identified as significant in the Antelope Valley Planning Area and Santa Monica Mountains Planning Area. However, impacts in the remaining nine Planning areas were identified as less than	Less than Significant. Because the AHPO does not incentivize development and off-site replacement is restricted in location (off-site replacement of affordable units would only be allowed for projects subject to the Inclusionary Housing Ordinance that do not use a density bonus and few such projects are anticipated to occur), the AHPO would not result in substantial construction in areas of Important Farmland as these areas do not contain large numbers of affordable housing units, nor are they zoned for such use. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	significant.	
Conflict with zoning for agricultural use, or a Williamson Act contract.	No Impact. The General Plan Update EIR concluded that implementation of the zoning changes within the General Plan would not involve any rezoning of farmland and impacts regarding conversion of farmland to non-agricultural uses would be less than significant. Furthermore, the General Plan Update EIR identified that the only Williamson Act contracts in effect in Los Angeles County are located on Santa Catalina Island, of which there is no Important Farmland mapped.	No Impact. The AHPO would require replacement of lost affordable units. Any losses of agriculturally zoned land are generally anticipated to involve small areas and/or already be used for housing. Therefore, impacts to Williamson Act contracts as a result of the development in accordance with the AHPO would not substantially change as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Rezoning forestland or timberland.	No Impact. The General Plan Update EIR found that the General Plan includes the addition of two new zones created for future use in rural areas. However, neither of these zones are added to the Zoning Map. The remaining zones added as part of the General Plan would only be designated in intensely urban areas and would thus not impact forest land. As the County has no existing zoning specifically designating forest use, implementation of the General Plan would not conflict with existing zoning for forest land or timberland.	No Impact. The replacement requirements of the AHPO do not apply in VHFHSZs, a designation that applies to forest land in unincorporated Los Angeles County. The AHPO is generally anticipated to apply to areas of the County where development exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Loss or conversion of forest land to non-forest use.	Less than Significant. The General Plan Update EIR indicates that Forest land within Los Angeles County is protected through the County's Significant Ecological Area (SEA) Ordinance. Compliance with the SEA Ordinance would reduce potential impacts to forest land to a less than significant level.	Less than Significant. While affordable housing units may be located in forest areas, any redevelopment including replacement units would generally be expected to impact areas already developed. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.
Conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.	Significant and Unavoidable. The General Plan EIR found that in the Antelope Valley Planning Area and Santa Clarita Valley Planning Area there would be a significant indirect impact on conversion of mapped Important Farmland to nonagricultural use due to pressure to convert farmland to non-agricultural uses and related incompatibilities between agricultural and urban uses. The General Plan Update EIR indicated that there are no feasible mitigation measures to reduce impacts to farmland in these areas. Impacts in the nine other Planning Areas would be less than significant.	No Impact. The AHPO would not substantially change allowable land uses or result in a substantial net increase in units as it generally requires a one-for-one replacement of affordable units. Forests and farmlands would not be significantly impacted. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Air Quality		
Conflict with or the potential to obstruct implementation of the	Significant and Unavoidable. The General Plan Update EIR indicates buildout of the General Plan in 2035 would	Less than Significant. Since the release of the General Plan Update EIR, the SCAQMD adopted an updated AQMP in 2017

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
applicable air quality plan.	result in higher populations for the unincorporated areas of the County. The General Plan Update EIR concludes that individual development projects would be consistent with the control measures and regulations identified in the SCAQMD and AVAQMD's AQMPs. However, the General Plan EIR found that development would not be consistent with the AQMPs because the buildout in the unincorporated areas would exceed forecasts in the AQMP.	that incorporates SCAG's updated population projection numbers from the 2016/2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that would account for the population increase in unincorporated areas of the County. However, the AVAQMD's Ozone Attainment Plan has not been updated and as a result there is the potential for development from the General Plan Update to exceed the AVAQMD's plan. Generally, the AHPO would not result in a substantial increase in development or units. The AHPO would not increase development as compared to what was evaluated in the General Plan Update EIR. The AHPO would not substantially change impacts related to any air quality management plan as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Violate any air quality standard or contribute substantially to existing or projected air violation.	Significant and Unavoidable. The General Plan Update EIR concluded that for a broad-based General Plan, it is not possible to determine whether the scale and phasing of individual projects could result in the exceedance of the SCAQMD's or the AVAQMD's short-term regional or localized construction emissions thresholds. Mitigation Measure AQ-1, regulatory measures, as well as goals and policies in the General Plan would reduce air pollutant emissions. However, due to the likely scale and extent of construction activities pursuant to the future development that would be accommodated by the General Plan, at least some projects would likely continue to exceed the SCAQMD and AVAQMD thresholds. Therefore, the General Plan EIR determined construction-related air quality impacts of the buildout of the General Plan would be significant and unavoidable.	Significant and Unavoidable. As indicated in the General Plan Update EIR, the risk posed from Valley Fever would be reduced to less than significant levels with the implementation of the SCAQMD or AVAQMD's fugitive dust measures. However, even with the implementation of Mitigation Measure AQ-1 , regulatory measures, as well as general plan goals and policies, it is likely that some projects would exceed the relevant SCAQMD and AVAQMD criteria air pollutant thresholds, as described above, these impacts were fully disclosed within the General Plan Update EIR and no new or greater impacts would occur. Individual projects would result in emissions as a result of mobile sources (vehicles) and stationary sources (heating, ventilation and air conditioning, lighting, landscape equipment). The AHPO would not substantially change construction or operational air quality impacts relative to violation of air quality standards as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Cumulatively considerable net increase of any criteria pollutant	Significant and Unavoidable. The General Plan Update EIR concluded that buildout of the land use plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Mitigation Measure AQ-1 as well as General Plan goals and policies would reduce these impacts. However, due to the magnitude of emissions generated by the buildout, mitigation measures would not reduce impacts below SCAQMD's or AVAQMD's	Significant and Unavoidable. Generally, the AHPO would not result in a substantial increase in units. The AHPO would not result in growth greater than evaluated in the General Plan Update EIR or growth anticipated in the 2016 AQMP.

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Expose sensitive receptors to substantial pollutant concentrations.	<p>thresholds.</p> <p>Less than Significant with Mitigation. The General Plan Update EIR indicated that, due to the broad-based nature of the EIR, it was not possible to determine whether the scale and phasing of individual projects would result in the exceedance of localized emissions thresholds. Nevertheless, because of the likely scale of future development that would be accommodated under the General Plan, at least some projects were expected to individually result in exceedances of the CAAQS and/or NAAQS. New land uses in the unincorporated areas are expected to generate truck trips that could generate an increase in DPM that would contribute to cancer and non-cancer risks in the SoCAB and/or Antelope Valley portion of the MDAB. These increased truck trips could impact existing sensitive receptors. Since the nature of these emissions could not be determined at the time of General Plan preparation, the impacts are considered significant. Mitigation Measure AQ-3 would ensure that placement of sensitive receptors near major sources of air pollution would achieve the incremental risk thresholds established by SCAQMD and AVAQMD, and impacts would be less than significant.</p>	<p>Less than Significant with Mitigation. The AHPO would not generate new sources of mobile or stationary-source TAC emissions typically associated with industrial or commercial processes. Mitigation Measure AQ-3 requires projects that will site new sensitive receptors within a certain distance of land uses associated with high levels of TAC emissions to prepare a health risk assessment and, if necessary, apply additional on-site mitigation. The AHPO would not substantially change air quality impacts relative to sensitive receptors as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Create objectionable odors.	<p>Less than Significant with Mitigation. The General Plan Update EIR concluded that industrial land uses associated with the General Plan could create objectionable odors. However, Mitigation Measure AQ-4 would ensure that odor impacts are minimized and facilities would comply with SCAQMD and AVAQMD Rule 402. Therefore, impacts were considered less than significant.</p>	<p>Less than significant. The AHPO would not encourage the development of industrial land uses that could create objectionable odors. Residential use is not associated with odor nuisance and therefore this impact is less than significant. The AHPO would not substantially change odor impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Biological Resources		
Effect on candidate, sensitive, or special status species.	<p>Significant and Unavoidable. The General Plan Update EIR concluded that the buildout of the General Plan will result in impacts to various habitat types, which will result in the loss of special-status species through direct mortality or via indirect effects (e.g., through wildlife habitat loss and edge effects at the urban-wildland interface). Mitigation Measures BIO-1 and BIO-2 would reduce direct impacts, there is no mitigation provided for the indirect impacts to special-status species through the loss of common (i.e., non-sensitive) habitats. Thus, impacts are</p>	<p>Less than Significant. Any AHPO projects which occur within SEA designated areas would be subject to all existing regulations in the SEA. Mitigation Measures BIO-1 and BIO-2 would remain in effect to mitigate potential direct impacts to a less than significant level. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. However, indirect impacts would remain significant and unavoidable, as was determined in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no</p>

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	considered significant and unavoidable.	new or greater impacts would occur.
Effect on riparian habitats, other sensitive natural communities.	<p>Less than Significant with Mitigation. The General Plan Update EIR concluded that buildout of the General Plan will impact various habitat types, including riparian habitat and other sensitive plant communities. Mitigation Measures BIO-1 and BIO-3 would reduce impacts to sensitive habitat to a less than significant level.</p>	<p>Less than Significant. New AHPO projects proposed within an SEA would be subject to all existing regulations. However, SEAs are frequently located within VHFHSZs, where the replacement requirement of the AHPO does not apply. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Any projects that may occur in SEAs would be subject to Mitigation Measure BIO-1 and BIO-3 would remain in effect to reduce potential impacts to a less than significant level. The AHPO would not result in substantial housing construction in sensitive natural communities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Effect on protected wetlands.	<p>Less than Significant with Mitigation. The General Plan Update EIR concluded that buildout of the General Plan may impact wetland areas and these impacts may have a significant adverse effect on wetlands through hydromodification, filling, diversion or change in water quality. Mitigation Measure BIO-1 would in combination with the requirements for regulatory permitting (e.g., Section 404 permitting and any associated mitigation requirements), impacts to wetlands would be considered less than significant.</p>	<p>Less than Significant. The AHPO would not increase the overall growth and development beyond what is anticipated in the General Plan Update EIR, nor would the ordinance change the location of planned development. Unincorporated Los Angeles County contains areas with coastal wetlands, drainages, marshes and vernal pools. No new or greater impacts would occur.</p>
Potential to interfere with movement of wildlife species.	<p>Significant and Unavoidable. The General Plan Update EIR indicated that buildout could impact regional wildlife linkages and nursery sites, constituting a potentially significant adverse effect on wildlife movement and nursery sites. Mitigation Measure BIO-1 and the SEA Ordinance provide some protection to avoid or minimize impacts to wildlife corridors and nursery sites; however, for those projects where avoidance or minimization of impacts is infeasible, the policies proposed in the General Plan do not provide for mitigation for loss of wildlife movement opportunities or nursery sites. If development impacts regional wildlife linkages and impedes wildlife movement, connectivity will be lost on a regional scale in these vital landscape corridors and linkages. Thus, impacts to wildlife movement are significant and unavoidable.</p>	<p>Less than Significant. While limited amounts of affordable housing could occur in proximity to sensitive areas, any replacement units are generally anticipated to occur in the footprint of existing development because of the small number of units involved and restrictions on location of off-site units (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Any projects developed within an SEA would be subject to existing regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Potential to conflict with any local policies	Less than Significant.	Less than Significant.

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protecting biological resources, such as a tree preservation ordinance.	The General Plan Update EIR indicates that development will impact oak trees and oak woodlands. The County Oak Tree Ordinance and Oak Woodlands Conservation Management Plan (OWCMP) are applied on a project-specific level and consistency with these plans is determined on a project-by-project basis. The General Plan Update EIR found that the policies of the General Plan support the conservation of oak trees and oak woodlands and do not conflict with the County Oak Tree Ordinance or OWCMP.	The removal of oak trees requires appropriate permits and approvals through the Los Angeles County Department of Regional Planning, such as Oak Tree Permits. The AHPO would not make any changes to the County Oak Tree Ordinance or OWCMP. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Potential to conflict with the provisions of an adopted habitat conservation plan.	Less than Significant. The General Plan Update EIR found that the policies of the General Plan Update would not conflict with these goals and policies of these plans and LCPs and that impacts would be less than significant.	Less than Significant. The AHPO would not make any changes to the coastal land use plans and local coastal programs. There would continue to be no conflict with respect to compliance with any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Cultural Resources		
Significant historical resources.	Significant and Unavoidable. Large number of historical resources could be disturbed. The General Plan Update EIR concluded that compliance with the goals, policies, and implementation measures of the General Plan would reduce impacts to historical resources. However, the policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the General Plan. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur in the future. Mitigation Measures CUL-1, CUL-2, and CUL-3 would reduce impacts to historic resources, but impacts are considered significant and unavoidable.	Less than Significant with Mitigation. The policies within the General Plan Update would continue to minimize the probability of historic structures being demolished and Mitigation Measures CUL-1, CUL-2, and CUL-3 would reduce impacts to historic resources. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Archaeological Resources.	Less than Significant with Mitigation.	Less than Significant with Mitigation.

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	<p>The General Plan Update EIR concluded that development could impact known and unknown archaeological sites. However, existing federal, state, and local regulations address the provision of studies to identify archaeological resources. Mitigation Measures CUL-4 and CUL-5, which apply in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, would reduce impacts to a less than significant level.</p>	<p>Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. If unexpected archaeological or paleontological resources are discovered during excavation activities such resources must be evaluated in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code §21083.2, Health and Safety Code §7050.5, Public Resource Code §5097.98, and Guidelines § 5064.5(e) address how unexpected finds of human remains are to be handled. In addition, mitigation measures identified in the General Plan Update EIR would apply to development under the AHPO. No new or greater impacts would occur than identified in the General Plan Update EIR.</p>
<p>Unique Paleontological Resources.</p>	<p>Less than Significant with Mitigation. The General Plan Update EIR indicates ground disturbance could damage fossils buried in soils. Abundant fossils occur in several rock formations in the County. These formations have produced numerous important fossil specimens. Therefore, the County contains significant, nonrenewable, paleontological resources and are considered to have high sensitivity. Implementation of Mitigation Measures CUL-4 and CUL-5 would reduce impacts to a less than significant level.</p>	<p>Less than Significant with Mitigation. In cases where undeveloped parcels could contain paleontological resources, or parcels that are adjacent to paleontological resources, may have to undergo mitigation per consultation with a designated paleontologist or archeologist, consistent with Mitigation Measure CUL-4 (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. In the event that paleontological resources are encountered during excavation, the project would be required to halt all development activities and retain the services of a qualified paleontologist, who can advise when construction activities can recommence, per the PRC §5097.5. Compliance with these guidelines would ensure no new or greater impacts would occur than identified in the General Plan Update EIR.</p>
<p>Human remains.</p>	<p>Less than Significant. The General Plan Update EIR determined that excavation during construction activities has the potential to disturb human burial grounds, including Native American burials, in underdeveloped areas of Los Angeles County. However, there are Public Resources Code Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also have provisions</p>	<p>Less than significant. Projects subject to the AHPO would be required to comply with PRC § 5097.98 as well as the Health and Safety Code (§§ 7050.5, 7051, and 7054). While there is some potential to disturb human remains at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

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	protecting human burial remains from disturbance, vandalism, or destruction. Therefore, compliance with these regulations would ensure impacts to human burial grounds are less than significant.	
Tribal Cultural Resources	Less than Significant with Mitigation. The General Plan Update EIR concluded that development of projects pursuant to the General Plan Update could impact known and unknown archaeological sites. The General Plan Update EIR noted that at the time there were 85 Native American sacred sites under CEQA in association with archaeological resources or, in the case of burial locations, human remains. The Project Area is considered potentially sensitive for archaeological resources. However, Mitigation Measure CUL-4, which applies in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, would reduce impacts to a less than significant level.	Less than Significant with Mitigation. The AHPO applies to replacement of existing affordable housing on sites that are proposed for redevelopment. Such sites are already disturbed and the likelihood of impacts related to resources would be low. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Mitigation Measure CUL-4 would continue to apply and impacts would be reduced to a less than significant level. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Geology and Soils		
Earthquake faults, ground shaking, ground-failure, liquefaction, landslides.	Less than Significant. Compliance with existing state and county regulations, as well as the goals and policies included as part of the General Plan would ensure that impacts associated with exposure to strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides are reduced to a less than significant level.	Less than Significant. The AHPO would not increase development beyond what is anticipated under the General Plan Update, as it requires one to one replacement of affordable housing. Mobilehome parks are subject to the State's seismic safety regulations outlined in Title 25 of the California Code of Regulations. Residential projects subject to the AHPO would have to comply with the Alquist-Priolo Earthquake Fault Zoning Act, regardless of whether replacement units are provided on- or off-site. Development under the AHPO would not exacerbate existing earthquake faults and associated risks conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Soil erosion and loss of topsoil	Less than Significant. Construction and site grading of future development projects pursuant to the General Plan could cause substantial soil erosion without effective soil-erosion measures. Adherence to the requirements of the County Code and the CBC, together with the safeguards afforded by the County's building plan check and development review process, would help ensure that appropriate erosion controls are devised and implemented during	Less than Significant. AHPO projects would be required to comply with CBC regulations and the County's development review process, which would ensure appropriate erosion controls are devised and implemented during project construction. Applicable AHPO projects would also have to comply with NPDES requirements as appropriate. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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	<p>construction. Furthermore, construction activities on project sites larger than one acre would be subject to National Pollution Discharge Elimination System (NPDES) requirements. Required erosion control measures may include temporary and/or permanent erosion control measures such as desilting basins, check dams, riprap or other devices or methods, as approved by the County. Consequently, impacts would be less than significant.</p>	
<p>Unstable geologic unit or expansive soil</p>	<p>Less than Significant. Buildout of the General Plan would increase numbers of residents, workers, and structures in Los Angeles County. The County is geographically expansive, embracing a variety of geologic settings and soil types. Areas of unstable geologic units or unstable or expansive soils are known to occur locally. Development considered for approval under the General Plan could expose structures or persons to potentially significant hazards due to unstable geologic units or soils. Compliance with existing state and county regulations, as well as the goals and policies included as part of the General Plan would ensure that the impacts associated with erosion and topsoil loss, as well as development atop unstable geologic units and soil, or expansive soil are minimized to the maximum extent practicable. Consequently, the overall, associated impacts would be less than significant.</p>	<p>Less than Significant. Development under the AHPO has the potential to expose structures or persons to hazards due to unstable geologic units or soils. However, compliance with existing state and county regulations, as well as relevant General Plan goals and policies, would ensure that no new or greater impacts would occur. Development under the AHPO would not exacerbate existing soil conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Septic tanks or alternative waste water disposal systems</p>	<p>Less than significant. The General Plan Update EIR concluded that soil conditions would adequately support proposed septic tanks. Most new development that is anticipated in the County would not require the use of septic tanks or alternative wastewater disposal systems. In those few cases where septic systems might be necessary, such as rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, the prevailing soil conditions in Los Angeles County are generally amenable to the use to such systems. In addition, all on-site wastewater treatment systems (OWTS) will be required to comply with County Code, Titles 11 and 28 and other regulations applicable to OWTS, including requirements for preparation and submittal of feasibility reports in order to obtain the Department of Public Health - Environmental Health approval for construction and installation of OWTS. As such, there would be no impact from</p>	<p>Less than Significant. The AHPO does not increase development beyond what is already anticipated under buildout of the General Plan. It is more likely that septic systems would be necessary in rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, where soil conditions are able to accommodate such systems. Projects subject to the AHPO will still be required to comply with regulations applicable to OWTS. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

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	implementation of the General Plan at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. Impacts would be less than significant.	
Greenhouse Gas Emissions		
GHG emissions	<p>Significant and Unavoidable.</p> <p>The General Plan Update EIR concluded that buildout of the General Plan would generate greenhouse gas (GHG) emissions that would have a significant impact on the environment. The General Plan would contribute to global climate change through direct and indirect emissions of GHG from land uses within the unincorporated areas. Impacts from GHG emissions within the unincorporated areas would be significant for long-term growth anticipated under the General Plan. Mitigation Measure GHG-1 as well as the Community Climate Action Plan (CCAP) would reduce impacts from buildout of the General Plan. However, additional statewide measures would be necessary to reduce GHG emissions under the General Plan to meet the long-term GHG reduction goals. Since no additional statewide measures are available, impacts are significant and unavoidable.</p>	<p>Less than Significant</p> <p>Since the release of the General Plan Update, the state has passed Senate Bill 32 (SB 32), which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. However, similar to the General Plan Update, even with the implementation of Mitigation Measure GHG-1 and CCAP measures, additional statewide measures are necessary to meet the long-term GHG reduction goals. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Conflict with applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.	<p>Significant and Unavoidable.</p> <p>To achieve the local goals identified in CARB’s 2008 Scoping Plan, the General Plan included the CCAP which identifies and evaluates feasible and effective policies to reduce GHG emissions. Implementation of the CCAP would be necessary to ensure that the local GHG reduction goals for the County under AB 32 would be met. Adoption and implementation of the CCAP in its entirety would reduce GHG emissions to less than significant levels. However, in the absence of an adopted CCAP, consistency with plans adopted for the purpose of reducing GHG emissions toward the short-term target of AB 32 could be significant. Impacts would be significant and unavoidable.</p>	<p>Less than Significant.</p> <p>Since the adoption of the General Plan in 2015, the state has passed SB 32, which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. The General Plan determined that the CCAP was necessary to meet local goals within the 2008 CARB Scoping Plan to meet AB 32. The AHPO is consistent with the CCAP in promoting housing near transit through the implementation of density bonus. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

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Hazards and Hazardous Materials		
Routine transport, use, or disposal of hazardous materials; Accidental or reasonably foreseeable release of hazardous materials into the environment; Emit hazardous materials in proximity to schools.	Less than Significant. Numerous federal, state and local regulations exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. Implementation of the General Plan would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses would be required to comply with applicable federal, state and local regulations related to hazardous materials. Required compliance with these regulations would ensure impacts related to transport, use and disposal of hazardous materials would be less than significant.	Less than Significant. Handling of hazardous materials in the course of construction would be regulated by existing Health & Safety Code and Fire Code requirements. In some cases, a project level environmental assessment would determine the potential for impacts as well as any required mitigation. Further, affordable housing units demolished and constructed under the AHPO do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the AHPO would not involve the substantial transport, use, and disposal of hazardous materials. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Project that is on a list of hazardous materials site.	Less than Significant. Compliance with applicable existing regulations and processes would ensure that the General Plan would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites.	Less than Significant. Federal and state regulations as well as policies within the Land Use Element of the General Plan would reduce the potential for the public and the environmental to be exposed to hazardous materials from existing site conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Hazards from airports and airstrips.	Less than Significant. Implementation of the General Plan may result in land use designations that allow development within two miles of a public airport, private airstrip, or heliport. However, existing FAA regulations, County policies and regulations, and General Plan goals and policies are intended to identify and properly address potential airport hazards prior to implementation of specific projects within the County.	Less than Significant. AHPO projects could be constructed within two miles of a public airport, private airstrip, or heliport. However, all projects would be subject to existing FAA regulations, County policies and regulations, and General Plan Update goals and policies intended to address potential airport hazards to specific projects. The AHPO would not increase the number of units that are allowed to be built. As such, the AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Impair implementation of emergency response plan.	Less than Significant. Compliance with applicable regulations and implementation of the General Plan goals and policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan is less than significant.	Less than Significant. Disaster routes mapped in the General Plan Safety Element are freeways and highways. Therefore, it is unlikely that a project would be approved that blocks access to the public right of way. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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Wildfire risk.	<p>Less than Significant. The General Plan Update EIR concludes that policies and conditions of approval for future development projects within the County, in addition to compliance with applicable regulations, will minimize impacts related to wildland fires.</p>	<p>Less than Significant. Los Angeles County's Very High Fire Hazard Severity Zones are mostly forest areas, such as the Angeles National Forest and Los Padres National Forest. These forest areas are zoned for watershed, open space, agriculture and a limited amount of low-density residential and rural commercial development. The replacement requirements of the AHPO do not apply within Very High Fire Hazard Severity Zones, a designation that applies to areas where residences are intermixed with wildlands. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Hydrology and Water Quality		
Violate water quality standards or waste discharge requirements.	<p>Less than Significant. The General Plan Update EIR concluded that implementation of the General Plan would comply with water quality standards and waste discharge requirements and would not substantially degrade water quality. Construction projects of one acre or more in area in each of the three Water Board regions (Los Angeles, Lahontan, and Central Valley) would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2012. Projects obtain coverage by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. Impacts would be less than significant upon compliance with regulatory requirements and General Plan policies.</p>	<p>Less than Significant. AHPO projects would be required to develop and implement a SWPPP and BMPs to minimize pollution of runoff. As such, impacts would remain less than significant upon compliance with regulatory requirements and General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Groundwater depletion, interfere with recharge.	<p>Less than Significant. The General Plan Update EIR concluded that development pursuant to the General Plan would interfere with groundwater recharge. Developments in the unincorporated areas of Planning Areas would be mostly limited to redevelopments and reuses of currently developed areas. Thus, redevelopments in those Planning Areas would result in relatively minor increases in impervious areas.</p>	<p>Less than Significant. Any increase in impervious surface as a result of the off-site units constructed as a result of the AHPO would be within the increases analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

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Alter drainage patterns resulting in substantial erosion or siltation.	<p>Less than Significant. The General Plan Update EIR concluded the General Plan would not substantially alter drainage patterns in Los Angeles County and would not result in substantial erosion or siltation. Under the MS4 Permit certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. These requirements would ensure that there would not be a substantial change in drainage patterns in the Los Angeles Water Board Region, Lahontan Water Board Region, and Central Valley Water Board Region. Impacts would be less than significant.</p>	<p>Less than Significant. AHPO projects would be required to mimic predevelopment hydrology, evapotranspiration, and rainfall harvest as required by the MS4 permit. As a result, the AHPO would not create a substantial change in drainage patterns to the Los Angeles Water Board Region, Lahontan Water Board Region, or the Central Valley Water Board Region. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Alter drainage patterns resulting in substantial increase in surface runoff.	<p>Less than Significant. Developments pursuant to the General Plan would not substantially increase runoff rates or volumes and substantial consequent flood hazards would not occur. The General Plan EIR found impacts would be less than significant.</p>	<p>Less than Significant. AHPO projects would be constructed within the Los Angeles and Central Valley Water Board Regions. The MS4 permits in these areas will require the projects to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Any grading or paving would need to comply with LID and NPDES requirements to receive construction permits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Create or contribute runoff water in excess of stormwater drainage systems or otherwise substantially degrade water quality.	<p>Less than Significant. The General Plan Update EIR found impacts related to stormwater drainage and polluted runoff to be less than significant as a result of required compliance with existing regulations (including requirements for Stormwater Pollution Prevention Plans – SWPPP, MS4 and other requirements applicable to the Los Angeles and Lahontan regions).</p>	<p>Less than Significant. The AHPO would not substantially increase units or developed area and would not be expected to substantially contribute to polluted runoff. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Housing in 100-year flood hazard area; Placing structures to 100-year flood hazard area that could impede flood flows.	<p>Less than Significant. The General Plan Update EIR found that forecast housing development could occur within 100-year flood hazard areas. However, development within 100-year flood zones would require improvements to flood control facilities, and issuance of Letters of Map Revision by the Federal Emergency Management Agency (FEMA) showing changes to 100-year flood zones reflecting such improvements; or that the floor beams of the lowest floor of the structure are raised above the 100-year flood elevation. Flood insurance available through the National Flood Insurance Program (NFIP) would also be required.</p>	<p>Less than Significant. If a project subject to the AHPO is constructed within a flood zone, it would be required to improve flood control facilities and issue Letters of Map Revision by FEMA to demonstrate improvement; or construct floor beams raised above the 100-year flood elevations. Additionally, these projects would be required to comply with the County’s municipal code for building with flood-prone areas. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

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	Therefore, buildout of the General Plan would not place substantial numbers of people or structures at risk of flooding in 100-year flood zones, and impacts would be less than significant.	
Flooding.	Less than Significant. The general Plan Update EIR indicates that dam inundation areas span some unincorporated areas of all the County except the South Bay Planning Area; and parts of the Antelope – Fremont Valleys, Santa Clara, San Gabriel River, Santa Monica Bay, Los Angeles River, and San Pedro Channel Islands watersheds. Considering the relatively small proportional net increases in numbers of residents and workers that would be put at potential risk from dam inundation; the operation of most of the dams as flood control dams, not impounding large reservoirs most of the time; and safety requirements and inspections by the Division of Safety of Dams, the General Plan EIR found that impacts would be less than significant.	Less than Significant. As noted in the General Plan Update EIR, there is a relatively small proportional net increase in numbers of residents and workers that would be put in potential risk. Moreover, most of the dams are flood control dams subject to the safety requirements and inspections by the Division of Safety of Dams. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Seiche, tsunami, mudflow.	Less than Significant. As analyzed in the General Plan Update EIR, parts of the County are subject to inundation by seiche, tsunami, or mudflow. Buildout of the General Plan would not subject substantially increased numbers of people or structures to tsunami flood hazards. Therefore, buildout of the General Plan would not subject substantially increased numbers of people or structures subject to tsunami flood hazards. Impacts would be less than significant.	Less than Significant. The presence of a potential landslide hazard will be determined at the project level. The only unincorporated area in a tsunami hazard zone is Marina del Rey, which is already built-out with high-density housing and is subject to the Marina del Rey Local Coastal Program, which contains analysis and policies governing assessment of tsunami and seiche risk. Further, Marina del Rey would not be subject to the AHPO as it has its own affordable housing replacement requirement and mobilehome parks are not a permitted use. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update; EIR no new or greater impacts would occur.
Land Use and Planning		
Potential to physically divide a community.	Less than Significant. The General Plan identifies proposed and planned roadways in Los Angeles County. At a programmatic level, the General Plan does not allow land uses patterns that would result in division of an established neighborhood or community. Although policy maps included in the Land Use and Mobility Elements of the General Plan identify locations for Transit Oriented Districts, highways, and transit projects, these changes and improvements are not anticipated to divide established neighborhoods. Impacts would be less than	Less than Significant. The AHPO requires one-for-one replacement of any lost affordable housing units. Projects subject to the AHPO are anticipated to be generally consistent with the existing zoning and the allowable densities specified in the General Plan Land Use Element and DBO; any proposed zone change would require discretionary action. Any projects that are not consistent with zoning or the General Plan land use designation (and therefore with the potential to disrupt an existing neighborhood) would be subject to the County process for zone changes or General Plan amendments. The AHPO would not substantially

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	significant.	change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Conflict with any applicable land use plan, policy, or regulation.	Less than Significant. The General Plan Update EIR concluded that the General Plan would not conflict with goals contained within SCAG's 2012-2035 RTP/SCS or other land use plans. Therefore, impacts related to compatibility between the General Plan and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant.	Less than Significant. Projects developed under the AHPO would be subject to environmental review for consistency with local land use plans, goals, and policies, some of which may call for more affordable housing. The AHPO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by maintaining the existing supply of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Conflict with any applicable habitat conservation plan.	Less than Significant. The General Plan Update EIR concluded that the General Plan would not conflict with adopted habitat conservation plans. Although buildout of the General Plan would include development and redevelopment in areas covered by conservation plans, such development would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.	Less than Significant. Any AHPO project developed in an area covered by conservation plans would be required to comply with provisions of those plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Mineral Resources		
Loss of availability of mineral resource of value to region or state.	Significant and Unavoidable. The General Plan Update EIR concluded that implementation of the General Plan would cause the loss of availability of a known mineral resource in the Antelope Valley Planning Area but not in the other 10 Planning Areas. No mitigation measures are available that would reduce impacts of buildout from the General Plan are considered infeasible.	Less than Significant. While AHPO projects could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the AHPO are currently in use as mineral extraction. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new greater impacts would occur.
Loss of availability of locally important mineral resource recovery site.	Significant and Unavoidable. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate.	Less than Significant. The AHPO would not affect mineral resource zones or otherwise result in the loss of locally important mineral resources. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Noise and Vibration		
Generation of noise levels in excess of standards	Significant and unavoidable. The General Plan Update EIR found that anticipated development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise	Less than Significant. AHPO projects could generate some construction noise and could expose residents to sources of noise. However, construction activities are subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	<p>environment. Implementation of policies within the General Plan would reduce traffic noise impacts to existing noise sensitive uses to the extent feasible. However, no additional feasible mitigation measures are available to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within Los Angeles County that would be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site traffic noise impacts to existing uses (such as through the construction of sound walls and/or berms) may often be out of proportion with the level of impact. Impacts were found to be significant and unavoidable.</p>	<p>acceptable noise exposure standards for different land use types. The AHPO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. The AHPO could lead to an incremental increase in the size of a project. However, this incremental increase would not generate significant amounts of noise compared to other types of uses. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Traffic associated with development under the AHPO would be within the assumptions made and analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Exposure of persons to or generation of excessive groundborne vibration or noise levels</p>	<p>Significant and Unavoidable. The General Plan Update EIR found that due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts would be significant and unavoidable.</p>	<p>Less than Significant with Mitigation. The AHPO is not anticipated to result in significant generation of groundborne vibration or groundborne noise levels in excess of County standards. AHPO projects are primarily expected to be located in zones that allow housing. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not induce the development of industrial land uses typical of excessive groundborne vibration or groundborne noise levels. However, construction of AHPO projects could result in short-term ground-borne vibration or groundborne noise levels and would be required to implement Mitigation Measure N-4, consistent with the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Permanent increase in ambient noise levels</p>	<p>Significant and Unavoidable. Buildout of the General Plan would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment.</p>	<p>Less than Significant with Mitigation. AHPO projects would generate traffic that could incrementally contribute to elevated noise levels from mobile sources along roadways. To the extent that projects exacerbate impacts such impacts would be considered significant. However, most projects would result in a less than significant contribution to traffic and therefore noise. Projects would be required to implement Mitigation Measure N-2 and are required to achieve interior noise limits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Temporary or periodic increase in ambient noise levels	<p>Significant and Unavoidable. Construction activities associated with any individual development may occur near noise-sensitive receptors and, depending on the project type noise, disturbances may occur for prolonged periods of time. Mitigation Measure N-1 would reduce impacts associated with construction activities to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts construction noise would be significant and unavoidable.</p>	<p>Less than Significant with Mitigation. AHPO projects could generate elevated noise levels from construction activities in some locations. However, the projects would be subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not induce the development of industrial land uses, which tend to generate the most significant noise impacts. Additionally, the projects would be required to implement the General Plan's Mitigation Measure N-1, which would reduce impacts associated with construction activities to the extent feasible. Existing noise levels on sites where projects are most likely to occur is anticipated to be generally urban and in proximity to transit. Noise impacts would be temporary and typical for construction activity, which is allowable in urban areas and therefore reasonably anticipated to occur. In addition, all stationary equipment (primarily anticipated to be HVAC equipment) would be required to comply with county regulations to ensure noise levels do not exceed ambient noise level standards. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Proximity to public or private airport	<p>Less than Significant. The General Plan Update EIR explains that development required to be consistent with any applicable Airport Land Use Compatibility Plan (ALUCP) constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that development would not conflict with airport land use plans. Therefore, future development under the General Plan would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels (and would not exacerbate existing impacts).</p>	<p>Less than Significant. The AHPO would be required to comply with policies included in the Land Use Element and Noise Element of the General Plan to ensure that development would not conflict with airport land use plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
Population and Housing		
Induce population growth.	Less than Significant with Mitigation. Under the General Plan, the Antelope Valley Planning Area would result in a large increase in housing. This would be considered a significant impact without mitigation. Mitigation Measure PH-1 would reduce potential impacts to population and housing to a level that is less than significant.	Less than Significant. The AHPO requires replacement of lost affordable housing units. The AHPO is not anticipated to result in a substantial increase in population as it aims to maintain the existing affordable housing stock in the County. The effects of the AHPO on population growth would be minimal and well within the assumptions of the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Displace housing or people.	Less than Significant. The General Plan Update EIR concluded that existing uses would continue even where new zoning and land use designations are proposed. None of the existing uses would be forced to be removed or relocated as a result of the project implementation. Compliance with the Housing Element would facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate the RHNA and maintain an inventory of housing opportunities sites. Therefore, the General Plan Update EIR found no significant impacts.	Less than Significant. The AHPO requires replacement of lost affordable housing units. The purpose of the AHPO is to preserve the existing affordable housing stock in Los Angeles County. As described in the Project Description, the AHPO would work with other housing related ordinances adopted or under consideration (Inclusionary Housing, Density Bonus, Interim and Supportive Housing) to ensure that new residential projects set aside a percentage of units for affordable housing. The AHPO would not result in displacement of existing housing as it does not incentivize development. Rather, it seeks to alleviate the loss of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Public Services		
Impact to environment based on new government facilities such as fire/emergency stations, police stations, and schools	Less than Significant with Mitigation. To maintain or achieve acceptable service ratios for fire and law enforcement, Mitigation Measures PS-1, PS-2, PS-3, PS-4 would reduce impacts to a less than significant level.	Less than Significant with Mitigation. Projects subject to the AHPO are not expected to increase population beyond what is already anticipated under the General Plan. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by public services. Implementation of Mitigation Measures PS-1, PS-2, PS-3, and PS-4 would reduce impacts to a less than significant level. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Recreation		
Substantial physical deterioration of recreational facilities.	Less than Significant. The General Plan Update EIR indicates that forecast development would generate additional residents that would increase the use of existing parks and recreational facilities such that substantial physical deterioration may occur or be accelerated. According to the General Plan Parks and Recreation Element, the unincorporated	Less than Significant. The AHPO would not induce population growth within the County; rather it would serve the forecast population by maintaining the number of units in the housing stock that are affordable. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by parks and recreation

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	<p>areas face a deficit in local parkland of over 3,719 acres, and nine of the 11 Planning Areas have deficits in regional parkland. The Department of Parks and Recreation’s Parks Needs Assessment, completed in 2016, inventories existing park resources, quantifies the need for additional resources in 188 Los Angeles County sub-areas (cities and unincorporated areas), and estimates the potential cost of meeting that need. Funding from a parcel tax approved in 2016 will be allocated locally according to need by the Regional Parks and Open Space District. Further, the General Plan Update EIR found that policies and programs would assure that funding for parkland acquisition would be proportional to increases in population pursuant to the Quimby Act and that impacts would be less than significant.</p>	<p>facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Require construction of recreational facilities that might have an adverse effect on the environment.</p>	<p>Less than Significant. Goals, policies, and actions in the General Plan including the creation of a County Parks and Recreation Master Plan, a trails program, and Parks Sustainability Program would guide the development of future recreational facilities. Existing federal, state, and local regulations, would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails pursuant to buildout of the General Plan. Furthermore, subsequent environmental review would be required for development of park projects under existing regulations. Consequently, the General Plan Update EIR determined impacts would be less than significant.</p>	<p>Less than Significant. The AHPO would not induce population growth and would add to the affordable housing stock for the County. Projects subject to the AHPO would comply with existing federal, state, and local regulations regarding parks and recreational facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
Transportation and Traffic		
<p>Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; Conflict with an applicable congestion management program.</p>	<p>Significant and Unavoidable. The General Plan Update EIR concludes that buildout of the General Plan would impact levels of service on the existing roadway system. Mitigation Measures T-1 through T-5 would reduce these impacts, however, the impacted locations are still considered to be significant. Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County’s control (e.g., the County cannot undertake</p>	<p>Significant and Unavoidable. The AHPO requires replacement of lost affordable housing units and would preserve existing density in legally established mobilehome parks. The AHPO would not substantially change the location that development would occur; replacement units would be allowed to be constructed off-site only as part of an inclusionary housing requirement and are subject to locational requirements in the Inclusionary Housing Ordinance that are anticipated to result in such development being primarily located in urban areas in proximity to transit. The AHPO would not increase development beyond that evaluated in the General Plan Update EIR. In general, AHPO projects (other than mobilehome parks) are expected to be located in urbanized infill areas. Such areas are often but</p>

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	or require improvements outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans' approval). Therefore, the General Plan Update EIR determined impacts would be significant and unavoidable.	not exclusively in proximity to transit and/or walkable destinations. With respect to mobilehome parks, the proposed preservation of existing legally established parks that exceed current allowable density, would not increase VMT compared to existing conditions. The AHPO would not substantially change traffic impacts (including VMT impacts) as compared to those that would occur under the General Plan Update; no new or greater impacts would occur.
Air Traffic.	Less than Significant. The General Plan is not anticipated to result in the development of a new airport within Los Angeles County nor will it introduce new land uses that could prevent safety hazards to air traffic. Furthermore, policies of the General Plan are aimed at improving the compatibility between aviation facilities and their surroundings, encouraging greater multi-modal access to airports and encouraging the development of a decentralized system of major airports. The General Plan EIR found impacts to be less than significant.	Less than Significant. While the AHPO does not prohibit projects in the vicinity of an airport or flight path, these projects would be limited in number and therefore unlikely to significantly affect flight paths or air travel. All projects in an Airport Influence Area must be reviewed for a consistency determination with the applicable ALUCP. Existing FAA regulations and the ALUCPs and are intended to identify and properly address potential airport hazards prior to implementation of specific projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Design feature.	Less than Significant. The General Plan Update EIR found that there would not be substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The General Plan promotes highways to be built to specific standards that have been set by the County. These include increasing the number of lanes on major highways and other improvements under the Highway Plan. Hazards due to roadway design features will be evaluated on a project-by-project basis. All new highways and upgrades will be planned, designed and built to County standards. The General Plan Update EIR found impacts to be less than significant.	No Impact. Development associated with the AHPO is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The AHPO would not result in changes being made to the local roadways or impede public access on any public right-of-way. Therefore, implementation of the AHPO would have no impact related to design feature hazards. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.
Emergency access.	Less than Significant. The General Plan Update EIR found that development would not result in inadequate emergency access. For projects of sufficient size, discretionary review of emergency access is evaluated on a project-by-project basis. The General Plan Update EIR found that buildout will enhance the capacity of the roadway system by upgrading roadways and intersections when necessary, ensure that the future dedication and acquisitions of roadways are based on projected demand, and	Less than Significant. Any lane closures must be approved by the County and they would not be approved if substantial delays could result. Typically, the County requires a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Compliance with access standards, including the Haul Route Monitoring Program would reduce potential impacts on roadways designated as haul routes and emergency response services during construction of individual projects. The AHPO would not substantially change impacts as compared to those

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	implement the construction of paved crossover points through medians for emergency vehicles. Additionally, the General Plan Update EIR found that the General Plan will facilitate the consideration of the needs for emergency access in transportation planning. The County will maintain a current evacuation plan, ensure that new development is provided with adequate emergency and/or secondary access, including two points of ingress and egress for most subdivisions, require visible street name signage, and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. The General Plan Update EIR determined impacts to be less than significant.	identified in the General Plan Update EIR; no new or greater impacts would occur.
Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	Less than Significant. The General Plan Update EIR found that the General Plan would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). The General Plan supports alternative modes of transportation, including walking and bicycling, to reduce total VMT. Additionally, the General Plan establishes several policies to ensure the safety and mobility of pedestrians and bicyclists. The County will provide safe and convenient access to safe transit, bikeways, and walkways, consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems, provide safe pedestrian connections across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations, adopt consistent standards for implementation of Americans with Disabilities Act requirements and in the development review process prioritize direct pedestrian access between building entrances, sidewalks and transit stops. The General Plan EIR determined impacts would be less than significant.	Less than Significant. Development associated with the AHPO would be consistent with the underlying zoning for the site. Projects would continue to be consistent with General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.
Utilities and Service Systems		
Wastewater treatment requirements.	Less than Significant. According to the General Plan Update EIR, wastewater generation under the General Plan would not exceed wastewater treatment requirements of any of the four Regional Water Quality Control Boards having jurisdiction in Los Angeles County. General Plan implementation Programs	Less than Significant. Development associated with the AHPO would be well within the expected growth for the unincorporated County evaluated in the General Plan Update EIR and would not exceed RWQCB standards for treatment of wastewater or wastewater treatment capacity. Additionally, water conservation practices and compliance with best

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Impact	Level of Significance General Plan Update EIR	Level of Significance AHPO
	<p>require Department of Regional Planning and the Department of Public Works (DPW) to jointly secure sources of funding and to set priorities for preparing studies to assess infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, the County will prepare a Capital Improvement Plan for each of the 11 Planning Areas. Each Capital Improvement Plan shall include a Waste Management Study and Stormwater System Study. General Plan policies also require the County to support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan encourages development, such as Transit Oriented Districts (TODs). Therefore, the General Plan Update EIR found that policies and required regulations would ensure impacts are less than significant.</p>	<p>management practices (i.e., low flow toilets and automatic sinks), as well as Title 24 requirements, are likely to reduce wastewater generation. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>New water or wastewater treatment facilities; stormwater facilities. Determination of capacity.</p>	<p>Less than Significant. The General Plan Update EIR explains that projects are required to pay connection fees to the LACSD, or corresponding types of fees to the City of Los Angeles Bureau of Sanitation, as applicable. Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Antelope Valley and Santa Clarita Valley Planning Areas. The General Plan Update EIR determined there is sufficient wastewater treatment capacity in the remaining Planning Areas and impacts would be less than significant.</p>	<p>Less than Significant. Development associated with the AHPO would not result in a substantial change in the number of housing units; it would simply replace affordable units that are removed from the housing stock. Such development would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing sewer lines and stormwater drainage systems. Development in accordance with the AHPO would be required to comply with all applicable County regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>
<p>Water supply.</p>	<p>Significant and Unavoidable. The General Plan Update EIR concludes that adequate water supplies have been identified in the UWMP's for the County for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the General Plan, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. It is uncertain whether the water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035. Mitigation Measures USS-1 through USS-23 would lower these impacts, however the General Plan Update EIR finds</p>	<p>Less than Significant. Water would be conveyed to projects along existing circulating water mains of varying sizes. Projects associated with the AHPO are anticipated to be generally located on land already developed with residential uses and served by water systems. Projects would be subject to Los Angeles County's Low Impact Development (LID) requirements, Los Angeles County's drought-tolerant landscaping requirements, and CALGreen construction requirements for low flow fixtures and other water conservation features. Development in accordance with the AHPO would be required to comply with water conservation requirements and ensure that adequate infrastructure exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update; EIR no new or greater impacts would occur.</p>

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Impacts to landfills; Comply with applicable regulations regarding solid waste.	<p>that impacts would be significant and unavoidable.</p> <p>Less than Significant. The General Plan Update EIR finds that generation of solid waste would increase as the population increases with buildout of the General Plan. Correspondingly, there would be a need for additional landfill capacity and related support facilities. Both the forecasted net increase in solid waste generation by General Plan buildout and the forecast total solid waste generation in unincorporated County areas at General Plan buildout are well within the total residual per day daily disposal capacity of the nine landfills analyzed in the General Plan Update EIR. The General Plan Update EIR concludes that buildout would not require construction of new or expanded landfills, and impacts are found to be less than significant.</p>	<p>Less than Significant. The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. It is unlikely to result in projects that would significantly impact landfill capacity. As discussed elsewhere in this Addendum, AHPO projects are primarily anticipated to be located in urban areas already served by existing landfills. Projects that obtain planning and building approvals would be consistent with solid waste regulations and would not be expected to generate substantial amounts of solid waste. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.</p>

As shown in the table above, development associated with the AHPO would be consistent with growth assumptions in the General Plan Update EIR. As a result, and as demonstrated in this Addendum, all impacts would be less than or equal to those analyzed in the General Plan Update.

Therefore, as summarized in Table 1-2 and analyzed in more detail in **Chapter 3.0**, the AHPO would not result in 1) substantial changes that require major revisions to the General Plan Update EIR; 2) substantial changes to circumstances, related to significant effects, that require major revisions to the General Plan Update EIR; 3) new information of substantial importance which was not known and could not have been known at the time to General Plan Update EIR was certified. Therefore, the AHPO would not trigger any of the conditions that require the preparation of a subsequent or supplemental EIR under Guidelines sections 15162 and 15163, and therefore an Addendum to the General Plan Update EIR is the appropriate CEQA document to address the AHPO.

1.11 INCORPORATION BY REFERENCE

The following documents were used in the preparation of this Addendum, and are incorporated herein by reference, consistent with Guidelines section 15150:

- Los Angeles County General Plan Update Final Program Environmental Impact Report, certified October 7, 2015.

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- An ordinance amending Title 8 – Consumer Protection, Business and Wage Regulations, Title 21 – Subdivisions, and Title 22 – Planning and Zoning of the Los Angeles County Code to establish an Affordable Housing Preservation Ordinance in the unincorporated areas of Los Angeles County.

The Affordable Housing Preservation Ordinance is available on the County’s website at: <http://planning.lacounty.gov/ahpo>.

The General Plan Update General Plan Update EIR is available for review at the County of Los Angeles, Department of Regional Planning, 320 W. Temple Street, Room 1356, Los Angeles, CA 90012 and on-line:

- Draft PEIR: http://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf
- Final PEIR: http://planning.lacounty.gov/assets/upl/project/gp_2035_lac-gpu-final-eir-final.pdf

2.0 PROJECT DESCRIPTION

2.1 LOS ANGELES COUNTY GENERAL PLAN UPDATE PEIR

As noted in **Chapter 1.0, Introduction**, the Los Angeles General Plan Update is the project analyzed in the Los Angeles County General Plan Update EIR (General Plan Update EIR).¹

Encompassing approximately 4,083 square miles, Los Angeles County is geographically one of the largest counties in the country. It stretches along 75 miles of the Pacific Coast of Southern California and is bordered by Orange County to the southeast, San Bernardino County to the east, Kern County to the north, and Ventura County to the west. It also includes two offshore islands, Santa Catalina Island and San Clemente Island. The regional location of Los Angeles County is shown in **Figure 2-1, Regional Vicinity**.

The area for the proposed project includes only the unincorporated areas of Los Angeles County (unincorporated areas), approximately 65 percent of the total land area in Los Angeles County fall within the unincorporated areas. The unincorporated areas in the northern portion of Los Angeles County are covered by large amounts of sparsely populated land and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of Los Angeles County consist of noncontiguous land areas, which are often referred to as Los Angeles County's "unincorporated urban islands." These unincorporated areas are shown in **Figure 2-2, Unincorporated Areas of Los Angeles County**.

Zoning is the key tool used to implement land use policies related to the use of land, buildings, location and form of structures. Zoning regulations are generally intended to guide the development of the unincorporated areas in an orderly manner, based on the adopted general plan, to protect and enhance the quality of the natural and built environment, and to promote the public health, safety, and general welfare.

The General Plan Update was a comprehensive update to the County's General Plan. The purpose of the General Plan is to guide growth and development within the unincorporated areas. As part of the 2015 Update, several elements to the General Plan were revised, combined, and otherwise reorganized. The General Plan Update also included minor amendments to the County Code related to Significant Ecological SEA Ordinance, Hillside Management Area HMA Ordinance, amendments to the MXD zone, and amendments to a number of other zones, as well as adoption of the Community Climate Action Plan (CCAP).

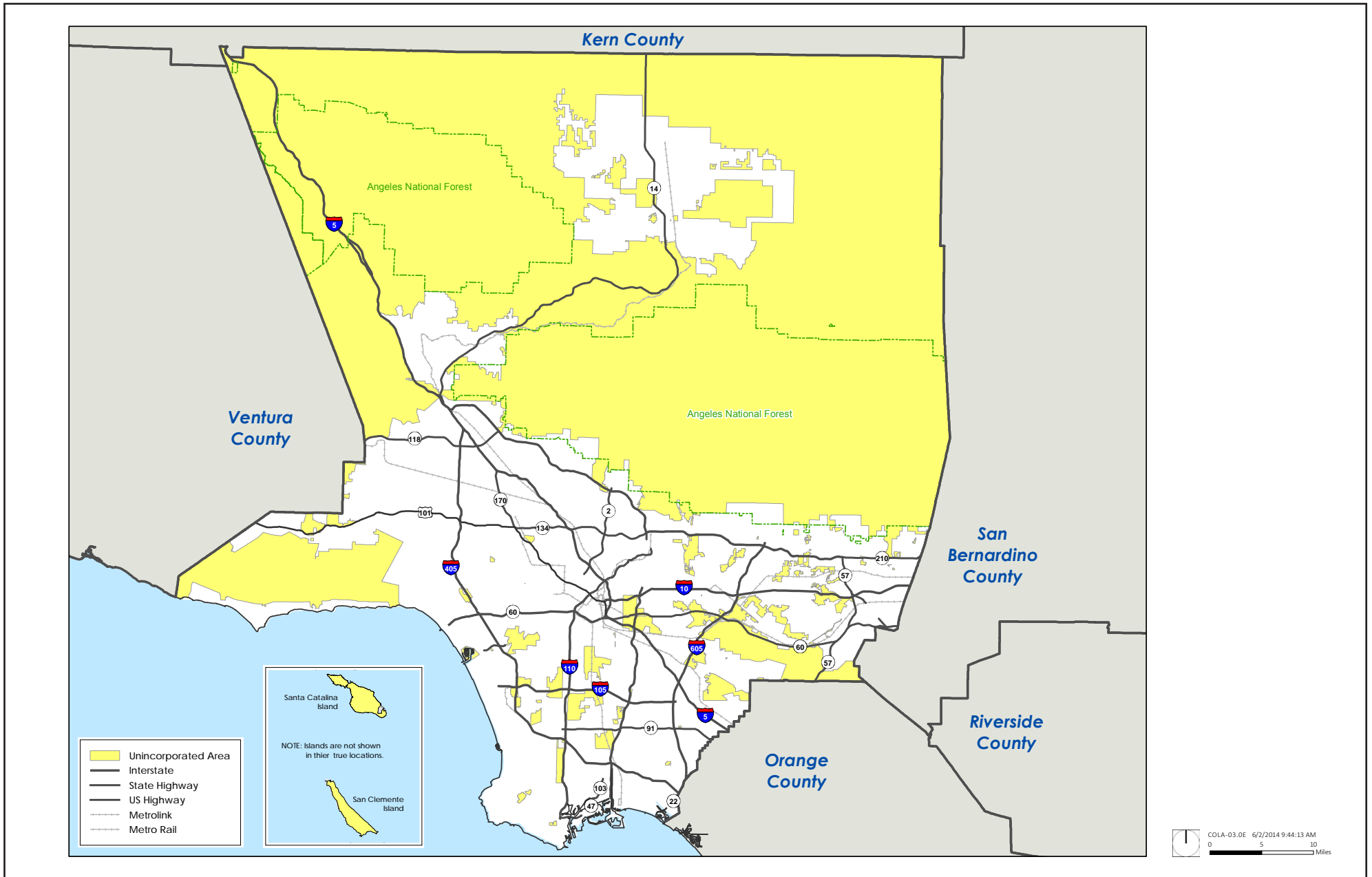
¹ Los Angeles County, General Plan 2035 Programmatic EIR, Certified October 6, 2015 available at: <http://planning.lacounty.gov/generalplan/eir>



SOURCE: Placeworks, 2014; ESRI, 2014

FIGURE 2-1

Regional Vicinity



SOURCE: Placeworks, DRP, 2013

FIGURE 2-2

Unincorporated Areas of Los Angeles County

One major policy was to encourage more preservation of existing affordable housing stock. The Housing Element of the General Plan includes a program to preserve 582 “at-risk” units for low income households between 2014 to 2024. Units are considered “at risk” if they have the potential to convert to market-rate housing. Preventing the conversion of affordable housing to market-rate units will help maintain the rental housing stock for extremely low-income to moderate-income households.

The purpose of the Affordable Housing Preservation Ordinance (AHPO) is to preserve the supply of affordable housing and require affordability of replacement dwelling units.

The General Plan Update EIR identifies and analyzes projections for population, households, and employment (post 2035). As shown in **Table 2-1** below, buildout of the General Plan would result in 358,930 additional residential dwelling units compared to existing land uses. Most of the new development is expected to occur in the Antelope Valley Planning Area, which will accommodate about 70.6 percent of new residential units and 76 percent of the population growth.

Table 2-1
General Plan Residential Buildout Projections (by Planning Area)

Planning Area	Existing (2013)		Proposed Project Buildout (Post 2035)	
	Units	Population	Units	Population
Antelope Valley Planning Area	24,739	93,490	278,158	1,070,571
Coastal Islands Planning Area	44	158	21	0
East San Gabriel Valley Planning Area	63,835	239,218	70,097	255,952
Gateway Planning Area	28,743	104,061	34,446	120,358
Metro Planning Area	73,068	235,990	92,158	301,073
San Fernando Valley Planning Area	9,039	32,488	13,464	47,060
Santa Clarita Valley Planning Area	28,501	104,116	77,155	237,638
Santa Monica Mountains Planning Area	5,703	21,757	6,788	26,128
South Bay Planning Area	19,952	69,474	25,929	86,392
West San Gabriel Valley Planning Area	34,765	125,736	43,877	156,685
Westside Planning Area	12,099	39,926	17,316	55,033
Total	300,478	1,066,414	659,409	2,356,890
Increase Over Existing			358,931	1,290,476

Source: General Plan 2035 EIR, Table 3-7

2.2 BACKGROUND

As identified in the Los Angeles County Affordable Housing Action Plan, the County is confronting a housing crisis.² A 2020 report by California Housing Partnership found that 509,404 low-income renter households in the county do not have access to an affordable home, and 79 percent of extremely low-income households are paying more than half their income on housing costs. Wages have not kept pace with the cost of housing—renters in Los Angeles County need to earn \$41.96 per hour, or 2.8 times the minimum wage, to afford the average monthly rent of a two-bedroom apartment.³

Housing need in Los Angeles County is expected to continue to rise with projected population growth. Projected County population growth translates into a Regional Housing Needs Assessment (RHNA) for the County’s unincorporated areas for the 2014-2021 Housing Element planning period of 27,440 units.⁴ **Table 2-2** shows the breakdown of the RHNA allocation by Area Median Income (AMI) income categories. As of the end of 2019, 21,283 units are needed by October 2021 in order to meet housing needs in the unincorporated areas of Los Angeles County. Given past annual performance, the County is well short of being on-track to meet this number.

Table 2-2
Los Angeles County Unincorporated Areas RHNA Progress/Building Permit Activity

Income Level	RHNA Allocation by Income Level	2014	2015	2016	2017	2018	2019	2020	2021	Total Units to Date	Total Remaining RHNA
		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8		
Extremely Low/ Very Low	7,404	159	32	35	354	38	54			672	6,732
Lower	4,281	0	0	0	108	14	107			229	4,052
Moderate	4,930	0	0	0	0	19	0			19	4,911
Above Moderate	10,825	513	1,790	620	622	563	1,130			5,237	5,588
Total RHNA	27,440	672	1,822	655	1,084	634	1,291			6,157	21,283

Source: County of Los Angeles Housing Permit Data, Housing Section, 2020

- ² Los Angeles County Department of Regional Planning (January 2018) Los Angeles County Affordable Housing Action Plan. http://planning.lacounty.gov/assets/upl/project/housing_la_ahap_action-plan.pdf
- ³ California Housing Partnership. Los Angeles County 2020 Affordable Housing Needs Report (May 2020). Available online at: https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2020/06/Los_Angeles_Housing_Needs_Report_2020-HNR.pdf, accessed June 16, 2020.
- ⁴ The County’s RHNA for the 2014-2021 planning period is 30,145 units, but it has been adjusted to account for annexations that have occurred to date.

Table 2-2 shows the County’s progress in meeting its RHNA through residential building permit activity. SCAG recently released draft RHNA numbers for the 2021-2029 housing element planning period, and the County has an even higher target of nearly 90,000 units. As shown in **Table 2-2**, the County is not producing enough affordable housing to adequately serve the need.

In response to the local and statewide housing crisis, the County is working to increase housing choice, affordability and livability in the unincorporated areas. One piece of the County’s overall plan is the proposed AHPO. The Los Angeles County Affordable Housing Action Plan recommended a multi-pronged approach to addressing the need to stabilize and preserve affordable housing. These strategies include: limiting the conversion of rental housing to market-rate condominiums, establishing a funding program for naturally occurring affordable housing (NOAH) units, and requiring a one-for-one replacement of any affordable units that are demolished or removed.

In June 2020, DRP staff developed a Public Hearing Draft AHPO, which contains the following policies:

- No net loss: requires one-to-one replacement of rental units occupied by extremely low, very low, lower or moderate income households within the previous five years that are demolished, vacated or converted from rental to for-sale. The replacement units must be deed-restricted to ensure affordability to extremely low, very low, lower or moderate income residents. Alternatives include on-site or off-site replacement, or payment of a replacement fee. Off-site replacement would only be allowed if replacement is provided as part of an inclusionary housing project that does not use a density bonus (few such projects are anticipated to occur).
- Condominium conversions: requires notification to organizations qualified to preserve affordable rental housing prior to submitting an application to convert rental housing to condominiums.
- Mobilehome park preservation: preserve mobilehome parks as a viable lower-cost housing option by clarifying and streamlining requirements to their establishment and continued operation. (Many mobilehome parks predate the current zoning code.).

Preservation of existing units typically costs one-half to two-thirds less than new construction while also allowing low-income tenants to remain in place.⁵

2.3 PROJECT CHARACTERISTICS

⁵ Los Angeles County Department of Regional Planning (January 2018) Los Angeles County Affordable Housing Action Plan. http://planning.lacounty.gov/assets/upl/project/housing_la_ahap_action-plan.pdf

The AHPO seeks to preserve the supply of affordable housing and require affordability of replacement dwelling units. The AHPO incorporates requirements of State Density Bonus Law and the County’s Density Bonus Ordinance relative to replacement of units. The AHPO also incorporates the requirements of California Government Code Section 66300 which requires replacement of rent stabilized units that were withdrawn from the rental market within the last 10 years.⁶ In addition, AHPO requires replacement of units that are/were covenanted for, or occupied by, extremely low income households within the last 5 years; and units that are/were covenanted for moderate-income households within the last 5 years (if incomes in non-covenanted units are unknown, then the assumption is to be based on Census data regarding the income level of households in the jurisdiction).

The AHPO considers a variety of strategies, including the regulation of condominium conversions, one-for-one replacement or “no net loss” policies, on and off-site replacement options (with certain limitations) and replacement fees. The ordinance includes three primary components: replacement of affordable units, condominium conversions, and mobilehome parks.

The AHPO does not identify specific development projects or specific locations for development.

Applicability. The ordinance applies to new construction of any principal building (residential or non-); a change of principal residential use to another principal use; a change in the number of dwelling units; a land division; and legalization of an existing unpermitted dwelling unit.

Replacement Fee. Payment of a replacement fee would be allowed for projects that cannot provide rental units on site because they are: 1) non-residential projects; or 2) condo conversions/subdivisions with no increase in units that must replace lower-income rental.

Replacement of Affordable Units. The AHPO requires one for one replacement of any affordable units that will be lost, or were recently lost, due to demolition, vacation, or conversion from rental to for-sale. Replacement units must be affordable to households at the incomes of the households that were displaced, as specified within the ordinance. The number of replacement units required is to be determined in accordance with Section 65915 of the California Government Code at the affordability levels determined therein. The ordinance applies the methodology from Section 65915 to the replacement of units occupied by extremely low-income households. Each replacement unit is to have at least the same number of bedrooms as the unit being replaced. The affordability term for rental replacement units is to be at least 99 years from the time of building permit issuance. The initial sale of for-sale units is to be restricted to eligible buyers and require an equity-sharing agreement with the County. Replacement units would generally be

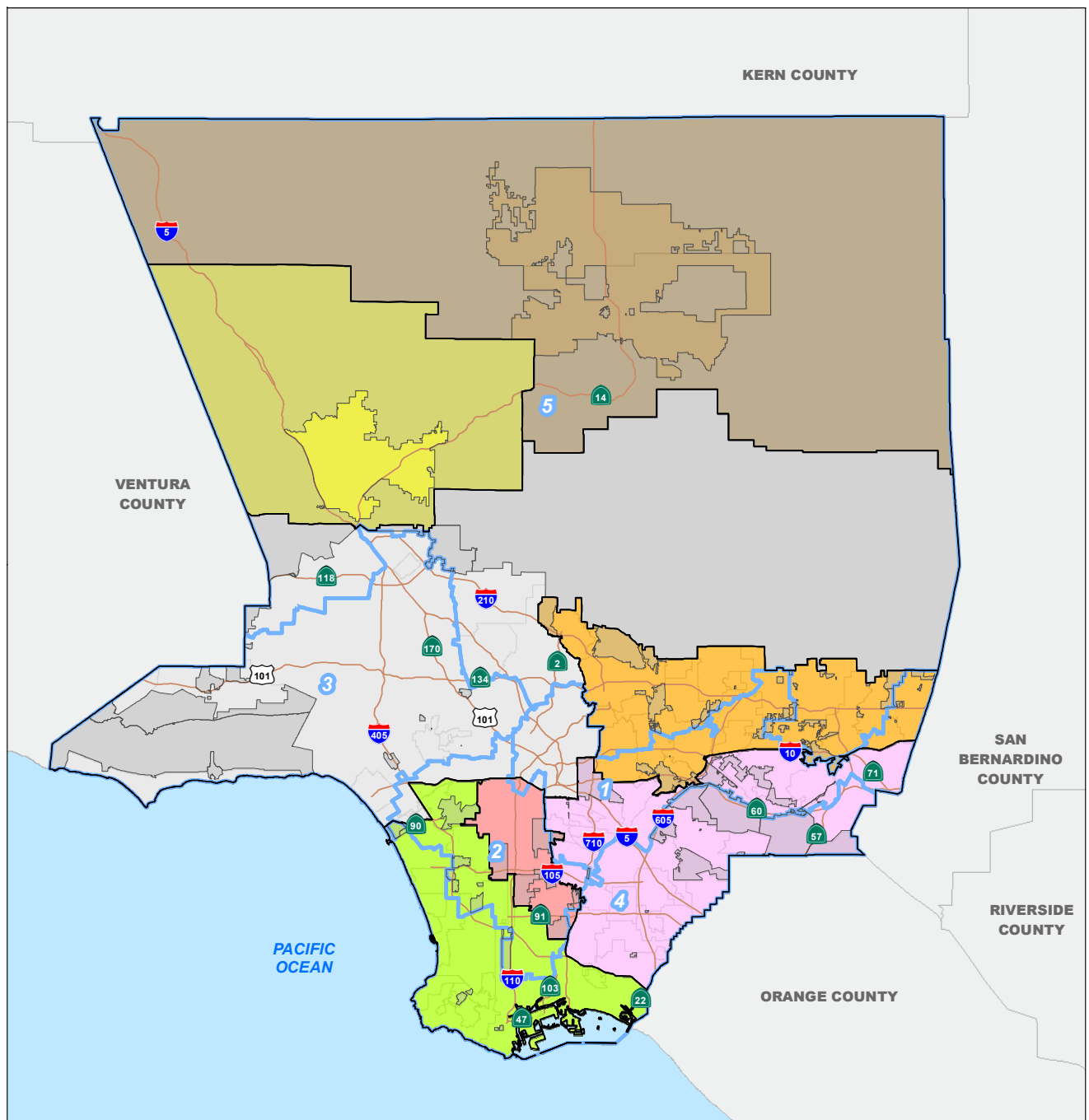
⁶ Government Code §66300(d)(2)(E)(ii)(IV)

required to be provided on-site as part of the new project. Replacement units could be provided through construction of units off-site if the following conditions are met: 1) the affordable replacement units count toward the affordable housing set-aside units required in the Draft Inclusionary Housing Ordinance, and the project does not utilize a density bonus;⁷ and 2) the construction of such units does not result in units requiring replacement pursuant to the AHPO.

Condominium Conversions. Converting rental units to market-rate condominiums decreases the overall rental housing stock and causes potential displacement of current tenants. The AHPO would require the replacement of apartment units converted to condos if any of the following conditions apply: 1) the apartment is subject to rent restrictions by covenant for households of moderate, lower, very low, or extremely low income within five years prior to application submittal; 2) the apartment is rent-stabilized within the five years prior to application submittal; 3) the apartment is occupied by lower, very low, or extremely low income households within the five years prior to application submittal; or 4) the apartment is rent-stabilized and withdrawn from rent or lease within the 10 years prior to application submittal. If incomes in non-covenanted units are unknown, Census data may be used to reasonably assume incomes for low income, very low income, or extremely low-income households in the jurisdiction.

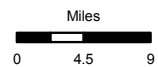
Mobilehome Parks. There are currently 85 mobilehome parks in the unincorporated portions of the County. These mobilehome parks are in both urban and rural parts of the County. Provisions within the AHPO would clarify the process for mobilehome parks to modify density and allow existing legal nonconforming mobilehome parks that exceed current permitted density to use a density bonus to establish their existing density as the maximum allowed. Development standards for mobilehome parks could be modified through a CUP without also requiring a variance.

⁷ Off-site housing must meet inclusionary housing ordinance locational requirements that sites must be located in an unincorporated area of Los Angeles County and be one of the following: within one-quarter mile of the principal project; ~~located within a Highest, High, or Moderate Resource Area, as determined by the State Tax Credit Allocation Committee and State Department of Housing and Community Development; located within two miles of the principal project and in an area with known displacement risk based on evidence to the satisfaction of the Department;~~ or developed as part of a community land trust. In addition, the off-site parcel, with its developable acreage, zoning and General Plan land use designation, must be sufficient to permit the construction of the required set-aside units for the principal project. .



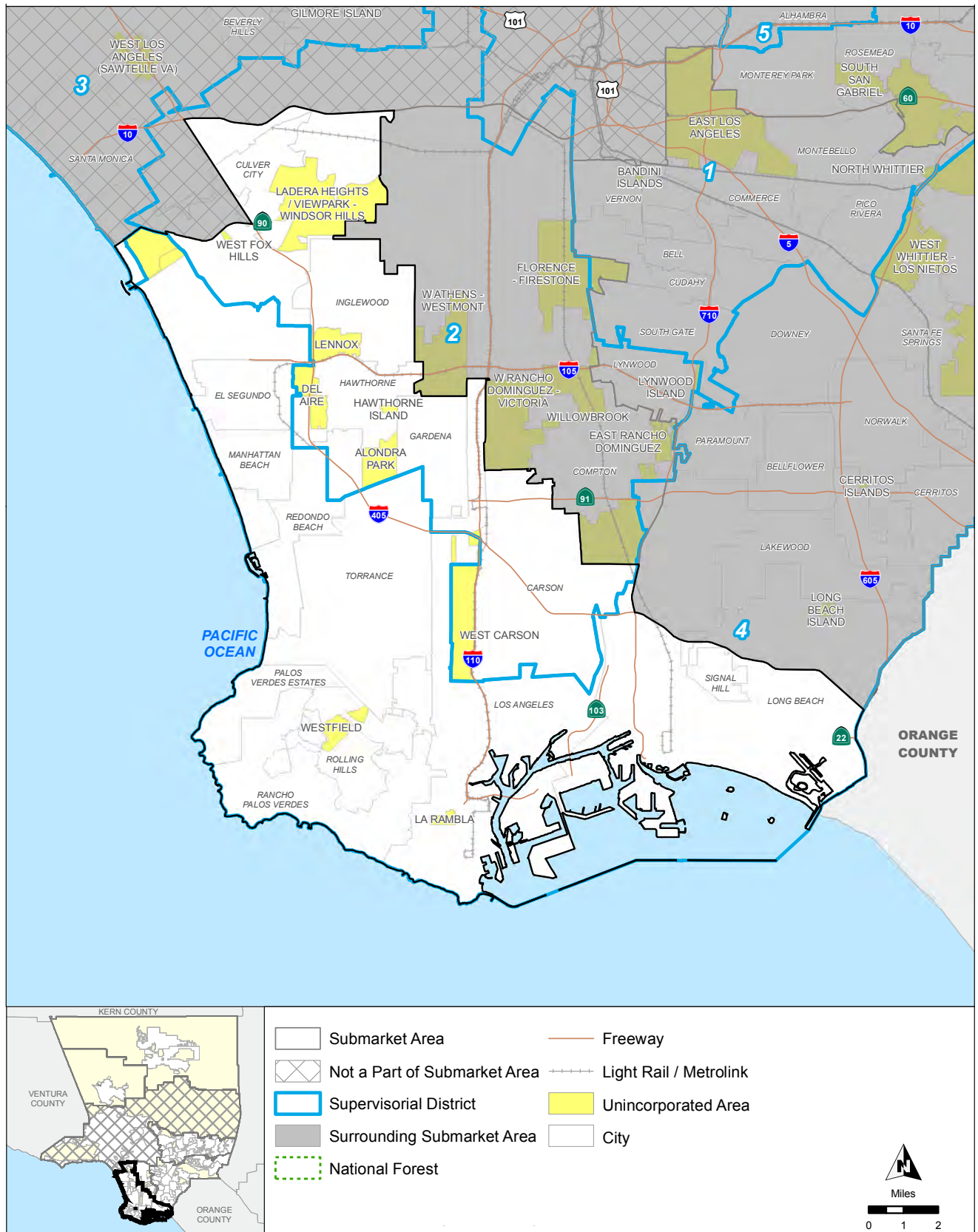
- | | | |
|----------------------------|-------------------------|------------------------|
| Antelope Valley | Not a Part of Submarket | South Los Angeles |
| Coastal South Los Angeles | San Gabriel Valley | Supervisorial District |
| East Los Angeles / Gateway | Santa Clarita Valley | Unincorporated Areas* |

* Unincorporated areas are a transparent gray and come out as a darker color tone on the map



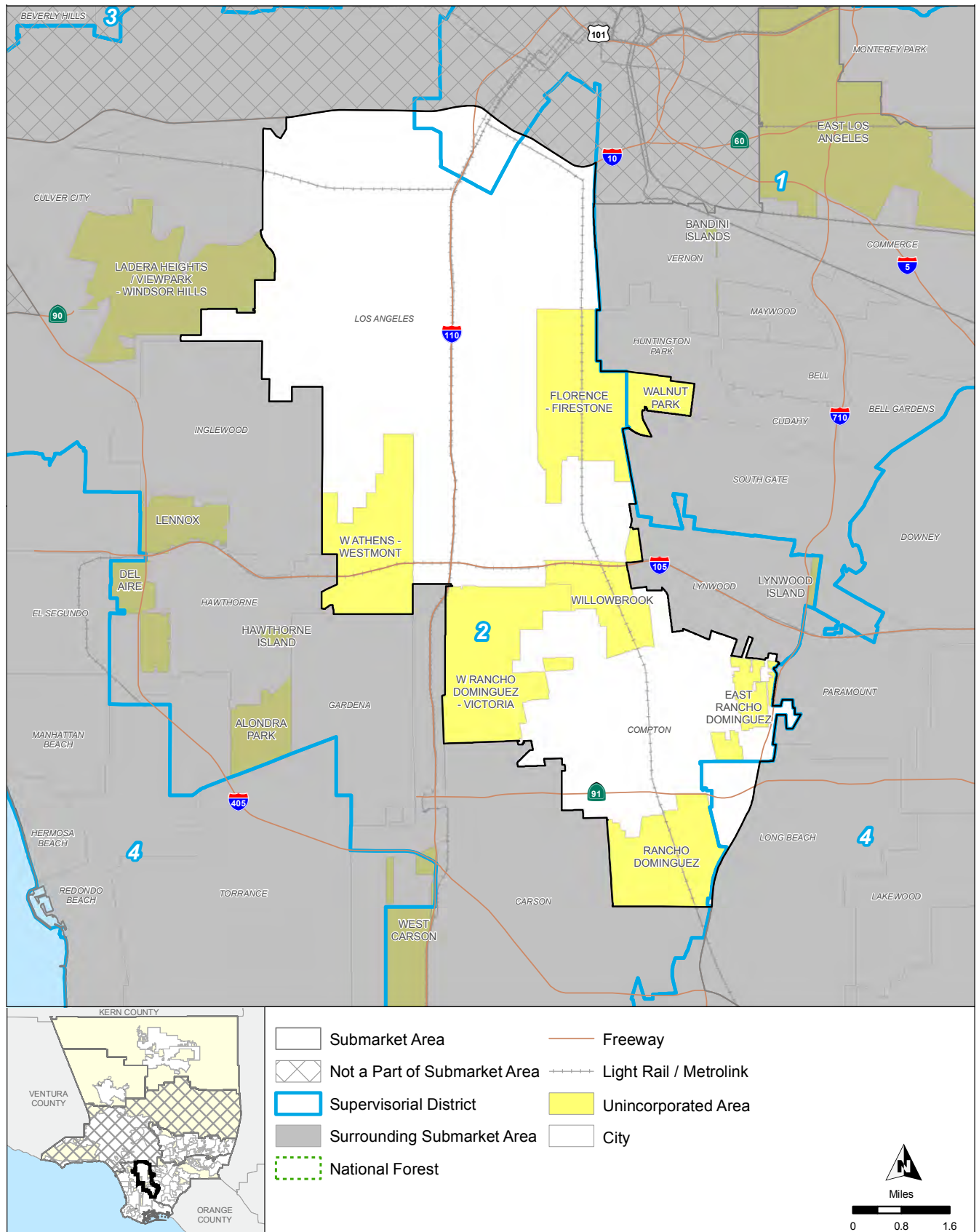
SOURCE: Department of Regional Planning & KMA, 2017

FIGURE 2-3



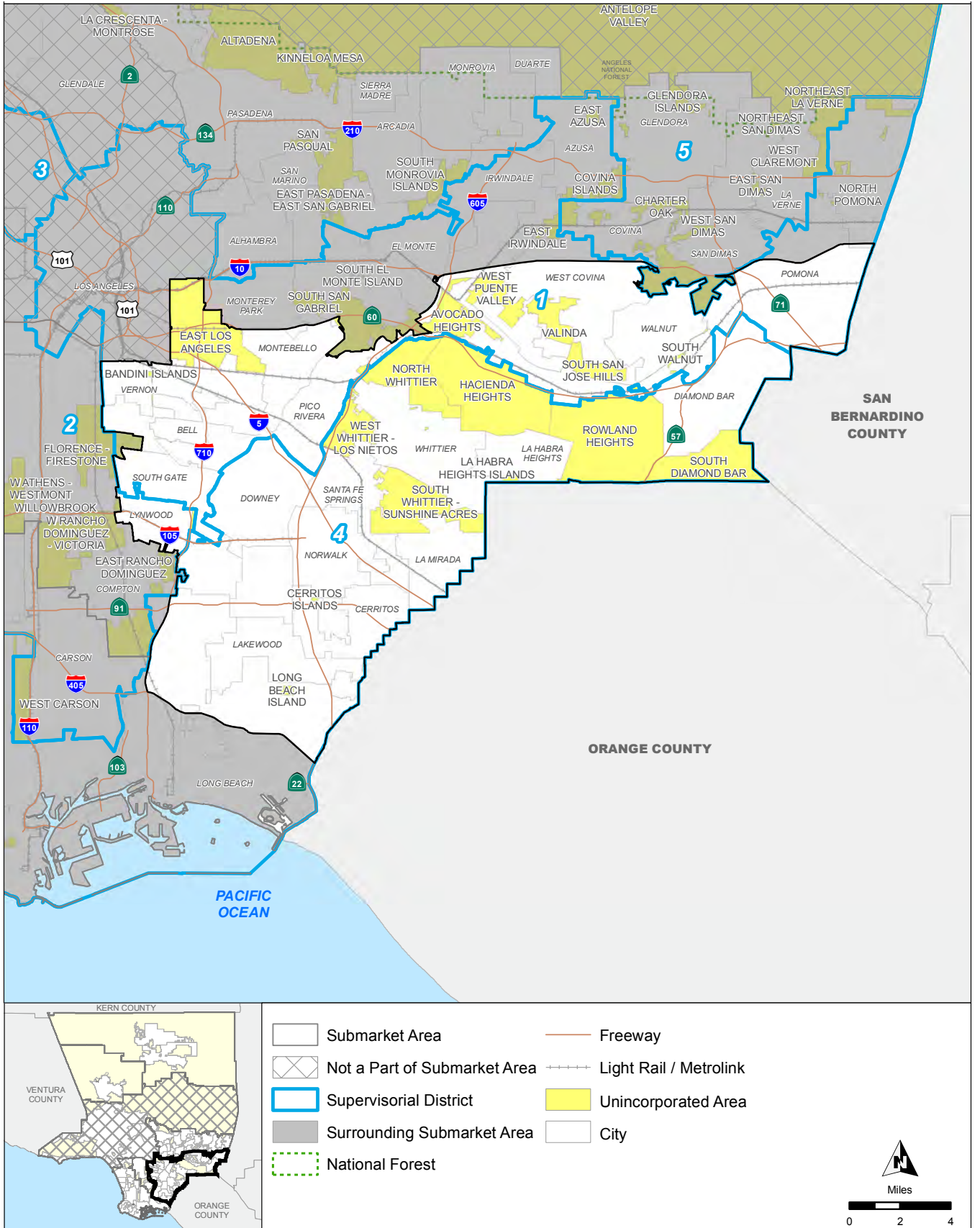
SOURCE: Department of Regional Planning & KMA, 2017

FIGURE 2-4



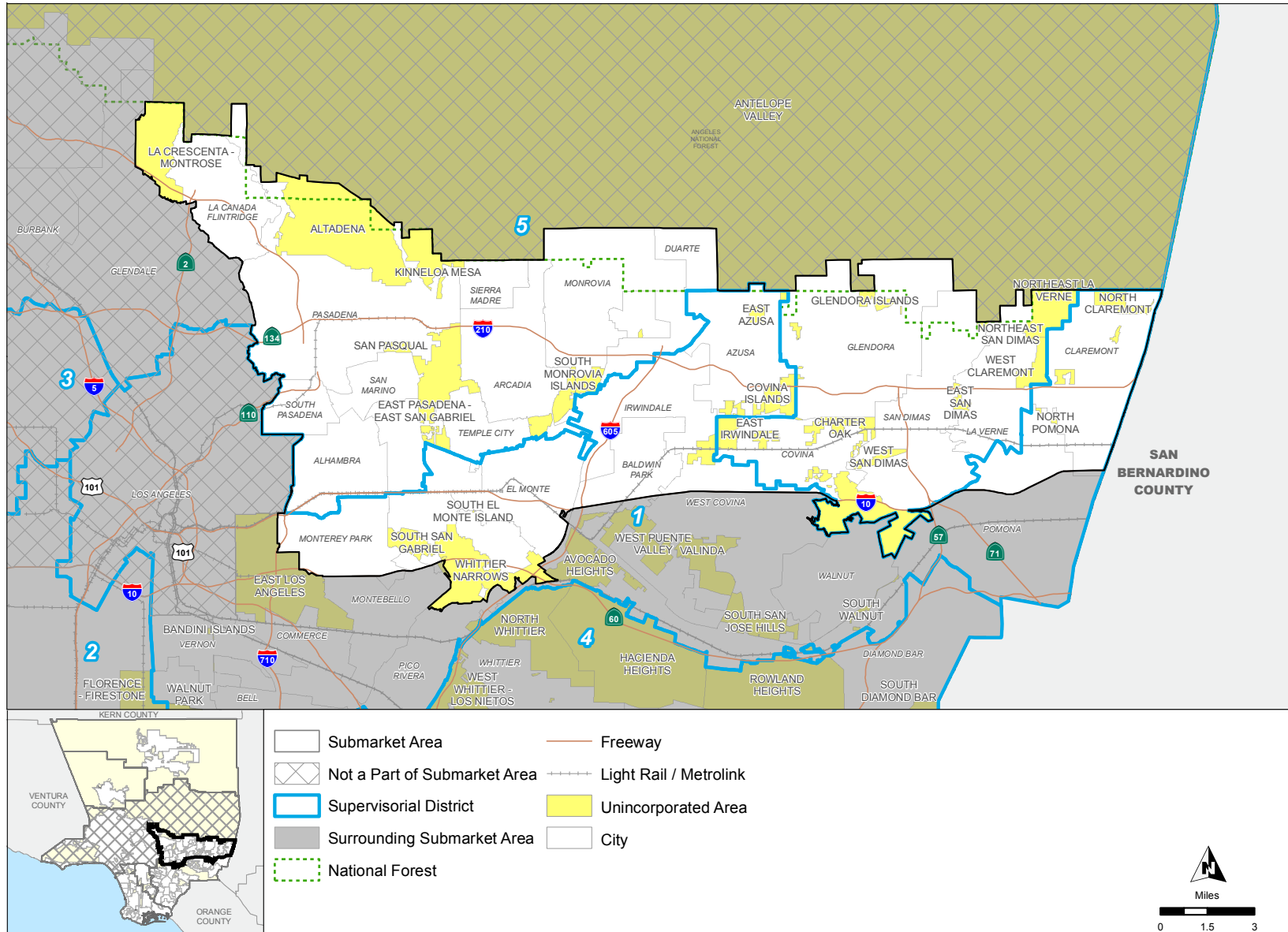
SOURCE: Department of Regional Planning & KMA, 2017

FIGURE 2-5



SOURCE: Department of Regional Planning & KMA, 2017

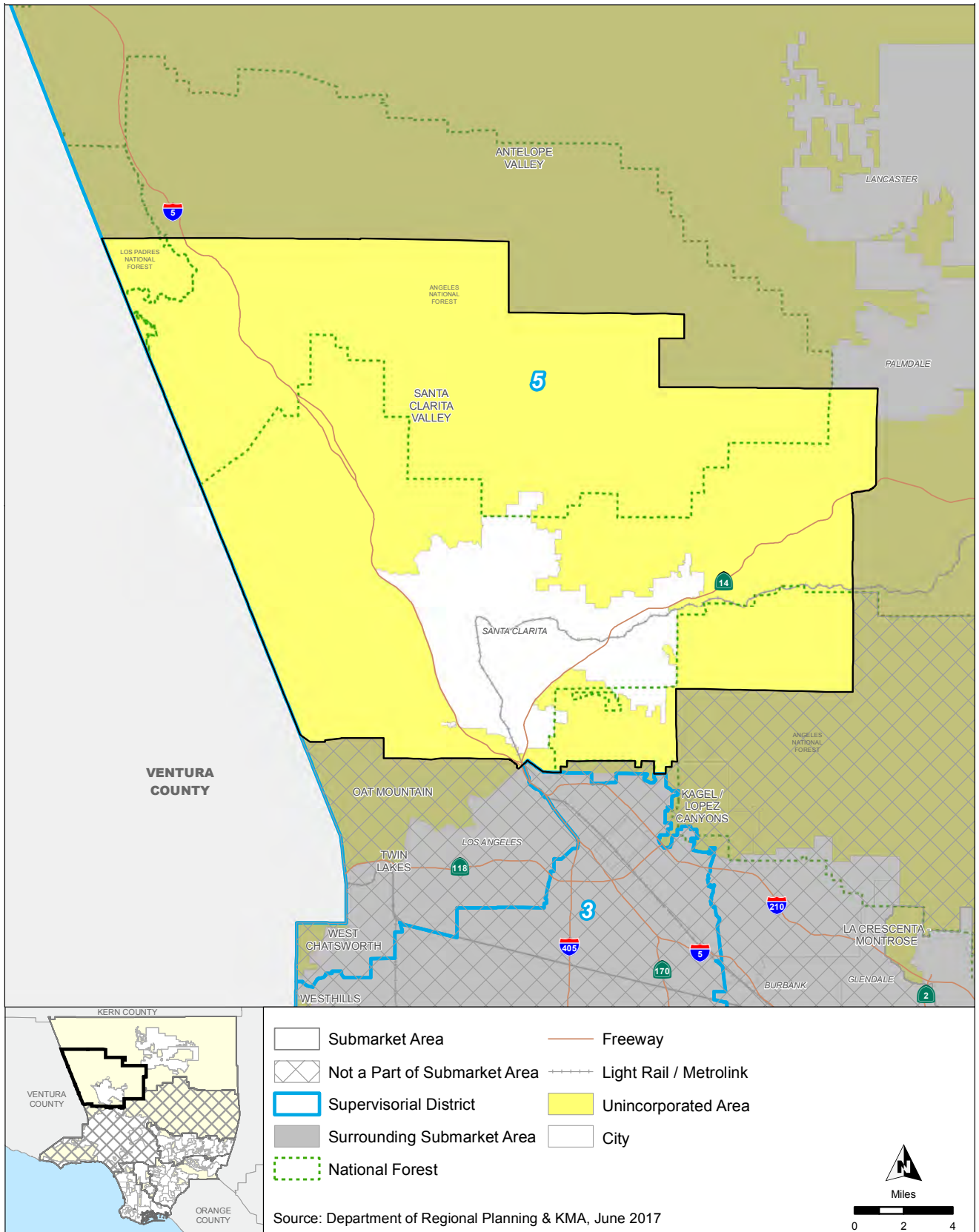
FIGURE 2-6



SOURCE: Department of Regional Planning, KMA, 2017

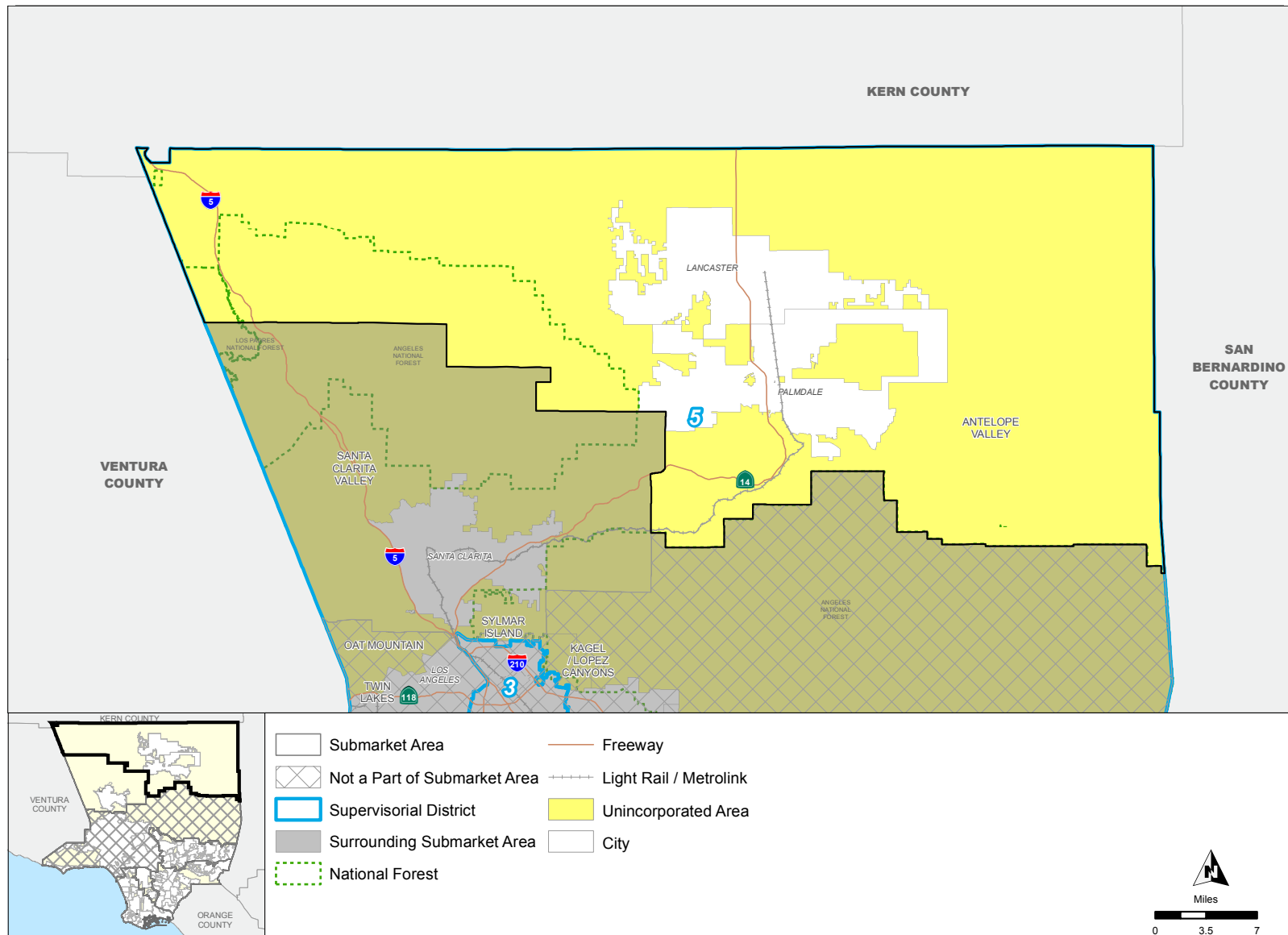
FIGURE 2-7

San Gabriel Valley Submarket Area



SOURCE: Department of Regional Planning & KMA, 2017

FIGURE 2-8



SOURCE: Department of Regional Planning, KMA, 2017

FIGURE 2-9

Antelope Valley Submarket Area

The AHPO also allows for in-lieu payment of fees and certain exemptions.

Affordable Housing Replacement Fees – Submarket Areas. Given the geographic, social, and economic diversity of the unincorporated areas, submarket areas were identified based on similar land use, real estate markets, and development activities. The boundaries of each submarket area were identified to ensure that unincorporated areas were entirely located within one submarket area. The submarket areas are as follows and shown in **Figures 2-3** through **2-9**.

- Antelope Valley
- East Los Angeles/Gateway
- Santa Clarita Valley
- Coastal South Los Angeles
- Santa Gabriel Valley
- South Los Angeles

The AHPO uses the boundaries of submarket areas to determine replacement fee payments (as shown in **Table 2-3**) for eligible projects.

Table 2-3
Affordable Housing Replacement Fees

Submarket Area	Fee Per Square Foot of Gross Building Area	Fee Per Unit
Antelope Valley	\$144	\$129,470
Coastal South Los Angeles	\$346	\$318,914
East Los Angeles/Gateway	\$270	\$228,116
San Gabriel Valley	\$268	\$292,277
Santa Clarita Valley	\$174	\$154,294

Source:
Los Angeles County Draft Affordable Housing Preservation Ordinance, Table 22.246.090-A

Projects eligible to pay a fee would be: 1) non-residential projects, and 2) land divisions that have no increase in units and is required to provide replacement rental units.

The replacement fee would be calculated per square foot multiplied by the gross floor area of the units requiring replacement. A per-unit fee applies if the square footage is not known.

Exemptions to the Replacement Provisions of the AHPO. Certain projects are exempt from the replacement requirements of the AHPO. Construction of one principal single-family home, construction or legalization of accessory dwelling units (ADUs) or junior accessory dwelling units (JADUs), projects located in a Very High Fire Hazard Severity Zone or in a Specific Plan area subject to an affordable housing replacement requirement, conversion to resident ownership of all rented spaces in a mobilehome park; addition of mobilehome spaces or mobilehomes in a mobilehome park; and a lease project as defined in Section 21.08.090 in Title 21 (Subdivisions) of the County Code are exempt from replacement requirements.

2.4 PROJECT OBJECTIVES

The objective of the project is to preserve the supply of affordable housing and require affordability of replacement dwelling units to maintain the existing housing stock for extremely low-income to moderate-income households.

2.5 DISCRETIONARY ACTIONS AND APPROVALS

The following actions by the County of Los Angeles will be required in order to implement the AHPO:

- Approval of this Affordable Housing Preservation Project Addendum, and
- Adoption of the Proposed Ordinance to add Chapter 22.119, Chapter 22.268, Section 22.02.055, Section 22.120.075, Section 22.140.680 and amend County Code Sections 21.40.110, 21.44.050, 22.14.010, 22.14.030, 22.14.130, 22.22.030, 22.120.040, 22.120.090, 22.140.370, 22.140.490, 22.166.040, 22.166.070, 22.166.080, 22.172.050, 22.246.020, 22.250.010, 22.250.020 (AHPO would also amend sections that are proposed in the Inclusionary Housing Ordinance and Interim and Supportive Housing Ordinance – 22.121.050.C and 22.128.050).

3.0 ENVIRONMENTAL ANALYSIS

This Section of the Addendum provides an analysis of each environmental factor identified in the General Plan Update EIR to determine whether new or more severe environmental effects could occur from the implementation of the Affordable Housing Preservation Ordinance (AHPO) and whether mitigation measures identified in the General Plan Update EIR would be needed and/or if additional mitigation could be necessary.

In the following evaluation, each topic section includes the following sub-sections:

- **Environmental Checklist.** Contains a modified form of the Appendix G Initial Study environmental checklist. The checklist follows the topic areas as addressed in the General Plan Update EIR. In addition, each checklist question has been modified to address Guidelines § 15162 to allow for yes or no answers to the following questions with respect to each Appendix G factor:
 - Would there be a new significant environmental effect caused by a change in the project or circumstances?
 - Would there be a substantial increase in the severity of a previously identified significant effect caused by a change in the project or circumstances?
 - Is there the potential for substantially more severe significant impacts as a result of new information?
 - Is there the ability to substantially reduce a significant effect as a result of new information but declined by the proponent (the County)?
- The analysis presented for each Appendix G factor identifies the level of impact identified for the General Plan Update EIR and the level of impact anticipated for the Affordable Housing Preservation Ordinance.
- Any change in circumstances or new information relevant to each factor is identified as applicable.
- For each factor, the analysis indicates that impacts would be similar to or less than those identified in the General Plan Update EIR and therefore a Subsequent or Supplemental EIR is not required, and an Addendum is appropriate based on the analysis contained in this Addendum.

3.1 AESTHETICS

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to impacts on scenic vistas?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

A scenic vista is generally defined as an expansive view of highly valued landscape or other important scenic features as observable from a publicly accessible vantage point. The diverse landscape of unincorporated areas contains many scenic vistas, including portions of Mulholland Highway, Las Virgenes Road, Malibu Canyon Road, Topanga Canyon Boulevard and Angeles Crest Highway, which are adopted Scenic Highways.

The General Plan Update EIR analyzed potential impacts on scenic vistas and corridors. The General Plan Update EIR found that due to both the broad definition of scenic viewsheds and the substantial amount of new development that would be accommodated by the General Plan Update and associated changes to the Zoning Ordinance, the potential for a substantial adverse impact to a scenic vista could exist. However, the existing regulatory setting, as well as the goals and policies contained in the General Plan Update, would serve to lessen potential impacts to scenic vistas. Additionally, approval of the General Plan Update does not authorize construction of development that would affect scenic vistas. Therefore, under the General Plan Update EIR, impacts were found to be less than significant, and no mitigation measures were required.

Because the AHPO generally requires replacement of affordable units on a one-to one- basis, it is not anticipated to substantially change the location that development would occur. For inclusionary projects, the ordinance would allow for offsite replacement in unincorporated Los Angeles County that meets the locational requirements set out for inclusionary projects (off-site replacement would only be allowed for inclusionary housing projects that do not use a density bonus).¹ Minor infrastructure repair and/or

¹ Off-site housing must meet inclusionary housing ordinance locational requirements that sites must be located in an unincorporated area of Los Angeles County and be one of the following: within one-quarter mile of the principal project; ~~located within a Highest, High, or Moderate Resource Area, as determined by the State Tax Credit Allocation Committee and State Department of Housing and Community Development; located within two miles of the principal project and in an area with known displacement risk based on evidence to the satisfaction of the Department;~~ or developed as part of a community land trust. In addition, the off-site parcel, with its developable acreage, zoning and General Plan land use designation, must be sufficient to permit the construction of the required set-aside units for the principal project.

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replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not increase development compared to what was analyzed in the General Plan Update EIR. Units would not be constructed as a result of the AHPO beyond what is already existing. Some impingement of views of scenic resources could occur as a result of the AHPO (either due to development in a new location or added massing to a proposed development), but overall impacts are anticipated to be less than significant. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to damage to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There are four adopted state scenic highways in the County: Angeles Crest Highway (SR-2), from 2.7 miles north of I-210 to the San Bernardino County line; Mulholland Highway (two sections), from SR-1 to Kanan Dume Road, and from west of Cornell Road to east of Las Virgenes Road; Topanga Canyon Boulevard (SR-27), north from SR-1; and Malibu Canyon–Las Virgenes Highway, from SR-1 to Lost Hills Road. There are also eight eligible scenic highways in the County.

The General Plan Update EIR concluded that no development or changes would occur along or near any of the adopted state scenic highways within the unincorporated areas. The General Plan Update EIR found that while some development or changes could occur near the eligible scenic highways, the development or changes anticipated to occur would be minimal and would only occur near small stretches of the eligible scenic highways. Additionally, future discretionary projects accommodated by the General Plan Update would be subject to separate project-level environmental review in accordance with CEQA, wherein the individual project’s contribution to the degradation of scenic highways would be assessed at the time formal development plans/applications are submitted to the County for review and approval. Furthermore, several goals and policies of the General Plan Update would serve to minimize potential impacts to scenic highways by preventing degradation of existing vistas, as well as by promoting actions that would make existing scenic vistas more accessible to individuals. Therefore, the General Plan Update EIR concluded that no significant impact would result from implementation of the General Plan Update with respect to substantial alteration of scenic resources within a designated scenic highway.

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State scenic highways in unincorporated parts of the County are located within Very High Fire Hazard Severity Zones (VHFHSZ), where the replacement requirements of AHPO do not apply. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts.

Impacts under the AHPO to other eligible scenic highways would be less than those analyzed in the General Plan Update EIR because individual projects are generally anticipated to be developed within urbanized areas and not in locations where any of these routes could be substantially impacted. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does AHPO Require Subsequent or Supplemental CEQA Documentation with respect to degradation of existing visual character or quality of the site and its surroundings?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Visual character within the County is greatly varied. The County’s mountain ranges, foothills, valleys, basins, beaches, coastal islands, deserts, as well as the built environment and the variety within this category all contribute to the visual character of an area. The General Plan Update EIR concluded that there would be the potential for substantial changes to the visual character of the County, primarily related to the overall magnitude of growth anticipated. However, the guidelines and development standards existing in the regulatory framework would serve to lessen the potential impacts by providing consistency from past to future development. Additionally, several of the guiding principles, goals, policies, and implementation programs contained in the General Plan would serve to lessen or mitigate potential impacts by providing direction for future decision making, as well as by requiring additional future review of potential impacts of individual development projects that would be accommodated by the General Plan Update. Changes in land use included in the General Plan Update are generally limited to portions of the County that feature existing urban development. The introduction of higher density development and mixed uses in these areas would result in small adjustments to the community character and visual appearance of the applicable Planning Areas. Although land use changes are not proposed for the Antelope Valley Planning Area and Santa Clarita Valley Planning Area, these areas are anticipated to experience substantial growth prior to buildout. These areas would likely experience the most substantial changes in visual character and appearance during that period. However, applicable portions of the County Code, and

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relevant goals and policies of the General Plan would reduce these impacts. Therefore, the General Plan Update EIR found impacts related to changes in visual character to be less than significant.

Because the AHPO would require replacement of affordable units on a one-to-one basis, it generally would not change the location that development would occur. For inclusionary projects, the ordinance would allow for offsite replacement that meets certain locational requirements. The AHPO would not increase development compared to what was analyzed in the General Plan Update EIR. Generally, units would not be constructed as a result of the AHPO beyond what is already existing. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. As such, there would be no substantial change in visual character as a result of AHPO.

As concluded in the General Plan Update EIR, changes in land use would generally be limited to areas that feature existing urban development. Individual projects are generally anticipated to be developed within urbanized areas and would be consistent with urban/suburban visual character. General Plan goals and policies would remain in effect to lessen and mitigate any potential impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that buildout under the General Plan Update would result in the construction of additional development throughout the County, which would generate additional sources of light and glare that could adversely affect day or nighttime views. However, since development would generally occur in urbanized areas where existing lighting and light pollution are already high, these increases in light and glare would not be substantial. In rural areas of the County growth could also potentially diminish nighttime views and/or dark skies, but applicable regulations would minimize these impacts. The General Plan Update EIR found impacts related to light and glare would be less than significant.

Individual projects under the AHPO could introduce new lighting sources. However, the AHPO would generally apply to projects that are already proceeding regardless of the AHPO. Where the AHPO leads

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to development not on the primary site (i.e., off site replacement of units), such development could lead to new sources of light and glare. However, such off-site replacement units are generally expected to be constructed in areas where development already exists and where existing lighting is typical of urban uses. The County's Dark Skies Ordinance protects areas in the Antelope, Santa Clarita and San Fernando valleys and the Santa Monica Mountains North Area from light pollution by requiring measures, such as directing lighting towards the ground. The replacement requirements of the AHPO do not apply to VHFHSZs.

Development of individual projects that are subject to the AHPO would be subject to County requirements that regulate spillover lighting including the Rural Outdoor Lighting Ordinance, which applies to rural areas throughout Los Angeles County. Additionally, the California Building Code contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulation light power and brightness, shielding, and sensor controls. Individual projects would be required to comply with County requirements addressing spillover light and glare, and projects would generally be limited to urbanized areas. The AHPO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

While not specifically addressed by CEQA, the General Plan Update EIR evaluated shade and shadow impacts specifically related to the Antelope Valley Planning Area where the General Plan anticipates development to occur. The AHPO could lead to incrementally larger projects than would otherwise have occurred without the AHPO as units are added to projects to offset the cost of affordable units. However, these projects would likely be in urban areas that would not be substantially affected by these incremental increases in shade/shadow. It is not anticipated that the AHPO would substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.2 AGRICULTURE AND FORESTRY RESOURCES

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the Agricultural Resource Area (ARA) policies under the General Plan would reduce both direct and indirect impacts of conversion of mapped Important Farmland. However, these ARAs would not be agricultural preserves and some conversion to non-agricultural uses would be permitted. As such, impacts due to buildout of the General Plan were identified as significant in the Antelope Valley Planning Area and Santa Monica Mountains Planning Area. As most of Los Angeles County is 1) urbanized, 2) mountainous terrain unsuitable for intensive commercial agriculture, or 3) land with other constraints that make commercial agriculture infeasible (such as lack of water supply or soil suitability), use of offsite preservation as a mitigation measure would require acquisition of land outside of the County and therefore was considered infeasible. Impacts in the remaining nine Planning Areas were identified as less than significant.

The AHPO does not incentivize development and off-site replacement is restricted in location (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus), the AHPO would not result in substantial construction in areas of Important Farmland as these areas do not contain large numbers of affordable housing units, nor are they zoned for such use. Impacts to the Antelope Valley Planning Area would remain significant as discussed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a conflict with existing zoning for agricultural use, or a Williamson Act contract?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the zoning changes within the General Plan Update would not involve any rezoning of farmland and impacts regarding conversion of farmland to non-agricultural uses would be less than significant. Furthermore, the General Plan Update EIR identified that the only Williamson Act contracts in effect in Los Angeles County are located on Santa Catalina Island, of which there is no Important Farmland mapped. No impact to Williamson Act contracts would occur according to the General Plan Update EIR.

The AHPO would require replacement of lost affordable. Agricultural zoning would not be changed under the AHPO. Impacts to Williamson Act contracts as a result of the development in accordance with the AHPO would not substantially change as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a 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))?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that the General Plan includes the addition of two new zones created for future use in rural areas. However, both of these zones (C-RU and MXD-RU) have only been mapped along commercial corridors and in commercial areas. The remaining zones added as part of the General Plan Update would only be designated in intensely urban areas and would thus not impact forest land. As the County has no existing zoning specifically designating forest use, implementation of the General Plan would not conflict with existing zoning for forest land or timberland. No impact would occur.

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The AHPO would require replacement of lost affordable units, while this could occur on forest land such losses and replacement units would involve small areas that are generally anticipated to already be used for housing. The replacement requirements of the AHPO do not apply in VHFHSZs, a designation that applies to forest land in unincorporated Los Angeles County. The AHPO is generally anticipated to apply to areas of the County where development exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a result in the loss of forest land or conversion of forest land to non-forest use?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Forests in the County are largely limited to mountain ranges in three of the eleven Planning Areas: Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains. Small areas of forest are also found at the northern edge of the East San Gabriel Valley and West San Gabriel Valley Planning Areas. The largest concentration of forest is in the Angeles National Forest, which covers 25 percent of the land area of the County. Despite the large extent of the Angeles National Forest, very little of its area contains forests or woodlands as defined by the California Public Resources Code. Most of the land area in the Angeles National Forest is chaparral or similar scrub communities. Forests in the County are limited to narrow formations along creeks and other watercourses and the highest elevations of the San Gabriel Mountains. The General Plan Update EIR indicates that Forest land within Los Angeles County is protected through the County’s Significant Ecological Area (SEA) Ordinance. As part of the General Plan Update, the County completed minor updates to the SEA designations and policies, including minor changes to the policies, boundaries and technical descriptions of the County’s SEAs. The General Plan Update EIR concluded that compliance with the SEA Ordinance would reduce potential impacts to forest land to a less than significant level.

The Angeles National Forest and Los Padres National Forest lie within the unincorporated areas of Los Angeles County and are managed by the U.S. Forest Service. These forest areas are zoned for watershed, open space, agriculture and a limited amount of low-density residential and rural commercial development. While affordable housing units may be located in these forest areas, any redevelopment including replacement units would generally be expected to impact areas already developed. Therefore,

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impacts related to the loss of forest land would remain less than significant. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation that would 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR, due to agricultural uses being incompatible with some other land uses, concluded that buildout under the General Plan Update may lead to new nonagricultural uses that develop around existing agricultural uses, which would create pressure for them to be converted to nonagricultural uses. Implementation of Agricultural Resource Area (ARA) policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to incompatible non-agricultural uses. However, ARAs are not agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. The General Plan Update EIR found that in the Antelope Valley Planning Area and Santa Clarita Valley Planning Area there would be a significant indirect impact on conversion of mapped Important Farmland to nonagricultural use due to pressure to convert farmland to non-agricultural uses and related incompatibilities between agricultural and urban uses. The General Plan Update EIR indicated that there are no feasible mitigation measures to reduce impacts to farmland in these areas. The General Plan Update EIR found that impacts would be less than significant in the nine other Planning Areas.

While small numbers of existing affordable units may be located in areas of Farmland or forest land, the AHPO would not result in development that would result in substantial additional conversion of these areas beyond the existing footprints of development. The AHPO itself would not change any allowable land uses or result in any net additional units as it only requires a one-for-one replacement of affordable units. Therefore, forests and farmlands would not be significantly impacted. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.3 AIR QUALITY

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with or the potential to obstruct implementation of the applicable air quality plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that the Antelope Valley Air Quality Management District (AVAQMD) and the South Coast Air Quality Management District (SCAQMD) consider a project consistent with the air quality management plan (AQMP) if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, vehicle trips, or vehicle miles traveled (VMT) are deemed to not exceed this threshold. Based on projections from the Southern California Association of Governments (SCAG), buildout of the General Plan Update in 2035 would result in higher populations for the unincorporated areas of the County. The General Plan Update EIR concludes that individual development projects would be consistent with the control measures and regulations identified in the SCAQMD and AVAQMD's AQMPs. However, the General Plan Update EIR found that development would not be consistent with the AQMPs because the buildout in the unincorporated areas would exceed forecasts in the AQMP. As such, the impact was found to be significant and unavoidable.

The AHPO would require one-for-one replacement of any affordable units that are lost due to demolition or vacation as part of a project. The AHPO would not increase the growth and development beyond what is anticipated from buildout of the General Plan Update. Since the release of the General Plan Update, the SCAQMD adopted an updated AQMP in 2017 that incorporates SCAG's updated population projection numbers from the 2016/2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that would account for the population increase in unincorporated areas of the County. However, the AVAQMD's Ozone Attainment Plan has not been updated and as a result there is the potential for development from the General Plan Update to exceed the AVAQMD's plan. Generally, the AHPO would not result in a substantial increase in units. The AHPO would not substantially change impacts related to any air quality management plan as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the potential to violate any air quality standard or contribute substantially to existing or projected air violation?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that due to the scale of development activity associated with the buildout of the General Plan Update, construction activities would likely generate criteria air pollutant emissions that would exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the South Coast Air Basin (SoCAB) and Antelope Valley portion of the Mojave Desert Air Basin (MDAB).

The General Plan Update EIR indicates that construction activities associated with buildout could expose people to Valley Fever within the arid, desert portions of the unincorporated areas of the County. The General Plan Update EIR indicates that individual projects are required to reduce the potential risk of exposing sensitive receptors to Valley Fever through implementation of AVAQMD and SCAQMD fugitive dust control measures. SCAQMD and AVAQMD dust control rules would reduce fugitive dust emissions as well as exposure to on-site workers. General Plan Update policies, including Policy AQ 1.3 (Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible), would further reduce the impacts from fugitive dust during construction.

The General Plan Update EIR concludes that construction emissions must be addressed on a project-by-project basis and that for a broad-based General Plan Update, it is not possible to determine whether the scale and phasing of individual projects could result in the exceedance of the SCAQMD's or the AVAQMD's short-term regional or localized construction emissions thresholds. **Mitigation Measure AQ-1** (construction equipment and procedures), regulatory measures, as well as goals and policies in the General Plan Update would reduce air pollutant emissions. However, due to the likely scale and extent of construction activities pursuant to the future development that would be accommodated by the General Plan Update, at least some projects would likely continue to exceed the SCAQMD and AVAQMD thresholds. Therefore, the General Plan Update EIR determined construction- and operation-related air quality impacts of the buildout of the General Plan would be significant and unavoidable.

The AHPO would require development projects to replace lost affordable units on-site or off-site in limited cases as allowed by the AHPO. While overall total emissions in the future are expected to be less than today

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(as a result of emissions controls), there is the potential for violations of standards adjacent to individual construction sites. As with development under the General Plan Update, it is not possible to determine the scale or phasing of individual projects. An evaluation of the construction emissions would be undertaken on a project-by project basis. The AHPO could result in an incremental increase in construction emissions attributable to replacement units but such increases are expected to be minor even where replacement units are constructed off-site. Multiple such projects could lead to emissions exceeding regional thresholds and therefore emissions associated with construction could be significant. Such emissions would be within the assumptions identified in the General Plan Update EIR. As indicated in the General Plan Update EIR, the risk posed from Valley Fever would be reduced to less than significant levels with the implementation of the SCAQMD or AVAQMD's fugitive dust measures. However, even with the implementation of **Mitigation Measure AQ-1**, regulatory measures, as well as general plan goals and policies, it is likely that some projects would exceed the relevant SCAQMD and AVAQMD criteria air pollutant thresholds, as described above, these impacts were fully disclosed within the General Plan Update EIR and no new or greater impacts would occur.

Individual projects would result in emissions as a result of mobile sources (vehicles) and stationary sources (heating, ventilation and air conditioning, lighting, landscape equipment). On some sites (such as redevelopment) existing uses already generate emissions. However, because specific sites are not known, such existing uses (and therefore associated emissions) are unknowable at this time. Overall development and associated emissions would be within assumptions for the unincorporated County of Los Angeles as analyzed in the General Plan Update EIR.

The AHPO would not substantially change construction or operational air quality impacts relative to violation of air quality standards as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that buildout of the land use plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. **Mitigation Measure AQ-1** as well as General Plan Update goals and policies would reduce these impacts. However, due to the magnitude of emissions generated by the buildout, mitigation measures would not reduce impacts below SCAQMD's or AVAQMD's thresholds. The General Plan Update EIR found impacts would be less than significant.

The AHPO would not increase the growth and development beyond what is evaluated in the General Plan Update EIR. Generally, the AHPO would not result in a substantial increase in development.

The AHPO would not result in growth greater than evaluated in the General Plan Update EIR or growth anticipated in the 2016 AQMP. The AHPO would not substantially change cumulative air quality impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the potential to expose sensitive receptors to substantial pollutant concentrations?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR identifies a land use plan that would result in the operation of new land uses, and would generate new sources of criteria air pollutants and toxic air contaminants (TACs).

SCAQMD and AVAQMD consider projects that cause or contribute to an exceedance of the California Ambient Air Quality Standards (CAAQS) or the National Ambient Air Quality Standards (NAAQS) to

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result in significant impacts. Due to the scale of development activity associated with buildout of the General Plan Update, emissions could exceed the SCAQMD and AVAQMD regional significance thresholds and therefore, in accordance with the SCAQMD and AVAQMD methodology, may result in a significant localized impact. Those projects of sufficient size to result in significant air quality are generally expected to require discretionary review and would be evaluated and mitigated as appropriate on a project-by-project basis. The General Plan Update EIR indicated that, due to the broad-based nature of the EIR it was not possible to determine whether the scale and phasing of individual projects would result in the exceedance of localized emissions thresholds. Nevertheless, because of the likely scale of future development that would be accommodated by the General Plan Update, at least some projects were expected to individually exceed the CAAQS and/or NAAQS.

The General Plan Update EIR also indicated that operation of new land uses, consistent with the General Plan Update, could also generate new sources of TACs within the unincorporated areas from various industrial and commercial processes (e.g., manufacturing, dry cleaning). Stationary sources used as emergency power supply to communication equipment could also generate new sources of TACs and particulate matter. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD or AVAQMD include industrial land uses, such as chemical processing facilities, dry cleaners, and gasoline-dispensing facilities. In addition to stationary/area sources TACs, warehousing operations could generate a substantial amount of diesel particulate matter emissions from off-road equipment use and truck idling. New land uses in the unincorporated areas that generate truck trips (including trucks with transport refrigeration units) could generate an increase in DPM that would contribute to cancer and non-cancer risks in the SoCAB or Antelope Valley portion of the MDAB. These land uses could be near existing sensitive receptors within the unincorporated areas. Since the nature of these emissions could not be determined at the time of General Plan Update preparation, the impacts are considered significant. **Mitigation Measure AQ-3** requires projects that will cite new sensitive receptors within a certain distance of land uses associated with high levels of TAC emissions to prepare a health risk assessment and, if necessary, apply additional on-site mitigation. Therefore, sensitive receptors placed near major sources of air pollution would achieve the incremental risk thresholds established by SCAQMD and AVAQMD. The General Plan Update EIR found impacts would be less than significant.

As discussed above, the AHPO would not increase growth and development beyond what is anticipated in the General Plan Update EIR nor would the ordinance substantially change the location in which development would occur. The AHPO would not generate new sources of mobile or stationary-source TAC emissions typically associated with industrial or commercial processes.

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In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project, as well as other impacted individuals.

However, **Mitigation Measure AQ-3** requires projects that will cite new sensitive receptors within a certain distance of land uses associated with high levels of TAC emissions to prepare a health risk assessment and, if necessary, apply additional on-site mitigation. The AHPO would not substantially change air quality impacts relative to sensitive receptors as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to creating objectionable odors affecting a substantial number of people?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that industrial land uses associated with the General Plan Update could create objectionable odors. However, **Mitigation Measure AQ-4** (odor management plan) would ensure that odor impacts are minimized, and facilities would comply with SCAQMD and AVAQMD Rule 402. The General Plan Update EIR found impacts would be less than significant.

The AHPO would provide for replacement of lost affordable units. The AHPO itself would not change any allowable land uses and generally would not result in any net additional units as it only requires a one-for-one replacement of affordable units. The AHPO would not encourage the development of industrial land uses that could create objectionable odors. Residential use is not associated with odor nuisance and therefore this impact is less than significant. The AHPO would not substantially change odor impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.4 BIOLOGICAL RESOURCES

(a) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to having 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 (USFWS)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the policies from the General Plan Update, including updates to the Significant Ecological Area (SEA) designations and policies will have direct and indirect beneficial impacts for special-status species by emphasizing avoidance and minimization of impacts to habitats and encouraging greater protection for habitat and resources. However, the buildout of the General Plan Update will result in impacts to various habitat types, which will result in the loss of special-status species through direct mortality or via indirect effects (e.g., through wildlife habitat loss and edge effects at the urban-wildland interface). **Mitigation Measure BIO-1** (biological resources assessment report) would ensure that, on a project-specific level, necessary surveys are conducted, and a biological resources assessment is prepared to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. **Mitigation Measure BIO-2** (pre-construction surveys) would ensure that no direct mortality to special-status species would occur with implementation of construction activities by requiring pre-construction surveys (and construction monitoring where warranted) for special-status species as necessary.

Although direct impacts to special-status species would be mitigated, there is no mitigation provided for the indirect impacts to special-status species through the loss of common (i.e., non-sensitive) habitats. Special-status species are dependent on a variety of habitat types (comprised of both common and sensitive habitats), and the conversion of common habitat types with the buildout of the General Plan Update would result in the overall reduction of habitat and resources to support special-status species. The General Plan Update EIR found impacts would be significant and unavoidable.

The AHPO would not make changes to the SEA designations or policies. SEAs often overlap with VHFHSZs. As discussed above, the replacement requirements of the AHPO do not apply to VHFHSZs.

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The AHPO would apply to areas where residential use is the primary use and where a site is already developed with affordable housing. Generally, areas already developed with affordable housing and areas where replacement units may be constructed provide little, if any, biological resources in the form of habitat, species or plant communities therefore, threatened, endangered, protected and sensitive species, and habitats, are not anticipated to be affected. Any AHPO projects which occur within SEA designated areas would be subject to all existing regulations in the SEA. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. **Mitigation Measures BIO-1** and **BIO-2** would remain in effect to mitigate potential direct impacts to a less than significant level. However, indirect impacts would remain significant and unavoidable, as was determined in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to having a substantial adverse effect on any riparian habitat or sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update incorporates proposed SEAs to identify the County’s most sensitive biological resources, which includes riparian habitat and sensitive plant communities. However, the SEAs do not guarantee preservation, nor do they protect all riparian habitat and sensitive plant communities found within Los Angeles County. Implementation of all of these policies will have both direct and indirect beneficial effects for riparian habitat and sensitive plant communities by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, and by emphasizing avoidance, minimization, and mitigation of impacts to habitats. However, the buildout of the General Plan Update will impact various habitat types, including riparian habitat and other sensitive plant communities. Thus, The General Plan Update EIR concluded that buildout would have a significant adverse effect on these resources.

Mitigation Measure BIO-1 would ensure that, on a project-specific level, necessary surveys are conducted and a biological resources assessment is prepared to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. **Mitigation Measure BIO-3** (wildlife corridors and nursery sites) would ensure that unavoidable impacts to sensitive habitats are mitigated with the

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environmentally superior mitigation; thus, with implementation of this mitigation measure, impacts to sensitive habitat would be considered less than significant. The General Plan Update EIR found impacts would be less than significant.

Many of the areas with the most sensitive natural communities such as SEAs, Hillside Management Areas (HMAs), and coastal habitat are either devoid of residential uses or are developed with residences for upper income households. It is unlikely that affordable housing units exist in such areas. In addition, zoning restrictions make the development of residential uses in sensitive areas difficult. Sensitive areas have building requirements and discretionary permit review processes to protect the most sensitive natural communities in the unincorporated areas. In 2019, the County adopted the SEA Ordinance which established permitting requirements, development standards, and review processes for developments within SEAs. Therefore, new projects proposed within a SEA would be subject to the ordinance and subject to all existing regulations. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. While the AHPO could apply in these SEAs, any requirement for replacement units is expected to involve a small number of units in areas already developed with housing. Such projects would not be likely to occur in areas with substantial sensitive natural communities. Any projects that may occur in such areas would be subject to **Mitigation Measure BIO-1** and **BIO-3** would remain in effect to reduce potential impacts to a less than significant level. Furthermore, SEAs are frequently located within VHFHSZs, where the replacement requirement of the AHPO does not apply.

The AHPO would not result in substantial housing construction in sensitive natural communities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to having a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that buildout of the General Plan Update may impact wetland areas and these impacts may have a significant adverse effect on wetlands through hydromodification, filling, diversion or change in water quality. **Mitigation Measure BIO-1** would ensure that, on a project-

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specific level, necessary surveys are conducted and a biological resources assessment is prepared to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. In addition, for wetlands under the jurisdiction of the USACE, CDFW, and/or RWQCB, as well as waters and riparian habitat under their respective jurisdictions, permits and mitigation may be required, subject to the approval of the regulatory agencies. Furthermore, project locations with plant communities considered sensitive by the CDFW must be analyzed under CEQA. The General Plan EIR found impacts with implementation of these mitigation measures in combination with the requirements for regulatory permitting (e.g., Section 404 permitting and any associated mitigation requirements), impacts to wetlands would be considered less than significant.

The AHPO requires one-for-one replacement of any affordable housing units that are lost due to demolition or vacation as part of a project. The AHPO would not increase the overall growth and development beyond what is anticipated in the General Plan Update EIR, nor would the ordinance change the location of planned development. Unincorporated Los Angeles County contains areas with coastal wetlands, drainages, marshes and vernal pools. Development in these areas is highly regulated and subject to restrictions. Any impact related to implementation of the AHPO would be within those evaluated in the General Plan Update EIR.

Any impacts to federal or state protected wetlands and waters of the United States would be limited due to existing regulations and building requirements including discretionary permit review processes designed to protect the most sensitive marshes, vernal pools, coastal wetlands, and drainages. Since the most sensitive of these resources are protected by existing regulations, the impacts of the AHPO would be less than what was disclosed in the General Plan Update EIR.

For waterways in the unincorporated areas that are not located in special management areas, the General Plan Update includes polices to preserve wetlands and streambeds. In addition, state and federal agencies are involved in the review and permitting of projects in these areas when necessary. Therefore, the AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to interfering 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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According to the General Plan Update EIR, Los Angeles County supports seven regional wildlife linkages: San Gabriel – Castaic Connection, San Gabriel – San Bernardino Connection, Santa Monica – Sierra Madre Connection, Sierra Madre – Castaic Connection, Tehachapi Connection, Antelope Valley Connection, and the Puente Hills – Chino Hills Connection. There are 11 linkages along principal water courses, nine linkages along ranges of mountains and hills, and an important linkage along the San Andreas Fault.

Policies within the General Plan Update, including updates to the SEA Ordinance, have both direct and indirect beneficial effects protecting regional wildlife linkages and facilitating wildlife movement by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas. However, the General Plan Update EIR indicated that buildout could impact regional wildlife linkages and nursery sites, constituting a potentially significant adverse effect on wildlife movement and nursery sites. **Mitigation Measure BIO-1** and the update to the SEA Ordinance may provide some protection to avoid or minimize impacts to wildlife corridors and nursery sites; however, for those projects where avoidance or minimization of impacts is infeasible, the policies proposed in the General Plan Update do not provide for mitigation for loss of wildlife movement opportunities or nursery sites. If development impacts regional wildlife linkages and impedes wildlife movement, connectivity will be lost on a regional scale in these vital landscape corridors and linkages. Thus, the General Plan Update EIR found impacts would be significant and unavoidable.

Many of the areas that are identified as wildlife linkages or that serve as important habitat and/or connections between habitat and wildlife migratory routes, are zoned for watershed, open space, agriculture and a limited amount of low-density residential development. While limited amounts of affordable housing could occur in proximity to these sensitive areas, any replacement units are generally anticipated to occur in the footprint of existing development because of the small number of units involved and restrictions on location of off-site units (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). The AHPO would not increase development beyond what is already anticipated under the General Plan Update. Any projects developed within an SEA would be subject to existing regulations. Therefore, the AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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(e) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflicts with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that development will impact oak trees and oak woodlands. The County Oak Tree Ordinance and Oak Woodlands Conservation Management Plan (OWCMP) are applied on a project-specific level and consistency with these plans is determined on a project-by-project basis. The General Plan Update EIR found that the policies of the General Plan Update support the conservation of oak trees and oak woodlands and do not conflict with the County Oak Tree Ordinance or OWCMP. The General Plan EIR found impacts would be less than significant.

There are oaks and other unique native trees within the unincorporated areas of Los Angeles County. AHPO projects would be subject to the Oak Tree Ordinance. Further, the removal of oak trees requires appropriate permits and approvals through the Los Angeles County Department of Regional Planning, such as Oak Tree Permits. The AHPO would not make any changes to the County Oak Tree Ordinance or OWCMP. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(f) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to compliance with adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Los Angeles County's coastal zone contains valuable biological resources, including San Clemente Island, Santa Catalina Island, Marina del Rey, Ballona Wetlands and the Santa Monica Mountains. The study and management of these resource areas is more rigorous than other areas in Los Angeles County, and any land disturbance is regulated through coastal land use plans and local coastal programs (LCPs), in compliance with the California Coastal Act. The General Plan Update EIR found that the policies of the General Plan

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Update would not conflict with these goals and policies of these plans and LCPs. The General Plan Update EIR found impacts would be less than significant.

The AHPO would not make any changes to the coastal land use plans and local coastal programs. The AHPO applies to all unincorporated areas in Los Angeles County, which includes substantial biological resources mentioned of San Clemente Island, Santa Catalina Island, Marina del Rey, Ballona Wetlands, and the Santa Monica Mountains. While limited amounts of affordable housing may be located in proximity to these sensitive resources any replacement units are generally anticipated to occur in the footprint of existing development because of the small number of units involved and restrictions on location of off-site units. Further, Marina del Rey would not be subject to the AHPO.

There would continue to be no conflict with respect to compliance with any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.5 CULTURAL RESOURCES

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of a historical resource as defined in §15064.5?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that compliance with the goals, policies, and implementation measures of the General Plan Update would reduce impacts to historical resources. However, the policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the General Plan Update. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur in the future. The General Plan Update EIR found that even with implementation of **Mitigation Measures CUL-**

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1 (Mills Act incentives), **CUL-2** (draft a historic preservation ordinance), and **CUL-3** (draft an adaptive reuse ordinance) impacts would be significant and unavoidable.

The AHPO applies to affordable housing in all unincorporated areas of Los Angeles County. However, the Historic Preservation Ordinance and State Historic Building Code, if applicable, would be applied on a project by project basis and would protect historic buildings in unincorporated areas. As for development under the General Plan Update, it is not possible to determine exactly where development subject to the AHPO would occur. The policies within the General Plan Update would continue to minimize the probability of historic structures being demolished and **Mitigation Measures CUL-1, CUL-2, and CUL-3** would reduce impacts to historic resources. Any project that includes an historical resource, as defined by PRC § 21084.1 that meet PRC § 5024.1(g) as potentially eligible, would require discretionary review to ensure the development meets Secretary of Interior Standards for Rehabilitation or Reconstruction. This process would require that in order to grant the incentives or waiver, the project would not have a specific adverse impact on a property that is listed in the California Register of Historic Places, or the incentive or waiver would have a specific adverse impact for which there is a feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the housing development unaffordable. If the findings are not met, projects requesting to modify development standards will be subject to a discretionary review process and a project-specific environmental analysis under CEQA.

Based on the above, it is speculative at this time to identify the loss of any particular resource. However, impacts to historical resources are identified and disclosed in the General Plan Update EIR. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to causing a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that forecast development could impact known and unknown archaeological sites. Locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The County is considered potentially sensitive for archaeological

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resources. Thus, ground disturbance has a high potential for uncovering archaeological resources. However, existing federal, state, and local regulations address the provision of studies to identify archaeological and paleontological resources; application review for projects that would potentially involve land disturbance; project-level standard conditions of approval that address unanticipated archaeological discoveries; and requirements to develop specific mitigation measures if resources are encountered during any development activity. The General Plan Update EIR found impacts would be less than significant with implementation of **Mitigation Measures CUL-4** (archaeologist monitoring) and **CUL-5** (paleontologist monitoring), which apply in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site.

The AHPO applies to replacement of existing affordable housing on sites that are proposed for redevelopment regardless of the AHPO, as such, these sites are already disturbed, and the likelihood of impacts related to archeological resources would be low. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. If unexpected archaeological or paleontological resources are discovered during excavation activities such resources must be evaluated in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code §21083.2. Health and Safety Code §7050.5, Public Resource Code §5097.98, and Guidelines § 5064.5(e) address how unexpected finds of human remains are to be handled. In addition, mitigation measures identified in the General Plan Update EIR would apply to development under the AHPO.

Based on the above, it is speculative at this time to identify the loss of any particular resource. However, impacts to archaeological resources are identified and disclosed in the General Plan Update EIR. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The General Plan Update EIR indicates that ground disturbance could damage fossils buried in soils. Abundant fossils occur in several rock formations in the County. These formations have produced numerous important fossil specimens. Therefore, the County contains significant, nonrenewable, paleontological resources and are considered to have high sensitivity. The General Plan Update EIR requires implementation of **Mitigation Measures CUL-4** and **CUL-5** to reduce impacts to a less than significant level.

The AHPO applies to replacement of existing affordable housing on sites that are proposed for redevelopment regardless of the AHPO, as such, these sites are already disturbed, and the likelihood of impacts related to archeological resources would be low. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas. In cases where undeveloped parcels are found to contain paleontological resources, or parcels that are adjacent to paleontological resources, may have to undergo mitigation per consultation with a designated paleontologist or archeologist, consistent with **Mitigation Measure CUL-4** (off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus). Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. In the event that paleontological resources are encountered during excavation, the project would be required to halt all development activities and retain the services of a qualified paleontologist, who can advise when construction activities can recommence, per the PRC §5097.5. Compliance with these guidelines would ensure no new or greater impacts would occur.

Based on the above, it is speculative at this time to identify the loss of any particular resource. However, impacts to paleontological resources are identified and disclosed in the General Plan Update EIR. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to disturb any human remains, including those interred outside of formal cemeteries?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The General Plan Update EIR determined that since there are thousands of archaeological sites within Los Angeles County, and human habitation in Los Angeles County is known to date to at least approximately 7,000 years B.C., human remains could be buried in soils. Excavation during construction activities has the potential to disturb human burial grounds, including Native American burials, in underdeveloped areas of the County. However, there PRC § 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The Health and Safety Code (§§ 7050.5, 7051, and 7054) also has provisions protecting human burial remains from disturbance, vandalism, or destruction. The General Plan Update EIR found impacts would be less than significant upon compliance with these regulations.

Projects subject to the AHPO would be required to comply with PRC § 5097.98 as well as the Health and Safety Code (§§ 7050.5, 7051, and 7054).

While there is some potential to disturb human remains at individual sites, these impacts would be within those identified in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Tribal Cultural Resources

Assembly Bill 52 (Chapter 532, Statutes 2014) required an update to Appendix G of the *CEQA Guidelines* to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. However, at the time of the General Plan Update and per Senate Bill 18, county must consult with the NAHC and any appropriate Native American tribe before the adoption, revision, amendment, or update of a county's general plan. While the *CEQA Guidelines* have since been updated, the General Plan Update EIR did analyze impacts on tribal cultural resources in Section 5.5 Cultural Resources. Discussion of the General Plan Update EIR findings and analysis of AHPO impacts to tribal cultural resources are discussed below.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to use a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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:

- (e) 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)?
- (f) 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that development of projects pursuant to the General Plan Update could impact known and unknown archaeological sites. The General Plan Update EIR noted that at the time there were 85 Native American sacred sites under CEQA in association with archaeological resources or, in the case of burial locations, human remains. The Project Area is considered potentially sensitive for archaeological resources. However, **Mitigation Measure CUL-4**, which applies in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, would reduce impacts to a less than significant level.

The AHPO applies to replacement of existing affordable housing on sites that are proposed for redevelopment regardless of the AHPO, as such, these sites are already disturbed and the likelihood of impacts related to resources would be low. Requirements regarding the location of off-site replacement units would generally be expected to result in redevelopment of previously disturbed urban areas. Off-site replacement of affordable units would only be allowed for inclusionary housing projects that do not use a density bonus. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. **Mitigation Measure CUL-4** would continue to apply and impacts would be reduced to a less than significant level. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.6 GEOLOGY AND SOILS

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the County. The following analysis recaps the General Plan Update EIR for informational purposes, but potential impacts of the environment on a project are no longer considered potentially significant per the CBIA v. BAAQMD decision.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) 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? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?
 - iv) Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rupture of a Known Earthquake Fault

The General Plan Update EIR concluded that residents, occupants, or structures would potentially be exposed to seismic related hazards. Implementation of the General Plan Update at buildout would increase numbers of residents, workers, and structures in Los Angeles County. The siting of buildings would have to comply with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act, the purpose of which is to prevent the construction of residential buildings on top of the traces of active faults. The General Plan Update EIR found impacts would be less than significant upon compliance to applicable laws and setbacks from active fault traces.

The AHPO would not increase development beyond what is anticipated under the General Plan Update, as it requires one to one replacement of affordable housing. Mobilehome parks are subject to the State’s seismic safety regulations outlined in Title 25 of the California Code of Regulations. Residential projects subject to the AHPO would have to comply with the Alquist-Priolo Earthquake Fault Zoning Act, regardless of whether replacement units are provided on- or off-site. Development under the AHPO would not exacerbate existing earthquake faults and associated risks conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Strong Seismic Ground Shaking

The General Plan Update EIR explains that development projects are required to adhere to the provisions of the California Building Code (CBC). Projects are required to undertake detailed, site-specific geotechnical investigations. The geotechnical investigations identify seismic design parameters pursuant to CBC requirements, including foundation and structural design recommendations, as needed, to reduce hazards to people and structures arising from ground shaking. The General Plan Update EIR found impacts would be less than significant upon compliance with the requirements of the CBC for structural safety during a seismic event.

All projects including those subject to the AHPO are required to comply with CBC requirements. Each future development would be preceded by a detailed, site-specific geotechnical investigation. Development under the AHPO would not exacerbate existing ground shaking. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Liquefaction

The General Plan Update EIR indicates that forecast development would not result in increased risk of or exposure to liquefaction or other seismic-related ground failures. Each future development project would be required to comply with the recommendations in the geotechnical investigation report and comply with the CBC. The General Plan Update EIR found impacts would be less than significant.

Projects, including those subject to the AHPO, will need to comply with CBC regulations. Development under the AHPO would not exacerbate existing liquefaction potential. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Seismically Induced Landslides

The propensity for earthquake-induced landslides is greatest in hilly areas, with steep slopes and bedrock or soils that are prone to mass movement. Very few areas of the County have been mapped by the State as zones of seismically induced landslide hazards under the Seismic Hazard Zonation Program. Furthermore, several policies included in the Conservation and Natural Resources and Safety Elements of the General Plan Update have been developed to address potential seismic-related hazards such as ground shaking, liquefaction, and seismically induced landslides. Compliance with existing state and county regulations, as well as goals and policies included as part of the General Plan Update would ensure that the impacts

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associated with exposure to strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides are reduced to a less than significant level. The General Plan Update EIR found impacts would be less than significant.

Development under the AHPO would not exacerbate existing landslide conditions; existing CBC requirements to investigate and address soil conditions would ensure that projects do not exacerbate risk. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

- Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:
- (b) Result in substantial soil erosion or the loss of topsoil?
 - (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?
 - (d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial risks to life or property?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that forecast development would result in substantial soil erosion, the loss of topsoil, or development atop unstable geologic units or soils, or expansive soils.

Erosion

Buildout of the General Plan Update would involve construction-related ground disturbance in various parts of Los Angeles County. During future development, soil would be graded and excavated, exposed, moved, and stockpiled. Construction and site grading of future development projects pursuant to the General Plan Update could cause substantial soil erosion without effective soil-erosion measures. Adherence to the requirements of the County Code and the CBC, together with the safeguards afforded by the County’s building plan check and development review process, would help ensure that appropriate erosion controls are devised and implemented during construction. Furthermore, construction activities on project sites larger than one acre would be subject to National Pollution Discharge Elimination System (NPDES) requirements. Required erosion control measures may include temporary and/or permanent erosion control measures such as desilting basins, check dams, riprap or other devices or methods, as approved by the County. The General Plan Update EIR found impacts would be less than significant.

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AHPO projects would be required to comply with CBC regulations and the County's development review process, which would ensure appropriate erosion controls are devised and implemented during project construction. Applicable AHPO projects would also have to comply with NPDES requirements as appropriate. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Unstable Geologic Units or Soils and Expansive Soils

Buildout of the General Plan Update would increase numbers of residents, workers, and structures in Los Angeles County. The County is geographically expansive, embracing a variety of geologic settings and soil types. Areas of unstable geologic units or unstable or expansive soils are known to occur locally. Development considered for approval under the General Plan Update could expose structures or persons to potentially significant hazards due to unstable geologic units or soils. Compliance with existing state and county regulations, as well as the goals and policies included as part of the General Plan Update would ensure that the impacts associated with erosion and topsoil loss, as well as development atop unstable geologic units and soil, or expansive soil are minimized to the maximum extent practicable. The General Plan Update EIR found impacts would be less than significant.

Development under the AHPO has the potential to expose structures or persons to hazards due to unstable geologic units or soils, particularly when replacement units are constructed off-site. However, compliance with existing state and county regulations, as well as relevant General Plan Update goals and policies, would ensure that no new or greater impacts would occur. Development under the AHPO would not exacerbate existing soil conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that soil conditions would adequately support proposed septic tanks. Most new development that is anticipated in the County would not require the use of septic tanks or alternative wastewater disposal systems. In those few cases where septic systems might be necessary,

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such as rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, the prevailing soil conditions in Los Angeles County are generally amenable to the use to such systems. In addition, all on-site wastewater treatment systems (OWTS) will be required to comply with County Code, Titles 11 and 28 and other regulations applicable to OWTS, including requirements for preparation and submittal of feasibility reports in order to obtain the Department of Public Health - Environmental Health approval for construction and installation of OWTS. As such, there would be no impact from implementation of the General Plan Update at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. The General Plan Update EIR found impacts would be less than significant.

The AHPO does not increase development beyond what is already anticipated under buildout of the General Plan Update. It is more likely that septic systems would be necessary in rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, where soil conditions are able to accommodate such systems. Projects subject to the AHPO will still be required to comply with regulations applicable to OWTS. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.7 GREENHOUSE GAS EMISSIONS

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to generating GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that buildout of the General Plan would generate greenhouse gas (GHG) emissions that would have a significant impact on the environment. The General Plan Update would contribute to global climate change through direct and indirect emissions of GHG from land uses within the unincorporated areas. Impacts from GHG emissions within the unincorporated areas would be significant for long-term growth anticipated under the General Plan Update. **Mitigation Measure GHG-1** (GHG emissions inventory and reduction goals) as well as the Community Climate Action Plan (CCAP) would reduce impacts from buildout of the General Plan Update. However, additional statewide measures would be necessary to reduce GHG emissions under the General Plan Update to meet the long-term GHG

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reduction goals. Since no additional statewide measures are available, the General Plan Update EIR found impacts would be significant and unavoidable.

Implementation of the AHPO would not increase cumulative GHG emissions beyond what has been evaluated within the General Plan Update EIR. Furthermore, the County’s Community Climate Action Plan (CCAP), which was adopted as part of the General Plan Air Quality Element, described Los Angeles County’s plan to reduce GHG emissions in the unincorporated areas of the County by at least 11% below 2010 levels by the year 2020. The CCAP contains policies and implementing ordinances intended to promote energy efficiency and reduce the urban heat island effect.

Replacement units constructed under the AHPO either on- or off-site would support the CCAP by being energy efficient and compliant with Los Angeles County’s Green Building regulations in Title 31 and the California Green Building Code (CALGreen), which reference provisions for energy efficiency measures.

Since the release of the General Plan Update, the state has passed Senate Bill 32 (SB 32), which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. However, similar to the General Plan Update, even with the implementation of **Mitigation Measure GHG-1** and CCAP measures, additional statewide measure are necessary to reduce GHG emissions to meet the long-term GHG reduction goals. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that the General Plan Update is consistent with the statewide GHG reduction policies. Local actions identified in the General Plan Update include incorporating a multi-model transportation system into the Mobility Element and ensuring that the Land Use Policy Map for the unincorporated areas connects the transportation to land uses. Mobility management is an important component of a multi-modal transportation and a strategy for improving congestion and reducing VMT. Strategies include infrastructure to support liquid natural gas (LNG), compressed natural gas (CNG), and hydrogen vehicles; Intelligent Transportation Systems (ITS); and electric car plug-in ports. In addition, the

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County’s transportation demand management (TDM) policies include strategies that encourage changes travel behavior and discourage single occupant drivers. TDM policies include congestion management pricing, offering employer-based transit passes or increasing transit availability; regional carpooling programs; and parking management.

To achieve the local goals identified in CARB’s 2008 Scoping Plan, the General Plan Update included the CCAP which identifies and evaluates feasible and effective policies to reduce GHG emissions. Implementation of the CCAP would be necessary to ensure that the local GHG reduction goals for the County under AB 32 would be met. Adoption and implementation of the CCAP in its entirety would reduce GHG emissions to less than significant levels. However, in the absence of an adopted CCAP, consistency with plans adopted for the purpose of reducing GHG emissions toward the short-term target of AB 32 could be significant. The General Plan Update EIR found impacts would be significant and unavoidable.

The AHPO would maintain the County’s existing affordable housing stock by requiring one-for-one replacement of any units demolished or vacated as part of a project. Projects developed under the AHPO would be consistent with the statewide GHG reduction policies evaluated within the General Plan Update. Since the adoption of the General Plan Update in 2015, the state has passed SB 32, which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. The General Plan Update determined that the CCAP was necessary to meet local goals within the 2008 CARB Scoping Plan to meet AB 32. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.8 HAZARDS AND HAZARDOUS MATERIALS

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- (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?
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The General Plan Update EIR indicates that land uses in the County typically involve the use, storage, disposal and transportation of hazardous materials, such as fuels, lubricants, solvents and degreasers, and paints. The General Plan Update EIR indicates that the transportation of hazardous materials/waste may increase as a direct result of increased hazardous materials/waste usage within Los Angeles County. An increase in hazardous materials usage and transport could result in adverse environmental effects.

Numerous federal, state, and local regulations exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. Implementation of the General Plan Update would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses would be required to comply with applicable federal, state, and local regulations related to hazardous materials. The General Plan Update EIR found impacts would be less than significant.

The AHPO requires replacement of lost affordable units on a one-for-one basis. Much of the County’s affordable housing stock is older and therefore could contain hazardous materials such as asbestos or lead paint. Handling of hazardous materials in the course of construction would be regulated by existing Health & Safety Code and Fire Code requirements. In some cases, a project level environmental assessment would determine the potential for impacts as well as any required mitigation.

Further, affordable housing units demolished and constructed under the AHPO do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the AHPO would not involve the substantial transport, use, and disposal of hazardous materials. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to being located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment. ?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that numerous sites within the County are listed on hazardous materials databases compiled pursuant to Government Code § 65962.5. Some of the sites are listed as closed, indicating that they have been investigated and/or remediated to the satisfaction of the lead

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responsible agency (e.g. RWQCB, DTSC, ACDEH, ACWD) based on land use at the time of closure. The General Plan Update would facilitate new development, including residential, mix-use, commercial, parks, and recreational open spaces, within Los Angeles County. Some of the new development could occur on properties that are likely contaminated. However, Federal and state regulations exist that prevent or reduce hazards to the public and environment from existing hazardous materials sites. In addition, the General Plan Update includes several policies within the Land Use Element that would reduce the potential for the public and the environment to be exposed to hazardous materials from existing site contamination. Compliance with applicable existing regulations and processes would ensure that the General Plan Update would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites. The General Plan Update EIR found impacts would be less than significant.

Some AHPO projects could occur on properties that may be contaminated. However, federal and state regulations as well as policies within the Land Use Element of the General Plan would reduce the potential for the public and the environmental to be exposed to hazardous materials from existing site conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (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 result in a safety hazard for people residing or working in the County?
- (f) For a project in the vicinity of a private airstrip, result in a safety hazard for people residing or working in the County?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that federal and state regulations exist that prevent hazards to the public and environment near public airports. These include FAA regulations, which establish safety standards for civil aviation, and the State Aeronautics Act, which establishes air safety standards. In addition, the County requires that development projects near public airports comply with any applicable Airport Land Use Compatibility Plan. Implementation of the General Plan Update may result in land use designations that allow development within two miles of a public airport, private airstrip, or heliport. However, existing FAA regulations, County policies and regulations, and General Plan Update goals and

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policies are intended to identify and properly address potential airport hazards prior to implementation of specific projects within the County. The General Plan Update EIR found impacts would be less than significant.

AHPO projects could be constructed within two miles of a public airport, private airstrip, or heliport. However, all projects would be subject to existing FAA regulations, County policies and regulations, and General Plan Update goals and policies intended to address potential airport hazards to specific projects. Furthermore, the AHPO by itself would not increase the number of units that are allowed to be built since it only requires the replacement of affordable units on a one-for-one basis. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(g) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that continued growth and development in Los Angeles County will significantly affect the Los Angeles County Fire Department (LACoFD) and Los Angeles County Sheriff's Department (LASD) operations. Coordination among various County departments is necessary to ensure adequate emergency response. Collaboration can also ensure that development occurs at a rate that keeps pace with service needs. In addition, several proposed policies of the Safety Element of the General Plan have been developed to address this potential hazard. The General Plan Update EIR found that compliance with applicable regulations and implementation of the General Plan Update goals and policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan is less than significant.

Disaster routes mapped in the General Plan Safety Element are freeways and highways. Therefore, it is unlikely that a project would be approved that blocks access to the public right of way. New development generally would not occur as a result of the AHPO. Projects subject to the AHPO would be required to implement applicable regulations as well as General Plan Update goals and policies to reduce the risk of impaired implementation or physical interference of an adopted emergency response plan or emergency

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evacuation plan. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(h) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to the urbanized areas or where residences are intermixed with wildlands?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that portions of the County are within moderate, high, and very high fire hazard zones and could expose structures and/or residences to fire danger. Although fires are a natural part of the wildland ecosystem, development in wildland areas increases the danger of wildfires to residents, property, and the environment. Although multiple regulations are in place to ensure that adequate infrastructure, such as peak load water supplies and necessary disaster routes are incorporated into new developments, older communities with aging and substandard infrastructure may face greater risks from wildland fires. The General Plan Update EIR concludes that policies and conditions of approval for future development projects within the County, in addition to compliance with applicable regulations, will minimize impacts related to wildland fires. The General Plan Update EIR found impacts would be less than significant.

Los Angeles County’s VHFHSZs are mostly forest areas, such as the Angeles National Forest and Los Padres National Forest. These forest areas are zoned for watershed, open space, agriculture, and a limited amount of low-density residential and rural commercial development. The replacement requirements of the AHPO do not apply within VHFHSZs, a designation that applies to areas where residences are intermixed with wildlands. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.9 HYDROLOGY AND WATER QUALITY

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the

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impact of that exacerbated condition on the environment, which may include future residents and users within the County. The following analysis recaps the General Plan Update EIR for informational purposes, but potential impacts of the environment on a project are no longer considered potentially significant per the CBIA v BAAQMD decision.

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the violation of any water quality standards or waste discharge requirements?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that implementation of the General Plan Update would comply with water quality standards and waste discharge requirements and would not substantially degrade water quality. Construction projects of one acre or more in area in each of the three Water Board regions (Los Angeles, Lahontan, and Central Valley) would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2012. Projects obtain coverage by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. The General Plan Update EIR found impacts would be less than significant upon compliance with regulatory requirements and General Plan Update policies.

AHPO projects would be required to develop and implement a SWPPP and BMPs to minimize pollution of runoff. As such, impacts would remain less than significant upon compliance with regulatory requirements and General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that development pursuant to the General Plan Update would interfere with groundwater recharge. Developments in the unincorporated areas of Planning Areas would be mostly limited to redevelopments and reuses of currently developed areas. Thus, redevelopments in those Planning Areas would result in relatively minor increases in impervious areas. Consequent impacts on groundwater recharge would be minimal. The General Plan Update EIR found impacts would be less than significant.

The AHPO requires replacement of lost affordable housing units. It is anticipated that most replacement units would be built within the envelope of the project that would occur regardless of the AHPO. To the extent that replacement units are located off-site they are subject to certain locational requirements that make it most likely that these units would occur in existing urban areas. Therefore, it is unlikely there would be a substantial increase in impervious surface as a result of the AHPO. Any increase in impervious surface as a result of the off-site units constructed as a result of the AHPO would be within the increases analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded the General Plan Update would not substantially alter drainage patterns in Los Angeles County and would not result in substantial erosion or siltation. Under the MS4 Permit certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. These requirements would ensure that there would not be a substantial change in drainage patterns in the Los Angeles Water Board Region, Lahontan Water Board Region, and Central Valley Water Board Region. The General Plan Update EIR found impacts would be less than significant.

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Similar to the General Plan Update, AHPO projects would be required to mimic predevelopment hydrology, evapotranspiration, and rainfall harvest as required by the MS4 permit. As a result, the AHPO would not create a substantial change in drainage patterns to the Los Angeles Water Board Region, Lahontan Water Board Region, or the Central Valley Water Board Region. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that forecast development would not change drainage patterns in Los Angeles County or in parts of adjoining counties in watersheds extending from Los Angeles County into those counties. Under the MS4 Permits in the Los Angeles and Central Valley Water Board regions, certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Projects within the Los Angeles Regional Water Quality Control Board (LARWQCB) Region and subject to low impact development (LID) requirements are required must limit post-development peak stormwater runoff discharge rates to no greater than the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion. Developments pursuant to the General Plan Update would not substantially increase runoff rates or volumes and substantial consequent flood hazards would not occur. The General Plan Update EIR found impacts would be less than significant.

AHPO projects would be constructed within the Los Angeles and Central Valley Water Board Regions. The MS4 permits in these areas will require the projects to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Any grading or paving would need to comply with LID and NPDES requirements to receive construction permits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the following:

(e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

(f) Otherwise substantially degrade water quality?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found impacts related to stormwater drainage and polluted runoff to be less than significant as a result of required compliance with existing regulations (including requirements for Stormwater Pollution Prevention Plans – SWPPP, MS4 and other requirements applicable to the Los Angeles and Lahontan regions).

The AHPO would not substantially increase units or developed area and would not be expected to substantially contribute to polluted runoff. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the following:

(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that forecast housing development could occur within 100-year flood hazard areas. However, development within 100-year flood zones would require improvements to flood control facilities, and issuance of Letters of Map Revision by the Federal Emergency Management Agency (FEMA) showing changes to 100-year flood zones reflecting such improvements; or that the floor beams of the lowest floor of the structure are raised above the 100-year flood elevation. Flood insurance available through the National Flood Insurance Program (NFIP) would also be required. Therefore, buildout of the General Plan Update would not place substantial numbers of people or structures at risk of flooding in 100-year flood zones, and impacts would be less than significant.

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If a project is subject to the AHPO is constructed within these flood zones, they would also be required to improve flood control facilities and issuance of Letters of Map Revision by FEMA to demonstrate improvement; or construct floor beams raised above the 100-year flood elevations. Additionally, these projects would be required to comply with the County’s municipal code for building with flood-prone areas. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(i) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that dam inundation areas span some unincorporated areas of all the County except the South Bay Planning Area; and parts of the Antelope – Fremont Valleys, Santa Clara, San Gabriel River, Santa Monica Bay, Los Angeles River, and San Pedro Channel Islands watersheds. Considering the relatively small proportional net increases in numbers of residents and workers that would be put at potential risk from dam inundation; the operation of most of the dams as flood control dams, not impounding large reservoirs most of the time; and safety requirements and inspections by the Division of Safety of Dams, the General Plan Update EIR found that impacts would be less than significant.

It is possible that AHPO projects could occur within dam inundation zones. However, as noted in the General Plan Update EIR, there is a relatively small proportional net increase in numbers of residents and workers that would be put in potential risk. Moreover, most of the dams are flood control dams subject to the safety requirements and inspections by the Division of Safety of Dams. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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(j) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to inundation by seiche, tsunami, or mudflow?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As analyzed in the General Plan Update EIR, parts of the County are subject to inundation by seiche, tsunami, or mudflow. Buildout of the General Plan Update would not subject substantially increased numbers of people or structures to tsunami flood hazards. Therefore, buildout of the General Plan Update would not subject substantially increased numbers of people or structures to tsunami flood hazards. Impacts would be less than significant.

Geotechnical investigations would be required for the development of structures for human occupancy pursuant to the General Plan Update. Where such geotechnical investigations identified mudflow hazard areas in or next to the sites of proposed structures or other improvements, the geotechnical investigations would include recommendations for minimizing such hazards. Compliance with recommendations of geotechnical investigations is required under the County Grading Code, Title 26, Appendix J of the County Code. Impacts would be less than significant after compliance with recommendations in geotechnical investigations.

The presence of a potential landslide hazard will be determined at the project level. The only unincorporated area in a tsunami hazard zone is Marina del Rey, which is already built-out with high-density housing and is subject to the Marina del Rey Local Coastal Program, which contains analysis and policies governing assessment of tsunami and seiche risk. Further, Marina del Rey would not be subject to the AHPO as it has a Specific Plan with an affordable housing requirement and mobilehome parks are not a permitted use. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.10 LAND USE AND PLANNING

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the potential to physically divide an existing community?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update identifies proposed and planned roadways in Los Angeles County. At a programmatic level, the General Plan Update does not allow land uses patterns that would result in division of an established neighborhood or community. Although policy maps included in the Land Use and Mobility Elements of the General Plan identify locations for Transit Oriented Districts, highways, and transit projects, these changes and improvements are not anticipated to divide established neighborhoods. Impacts would be less than significant.

The AHPO requires one-for-one replacement of any lost affordable housing units. Projects subject to the AHPO are anticipated to be generally consistent with the existing zoning and the allowable densities specified in the General Plan Land Use Element and DBO; any proposed zone change would require discretionary action. Any projects that are not consistent with zoning or the General Plan land use designation (and therefore with the potential to disrupt an existing neighborhood) would be subject to the County process for zone changes or General Plan amendments. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The General Plan Update EIR concluded that the General Plan Update would not conflict with goals contained within SCAG's 2012–2035 RTP/SCS or other land use plans. Therefore, impacts related to compatibility between the General Plan Update and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant.

Projects developed under the AHPO would be subject to environmental review for consistency with local land use plans, goals, and policies, some of which may call for more affordable housing. The AHPO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by maintaining the existing supply of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable habitat conservation plan or natural community conservation plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that the General Plan Update would not conflict with adopted habitat conservation plans. Although buildout of the General Plan Update would include development and redevelopment in areas covered by conservation plans, such development would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.

As described in **Section 3.4 Biological Resources** any AHPO project developed in an area covered by conservation plans would be required to comply with provisions of those plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.11 MINERAL RESOURCES

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that implementation of the General Plan Update would cause the loss of availability of a known mineral resource in the Antelope Valley Planning Area but not in the other 10 Planning Areas. No mitigation measures are available that would reduce impacts of buildout from the General Plan to less than significant. The General Plan Update EIR found that mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. The General Plan Update EIR found that compensatory mitigation outside of the region was infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate. The General Plan Update EIR found impacts to be significant and unavoidable.

Buildout of the General Plan Update would not substantially reduce the regional availability of oil and natural gas, and it would not render any large oil fields completely inaccessible. Furthermore, development of residential, commercial, and other urban uses does not preclude the continued use of nearby oil wells. Therefore, the geographic scope of areas available for the extraction of oil and natural gas are not expected to be dramatically reduced by implementation of the General Plan Update. The General Plan Update EIR found impacts to oil and gas to be less than significant.

The AHPO would not substantially reduce the regional availability of oil and natural gas. While AHPO projects could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the AHPO are currently in use as mineral extraction. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new greater impacts would occur.

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(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the General Plan Update would cause a substantial loss of availability of mineral resources in one mineral extraction area: the Little Rock Wash area in the Antelope Valley Planning Area. The General Plan Update EIR found no mitigation measures that would reduce impacts of buildout from the General Plan Update to less than significant. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate. The General Plan Update EIR found impacts to be significant and unavoidable.

The AHPO would not affect mineral resource zones or otherwise result in the loss of locally important mineral resources. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.12 NOISE AND VIBRATION

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that anticipated development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise

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environment. It also found that construction activities such as the transport of workers and movement of materials to/from work sites could incrementally increase noise levels along local access roads. Furthermore, the General Plan Update EIR found that demolition, site preparation, grading, and/or physical construction would result in temporary increases in the ambient noise environment in the vicinity of each individual project. Implementation of policies within the General Plan Update would reduce traffic noise impacts to existing noise sensitive uses to the extent feasible. However, no additional feasible mitigation measures are available to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within Los Angeles County that would be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site traffic noise impacts to existing uses (such as through the construction of sound walls and/or berms) may often be out of proportion with the level of impact. The General Plan Update EIR found impacts to be significant and unavoidable.

AHPO projects could generate some construction noise and could expose residents to sources of noise. However, construction activities are subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. The AHPO could lead to an incremental increase in the size of a project. However, this incremental increase would not generate significant amounts of noise compared to other types of uses. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Traffic associated with development under the AHPO would be within the assumptions made and analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that development could create elevated levels of groundborne vibration and groundborne noise; both in the short-term (construction) and the long-term (operations). Vibration impacts may occur from construction equipment associated with development in accordance with the General Plan Update. **Mitigation Measure N-3** (train-related vibration), would reduce potential train-related vibration impacts to new uses below the thresholds (i.e., below 0.08 RMS in/sec for residential uses). **Mitigation Measure N-4** (construction-related vibration) would reduce vibration impacts associated with construction activities to the extent feasible. **Mitigation Measure N-5** (industrial-related vibration) would reduce potential vibration impacts from industrial uses to less-than-significant levels. The General Plan Update EIR found that due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts would be significant and unavoidable.

The AHPO is not anticipated to result in significant generation of groundborne vibration or groundborne noise levels in excess of County standards. AHPO projects are primarily expected to be located in zones that allow housing. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not induce the development of industrial land uses typical of excessive groundborne vibration or groundborne noise levels. However, construction of AHPO projects could result in short-term ground-borne vibration or groundborne noise levels and would be required to implement **Mitigation Measure N-4**, consistent with the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that forecast development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment. New noise-sensitive land uses associated with the General Plan Update could be exposed to elevated noise levels from mobile sources along roadways. Implementation of the noise-related policies contained within the General Plan Update in addition to **Mitigation Measure N-2**, which includes an acoustic analysis to develop design recommendations, would reduce exterior noise compatibility impacts. While interior noise levels are required to achieve the 45 dBA CNEL interior noise limit of Title 24 and Title 25, exterior noise levels may still exceed the County noise land use compatibility criteria, despite exterior noise attenuation (i.e., walls and/or berms). The General Plan Update EIR found impacts related to exterior noise compatibility due to increased traffic noise to be significant and unavoidable.

AHPO projects would generate traffic that could incrementally contribute to elevated noise levels from mobile sources along roadways. To the extent that projects exacerbate impacts such impacts would be considered significant. However, most projects would result in a less than significant contribution to traffic and therefore noise. Projects would be required to implement **Mitigation Measure N-2** and are required to achieve interior noise limits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The General Plan Update EIR indicates that construction activities associated with any individual development may occur near noise-sensitive receptors and, depending on the project type noise, disturbances may occur for prolonged periods of time. **Mitigation Measure N-1**, which requires installation of temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing non-essential idling of construction equipment to no more than five minutes, would reduce impacts associated with construction activities to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts construction noise would be significant and unavoidable.

AHPO projects could generate elevated noise levels from construction activities in some locations. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Projects would be subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not induce the development of industrial land uses, which tend to generate the most significant noise impacts. Additionally, the projects would be required to implement the General Plan's **Mitigation Measure N-1**, which would reduce impacts associated with construction activities to the extent feasible. Existing noise levels on sites where projects are most likely to occur is anticipated to be generally urban and in proximity to transit. Noise impacts would be temporary and typical for construction activity, which is allowable in urban areas and therefore reasonably anticipated to occur. In addition, all stationary equipment (primarily anticipated to be HVAC equipment) would be required to comply with county regulations to ensure noise levels do not exceed ambient noise level standards. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?**
- (f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The General Plan Update EIR explains that development is required to be consistent with any applicable Airport Land Use Compatibility Plan (ALUCP) constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that development would not conflict with airport land use plans. Therefore, future development under the General Plan Update would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels (and would not exacerbate existing impacts).

AHPO projects would be required to comply with policies included in the Land Use Element and Noise Element of the General Plan to ensure that development would not conflict with airport land use plans. The AHPO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.13 POPULATION AND HOUSING

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to induce substantial 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)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that the General Plan Update would directly result in population growth in the County. According to the General Plan Update EIR, estimated buildout population of Los Angeles County is 2,356,890 residents, which is expected to occur sometime after 2035. The mixture of land uses and densities anticipated for General Plan Update buildout can accommodate the growth projected by SCAG for 2035. The General Plan accommodates up to 659,409 housing units, and although buildout is not expected to occur by 2035, the opportunities for housing development provided in the General Plan Update are consistent with SCAG growth projections for 405,500 units by 2035. The housing and population growth allowed under the General Plan Update is consistent with SCAG projections and do not constitute a significant adverse environmental impact.

Under the General Plan Update, the Antelope Valley Planning Area goes from an existing jobs-housing ratio of 1.29 to 0.18 at buildout, which is very housing-rich. This would be considered a significant impact without mitigation. **Mitigation Measure PH-1**, which requires the County to identify land use changes to

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achieve a minimum jobs-housing ratio of 1.30 for the Antelope Valley Planning Area, would reduce potential impacts to population and housing to a level that is less than significant.

The AHPO requires replacement of lost affordable housing units. The AHPO is not anticipated to result in a substantial increase in population as it aims to maintain the existing affordable housing stock in the County. The effects of the AHPO on population growth would be minimal and well within the assumptions of the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that existing uses would continue even where new zoning and land use designations are proposed. None of the existing uses would be forced to be removed or relocated as a result of the project implementation. Compliance with the Housing Element would facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate the RHNA and maintain an inventory of housing opportunities sites. Therefore, the General Plan Update EIR found no significant impacts.

The AHPO requires replacement of lost affordable housing units. The purpose of the AHPO is to preserve the existing affordable housing stock in Los Angeles County. As described in the Project Description, the AHPO would work with other housing related ordinances under consideration (Inclusionary Housing, Density Bonus, Interim and Supportive, By Right Housing) to ensure that new residential projects set aside a percentage of units for affordable housing. The AHPO would not result in displacement of existing housing as it does not incentivize development. Rather, it seeks to alleviate the loss of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.14 PUBLIC SERVICES

- (a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 following public services :

- Fire protection and emergency response
- Police Protection
- Schools
- Parks
- Other Public Facilities

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Fire Protection and Emergency Response

The General Plan Update EIR concludes that buildout of the General Plan Update would introduce new structures, residents, and employees into the LACoFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel. To maintain or achieve acceptable travel time standards for fire protection, it is reasonably foreseeable that the provision of new or physically altered fire facilities would be required, which would have the potential to result in adverse environmental impacts. The General Plan Update EIR found that **Mitigation Measures PS-1, PS-2, and PS-3** would reduce potential impacts associated with fire protection. **Mitigation Measure PS-1** would require developers to pay developer fees to the LACoFD. **Mitigation Measure PS-2**, would ensure that each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. **Mitigation Measure PS-3** would require that a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area. These mitigation measures would reduce impacts to a less than significant level.

The replacement requirements of the AHPO do not apply within VHFHSZs. AHPO projects are generally anticipated to occur in urbanized areas zoned for residential uses. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by fire protection services. The AHPO does not increase development beyond what is already anticipated under buildout of the General Plan Update. Therefore, consistent with the General Plan Update EIR, implementation of **Mitigation Measures PS-1, PS-2, and PS-3** would reduce

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any potential impacts associated with projects subject to the AHPO. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Law Enforcement

The General Plan Update EIR found that development would introduce new structures, residents, and employees into the LASD service boundaries, thereby increasing the requirement for law enforcement facilities and personnel. The majority of new development pursuant to the General Plan Update would occur in the Santa Clarita Valley and Antelope Valley Planning Areas. A mitigation fee has been adopted for the Santa Clarita Valley but at the time of the General Plan Update EIR, no mitigation fee had been adopted for the Antelope Valley Planning Area. The General Plan Update EIR found that **Mitigation Measure PS-4**, which requires that the County identify an implementation program to ensure adequate funding is available to provide law enforcement services within the Antelope Valley Planning Area, would reduce potential impacts associated with law enforcement to a less than significant level.

Similar to fire services, the projects subject to the AHPO are not expected to increase population, but rather to preserve the stock of affordable housing in the County. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by law enforcement. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

School Services

The General Plan Update EIR found that development would generate new students who would impact the school enrollment capacities of area schools. However, under state law, development projects are required to pay established school impact fees at the time of building permit issuance. The fees authorized for collection are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the increase in the demand for school facilities and services due to implementation of the General Plan Update would be adequately mitigated by the payment of associated fees. Impacts are less than significant.

The AHPO requires one-for-one replacement of any affordable housing units that are lost due to demolition or vacation as part of a project. The AHPO would not increase the overall population growth beyond what is anticipated in the General Plan Update EIR, nor would the ordinance substantially change the location of planned development. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by

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schools. Therefore, it is unlikely that additional schools would need to be constructed as a result of the AHPO. Projects subject to the AHPO would be required to pay established impact fees at the time of building permit issuance, which would adequately mitigate any impacts generated to school service. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Library Services

The General Plan Update EIR found that the General Plan Update would generate additional population, increasing the service needs for the local libraries. According to County Library staff, increased tax revenues funding addresses only library operations, and because of uncertainty regarding General Fund contribution levels, it is not adequate to offset the impact of the project on the County Library's ability to construct new libraries and purchase new items (books, periodicals, audio cassettes, videos, etc.). Consequently, the tax revenues collected would not adequately cover all the costs of serving the project population. In order to minimize potentially adverse effects, the County devised library facilities mitigation fee programs, and future residential projects would be required to remit payment pursuant to the County-wide program to account for library-related construction and acquisition costs. The General Plan Update EIR found that requiring payment of the library facilities fee in effect at the time development occurs would mitigate impacts to a less than significant level.

Similar to school services, AHPO projects are not expected to increase population, but rather to preserve the stock of affordable housing in the County. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by libraries. Therefore, it is unlikely that additional libraries would need to be constructed as a result of the AHPO. Regardless, consistent with the General Plan Update, projects subject to the AHPO would be required to pay the County's established library facility fee at the time of building permit issuance, which would adequately mitigate any impacts generated to libraries. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.15 RECREATION

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to 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?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that forecast development would generate additional residents that would increase the use of existing parks and recreational facilities but not to such an extent that substantial physical deterioration may occur or be accelerated.

According to the General Plan Parks and Recreation Element, all 11 Planning Areas face a deficit in local parkland totaling over 3,719 acres, and eight of the 11 Planning Areas have deficits in regional parkland. In 2016 the Department of Parks and Recreation completed the Countywide Parks and Recreation Needs Assessment which inventoried existing parks and recreational facilities in 188 study areas (including cities and unincorporated areas), quantified the need for additional park resources, and estimated the potential cost of meeting that need. Funding from a parcel tax approved in 2016 (Measure A) will be allocated locally by the Los Angeles County Regional Park and open Space District according to the population, square footage of improvement on parcels of land, and park need of each study area. Further, the General Plan Update EIR found that policies and programs would assure that funding for parkland acquisition would be proportional to increases in population and that impacts would be less than significant.

The AHPO would not induce population growth within the County; rather it would serve the forecast population by maintaining the number of units in the housing stock that are affordable. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by parks and recreation facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to including recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan EIR indicates that the anticipated increase in population would require the construction and expansion of new recreational facilities to serve the forecasted population growth in the unincorporated areas. Although the General Plan Update does not specifically site or plan recreational facilities, it would allow for the development of future recreational facilities, including parks, trails, athletic fields, and golf courses, within many of the land use designations, including residential and mixed-use.

Goals, policies, and actions in the General Plan Update including the creation of a County Parks and Recreation Master Plan, a trails program, and Parks Sustainability Program would guide the development of future recreational facilities. Existing federal, state, and local regulations would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails pursuant to buildout of the General Plan Update. Furthermore, subsequent environmental review would be required for development of park projects under existing regulations. Consequently, the General Plan Update EIR determined impacts would be less than significant.

As discussed above, the AHPO would not induce population growth and would preserve the affordable housing stock for the County. Projects subject to the AHPO would comply with existing federal, state, and local regulations regarding parks and recreational facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.16 TRANSPORTATION AND TRAFFIC

- (a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:
- (a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
 - (b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that buildout of the General Plan Update would impact levels of service on the existing roadway system. **Mitigation Measures T-1** through **T-5** would reduce these impacts. **Mitigation Measure T-1** would ensure projects are evaluated and traffic improvements identified to maintain minimum levels of service in accordance with the County’s Traffic Impact Analysis Guidelines. **Mitigation Measure T-2** would require the county to implement over time objectives and policies contained within the General Plan Mobility Element. **Mitigation Measure T-3** would require the county to participate on a potential Congestion Mitigation Fee program. **Mitigation T-4** directs the County secure the funding needed to implement the future planned improvements. **Mitigation Measure T-5** directs the County to work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent to unincorporated areas. These mitigation measures would reduce impacts; however, the impacted locations are still considered to be significant. Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County’s control (e.g., the County cannot undertake or require improvements outside of the County’s jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans’ approval). Therefore, the General Plan Update EIR determined impacts would be significant and unavoidable. [As further described below, the mitigation measures included in the General Plan EIR would no longer be applicable, as they aim to reduce level of service impacts.](#)

Since certification of the General Plan Update EIR, CEQA has been revised such that delay-based metrics including levels of service (and associated mitigation measures) are no longer required. Instead CEQA

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now requires that vehicle miles travelled (VMT) be the primary metric for evaluating transportation impacts. -As of July 4, 2020, the County of Los Angeles has updated their approach to traffic analyses and CEQA documentation to require consideration of VMT. -The County's new [traffic study/transportation impact analysis](#) requirements apply to environmental documents released for public review after July 1, 2020. ~~Consistent with the California Air Resources Board direction, the County intends to review individual development projects to determine whether VMT per capita would be reduced by 16.8% to meet the State's greenhouse gas reduction targets. Land use development projects will be compared to the applicable North or South County Baseline VMT metrics to determine if they are more than 16.8% below the current baseline VMT levels if the project:~~

- ~~1) Generates more than 110 trips per day, or~~
- ~~2) Includes more than 50,000 square feet of locally serving retail, or~~
- ~~3) Is located more than 1/2 miles from a bus or rail stop with service every 15 minutes during peak period.~~ Land use development projects will be analyzed on a project by project basis to determine if they comply with County transportation impact analysis guidelines.

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-If a land use development project is required to do a [traffic study/transportation impact analysis](#) and does not achieve the applicable ~~16.8%~~ VMT reduction target [for residential projects](#), mitigation options that reduce VMT must be explored.

[Under Senate Bill \(SB\) 743 and the County's new transportation impact analysis guidelines, projects that further the State's affordable housing goals are presumed to have a less than significant impact on VMT. The AHPO was drafted to address the County's affordable housing needs. As such, a presumption of less than significant impact on transportation can be made and no further analysis is required.](#)

~~The~~ AHPO requires replacement of lost affordable housing units and would preserve existing density in legally established mobilehome parks. The AHPO would not substantially change the location that development would occur; any replacement units constructed off-site are subject to locational requirements in the ordinance that are anticipated to result in such development being primarily located in urban areas in proximity to transit. The AHPO would not increase development beyond that evaluated in the General Plan Update EIR. In general, AHPO projects (other than mobilehome parks) are expected to be located in urbanized infill areas. Such areas are often but not exclusively in proximity to transit and/or walkable destinations. With respect to mobilehome parks, the proposed preservation of existing legally established parks that exceed current allowable density, would not increase VMT compared to existing conditions. The

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AHPO would not substantially change traffic impacts as compared to those that would occur under the General Plan Update; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update is not anticipated to result in the development of a new airport within Los Angeles County nor will it introduce new land uses that could prevent safety hazards to air traffic. Furthermore, policies of the General Plan Update are aimed at improving the compatibility between aviation facilities and their surroundings, encouraging greater multi-modal access to airports, and encouraging the development of a decentralized system of major airports. The General Plan Update EIR found impacts to be less than significant.

While the AHPO does not prohibit projects in the vicinity of an airport or flight path, these projects would be limited in number and therefore unlikely to significantly affect flight paths or air travel. Existing FAA regulations and the ALUCPs and are intended to identify and properly address potential airport hazards prior to implementation of specific projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that there would not be substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The General Plan Update promotes highways to be built to specific standards that have been set by the County.

~~These include increasing the number of lanes on major highways and other improvements under the~~

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~~Highway Plan~~ Hazards due to roadway design features will be evaluated on a project-by-project basis. All new highways and upgrades will be planned, designed, and built to County standards. The General Plan Update EIR found impacts to be less than significant.

Development associated with the AHPO is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The AHPO would not result in changes being made to the local roadways or impede public access on any public right-of-way. Therefore, implementation of the AHPO would have no impact related to design feature hazards. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to inadequate emergency access?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that development would not result in inadequate emergency access. For projects of sufficient size, discretionary review of emergency access is evaluated on a project-by-project basis. The General Plan Update EIR found that buildout will enhance the capacity of the roadway system by upgrading roadways and intersections when necessary, ensure that the future dedication and acquisitions of roadways are based on projected demand, and implement the construction of paved crossover points through medians for emergency vehicles. Additionally, the General Plan Update EIR found that the General Plan Update will facilitate the consideration of the needs for emergency access in transportation planning. The County will ~~maintain a current evacuation plan~~, ensure that new development is provided with adequate emergency and/or secondary access, including two points of ingress and egress for most subdivisions, require visible street name signage, and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. The General Plan Update EIR determined impacts to be less than significant.

The County has designated disaster routes as detailed in the Safety Element of the General Plan. Development, including that in accordance with the AHPO, could temporarily interfere with local and on-site emergency response. While road closures could occur as a result of construction activity, it is not anticipated that such closures would result in substantial delays to service providers.

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Any lane closures must be approved by the County and they would not be approved if substantial delays could result. Typically, the County requires a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Compliance with access standards, including the Haul Route Monitoring Program would reduce potential impacts on roadways designated as haul routes and emergency response services during construction of individual projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR found that the General Plan would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). The General Plan Update supports alternative modes of transportation, including walking and bicycling, to reduce total VMT. Additionally, the General Plan Update establishes several policies to ensure the safety and mobility of pedestrians and bicyclists. The County will provide safe and convenient access to safe transit, bikeways, and walkways, consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems, provide safe pedestrian connections across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations, adopt consistent standards for implementation of Americans with Disabilities Act requirements and in the development review process prioritize direct pedestrian access between building entrances, sidewalks and transit stops. The General Plan Update EIR determined impacts would be less than significant.

Development associated with the AHPO would be consistent with the underlying zoning for the site. Projects would continue to be consistent with General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.17 UTILITIES AND SERVICE SYSTEMS

Wastewater Treatment and Collection

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(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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According to the General Plan Update EIR, wastewater generation under the General Plan Update would not exceed wastewater treatment requirements of any of the four Regional Water Quality Control Boards having jurisdiction in Los Angeles County. General Plan Update implementation programs require Department of Regional Planning and the Department of Public Works (DPW) to jointly secure sources of funding and to set priorities for preparing studies to assess infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, the County will prepare a Capital Improvement Plan for each of the 11 Planning Areas. Each Capital Improvement Plan shall include a Waste Management Study and Stormwater System Study. General Plan Update policies also require the County to support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan Update encourages development, such as Transit Oriented Districts (TODs). Therefore, the General Plan Update EIR found that polices and required regulations would ensure impacts are less than significant.

Development associated with the AHPO would be well within the expected growth for the unincorporated County evaluated in the General Plan Update EIR and would not exceed RWQCB standards for treatment of wastewater or wastewater treatment capacity. Additionally, water conservation practices and compliance with best management practices (i.e., low flow toilets and automatic sinks), as well as Title 24 requirements, are likely to reduce wastewater generation. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (b) Would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- (c) Would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- (e) Would result in a determination by the wastewater treatment provider which serves or may serve the project that is has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR explains that projects are required to pay connection fees to the LACSD, or corresponding types of fees to the City of Los Angeles Bureau of Sanitation, as applicable. Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Antelope Valley and Santa Clarita Valley Planning Areas. The General Plan Update EIR determined there is sufficient wastewater treatment capacity in the remaining Planning Areas and impacts would be less than significant.

Wastewater. Development associated with the AHPO would not result in a net gain or loss of housing units; it would replace affordable units that are removed from the housing stock . Such development would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing sewer lines. Development in accordance with the AHPO would be required to comply with all applicable County regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Water. Water would be conveyed to projects along existing circulating water mains of varying sizes. Projects associated with the AHPO are anticipated to be generally located on land already developed with residential uses and served by water systems. The AHPO allows mobilehome parks to preserve their existing density, even if it exceeds the current allowable. Some mobilehome parks are connected to well water systems rather than the municipal system, but since no units would be added, no impacts would occur. Projects would be subject to Los Angeles County's Low Impact Development (LID) requirements, Los Angeles County's drought-tolerant landscaping requirements, and CALGreen construction requirements for low flow fixtures and other water conservation features. Development in accordance with the AHPO would be required to comply with water conservation requirements and ensure that adequate infrastructure exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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Stormwater. Development associated with the AHPO would not result in a net gain or loss of housing units; it would simply replace affordable units that are removed from the housing stock. Such development would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing storm drains. Development in accordance with the AHPO would be required to comply with all applicable County regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Water Supply and Distribution System

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

(d) Have sufficient water supplies available to serve the project from existing entitlements and resources, and new and/or expanded entitlements would be needed?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that adequate water supplies have been identified in the UWMP's for the County for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the General Plan Update, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. It is uncertain whether the water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035. **Mitigation Measures USS-1 through USS-23** would lower these impacts, however the General Plan Update EIR finds that impacts would be significant and unavoidable.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. It is unlikely to result in projects that would not have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources. Developments constructed as a result of the project are likely to be located on land previously developed with residential and served by water systems that would provide will-serve letters verifying water supply. Projects would be subject to LID requirements, drought-tolerant landscaping requirements, and CALGreen construction requirements for low-flow fixtures and water conservation features. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Solid Waste

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

- (f) Would be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?
- (g) Would not comply with federal, state, and local statutes and regulations related to solid waste?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR finds that generation of solid waste would increase as the population increases with buildout of the General Plan Update. Correspondingly, there would be a need for additional landfill capacity and related support facilities. Both the forecasted net increase in solid waste generation by General Plan Update buildout and the forecast total solid waste generation in unincorporated County areas at General Plan Update buildout are well within the total residual per day daily disposal capacity of the nine landfills analyzed in the General Plan Update EIR. The General Plan Update EIR concludes that buildout would not require construction of new or expanded landfills, and impacts are found to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. It is unlikely to result in projects that would significantly impact landfill capacity. As discussed elsewhere in this Addendum, AHPO projects are primarily anticipated to be located in urban areas already served by existing landfills. Projects that obtain planning and building approvals would be consistent with solid waste regulations and would not be expected to generate substantial amounts of solid waste. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Other Utilities

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

(h) Would increase demand for other public services or utilities?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Electricity

The General Plan Update EIR concludes that growth in the unincorporated areas would result in additional demand for electricity service. Presently and for the foreseeable future, the national and regional supply of electrical energy is not in jeopardy. The acceleration of the approval and licensing process of additional state power plants will ensure an adequate supply of electricity for state consumers. The General Plan Update EIR forecasted the net increase in electricity demand due to buildout is about 9.9 billion kWh per year, or about 10,300 GWH per year, and is within Southern California Edison's (SCE's) demand forecast for its service area. Therefore, the General Plan Update EIR finds impacts to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. Inclusionary housing projects are likely to be located on land previously developed with residential uses and served by existing electrical utilities. Projects would also be subject to Los Angeles County's Green Building Program and CALGreen, which promote energy efficiency. The AHPO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Natural Gas

The General Plan Update EIR indicates that buildout would result in demand about 192 million therms per year, that is, 51 million cubic feet of natural gas per day. Forecasted natural gas demands due to the General Plan Update are within Southern California Gas Company's (SCGC's) estimated supplies; therefore the General Plan Update EIR found impacts on natural gas supplies to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. Inclusionary housing projects are likely to be located on land previously developed with residential or commercial uses and served by existing natural gas utilities. Projects would also be

3.0 Environmental Analysis

subject to Los Angeles County's Green Building Program and CALGreen, which promote energy efficiency. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.18 CUMULATIVE IMPACTS

Cumulative projects are described in the **Chapter 1.0, Introduction, Section 1.7, Background and Planning History**.

Section 15130 of the *Guidelines* requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively significant. CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (*Guidelines* § 15355). "'Cumulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*Guidelines* § 15065(a)(3)).

The purpose of a cumulative analysis is to determine if several projects when evaluated together could result in a significant "cumulative" impact that would otherwise not be considered significant when projects are evaluated one at a time. If several projects considered together have the potential to result in a significant cumulative impact (that is not already identified as a significant project impact), the question becomes whether the project being analyzed would result in a "considerable" contribution to such a significant cumulative impact. Therefore, if a project results in a significant impact by itself, then its contribution to a cumulative impact is considerable. Mitigation measures that reduce project impacts would similarly reduce a project's contribution to cumulative impacts.

Cumulative impacts occur in one of two ways: 1) impacts from one project overlap with impacts from another project, 2) the other way that cumulative impacts occur is when a resource is of value to a broader community than just the immediate project vicinity, for example, impacts to a cultural or biological resource that has more than local significance, for example state or even national significance, impacts to such a resource would be cumulative with impacts to other resources of similar significance wherever they occur in the state or across the entire US.

The geographic area for evaluation of cumulative impacts is the area within which impacts of the General Plan Update, could overlap with impacts of other projects within the cities of Los Angeles County. The General Plan Update EIR evaluated cumulative projects and determined that during the planning period of the General Plan Update, cities in Los Angeles County are anticipated to grow by approximately 300,000 housing units and 1 million residents compared to existing conditions. This growth is in addition to

3.0 Environmental Analysis

development anticipated in the General Plan Update for unincorporated areas of the County – for 358,931 housing units and 1,290,479 residents (see **Chapter 2.0**).

The housing ordinances currently being prepared by Los Angeles County would work to facilitate the development analyzed in the General Plan Update EIR, with a focus on increasing housing options and affordability within the County. Although the housing ordinances have some common goals, they are not dependent on one another; each has independent utility.

The ordinances together are expected to result in the development of new housing that would be generally consistent at a County-level with the overall development assumptions analyzed in the General Plan Update EIR. As discussed throughout this addendum, the types of impacts that would generally be expected to occur are those that are common to housing projects, such as construction, and population related effects. The total number of units that are anticipated to be constructed as a result of the five ordinances would be well below the number evaluated in the General Plan Update EIR. The General Plan does not indicate how the projected units would get built, but rather provides the flexibility for the market to dictate how the total number of units would be ultimately constructed. The ordinances together would result in a small subset of the overall growth evaluated in the General Plan Update EIR and the impacts would be a similar subset of the impacts identified within the General Plan Update EIR. As such, even when combined, the ordinances would not result in a cumulatively considerable contribution to the impacts identified in the General Plan EIR, rather they are part of the overall development anticipated in the General Plan Update EIR and would facilitate that development rather than adding to it.

4.0 REFERENCES AND PREPARERS

4.1 REFERENCES

California Housing Partnership. Los Angeles County 2020 Affordable Housing Needs Report (May 2020). Available online at: https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2020/06/Los_Angeles_Housing_Needs_Report_2020-HNR.pdf, accessed June 16, 2020

Los Angeles County Department of Regional Planning (January 2018) Los Angeles County Affordable Housing Action Plan. http://planning.lacounty.gov/assets/upl/project/housing_la_ahap_action-plan.pdf

Los Angeles County, General Plan 2035 Programmatic EIR, Certified October 6, 2015 available at: <http://planning.lacounty.gov/generalplan/eir>

4.2 LIST OF PREPARERS

Impact Sciences, Inc., has prepared this environmental document under contract to the County of Los Angeles. Persons directly involved in the review and preparation of this report include:

County of Los Angeles, Department of Regional Planning (Lead Agency)

Tina Fung, ~~Senior Regional Planning Assistant~~ Supervising Regional Planner
Connie Chung, Assistant Administrator, Advance Planning Division
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Sirius Environmental

Wendy Lockwood, Principal

**SUMMARY OF PROCEEDINGS
REGIONAL PLANNING COMMISSION
AIRPORT LAND USE COMMISSION
AFFORDABLE HOUSING PRESERVATION ORDINANCE
PROJECT NO. 2020-000307**

July 29, 2020 Regional Planning Commission Hearing

At the public hearing on July 29, 2020, staff provided an overview of the Draft Ordinance. Staff presented the major elements and key components of the Draft Ordinance. Staff also recommended revisions to the Draft Ordinance for clarification purposes and based on stakeholder input.

Discussion

Four individuals testified at the hearing. One individual representing the Acton Town Council expressed concern that the Draft Ordinance does not provide protections for a legal nonconforming mobilehome park in Acton and would restrict home-based businesses in mobilehome parks. The individual also expressed support for the requirement for a Conditional Use Permit for mobilehome parks, and concern over the Regional Planning Commission's (RPC) recent approval of the Interim and Supportive Housing Ordinance. A representative of the Building Industry Association testified, citing concerns about the lack of flexibility in the Draft Ordinance related to the affordable housing replacement fee option; requirements for equity share with the County when affordable units are sold; the requirement to replace affordable units one-for-one regardless of affordability level; and fees, including affordable housing monitoring fees. In addition, an individual representing Eastside LEADS testified, requesting changes to the Draft Ordinance to limit the options for offsite affordable housing replacement; amend offsite requirements to provide a greater number of affordable units than onsite; incentivize the use of the community land trust option; and apply the Draft Ordinance to substantial rehabilitations. Finally, another individual representing Strategic Actions for a Just Economy (SAJE) testified, expressing appreciation for the RPC's concerns regarding condominium conversions and echoing Eastside LEADS' campaign and mission. Staff provided the RPCRPC with two written comments, which covered questions about consistency with the Interim and Supportive Housing Ordinance to support with recommended changes.

During the discussion, the RPC directed staff to amend the locational requirements for offsite affordable housing replacement units to prioritize their location to be as close to the principal project as possible. The RPC also requested a report every six months on the number of condominium conversions filed in the unincorporated areas.

The RPC closed the public hearing, and voted unanimously to recommend approval of the Draft Ordinance, with revisions recommended by staff, to the Board of Supervisors.

August 5, 2020 Airport Land Use Commission Hearing

At the public hearing on August 5, 2020, the Airport Land Use Commission found that the Draft Ordinance is consistent with the adopted Los Angeles County Airport Land Use Plan, General William J. Fox Airfield Land Use Compatibility Plan, and Brackett Field Airport Land Use Compatibility Plan. There were no speakers or comments from the Commission.

**RESOLUTION
REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES
PROJECT NO. PRJ2020-000307
ADVANCE PLANNING CASE NO. RPPL2020001473
ENVIRONMENTAL ASSESSMENT NO. RPPL2020001474**

WHEREAS, the Regional Planning Commission of the County of Los Angeles ("Commission") conducted a duly noticed public hearing on July 29, 2020 to consider amendments to Title 8 (Consumer Protection, Business and Wage Regulations), Title 21 (Subdivisions), and Title 22 (Planning and Zoning) of the Los Angeles County Code ("County Code") to) to preserve the County's supply of existing affordable housing in the unincorporated areas of Los Angeles County ("County"); and

WHEREAS, the Commission finds as follows:

1. The preservation of affordable housing is a key strategy in the County's affordable housing and homelessness prevention efforts;
2. The County Board of Supervisors ("Board") approved a motion in February 2018 instructing the County Department of Regional Planning ("Department") to prepare an ordinance to preserve existing affordable housing units, both income-restricted as well as unsubsidized "naturally occurring affordable housing," that considers a variety of anti-displacement strategies, such as the regulation of condominium conversions and mobile home park closures, and one-for-one replacement or "no net loss" policies;
3. The stock of affordable housing that is at risk of becoming market-rate is significant;
4. There are State laws to which the County is subject that preserve the supply of affordable housing;
5. Senate Bill (SB) 330 (Skinner), which took effect January 1, 2020, requires housing development projects to replace affordable units and rent-stabilized units withdrawn from the rental market prior to submittal of a development application;
6. Under the proposed Ordinance, certain projects must replace rental dwelling units on the site that are proposed to be or have been demolished, vacated, or converted from rental to for-sale, with income-restricted affordable rental dwelling units. Rental dwelling units must be replaced if they are any of the following:
 - a. Subject to a recorded covenant that restricts rents to levels affordable to moderate, lower, very low, or extremely low income households within the five years prior to application submittal;

**REGIONAL PLANNING COMMISSION
PROJECT NO. PRJ2020-000307
RESOLUTION**

- b. Rent-stabilized pursuant to County or State regulations within the five years prior to application submittal;
 - c. Occupied by lower, very low or extremely low income tenants within the five years prior to application submittal; or
 - d. Withdrawn from rent or lease pursuant to Chapter 12.75 (commencing with Section 7060) of the California Government Code (known as the Ellis Act) within the 10 years prior to application submittal;
- 7. The proposed Ordinance provides flexibility in meeting the replacement requirement, including through off-site construction, and the payment of a replacement fee;
 - 8. The proposed Ordinance requires rental replacement units to remain affordable for 99 years, subject to a recorded covenant. For for-sale affordable replacement units, the initial sale is restricted to eligible buyers and requires an equity-sharing agreement with the County;
 - 9. The proposed Ordinance requires notification of planned condominium conversions to organizations qualified to preserve affordable rental housing;
 - 10. The proposed Ordinance removes barriers to the continued operation of existing mobilehome parks;
 - 11. The proposed Ordinance clarifies that a Conditional Use Permit (CUP) is the mechanism for permitting the mobilehome park use and for modifying development standards, and removes an additional requirement for a Variance to modify standards;
 - 12. The proposed Ordinance clarifies that the tool for modifying density is the Density Bonus and Housing Permit;
 - 13. For existing mobilehome parks that exceed the underlying permitted density, the proposed Ordinance creates a Mobilehome Park Density Bonus, which deems the existing total number of mobilehome spaces as the maximum number of dwelling units permitted on-site, subject to the approval of an Administrative Housing Permit;
 - 14. The proposed Ordinance permits existing legal nonconforming mobilehome parks with a CUP in industrial zones;

**REGIONAL PLANNING COMMISSION
PROJECT NO. PRJ2020-000307
RESOLUTION**

15. The proposed Ordinance waives planning and zoning filing fees for mobilehome parks;
16. The proposed Ordinance allows legal nonconforming mobilehome parks to rebuild like-for-like if they are damaged or destroyed, and removes limits on the value of maintenance work for them;
17. The proposed Ordinance is consistent with and supportive of the goals and policies of the County General Plan ("General Plan"), and in particular, the Housing Element, in that it promotes a diversity of housing types and the conservation of existing affordable housing stock that is at risk of converting to market-rate housing in the unincorporated areas of the County;
18. At the public hearing, staff from the Department recommended additional edits to the draft Ordinance for clarity and consistency and to address additional comments from stakeholders;
19. At the public hearing, the Commission directed staff to amend the draft Ordinance to prioritize affordable replacement units being as close to the principal project as to possible;
20. Pursuant to Section 22.222.180 of the County Code, a public hearing notice was published in 12 local newspapers countywide, including the Spanish language newspaper *La Opinión*; and
21. An Addendum to the certified Los Angeles County General Plan Update Final Environmental Impact Report ("General Plan Update EIR") was prepared in compliance with CEQA and the County environmental guidelines. The Addendum concludes that the Ordinance as proposed would not result in any increased or additional environmental impacts beyond those that were analyzed in the General Plan Update EIR, and therefore concluded that a supplemental environmental analysis is not required. The Commission finds that the proposed amendments to Title 8 (Consumer Protection, Business and Wage Regulations), Title 21 (Subdivisions) and Title 22 (Planning and Zoning) will not result in an increased or additional environmental impact beyond those that were analyzed in the General Plan Update EIR pursuant to CEQA, the CEQA Guidelines and the County Environmental Document Procedures and Guidelines.

THEREFORE, BE IT RESOLVED THAT the Regional Planning Commission recommends to the Board of Supervisors of the County of Los Angeles as follows:

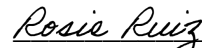
1. That the Board certify completion of, and adopt, the Addendum to the certified General Plan Update EIR and find that the proposed amendments

**REGIONAL PLANNING COMMISSION
PROJECT NO. PRJ2020-000307
RESOLUTION**

to Title 8 (Consumer Protection, Business and Wage Regulations), Title 21 (Subdivisions) and Title 22 (Planning and Zoning), will not result in an increased or additional environmental impact beyond those that were analyzed in the General Plan Update EIR;


2. That the Board hold a public hearing to consider the proposed amendments to Title 8 (Consumer Protection, Business and Wage Regulations), Title 21 (Subdivisions) and Title 22 (Planning and Zoning), to preserve the supply of existing affordable housing in the unincorporated areas of the County; and
3. That the Board adopt an ordinance containing the proposed amendments to Title 8 (Consumer Protection, Business and Wage Regulations), Title 21 (Subdivisions) and Title 22 (Planning and Zoning), and determine that the amendments are compatible with and supportive of the goals and policies of the County General Plan.

I hereby certify that the foregoing resolution was adopted by a majority of the voting members of the Regional Planning Commission of the County of Los Angeles on July 29, 2020.



Rosie O. Ruiz, Secretary
Regional Planning Commission
County of Los Angeles

APPROVED AS TO FORM: OFFICE OF THE COUNTY COUNSEL

By  for _____
Elaine Lemke
Assistant County Counsel

County of Los Angeles



COUNTY OF LOS ANGELES
AIRPORT LAND USE COMMISSION

August 6, 2020

Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Tina Fung:

**LOS ANGELES COUNTY AFFORDABLE HOUSING PRESERVATION ORDINANCE
PROJECT NO. PRJ2020-000307-(1-5)
AVIATION CASE NO. RPPL2020002041**

On August 5, 2020, the Airport Land Use Commission (ALUC) conducted a public hearing relating to the above referenced project for consistency with the adopted Los Angeles County Airport Land Use Plan (ALUP), General William J. Fox Airfield Land Use Compatibility Plan (Fox ALUCP), and Brackett Field Airport Land Use Compatibility Plan (Brackett ALUCP). The ALUC found the project consistent with the ALUP, Brackett Field ALUCP, and Fox ALUCP. Enclosed for your reference is a copy of the ALUC's final Findings and Order.

If you have any questions regarding this matter, please contact Alyson Stewart at (213) 974-6432 or via email at astewart@planning.lacounty.gov.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP
Director

Bruce Durbin Digitally signed by Bruce Durbin
Date: 2020.08.06 12:53:01 -07'00'

Bruce Durbin, Supervising Regional Planner
Ordinance Studies Section

Enclosure: Findings of the Airport Land Use Commission

BD:as

**DRAFT FINDINGS AND ORDER OF THE COUNTY OF LOS ANGELES
AIRPORT LAND USE COMMISSION**

ALUC REVIEW OF THE AFFORDABLE HOUSING PRESERVATION ORDINANCE

COMMISSION HEARING DATE: August 5, 2020

SYNOPSIS

The Airport Land Use Commission (ALUC) is conducting a consistency review of the Los Angeles County Affordable Housing Preservation Ordinance (Ordinance), a countywide ordinance. ALUC review is necessary because the Ordinance is a legislative action affecting property within the ALUC's planning boundaries, also known as the Airport Influence Areas (AIA) surrounding the fifteen airports in Los Angeles County.

ALUC's consistency determination focuses on how the Ordinance will impact the surrounding land uses of the fifteen airports in Los Angeles County, and how it will relate to the policies contained in the Los Angeles County Airport Land Use Plan (ALUP), the General William J. Fox Airfield Land Use Compatibility Plan, and the Brackett Field Airport Land Use Compatibility Plan.

PROCEEDINGS BEFORE THE AIRPORT LAND USE COMMISSION: Staff presented on the analysis regarding the Affordable Housing Preservation Ordinance (Project) for consistency with the three Airport Land Use Compatibility Plans. Staff recommended the ALUC to find the Project consistent with all the County ALUP, Fox ALUCP, and Brackett Field ALUCP. There was no public testimony. With no further discussion, ALUC closed the hearing and moved to find the Project consistent with the County ALUP, Fox Airfield ALUCP, and Brackett Field ALUCP.

FINDINGS

1. The State Aeronautics Act Section 21670, et seq. of the California Public Utilities Code ("PUC") requires every county in which there is an airport served by a scheduled airline to establish an Airport Land Use Commission.
2. Pursuant to Section 21670.2 of the PUC, the Los Angeles County Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission for Los Angeles County and thereby coordinating the airport planning of public agencies within the County.
3. Pursuant to Section 21670(a)(1) of the PUC the purpose of the State Aeronautics Act that establishes Airport Land Use Commissions is to provide for the orderly development of each public use airport and the area surrounding these airports and to prevent the creation of new noise and safety problems.
4. Pursuant to Section 21674 of the PUC, the powers and duties of an Airport Land Use Commission include: assisting local agencies in ensuring compatible land uses in the vicinity of new and existing airports; coordinating planning at the state, regional and local levels so as to provide for the orderly development of air transportation; preparing and adopting Airport Land Use Compatibility Plans; and reviewing plans of local agencies to determine whether such plans are consistent with the applicable Airport Land use Compatibility Plan.
5. In 1991 the County ALUC adopted the Los Angeles County Airport Land Use Plan, which is known as the Airport Land Use Compatibility Plan ("ALUCP") that sets forth policies,

purposes, maps with planning boundaries, and criteria for promoting compatibility between airports and the land uses that surround them.

6. The ALUCP provides for the orderly development of Los Angeles County's public use airports and the area surrounding them. The ALUCP contains policies and criteria, including a 65 dB Community Noise Equivalent Level (CNEL) contour, that minimize the public's exposure to excessive noise and safety hazards. This contour is the planning boundary, also called the Airport Influence Area (AIA), for each airport.
7. Pursuant to Sections 21674(d), 21676(b), 21672(c), 21661.5, 21664.5(a), and 21664.5(b) of the PUC, the County ALUC has the responsibility to review for consistency with the ALUCP, airport master plans, specific plans, general plan amendments and zoning ordinances for consistency with the adopted ALUCP, before final action is taken by the local agency.
8. Pursuant to Sections 21670(a)(2) and 21674(a), the ALUC has no authority over existing land uses regardless of whether such uses are incompatible with airport activities.
9. On December 1, 2004, the Los Angeles County ALUC adopted the General William J. Fox Airfield Land Use Compatibility Plan for General William J. Fox Airfield. This Compatibility Plan sets forth policies, a planning boundary, intensity and density criteria for promoting compatibility between the airport and the surrounding land uses.
10. On December 9, 2015, the Los Angeles County ALUC adopted the Brackett Field Airport Land Use Compatibility Plan for Brackett Field Airport. This Compatibility Plan set forth policies, a planning boundary, intensity and density criteria for promoting compatibility between the airport and the surrounding land uses.
11. The Ordinance requires no net loss of affordable housing units when a residential development is being demolished, vacated, converted to another use, or converted from rental to for-sale, require additional filing materials for condominium conversions, and preserve existing nonconforming mobilehome parks.
12. The Ordinance potentially affects unincorporated areas within the Airport Influence Areas of Los Angeles International Airport, Palmdale Regional Airport, Fox Airfield, and Brackett Field Airport. The properties within the AIA of these airports are in zones covered by the Ordinance.
13. The County ALUP's Land Use Compatibility Table advises that new residential development should be avoided within 70 dB or greater CNEL contours per ALUP Policy G-1 and N-3, and expansion of any existing residential development may be permitted provided that no net units are added.
14. The Ordinance may impact multifamily residences within the unincorporated areas within the AIA of Los Angeles International Airport, however, ALUC policy is to allow for one-to-one replacement of dwelling units when affordable housing units are required to replace any residential uses that are demolished, vacated, or converted, even in areas within the 70 dB CNEL contour. Additional units beyond the one-to-one replacement may be subject to ALUC review. No mobilehome parks exist in any of the AIAs covered by the ALUP.
15. The Ordinance does not authorize development of a land use that would generate electrical interference, direct a steady or flashing light, attract large concentrations of birds or emit smoke. The Ordinance also does not propose changes to existing height limits for the zones. Therefore, the Ordinance is consistent with County ALUP Safety Policies.

16. Most of the unincorporated properties are within Compatibility Zones D and E within Fox Airfield's AIA for which there are no development restrictions. The remaining properties that fall within Compatibility Zone C are within a mobilehome park that is nonconforming to density, in which the Ordinance will cap its current density as the maximum. The ALUCP does not evaluate existing development but may evaluate future expansions of such development. The Ordinance is consistent with Fox Airfield ALUCP.
17. All the unincorporated properties are within Compatibility Zone E within Brackett Field's AIA for which there are no development restrictions; therefore, the Ordinance is consistent with Brackett Field ALUCP.
18. ALUC reviewed the proposed Los Angeles County Affordable Housing Preservation Ordinance on August 5, 2020 and found the Ordinance to be consistent with the policies of the County ALUP, Brackett Field ALUCP, and Fox Airfield ALUCP.

CONCLUSION:

Based on the foregoing, the Airport Land Use Commission concludes that the Affordable Housing Preservation Ordinance is consistent with the Los Angeles County Airport Land Use Plan, the General William J. Fox Airfield Land Use Compatibility Plan, and the Brackett Field Airport Land Use Compatibility Plan.

VOTE:

Concurring: Modugno, Moon, Shell, Louie, and Smith

Dissenting: None

Abstaining: None

Absent: None

ACTION DATE: August 5, 2020



MEMORANDUM

To: Ayala Scott and Tina Fung, County of Los Angeles
From: Darin Smith
Subject: Affordable Housing Off-Site Replacement Fee; EPS #194048
Date: June 2, 2020

In 2018, the Los Angeles County Board of Supervisors directed the Department of Regional Planning (DRP) to “prepare an ordinance to preserve existing affordable housing units, both income-restricted as well as ‘naturally occurring affordable housing,’ such as . . . one-for-one replacement or ‘no net loss’ policies.” Since that Board direction, the State of California passed SB 330, the “Housing Crisis Act of 2019,” which limits the demolition of affordable and rent-controlled apartments by requiring their one-for-one replacement.

DRP has retained Economic & Planning Systems (EPS) to calculate the maximum fee that can be charged to a property owner or developer who removes an existing affordable or rent-controlled unit but does not construct a replacement unit. The maximum fee calculation is based on the subsidy required to build a replacement affordable unit for any existing affordable rental unit that is removed from the County’s housing stock through demolition, conversion to condominiums, or substantial renovation that increases their market rental rates.

For this analysis, EPS has referred to previous work conducted by Keyser Marston Associates (KMA) in 2018 meant to inform the County’s consideration of an inclusionary housing program as part of an overall Affordable Housing Action Plan. Working with County staff and consultants from HR&A who are conducting a parallel study of the County’s inclusionary housing policy, EPS has refined the programmatic assumptions and calculations. The results are intended to reflect contemporary market conditions regarding development costs and values for prototypical housing developments occurring in the County.

Summary of Findings

This analysis has led to the following findings:

1. **The maximum fee is calculated as the subsidy that would be required to replace an existing affordable unit.** If the County seeks to require one-for-one replacement of affordable units and the party removing such a unit does not provide a replacement, the

County may seek monetary compensation adequate to subsidize the construction of a new unit. The subsidy is calculated as the cost to construct a new affordable unit less its value as an income-restricted unit.

2. **The County is economically diverse and a single approach to this issue may not adequately reflect disparate conditions in different subareas.** The types of housing being developed in different parts of the County vary. The different housing types have different development costs, and land values also vary by location. As such, the cost to subsidize a new affordable unit varies by location.
3. **The full subsidy of producing a replacement unit varies widely, as do the maximum fees that can be considered.** Figure 1 summarizes the maximum supportable replacement fees and indicates that the cost of subsidy may be as low as \$129,000 per unit in the Antelope Valley, and nearly \$320,000 in the Coastal South area.

Figure 1 Summary of Maximum Supportable Fees by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Cost per Replacement Unit	\$252,930	\$425,095	\$273,342	\$421,592	\$324,291	\$336,834
Value per Replacement Unit	<u>\$123,460</u>	<u>\$106,180</u>	<u>\$119,048</u>	<u>\$129,315</u>	<u>\$92,931</u>	<u>\$108,718</u>
Subsidy (Fee) per Unit Lost	\$129,470	\$318,914	\$154,294	\$292,277	\$231,360	\$228,116
Avg. SqFt per Unit Lost	900	921	885	1,090	860	844
Avg. Fee/SqFt per Unit Lost	\$144	\$346	\$174	\$268	\$269	\$270

Source: EPS

4. **Feasibility testing suggests that displacement of existing income-restricted or naturally occurring affordable housing due to renovation, condominium conversion or demolition and replacement is likely to be relatively rare.** Even at their low rents and related income streams, most properties appear to be worth more to their owners in their current state than the owners could generate by investing substantially in their renovation, conversion to condominiums, or demolition and replacement with marginally more new units at higher values than the existing units. This result occurs because the substantial costs associated with these actions limit the net proceeds from the investment, and owners would generate more income with less risk by retaining the units.
5. **Requiring mitigation through replacement of units or payment of an associated fee is likely to represent a significant deterrent to the loss of lower-priced apartments in Los Angeles County.** In EPS's estimation, only properties for which values (rents or condominium prices) can be dramatically increased with relatively little investment are likely to undergo such transformations. This may occur in particularly high-priced areas such as the Coastal South or San Gabriel submarkets. In such areas, requiring the replacement of lower-priced units – either through on-site replacement or payment of a fee sufficient to fully subsidize the construction of a replacement unit off-site – will represent a major addition to development costs that will likely limit the feasibility of such property transformations. As such, the one-for-one replacement policy and related fee program can be expected to advance the County Supervisors' "no net loss" policy objective.

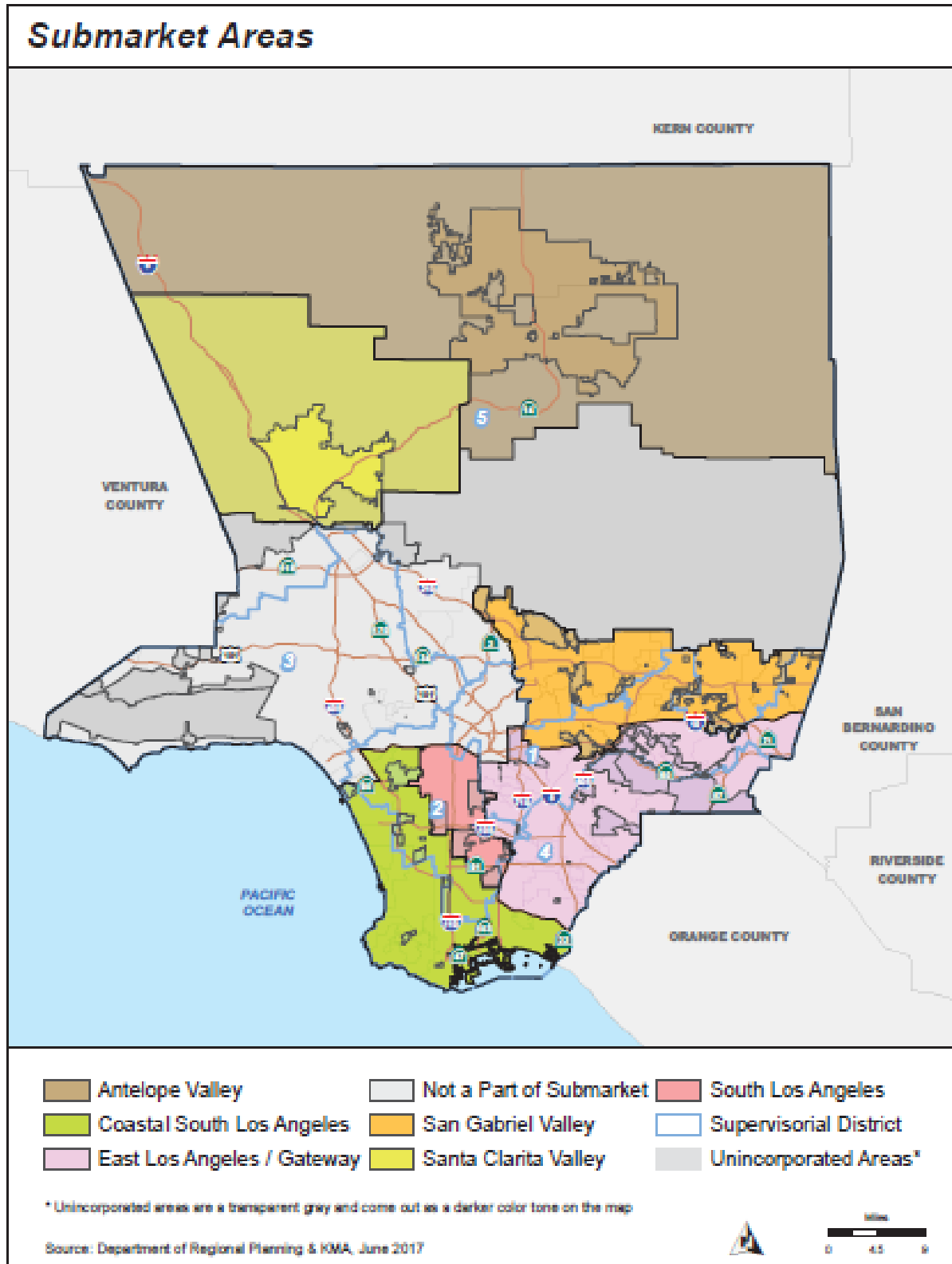
Maximum Fee Calculation

Methodology

The County has expressed interest in implementing a “no net loss” policy whereby any existing rental unit that currently is or recently was affordable to or occupied by a lower-income household would need to be replaced if lost through demolition, conversion, or renovation. This analysis calculates a fee that the County could consider imposing on developers or property owners whose activity results in the loss of an affordable unit. The fee is calculated as the amount of subsidy that would be required to produce a replacement unit through new construction, and reflects the difference between the cost of that construction and the value of the replacement unit as it is subject to income-based rent restrictions.

In January 2018, Keyser Marston Associates (KMA) prepared an “Inclusionary Housing Analysis” for the County, meant to assess the financial capacity of housing development in different parts of the County to incorporate a certain percentage of affordable units within otherwise market-rate housing developments. KMA worked with the County to identify different submarkets that have different profiles, in terms of the types of housing being produced or encouraged under land use policies as well as the market indicators for key economic inputs including land acquisition costs, development costs, and unit values. EPS and County staff agreed that the submarket information used in the KMA study was relevant for this current replacement fee study, and thus served as the basis for key economic inputs. A graphic of the submarket areas used in both the KMA analysis and this current EPS analysis is provided in **Figure 2**.

Figure 2 Submarket Areas for Financial Analysis



Credit: Keyser Marston Associates' "Inclusionary Housing Analysis"; January 25, 2018

Since the KMA study was finalized in early 2018, EPS has updated key economic inputs to reflect market-based trends and escalation over the ensuing years. EPS and County staff then agreed on some adjustments to the specific development assumptions in each submarket, such as the typical densities of projects and the size and distribution of housing units within prototypical projects (e.g., number of 1-bedroom vs. 2-bedroom units, etc.). In each submarket, EPS assumes that a project in which replacement affordable units would be built would qualify for and utilize the maximum State-mandated density bonus of 35 percent above base density. For example, a project with a base density of 40 units per acre in the Coastal South is assumed to be constructed at 54 units per acre after applying the density bonus. This approach reflects the probability that the fees collected would be offered to affordable housing developers whose projects tend to qualify for the maximum density bonus. The primary effect of this assumption is to spread certain costs – such as land acquisition – over more units, thus at least marginally decreasing the cost of development per unit. **Figure 3** shows the types of units assumed in each submarket, including the densities under base and bonus zoning, as well as the mix of bedrooms assumed in each prototypical project.

Figure 3 Assumed Unit Types and Characteristics by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Parking Type	Surface	Structured	Surface	Structured	Structured	Structured
Units/Acre						
<i>Base Density</i>	13.33	40.00	13.33	24.00	40.00	24.00
<i>Bonus Density</i>	18.00	54.00	18.00	32.40	54.00	32.40
Parking/Unit						
<i>Base Density</i>	2.25	2.10	2.10	2.25	2.05	2.10
<i>Bonus Density</i>	2.00	1.63	1.67	2.00	1.63	1.63
Units by Size (Bonus Density)						
<i>Studio</i>	0.0%	18.5%	0.0%	0.0%	0.0%	0.0%
<i>1 Bedroom</i>	0.0%	18.5%	33.3%	0.0%	37.0%	37.0%
<i>2 Bedroom</i>	100.0%	63.0%	48.1%	51.9%	40.7%	63.0%
<i>3 Bedroom</i>	0.0%	0.0%	18.5%	48.1%	22.2%	0.0%

Sources: County staff; EPS

Higher-density buildings tend to have higher construction costs per square foot, and structured parking spaces cost much more than surface parking space. As such, the construction costs per square foot and per unit can vary significantly depending on the type of building. In addition, land values vary significantly by submarket based on market demand and scarcity, with developable land in the more urbanized and high value areas achieving higher prices. **Figure 4** summarizes key cost components resulting in an estimation of the total development costs per unit. These cost assumptions, as well as assumptions regarding market values and affordable housing prices, were vetted not only with County staff but also with consultants from HR&A, who are conducting a related economic study for the County's inclusionary housing policy. Where the HR&A and EPS studies overlap in methodology and data needs, it was agreed that reaching consensus on such assumptions would be valuable. More detail regarding the specific development costs in each submarket is provided in **Appendix A**.

Figure 4 Unit Types and Estimated Development Costs by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Parking Type	Surface	Structured	Surface	Structured	Structured	Structured
Units/Acre	18.00	54.00	18.00	32.40	54.00	32.40
Land Cost/Acre	\$217,800	\$5,009,400	\$653,400	\$2,178,000	\$2,395,800	\$1,960,200
Costs/Unit						
<i>Land</i>	\$12,100	\$92,767	\$36,300	\$67,222	\$44,367	\$60,500
<i>Direct Construction</i>	\$176,110	\$243,019	\$173,340	\$259,137	\$204,698	\$202,072
<i>Indirect Costs</i>	\$64,720	\$89,309	\$63,702	\$95,233	\$75,226	\$74,262
Total Costs/Unit	\$252,930	\$425,095	\$273,342	\$421,592	\$324,291	\$336,834

Sources: County staff; HR&A; EPS

The values of the replacement affordable units are estimated based on the rents that would be charged for households at specified income levels. SB 330 requires replacement of units that were affordable to or recently occupied by low- and very-low income households, which are typically capped at 80 percent and 50 percent of Area Median Income (AMI), respectively. Moreover, for properties for which the income levels of current or recent tenants are not known, the law requires a “rebuttable presumption” that the units in question reflect the general income levels of rental housing in the County more broadly. In the case of Los Angeles County, the “rebuttable presumption” would suggest that roughly two-thirds of the existing units were occupied by low- and very low income households, with very low income households comprising the majority of these renters of affordable units.¹ Based on these factors, EPS and County staff have agreed that replacement affordable units are assumed to be priced at rents affordable to “lower income” households according to the income and rent limits established by the County’s Department of Regional Planning,² which reflect standards for households earning roughly 60 percent of AMI for the County of Los Angeles. The supportable rents for different unit sizes are shown in **Figure 5**, which is based on the rent schedule less a standard utility allowance³ that varies by unit size but not income level or submarket within the county.

¹ The County of Los Angeles “rebuttable presumption” is informed by the data that show 46 percent of renters are “very low income” and 19 percent are “low income.”

² County income and rent limits available here:
http://planning.lacounty.gov/assets/upl/project/housing_2019-income-limits-costs.pdf

³ Utility allowance for heating, cooking, water heating, and other basic electrical available here:
https://wwwb.lacda.org/docs/librariesprovider6/default-document-library/fy-2019-utility-allowance-schedule.pdf?sfvrsn=549b9bbd_0

Figure 5 2019 Income Limits and Maximum Rents by Unit Size

		Number of Bedrooms			
		Studio	1 BR	2 BR	3 BR
Lower Income Limit (Max 80% of AMI)		\$58,450	\$66,800	\$75,150	\$83,500
Lower Income Rent Limit	\$/month	\$768	\$877	\$986	\$1,097
less Utility Costs	\$/month	\$31	\$42	\$51	\$64
Maximum Net Rent	\$/month	\$737	\$835	\$935	\$1,033

Sources: LA County Dept. or Regional Planning; LACDA; EPS

The average value per affordable unit in the prototypical project does vary by submarket, however, because each submarket's project is assumed to have a different mix of unit types and sizes. From the gross rent that can be collected based on income-restricted pricing, operating expenses and vacancies are deducted to calculate the Net Operating Income (NOI). The NOI is then divided by a "capitalization rate" that results in an amount that an investor would be willing to pay today for the rights to collect the NOI from a project for the foreseeable future. In this analysis, EPS assumes that an investor would apply a capitalization rate around 5 percent, meaning that the total unit value is roughly 20 times its annual NOI. There is slight variation among submarkets, however, reflecting actual investor transaction behaviors and based on the perceived risk of rental housing in each area. The capitalization rates are considered reasonable based on current market standards, the relatively low market risk of affordable housing (which essentially will always be in demand), and the limited opportunities for income growth (because affordable rent rates are typically subject to basic inflation rather than greater market fluctuation). **Figure 6** provides the average unit value in each submarket's prototypical project, with more detail available in **Appendix B**.

Figure 6 Average Replacement Unit Values by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Avg. Rent/Mo.	\$935	\$891	\$915	\$979	\$915	\$900
Avg Rent/Yr.	\$11,225	\$10,687	\$10,979	\$11,751	\$10,978	\$10,804
less OpEx/Yr.	-\$4,500	-\$6,000	-\$4,500	-\$6,000	-\$6,000	-\$6,000
<u>less Vacancy Losses</u>	<u>-\$561</u>	<u>-\$534</u>	<u>-\$549</u>	<u>-\$588</u>	<u>-\$549</u>	<u>-\$540</u>
Net Operating Income	\$7,099	\$5,044	\$6,845	\$6,142	\$5,344	\$5,164
Capitalization Rate	5.75%	4.75%	5.75%	4.75%	5.75%	4.75%
Avg. Unit Value	\$123,460	\$106,180	\$119,048	\$129,315	\$92,931	\$108,718

Sources: HR&A; EPS

Results – Maximum Replacement Fees

The difference between the development costs and income-restricted value for a replacement unit represents the subsidy required to produce that unit, and thus the maximum fee that could be charged to an entity that removes and does not replace an affordable unit from the County's existing housing stock. The results vary by location based on product types, unit mix, and development costs. **Figure 7** shows the subsidy required for replacement units, which would be

the maximum fee the County could potentially charge to developers who do not replace the units themselves, if off-site replacement or fees may be allowed. An estimated fee per square foot is also shown, and this would be applied to the square footage of replacement-eligible units lost.

Figure 7 Summary of Maximum Replacement Fees by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Cost per Replacement Unit	\$252,930	\$425,095	\$273,342	\$421,592	\$324,291	\$336,834
<u>Value per Replacement Unit</u>	<u>\$123,460</u>	<u>\$106,180</u>	<u>\$119,048</u>	<u>\$129,315</u>	<u>\$92,931</u>	<u>\$108,718</u>
Subsidy (Fee) per Unit Lost	\$129,470	\$318,914	\$154,294	\$292,277	\$231,360	\$228,116
Avg. SqFt per Unit Lost	900	921	885	1,090	860	844
Avg. Fee/SqFt per Unit Lost	\$144	\$346	\$174	\$268	\$269	\$270

Source: EPS

Feasibility Analysis

The fees calculated and presented above reflect the estimated subsidy required to produce a replacement unit in new construction in each submarket. However, the analysis above does not assess whether charging these maximum fees would represent a manageable cost for a project that displaces an affordable unit, or would likely have the effect of stalling housing developments that might otherwise proceed. In the following analysis, EPS assesses the impact that charging the maximum fee may have on the feasibility of three types of projects:

1. "Substantial Renovation" in which affordable apartments are rehabilitated and rents are increased to market rates.
2. "Condo conversion" in which apartments are rehabilitated and sold as condos; and
3. "Redevelopment" in which existing units are demolished and replaced by a new project.

The analysis also tests the sensitivity of the feasibility results based on factors including:

1. The market values of existing units and future units in different geographies;
2. The assumed costs of rehabilitating units; and
3. The number of units to be replaced relative to the number of future units.

Methodology

When determining the feasibility of a development project on a parcel that already has an existing use on it (as would be the case in all of the replacement scenarios contemplated by the County's policy), an initial question is always "is the value of the existing use greater than the parcel's value as land for redevelopment?" Simply stated, a property owner has the option to either maintain an existing use that generates cash flow, invest additional dollars into the property in hopes of increasing its market value and corresponding cash flow, or demolishing the existing use and developing something of higher value from the ground up. The financially

prudent property owner will choose whichever option yields the greatest revenues relative to the risks involved. For this reason, it is important to understand the value of existing housing that may be subject to the County's replacement requirement.

In **Figure 8**, EPS summarizes the estimated value of existing apartments in each submarket. Similar to the approach to estimating the value of affordable housing units summarized in **Figure 6** and detailed in **Appendix B**, this analysis estimates the rent that an existing unit can achieve (assuming that the units are older and less appealing than newer units, and thus achieve values 33 percent below the market average for recent construction⁴) and the capitalized value of those units based on their income stream. As shown, existing units in the Antelope Valley and South LA are estimated to have the lowest values (under \$125,000 per unit) due to their comparatively low rents, while existing units in the Coastal South and San Gabriel areas have the highest values at over \$250,000 per unit (see **Appendix C** for more detail). For comparison, EPS has also shown the estimated market value of land developable for residential uses in each submarket, as representative of what a developer might pay to acquire a vacant parcel (or one on which previous uses have been demolished) to construct a new building. In each submarket, EPS estimates that the value of existing units – even though they are assumed to be older and worth far less than new units would be – still greatly exceeds the value of the underlying land for a redevelopment project. This conclusion suggests that relatively few existing apartment owners would realize greater value by demolishing their units and offering their sites for new development. Still, it is possible that some properties that are in particularly poor condition and achieve even more modest rents and/or are in areas where premium market rents can be achieved for new units may be subject to displacement pressure.

Figure 8 Estimate of Existing Building and Land Values by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Value of 20 Existing Units						
Number of Units	20	20	20	20	20	20
Market Rent/Unit ¹	\$998	\$1,919	\$1,588	\$1,788	\$969	\$1,423
Net Value/Unit	\$121,473	\$277,963	\$193,216	\$258,989	\$117,886	\$206,192
<i>Total Value</i>	\$2,429,463	\$5,559,269	\$3,864,313	\$5,179,787	\$2,357,720	\$4,123,837
Value of Underlying Land as if Vacant						
Value/Land SF	\$5	\$115	\$15	\$50	\$55	\$45
Land SF	65,340	21,780	65,340	36,300	21,780	36,300
<i>Total Value</i>	\$326,700	\$2,504,700	\$980,100	\$1,815,000	\$1,197,900	\$1,633,500
Maximum Value	\$2,429,463	\$5,559,269	\$3,864,313	\$5,179,787	\$2,357,720	\$4,123,837

1) Market rents for older apartments are assumed to be 33% below rents for new units.

Source: EPS

⁴ According to CoStar data, "Class C" apartments in Los Angeles County are currently averaging rents of \$2.12 per square foot while "Class A" apartments are averaging \$3.24 per square foot.

Substantial Renovation of Apartments

The value of the existing units is similarly important to understanding whether a developer would be financially motivated to take various actions that lead to the displacement of vulnerable residents. One such action would be to invest in the substantial renovation of the units so that rents can be increased. In this case, EPS has assumed that the costs to renovate the units would be roughly 40 percent of the costs of building the units from the ground up in each submarket (excluding land costs). Expenditures at this level could include cosmetic investments such as new appliances, fixtures, and countertops in kitchens and bathrooms, new flooring and fresh paint throughout the units, exterior improvements, and upgrades to shared spaces inside and outside the buildings, as well as some upgrades to systems such as plumbing, electrical, and HVAC.

As shown in **Figure 9** and in more detail in **Appendix D**, EPS estimates that substantial rental renovation would be feasible only in the higher value submarkets, even *without* accounting for any costs associated with replacement of existing affordable units. Even in these higher value submarkets, however, the surplus value from the renovation is a mere fraction (around 20 percent) of the maximum fees calculated above that could be charged to developers who cause displacement of lower-income tenants. That is to say, if all of the units in the existing structure were subject to the replacement requirement, typical apartment owners would not be motivated to substantially renovate their units so that they could significantly increase their rents. However, if only about one in five existing units in their buildings would qualify for replacement, or if the County collected fees only in that rough proportion, there may still be a financial incentive for the property owner to invest in a substantial renovation. These dynamics are intended to reflect a fairly typical renovation opportunity, but the results may be different for projects that a) involve existing properties achieving still lower rents than are assumed here, b) could potentially achieve still greater market rents following renovation, and/or c) can be renovated much more cost-effectively than is assumed here. To the extent that a project's economics might be improved in one or more of those ways, it is possible that a developer/owner could afford to pay a greater replacement fee and/or replace more lost units than these results suggest.

Figure 9 Feasibility of Rental Renovation and Replacement Fees by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Value of 20 Existing Units	\$2,429,463	\$5,559,269	\$3,864,313	\$5,179,787	\$2,357,720	\$4,123,837
Value from Rental Renovation BEFORE Replacement Requirement						
Value of 20 Renovated Units	\$3,941,374	\$9,170,829	\$6,269,165	\$8,544,818	\$3,824,984	\$6,802,873
<u>less Renovation Costs</u>	<u>\$2,037,222</u>	<u>\$2,480,329</u>	<u>\$2,006,862</u>	<u>\$2,509,797</u>	<u>\$1,957,567</u>	<u>\$1,969,853</u>
Net Proceeds from Renovation	\$1,904,152	\$6,690,501	\$4,262,303	\$6,035,021	\$1,867,417	\$4,833,020
Surplus Value from Renovation vs. Existing Units	\$0	\$1,131,231	\$397,990	\$855,234	\$0	\$709,184
Cost (Fee) per Unit to be Replaced	\$129,470	\$318,914	\$154,294	\$292,277	\$231,360	\$228,116
# of Existing 20 Units that could Feasibly be Replaced	0.0	3.5	2.6	2.9	0.0	3.1
% of Units that could Feasibly be Replaced	0%	18%	13%	15%	0%	16%

Source: EPS

Conversion to Condominiums

As with the substantial renovation of apartments, it may be possible to convert existing apartments to condominiums and sell them for more than the existing apartments are worth. Again, the basic feasibility of such a project depends on the achievable prices for those condominiums and the costs of making them marketable as condominiums.

The achievable values for condominiums are based on the typical prices per square foot in each submarket multiplied by the assumed sizes of the units, that also vary by submarket. KMA's previous study found that condominium values were highest in the San Gabriel and Coastal South areas, and data on 2019 sales from Zillow.com confirm this to remain true. EPS has updated the condominium values based on recent transactions in each submarket, and also applied a 25 percent premium to the current average condominium prices to reflect the fact that the converted and renovated units would be assumed to be improved and more valuable relative to the market average unit, which includes significantly older and unimproved units.

After netting out the estimated costs of renovating the units for conversion to condominiums – again assumed to be roughly 40 percent of the cost of constructing new condominium units – **Figure 10** indicates what the property owner could reap from a condominium conversion in the various submarkets. However, these proceeds must again be weighed against the value of the existing properties in their current state as rental units. In this case, rents for even older apartments in the Coastal South are so strong that the net proceeds from condominium conversion relative to the existing units' value leaves relatively little surplus revenue available to fund the replacement requirement. In San Gabriel, however, recent market data suggests that the large converted units are worth much more for-sale than the existing units are worth as rentals, producing a much greater incentive for condominium conversion and a much greater capacity to fund unit replacement. **Figure 10** indicates that a typical condominium conversion would not be able to pay the full maximum replacement fee or replace all 20 existing units in any submarket, but that in general such projects could afford to replace more naturally occurring affordable units or pay higher replacement fees than under the rental renovation scenario presented above. More detailed calculations of the condominium conversion feasibility are provided in **Appendix E**.

Figure 10 Feasibility of Condo Conversion and Replacement Fees by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Value of 20 Existing Units	\$2,429,463	\$5,559,269	\$3,864,313	\$5,179,787	\$2,357,720	\$4,123,837
Value from Condo Conversion BEFORE Replacement Requirement						
Value of Converted Units	\$3,801,600	\$9,197,760	\$6,626,880	\$12,138,240	\$7,265,280	\$7,938,000
<u>less Renovation/Conversion Costs</u>	<u>\$2,113,122</u>	<u>\$2,558,021</u>	<u>\$2,081,497</u>	<u>\$2,601,720</u>	<u>\$2,030,094</u>	<u>\$2,041,009</u>
Net Proceeds from Conversion	\$1,688,478	\$6,639,739	\$4,545,383	\$9,536,520	\$5,235,186	\$5,896,991
Surplus Value from Conversion vs. Existing Units	\$0	\$1,080,470	\$681,070	\$4,356,733	\$2,877,466	\$1,773,155
Cost (Fee) per Unit to be Replaced	\$129,470	\$318,914	\$154,294	\$292,277	\$231,360	\$228,116
# of Existing 20 Units that could Feasibly be Replaced	0.0	3.4	4.4	14.9	12.4	7.8
% of Units that could Feasibly be Replaced	0%	17%	22%	75%	62%	39%

Source: EPS

Redevelopment Projects

A third option for the owners of aging low-cost apartment buildings is to demolish their existing units and replace them with newly constructed units that can achieve higher values. In order to justify the investment in this case, the value of the new units must be sufficiently greater than the cost of demolition and new construction, and also greater than the value of the existing units' income stream. If replacement costs are incurred, those would factor into the value of the new units (if units are replaced on site) or into the costs of the development (if a fee is paid in lieu of units).

The feasibility of the redevelopment option of course depends on the market values of new units and their development costs, but also depends on the number of new units being created. In the two preceding scenarios – rental renovation and condominium conversion – the existing building remains in place and the number of units remains the same. In a redevelopment scenario, it may be possible to increase the size of the new project relative to the existing units. For example, the prototypical project in each submarket is assumed to have 20 units throughout this analysis. However, a redevelopment project is likely to be required to provide inclusionary housing units, and may therefore qualify for the State's mandated density bonus. In this analysis, EPS has assumed that future multifamily buildings on redeveloped sites would qualify for the full 35 percent density bonus and thus would have 27 units instead of 20. Of these, four units are assumed to be income-restricted affordable units, and 23 would be offered at market rate.

Redevelopment for Rental Apartments

In the scenario in which existing rental units would be demolished and replaced by new rental units, EPS assumes that the new rental project would be subject to an inclusionary ordinance and would choose to provide 20 percent of the base density units (four of the 20) at prices affordable at 60 percent of Area Median Income in order to qualify for the maximum density bonus. The affordable rents for different unit sizes were shown in **Figure 5** above, and apply equally throughout the County.

Figure 11 summarizes the results of this redevelopment scenario if the new units were offered as rental apartments rather than for-sale condominiums. This analysis suggests that new apartment construction is not feasible in the Antelope Valley and South LA submarkets, because the market rents achievable in those areas cannot support the costs of new construction. In the other four submarkets, market-rate rents are stronger and can support the cost of construction. However, the net proceeds per new unit are not great enough to make it worth demolishing existing units with steady income streams, despite their comparatively low rents, unless the number of new units greatly exceeds the number of units being replaced. For this reason, EPS concludes that it is unlikely that many lower-cost apartments would be demolished and replaced with only a marginally higher number of new apartment units (say, 27 versus 20, as assumed in this analysis).

Figure 11 Feasibility of Redevelopment for New Apartment Units by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Value of 20 Existing Units	\$2,429,463	\$5,559,269	\$3,864,313	\$5,179,787	\$2,357,720	\$4,123,837
Value from Redevelopment BEFORE Replacement Requirement						
Total Value of 27 New Units	\$5,054,428	\$11,016,523	\$7,771,225	\$10,527,946	\$4,938,198	\$8,422,690
<u>less Redevelopment Costs (excluding Land Acquisition)¹</u>	<u>\$6,719,033</u>	<u>\$9,194,584</u>	<u>\$6,613,134</u>	<u>\$9,830,332</u>	<u>\$7,764,939</u>	<u>\$7,664,091</u>
Net Proceeds from Redevelopment	-\$1,664,605	\$1,821,939	\$1,158,091	\$697,613	-\$2,826,741	\$758,599
Net Proceeds from Redevelopment per New Unit	\$0	\$67,479	\$42,892	\$25,838	\$0	\$28,096
Redevelopment Units Required to Exceed Existing Value	N/A	82	90	200	N/A	147
Ratio of Required Redevelopment Units to Existing Units	N/A	4.1	4.5	10.0	N/A	7.3

1) Redevelopment Costs include direct (labor and materials) and indirect costs for the new construction, but exclude the cost of land acquisition because it is assumed that the developer already owns the property being redeveloped. If acquisition costs were included - either as the market value of land in the given submarket or as the value of the existing 20 units - the redevelopment costs would be greater and the feasibility of redeveloping the property would be that much more challenging. For example, in East LA, acquiring land at market rate prices of \$45 per land square foot for 0.83 acres would add \$1.63 million to redevelopment costs and render the redevelopment project infeasible if only 27 new units were being constructed.
Source: EPS

EPS therefore estimates the number of new units that *would* yield sufficient net proceeds (values less development costs) to exceed the value of the existing units in each submarket.⁵ In Antelope Valley and South LA, this analysis indicates that the costs of development exceed the values of what would be constructed, and thus no amount of new units would be more financially profitable than retaining the existing units. In the other four submarkets with higher housing values that do exceed the development costs, this analysis suggests that feasibility is best achieved if the number of new units exceeds the number of existing units by ratios of 4:1 or even 10:1. Such densities typically surpass what is achievable on a given site, even with State and County density bonus incentives, and thus are not likely for most properties. However, the projects would need to exceed those densities further still to yield sufficient revenues to replace existing affordable units or pay a replacement fee. More detailed calculations are provided in **Appendix F**.

Redevelopment for Condominiums

Using a similar approach as above, EPS has estimated the feasibility of redeveloping existing affordable apartment properties to build new condominiums rather than apartments. In this case, however, EPS assumes that new condominium development would be subject to an inclusionary ordinance requiring from 0 to 20 percent of the new condominium units (varying by submarket) at prices affordable at 130 percent of Area Median Income, consistent with the County's draft Inclusionary Housing Ordinance. **Figure 12** shows the estimates of the affordable sale prices for condominium units, which apply to all submarkets throughout the County.

⁵ For this analysis, EPS used a simple per-unit average of the "net proceeds from redevelopment" for the 27-unit redevelopment scenario, and divided that figure by the existing units' value to estimate how many new units would be required to surpass the value of the existing units. In practice, this calculation would be more complex, as higher density projects may have different development costs and achievable values, and thus not reflect a linear relationship between the number of units and their "net proceeds from redevelopment" per unit.

Figure 12 Estimated Prices of Affordable Condominiums

Description	Factor	Description	Number of Bedrooms			
			Studio	1 BR	2 BR	3 BR
Household Income @ 130% of AMI			\$66,495	\$76,050	\$85,540	\$95,030
Income Available for Housing Costs	35%	% income	\$23,273	\$26,618	\$29,939	\$33,261
- Non-Mortgage Housing Costs	7%	% income	-\$4,655	-\$5,324	-\$5,988	-\$6,652
Income Available for Mortgage			\$18,619	\$21,294	\$23,951	\$26,608
Mortgage Interest Rate			4.00%	4.00%	4.00%	4.00%
Mortgage Term (years)			30	30	30	30
Mortgage Total			\$321,953	\$368,217	\$414,165	\$460,113
Downpayment			10.00%	10.00%	10.00%	10.00%
Value			\$358,000	\$409,000	\$460,000	\$511,000

Source: LA County Dept. of Regional Planning; Economic & Planning Systems

Figure 13 summarizes the results of the for-sale redevelopment scenario, and indicates that the construction of new condominiums may be more feasible than the construction of apartments in some markets because for-sale housing achieves significantly greater value than rental units in those areas. New condominium construction still appears infeasible in the Antelope Valley, however. In each submarket, the net proceeds from developing 27 new condominium units (i.e., values of those units less the costs of construction) again falls short of the value of the 20 existing older affordable units' income streams, but the number of condominiums required to reach feasibility appears to be lower than the number of apartments under the previous scenario. EPS estimates that as few as 28 new condominiums may be required to achieve redevelopment proceeds that exceed the value of 20 existing affordable units in San Gabriel, but as many as 78 new condos may be required to generate the value of the 20 existing affordable apartments in the Santa Clarita submarket. Again, these results are driven by the assumed size and market value of the new condominiums relative to the value of older apartments in each area, and reflect project economics without any requirement for replacing the existing lower income units. To the extent that replacement of some or all of the existing units may be required under County or State law (which would require them to be replaced as low or very low income rentals rather than middle-income ownership units), the number of new condominium units required for feasibility will be higher still, and thus that much less likely. More detailed calculations are provided in **Appendix G**.

Figure 13 Feasibility of Redevelopment for New Condominiums by Submarket

	Antelope Valley	Coastal South	Santa Clarita	San Gabriel	South LA	East LA
Value of 20 Existing Units	\$2,429,463	\$5,559,269	\$3,864,313	\$5,179,787	\$2,357,720	\$4,123,837
Value from Redevelopment BEFORE Replacement Requirement						
Total Value of 27 New Units	\$5,132,160	\$12,199,248	\$8,946,288	\$15,799,176	\$9,808,128	\$10,716,300
<u>less Redevelopment Costs (excluding Land Acquisition)</u>	<u>\$7,716,183</u>	<u>\$9,943,389</u>	<u>\$7,604,917</u>	<u>\$10,767,635</u>	<u>\$8,451,759</u>	<u>\$8,452,207</u>
Net Proceeds from Redevelopment	-\$2,584,023	\$2,255,859	\$1,341,371	\$5,031,541	\$1,356,369	\$2,264,093
Net Proceeds from Redevelopment per New Unit	\$0	\$83,550	\$49,680	\$186,353	\$50,236	\$83,855
Redevelopment Units Required to Exceed Existing Value	N/A	67	78	28	47	49
Ratio of Required Redevelopment Units to Existing Units	N/A	3.3	3.9	1.4	2.3	2.5

Source: EPS

Feasibility Conclusions

Under each of the three scenarios – substantial renovation of existing apartments, conversion to condominiums, and redevelopment for construction of a greater number of new units – the feasibility analysis indicates that most projects are likely to face significant challenges to generating financial returns that exceed the value of the existing units. This would be the case even without any unit replacement or inclusionary housing requirements, because the value of even older, lower-rent units exceeds the net proceeds that could be generated from the upgrade. From a policy perspective this suggests that relatively few income-restricted or older “naturally occurring affordable housing” properties are likely to be lost to market pressures to substantially reinvest in the properties and raise their value and prices. Setting an even more restrictive standard – such as requiring that “extremely low income” units be accounted for and mitigated rather than just low- and very low income units – would make it that much less likely that projects would proceed that would displace vulnerable households or result in a net loss of affordable units.

However, for properties in which only a portion of the existing units may qualify for replacement and/or mitigation, or where the existing density can be significantly increased through redevelopment, the property owners may have financial incentive to pursue a path that yields greater value. For example, developers or the County may exercise the “rebuttable presumption” for properties for which tenant income levels are unknown, and this scenario would require developers to replace or mitigate the loss of only 65 percent of the units in a given project. This analysis suggests that few projects could feasibly proceed even under this less onerous standard (compared to assuming *all* existing units were subject to replacement) because there is limited market incentive to incur the costs of significantly upgrading properties. In the seemingly rare cases that will proceed, the County may choose to require mitigation that fully covers the subsidy required to provide a unit at an affordable price point, whether that be through on-site provision of a unit or collection of a replacement fee that can subsidize the construction of a replacement unit elsewhere.

In short, this study finds that virtually no existing property comprised entirely of replacement-eligible units is likely to be lost to improvement, conversion, or redevelopment because the cost of replacing those lost units is too great. However, it may be possible that owners or developers may be able to afford replacement requirements for properties in which only a fraction of the existing units must be replaced. In either case, the County Supervisors’ goal of “no net loss” of income-restricted or naturally occurring affordable units can be fulfilled.

APPENDIX A

REPLACEMENT UNIT DEVELOPMENT COST ESTIMATES BY SUBMARKET



Table A-1 Estimated Development Costs for Replacement Units – Antelope Valley

Submarket: **Antelope Valley**

Description	Factor Description	Amount	Per Unit
ASSUMPTIONS			
<i>Program</i>			
Land Area (Sq. Ft.)		65,340	
Gross Building Area (Sq. Ft.)		31,050	
Units		27	
<i>Parking Spaces</i>			
Surface		54	
Structured		0	
<i>Metrics</i>			
Dwelling Units/Acre		18.00	
COST ESTIMATE			
Land Acquisition		\$326,700	\$12,100
Direct			
Site Improvement	\$5.00 \$/land sf	\$326,700	\$12,100
Vertical	\$120.00 \$/gba	\$3,726,000	\$138,000
Surface Parking	\$5,000 \$/space	\$270,000	\$10,000
Structured Parking	\$23,375 \$/space	\$0	\$0
Contractor Contingency	10.00% % of other direct costs	\$432,270	\$16,010
Subtotal		\$4,754,970	\$176,110
Indirect	36.75% % direct costs	\$1,747,451	\$64,720
Total		\$6,829,121	\$252,930

Sources: County staff; Economic & Planning Systems

Table A-2 Estimated Development Costs for Replacement Units – Coastal South Submarket:

Coastal South

Description	Factor Description	Amount	Per Unit
ASSUMPTIONS			
<i>Program</i>			
Land Area (Sq. Ft.)		21,780	
Gross Building Area (Sq. Ft.)		31,146	
Units		27	
<i>Parking Spaces</i>			
Surface		0	
Structured		44	
<i>Metrics</i>			
Dwelling Units/Acre		54.00	
COST ESTIMATE			
Land Acquisition	\$115.00 \$/land sf	\$2,504,700	\$92,767
Direct			
Site Improvement	\$5.00 \$/land sf	\$108,900	\$4,033
Vertical	\$155.00 \$/gba	\$4,827,604	\$178,800
Surface Parking	\$5,000 \$/space	\$0	\$0
Structured Parking	\$23,375 \$/space	\$1,028,500	\$38,093
Contractor Contingency	10.00% % of other direct costs	\$596,500	\$22,093
Subtotal		\$6,561,505	\$243,019
Indirect	36.75% % direct costs	\$2,411,353	\$89,309
Total		\$11,477,558	\$425,095

Sources: County staff; Economic & Planning Systems

Table A-3 Estimated Development Costs for Replacement Units – Santa Clarita

Submarket:

Santa Clarita

Description	Factor Description	Amount	Per Unit
ASSUMPTIONS			
<i>Program</i>			
Land Area (Sq. Ft.)		65,340	
Gross Building Area (Sq. Ft.)		30,858	
Units		27	
<i>Parking Spaces</i>			
Surface		45	
Structured		0	
<i>Metrics</i>			
Dwelling Units/Acre		18.00	
COST ESTIMATE			
Land Acquisition		\$980,100	\$36,300
Direct			
Site Improvement	\$15.00 \$/land sf	\$326,700	\$12,100
Vertical	\$5.00 \$/land sf	\$3,703,000	\$137,148
Surface Parking	\$120.00 \$/gba	\$225,000	\$8,333
Structured Parking	\$5,000 \$/space	\$0	\$0
Contractor Contingency	\$23,375 \$/space	\$425,470	\$15,758
Subtotal	10.00% % of other direct costs	\$4,680,170	\$173,340
Indirect		\$1,719,962	\$63,702
Total	36.75% % direct costs	\$7,380,232	\$273,342

Sources: County staff; Economic & Planning Systems

Table A-4 Estimated Development Costs for Replacement Units – San Gabriel

Submarket:

San Gabriel

Description	Factor Description	Amount	Per Unit
ASSUMPTIONS			
<i>Program</i>			
Land Area (Sq. Ft.)		36,300	
Gross Building Area (Sq. Ft.)		37,822	
Units		27	
<i>Parking Spaces</i>			
Surface		0	
Structured		54	
<i>Metrics</i>			
Dwelling Units/Acre		32.40	
COST ESTIMATE			
Land Acquisition			
Direct			
Site Improvement	\$50.00	\$/land sf	
			\$1,815,000
			\$67,222
Site Improvement	\$5.00	\$/land sf	
Vertical	\$130.00	\$/gba	
Surface Parking	\$5,000	\$/space	
Structured Parking	\$23,375	\$/space	
Contractor Contingency	10.00%	% of other direct costs	
Subtotal			
			\$6,996,703
			\$259,137
Indirect	36.75%	% direct costs	
			\$2,571,288
Total			
			\$11,382,991
			\$421,592

Sources: County staff; Economic & Planning Systems

Table A-5 Estimated Development Costs for Replacement Units – South LA

Submarket:

South LA

Description	Factor Description	Amount	Per Unit
ASSUMPTIONS			
<i>Program</i>			
Land Area (Sq. Ft.)		21,780	
Gross Building Area (Sq. Ft.)		29,900	
Units		27	
<i>Parking Spaces</i>			
Surface		0	
Structured		44	
<i>Metrics</i>			
Dwelling Units/Acre		54.00	
COST ESTIMATE			
Land Acquisition			
Direct			
Site Improvement	\$55.00	\$/land sf	\$1,197,900
Vertical	\$5.00	\$/land sf	\$108,900
Surface Parking	\$130.00	\$/gba	\$3,887,000
Structured Parking	\$5,000	\$/space	\$0
Contractor Contingency	\$23,375	\$/space	\$1,028,500
	10.00%	% of other direct costs	\$502,440
Subtotal			\$5,526,840
Indirect	36.75%	% direct costs	\$2,031,114
Total			\$8,755,854

Sources: County staff; Economic & Planning Systems

Table A-6 Estimated Development Costs for Replacement Units – East LA

Submarket:

East LA

Description	Factor Description	Amount	Per Unit
ASSUMPTIONS			
<i>Program</i>			
Land Area (Sq. Ft.)		36,300	
Gross Building Area (Sq. Ft.)		28,846	
Units		27	
<i>Parking Spaces</i>			
Surface		0	
Structured		44	
<i>Metrics</i>			
Dwelling Units/Acre		32.40	
COST ESTIMATE			
Land Acquisition			
Direct			
Site Improvement	\$45.00	\$/land sf	\$1,633,500
Vertical	\$5.00	\$/land sf	\$181,500
Surface Parking	\$130.00	\$/gba	\$3,749,958
Structured Parking	\$5,000	\$/space	\$0
Contractor Contingency	\$23,375	\$/space	\$1,028,500
	10.00%	% of other direct costs	\$495,996
Subtotal			\$5,455,954
Indirect	36.75%	% direct costs	\$2,005,063
Total			\$9,094,517

Sources: County staff; Economic & Planning Systems

APPENDIX B

REPLACEMENT UNIT VALUE AND SUBSIDY ESTIMATES BY SUBMARKET



Table B-1 Estimated Replacement Unit Value and Subsidies – Antelope Valley

Submarket:

Antelope Valley

Description	Factor	Description	Amount	%
ASSUMPTIONS				
<i>Unit Mix</i>				
Studio			0	0%
1 BR			0	0%
2 BR			20	100%
3 BR			0	0%
Total			20	100%
<i>Max Rent for Lower Income</i>				
Studio			\$737	
1 BR			\$835	
2 BR			\$935	
3 BR			\$1,033	
VALUE PER UNIT				
Weighted Avg. Rent/Month			\$935	
Annual Rent			\$11,225	
- Operating Expenses	\$4,500	\$/unit	-\$4,500	
- Vacancy	5.00%	% gross revenue	-\$561	
Net Operating Income			\$7,099	
Value	5.75%	cap rate on NOI	\$123,460	
GAP PER UNIT				
Value Per Unit			\$123,460	
- Cost Per Unit			-\$252,930	
Gap Per Unit			-\$129,470	

Sources: County staff; Economic & Planning Systems

Table B-2 Estimated Replacement Unit Value and Subsidies – Coastal South

Submarket:

Coastal South

Description	Factor	Description	Amount	%
ASSUMPTIONS				
<i>Unit Mix</i>				
Studio			3	15%
1 BR			3	15%
2 BR			14	70%
3 BR			0	0%
Total			20	100%
<i>Max Rent for Lower Income</i>				
Studio			\$737	
1 BR			\$835	
2 BR			\$935	
3 BR			\$1,033	
VALUE PER UNIT				
Weighted Avg. Rent/Month			\$891	
Annual Rent			\$10,687	
- Operating Expenses	\$6,000	\$/unit	-\$6,000	
- Vacancy	5.00%	% gross revenue	-\$534	
Net Operating Income			\$5,044	
Value	4.75%	cap rate on NOI	\$106,180	
GAP PER UNIT				
Value Per Unit			\$106,180	
- Cost Per Unit			-\$425,095	
Gap Per Unit			-\$318,914	

Sources: County staff; Economic & Planning Systems

Table B-3 Estimated Replacement Unit Value and Subsidies – Santa Clarita

Submarket:

Santa Clarita

Description	Factor	Description	Amount	%
ASSUMPTIONS				
<i>Unit Mix</i>				
Studio			0	0%
1 BR			7	35%
2 BR			10	50%
3 BR			3	15%
Total			20	100%
<i>Max Rent for Lower Income</i>				
Studio			\$737	
1 BR			\$835	
2 BR			\$935	
3 BR			\$1,033	
VALUE PER UNIT				
Weighted Avg. Rent/Month			\$915	
Annual Rent			\$10,979	
- Operating Expenses	\$4,500	\$/unit	-\$4,500	
- Vacancy	5.00%	% gross revenue	-\$549	
Net Operating Income			\$6,845	
Value	5.75%	cap rate on NOI	\$119,048	
GAP PER UNIT				
Value Per Unit			\$119,048	
- Cost Per Unit			-\$273,342	
Gap Per Unit			-\$154,294	

Sources: County staff; Economic & Planning Systems

Table B-4 Estimated Replacement Unit Value and Subsidies – San Gabriel

Submarket:

San Gabriel

Description	Factor	Description	Amount	%
ASSUMPTIONS				
<i>Unit Mix</i>				
Studio			0	0%
1 BR			0	0%
2 BR			11	55%
3 BR			9	45%
Total			20	100%
<i>Max Rent for Lower Income</i>				
Studio			\$737	
1 BR			\$835	
2 BR			\$935	
3 BR			\$1,033	
VALUE PER UNIT				
Weighted Avg. Rent/Month			\$979	
Annual Rent			\$11,751	
- Operating Expenses	\$6,000	\$/unit	-\$6,000	
- Vacancy	5.00%	% gross revenue	-\$588	
Net Operating Income			\$6,142	
Value	4.75%	cap rate on NOI	\$129,315	
GAP PER UNIT				
Value Per Unit			\$129,315	
- Cost Per Unit			-\$421,592	
Gap Per Unit			-\$292,277	

Sources: County staff; Economic & Planning Systems

Table B-5 Estimated Replacement Unit Value and Subsidies – South LA

Submarket:

South LA

Description	Factor	Description	Amount	%
ASSUMPTIONS				
<i>Unit Mix</i>				
Studio			0	0%
1 BR			8	40%
2 BR			8	40%
3 BR			4	20%
Total			20	100%
<i>Max Rent for Lower Income</i>				
Studio			\$737	
1 BR			\$835	
2 BR			\$935	
3 BR			\$1,033	
VALUE PER UNIT				
Weighted Avg. Rent/Month			\$915	
Annual Rent			\$10,978	
- Operating Expenses	\$6,000	\$/unit	-\$6,000	
- Vacancy	5.00%	% gross revenue	-\$549	
Net Operating Income			\$5,344	
Value	5.75%	cap rate on NOI	\$92,931	
GAP PER UNIT				
Value Per Unit			\$92,931	
- Cost Per Unit			-\$324,291	
Gap Per Unit			-\$231,360	

Sources: County staff; Economic & Planning Systems

Table B-6 Estimated Replacement Unit Value and Subsidies – East LA

Submarket:

East LA

Description	Factor	Description	Amount	%
ASSUMPTIONS				
<i>Unit Mix</i>				
Studio			0	0%
1 BR			7	35%
2 BR			13	65%
3 BR			0	0%
Total			20	100%
<i>Max Rent for Lower Income</i>				
Studio			\$737	
1 BR			\$835	
2 BR			\$935	
3 BR			\$1,033	
VALUE PER UNIT				
Weighted Avg. Rent/Month			\$900	
Annual Rent			\$10,804	
- Operating Expenses	\$6,000	\$/unit	-\$6,000	
- Vacancy	5.00%	% gross revenue	-\$540	
Net Operating Income			\$5,164	
Value	4.75%	cap rate on NOI	\$108,718	
GAP PER UNIT				
Value Per Unit			\$108,718	
- Cost Per Unit			-\$336,834	
Gap Per Unit			-\$228,116	

Sources: County staff; Economic & Planning Systems

APPENDIX C

ESTIMATED VALUE OF EXISTING RENTAL HOUSING BY SUBMARKET



Table C-1 Estimated Existing Rental Unit Values – Antelope Valley

Submarket:		Antelope Valley	
Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area		65,340	
<i>Base Prototype</i>			
Studio		0	0%
1 BR		0	0%
2 BR		20	100%
3 BR		0	0%
Total		20	100%
VALUE OF EXISTING UNITS		Total	per Unit
<i>Net Operating Income</i>			
Mkt Rate Revenue	\$998	\$/unit/month	
		\$239,592	\$11,980
Gross Revenue		\$239,592	\$11,980
- Operating Expense	30.00%	% gross revenues	
		-\$71,878	-\$3,594
- Vacancy	5.00%	% gross revenues	
		-\$11,980	-\$599
Subtotal - NOI		\$155,735	\$7,787
<i>Sales Revenue</i>			
Capitalized Value	6.25%	noi/value	
		\$2,491,757	\$124,588
Cost of Sale	2.50%	% capitalized value	
		-\$62,294	-\$3,115
Total		\$2,429,463	\$121,473
VALUE OF UNDERLYING LAND		Total	per Unit
Land Acquisition	\$5.00	\$/land sf	
		\$326,700	\$16,335
COST TO ACQUIRE (Greater of Existing Units or Land Value)		\$2,429,463	\$121,473

Sources: County staff; Economic & Planning Systems

Table C-2 Estimated Existing Rental Unit Values – Coastal South

Submarket:		Coastal South	
Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area		21,780	
<i>Base Prototype</i>			
Studio		3	15%
1 BR		3	15%
2 BR		14	70%
3 BR		0	0%
Total		20	100%
VALUE OF EXISTING UNITS		Total	per Unit
<i>Net Operating Income</i>			
Mkt Rate Revenue	\$1,919	\$/unit/month	
		\$460,531	\$23,027
Gross Revenue		\$460,531	\$23,027
- Operating Expense	30.00%	% gross revenues	
		-\$138,159	-\$6,908
- Vacancy	5.00%	% gross revenues	
		-\$23,027	-\$1,151
Subtotal - NOI		\$299,345	\$14,967
<i>Sales Revenue</i>			
Capitalized Value	5.25%	noi/value	
		\$5,701,815	\$285,091
Cost of Sale	2.50%	% capitalized value	
		-\$142,545	-\$7,127
Total		\$5,559,269	\$277,963
VALUE OF UNDERLYING LAND		Total	per Unit
Land Acquisition	\$115.00	\$/land sf	
		\$2,504,700	\$125,235
COST TO ACQUIRE (Greater of Existing Units or Land Value)		\$5,559,269	\$277,963

Sources: County staff; Economic & Planning Systems

Table C-3 Estimated Existing Rental Unit Values – Santa Clarita

Submarket:		Santa Clarita	
Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area		65,340	
<i>Base Prototype</i>			
Studio		0	0%
1 BR		7	35%
2 BR		10	50%
3 BR		3	15%
Total		20	100%
VALUE OF EXISTING UNITS		Total	per Unit
<i>Net Operating Income</i>			
Mkt Rate Revenue	\$1,588 \$/unit/month	\$381,096	\$19,055
Gross Revenue		\$381,096	\$19,055
- Operating Expense	30.00% % gross revenues	-\$114,329	-\$5,716
- Vacancy	5.00% % gross revenues	-\$19,055	-\$953
Subtotal - NOI		\$247,712	\$12,386
<i>Sales Revenue</i>			
Capitalized Value	6.25% noi/value	\$3,963,398	\$198,170
Cost of Sale	2.50% % capitalized value	-\$99,085	-\$4,954
Total		\$3,864,313	\$193,216
VALUE OF UNDERLYING LAND		Total	per Unit
Land Acquisition	\$15.00 \$/land sf	\$980,100	\$49,005
COST TO ACQUIRE (Greater of Existing Units or Land Value)		\$3,864,313	\$193,216

Sources: County staff; Economic & Planning Systems

Table C-4 Estimated Existing Rental Unit Values – San Gabriel

Submarket:

San Gabriel

Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area		36,300	
<i>Base Prototype</i>			
Studio		0	0%
1 BR		0	0%
2 BR		11	55%
3 BR		9	45%
Total		20	100%
VALUE OF EXISTING UNITS		Total	per Unit
<i>Net Operating Income</i>			
Mkt Rate Revenue	\$1,788 \$/unit/month	\$429,095	\$21,455
Gross Revenue		\$429,095	\$21,455
- Operating Expense	30.00% % gross revenues	-\$128,728	-\$6,436
- Vacancy	5.00% % gross revenues	-\$21,455	-\$1,073
Subtotal - NOI		\$278,912	\$13,946
<i>Sales Revenue</i>			
Capitalized Value	5.25% noi/value	\$5,312,602	\$265,630
Cost of Sale	2.50% % capitalized value	-\$132,815	-\$6,641
Total		\$5,179,787	\$258,989
VALUE OF UNDERLYING LAND		Total	per Unit
Land Acquisition	\$50.00 \$/land sf	\$1,815,000	\$90,750
COST TO ACQUIRE (Greater of Existing Units or Land Value)		\$5,179,787	\$258,989

Sources: County staff; Economic & Planning Systems

Table C-5 Estimated Existing Rental Unit Values – South LA

Submarket:		South LA	
Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area		21,780	
<i>Base Prototype</i>			
Studio		0	0%
1 BR		8	40%
2 BR		8	40%
3 BR		4	20%
Total		20	100%
VALUE OF EXISTING UNITS		Total	per Unit
<i>Net Operating Income</i>			
Mkt Rate Revenue	\$969 \$/unit/month	\$232,517	\$11,626
Gross Revenue		\$232,517	\$11,626
- Operating Expense	30.00% % gross revenues	-\$69,755	-\$3,488
- Vacancy	5.00% % gross revenues	-\$11,626	-\$581
Subtotal - NOI		\$151,136	\$7,557
<i>Sales Revenue</i>			
Capitalized Value	6.25% noi/value	\$2,418,175	\$120,909
Cost of Sale	2.50% % capitalized value	-\$60,454	-\$3,023
Total		\$2,357,720	\$117,886
VALUE OF UNDERLYING LAND		Total	per Unit
Land Acquisition	\$55.00 \$/land sf	\$1,197,900	\$59,895
COST TO ACQUIRE (Greater of Existing Units or Land Value)		\$2,357,720	\$117,886

Sources: County staff; Economic & Planning Systems

Table C-6 Estimated Existing Rental Unit Values – East LA

Submarket:		East LA	
Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area		36,300	
<i>Base Prototype</i>			
Studio		0	0%
1 BR		7	35%
2 BR		13	65%
3 BR		0	0%
Total		20	100%
VALUE OF EXISTING UNITS		Total	per Unit
<i>Net Operating Income</i>			
Mkt Rate Revenue	\$1,423	\$/unit/month	
		\$341,620	\$17,081
Gross Revenue		\$341,620	\$17,081
- Operating Expense	30.00%	% gross revenues	
		-\$102,486	-\$5,124
- Vacancy	5.00%	% gross revenues	
		-\$17,081	-\$854
Subtotal - NOI		\$222,053	\$11,103
<i>Sales Revenue</i>			
Capitalized Value	5.25%	noi/value	
		\$4,229,576	\$211,479
Cost of Sale	2.50%	% capitalized value	
		-\$105,739	-\$5,287
Total		\$4,123,837	\$206,192
VALUE OF UNDERLYING LAND		Total	per Unit
Land Acquisition	\$45.00	\$/land sf	
		\$1,633,500	\$81,675
COST TO ACQUIRE (Greater of Existing Units or Land Value)		\$4,123,837	\$206,192

Sources: County staff; Economic & Planning Systems

APPENDIX D

FEASIBILITY OF SUBSTANTIAL RENOVATION OF APARTMENTS
BY SUBMARKET



Table D-1 Estimated Feasibility of Substantial Apartment Renovation – Antelope Valley

Submarket:		Antelope Valley		
Description	Factor Description	Amount	%	
PROGRAM				
Land Area (Sq. Ft.)		65,340		
Gross Building Area (Sq. Ft.)		23,000		
<u>Unit Mix</u>				
Studio		0	0%	
1 BR		0	0%	
2 BR		20	100%	
3 BR		0	0%	
Total		20	100%	
<u>Parking Spaces</u>				
Surface		45		
Structured		0		
VALUE AFTER RENOVATION		Total	Per Unit	
<u>Net Operating Income</u>				
Gross Revenue (Annual)	\$1,490	\$/unit/month	\$357,600	\$17,880
- Operating Expense	30.00%	% gross revenues	-\$107,280	-\$5,364
- Vacancy	5.00%	% gross revenues	-\$17,880	-\$894
Subtotal - NOI			\$232,440	\$11,622
<u>Sales Revenue</u>				
Capitalized Value	5.75%	noi/value	\$4,042,435	\$202,122
Cost of Sale	2.50%	% capitalized value	-\$101,061	-\$5,053
Total			\$3,941,374	\$197,069
RENOVATION COST		Total	Per Unit	
Direct				
Site Improvement	\$2.50	\$/land sf	\$163,350	\$8,168
Renovation	\$60	\$/sf gba	\$1,380,000	\$69,000
Contractor Contingency	10.00%	% site improvement, renovation	\$154,335	\$7,717
Subtotal			\$1,697,685	\$84,884
Indirect	20.00%	% direct costs	\$339,537	\$16,977
Total			\$2,037,222	\$101,861
VALUE / FEASIBILITY METRICS		Total	per Unit	
Value of Existing Units			\$2,429,463	\$121,473
<u>Rehab Net Value</u>				
Total Value of Rehabbed Units			\$3,941,374	\$197,069
- Cost of Rehabilitation			-\$2,037,222	-\$101,861
- Cost of Affordable Unit Replacement		*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Rehabilitation			\$1,904,152	\$95,208
Surplus Value from Rehabilitation		Rehab - Existing	-\$525,311	-\$26,266
% Return		Net Value/Existing Value	-22%	

Sources: County staff, Economic & Planning Systems

Table D-2 Estimated Feasibility of Substantial Apartment Renovation – Coastal South

Submarket:		Coastal South	
Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		21,780	
Gross Building Area (Sq. Ft.)		23,543	
<u>Unit Mix</u>			
Studio		3	15%
1 BR		3	15%
2 BR		14	70%
3 BR		0	0%
Total		20	100%
<u>Parking Spaces</u>			
Surface		0	
Structured		42	
VALUE AFTER RENOVATION		Total	Per Unit
<u>Net Operating Income</u>			
Gross Revenue (Annual)	\$2,864 \$/unit/month	\$687,360	\$34,368
- Operating Expense	30.00% % gross revenues	-\$206,208	-\$10,310
- Vacancy	5.00% % gross revenues	-\$34,368	-\$1,718
Subtotal - NOI		\$446,784	\$22,339
<u>Sales Revenue</u>			
Capitalized Value	4.75% noi/value	\$9,405,979	\$470,299
Cost of Sale	2.50% % capitalized value	-\$235,149	-\$11,757
Total		\$9,170,829	\$458,541
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50 \$/land sf	\$54,450	\$2,723
Renovation	\$78 \$/sf gba	\$1,824,587	\$91,229
Contractor Contingency	10.00% % site improvement, renovation	\$187,904	\$9,395
Subtotal		\$2,066,940	\$103,347
Indirect	20.00% % direct costs	\$413,388	\$20,669
Total		\$2,480,329	\$124,016
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$5,559,269	\$277,963
<u>Rehab Net Value</u>			
Total Value of Rehabbed Units		\$9,170,829	\$458,541
- Cost of Rehabilitation		-\$2,480,329	-\$124,016
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Rehabilitation		\$6,690,501	\$334,525
Surplus Value from Rehabilitation	<i>Rehab - Existing</i>	\$1,131,231	\$56,562
% Return	<i>Net Value/Existing Value</i>	20%	

Sources: County staff; Economic & Planning Systems

Table D-3 Estimated Feasibility of Substantial Apartment Renovation – Santa Clarita

Submarket:		Santa Clarita	
Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		65,340	
Gross Building Area (Sq. Ft.)		22,617	
<u>Unit Mix</u>			
Studio		0	0%
1 BR		7	35%
2 BR		10	50%
3 BR		3	15%
Total		20	100%
<u>Parking Spaces</u>			
Surface		42	
Structured		0	
VALUE AFTER RENOVATION		Total	Per Unit
<u>Net Operating Income</u>			
Gross Revenue (Annual)	\$2,370	\$/unit/month	\$568,800
- Operating Expense	30.00%	% gross revenues	-\$170,640
- Vacancy	5.00%	% gross revenues	-\$28,440
Subtotal - NOI			\$369,720
<u>Sales Revenue</u>			
Capitalized Value	5.75%	noi/value	\$6,429,913
Cost of Sale	2.50%	% capitalized value	-\$160,748
Total			\$6,269,165
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50	\$/land sf	\$163,350
Renovation	\$60	\$/sf gba	\$1,357,000
Contractor Contingency	10.00%	% site improvement, renovation	\$152,035
Subtotal			\$1,672,385
Indirect	20.00%	% direct costs	\$334,477
Total			\$2,006,862
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$3,864,313	\$193,216
<u>Rehab Net Value</u>			
Total Value of Rehabbed Units		\$6,269,165	\$313,458
- Cost of Rehabilitation		-\$2,006,862	-\$100,343
- Cost of Affordable Unit Replacement		\$0	\$0
Net Proceeds from Rehabilitation	*Assumes none for initial feasibility testing	\$4,262,303	\$213,115
Surplus Value from Rehabilitation	Rehab - Existing	\$397,990	\$19,899
% Return	Net Value/Existing Value	10%	

Sources: County staff; Economic & Planning Systems

Table D-4 Estimated Feasibility of Substantial Apartment Renovation – San Gabriel

Submarket:		San Gabriel	
Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		36,300	
Gross Building Area (Sq. Ft.)		27,856	
<i>Unit Mix</i>			
Studio		0	0%
1 BR		0	0%
2 BR		11	55%
3 BR		9	45%
Total		20	100%
<i>Parking Spaces</i>			
Surface		0	
Structured		45	
VALUE AFTER RENOVATION		Total	Per Unit
<i>Net Operating Income</i>			
Gross Revenue (Annual)	\$2,669 \$/unit/month	\$640,440	\$32,022
- Operating Expense	30.00% % gross revenues	-\$192,132	-\$9,607
- Vacancy	5.00% % gross revenues	-\$32,022	-\$1,601
Subtotal - NOI		\$416,286	\$20,814
<i>Sales Revenue</i>			
Capitalized Value	4.75% noi/value	\$8,763,916	\$438,196
Cost of Sale	2.50% % capitalized value	-\$219,098	-\$10,955
Total		\$8,544,818	\$427,241
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50 \$/land sf	\$90,750	\$4,538
Renovation	\$65 \$/sf gba	\$1,810,611	\$90,531
Contractor Contingency	10.00% % site improvement, renovation	\$190,136	\$9,507
Subtotal		\$2,091,497	\$104,575
Indirect	20.00% % direct costs	\$418,299	\$20,915
Total		\$2,509,797	\$125,490
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$5,179,787	\$258,989
<i>Rehab Net Value</i>			
Total Value of Rehabbed Units		\$8,544,818	\$427,241
- Cost of Rehabilitation		-\$2,509,797	-\$125,490
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Rehabilitation		\$6,035,021	\$301,751
Surplus Value from Rehabilitation	<i>Rehab - Existing</i>	\$855,234	\$42,762
% Return	<i>Net Value/Existing Value</i>	17%	

Sources: County staff, Economic & Planning Systems

Table D-5 Estimated Feasibility of Substantial Apartment Renovation – South LA

Submarket:		South LA	
Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		21,780	
Gross Building Area (Sq. Ft.)		21,978	
<u>Unit Mix</u>			
Studio		0	0%
1 BR		8	40%
2 BR		8	40%
3 BR		4	20%
Total		20	100%
<u>Parking Spaces</u>			
Surface		0	
Structured		41	
VALUE AFTER RENOVATION		Total	Per Unit
<u>Net Operating Income</u>			
Gross Revenue (Annual)	\$1,446 \$/unit/month	\$347,040	\$17,352
- Operating Expense	30.00% % gross revenues	-\$104,112	-\$5,206
- Vacancy	5.00% % gross revenues	-\$17,352	-\$868
Subtotal - NOI		\$225,576	\$11,279
<u>Sales Revenue</u>			
Capitalized Value	5.75% noi/value	\$3,923,061	\$196,153
Cost of Sale	2.50% % capitalized value	-\$98,077	-\$4,904
Total		\$3,824,984	\$191,249
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50 \$/land sf	\$54,450	\$2,723
Renovation	\$65 \$/sf gba	\$1,428,556	\$71,428
Contractor Contingency	10.00% % site improvement, renovation	\$148,301	\$7,415
Subtotal		\$1,631,306	\$81,565
Indirect	20.00% % direct costs	\$326,261	\$16,313
Total		\$1,957,567	\$97,878
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$2,357,720	\$117,886
<u>Rehab Net Value</u>			
Total Value of Rehabbed Units		\$3,824,984	\$191,249
- Cost of Rehabilitation		-\$1,957,567	-\$97,878
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Rehabilitation		\$1,867,417	\$93,371
Surplus Value from Rehabilitation	<i>Rehab - Existing</i>	-\$490,303	-\$24,515
% Return	<i>Net Value/Existing Value</i>	-21%	

Sources: County staff, Economic & Planning Systems

Table D-6 Estimated Feasibility of Substantial Apartment Renovation – East LA

Submarket:		East LA	
Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		36,300	
Gross Building Area (Sq. Ft.)		21,563	
<u>Unit Mix</u>			
Studio		0	0%
1 BR		7	35%
2 BR		13	65%
3 BR		0	0%
Total		20	100%
<u>Parking Spaces</u>			
Surface		0	
Structured		42	
VALUE AFTER RENOVATION		Total	Per Unit
<u>Net Operating Income</u>			
Gross Revenue (Annual)	\$2,125 \$/unit/month	\$509,880	\$25,494
- Operating Expense	30.00% % gross revenues	-\$152,964	-\$7,648
- Vacancy	5.00% % gross revenues	-\$25,494	-\$1,275
Subtotal - NOI		\$331,422	\$16,571
<u>Sales Revenue</u>			
Capitalized Value	4.75% noi/value	\$6,977,305	\$348,865
Cost of Sale	2.50% % capitalized value	-\$174,433	-\$8,722
Total		\$6,802,873	\$340,144
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50 \$/land sf	\$90,750	\$4,538
Renovation	\$65 \$/sf gba	\$1,401,563	\$70,078
Contractor Contingency	10.00% % site improvement, renovation	\$149,231	\$7,462
Subtotal		\$1,641,544	\$82,077
Indirect	20.00% % direct costs	\$328,309	\$16,415
Total		\$1,969,853	\$98,493
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$4,123,837	\$206,192
<u>Rehab Net Value</u>			
Total Value of Rehabbed Units		\$6,802,873	\$340,144
- Cost of Rehabilitation		-\$1,969,853	-\$98,493
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Rehabilitation		\$4,833,020	\$241,651
Surplus Value from Rehabilitation	Rehab - Existing	\$709,184	\$35,459
% Return	Net Value/Existing Value	17%	

Sources: County staff; Economic & Planning Systems

APPENDIX E

FEASIBILITY OF CONVERSION TO CONDOMINIUMS BY SUBMARKET



Table E-1 Estimated Feasibility of Conversion to Condominiums – Antelope Valley

Submarket: Antelope Valley

Description	Factor	Description	Amount	%
PROGRAM				
Land Area (Sq. Ft.)			65,340	
GBA (Sq. Ft.)			23,000	
<u>Unit Mix</u>				
Studio			0	0%
1 BR			0	0%
2 BR			20	100%
3 BR			0	0%
Total			20	100%
<u>Parking Spaces</u>				
Surface			45	
Structured			0	
VALUE AFTER CONVERSION			Total	Per Unit
Sales	\$198,000	\$/unit	\$3,960,000	\$198,000
Options	1.00%	% sales	\$39,600	\$1,980
- Cost of Sales/Marketing	5.00%	% sales	-\$198,000	-\$9,900
Total			\$3,801,600	\$190,080
RENOVATION COST			Total	Per Unit
Direct				
Site Improvement	\$2.50	\$/land sf	\$163,350	\$8,168
Renovation	\$63	\$/sf gba	\$1,437,500	\$71,875
Contractor Contingency	10.00%	% site improvement, renovation	\$160,085	\$8,004
Subtotal			\$1,760,935	\$88,047
Indirect	20.00%	% direct costs	\$352,187	\$17,609
Total			\$2,113,122	\$105,656
VALUE / FEASIBILITY METRICS			Total	per Unit
Value of Existing Units			\$2,429,463	\$121,473
<u>Conversion Value</u>				
Total Sales Revenue			\$3,801,600	\$190,080
- Cost of Renovation/Conversion			-\$2,113,122	-\$105,656
- Cost of Affordable Unit Replacement		*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Conversion			\$1,688,478	\$84,424
Surplus Value from Conversion		Conversion - Existing	-\$740,985	-\$37,049
% Return		Net Value/Existing Value		-30%

Sources: County staff; Economic & Planning Systems

Table E-2 Estimated Feasibility of Conversion to Condominiums – Coastal South

Submarket: Coastal South

Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		21,780	
GBA (Sq. Ft.)		23,543	
<u>Unit Mix</u>			
Studio		3	15%
1 BR		3	15%
2 BR		14	70%
3 BR		0	0%
Total		20	100%
<u>Parking Spaces</u>			
Surface		0	
Structured		42	
VALUE AFTER CONVERSION		Total	Per Unit
Sales	\$479,050	\$/unit	\$9,581,000
Options	1.00%	% sales	\$95,810
- Cost of Sales/Marketing	5.00%	% sales	-\$479,050
Total			\$9,197,760
			\$459,888
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50	\$/land sf	\$54,450
Renovation	\$80	\$/sf gba	\$1,883,444
Contractor Contingency	10.00%	% site improvement, renovation	\$193,789
Subtotal			\$2,131,684
Indirect	20.00%	% direct costs	\$426,337
Total			\$2,558,021
			\$127,901
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$5,559,269	\$277,963
<u>Conversion Value</u>			
Total Sales Revenue		\$9,197,760	\$459,888
- Cost of Renovation/Conversion		-\$2,558,021	-\$127,901
- Cost of Affordable Unit Replacement	<i>*Assumes none for initial feasibility testing</i>		\$0
Net Proceeds from Conversion		\$6,639,739	\$331,987
Surplus Value from Conversion		\$1,080,470	\$54,023
% Return	<i>Conversion - Existing Net Value/Existing Value</i>		19%

Sources: County staff; Economic & Planning Systems

Table E-3 Estimated Feasibility of Conversion to Condominiums – Santa Clarita

Submarket: Santa Clarita

Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		65,340	
GBA (Sq. Ft.)		22,617	
<u>Unit Mix</u>			
Studio		0	0%
1 BR		7	35%
2 BR		10	50%
3 BR		3	15%
Total		20	100%
<u>Parking Spaces</u>			
Surface		42	
Structured		0	
VALUE AFTER CONVERSION		Total	Per Unit
Sales	\$345,150	\$6,903,000	\$345,150
Options	1.00%	\$69,030	\$3,452
- Cost of Sales/Marketing	5.00%	-\$345,150	-\$17,258
Total		\$6,626,880	\$331,344
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50	\$/land sf	\$163,350
Renovation	\$63	\$/sf gba	\$1,413,542
Contractor Contingency	10.00%	% site improvement, renovation	\$157,689
Subtotal		\$1,734,581	\$86,729
Indirect	20.00%	% direct costs	\$346,916
Total		\$2,081,497	\$104,075
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$3,864,313	\$193,216
<u>Conversion Value</u>			
Total Sales Revenue		\$6,626,880	\$331,344
- Cost of Renovation/Conversion		-\$2,081,497	-\$104,075
- Cost of Affordable Unit Replacement	<i>*Assumes none for initial feasibility testing</i>		\$0
Net Proceeds from Conversion		\$4,545,383	\$227,269
Surplus Value from Conversion		\$681,070	\$34,053
% Return	<i>Conversion - Existing Net Value/Existing Value</i>		18%

Sources: County staff; Economic & Planning Systems

Table E-4 Estimated Feasibility of Conversion to Condominiums – San Gabriel

Submarket: San Gabriel

Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		36,300	
GBA (Sq. Ft.)		27,856	
<u>Unit Mix</u>			
Studio		0	0%
1 BR		0	0%
2 BR		11	55%
3 BR		9	45%
Total		20	100%
<u>Parking Spaces</u>			
Surface		0	
Structured		45	
VALUE AFTER CONVERSION		Total	Per Unit
Sales	\$632,200	\$12,644,000	\$632,200
Options	1.00%	\$126,440	\$6,322
- Cost of Sales/Marketing	5.00%	-\$632,200	-\$31,610
Total		\$12,138,240	\$606,912
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50	\$90,750	\$4,538
Renovation	\$68	\$1,880,250	\$94,013
Contractor Contingency	10.00%	\$197,100	\$9,855
Subtotal		\$2,168,100	\$108,405
Indirect	20.00%	\$433,620	\$21,681
Total		\$2,601,720	\$130,086
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$5,179,787	\$258,989
<u>Conversion Value</u>			
Total Sales Revenue		\$12,138,240	\$606,912
- Cost of Renovation/Conversion		-\$2,601,720	-\$130,086
- Cost of Affordable Unit Replacement	<i>*Assumes none for initial feasibility testing</i>	\$0	\$0
Net Proceeds from Conversion		\$9,536,520	\$476,826
Surplus Value from Conversion		\$4,356,733	\$217,837
% Return	<i>Conversion - Existing Net Value/Existing Value</i>	84%	

Sources: County staff; Economic & Planning Systems

Table E-5 Estimated Feasibility of Conversion to Condominiums – South LA

Submarket:

South LA

Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		21,780	
GBA (Sq. Ft.)		21,978	
<u>Unit Mix</u>			
Studio		0	0%
1 BR		8	40%
2 BR		8	40%
3 BR		4	20%
Total		20	100%
<u>Parking Spaces</u>			
Surface		0	
Structured		41	
VALUE AFTER CONVERSION		Total	Per Unit
Sales	\$378,400	\$7,568,000	\$378,400
Options	1.00%	\$75,680	\$3,784
- Cost of Sales/Marketing	5.00%	-\$378,400	-\$18,920
Total		\$7,265,280	\$363,264
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50	\$54,450	\$2,723
Renovation	\$68	\$1,483,500	\$74,175
Contractor Contingency	10.00%	\$153,795	\$7,690
Subtotal		\$1,691,745	\$84,587
Indirect	20.00%	\$338,349	\$16,917
		% direct costs	
Total		\$2,030,094	\$101,505
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$2,357,720	\$117,886
<u>Conversion Value</u>			
Total Sales Revenue		\$7,265,280	\$363,264
- Cost of Renovation/Conversion		-\$2,030,094	-\$101,505
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Conversion		\$5,235,186	\$261,759
Surplus Value from Conversion		\$2,877,466	\$143,873
% Return	Conversion - Existing Net Value/Existing Value	122%	

Sources: County staff; Economic & Planning Systems

Table E-6 Estimated Feasibility of Conversion to Condominiums – East LA

Submarket:

East LA

Description	Factor Description	Amount	%
PROGRAM			
Land Area (Sq. Ft.)		36,300	
GBA (Sq. Ft.)		21,563	
<u>Unit Mix</u>			
Studio		0	0%
1 BR		7	35%
2 BR		13	65%
3 BR		0	0%
Total		20	100%
<u>Parking Spaces</u>			
Surface		0	
Structured		42	
VALUE AFTER CONVERSION		Total	Per Unit
Sales	\$413,438	\$8,268,750	\$413,438
Options	1.00%	\$82,688	\$4,134
- Cost of Sales/Marketing	5.00%	-\$413,438	-\$20,672
Total		\$7,938,000	\$396,900
RENOVATION COST		Total	Per Unit
Direct			
Site Improvement	\$2.50	\$90,750	\$4,538
Renovation	\$68	\$1,455,469	\$72,773
Contractor Contingency	10.00%	\$154,622	\$7,731
Subtotal		\$1,700,841	\$85,042
Indirect	20.00%	\$340,168	\$17,008
Total		\$2,041,009	\$102,050
VALUE / FEASIBILITY METRICS		Total	per Unit
Value of Existing Units		\$4,123,837	\$206,192
<u>Conversion Value</u>			
Total Sales Revenue		\$7,938,000	\$396,900
- Cost of Renovation/Conversion		-\$2,041,009	-\$102,050
- Cost of Affordable Unit Replacement	<i>*Assumes none for initial feasibility testing</i>	\$0	\$0
Net Proceeds from Conversion		\$5,896,991	\$294,850
Surplus Value from Conversion		\$1,773,155	\$88,658
% Return	<i>Conversion - Existing Net Value/Existing Value</i>	43%	

Sources: County staff; Economic & Planning Systems

APPENDIX F

FEASIBILITY OF REDEVELOPMENT FOR APARTMENTS BY SUBMARKET



Table F-1 Estimated Feasibility of Redevelopment for Apartments – Antelope Valley

Submarket: Antelope Valley

Description	Factor	Description	Amount	%
ASSUMPTIONS				
PROGRAM				
Land Area (Sq. Ft.)			65,340	
GBA (Sq. Ft.)			31,050	
<u>Market Rate</u>				
Studio			0	0%
1 BR			0	0%
2 BR			23	100%
3 BR			0	0%
Subtotal			23	85%
<u>Inclusionary</u>				
Studio			0	0%
1 BR			0	0%
2 BR			4	100%
3 BR			0	0%
Subtotal			4	15%
Total Units			27	
<u>Parking Spaces</u>				
Surface			54	
Structured			0	
VALUE OF NEW UNITS			Total	Per Unit
<u>Net Operating Income</u>				
Mkt Rate Revenue	\$1,490	\$/unit/month	\$411,240	\$17,880
Affordable Revenue	\$986	\$/unit/month	\$47,347	\$11,837
Gross Revenue			\$458,587	\$16,985
- Operating Expense	30.00%	% gross revenues	-\$137,576	-\$5,095
- Vacancy	5.00%	% gross revenues	-\$22,929	-\$849
Subtotal - NOI			\$298,082	\$11,040
<u>Sales Revenue</u>				
Capitalized Value	5.75%	noi/value	\$5,184,029	\$192,001
Cost of Sale	2.50%	% capitalized value	-\$129,601	-\$4,800
Total			\$5,054,428	\$187,201
REDEVELOPMENT COST			Total	Per Unit
Direct				
Demolition	\$7,200	\$/existing unit	\$144,000	\$5,333
Site Improvement	\$5.00	\$/land sf	\$326,700	\$12,100
Vertical	\$120	\$/gba	\$3,726,000	\$138,000
Structured Parking	\$5,000	\$/space	\$270,000	\$10,000
Structured Parking	\$23,375	\$/space	\$0	\$0
Contractor Contingency	10.00%	% of other direct costs	\$446,670	\$16,543
Subtotal			\$4,913,370	\$181,977
Indirect	36.75%	% direct costs	\$1,805,663	\$66,876
Total			\$6,719,033	\$248,853
VALUE / FEASIBILITY METRICS			Total	Per Unit
Value of Existing Units	\$121,473	\$/unit	\$2,429,463	\$89,980
<u>Redevelopment Value</u>				
Total Sales Revenue			\$5,054,428	\$187,201
- Redevelopment Cost			-\$6,719,033	-\$248,853
- Cost of Affordable Unit Replacement		*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment			-\$1,664,605	-\$61,652
Surplus Value from Redevelopment		Redev - Existing	-\$4,094,068	-\$151,632
% Return		Net Value/Existing Value	-169%	

Sources: County staff; Economic & Planning Systems

Table F-2 Estimated Feasibility of Redevelopment for Apartments – Coastal South

Submarket:

Coastal South

Description	Factor	Description	Amount	%
ASSUMPTIONS				
PROGRAM				
Land Area (Sq. Ft.)			21,780	
GBA (Sq. Ft.)			31,146	
<u>Market Rate</u>				
Studio			4	17%
1 BR			4	17%
2 BR			15	65%
3 BR			0	0%
Subtotal			23	85%
<u>Inclusionary</u>				
Studio			1	25%
1 BR			1	25%
2 BR			2	50%
3 BR			0	0%
Subtotal			4	15%
Total Units			27	
<u>Parking Spaces</u>				
Surface			0	
Structured			44	
VALUE OF NEW UNITS			Total	Per Unit
<u>Net Operating Income</u>				
Mkt Rate Revenue	\$2,834	\$/unit/month	\$782,280	\$34,012
Affordable Revenue	\$905	\$/unit/month	\$43,416	\$10,854
Gross Revenue			\$825,696	\$30,581
- Operating Expense	30.00%	% gross revenues	-\$247,709	-\$9,174
- Vacancy	5.00%	% gross revenues	-\$41,285	-\$1,529
Subtotal - NOI			\$536,702	\$19,878
<u>Sales Revenue</u>				
Capitalized Value	4.75%	noi/value	\$11,298,998	\$418,481
Cost of Sale	2.50%	% capitalized value	-\$282,475	-\$10,462
Total			\$11,016,523	\$408,019
REDEVELOPMENT COST			Total	Per Unit
Direct				
Demolition	\$7,370	\$/existing unit	\$147,400	\$5,459
Site Improvement	\$5.00	\$/land sf	\$108,900	\$4,033
Vertical	\$155	\$/gba	\$4,827,604	\$178,800
Structured Parking	\$5,000	\$/space	\$0	\$0
Structured Parking	\$23,375	\$/space	\$1,028,500	\$38,093
Contractor Contingency	10.00%	% of other direct costs	\$611,240	\$22,639
Subtotal			\$6,723,645	\$249,024
Indirect	36.75%	% direct costs	\$2,470,939	\$91,516
Total			\$9,194,584	\$340,540
VALUE / FEASIBILITY METRICS			Total	Per Unit
Value of Existing Units	\$277,963	\$/unit	\$5,559,269	\$205,899
<u>Redevelopment Value</u>				
Total Sales Revenue			\$11,016,523	\$408,019
- Redevelopment Cost			-\$9,194,584	-\$340,540
- Cost of Affordable Unit Replacement		*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment			\$1,821,939	\$67,479
Surplus Value from Redevelopment		Redev - Existing	-\$3,737,331	-\$138,420
% Return		Net Value/Existing Value	-67%	

Sources: County staff; Economic & Planning Systems

Table F-3 Estimated Feasibility of Redevelopment for Apartments – Santa Clarita

Submarket:

Santa Clarita

Description	Factor	Description	Amount	%
ASSUMPTIONS				
PROGRAM				
Land Area (Sq. Ft.)			65,340	
GBA (Sq. Ft.)			30,858	
<u>Market Rate</u>				
Studio			0	0%
1 BR			8	35%
2 BR			11	48%
3 BR			4	17%
Subtotal			23	85%
<u>Inclusionary</u>				
Studio			0	0%
1 BR			1	25%
2 BR			2	50%
3 BR			1	25%
Subtotal			4	15%
Total Units			27	
<u>Parking Spaces</u>				
Surface			45	
Structured			0	
VALUE OF NEW UNITS			Total	Per Unit
<u>Net Operating Income</u>				
Mkt Rate Revenue	\$2,383	\$/unit/month	\$657,720	\$28,597
Affordable Revenue	\$987	\$/unit/month	\$47,362	\$11,840
Gross Revenue			\$705,082	\$26,114
- Operating Expense	30.00%	% gross revenues	-\$211,524	-\$7,834
- Vacancy	5.00%	% gross revenues	-\$35,254	-\$1,306
Subtotal - NOI			\$458,303	\$16,974
<u>Sales Revenue</u>				
Capitalized Value	5.75%	noi/value	\$7,970,488	\$295,203
Cost of Sale	2.50%	% capitalized value	-\$199,262	-\$7,380
Total			\$7,771,225	\$287,823
REDEVELOPMENT COST			Total	Per Unit
Direct				
Demolition	\$7,080	\$/existing unit	\$141,600	\$5,244
Site Improvement	\$5.00	\$/land sf	\$326,700	\$12,100
Vertical	\$120	\$/gba	\$3,703,000	\$137,148
Structured Parking	\$5,000	\$/space	\$225,000	\$8,333
Structured Parking	\$23,375	\$/space	\$0	\$0
Contractor Contingency	10.00%	% of other direct costs	\$439,630	\$16,283
Subtotal			\$4,835,930	\$179,109
Indirect	36.75%	% direct costs	\$1,777,204	\$65,822
Total			\$6,613,134	\$244,931
VALUE / FEASIBILITY METRICS			Total	Per Unit
Value of Existing Units	\$193,216	\$/unit	\$3,864,313	\$143,123
<u>Redevelopment Value</u>				
Total Sales Revenue			\$7,771,225	\$287,823
- Redevelopment Cost			-\$6,613,134	-\$244,931
- Cost of Affordable Unit Replacement			\$0	\$0
Net Proceeds from Redevelopment		<i>*Assumes none for initial feasibility testing</i>	\$1,158,091	\$42,892
Surplus Value from Redevelopment		<i>Redev - Existing</i>	-\$2,706,222	-\$100,230
% Return		<i>Net Value/Existing Value</i>	-70%	

Sources: County staff, Economic & Planning Systems

Table F-4 Estimated Feasibility of Redevelopment for Apartments – San Gabriel

Submarket:

San Gabriel

Description	Factor	Description	Amount	%
ASSUMPTIONS				
PROGRAM				
Land Area (Sq. Ft.)			36,300	
GBA (Sq. Ft.)			37,822	
<u>Market Rate</u>				
Studio			0	0%
1 BR			0	0%
2 BR			12	52%
3 BR			11	48%
Subtotal			23	85%
<u>Inclusionary</u>				
Studio			0	0%
1 BR			0	0%
2 BR			2	50%
3 BR			2	50%
Subtotal			4	15%
Total Units			27	
<u>Parking Spaces</u>				
Surface			0	
Structured			54	
			Total	Per Unit
<u>Net Operating Income</u>				
Mkt Rate Revenue	\$2,678	\$/unit/month	\$739,080	\$32,134
Affordable Revenue	\$1,042	\$/unit/month	\$49,997	\$12,499
Gross Revenue			\$789,077	\$29,225
- Operating Expense	30.00%	% gross revenues	-\$236,723	-\$8,768
- Vacancy	5.00%	% gross revenues	-\$39,454	-\$1,461
Subtotal - NOI			\$512,900	\$18,996
<u>Sales Revenue</u>				
Capitalized Value	4.75%	noi/value	\$10,797,893	\$399,922
Cost of Sale	2.50%	% capitalized value	-\$269,947	-\$9,998
Total			\$10,527,946	\$389,924
REDEVELOPMENT COST			Total	Per Unit
Direct				
Demolition	\$8,720	\$/existing unit	\$174,400	\$6,459
Site Improvement	\$5.00	\$/land sf	\$181,500	\$6,722
Vertical	\$130	\$/gba	\$4,916,889	\$182,107
Structured Parking	\$5,000	\$/space	\$0	\$0
Structured Parking	\$23,375	\$/space	\$1,262,250	\$46,750
Contractor Contingency	10.00%	% of other direct costs	\$653,504	\$24,204
Subtotal			\$7,188,543	\$266,242
Indirect	36.75%	% direct costs	\$2,641,789	\$97,844
Total			\$9,830,332	\$364,086
VALUE / FEASIBILITY METRICS			Total	Per Unit
Value of Existing Units	\$258,989	\$/unit	\$5,179,787	\$191,844
<u>Redevelopment Value</u>				
Total Sales Revenue			\$10,527,946	\$389,924
- Redevelopment Cost			-\$9,830,332	-\$364,086
- Cost of Affordable Unit Replacement		*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment			\$697,613	\$25,838
Surplus Value from Redevelopment		Redev - Existing	-\$4,482,174	-\$166,006
% Return		Net Value/Existing Value	-87%	

Sources: County staff; Economic & Planning Systems

Table F-5 Estimated Feasibility of Redevelopment for Apartments – South LA

Submarket:

South LA

Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area (Sq. Ft.)		21,780	
GBA (Sq. Ft.)		29,900	
<u>Market Rate</u>			
Studio		0	0%
1 BR		9	39%
2 BR		9	39%
3 BR		5	22%
Subtotal		23	85%
<u>Inclusionary</u>			
Studio		0	0%
1 BR		1	25%
2 BR		2	50%
3 BR		1	25%
Subtotal		4	15%
Total Units		27	
<u>Parking Spaces</u>			
Surface		0	
Structured		44	
VALUE OF NEW UNITS		Total	Per Unit
<u>Net Operating Income</u>			
Mkt Rate Revenue	\$1,452 \$/unit/month	\$400,680	\$17,421
Affordable Revenue	\$987 \$/unit/month	\$47,362	\$11,840
Gross Revenue		\$448,042	\$16,594
- Operating Expense	30.00% % gross revenues	-\$134,412	-\$4,978
- Vacancy	5.00% % gross revenues	-\$22,402	-\$830
Subtotal - NOI		\$291,227	\$10,786
<u>Sales Revenue</u>			
Capitalized Value	5.75% noi/value	\$5,064,818	\$187,586
Cost of Sale	2.50% % capitalized value	-\$126,620	-\$4,690
Total		\$4,938,198	\$182,896
REDEVELOPMENT COST		Total	Per Unit
Direct			
Demolition	\$6,880 \$/existing unit	\$137,600	\$5,096
Site Improvement	\$5.00 \$/land sf	\$108,900	\$4,033
Vertical	\$130 \$/gba	\$3,887,000	\$143,963
Structured Parking	\$5,000 \$/space	\$0	\$0
Structured Parking	\$23,375 \$/space	\$1,028,500	\$38,093
Contractor Contingency	10.00% % of other direct costs	\$516,200	\$19,119
Subtotal		\$5,678,200	\$210,304
Indirect	36.75% % direct costs	\$2,086,739	\$77,287
Total		\$7,764,939	\$287,590
VALUE / FEASIBILITY METRICS		Total	Per Unit
Value of Existing Units	\$117,886 \$/unit	\$2,357,720	\$87,323
<u>Redevelopment Value</u>			
Total Sales Revenue		\$4,938,198	\$182,896
- Redevelopment Cost		-\$7,764,939	-\$287,590
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment		-\$2,826,741	-\$104,694
Surplus Value from Redevelopment	Redev - Existing	-\$5,184,461	-\$192,017
% Return	Net Value/Existing Value	-220%	

Sources: County staff; Economic & Planning Systems

Table F-6 Estimated Feasibility of Redevelopment for Apartments – East LA

Submarket:

East LA

Description	Factor	Description	Amount	%
ASSUMPTIONS				
PROGRAM				
Land Area (Sq. Ft.)			36,300	
GBA (Sq. Ft.)			28,846	
<u>Market Rate</u>				
Studio			0	0%
1 BR			8	35%
2 BR			15	65%
3 BR			0	0%
Subtotal			23	85%
<u>Inclusionary</u>				
Studio			0	0%
1 BR			2	50%
2 BR			2	50%
3 BR			0	0%
Subtotal			4	15%
Total Units			27	
<u>Parking Spaces</u>				
Surface			0	
Structured			44	
VALUE OF NEW UNITS			Total	Per Unit
<u>Net Operating Income</u>				
Mkt Rate Revenue	\$2,125	\$/unit/month	\$586,560	\$25,503
Affordable Revenue	\$932	\$/unit/month	\$44,726	\$11,182
Gross Revenue			\$631,286	\$23,381
- Operating Expense	30.00%	% gross revenues	-\$189,386	-\$7,014
- Vacancy	5.00%	% gross revenues	-\$31,564	-\$1,169
Subtotal - NOI			\$410,336	\$15,198
<u>Sales Revenue</u>				
Capitalized Value	4.75%	noi/value	\$8,638,656	\$319,950
Cost of Sale	2.50%	% capitalized value	-\$215,966	-\$7,999
Total			\$8,422,690	\$311,951
REDEVELOPMENT COST			Total	Per Unit
Direct				
Demolition	\$6,750	\$/existing unit	\$135,000	\$5,000
Site Improvement	\$5.00	\$/land sf	\$181,500	\$6,722
Vertical	\$130	\$/gba	\$3,749,958	\$138,887
Structured Parking	\$5,000	\$/space	\$0	\$0
Structured Parking	\$23,375	\$/space	\$1,028,500	\$38,093
Contractor Contingency	10.00%	% of other direct costs	\$509,496	\$18,870
Subtotal			\$5,604,454	\$207,572
Indirect	36.75%	% direct costs	\$2,059,637	\$76,283
Total			\$7,664,091	\$283,855
VALUE / FEASIBILITY METRICS			Total	Per Unit
Value of Existing Units	\$206,192	\$/unit	\$4,123,837	\$152,735
<u>Redevelopment Value</u>				
Total Sales Revenue			\$8,422,690	\$311,951
- Redevelopment Cost			-\$7,664,091	-\$283,855
- Cost of Affordable Unit Replacement		*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment			\$758,599	\$28,096
Surplus Value from Redevelopment		Redev - Existing	-\$3,365,238	-\$124,638
% Return		Net Value/Existing Value	-82%	

Sources: County staff, Economic & Planning Systems

APPENDIX G

FEASIBILITY OF REDEVELOPMENT FOR CONDOMINIUMS BY SUBMARKET



Table G-1 Estimated Feasibility of Redevelopment for Condominiums – Antelope Valley

Submarket:

Antelope Valley

Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area (Sq. Ft.)		65,340	
GBA (Sq. Ft.)		31,050	
<u>Market Rate</u>			
Studio		0	0%
1 BR		0	0%
2 BR		27	100%
3 BR		0	0%
Subtotal		27	100%
<u>Inclusionary</u>			
	0%		
Studio		0.0	0%
1 BR		0.0	0%
2 BR		0.0	100%
3 BR		0.0	0%
Subtotal		0.0	100%
Total Units			
		27	
<u>Parking Spaces</u>			
Surface		54	
Structured		0	
AFFORDABILITY			
<u>Sale Price @ 130% of AMI</u>			
Studio		\$358,000	
1 BR		\$409,000	
2 BR		\$460,000	
3 BR		\$511,000	
VALUE OF NEW UNITS		Total	per Unit
<u>Net Operating Income</u>			
Mkt Rate Sales	\$198,000 \$/unit	\$5,346,000	\$198,000
Affordable Sales	\$198,000 \$/unit (lesser of price at 135% AMI or market value)	\$0	N/A
Sales Revenue		\$5,346,000	\$198,000
Options	1.00% % gross revenues	\$53,460	\$1,980
- Cost of Sales/Marketing	5.00% % gross revenues	-\$267,300	-\$9,900
Total		\$5,132,160	\$190,080
REDEVELOPMENT COST		Total	per Unit
Direct			
Demolition	\$7,200 \$/existing unit	\$144,000	\$5,333
Site Improvement	\$10.00 \$/land sf	\$653,400	\$24,200
Vertical	\$125 \$/gba	\$3,881,250	\$143,750
Structured Parking	\$5,000 \$/space	\$270,000	\$10,000
Structured Parking	\$23,375 \$/space	\$0	\$0
Contractor Contingency	10.00% % of other direct costs	\$494,865	\$18,328
Subtotal		\$5,443,515	\$201,612
Indirect	41.75% % direct costs	\$2,272,668	\$84,173
Total		\$7,716,183	\$285,785
VALUE / FEASIBILITY METRICS		Total	Per Unit
Value of Existing Units	\$121,473 \$/unit	\$2,429,463	\$89,980
<u>Redevelopment Value</u>			
Total Sales Revenue		\$5,132,160	\$190,080
- Redevelopment Cost		-\$7,716,183	-\$285,785
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment		-\$2,584,023	-\$95,705
Surplus Value from Redevelopment	Redev - Existing	-\$5,013,485	-\$185,685
% Return	Net Value/Existing Value	-206%	

Sources: County staff, Economic & Planning Systems

Table G-2 Estimated Feasibility of Redevelopment for Condominiums – Coastal South

Submarket:

Coastal South

Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area (Sq. Ft.)		21,780	
GBA (Sq. Ft.)		31,146	
<u>Market Rate</u>			
Studio		3	15%
1 BR		3	15%
2 BR		15	70%
3 BR		0	0%
Subtotal		22	100%
<u>Inclusionary</u>			
	20%		
Studio		0.8	15%
1 BR		0.8	15%
2 BR		3.8	70%
3 BR		0.0	0%
Subtotal		5.4	100%
Total Units		27	
<u>Parking Spaces</u>			
Surface		0	
Structured		44	
AFFORDABILITY			
<u>Sale Price @ 130% of AMI</u>			
Studio		\$358,000	
1 BR		\$409,000	
2 BR		\$460,000	
3 BR		\$511,000	
VALUE OF NEW UNITS		Total	per Unit
<u>Net Operating Income</u>			
Mkt Rate Sales	\$479,050 \$/unit	\$10,347,480	\$479,050
Affordable Sales	\$437,050 \$/unit (lesser of price at 135% AMI or market value)	\$2,360,070	\$437,050
Sales Revenue		\$12,707,550	\$470,650
Options	1.00% % gross revenues	\$127,076	\$4,707
- Cost of Sales/Marketing	5.00% % gross revenues	-\$635,378	-\$23,533
Total		\$12,199,248	\$451,824
REDEVELOPMENT COST		Total	per Unit
Direct			
Demolition	\$7,370 \$/existing unit	\$147,400	\$5,459
Site Improvement	\$10.00 \$/land sf	\$217,800	\$8,067
Vertical	\$160 \$/gba	\$4,983,333	\$184,568
Structured Parking	\$5,000 \$/space	\$0	\$0
Structured Parking	\$23,375 \$/space	\$1,028,500	\$38,093
Contractor Contingency	10.00% % of other direct costs	\$637,703	\$23,619
Subtotal		\$7,014,737	\$259,805
Indirect	41.75% % direct costs	\$2,928,653	\$108,469
Total		\$9,943,389	\$368,274
VALUE / FEASIBILITY METRICS		Total	Per Unit
Value of Existing Units	\$277,963 \$/unit	\$5,559,269	\$205,899
<u>Redevelopment Value</u>			
Total Sales Revenue		\$12,199,248	\$451,824
- Redevelopment Cost		-\$9,943,389	-\$368,274
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment		\$2,255,859	\$83,550
Surplus Value from Redevelopment	Redev - Existing	-\$3,303,411	-\$122,349
% Return	Net Value/Existing Value	-59%	

Sources: County staff, Economic & Planning Systems

Table G-3 Estimated Feasibility of Redevelopment for Condominiums – Santa Clarita

Submarket:

Santa Clarita

Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area (Sq. Ft.)		65,340	
GBA (Sq. Ft.)		30,858	
<u>Market Rate</u>			
Studio		0	0%
1 BR		9	35%
2 BR		14	50%
3 BR		4	15%
Subtotal		27	100%
<u>Inclusionary</u>			
Studio	0%	0.0	0%
1 BR		0.0	35%
2 BR		0.0	50%
3 BR		0.0	15%
Subtotal		0.0	100%
Total Units		27	
<u>Parking Spaces</u>			
Surface		45	
Structured		0	
AFFORDABILITY			
<u>Sale Price @ 130% of AMI</u>			
Studio		\$358,000	
1 BR		\$409,000	
2 BR		\$460,000	
3 BR		\$511,000	
VALUE OF NEW UNITS		Total	per Unit
<u>Net Operating Income</u>			
Mkt Rate Sales	\$345,150 \$/unit	\$9,319,050	\$345,150
Affordable Sales	\$345,150 \$/unit (lesser of price at 135% AMI or market value)	\$0	N/A
Sales Revenue		\$9,319,050	\$345,150
Options	1.00% % gross revenues	\$93,191	\$3,452
- Cost of Sales/Marketing	5.00% % gross revenues	-\$465,953	-\$17,258
Total		\$8,946,288	\$331,344
REDEVELOPMENT COST		Total	per Unit
Direct			
Demolition	\$7,080 \$/existing unit	\$141,600	\$5,244
Site Improvement	\$10.00 \$/land sf	\$653,400	\$24,200
Vertical	\$125 \$/gba	\$3,857,292	\$142,863
Structured Parking	\$5,000 \$/space	\$225,000	\$8,333
Structured Parking	\$23,375 \$/space	\$0	\$0
Contractor Contingency	10.00% % of other direct costs	\$487,729	\$18,064
Subtotal		\$5,365,021	\$198,704
Indirect	41.75% % direct costs	\$2,239,896	\$82,959
Total		\$7,604,917	\$281,664
VALUE / FEASIBILITY METRICS		Total	Per Unit
Value of Existing Units	\$193,216 \$/unit	\$3,864,313	\$143,123
<u>Redevelopment Value</u>			
Total Sales Revenue		\$8,946,288	\$331,344
- Redevelopment Cost		-\$7,604,917	-\$281,664
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment		\$1,341,371	\$49,680
Surplus Value from Redevelopment	Redev - Existing	-\$2,522,942	-\$93,442
% Return	Net Value/Existing Value	-65%	

Sources: County staff, Economic & Planning Systems

Table G-4 Estimated Feasibility of Redevelopment for Condominiums – San Gabriel

Submarket:

San Gabriel

Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area (Sq. Ft.)		36,300	
GBA (Sq. Ft.)		37,822	
<u>Market Rate</u>			
Studio		0	0%
1 BR		0	0%
2 BR		13	55%
3 BR		10	45%
Subtotal		23	100%
<u>Inclusionary</u>			
	15%		
Studio		0.0	0%
1 BR		0.0	0%
2 BR		2.3	55%
3 BR		1.8	45%
Subtotal		4.1	100%
Total Units		27	
<u>Parking Spaces</u>			
Surface		0	
Structured		54	
AFFORDABILITY			
<u>Sale Price @ 130% of AMI</u>			
Studio		\$358,000	
1 BR		\$409,000	
2 BR		\$460,000	
3 BR		\$511,000	
VALUE OF NEW UNITS		Total	per Unit
<u>Net Operating Income</u>			
Mkt Rate Sales	\$632,200 \$/unit	\$14,477,380	\$632,200
Affordable Sales	\$482,950 \$/unit (lesser of price at 135% AMI or market value)	\$1,980,095	\$482,950
Sales Revenue		\$16,457,475	\$609,536
Options	1.00% % gross revenues	\$164,575	\$6,095
- Cost of Sales/Marketing	5.00% % gross revenues	-\$822,874	-\$30,477
Total		\$15,799,176	\$585,155
REDEVELOPMENT COST		Total	per Unit
Direct			
Demolition	\$8,720 \$/existing unit	\$174,400	\$6,459
Site Improvement	\$10.00 \$/land sf	\$363,000	\$13,444
Vertical	\$135 \$/gba	\$5,106,000	\$189,111
Structured Parking	\$5,000 \$/space	\$0	\$0
Structured Parking	\$23,375 \$/space	\$1,262,250	\$46,750
Contractor Contingency	10.00% % of other direct costs	\$690,565	\$25,576
Subtotal		\$7,596,215	\$281,341
Indirect	41.75% % direct costs	\$3,171,420	\$117,460
Total		\$10,767,635	\$398,801
VALUE / FEASIBILITY METRICS		Total	Per Unit
Value of Existing Units	\$258,989 \$/unit	\$5,179,787	\$191,844
<u>Redevelopment Value</u>			
Total Sales Revenue		\$15,799,176	\$585,155
- Redevelopment Cost		-\$10,767,635	-\$398,801
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment		\$5,031,541	\$186,353
Surplus Value from Redevelopment	Redev - Existing	-\$148,246	-\$5,491
% Return	Net Value/Existing Value	-3%	

Sources: County staff, Economic & Planning Systems

Table G-5 Estimated Feasibility of Redevelopment for Condominiums – South LA

Submarket:

South LA

Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area (Sq. Ft.)		21,780	
GBA (Sq. Ft.)		29,900	
<u>Market Rate</u>			
Studio		0	0%
1 BR		9	40%
2 BR		9	40%
3 BR		4	20%
Subtotal		22	100%
<u>Inclusionary</u>			
Studio	20%	0.0	0%
1 BR		2.2	40%
2 BR		2.2	40%
3 BR		1.1	20%
Subtotal		5.4	100%
Total Units		27	
<u>Parking Spaces</u>			
Surface		0	
Structured		44	
AFFORDABILITY			
<u>Sale Price @ 130% of AMI</u>			
Studio		\$358,000	
1 BR		\$409,000	
2 BR		\$460,000	
3 BR		\$511,000	
VALUE OF NEW UNITS		Total	per Unit
<u>Net Operating Income</u>			
Mkt Rate Sales	\$378,400 \$/unit	\$8,173,440	\$378,400
Affordable Sales	\$378,400 \$/unit (lesser of price at 135% AMI or market value)	\$2,043,360	\$378,400
Sales Revenue		\$10,216,800	\$378,400
Options	1.00% % gross revenues	\$102,168	\$3,784
- Cost of Sales/Marketing	5.00% % gross revenues	-\$510,840	-\$18,920
Total		\$9,808,128	\$363,264
REDEVELOPMENT COST		Total	per Unit
Direct			
Demolition	\$6,880 \$/existing unit	\$137,600	\$5,096
Site Improvement	\$10.00 \$/land sf	\$217,800	\$8,067
Vertical	\$135 \$/gba	\$4,036,500	\$149,500
Structured Parking	\$5,000 \$/space	\$0	\$0
Structured Parking	\$23,375 \$/space	\$1,028,500	\$38,093
Contractor Contingency	10.00% % of other direct costs	\$542,040	\$20,076
Subtotal		\$5,962,440	\$220,831
Indirect	41.75% % direct costs	\$2,489,319	\$92,197
Total		\$8,451,759	\$313,028
VALUE / FEASIBILITY METRICS		Total	Per Unit
Value of Existing Units	\$117,886 \$/unit	\$2,357,720	\$87,323
<u>Redevelopment Value</u>			
Total Sales Revenue		\$9,808,128	\$363,264
- Redevelopment Cost		-\$8,451,759	-\$313,028
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment		\$1,356,369	\$50,236
Surplus Value from Redevelopment	Redev - Existing	-\$1,001,351	-\$37,087
% Return	Net Value/Existing Value	-42%	

Sources: County staff; Economic & Planning Systems

Table G-6 Estimated Feasibility of Redevelopment for Condominiums – East LA

Submarket:

East LA

Description	Factor Description	Amount	%
ASSUMPTIONS			
PROGRAM			
Land Area (Sq. Ft.)		36,300	
GBA (Sq. Ft.)		28,846	
<u>Market Rate</u>			
Studio		0	0%
1 BR		8	35%
2 BR		14	65%
3 BR		0	0%
Subtotal		22	100%
<u>Inclusionary</u>			
	20%		
Studio		0.0	0%
1 BR		1.9	35%
2 BR		3.5	65%
3 BR		0.0	0%
Subtotal		5.4	100%
Total Units		27	
<u>Parking Spaces</u>			
Surface		0	
Structured		44	
AFFORDABILITY			
<u>Sale Price @ 130% of AMI</u>			
Studio		\$358,000	
1 BR		\$409,000	
2 BR		\$460,000	
3 BR		\$511,000	
VALUE OF NEW UNITS		Total	per Unit
<u>Net Operating Income</u>			
Mkt Rate Sales	\$413,438 \$/unit	\$8,930,250	\$413,438
Affordable Sales	\$413,438 \$/unit (lesser of price at 135% AMI or market value)	\$2,232,563	\$413,438
Sales Revenue		\$11,162,813	\$413,438
Options	1.00% % gross revenues	\$111,628	\$4,134
- Cost of Sales/Marketing	5.00% % gross revenues	-\$558,141	-\$20,672
Total		\$10,716,300	\$396,900
REDEVELOPMENT COST		Total	per Unit
Direct			
Demolition	\$6,750 \$/existing unit	\$135,000	\$5,000
Site Improvement	\$10.00 \$/land sf	\$363,000	\$13,444
Vertical	\$135 \$/gba	\$3,894,188	\$144,229
Structured Parking	\$5,000 \$/space	\$0	\$0
Structured Parking	\$23,375 \$/space	\$1,028,500	\$38,093
Contractor Contingency	10.00% % of other direct costs	\$542,069	\$20,077
Subtotal		\$5,962,756	\$220,843
Indirect	41.75% % direct costs	\$2,489,451	\$92,202
Total		\$8,452,207	\$313,045
VALUE / FEASIBILITY METRICS		Total	Per Unit
Value of Existing Units	\$206,192 \$/unit	\$4,123,837	\$152,735
<u>Redevelopment Value</u>			
Total Sales Revenue		\$10,716,300	\$396,900
- Redevelopment Cost		-\$8,452,207	-\$313,045
- Cost of Affordable Unit Replacement	*Assumes none for initial feasibility testing	\$0	\$0
Net Proceeds from Redevelopment		\$2,264,093	\$83,855
Surplus Value from Redevelopment	Redev - Existing	-\$1,859,744	-\$68,879
% Return	Net Value/Existing Value	-45%	

Sources: County staff; Economic & Planning Systems



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MEMORANDUM

To: Ayala Scott and Connie Chung, Los Angeles County Department of Regional Planning

From: HR&A Advisors, Inc.

Date: April 22, 2020

Re: Los Angeles County Mobile Home Park Policy Study

HR&A Advisors, Inc. (“HR&A”) has completed an analysis of mobile home park land use policy on behalf of the Los Angeles County (the “County”) Department of Regional Planning (“DRP”). This memorandum includes a set of policy recommendations for near- and long-term consideration, based on best practices among California jurisdictions for the preservation of mobile home parks as naturally occurring affordable housing. The memorandum includes a review of current County objectives and initiatives for preservation and expansion of mobile home parks; background on mobile home parks as a land use in the County; relevant existing policies regulating mobile home parks in the County; analysis of the County mobile home park landscape, including zoning and location analyses; best practices and common regulatory provisions synthesized from jurisdictional outreach and comparative zoning code analysis; and finally, a set of policy recommendations for DRP’s near-term and long-term consideration. As a next step, DRP and County Counsel will translate near-term policy recommendations into zoning code text amendment language, and determine a path forward for longer-term policy recommendations.

Summary of Findings and Conclusions

The County’s current approach to regulating mobile home parks through the Zoning Code and General Plan lacks uniformity and does not explicitly facilitate the long-term preservation of mobile home parks. Currently the 86 mobile home parks in unincorporated areas are located within distinct zoning categories and land use designations, and many mobile home parks are legal nonconforming due to not adhering to the requirements of the underlying zone or land use designation. Research and outreach found that jurisdictions around the state have adopted land use policies that support the continued existence of mobile home parks as a land use. Notably, several jurisdictions have in recent years adopted special mobile home park zoning, as well as mobile home park closure requirements, to provide more control over the mobile home park conversion process.

Recognizing that specific General Plan or Zoning Code changes will be considered outside the timeline for the pending Affordable Housing Preservation Ordinance, HR&A recommends consideration of the following near-term changes, which are intended to mitigate negative consequences of the County’s current regulatory approach:

1. Exempt mobile home parks with valid Conditional Use Permits (“CUP”) from legal nonconforming status (i.e., use and density);
2. Consider a longer and standard term for mobile home park CUPs (e.g., 20 years);
3. Codify a list of mobile home parks by name and document their existing number of existing pad spaces per acre, inclusive of any vacant pad spaces and establish this ratio as the permitted density for each mobile home park; and
4. Align mobile home park closure requirements with statewide best practices.

Longer-term policy changes, which would bring the County’s policies and regulations in line with statewide best practices for mobile home park preservation, are also included in this report. The following approaches and policy changes are recommended for future consideration:

1. Incorporate analysis of environmental and human hazards into official decision-making criteria by prohibiting mobile home park expansions in areas not suitable for long-term residential use;
2. Adopt General Plan/Housing Element language explicitly stating the County’s mobile home park preservation goals, objectives and policies; and
3. Adopt a mobile home park overlay zone, a consistent mobile home park land use designation, and apply it to all existing mobile home parks in the unincorporated area.

Introduction

County Objectives for this Study

In February 2018, County Supervisors Sheila Kuehl and Mark Ridley-Thomas authored a motion that was approved by the Board of Supervisors (the “Board”) directing the implementation of an affordable housing action plan, which was completed in January of 2018.¹ The action plan calls for the development of policies to preserve, maintain, and update mobile home parks as naturally occurring affordable housing for extremely low-income households, veterans, senior citizens, and other households on fixed incomes.² The February 2018 motion called for a focus on affordable housing preservation and the completion of an Affordable Housing Preservation Ordinance. In particular, the Board directed DRP to “prepare an ordinance to preserve existing affordable housing units, both income-restricted as well as unsubsidized naturally occurring affordable housing that considers a variety of anti-displacement strategies, such as the regulation of condominium conversions and mobile home park closures, and one-for-one replacement of no net loss policies.”³

Separately, County staff are currently evaluating a mobile home park closure impact report process, including prerequisites for park closures, such as relocation assistance for park residents. The mobile home park policy study discussed in this memorandum is focused on land use tools to preserve mobile home parks, and modifications to how mobile home parks are addressed in the County Zoning Code and General Plan in accordance with best practices for preservation. It responds to DRP’s interest in a holistic review of existing land use regulations addressing mobile home parks, and the modification of provisions that are outdated, inconsistent with the County’s objectives, or cumbersome to enforce. It also responds to DRP’s interest in identifying and removing any Zoning Code barriers to mobile home park preservation and exploring a path forward for permitting and regulating mobile home park expansions.

Recent and Ongoing Mobile Home Park Initiatives in the County

This study complements three parallel County efforts to address mobile home park preservation and the protection of mobile home park residents in the unincorporated areas of the County:

- 1) A permanent Mobile Home Park Rent Stabilization Ordinance adopted in November 2019, limiting the maximum allowable annual space rent increase for mobile home park spaces, among other regulations, in unincorporated areas of the County;
- 2) Analysis by the County Chief Executive Office of potential mobile home park acquisitions, either for direct County purchase or for nonprofit entity purchase with financial assistance from the County, as part of an effort to prevent park conversions and improve habitability standards in mobile home parks; and
- 3) Evaluation of mobile home park closure procedures and relocation guidelines.

This study is intended to complement these parallel initiatives by ensuring that the County’s Zoning Code and General Plan facilitate protection of mobile home park residents and continued mobile home park operations as an affordable housing resource.

¹ Motion by Supervisors Sheila Kuehl and Mark Ridley-Thomas. February 20, 2018.

² Los Angeles County Affordable Housing Action Plan, January 2018.

³ February 20, 2018 Motion, *op. cit.*

Context

Mobile Home Parks in Unincorporated County Areas Today

As of October 2018, there were 86 mobile home parks with 8,503 mobile home park spaces in unincorporated areas of the County. As shown in Figure 1, mobile home parks are located throughout the County, but Supervisorial Districts 2 and 5 are home to significantly more mobile home parks and mobile home park spaces than the other Supervisorial Districts.

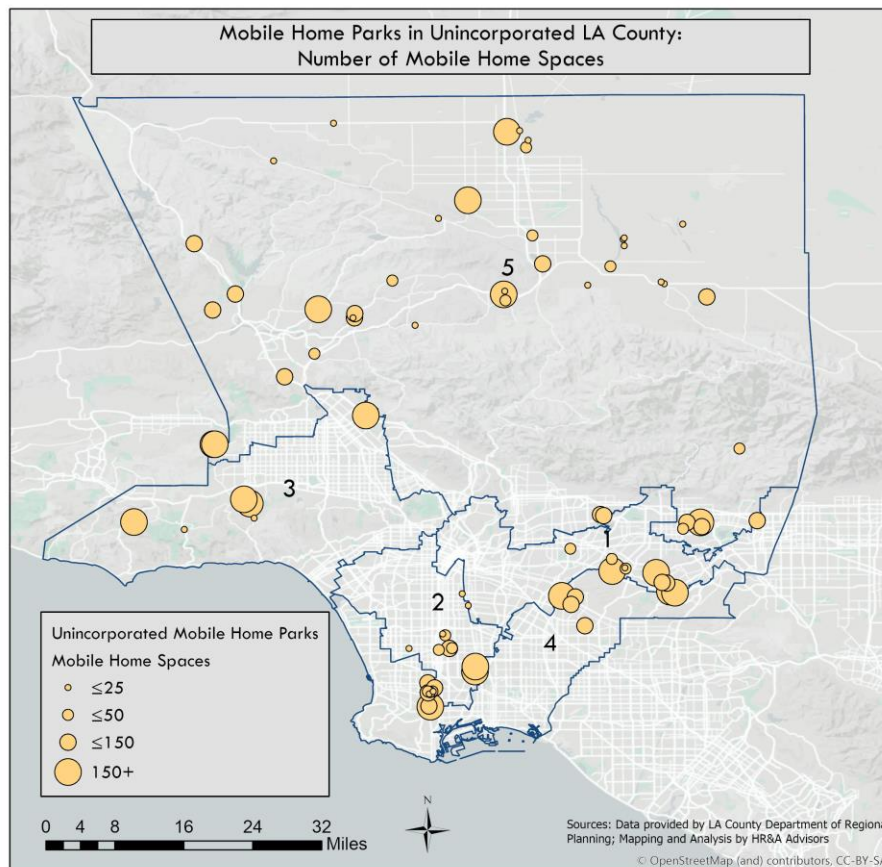
Figure 1: Inventory of Mobile Home Parks in Unincorporated LA County

Supervisorial District	Mobile Home Parks	Mobile Home Park Spaces	Percent of Total MHP Spaces
1	9	1,036	12%
2	22	2,274	27%
3	5	669	8%
4	7	1,381	16%
5	43	3,143	37%
Total	86	8,503	100%

Source: DRP, 2018

As illustrated in Figure 2, Supervisorial District 5 is home to 50 percent of the parks in unincorporated the County, and many of these parks are located in rural, low-density areas.

Figure 2: Mobile Home Parks in Unincorporated LA County



Source: DRP, HR&A Advisors

It is important to note that there is no one “typical” mobile home park in the County. In addition to ranging widely in location and surrounding neighborhood context, mobile home parks range in size from six spaces to over 500 spaces. A survey of mobile home park owners in the unincorporated areas of the County jointly administered by HR&A and the Department of Consumer and Business Affairs (“DCBA”) in 2018, found that these mobile home parks also range in ownership type, quality of infrastructure, amenities, and space rent. The 2018 survey also found that the average occupancy rate for the 21 responding mobile home parks was 99 percent, reflecting the demand for this affordable housing option in the County.⁴

Mobile home park residents in the County are different from conventional home residents on nearly every socio-demographic measure. Based on Public Use Microdata Samples (“PUMS”) from the U.S. Census Bureau to isolate the conditions of mobile home residents and households in the County, mobile home residents, on average, are substantially older, earn lower incomes, and have lower educational attainment levels than their conventional home counterparts. There is also a much higher rate of living alone, especially for residents over age 65. Mobile home residents are more likely to have a disability than conventional home residents, rely on government assistance at higher rates, and are less likely to have worked in the past twelve months than renters or owners of conventional homes.⁵

Background on Mobile Home Parks as a Land Use

Mobile homes were introduced in the United States in the 1930s as temporary housing, and thus the mobile home parks that accommodated them were considered temporary land uses. Subsequently, many mobile home parks were established or upgraded, and mobile home parks increased in popularity and prevalence as an affordable homeownership option through the 1980s.

Despite their popularity, public resistance rooted in perceptions about the design and quality of mobile homes as a housing type led to the widespread implementation of exclusionary zoning and other prohibitive regulations in jurisdictions across the U.S. While some jurisdictions, like the County, allowed mobile home parks to be developed across broad zoning categories, including in residential and agricultural zones, many jurisdictions pushed mobile home parks away from residentially-zoned neighborhoods by restricting mobile home parks to commercial or industrial zones only. The result today is that mobile home parks are commonly located in non-residential areas on the fringe of urbanized areas, including within industrial and agricultural zones.⁶ Moreover, as non-residential zones surrounding mobile home parks have further developed, some parks have become more notably incongruent with both the purpose and density of surrounding land uses.

Over the past several years, state and local governments have recognized manufactured housing as one part of the solution to a national shortage of affordable housing, and have begun to proactively discourage mobile home park conversions to other uses. Local government actions in California have included updating zoning and general plan provisions to explicitly prioritize the preservation of mobile home parks and the protection of mobile home park residents, and to discourage the redevelopment of mobile home parks. This has become a particularly notable trend in jurisdictions where mobile home parks now exist in more densely developed urban areas where it would be more profitable for the land to be redeveloped for other residential, commercial or industrial uses.

⁴ HR&A Advisors, Inc., “Los Angeles County Mobile Home Park Financial Characteristics & Considerations,” January 25, 2019, prepared for the Los Angeles County Development Authority.

⁵ HR&A Advisors, Inc., “Analysis of Mobile Home Resident and Household Characteristics in Los Angeles County,” November 21, 2018, prepared for the Los Angeles County Development Authority.

⁶ Pierce, Gabbe, Gonzalez. “Improperly-zoned, spatially-marginalized, and poorly-served? An analysis of mobile home parks in Los Angeles County,” UCLA Department of Urban Planning, 2018.

Mobile Home Park Supply and Closure Trends in California

As shown in Figure 3, as of 2011, there were 4,754 mobile home parks and 365,418 mobile home spaces in California. About 12 percent of the state’s mobile home parks were located in the County, and about two percent of the state’s mobile home parks were located in the unincorporated areas of the County.⁷

Figure 3: Supply of Mobile Home Parks: Statewide, County, and Unincorporated County (2011)

Area	Mobile Home Parks	Mobile Home Park Spaces
California	4,754	365,418
Los Angeles County	589	47,907
Unincorporated Los Angeles County	86	8,503

Source: Baar analysis of CA Housing & Community Development Department data

The overall supply of mobile home park spaces in California increased steadily during the 1960s and 1970s, but began to decline in the 1980s, and has continued to decline over the past 40 years. There has been essentially no new mobile home park development in the state since the 1990s, and mobile home park conversions have led to a loss of over 65,000 mobile home park spaces statewide since the peak supply in 1984.

Figure 4: Statewide Inventory of Mobile Home Parks and Spaces, 1961 to 2011

Year	Number of Parks	Number of Spaces
1961	3,961	148,662
1970	4,828	229,649
1975	6,401	369,626
1980	5,850	414,981
1984	5,812	432,066
1990	5,817	377,149
1996	5,698	372,647
2005	4,868	368,150
2011	4,754	365,148

Source: Baar HCD analysis of CA Housing & Community Development Department data

These statewide trends are also evident in the County. The County’s supply of mobile home park spaces declined about 10 percent between 1986 and 2011, 47,907 from 53,496.⁸ While historic inventory data for the unincorporated area of the County is not available from the California Department of Housing and Community Development (“HCD”) and DRP, historic park closure applications and permit approval records provide information on park closure trends in the unincorporated area. Per records provided to HR&A by DRP, there have been eight park closure applications and three park closures in unincorporated areas since 1993, as shown in Figure 5. A review of these park closure applications confirms that mobile home parks may not be the highest and best use of land in parts of the County, and that urban mobile home parks are at risk of redevelopment. The 2017 park closure application for the redevelopment of Live Oak Mobile Home Park in Arcadia into higher-density townhomes is a current example of a potential loss of mobile home park supply in the County.

⁷ Dr. Kenneth Baar, “The Economics of Mobilehome Ownership and Mobilehome Park Ownership in the City of Los Angeles and a Comparison of Local Regulations of Mobilehome Park Space Rents,” May 2011, prepared for the City of Los Angeles.

⁸ Baar, *op. cit.*

Figure 5: Filed Park Closure Actions for Mobile Home Parks in Unincorporated LA County, 1993-2018

Year	Request Action for Park Closure	County Actions
1993	Conversion of existing mobile home park to condominium ownership of mobile home spaces.	Approved.
1996	Conversion of existing mobile home park to condominium ownership of mobile home spaces.	Denied due to inactivity in 2006.
2004	Demolition of existing 44-unit mobile home park and construction of 46-unit condominium development.	Denied in 2016 due to inactivity.
2005	Conversion for an existing mobile home park to condominium ownership of mobile home spaces.	Meeting cancelled by proposer.
2010	Conversion of mobilehome park to industrial open storage lot.	Approved.
2010	Demolition of an existing mobile home park and construction of a joint multi-family-senior residential condo project.	Approved.
2013	Conversion for an existing mobile home park to condominium ownership of mobile home spaces.	Denied by Regional Planning Commission and Board of Supervisors in 2014 due to lack of majority resident support.
2017	Demolition and closure of an existing mobile home park and development of an 86-unit townhome development.	Closure report filed; case pending.

Source: DRP, HR&A

Construction of New Mobile Home Parks

Development of new mobile home parks in the state ended in the 1990s. HCD data confirmed that no new mobile home parks intended for permanent residential use were issued Permits to Operate (“PTO”) during at least the past 10 years, and HCD data on the year of construction for mobile home parks in the County indicate that the most recently constructed park in the County appears to one in Compton built in 1980. The lack of new mobile home park construction is a national trend, and one that is perhaps more dramatic in coastal areas of California, which have seen significant increases in land prices over the past 30 years.

The lack of new mobile home park development in the state suggests that future mobile home park development by a private developer in the County is highly unlikely. This is due to a number of economic feasibility issues: the cost of land, undesirability of available locations for development, barriers to connecting to municipal water and sewer and cost of using a well and private sewer; and finally, challenges securing loans for mobile home parks without a stabilized occupancy.

Existing Conditions: Zoning and Land Use Analysis

The following existing conditions analysis reviews the County’s current approach to land use regulations for mobile home parks. This regulatory analysis has implications for the preservation of mobile home parks in terms of legal status and the ability to expand, as well as potential redevelopment risk.

Mobile Home Park References in the Los Angeles County Zoning Code and General Plan

Under current zoning regulations that apply to unincorporated areas of the County,⁹ mobile home parks are permitted as a conditional use in all residential zones except the mixed-use zone, all agricultural zones, all rural zones, and most commercial zones.¹⁰ Mobile home parks are permitted through the discretionary issuance of Conditional Use Permits (“CUP”). A CUP is required for certain land uses which may need special conditions to ensure compatibility with surrounding land uses. To be approved, a CUP must be consistent with the existing adopted General Plan, including local area and community plans which contain the County’s policies regarding land use.

CUPs are subject to discretionary approval by either a Hearing Officer or the Regional Planning Commission. CUP decisions are made during public hearings, for which a case planner prepares a staff report and makes a recommendation to the Hearing Officer or Commission on the request in question. The Hearing Officer decision may be appealed to the Regional Planning Commission, and the Regional Planning Commission decision may be appealed to the Board of Supervisors. The Hearing Officer or Regional Planning Commission may impose additional conditions or regulations in approving a CUP.¹¹ There is currently not a standard term for mobile home park CUPs; parks may be granted a CUP term of 5, 15, or 20 years, for example.

The Zoning Code addresses mobile home parks in Los Angeles County Code, Title 22, Division 7, “Standards for Specific Uses: Mobile Home Parks.”¹² This code section outlines select regulations that apply to all mobile home parks, and notes that the Regional Planning Commission or a hearing officer granting a mobile home park’s CUP may impose additional standards, but the section’s baseline standards apply to all parks. The key standards are summarized in Figure 6 below.

⁹ Los Angeles County Code, Title 22, Division 3.

¹⁰ According to the Los Angeles County Zoning Code, mobile home parks are conditionally permitted the following residential, agricultural, and commercial zones: RA, R1, R2, R3, R4, R5, and RPD; A1 and A2; CH, C1, C2, C3, C4, CM, CR, and CPD. Add rural zones

¹¹ Los Angeles County Department of Regional Planning, “General Information – Zoning Permit Application Flowchart.”

¹² Los Angeles County Zoning Code, Section 22.140.370.

Figure 6: Existing Zoning Code Standards for Mobile Home Parks

	Mobile Home Park Conditional Use Standard
Density	The total number of lots within a mobile home park shall not exceed the number of dwelling units per net acre specified in the zone, ¹³ unless a density bonus is granted. In those zones or General Plan categories where residential densities have not been established, the density shall be established by the Commission or Hearing Officer.
Access and Circulation	Mobile home parks must have at least two access points to public streets.
Screenage and Signs	Mobile home parks must comply with a specified set of aesthetic standards regarding street frontage, screenage, and signs.
Local Park Space Regulations	Mobile home parks must provide recreational park space to residents or else pay an in-lieu fee as a residential subdivision.
Fire Protection	Mobile home parks must adhere to the Fire Code and comply with any recommendations of the Fire Department.
RV Park within a Mobile Home Park	Recreational vehicles within a mobile home park must be located in a separate, designated section of the park.
Lease Protections	In the case that rent stabilization is eliminated in the future, park owners must agree that all rental agreements have a statement recommending long-term leases for the protection of tenants against unexpected year-to-year rent increases.

Source: County Zoning Code Section 22.140.370

Mobile home parks are not explicitly referenced in the Los Angeles County General Plan or in the current certified Housing Element (2014-2021).

¹³ Zoning Code Section 22.140.370(B)(1) says that the number of lots within a mobile home park must comply with its zone, but according to DRP, density must comply with the mobile home park’s General Plan land use designation.

Legal Nonconforming Mobile Home Parks

Although they are a permitted use in certain zones as noted above, some mobile home parks in unincorporated areas are “legal nonconforming uses.” A legal nonconforming use is a use of land or structure which was legally established according to the applicable zoning and building laws at the time it was established, but which does not meet current zoning and building regulations. Mobile home parks may also be legally nonconforming for not adhering to any of the standards listed above in Figure 6, or for being located in a zone which today prohibits mobile home parks. DRP noted that a common cause of legal nonconforming mobile home parks in the unincorporated area is a failure to comply with the density requirement of the underlying land use designation.

Based on analysis of the actual density of mobile home parks in unincorporated areas and the allowable density, 49 of 86 parks (57% of parks) are legal nonconforming residential uses due to exceeding the allowable density of the underlying land use designation. These parks contain 3,952 of the unincorporated County’s 8,503 spaces (46% of spaces).

Mobile home parks that were developed pursuant to a CUP are generally permitted to continue and are allowed to expand or be modified pursuant to the terms and conditions of their CUP.¹⁴ However, because legal nonconforming status is generally intended to lead to the cessation of a particular use on a site, existing mobile home parks that are today legally nonconforming are subject to a number of unique regulatory obstacles to their continued use and expansion.

Existing Mobile Home Park Zoning and Density

Mobile home parks in unincorporated areas are located in 14 distinct zones. As shown in Figure 7, light and heavy agriculture are the most common zoning where mobile home parks are located, with 36 of the 86 parks in these agriculture zones. Residential-zoned parks represent 22 out of the 86 parks, and the remaining parks are distributed across manufacturing and other commercial zones. There are 10 mobile home parks located in industrial zones, including Light Manufacturing and Heavy Manufacturing, in which mobile home parks are prohibited uses. These mobile home parks are legally nonconforming due to use.

¹⁴ Los Angeles County Zoning Code Section 17.05.020

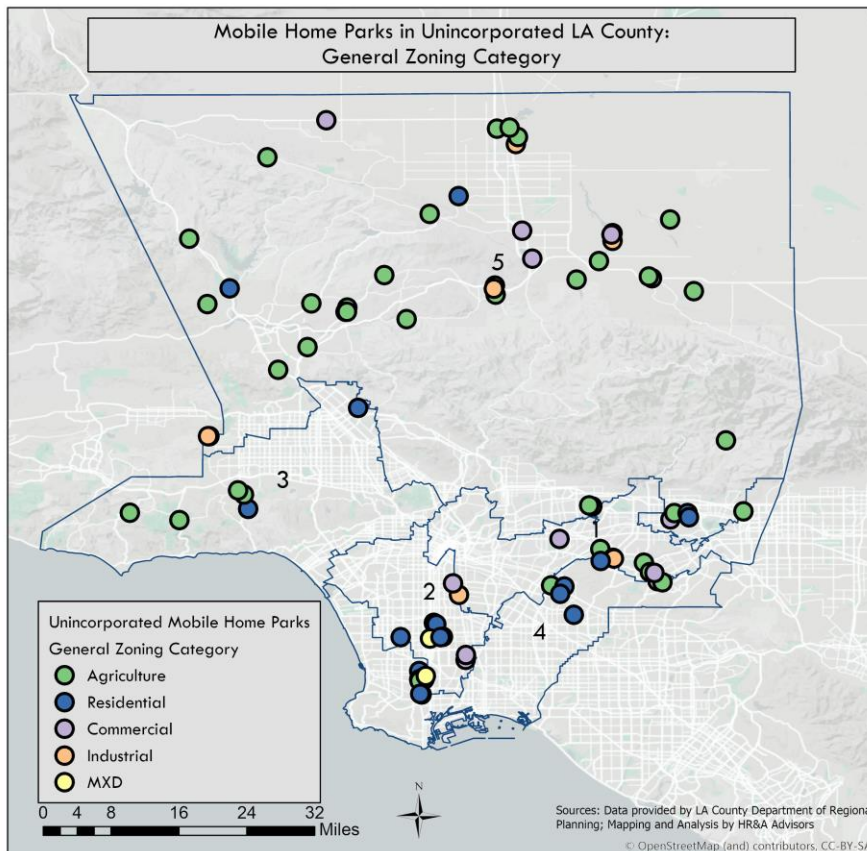
Figure 7: Mobile Home Parks and Mobile Home Park Spaces by Zoning Category

Zoning Code Land Uses	MHP Count	Spaces Count
Light Agriculture	20	2,193
Heavy Agriculture	16	871
Limited Density Residential	10	1,373
Light Manufacturing	8	533
Single Family Residential	6	577
Rural Commercial	5	137
General Commercial	4	417
Two Family Residential	4	351
Commercial Manufacturing	3	1,141
Neighborhood Commercial	2	24
Heavy Manufacturing	2	39
Mixed Use Development	2	82
Residential Agricultural	2	61
Resort and Recreation	2	233

Source: LA County Code Title 22; LA County Department of Regional Planning; HR&A Advisors

As shown in Figure 8, many of the mobile home parks in Supervisorial District 5 and Supervisorial District 3 are agriculturally-zoned. Supervisorial Districts 2, 3, and 4 include a range of zoning categories for mobile home parks, including many of the County’s industrial and commercial-zoned mobile home parks.

Figure 8: Map of Mobile Home Parks by General Zoning Category



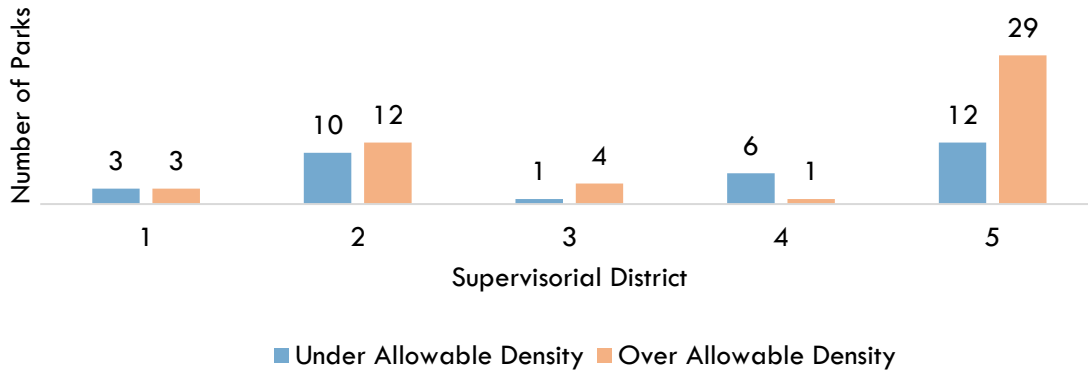
Source: DRP, HR&A

In addition to a Zoning Code zone category for the property on which they are located, each mobile home park location is also associated with a specific General Plan land use designation with a maximum allowable density standard for that designation. For example, the Lancaster Park in Supervisorial District 5 is zoned “A-2” or “Heavy Agriculture” and has a General Plan land use designation of “RL20” or Rural Land 20, which stipulates that the maximum permitted density on the site is 0.2 mobile home park pad spaces per acre. The land use categories generally correspond to the purpose of the zone; some agriculture-zoned mobile home parks represent an exception to this rule, however, as some agriculture-zoned mobile home parks have a residential land use designation.

Based on their General Plan land use designations, mobile home parks are located on land that varies in allowable density from 0 to 70 units per acre. The existing mobile home parks in unincorporated areas range in actual density from 1 to 41 spaces per acre, with an average density of 15.8 spaces/acre.

Measured in terms of pad spaces per acre, 49 mobile home parks (57%) exceed the maximum allowable density in their respective zones and 32 parks (43%) are in compliance with the allowable densities.¹⁵ As shown in Figure 9, mobile home parks that are legally nonconforming due to higher-than-allowable density are primarily located in Supervisorial District 5, but legally nonconforming parks due to density exist throughout the County.

Figure 9: Mobile Home Park Compliance with Zoning Density Regulations by Supervisorial District



Source: DRP; HR&A Advisors

As shown in Figure 10, mobile home parks that exceed their allowable density are most commonly in agricultural zones, while parks with underutilized density are most commonly in residential zones. The 15 residential-zoned parks with underutilized density are notable for their relative redevelopment risk, as the zoning and General Plan land use designation are aligned with uses likely to be more valuable for another form of development.

¹⁵ This density analysis excludes five parks for which density data was inconclusive due to the sites being subject to two separate land use designations.

Figure 10: Mobile Home Park Density Conformity by Zone

Parks Over Allowable Density		Parks Under Allowable Density	
Zone	# of Parks	Zone	# of Parks
Agricultural	25	Residential	15
Industrial	9	Agricultural	9
Commercial	7	Commercial	6
Residential	7	Industrial	1
Other (MXD)	1	Other (MXD)	1
Total	49	Total	32

Source: DRP; HR&A Advisors; Supplemented with data from [Z-Net](#)

Implications of Zoning and Density Analysis

The County Zoning Code’s approach to density regulation is problematic for two reasons. For mobile home parks that exceed their land use designation’s allowable density, but are otherwise in compliance with all County standards for mobile home parks, the legal nonconforming status of these parks may be unduly prohibitive, most notably by preventing the ability of these parks to expand. With many legal nonconforming parks due to density located in Supervisorial District 5, the County’s current low-density land use designations for certain mobile home parks may limit the expansion opportunity.

As importantly, parks with a significant gap between existing and allowable density may be at higher risk for closure and redevelopment.¹⁶ It is important to note that underutilized density is rarely used by mobile home park owners to expand a park through “infill” development, due to the infeasibility of reconfiguring park pad spaces, infrastructure and utilities, and associated costs. Mobile home park expansions, while rare in recent decades, generally occur through the purchase of adjacent or nearby land, with the original mobile home park site unchanged. Most of the mobile home parks that have applied for closure over the past few decades have sought to redevelop parks into higher-density condominiums or townhomes. Mobile home parks in more urban and suburban areas of the County that are zoned residential and which have underutilized density may be at-risk for redevelopment in the future.

¹⁶ It is important to note the difference between underutilized density and park vacancy. While typical occupancy for mobile home parks in the County is exceedingly high, some parks have come to the County’s attention due to high vacancy. High vacancy parks represent an opportunity to increase occupancy by attracting new tenants to empty mobile home park spaces. Some of these parks were identified in response to the CEO interest in mobile home park acquisition as opportunities to provide affordable housing by improving habitability and attracting new tenants. The ability to increase the number of pad spaces in a mobile home park is a function of the allowable density.

Existing Conditions: Spatial Analysis

In addition to land use standards, the County’s consideration of whether to modify regulations for new or expanded mobile home parks should also consider any hazards where mobile home parks are located. The following existing conditions analysis examines the location of mobile home parks relative to known environmental and human hazards. This spatial analysis has implications for the County’s policy decisions to allow for the expansion and the long-term preservation of mobile home parks, and spatial characteristics of parks which may require additional protection or consideration due to hazard level.

Fire Hazard Zones

As shown in Figure 11, about one third of mobile home parks (29 parks) are in Fire Hazard Severity Zones (“FHSZ”), which are zones that denote a degree of vulnerability to fire. FHSZ designations are separated into three classes: moderate, high, and very high. All but two of the parks located in an FHSZ are in the most severe class.

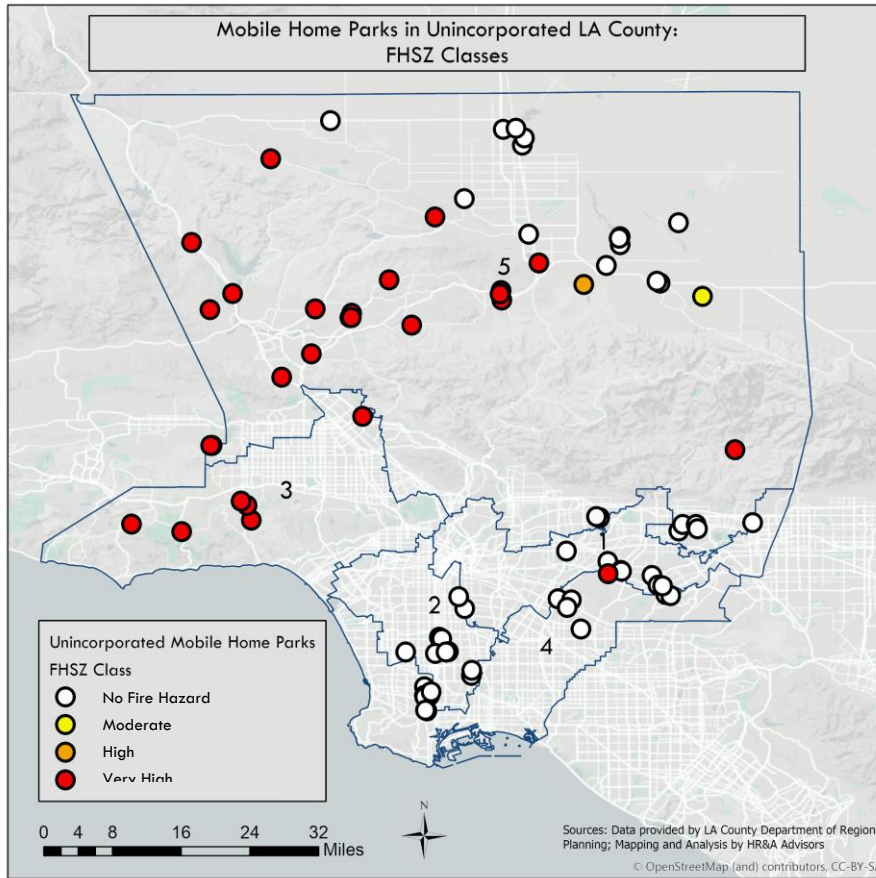
Figure 11: Mobile Home Parks in Fire Hazard Zones

	Number of Parks	Number of Spaces
No FHSZ	57	5,479
Moderate	1	87
High	1	20
Very High	27	2,917

Source: DRP; HR&A Advisors

Almost all mobile home parks in fire hazard severity zones are located in Supervisorial Districts 3 and 5, in the Santa Monica Mountains and north of Santa Clarita. As shown in Figure 12, mobile home parks in the more developed, urban areas of the County are outside of fire hazard severity zones.

Figure 12: Fire Hazard Severity Zones: None, Moderate, High, and Very High



Source: DRP, HR&A

County General Plan Environmental Hazard Classifications

The County General Plan utilizes a broader constraint classification that includes FHSZ, but also incorporates other environmental hazards (e.g., floodzones and active fault traces) and sensitive land uses. The County General Plan classification ranges in severity from Class 1 (least restrictive) to Class 3 (most restrictive). In the County’s categorization, an FHSZ designation of ‘Very High’ is considered a Class 1 constraint, or a Class 2 constraint when combined with a 50 percent slope.¹⁷

Figure 13 parses mobile home parks within fire hazard zones from the other mobile home parks in the County, which all represent a Class 1 constraint, from the parks outside of fire hazard zones. As shown in Figure 13, of the 57 mobile home parks outside of fire hazard zones, only 16 of them also fall outside of the County’s human hazard or sensitive land use classification. However, most mobile home parks receiving an environmental hazard classification receive a Class 1 classification, and only four mobile home parks receive a Class 3 classification.

¹⁷ This analysis does not differentiate between mobile home parks that are classified based on a hazard or a constraint, because the County’s classification system does not specify the nature of the constraint by site. For example, a park could fall into a Class 2 constraint category because it is along a scenic highway or because it is in a landslide zone.

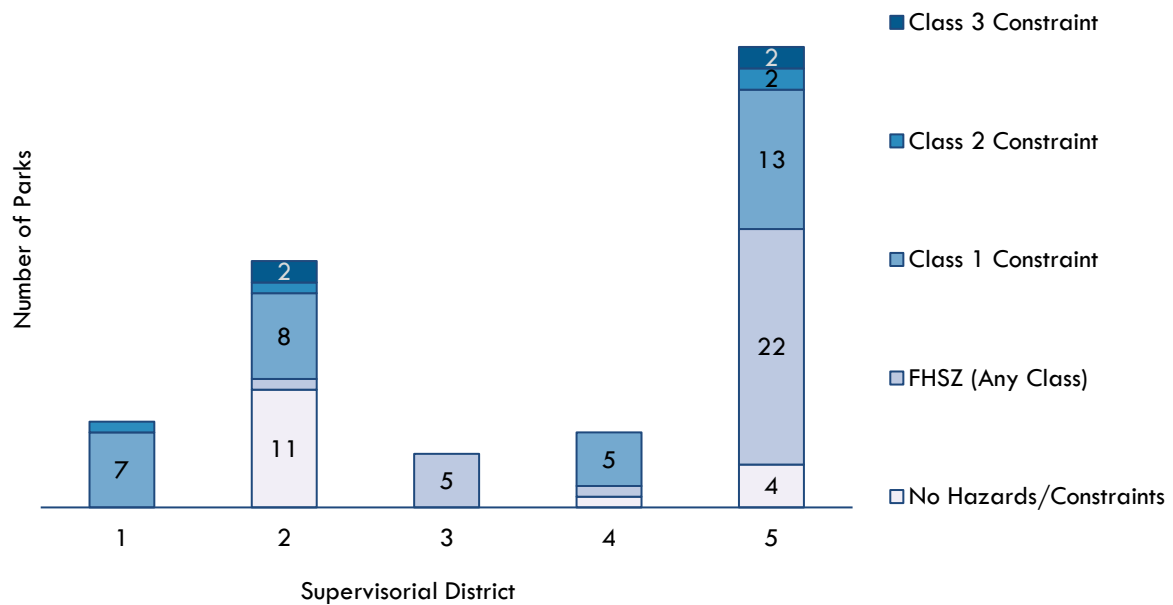
Figure 13: Parks and Spaces by Constraint Classification

Hazard/Constraint Classification	Number of Parks	Number of Spaces
No Hazards/Constraints	16	911
FHSZ (Any Class)	29	3,024
Class 1 (Excluding FHSZ parks)	33	2,656
Class 2 (Excluding FHSZ parks)	4	1,067
Class 3	4	845

Source: DRP; HR&A Advisors
 Supplemented with data from California Department of Conservation [Regulatory Maps](#)

As shown in Figure 14, Supervisorial District 2 has the highest proportion of mobile home parks that do not fall within a fire hazard zone or a General Plan constraint category. Supervisorial District 5 represents the greatest level of hazard and constraints, with all but four of its 43 parks falling within a fire hazard zone or General Plan constraint category.

Figure 14: General Plan Hazards/Constraints by Supervisorial District:



Source: DRP; HR&A Advisors
 Supplemented with data from California Department of Conservation [Regulatory Maps](#)

Environmental Justice Screening

In addition to the County’s General Plan land use classification categories, an Environmental Justice Screening Method (“EJSM”) was used to measure mobile home park environmental vulnerability. The EJSM was developed to support the Green Zones Program in partnership with the University of Southern California, Program for Environmental and Regional Equity and Occidental College. EJSM illustrates cumulative risks associated with environmental justice within the County by identifying areas that are disproportionately

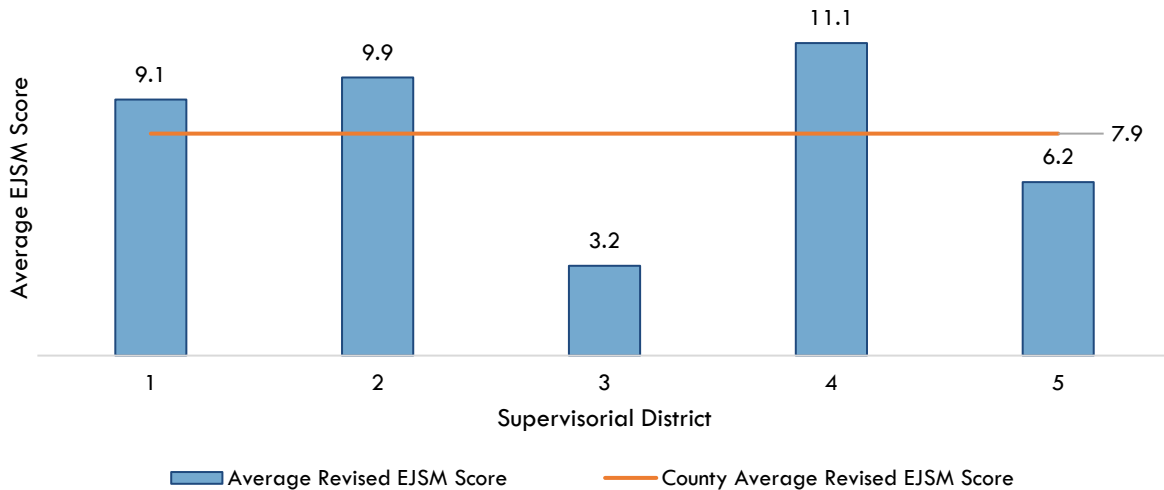
burdened by and vulnerable to multiple types of pollution and health risks.¹⁸ In contrast to the FHSZ and County General Plan Constraints, the EJSM scores account for human hazards, such as air pollution.

The EJSM is a standardized scoring system to analyze the unequal distribution of environmental hazards and their disproportionate impact on low-income communities, communities of color, and communities with fewer years of formal education. In consultation with DRP, HR&A revised the EJSM scoring method into a “Revised EJSM,” to exclude population data and focus on the spatial data.¹⁹

The revised EJSM scores include proximity to sensitive land uses and climate change vulnerability, including cumulative pollution impacts. These revised EJSM Scores range from 3 to 15, where 3 is the lowest degree of environmental vulnerability and 15 is the highest degree of environmental vulnerability.

As shown in Figure 15, the average revised EJSM score for mobile home parks in the County is 7.9, or a moderate degree of environmental vulnerability.

Figure 15: Average Revised EJSM Scores for Mobile Home Park Locations by Supervisorial District



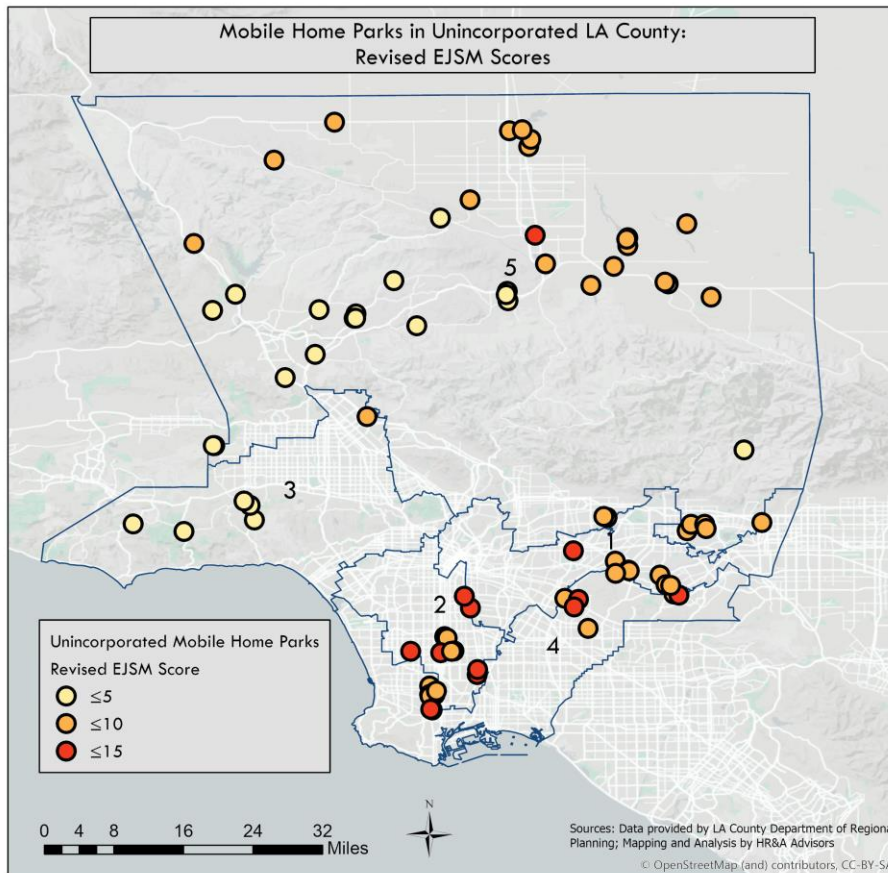
Source: DRP; HR&A Advisors
Supplemented with data from LA County [Green Zones Program](#)

Parks in Supervisorial Districts 2 and 4 had the highest revised EJSJ scores, while parks in districts 3 and 5 had relatively lower EJSJ scores. As shown in Figure 16, nearly all mobile home parks in Supervisorial Districts 1, 2, and 4 have a revised EJSJ score of 10 or higher.

¹⁸ Los Angeles County Department of Regional Planning Green Zones Program

¹⁹ More information on HR&A’s “Revised EJSJ” methodology is included in Appendix 1.

Figure 16: Mobile Home Parks and Revised EJSM Scores



Source: DRP Green Zones Analysis, HR&A Advisors

Implications of Spatial Analysis

Most mobile home parks in the County are exposed to environmental or human hazards. Parks in the rural parts of the County more exposed to fire hazards, while many urban parks are exposed to human hazards. A mobile home park’s level of exposure to environmental and human hazards, and the site’s suitability for ongoing residential use, should be considered when determining a park’s application for expansion. As the County pursues more permanent preservation measures for mobile home parks, the near-, medium-, and long-term threats posed by various hazards to mobile home parks should be further studied as the County plans for the future of its mobile home parks. While both the environmental and human hazards explored in this report pose health threats to residents in these areas, environmental hazards, such as fire hazards, pose a more near-term and extreme threat: for example, 110 homes in the Seminole Springs Mobile Home Park in Supervisorial District 2 were destroyed during the 2018 Woolsey Fire; this park is located in a “Very High” FHSZ.

It should also be noted that a mobile home park’s legal nonconforming status may prevent it from receiving regulatory coverage under new ordinances. For example, under the County’s forthcoming Green Zones ordinance, unincorporated communities with a high concentration of residential and industrial uses in close proximity to each other will be designated as Green Zone Districts. In the Green Zone Districts, residential uses will be subject to additional protections: some industrial uses will be prohibited within 500 feet of a residential use, become discretionary, or require other mitigations. There are 28 mobile home parks within Green Zone Districts; however, mitigations are not required to protect nonconforming residential uses, and therefore, eight mobile home parks will be precluded from receiving protections.

Best Practices: Research & Outreach

In order to understand comparative approaches to zoning-related regulation and preservation of mobile home parks, HR&A conducted outreach to relevant California jurisdictions and mobile home park advocacy organizations.²⁰ HR&A identified jurisdictions with a large number of mobile home parks, recent changes to mobile home park land use regulations, and code elements of potential interest in the County. In addition to discussions with these jurisdiction, HR&A conducted in-depth reviews of selected zoning codes.

The following questions guided the outreach process:

- What policies do other jurisdictions have in place to preserve mobile home parks?
- Why do some jurisdictions have special zones or designations while others do not, and what are the implications?
- Besides special zoning and park closure ordinances, are there other preservation land use tools used by jurisdictions?
- How do other jurisdictions address mobile home park density regulations?
- Are there California jurisdictions allowing or actively facilitating the expansion of existing mobile home parks?
- Have other jurisdictions adopted varied approaches to preservation policies by location within the jurisdiction?
- How have other jurisdictions addressed legal nonconforming parks?

Key Outreach Findings

Approaches to Mobile Home Park Land Use Policy

There are three general approaches that jurisdictions in California take when regulating mobile home parks as a land use:

- 1) **Special Zones:** Some jurisdictions have specific zoning and/or land use designations for mobile home parks, and these jurisdictions generally do not require parks to have CUPs;
- 2) **Varied Zones, Consistent Land Use Designations:** Some jurisdictions have varied zoning for mobile home parks, but have consistent General Plan land use designations that are compatible with mobile home parks (e.g., Medium-High Density Residential);
- 3) **Varied Zones and Land Use Designations:** Some jurisdictions, like the County, have both varied zoning and varied land use designations for mobile home parks.

This last group of jurisdictions, of which the County is a part, is common and generally has the least prescriptive and uniform land use regulations for mobile home parks. These jurisdictions may specify the zones in which mobile home parks are permitted as a by-right or conditional use, but the underlying zones and land use designations of parks are often inconsistent with a mobile home park use. The underlying zone and land use designations vary, but still has bearing on the legal status of parks based on its allowed density and land uses, to which a mobile home park may not conform. These jurisdictions commonly have a large portion of legal nonconforming parks due to both use and density discrepancies, and CUPs may provide relief from the prevailing regulations to allow parks to continue operating.

²⁰ A complete list of organizations contacted by HR&A is included in Appendix 3.

Policy Tools to Preserve Mobile Home Parks

This research and outreach yielded four policies that together represent the “toolbox” for the preservation of mobile home parks. The first two of these, rent stabilization and mobile home park closure, are already adopted and/or being evaluated by the County. Special mobile home park zoning and subdivision regulations have not yet been considered.

Figure 17: Mobile Home Park Preservation Policies

	Description	Adopted/Under Consideration by LA County
Rent Stabilization	Limits annual rent increases for mobile home park spaces and offer other protections for mobile home park tenants	✓
Closure Requirements	Places conditions on the closure of a mobile home park, including relocation assistance for residents	✓
Special Zoning	Zoning that makes mobile home parks the sole allowable by-right use for a particular parcel or area creates extra protection against the conversion or closure of mobile home parks to other uses. Overlay Zones are sometimes used for this purpose.	
Subdivision Regulations	Regulates the conversion of mobile home parks to cooperative/condominium ownership, expediting the subdivision process when the majority of residents are in favor	

Mobile Home Park Overlay Zones²¹

The most prevalent land use policy to preserve mobile home parks is the introduction of an “overlay zone.” Overlay zoning is a regulatory tool that creates a special zoning district, mapped over an existing base zone(s), which identifies special provisions in addition to those in the underlying base zone. The overlay district can share common boundaries with the base zone or cut across base zone boundaries. Regulations or incentives are attached to the overlay district to protect a specific resource or guide development within a special area.

In recent years, jurisdictions around the state that are explicitly interested in the preservation of mobile home parks have updated their zoning codes to add a mobile home park overlay zone. This typically occurs in jurisdictions that also have a mobile home park closure ordinance, such that the overlay zone provide one

²¹ In the course of developing this report, County staff noted that any General Plan text or map amendments will not be considered in the near-term, but may be the subject of continued study. Because overlay zones emerged as a best practice for the preservation of mobile home parks through the jurisdictional outreach conducted for this report, discussion about mobile home park overlay zones, which would require General Pan text and map amendments, is included for the County’s future consideration.

additional procedural discretionary step that mobile home park owners must take to redevelop a park; namely removal of the overlay on the property in question.

Regulatory Authority

Jurisdictions noted that they have strengthened mobile home park protections, including through special zones, in response to State guidance to preserve affordable housing (Government Code 65583 c4). Stand-alone zoning for mobile home parks that make parks the sole allowable by-right use for a particular parcel or area is considered a best practice protection against the conversion or closure of parks. Jurisdictions cite regulatory authority in the Mobilehome Parks Act (Health & Safety Code Section 18300(g)).

Prevalence

A number of jurisdictions across the state have in recent years moved to adopt mobile home park overlay zones, or to create an underlying mobile home park zone. Jurisdictions with special zones include Ventura County, San Mateo County, County of Santa Cruz, City of Hayward, City of Riverside, Newport Beach, National City, City of Lancaster, Huntington Beach, and Hermosa Beach. The City of San Jose is currently exploring an overlay zone for mobile home parks.

Purpose

The purpose for the establishment of these zones in other jurisdictions is generally to preserve mobile home parks, but also to allow the jurisdiction to distinguish between locations where mobile home parks should be established, maintained, and protected, and locations where residential parks may not be the most appropriate land use. Overlay zones are much easier to implement if they are providing the means necessary to implementing the General Plan – i.e., if the General Plan has language about the preservation of mobile home parks and/or naturally occurring affordable housing.

Applicability

Most jurisdictions with special zones apply the zone to every mobile home park in the jurisdiction. This is in part due to potential legal issues around spot zoning. However, there have been jurisdictions that exclude certain parks from the special zone, for various reasons, and that only apply the overlay zone to parks with underlying residential zoning.

For example, in Huntington Beach, in considering whether the zone is appropriate for any particular property, that city considered:

- Existing zoning and General Plan designations;
- The age and condition of the park, with preservation preference for parks in good condition;
- The relationship of the mobile home park to surrounding land uses, with preservation preference for parks adjacent to non-harmful uses;
- Vehicle access to the area under consideration;
- Site area; and
- Site configuration

Permitted Uses

Zones usually include mobile home parks and accessory uses and structures incidental to the operation of mobile home parks, such as recreation facilities and community centers, public or private storage facilities. Some mobile home park zones also allow other types of affordable housing in that zone.

Effectiveness

We have not heard or seen hard evidence that the mobile home park overlay zone is the factor that stopped a particular park from being redeveloped, but jurisdictions that have gone through this process believe that it is one additional step and aspect of control over parks.

Removal

Some jurisdictions (Hermosa Beach, Huntington Beach, National City, Newport Beach) include provisions for the removal of the overlay, which relates back to closure ordinances and adherence to the General Plan.

Relationship to permits

Mobile home parks inside a special zone are generally subject to site plan review, but not a CUP. Parks located outside the zones and otherwise permitted are subject to a CUP, but still need to comply with the development requirements which would be imposed in the surrounding zone, including density. This could result in mobile home parks that are not included in the zone remaining legal nonconforming due to density; however, by nature of excluding a park from an overlay zone, the park is likely not a candidate for permanent residential use and therefore the nonconforming status is appropriate.

Compliance

Many jurisdictions with mobile home park zones also have mobile home park rent stabilization. These jurisdictions said that they rely on reporting and code compliance for rent stabilization, with all of their compliance records in the same database that tracks rent stabilization ordinance compliance. For example, mobile home parks under rent stabilization are generally required to self-report rents for each pad space and turnover in park residency annually, tracked in a database by the jurisdiction's code enforcement department; should the overlay district include density standards, the mandatory reporting done for rent stabilization could include verification that the park is maintaining an allowable density. This reporting could also be used to track mobile home park vacancies, which is currently not data that is collected.

CEQA: MHP overlay zones are exempt from CEQA review, per the CEQA Guidelines (CA Code of Regulations, Sec. 15061(b)(3)) that exempt actions to maintain existing uses.

Park Development and Expansion

As noted previously, the number of parks in the State and in the County has continuously declined over the past three decades and the most recently constructed park in the County was built in 1980. The jurisdictions contacted during this outreach each noted that they had not seen the development of a new mobile home park since the 1990s. Only one jurisdiction, the County of Santa Cruz, had seen a mobile home park expansion in the past ten years. This expansion was a resident-owned park that sought an expansion at the time of resident purchase. While anecdotal, the interviews suggest that the expansion of mobile home parks in the County is unlikely to be a frequent occurrence in the future.

Park Development Standards

Despite the lack of new mobile home park construction, it is not uncommon for jurisdictions' zoning codes to include development standards and site plan review processes for mobile home parks and manufactured housing relative to wood frame housing construction. These development standards typically include subsections such as minimum lot area, access and street standards, infrastructure and utility standards, and sometimes aesthetic standards (e.g., addressing walls, fences, and landscaping). For jurisdictions with a single prescribed density that applies to all mobile home parks, these regulations are often included within this longer set of park development and design standards.

The standards are intended to apply to new mobile home parks, park expansion, and rebuilding parks, but sometimes note explicitly that they are not intended to impact the legal status of parks that existed at the time development standards were adopted. For example, the City of Lancaster has a set of development standards for mobile home parks in the zoning code, but includes the following language exempting existing parks from the standards: “It shall not be the intent of this chapter to render previously legally created MHPs which do not comply with new mobile home park zone requirements of this chapter to be nonconforming where these parks complied with the ordinances in effect at the time of their creation.”²²

It should be noted that because state law also governs development standards for mobile home parks, these standards are often duplicative, and mobile home park preservation advocates view them as an undue burden.

Density

While many jurisdictions interviewed are challenged by mobile home park density compliance, like the County, the most common approach to regulating density is through the general plan land use designation, the same approach the County currently uses. However, most jurisdictions interviewed, and particularly those with recently updated mobile home park land use designations or zoning, apply consistent residential general plan land use designations which have density allowances that are compatible with the existing densities of mobile home parks (e.g., all mobile home parks are Medium Density or Medium-High Density Residential).

Other jurisdictions set one density for all mobile home parks, or two densities that are set according to whether a park is in a relatively urban or rural location: for example, a density of 18 units per acre for all mobile home parks in urban areas, and 8 units per acre for all mobile home parks in rural areas.

Another common approach to setting density is to defer to the density of the underlying zone. One unique modification to this approach is to allow the option for a mobile home park density bonus (e.g., up to 135% of zone density).

Figure 18 shows a selection of jurisdictions representing the range of approaches to regulating mobile home park density.

²² City of Lancaster Code of Ordinance Title 17 -.08 Article VIII section 350 “Purpose and Intent”

Figure 18: Comparative Approaches to Regulating MHP Density

	Set Specific Density for MHPs	Defer to Zoning Category	Defer to General Plan Land Use Designation	Notes
Ventura County		✓		Often when jurisdictions adopt overlay zones, they adjust the general plan land use designations to be consistent for all mobile home parks; however, Ventura County continued to defer to the underlying zone
Riverside County		✓		Allows a density bonus of 25 percent if it is determined that the higher density is compatible with the area in which the development is proposed to be located
San Luis Obispo County	✓		✓	Set density of 8 du/acre in urban or village areas, defers to the land use designation in rural areas
San Mateo County			✓	All mobile home parks are designated Medium or Medium-high Density Residential based on the density of the surrounding uses
Santa Cruz County			✓	Determined by dividing the net developable area in square feet by the site area per dwelling required for the zone district in which the development is located.
City of Lancaster		✓	✓	Medium Density Residential for parks inside the overlay zone, defers to underlying zone density for parks outside the overlay zone
City of Palmdale			✓	
City of San Jose			✓	Range from Medium to High Density Residential land use designations
City of Palm Springs	✓			Set minimum space of 5,000 square feet per mobile home park space

Legal Nonconforming Mobile Home Parks

Most jurisdictions interviewed by HR&A noted that they also have legal nonconforming mobile home parks and that they have not taken actions to address or reverse the status of these parks, though some have plans to bring parks into compliance in the future. For example, Palm Springs staff noted that they have nonconforming parks due to density and they plan to eventually amend the General Plan and then the zoning code to increase the density and bring parks back into conformity.

On the most permissive end of the spectrum, some jurisdictions have zoning provisions in which they exempt mobile home parks from the restrictions placed on other nonconforming uses. The City of San Clemente's code, in addressing nonconforming structures and uses, notes that certain land uses are exempt from the code chapter, including mobile home parks:

The following land uses are exempt from this chapter: Mobilehome Parks in compliance with any applicable Conditional Use Permit shall be exempt from all provisions of Chapter 17.72 [Nonconforming Structures and Uses].²³

The City of Lancaster's senior mobile home park district overlay zone creates an exemption for legal nonconforming senior mobile home parks:

Exemption from Abatement of Nonconforming Uses. Notwithstanding the provisions of Article VII of Chapter 17.32 of the Lancaster Municipal Code, senior mobilehome parks that have become nonconforming as to the underlying general plan or zoning designation shall be deemed to be legal and conforming uses.²⁴

On the other end of the spectrum the most restrictive jurisdictions interviewed set a termination period for nonconforming parks that do not have conditional use permits, but generally allow property owners to apply for extensions with the approval of a conditional use permit.

Subdivision Regulations

As noted previously, some jurisdictions have policies addressing conversion of existing mobile home parks to mobile home park cooperative or condominium ownership, typically within a Mobile Home Park Conversion Ordinance. The subdivision of mobile home parks to convert to resident ownership is an increasingly common phenomenon, and one which is supported by advocates as a wealth-building, tenant rights, and mobile home park preservation measure. However, while some conversions may be initiated by residents as a means of preserving the park from sale or closure, others are initiated by the owner against wishes of a majority of residents in order to prepare for park redevelopment. Senate Bill 510, passed in 2013, makes clear that local governments have the authority to block such conversions where they are opposed by a park's residents, and jurisdictions around the state have added subdivision ordinance language to this effect.²⁵

Some cities have added clauses in conversion ordinances that note that a subdivision may be approved on an expedited basis and be exempt from the typical local conversion requirements if it is found in the writing of a petition that a majority of the mobile home park residents are in favor of the conversion.²⁶ While these

²³ City of San Clemente Zoning Code Section 17.72.030 "Applicability"

²⁴ City of Lancaster Zoning Code Section 17.08.470 "Senior Mobilehome Park"

²⁵ "Housing Element Policy Best Practices," February 2014. Housing Leadership Council of San Mateo County, Association of Bay Area Governments.

²⁶ See Appendix 4 for sample language in the Half Moon Bay Mobile Home Park Conversion Ordinance.

parks are still required to file an impact report for resident ownership conversion under State Law, the jurisdiction may exempt these parks from a mandatory waiting period (e.g., of 12 months) for park closure or conversion to which it may subject other parks closures that result in residential displacement.

Conditional Use Permit Procedures

Jurisdictions without special mobile home park zones, like the County, also permit parks through CUPs. Like the County, interviewed jurisdictions noted inconsistencies with CUP compliance and CUP terms among mobile home parks in their jurisdictions: there are mobile home parks operating with expired CUPs, as well as parks that never obtained a CUP due to predating the requirement. Most jurisdictions with overlay zones eliminate mobile home park CUPs for parks located inside of the mobile home park overlay zone; parks outside of the zone are still only permitted with a CUP. However, in the case of Ventura County, mobile home parks inside of the overlay zone are still subject to their formerly-granted CUPs, and that County's one mobile home park without a valid CUP was not required to obtain a CUP to become part of the overlay zone.

Policy Recommendations

Recognizing that specific General Plan or Zoning Code changes will be considered outside the timeline for the pending Affordable Housing Preservation Ordinance, HR&A recommends consideration of the following near-term and longer-term changes, which are intended to mitigate negative consequences of the County's current regulatory approach, which would bring the County's policies in line with statewide best practices for mobile home park preservation.

As a next step, all recommended code changes and policies addressing mobile home park regulations should be reviewed with County Counsel.

Policy Changes for Near-Term Consideration

1. Exempt Mobile Home Parks with valid CUPs from Legal Nonconforming Status: The current County mobile home park standards render 57 percent of mobile home parks in unincorporated areas legal nonconforming due to exceeding the density of the General Plan land use designation. The legal nonconforming status of these parks communicates that they are an expiring land use, and on a practical level, may penalize or limit the operation and expansion of parks in a number of ways. The County should consider exempting all mobile home parks with CUPs in good standing from legal nonconforming status, mirroring the City of San Clemente code language: "mobile home parks in compliance with any applicable CUP will be exempt from legal nonconforming provisions." This change could be located either within the Legal Nonconforming Use section or the Mobile Home Park Standards section of the Zoning Code. By exempting only parks with an existing CUP for which the park is in compliance with the CUP conditions, the County will encourage parks to come into compliance in order to win relief from non-conformance limitations. Parks with expired CUPs should be required to obtain a discretionary CUP extension or a new CUP in order to be exempt from legal nonconforming status; this may also provide an opening to add new conditions to match those applicable to other parks with valid CUPs. County staff may simultaneously want to consider amending the termination of use provision that currently applies to mobile home parks.
2. Consider a Longer and Standard Term for Mobile Home Park CUPs. There is currently no standard term for a mobile home park CUP. Park owners noted that shorter CUP terms, such as a 5-year term, were burdensome and made securing loans more difficult due to the uncertainty created. A standard CUP term of 15 or 20 years would reduce administrative burden on park owners and aid borrowing relationships, an important factor for the continued financial feasibility of parks.

3. Explore Legal Mechanism to Document Current Park Densities as Required Densities: Because the existing densities of mobile home parks in the County are extremely varied, and as noted in this study, the relationship between a park's actual density (in terms of pad spaces per acre) and the allowable density (in terms of dwelling units per acre, Floor Area Ratio or other density/intensity standard) has implications for its legal status and risk of redevelopment, it is recommended that the County explore the adoption of density requirements that reflect the precise current residential density of each of the mobile home parks. Inasmuch as mobile home parks consist of rented pad spaces on which mobile homes sit, "density" for purposes of the County Zoning Code could be considered as the number of pad spaces per acre, in much the same way as the number of residential units per acre on an individual land parcel in residential zones. This could potentially be codified as a list of mobile home parks by name and existing densities (number of existing pad spaces per acre, inclusive of any vacant pad spaces). County staff could request confirmation of existing density from all mobile home park owners prior to codification, and subsequently perform an audit for a portion of the parks each year, subject to review of County Counsel.
4. Align Mobile Home Park Closure Requirements with Best Practices. Closure policies are being studied independently from this report, but were a key preservation measure that other jurisdictions noted as the most effective policy barrier to unwanted redevelopment. According to GSMOL, a model closure ordinance includes the following components: statements of purpose reflecting the need for preserving mobile home parks as affordable housing within the community; separate impact report criteria; relocation plans for the homeowner and their possessions; requirement that the replacement location be comparable to the original mobile home and park; and use of "In Place Fair Market Value" as a standard for re-imbursement of home value to the displaced resident. The conversion ordinance should distinguish between mobile home park conversions by the owner which will displace current residents and conversions to resident ownership.

Recommendations for Future Consideration

1. Incorporate Hazards Analysis into Decision-making Criteria for Park Expansions: As DRP considers longer-term zoning and land use protections for mobile home parks, and in the interim, continues to regulate mobile home parks through the CUP process, preservation and expansion objectives should be balanced with consideration of a site's future suitability for residential use. DRP should consider adopting a set of criteria to guide discretionary approvals for mobile home park expansion and new development through the CUP process. These same criteria may be used in the future to determine whether a mobile home park is included in an overlay zone or land use designation intended to permanently preserve mobile home parks. Potential criteria for denying a mobile home park expansion might include location in a "very high" fire hazard severity zone, or in a Class 2 or above General Plan hazard category; in other words, areas where life-threatening hazards are present. Applying these criteria would, however, prevent 35 parks (41% of parks) from expanding. This will require explicitly weighing the implications for preserving or expanding an important element of the County's housing stock and possible displacement against the hazard severity and danger posed to residents.
2. Adopt General Plan/Housing Element Language on Mobile Home Park Preservation: As a first step to future measures to apply an overlay zone or a new General Plan land use designation for mobile home parks, the County should consider introducing mobile home park preservation goals in the Housing Element and other Elements of the General Plan. Currently, the General Plan does not explicitly state that preservation of mobile home parks is a County priority. An example of General Plan mobile home park preservation language can be found in the City of San Jose's General Plan, recently updated to include a mobile home park preservation housing policy goal: "Preserve existing mobilehome parks throughout the City in order to reduce and avoid the displacement of long-term residents, particularly

senior citizens, the disabled, low-income persons, and families with school-age children, who may be required to move from the community due to a shortage of replacement mobilehome housing, and to maintain a variety of individual choices of tenure, type, and location of housing.”²⁷

3. Adopt an Overlay Zone and a Consistent Mobile Home Park Land Use Designation: Outreach and research showed that overlay zones are the widely accepted land use best practice for mobile home park preservation. Placing each mobile home park in an Overlay Zone and then requiring a mobile home park owner that wishes to redevelop a park to pursue a zone change or General Plan land use designation change maximizes planning control over mobile home park conversions, and signals that the continued use of the land as a mobile home park is a County priority. Importantly, creating a mobile home park land use designation could also eliminate the inconsistencies in the current approach to regulating density.

²⁷ City of San Jose General Plan, Chapter 4 “Quality of Life: Housing,” Section H-1.11.

Appendix 1: Revised EJSM Methodology

HR&A's Revised EJSM Methodology

The EJSM score developed as a part of the Green Zones Program is comprised of four components. The four components that make up this score are:

- 1) Hazard Proximity and Sensitive Land Uses;
- 2) Social and Health Vulnerability;
- 3) Health Risk and Exposure; and
- 4) Climate Change Vulnerability.

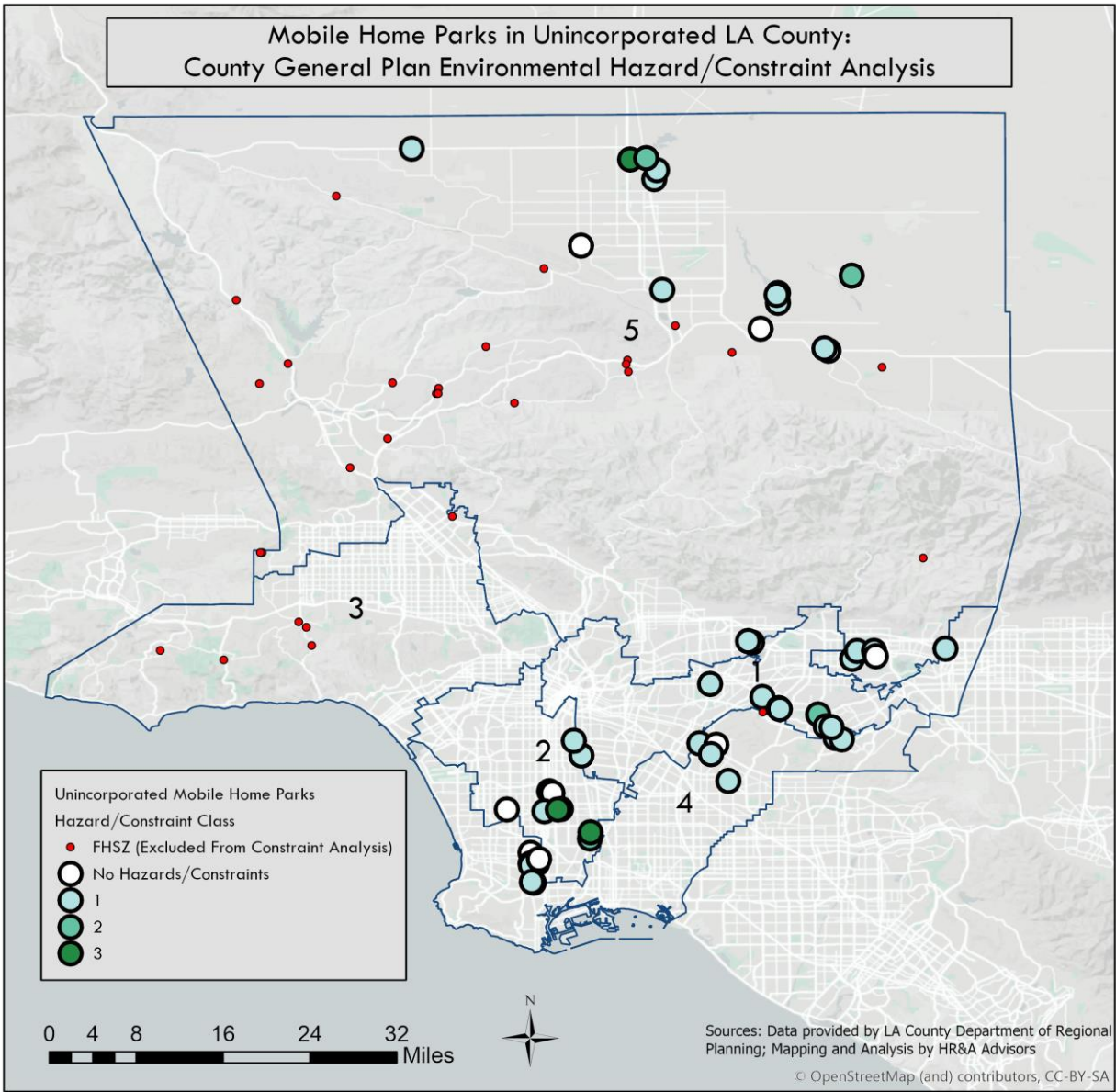
The Social and Health Vulnerability score is based exclusively on demographic data like percent people of color, percent living below the poverty line, and median house value²⁸. Because these types of purely demographic data were included, HR&A and DRP decided to exclude Social Health and Vulnerability scores from the analysis so as to focus on location-based factors.

With this revised scoring system, the Social and Health Vulnerability score of each park is subtracted from the total EJSM Score. As such, the Revised EJSM Score ranges from 3 to 15, where three is least vulnerable and 15 is most vulnerable.

²⁸ More detailed information on EJSM Data sources is available here:
http://planning.lacounty.gov/assets/img/gis/agol/Green_Zones_EJSM_Data_Sources.pdf

Appendix 2: Supplemental Spatial Analysis Maps

Figure 19: County General Plan Environmental Hazards/Constraints



Source: DRP, HR&A

Figure 20: Hazards/Constraints in Antelope Valley

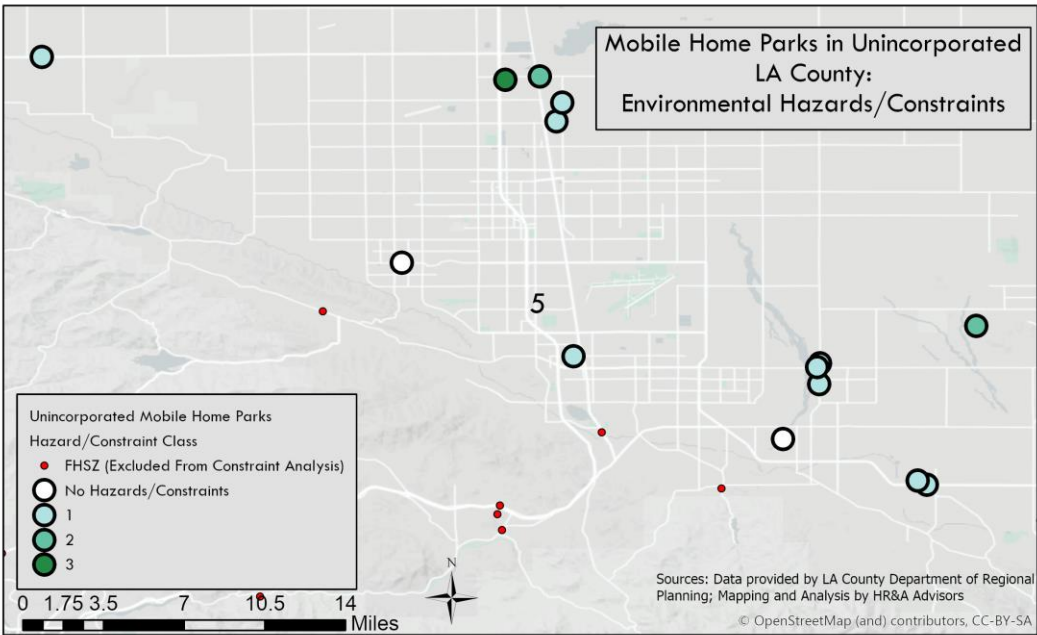
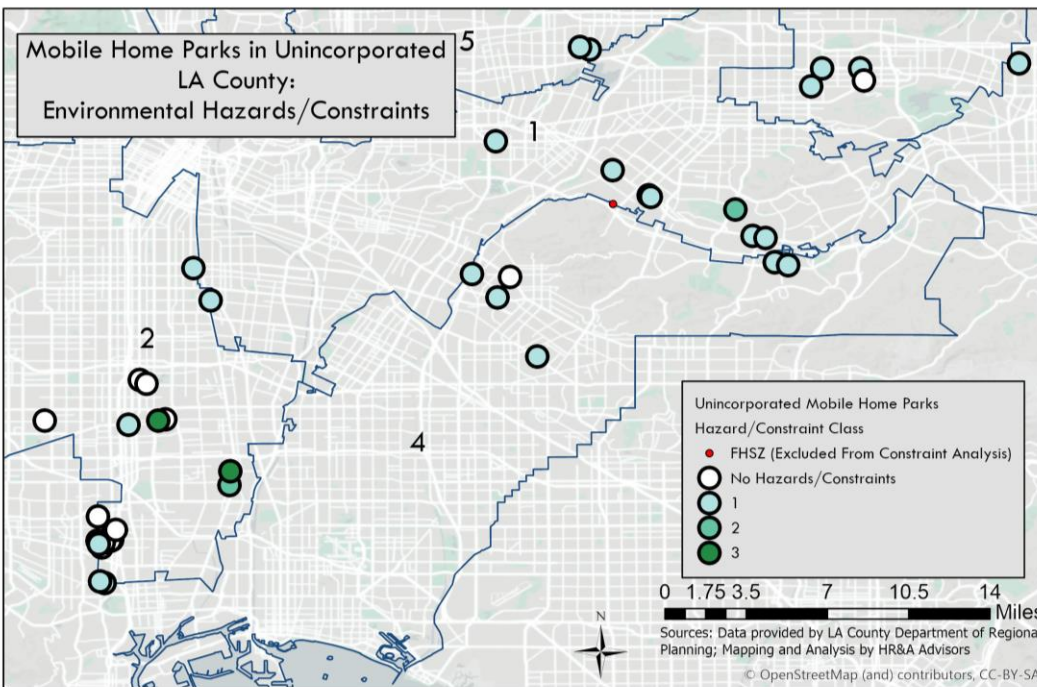


Figure 21: Hazards/Constraints in Los Angeles and San Gabriel Valley



Appendix 3: Outreach

Figure 22: Organizations Participating in Outreach

Organizations Participating in Outreach
City of San Jose
San Mateo County
Ventura County
County of Santa Cruz
San Luis Obispo County
Riverside County
City of Norwalk
City of Palm Springs
Golden State Manufactured Homeowner League
Western Manufactured Housing Communities Association, including representatives of five LA County mobile home parks
City of Lancaster
Martha Miller, Zoning Consultant

Appendix 4: Sample Mobile Home Park Conversion Ordinance from Half Moon Bay

Chapter 18.30 MOBILE HOME PARK CONVERSION

Sections:

- 18.30.010 Purpose and intent.**
- 18.30.015 Definitions.**
- 18.30.020 Vacancy rate in excess of twenty percent--Notice required.**
- 18.30.025 Use permit required.**
- 18.30.030 Conversion impact report required.**
- 18.30.035 Relocation plan required.**
- 18.30.040 Required findings for conversion.**
- 18.30.045 Conditions of approval.**
- 18.30.050 Effective date of conversion.**
- 18.30.055 Issuance of grading and/or building permits.**
- 18.30.060 Violations.**

18.30.010 Purpose and intent.

The stated purpose and intent of the mobile home park conversion chapter is to ensure that any proposed conversion of an existing mobile home park to any other use is preceded by adequate notice, that the social and fiscal impacts of the proposed conversion are adequately defined prior to consideration of a proposed conversion and that relocation and other assistance is provided park residents, consistent with the provisions of this chapter and Sections [65863.7](#) and [66427.4](#) of the California Government Code. (1996 zoning code (part)).

18.30.015 Definitions.

For purposes of this chapter the following terms shall have the meanings indicated:

- A. "Commercial coach" means a structure transportable in one or more sections, designed and equipped for human occupancy for industrial, professional or commercial uses and shall include a trailer coach as defined in Section [635](#) of the Vehicle Code.

B. “Comparable housing” means housing which is comparable in floor area and number of bedrooms to the mobile home to which comparison is being made, which housing meets the minimum standards of the state Uniform Housing Code.

C. “Comparable mobile home park” means any other mobile home park substantially equivalent in terms of park conditions, amenities and other relevant factors.

D. “Conversion” means changing the use of a mobile home park for a purpose other than the rental, or the holding out for rent, of two or more mobile home sites to accommodate mobile homes used for human habitation. Such a conversion may affect an entire mobile home park or any portion thereof. A conversion shall include, but is not limited to, a change of any existing mobile home park or any portion thereof to condominium, stock cooperative, planned unit development, or any form of ownership wherein spaces within the mobile home park are to be sold, and the cessation of use of all or a portion of the park as a mobile home park, whether immediately or on a gradual basis, or the closure of the park. “Conversion” shall not include mere purchase of the park by its existing residents.

E. “Date of application for change of use” means the date of filing of an application for a rezoning, general plan and/or local coastal plan amendment, use permit, subdivision, planned unit development plan, architectural, landscape, and site plan review, or any other discretionary land use application approval under Titles 17 and/or 18, which application seeks approval of a change of use of or at a mobile home park.

F. “Eligible mobile home owner” means a mobile home owner whose mobile home was located in a mobile home park on the date of application for a change of use.

G. “Home owner” means the registered owner or owners of a mobile home, who has a tenancy in a mobile home park under a rental or lease agreement.

H. “Mobile home” means a structure designed for human habitation and for being transportable on a street or highway under permit pursuant to California Vehicle Code Section [35790](#), and as defined in Section [18008](#) of the Health and Safety Code. “Mobile home” does not include a recreational vehicle, as defined in Civil Code Section [799.24](#), or a commercial coach, as defined herein and in Section [182.18](#) of the Health and Safety Code.

I. “Mobile home park” means an area of land where two or more mobile home sites are rented, or held out for rent, to accommodate mobile homes used for habitation. For purposes of this chapter, “mobile home park” shall not include a mobile home subdivision, stock cooperative, or any park where there is any combination of common ownership of the entire park or individual mobile home sites.

J. “Mobile home space” means any area, tract of land, site, lot, pad, or portion of a mobile home park designated or used for the occupancy of one mobile home.

K. “Mobile home tenant” means a person who occupies a mobile home within a mobile home park pursuant to a bona fide lease or rental agreement with the mobile home owner and who, during his or her tenancy, was not the owner or member of the immediate household of the mobile home owner.

L. “Resident” means a person lawfully residing in a mobile home park, and includes a mobile home owner, mobile home tenant or member of the immediate household of the mobile home owner or mobile home tenant. (Ord. C-2019-03 §2(Exh. A)(part), 2019; 1996 zoning code (part)).

18.30.020 Vacancy rate in excess of twenty percent--Notice required.

The following shall apply when any mobile home park in the city has a vacancy rate of twenty percent or greater of the total number of spaces in existence in the mobile home park:

A. Whenever twenty percent or more of the total number of mobile home sites or mobile homes at a mobile home park are vacant or otherwise uninhabited and such situation was not caused by physical disaster, including but not limited to fire, flood, storm, earthquake, landslide, or by another natural condition beyond the control of the owner or operator of the mobile home park, the owner or operator of the park shall file with the community development director a written notice informing the city of the current vacancy rate at the park. For purposes of this chapter, a mobile home site is “uninhabited” or “vacant” when it is either: (1) unoccupied by a mobile home, or (2) occupied by a mobile home in which no persons reside. A mobile home shall not be considered vacant for purposes of this chapter if rent is being paid pursuant to a bona fide rental or lease agreement and the mobile home is merely unoccupied.

B. The written notice to the community development director from the owner or operator of the mobile home park shall clearly state any known reasons for the vacancy rate to be in excess of twenty percent, and whether or not the property owner intends in the immediate future to convert the mobile home park to another use.

C. If it is determined that the owner of the mobile home park intends to apply for a conversion of the mobile home park to another use, the community development director shall immediately inform the property owner of the requirements of this chapter. (Ord. C-2015-04 §1(part), 2015; 1996 zoning code (part)).

18.30.025 Use permit required.

In addition to any other necessary discretionary land use permit applications, the conversion of any existing mobile home park to any other use shall require the review of a use permit application by the planning commission, which shall forward a recommendation to the city council for final action. At a

minimum, each application for a use permit to convert a Mobile home park to any other use shall include the following and any additional information as may be required by this chapter and the community development director:

- A. A detailed narrative description of the proposed use to which the mobile home park is to be converted.
- B. The proposed timetable for implementation of the conversion and development of the site.
- C. Evidence that any tenant's rent had not been increased within the two months prior to the filing of an application for conversion of a mobile home park, and a statement from the applicant that the rent at the mobile home park shall not be increased for two years from the date of filing of the conversion application or until the date of the commencement of relocation activities.
- D. A report on the impact of the conversion of the mobile home park on its residents and a disposition/relocation plan addressing the availability of replacement housing for existing tenants of the mobile home park consistent with Section [65863.7](#) of the California Government Code.
- E. Upon filing an application for a use permit for conversion, the community development director shall inform the applicant of the requirements of Civil Code Section [798.56](#) and Government Code Section [65863.8](#) regarding notification of the mobile home park residents concerning the proposed conversion. The community development director shall specify in writing to the applicant the information that must be submitted in order to adequately notify all existing tenants as required by the California Government Code, the California Civil Code, and this chapter.
- F. No use permit application for the conversion of a mobile home park to another use shall be deemed complete and processing for consideration will not commence until the conversion impact report and relocation plan as required by this chapter have been reviewed by the community development director for substantial conformance with the requirements of this chapter. (Ord. C-2015-04 §1(part), 2015; 1996 zoning code (part)).

18.30.030 Conversion impact report required.

Any person filing an application for a use permit to convert a mobile home park to another use shall file a report on the impact of the change of use upon the residents of the mobile home park. At a minimum the conversion impact report shall include the following, as well as any other information deemed necessary and appropriate by the community development director:

- A. A detailed description of the mobile home spaces within the mobile home park, including but not limited to:

1. The total number of mobile home spaces in the park and the number of spaces occupied;
2. The length of time each space has been occupied by the present resident(s) thereof;
3. The age, size, and type of mobile home occupying each space;
4. The monthly rent currently charged for each space, including any utilities or other costs paid by the present resident(s) thereof;
5. Name and mailing address of the primary resident(s) of each mobile home within the mobile home park on three sets of gummed labels for the mailing of notice of public hearings.

B. A list of all comparable mobile home parks within the city and county. This list shall include the age of the mobile home park and the mobile homes therein, a schedule of rents for each park listed and the criteria of the management of each park for acceptance of new tenants and used mobile homes. Information pertaining to the availability of medical and dental services, shopping facilities, and all nearby social and religious services and facilities shall also be included.

C. A detailed analysis of the economic impact of the relocation on the tenants including comparisons of current rents paid and rents to be paid at comparable mobile home parks within the city, or the county, the estimated costs of moving a mobile home and personal property, and any direct or indirect costs associated with a relocation to another mobile home park.

D. A list of the names, addresses and telephone numbers of one or more housing specialists, with an explanation of the services these specialists will perform at the applicant's expense for the residents to be displaced. These services shall include but not be limited to assistance in locating a suitable replacement mobile home park, coordination of moving the mobile home and personal property, and any other tasks necessary to facilitate the relocation to another comparable mobile home park. (Ord. C-2015-04 §1(part), 2015; 1996 zoning code (part)).

18.30.035 Relocation plan required.

A relocation plan for tenants of a mobile home park shall be submitted to the planning commission and city council for approval as part of the application for a use permit to convert a mobile home park to another use. The relocation plan shall provide, at a minimum, for the following:

A. The names, addresses, telephone numbers, and fee schedules of persons in the area who are qualified MAI appraisers of mobile homes.

B. The names, addresses, telephone numbers, and fee schedules of persons in the area qualified as mobile home movers.

C. The relocation plan shall provide specifically for relocation assistance to full time, very low, low and moderate income residents and senior citizens over the age of sixty-two residing in the park for a minimum period of twelve months following closure of the mobile home park.

D. The relocation plan shall specifically provide guarantees that all tenants sixty-two years of age or older and all tenants who are medically proven to be permanently disabled shall not have to pay an increase in rent over the amount currently paid for a period of two years following relocation.

E. The relocation plan shall provide for the applicant to pay all reasonable moving expenses to a comparable mobile home park within the city or the county to any tenant who relocates from the park after city approval of the use permit authorizing conversion of the park. The reasonable cost of relocation and moving expenses shall include the cost of relocating a displaced homeowner's mobile home, accessories, and possessions, including the costs for disassembly, removal, transportation, and reinstallation of the mobile home and accessories, at the new site, and replacement or reconstruction of the blocks, skirting, siding, porches, decks, awnings, storage sheds, cabanas, or earthquake bracing if necessitated by the relocation; indemnification for any damage to personal property of the resident caused by the relocation; reasonable living expenses of displaced park residents from the date of actual displacement to the date of occupancy at the new site; payment of any security deposit required at the new site; and the difference between the rent paid in the existing park and any higher rent at the new site for the first twelve months of the relocated tenancy. When any tenant has given notice of his intent to move prior to city approval of the use permit, eligibility to receive moving expenses shall be forfeited.

F. If the city council determines that a particular mobile home cannot be relocated to a comparable mobile home park within the city or the county, and the mobile home owner has elected to sell his or her mobile home, the relocation plan shall identify those mobile homes, the reasons why the mobile homes cannot be relocated as provided in subsection E of Section 18.30.035, then the city council may, as a part of the reasonable cost of relocation as provided in Government Code Section [65863.7\(e\)](#) require the applicant to provide for purchasing the mobile home of a displaced home owner at its in-place market value. Such value shall be determined after consideration of relevant factors, including the value of the mobile home in its current location including the blocks and any skirting, siding, porches, decks, storage sheds, cabanas, and awnings, and assuming the continuation of the mobile home park in a safe, sanitary and well-maintained condition, and not considering the effect of the change of use on the value of the mobile home. If a dispute arises as to the in-place value of a mobile home, the applicant and the home owner shall have appraisals prepared by separate qualified MAI appraisers with experience in establishing the value of mobile homes. The city council shall determine the in-place value based upon the average of the appraisals submitted by the applicant and mobile home owner. (1996 zoning code (part)).

18.30.040 Required findings for conversion.

In approving a use permit for a mobile home park conversion, the city council shall find that the proposed conversion meets the following requirements in addition to the other requirements of this chapter:

- A. That the proposed use of the property is consistent with the local coastal program land use plan, the general plan and any and all of its elements, any applicable planned unit development plan, and this chapter.
- B. That the residents of the mobile home park have been adequately notified of the proposed conversion, including information pertaining to the anticipated timing of the proposed conversion.
- C. That there exists land zoned for new or replacement comparable mobile home parks or adequate space is available in other comparable mobile home parks within the city or the county for the residents who will be displaced.
- D. That the conversion will not result in the displacement of very low, low, or moderate income mobile home residents or senior citizens over the age of sixty-two who cannot afford rents charged in other mobile home parks within the city or the county, unless otherwise approved by the city council.
- E. That the age, type, size, and style of mobile homes to be displaced as a result of the conversion will be able to be relocated into other comparable mobile home parks within the city or the county, or that the applicant has agreed to purchase any mobile home that cannot be relocated at its in-place value as provided in this chapter.
- F. That any mobile home residents displaced as a result of the conversion shall be compensated by the applicant for all reasonable costs incurred as a result of their relocation.
- G. That the relocation plan mitigates the impacts of the displacement of individuals or households for a reasonable transition period and mitigates the impacts of any long-term displacement. (1996 zoning code (part)).

18.30.045 Conditions of approval.

The city council shall impose any necessary and appropriate conditions of approval to satisfy and implement the intent, purpose, and content of this chapter. In addition, any other necessary and appropriate conditions of approval to protect the health and safety of the residents of the city may be imposed. (1996 zoning code (part)).

18.30.050 Effective date of conversion.

The city council shall establish the date on which the permit for conversion will become effective. Such date shall not be less than two years from the decision of the city council, provided that conversion at an earlier date may be approved if the city council receives a written petition requesting an earlier date signed by a majority of those persons residing in the subject mobile home park at the time of the city council public hearing to consider the conversion application. The effective date of the approval in such a case shall be the date set forth in the petition. Conversion at the earlier date may be approved only if the city council makes specific findings that the applicant has complied with all the provisions of an approved relocation plan and submitted evidence of such compliance to the community development director as provided in Section 18.30.055. (Ord. C-2015-04 §1(part), 2015; 1996 zoning code (part)).

18.30.055 Issuance of grading and/or building permits.

No building permit shall be issued for the development of or on any real property which is being converted from a mobile home park pursuant to this chapter unless and until the applicant has filed with the community development director a verified statement made under penalty of perjury that all conditions of approval have been met or otherwise incorporated into the final project plans including the payment of all required relocation assistance required pursuant to this chapter. Such statement shall identify in itemized form each payee, the amount paid, the date of payment, and the type of relocation or other assistance for which each such payment was made. (Ord. C-2015-04 §1(part), 2015; 1996 zoning code (part)).

18.30.060 Violations.

In addition to any remedies or penalties for noncompliance with any city ordinance as provided elsewhere in the municipal code, any park owner or applicant who violates any rights of any mobile home owner or mobile home tenant established under this chapter shall be liable to said person for actual damages caused by such violation, plus costs and reasonable attorney's fees. In addition, no park owner shall take any willful action to threaten, retaliate against or harass any park resident with the intent to prevent such residents from exercising his or her rights under this chapter. (1996 zoning code (part)).

NOTICE OF PUBLIC HEARING

The Los Angeles County Board of Supervisors (Board) will conduct a public hearing to consider the project described below. You will have an opportunity to testify, or you can submit written comments to the planner below or at the public hearing. If you challenge the project in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the Board at, or prior to, the public hearing.

Hearing Date and Time: Tuesday, October 27, 2020 at 9:30 a.m.

Hearing Location: 500 West Temple St., Room 383, Los Angeles, CA 90012

Please note that the location of the public hearing and/or process for holding the public hearing are subject to change due to COVID-19. Please check the Board's homepage, <http://bos.lacounty.gov/>, for the most up to date public hearing information.

Project: Project No. PRJ2020-000307, Case No(s). RPPL2020001473 and RPPL2020001474

Project Location: Countywide (unincorporated)

CEQA Determination: Addendum to Certified Final EIR Project 02-305 Los Angeles County General Plan

Project Description: Proposed amendments to the Los Angeles County Code, Titles 8, 21 and 22, to require one-for-one replacement of affordable rental units lost due to demolition, vacation or conversion from rental to ownership; require applications for condominium conversions to include prior notification to nonprofit organizations; clarify provisions regarding permitting, repair, and maintenance of mobilehome parks; remove the requirement for a Variance to modify standards for mobilehome parks; and create an administrative density bonus for existing mobilehome parks to deem the the existing total number of mobilehome spaces as the maximum number of dwelling units permitted on site.

For more information regarding this project, contact **Ayala Scott** at the Los Angeles County Department of Regional Planning (DRP), 320 W. Temple St., Los Angeles, CA 90012. Telephone: (213) 974-6417, Fax: (213) 626-0434, E-mail: ascott@planning.lacounty.gov. Case materials are available online at <http://planning.lacounty.gov/ahpo>. All correspondence received by DRP shall be considered a public record.

If you need reasonable accommodations or auxiliary aids, contact the Americans with Disabilities Act (ADA) Coordinator at (213) 974-6488 (Voice) or (213) 617-2292 (TDD) with at least 3 business days' notice. **Si necesita más información por favor llame al (213) 974-6427.**