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MARY C. WICKHAM
County Counsel

November 10, 2020

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

Agenda No. 87
08/04/20

Re: Ordinance Amending the Los Angeles County Code, Title 22 – Planning and Zoning to Include the Inclusionary Housing Ordinance

Dear Supervisors:

Your Board previously conducted a duly-noticed public hearing regarding the above-referenced ordinance amending the Los Angeles County Code, Title 22 – Planning and Zoning, to establish an Inclusionary Housing Program in the unincorporated areas of Los Angeles County.

At the conclusion of the public hearing, your Board indicated an intent to approve the ordinance and instructed our office to prepare the final ordinance.

Enclosed are the analysis and final ordinance for your consideration.

Very truly yours,

MARY C. WICKHAM
County Counsel

By for Casey Yourn
CASEY YOURN
Senior Deputy County Counsel
Property Division

APPROVED AND RELEASED:

THOMAS J. FAUGHNAN
Senior Assistant County Counsel

SC:CY:ss
Enclosure

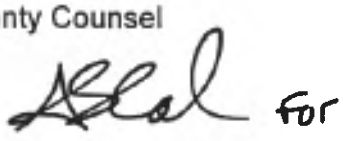
c: Fesia Davenport, Acting Chief Executive Officer
Celia Zavala, Executive Officer, Board of Supervisors
Amy J. Bodek, Director, Department of Regional Planning

HOA.102475380.2

ANALYSIS

This ordinance, amending the Los Angeles County Code, Title 22 – Planning and Zoning, establishes an Inclusionary Housing Program to ensure the production of affordable housing units in new development in the unincorporated areas of Los Angeles County by establishing affordable housing set-aside requirements on residential projects that meet certain criteria.

MARY C. WICKHAM
County Counsel

By  for

CASEY YOURN
Senior Deputy County Counsel
Property Division

CY:ss

Requested: 04/15/2020

Revised: 10/16/2020

ORDINANCE NO. _____

An ordinance amending Title 22 – Planning and Zoning of the Los Angeles County Code to establish an Inclusionary Housing Program in the unincorporated areas of Los Angeles County.

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

SECTION 1. 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 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), and Chapter 22.166 (Housing Permits):

Affordable housing cost. ~~As defined in Section 50052.5 of the California Health and Safety Code.~~

1. Unless otherwise specified, as defined in section 50052.5 of the California Health and Safety Code.

2. For middle income households, affordable housing cost shall not be less than 28 percent of the gross income of the household, and shall not exceed the product of 35 percent times 130 percent of area median income adjusted for family size appropriate for the unit.

Affordable housing set-aside. Dwelling units reserved for extremely low, very low, lower, ~~or~~ moderate, or middle income households.

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

Affordable sale price. The maximum sale price of an affordable unit based on the affordable housing cost, as determined by the County.

...

Housing development. A residential development project, ~~for five or more dwelling units,~~ including mixed use developments. It may also be a subdivision or a common interest development, as defined in ~~S~~section 4100 of the California Civil Code, approved by the County and consisting of dwelling units or unimproved residential lots. ~~It may also be either a project to substantially rehabilitate and convert an existing commercial building to residential use, or the substantial rehabilitation of an existing multi-family dwelling, as defined in Section 65863.4(d) of the California Government Code, where the result of rehabilitation would be a net increase in available dwelling units.~~

...

Incentive. ~~As specified in Section 65915(k) of the California Government Code, a~~A reduction of a development standard or a modification of a zoning code requirement, or other regulatory incentive or concession, that results in identifiable and actual cost reductions to provide for affordable housing costs or rents.

Income. See "Income" for the following:

Area median income.

Extremely low income.

Lower income.

Moderate income.

Middle income.

...

Specific adverse impact. As defined in ~~S~~section 65589.5(d)(2) of the California Government Code.

Submarket area. A geographic area with similar land use and real estate markets, as depicted in Figures 22.14.010-A through 22.14.010-F, below.

FIGURE 22.14.010-A: ANTELOPE VALLEY SUBMARKET AREA

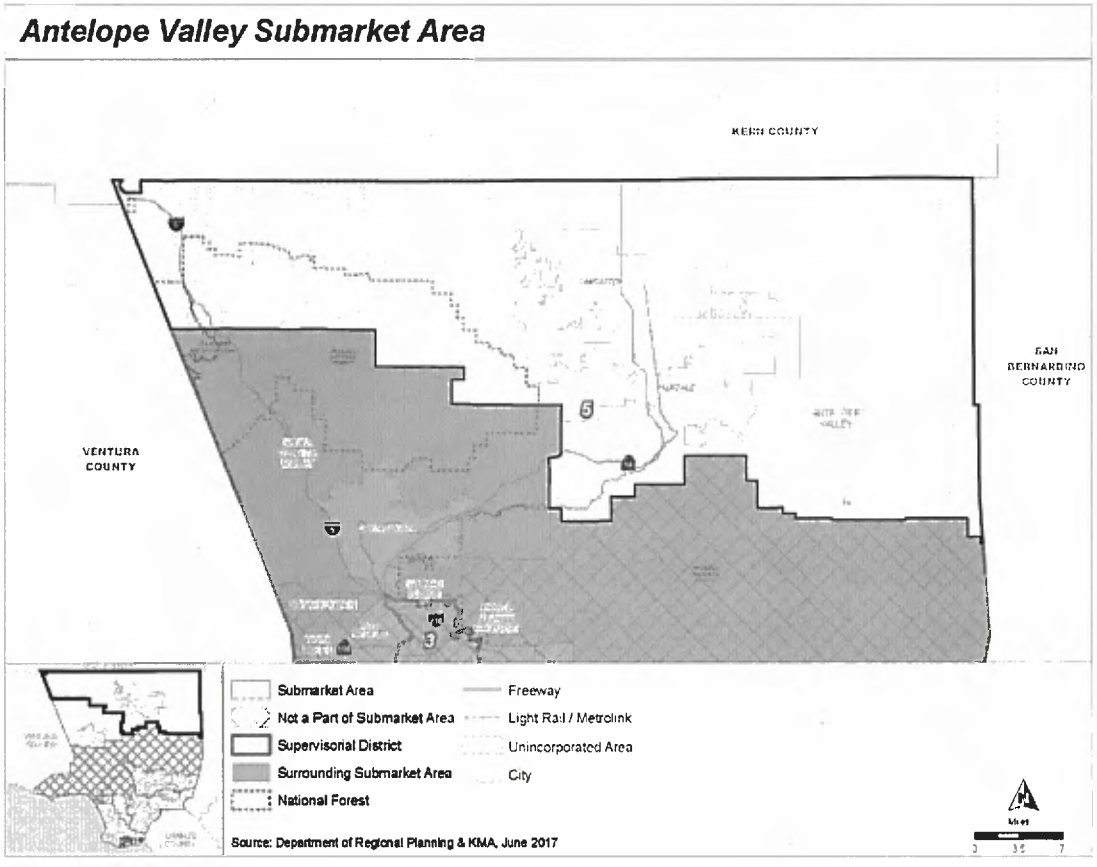


FIGURE 22.14.010-B: COASTAL SOUTH LOS ANGELES SUBMARKET AREA

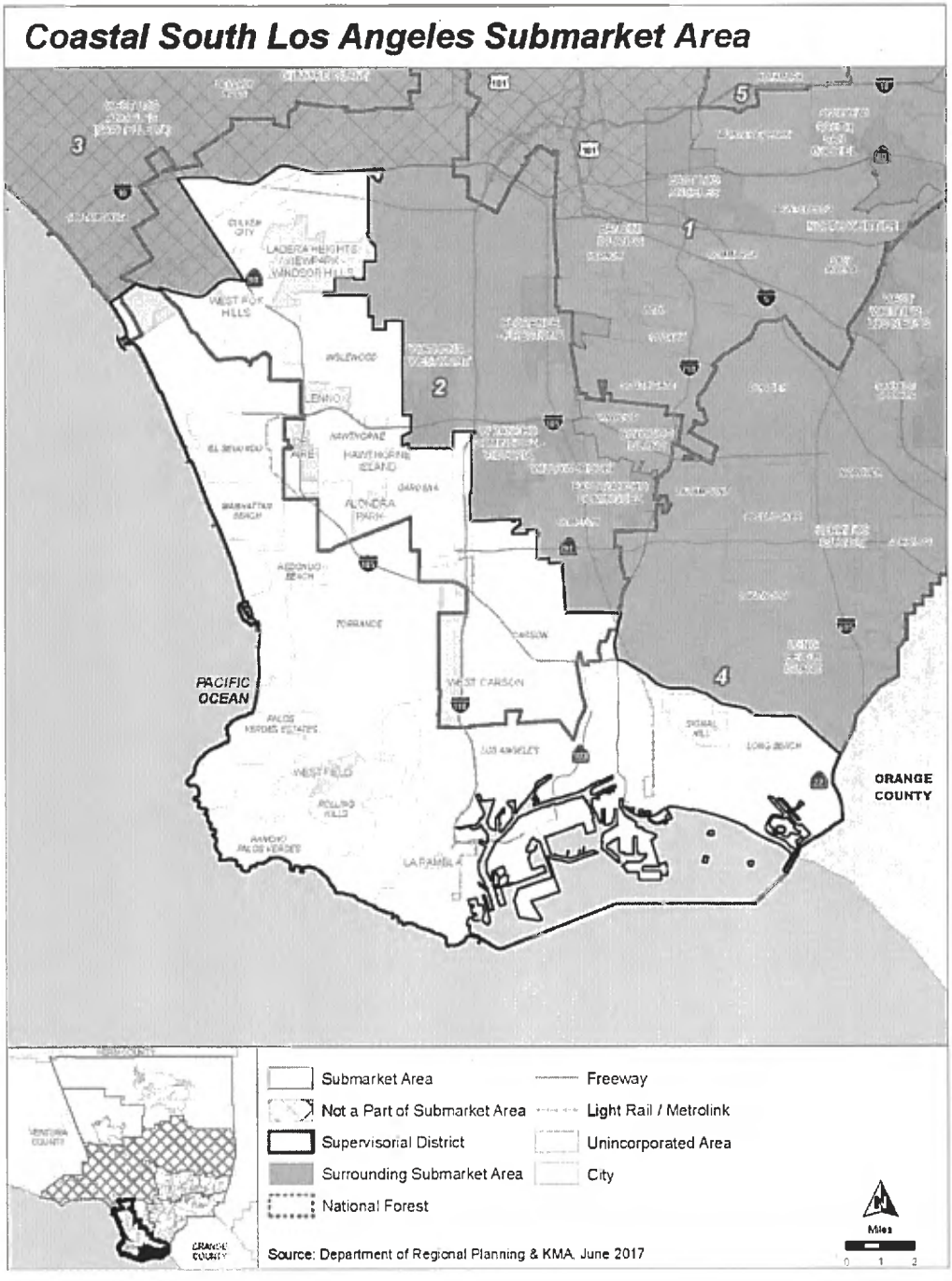


FIGURE 22.14.010-C: EAST LOS ANGELES/GATEWAY SUBMARKET AREA

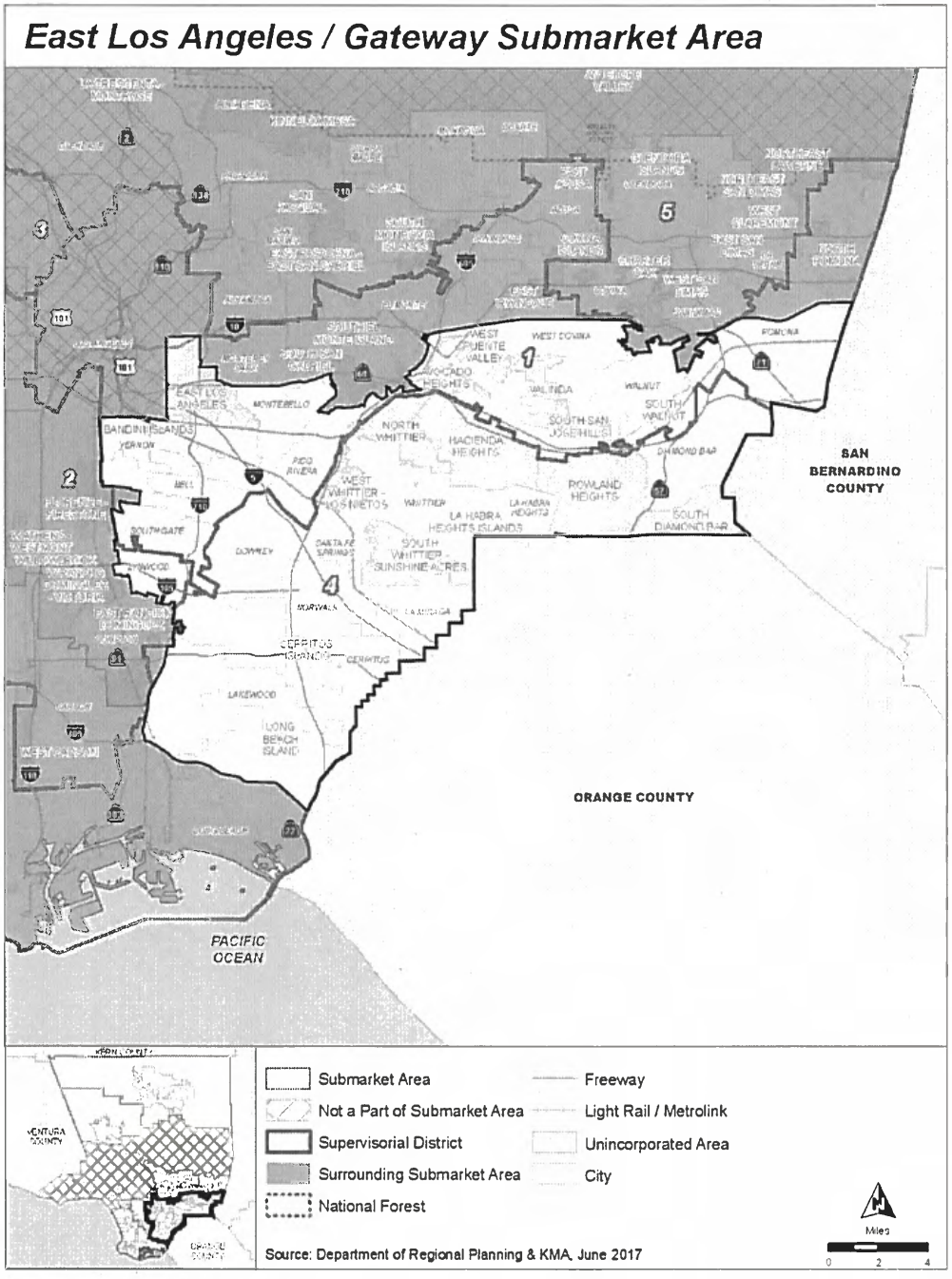


FIGURE 22.14.010-D: SAN GABRIEL VALLEY SUBMARKET AREA

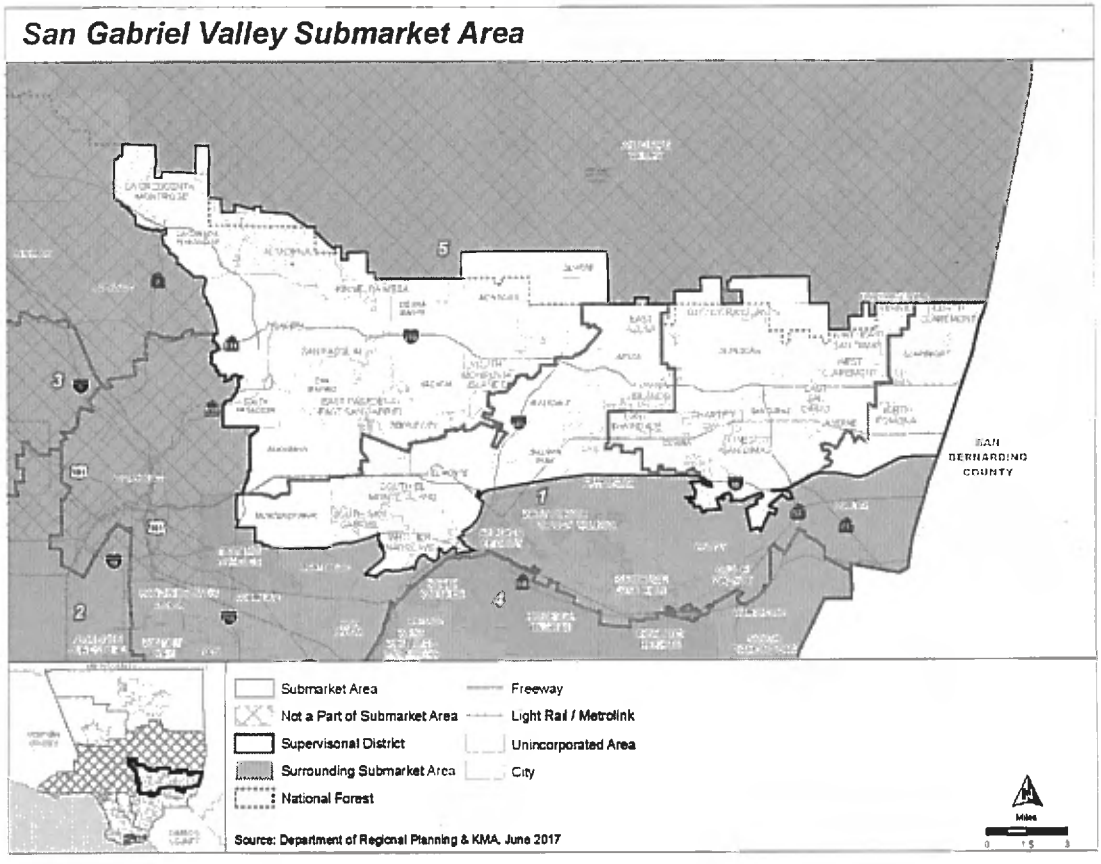


FIGURE 22.14.010-E: SANTA CLARITA VALLEY SUBMARKET AREA

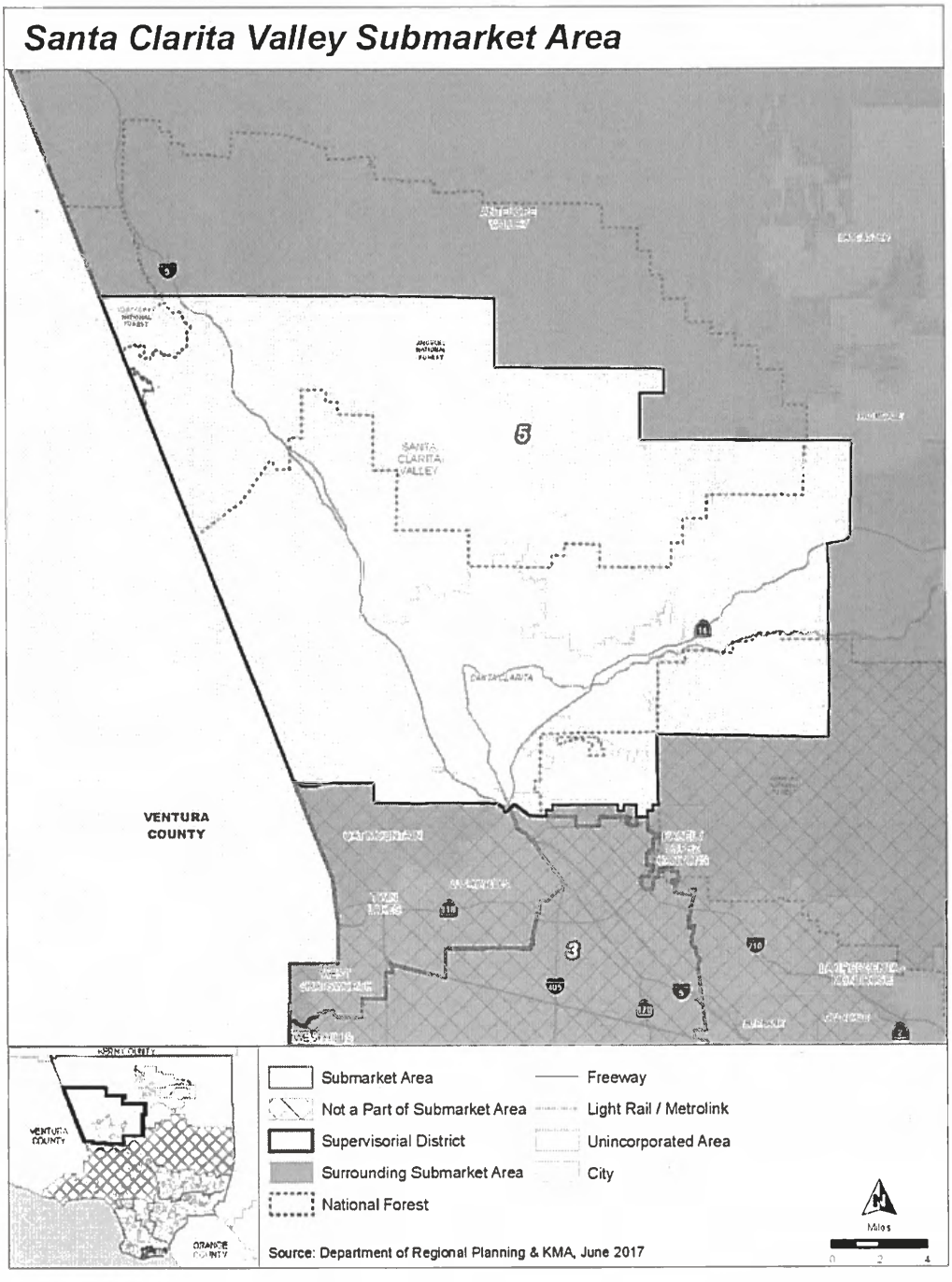
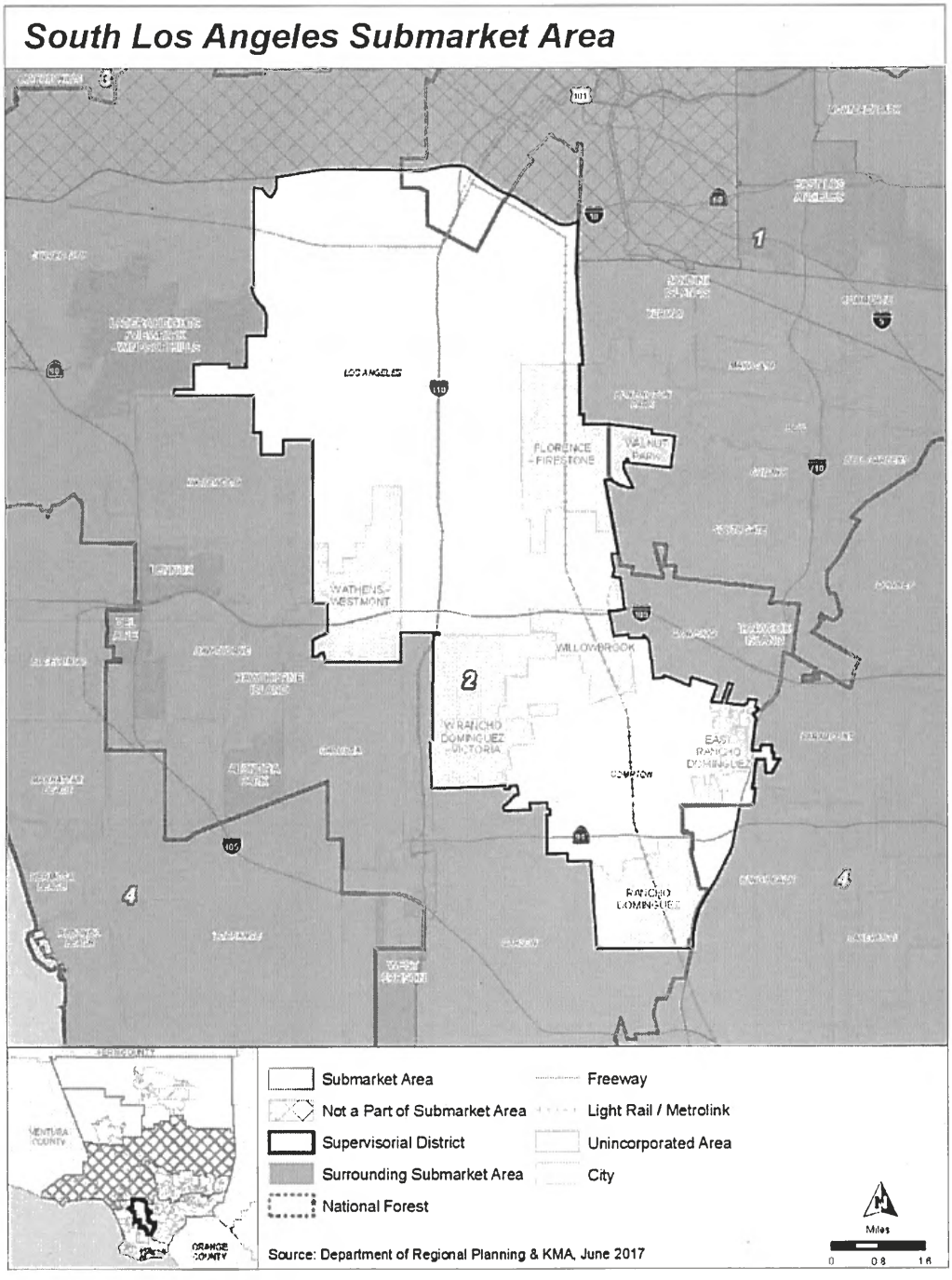


FIGURE 22.14.010-F: SOUTH LOS ANGELES SUBMARKET AREA



Waiver or reduction of development standards. ~~As specified in Section 65915(e) of the California Government Code, a~~A waiver or reduction of development standards that has the effect of physically precluding the construction of a project at the densities or with the incentives permitted by Chapter 22.120 (Density Bonus) or Chapter 22.121 (Inclusionary Housing).

...

SECTION 2. Section 22.14.090 is hereby amended to read as follows:

22.14.090 I.

...

Income.

Area median income. The current median annual household income for Los Angeles County, as estimated yearly by the United States Department of Housing and Urban Development or as published by the California Department of Housing and Community Development.

Extremely low income. An annual income for a household which does not exceed 30 percent of the area median income, as specified by ~~S~~section 50106 of the California Health and Safety Code.

~~Low income. An annual income for a person or a family which does not exceed 80 percent of the area median income.~~

Lower income. An annual income for a household which does not exceed 80 percent of the area median income, as specified by ~~S~~section 50079.5 of the

California Health and Safety Code. "Low Income" shall mean the same as "Lower Income."

Middle income. An annual income for a household that does not exceed 150 percent of the area median income.

...

SECTION 3. Section 22.16.030 is hereby amended to read as follows:

22.16.030 Land Use Regulations for Zones A-1, A-2, O-S, R-R, and W.

...

C. Use Regulations.

1. Principal Uses. Table 22.16.030-B, below, identifies the permit or review required to establish each principal use.

TABLE 22.16.030-B: PRINCIPAL USE REGULATIONS FOR AGRICULTURAL, OPEN SPACE, RESORT AND RECREATION, AND WATERSHED ZONES						
	A-1	*A-2*	*O-S*	*R-R*	*W*	*Additional Regulations*
...						
Residential Uses						
...						
Notes: ... 16. Use may also be subject to Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), or~~and~~ Chapter 22.166 (Housing Permits)~~if it includes affordable housing or senior citizen housing~~.						

...

SECTION 4. Section 22.18.030 is hereby amended to read as follows:

22.18.030 Land Use Regulations for Zones R-A, R-1, R-2, R-3, R-4, and R-5.

...

C. Use Regulations.

1. Principal Uses. Table 22.18.030-B, below, identifies the permit or review required to establish each principal use.

TABLE 22.18.030-B: PRINCIPAL USE REGULATIONS FOR RESIDENTIAL ZONES

	R-A	*R-1*	*R-2*	*R-3*	*R-4*	*R-5*	*Additional Regulations*
...							
Residential Uses							
...							
Single-family residences[8]	SPR	SPR	SPR	SPR	SPR	-	Section 22.140.580
Single-family residences on compact lots[8]	-	-	CUP	CUP	CUP	-	Section 22.140.585
...							

Notes:

...

8. Use may also be subject to Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), or~~and~~ Chapter 22.166 (Housing Permits) ~~if it includes affordable housing or senior citizen housing~~.

...

SECTION 5. Section 22.20.030 is hereby amended to read as follows:

22.20.030 Land Use Regulations for Zones C-H, C-1, C-2, C-3, C-M, C-MJ, and C-R.

...

C. Use Regulations.

1. Principal Uses. Table 22.20.030-B, below, identifies the permit or review required to establish each principal use.

TABLE 22.20.030-B: PRINCIPAL USE REGULATIONS FOR COMMERCIAL ZONES								
	C-H	*C-1*	*C-2*	*C-3*	*C-M*	*C-MJ*	*C-R*	*Additional Regulations*
...								
Residential Uses								
...								
Notes: ... 25. Use may also be subject to Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), orand Chapter 22.166 (Housing Permits) ~~if it includes affordable housing or senior citizen housing~~. ...								

...

SECTION 6. Section 22.24.030 is hereby amended to read as follows:

22.24.030 Land Use Regulations for Rural Zones.

...

C. Use Regulations.

1. Principal Uses. Table 22.24.030-B, below, identifies the permit or review required to establish each principal use.

TABLE 22.24.030-B: PRINCIPAL USE REGULATIONS FOR RURAL ZONES			
	C-RU	*MXD-RU*	*Additional Regulations*
...			
Residential Uses			
...			
Notes: ... 13. Use may also be subject to Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), orand Chapter 22.166 (Housing Permits) ~~if it includes affordable housing or senior citizen housing~~.			

...

SECTION 7. Section 22.26.030 is hereby amended to read as follows:

22.26.030 Mixed Use Development Zone.

...

B. Land Use Regulations.

...

3. Use Regulations.

a. Principal Uses.

i. Table 22.26.030-B, below, identifies the permit or review required to establish each principal use.

TABLE 22.26.030-B: PRINCIPAL USE REGULATIONS FOR ZONE MXD		
		Additional Regulations
...		
Residential Uses		
...		
Notes: ... 7. Use may also be subject to Chapter 22.120 (Density Bonus), Chapter 22.121 (Inclusionary Housing), or~~and~~ Chapter 22.166 (Housing Permits)~~ if it includes affordable housing or senior citizen housing~~.		

...

E. Modifications of Development Standards. With the exception of a height bonus granted through lot consolidation in Subsection G, below, the development standards specified in Subsection D, above, may be modified as follows:

...

2. Notwithstanding Subsection E.1, above, any development standard specified in Subsection D, above, may be waived or modified in accordance with

Chapter 22.120 (Density Bonus) or Chapter 22.121 (Inclusionary Housing), subject to an Administrative Housing Permit (Section 22.166.040) application, and shall require the approval of a Ministerial Site Plan Review (Chapter 22.186) application.

...

SECTION 8. Section 22.46.030 is hereby amended to read as follows:

22.46.030 Administration.

Specific Plans and associated regulations shall be administered in accordance with Article 8, Chapter 3, Division 1, Title 7 and other applicable provisions of the California Government Code. Such plans and regulations may reference existing provisions and procedures of this Title 22 or they may develop different administrative procedures to use in the implementation of the Specific Plan. Except as otherwise expressively provided in a Specific Plan, property may be used for any purpose and subject to all of the standards and requirements of the basic zone. Where the regulations of a Specific Plan differ from the provisions of the basic zone, such regulations shall supersede the provisions of the basic zone as specified in the Specific Plan.

B. Exceptions.

1. Density Bonus or Inclusionary Housing. Notwithstanding any contrary provisions in this Chapter, any Specific Plan regulations specified in Subsection A, above, may be waived or modified through a Housing Permit (Chapter 22.166) pursuant to Chapter 22.120 (Density Bonus) or Chapter 22.121 (Inclusionary Housing).

...

SECTION 9. The Chapter headings for Division 6 are hereby amended to read as follows:

DIVISION 6: DEVELOPMENT STANDARDS.

Chapters:

...

Chapter 22.120 Density Bonus.

Chapter 22.121 Inclusionary Housing.

...

SECTION 10. Section 22.120.030 is hereby amended to read as follows:

22.120.030 Applicability.

Notwithstanding any contrary provisions in this Title 22, the provisions of this Chapter, in conjunction with Chapter 22.166 (Housing Permits), shall apply in all zones that allow residential use as a principal use, and apply to the eligible housing developments, including projects to substantially rehabilitate and convert an existing multi-family dwelling, as defined in section 65863.4 (d) of the California Government Code, where the result of the rehabilitation would be a net increase in available dwelling units.

SECTION 11. Section 22.120.050 is hereby amended to read as follows:

22.120.050 Affordable Housing.

...

B. Affordable Housing Set-Aside.

1. Duration of Affordability~~ – Rental. The affordability term for affordable housing set-aside units shall be at least 55 years from the issuance of the final certificate of occupancy by Public Works~~.

a. Rental. The affordability term for rental affordable housing set-aside units shall be at least 55 years from the issuance of the final certificate of occupancy by Public Works.

~~a~~b. For-sale. The initial sale of the affordable housing set-aside 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).

2. ~~Compatibility~~Comparability. Affordable housing set-aside units shall have the same number of bedrooms as the non-set-aside dwelling units. In a housing development with a variety of bedroom counts per dwelling unit, the percentage of affordable set-aside dwelling units with a particular number of bedrooms shall be equal to the percentage of non-set-aside dwelling units with the same number of bedrooms.

3. Location of Units. The affordable housing set-aside units and the density bonus dwelling units may be located in different geographic areas within the housing development.

4. Covenant and Agreement Required. A covenant and agreement ensuring the continuing availability of affordable housing set-aside units shall be recorded, pursuant to Section 22.166.070 (Covenant and Agreement).

5. Timing. All permits and entitlements, including the building permits, for the affordable housing set aside units shall be obtained prior to or concurrently with the permits and entitlements, including the building permits, for the non set-aside units.

...

SECTION 12. Chapter 22.121 is hereby added to read as follows:

Chapter 22.121 Inclusionary Housing.

Sections:

22.121.010 Purpose.

22.121.020 Definitions.

22.121.030 Applicability.

22.121.040 Application Requirement.

22.121.050 Affordable Housing Set-Aside.

22.121.060 Incentive and Waiver or Reduction of Development Standard.

22.121.070 Adjustment or Waiver of Inclusionary Requirements.

22.121.080 County Feasibility Assessment.

22.121.010 Purpose.

The purpose of this Chapter is to ensure the inclusion of affordable housing units in housing developments that meet certain criteria and encourage mixed-income communities.

22.121.020 Definitions.

Specific terms used in this Chapter are defined in Division 2 (Definitions), under "Affordable Housing and Senior Citizen Housing."

22.121.030 Applicability.

Notwithstanding any contrary provisions in this Title 22, the provisions of this Chapter, in conjunction with Chapter 22.166 (Housing Permits), apply to all housing developments, excluding mobilehome parks, and including projects to substantially rehabilitate and convert an existing commercial building to residential uses, or the substantial rehabilitation of an existing multifamily dwelling, as defined in section 65863.4 (d) of the California Government Code, where the result of the rehabilitation would be a net increase in available dwelling units, that meet all of the following:

A. Has at least five or more baseline dwelling units;

B. Is located in a submarket area, with the following exceptions:

1. Rental projects or condominium projects located in the South Los Angeles or Antelope Valley submarket areas; or

2. Rental projects located in the East Los Angeles/Gateway submarket area; and

C. Is not located within an area subject to an affordable housing requirement pursuant to a development agreement, specific plan, or local policy.

22.121.040 Application Requirement.

Except as specified otherwise, an Administrative Housing Permit (Section 22.166.040) is required for any housing development subject to this Chapter.

22.121.050 Affordable Housing Set-Aside.

A. Rental. If the project consists of rental units, the affordable housing set-aside units shall be provided at an affordable rent, as described in Table 22.121.050-A, below.

TABLE 22.121.050-A: INCLUSIONARY HOUSING REQUIREMENTS FOR RENTAL PROJECTS			
Option	*Affordability[1]*	*Set-aside*	*Set-aside (Small projects)[2]*
1	Average affordability[3] of 40% AMI or less	10%	5%
2	Average affordability[3] of 65% AMI or less	15%	7%
3	80% AMI or less	20%	10%
Notes: 1. Units shall be set aside for extremely low, very low, or lower income households. 2. Projects with less than 15 baseline dwelling units. 3. Calculations for the average affordability shall comply with Subsection C (Calculation), below.			

B. For-sale. If the project consists of for-sale units, the affordable housing set-aside units shall be provided at an affordable sale price, as described in Table 22.121.050-B, below.

TABLE 22.121.050-B: INCLUSIONARY HOUSING REQUIREMENTS FOR FOR-SALE PROJECTS			
Submarket Area	*Affordability[1]*	*Set-aside*	*Set-aside (Small projects)[2]*
Coastal South Los Angeles, South Los Angeles (excluding condominiums), East Los Angeles/Gateway	Average affordability[3] of 135% AMI or less	20%	10%
San Gabriel Valley		15%	7%
Santa Clarita Valley, Antelope Valley (excluding condominiums)		5%	-
Notes: 1. Units shall be set aside for moderate or middle income households.			

TABLE 22.121.050-B: INCLUSIONARY HOUSING REQUIREMENTS FOR FOR-SALE PROJECTS
2. Projects with less than 15 baseline dwelling units. 3. Calculations for the average affordability shall comply with Subsection C (Calculation), below.

C. Calculation.

1. Inclusionary Housing Requirement.

a. General. The inclusionary housing requirement shall be calculated using the baseline dwelling units exclusive of a manager's unit or units.

b. Mixed Tenure Project. Where a project consists of both rental and for-sale units, the inclusionary housing requirement shall apply to both rental and for-sale units. The requirement for each tenure shall be calculated separately using the baseline dwelling units under each tenure, exclusive of a manager's unit or units.

c. All calculations resulting in fractional numbers shall be rounded up to the next whole number.

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. 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.

D. Comparability.

1. Affordable housing set-aside units shall have the same number of bedrooms as the non-set-aside dwelling units. In a project with a variety of bedroom counts per dwelling unit, the percentage of affordable set-aside dwelling units with a particular number of bedrooms shall be equal to the percentage of non-set-aside dwelling units with the same number of bedrooms.

2. The affordable housing set-aside units shall be indistinguishable from the non-set-aside units in terms of exterior and interior appearance and overall quality of construction. Where reasonable, interior finishes may consist of less expensive materials and equipment, provided they are new, durable, and of good quality.

3. Affordable housing set-aside units shall have comparable access to building amenities as other non-set-aside units.

4. Affordable housing set-aside units shall not be overly concentrated in one area of the project, and shall be reasonably distributed throughout the project.

5. Affordable housing set-aside units in a common interest development or a single-family residential subdivision shall be for-sale only.

E. Duration of Affordability.

1. Rental. Except as specified otherwise in this Chapter, the affordability term for rental affordable housing set-aside units shall be in perpetuity.

2. For-sale. The initial sale of the affordable housing set-aside 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).

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

1. The required affordable housing set-aside units are not subject to Chapter 22.120 (Density Bonus);

2. The off-site parcel is located in an unincorporated area of the County and is one of the following:

a. Located within one-quarter mile of the principal project;

b. Located within an area designated as Highest, High, or Moderate Resource by the State Tax Credit Allocation Committee and State Department of Housing and Community Development. Where the principal project is also located in an area designated as Highest, High, or Moderate Resource, the off-site parcel shall be located in an area with the same or higher resource designation as the principal project;

c. 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

d. Developed as part of a community land trust;

3. The off-site parcel, its developable acreage, zoning and General Plan land use designation, is sufficient to permit the construction of the required set-aside units for the principal project;

4. The required affordable housing set-aside units for the principal project shall not count toward the affordable housing set-aside units required on said off-site parcel pursuant to this Chapter; and

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

a. The applicant shall submit a memorandum of understanding ("MOU") to the Los Angeles County Development Authority ("LACDA") for review prior to the approval of an Administrative Housing Permit (Section 22.166.040) application. The MOU shall include the agreed upon payment or compensation that the applicant will give to the partnering third-party developer to construct the set-aside units, with sworn affidavits from both parties;

b. Upon approval of the Administrative Housing Permit (Section 22.166.040) application, the Director shall notify the Commission of said approval with the following:

i. The location of the off-site parcel;

ii. The number of affordable housing set-aside units provided on the off-site parcel;

iii. The household income levels assigned to such set-aside units;

iv. The sizes (square footage) and number of bedrooms of such set-aside units; and

v. A copy of the MOU between the applicant and the partnering third-party developer; and

c. The approval of the Administrative Housing Permit (Section 22.166.040) application may be called for review by the Commission pursuant to Chapter 22.240 (Appeals).

G. Covenant and Agreement Required. A covenant and agreement ensuring the continuing availability of affordable housing set-aside units shall be recorded, pursuant to Section 22.166.070 (Covenant and Agreement).

H. Timing.

1. All permits and entitlements, including the building permits, for the affordable housing set-aside units shall be obtained prior to or concurrently with the permits and entitlements, including the building permits, for the non-set-aside units.

2. Where affordable housing set-aside units are provided off-site pursuant to Subsection F, above, such units shall obtain a certificate of occupancy from Public Works prior to the issuance of the final certificate of occupancy for the principal project.

22.121.060 Incentive and Waiver or Reduction of Development Standard.

A project with any middle income affordable set-aside shall be eligible for one incentive and one waiver or reduction of a development standard, subject to the following:

A. The project is not eligible to receive any incentive or waiver or reduction of development standard provided in Chapter 22.120 (Density Bonus);

B. Incentive. The granting of an incentive pursuant to this Section is subject to the following:

1. A Discretionary Housing Permit (Section 22.166.050), unless the findings specified in Section 22.166.040.C.1.a are satisfied, in which case an Administrative Housing Permit (Section 22.166.040) application is required; and

2. Said incentive shall not be used to request any density bonus or direct financial incentive, such as an exemption from, or a reduction in, the payment of any planning and zoning fees; and

C. Waiver or Reduction of Development Standard. The granting of a waiver or reduction of development standard is subject to a Discretionary Housing Permit (Section 22.166.050), unless the findings specified in Section 22.166.040.C.1.b are satisfied, in which case an Administrative Housing Permit (Section 22.166.040) application is required.

22.121.070 Adjustment or Waiver of Inclusionary Requirements.

Notwithstanding any other provision of this Chapter, the requirements of this Chapter may be adjusted or waived, in whole or in part, if the applicant demonstrates that applying the requirements of this Chapter would take property in violation of the United States or California Constitution, subject to the following:

A. Written request. The applicant shall bear the burden of presenting substantial evidence to support the adjustment or waiver. The request shall be submitted, in writing, at the time of initial application submittal. The request shall set forth the factual and legal basis for the claim and include financial and other information that the Director deems necessary to perform an independent evaluation of the applicant's rationale for the request.

B. Determination. The Director will consider the request and issue a written determination, subject to the following;

1. In making a determination, the Director may assume the following:

a. The applicant will benefit from density bonuses, incentives, waivers, or other concessions pursuant to this Chapter or Chapter 22.120 (Density Bonus); and

b. The applicant will provide the most economical inclusionary units feasible, meeting the requirements of this Chapter.

2. If the Director determines the requirements of this Section may be adjusted or waived, in whole or in part, then the inclusionary housing requirement(s) of the proposed housing development shall be adjusted or waived to reduce the

obligations under this Chapter, only to the extent necessary to avoid an unconstitutional result.

C. Appeal. The Director's determination may be appealed in the manner and within the time set forth in Chapter 22.240 (Appeals).

22.121.080 County Feasibility Assessment.

To ensure consistency with long term economic trends, the Department shall evaluate the appropriateness of the affordable housing set asides in Table 22.121.050-A and Table 22.121.050-B and evaluate the boundaries of the submarket areas every five years from the effective date of this Chapter. The evaluation may be conducted more frequently as deemed appropriate by the Director.

SECTION 13. Section 22.166.030 is hereby amended to read as follows:

22.166.030 Applicability.

This Chapter applies to projects that provide affordable housing or senior citizen housing and ~~are~~may be eligible to receive various benefits, including but not limited to: density bonuses, incentives, waivers or reductions of development standards, and permit streamlining pursuant to the State Density Bonus Law, as set forth in ~~S~~section 65915 of the California Government Code, as amended, or any other State laws or local ordinances or policies that aim to increase the production of affordable housing and senior citizen housing.

SECTION 14. 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 units, and as applicable, age restricted units and child care facilities, in compliance with this Chapter ~~and,~~ Chapter 22.120 (Density Bonus), or Chapter 22.121 (Inclusionary Housing). All Housing Permits without a covenant and agreement that are 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.~~

...

2. Rental Affordable Housing Set-Aside Units. When affordable housing set-asides 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:

a. Duration of affordability, ~~pursuant to Subsection B.1.a (Rental) of Section 22.120.050~~as specified;

...

3. For-Sale Affordable Housing Set-Aside Units. When affordable housing set-asides 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:

...

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 ~~S~~section 33334.2(e) of the California Health and Safety Code that promote home ownership.

...

SECTION 15. 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 shall be administered by the LACDA. The LACDA shall be responsible for verifying income eligibility, monitoring sales of affordable housing set-aside units to qualified buyers, conducting periodic site

inspections, and administering the annual certification of affordable housing set-aside units approved pursuant to this Chapter for the duration of the required term as specified in Chapter 22.120 (Density Bonus) or Chapter 22.121 (Inclusionary Housing).

SECTION 16. Section 22.300.020 is hereby amended to read as follows:

22.300.020 Application of Community Standards Districts to Property.

...

B. Additional Regulations.

1. Density Bonus ~~Exception~~or Inclusionary Housing. Notwithstanding any contrary provisions in this Volume II, any CSD regulations specified in Subsection A, above, may be waived or modified through a Housing Permit (Chapter 22.166), pursuant to Chapter 22.120 (Density Bonus) or Chapter 22.121 (Inclusionary Housing).

...

[2214010SCCC]

County of Los Angeles

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

Prepared by:

IMPACT SCIENCES

811 W. 7th Street
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Los Angeles, CA 90017

Prepared for:

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

October 2020

County of Los Angeles

Inclusionary Housing Ordinance

Addendum to the Certified Los Angeles County General Plan Update Final Environmental Impact Report

Prepared by:

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October 2020

TABLE OF CONTENTS

Chapter			Page
1.0	INTRODUCTION		1.0-1
	1.1	Overview	1.0-1
	1.2	Project Location	1.0-2
	1.3	Lead Agency and Address	1.0-2
	1.4	Contact Person and Phone Number	1.0-2
	1.5	Statutory Authority	1.0-2
	1.6	CEQA Guidelines Updates	1.0-4
	1.7	Background and Planning History	1.0-5
	1.8	Other Planning Projects that Implement General Plan Policies	1.0-6
	1.9	Mitigation Requirements	1.0-8
	1.10	Summary Comparison of Significant Impacts Identified in General Plan Update EIR Compared to Impacts of IHO Ordinance	1.0-14
	1.11	Incorporation by Reference	1.0-36
2.0	PROJECT DESCRIPTION		2.0-1
	2.1	Los Angeles County General Plan Update EIR	2.0-1
	2.2	Background	2.0-3
	2.3	Inclusionary Housing Ordinance Submarket Areas	2.0-4
	2.4	Approach to Analysis	2.0-5
	2.5	Project Characteristics	2.0-17
	2.6	Project Objective	2.0-19
	2.7	Discretionary Actions and Approvals	2.0-19
3.0	ENVIRONMENTAL ANALYSIS		3.0-1
	3.1	Aesthetics	3.0-2
	3.2	Agriculture and Forestry Resources	3.0-7
	3.3	Air Quality	3.0-11
	3.4	Biological Resources	3.0-17
	3.5	Cultural Resources	3.0-23
	3.6	Geology and Soils	3.0-28
	3.7	Greenhouse Gas Emissions	3.0-33
	3.8	Hazards and Hazardous Materials	3.0-35
	3.9	Hydrology and Water Quality	3.0-39
	3.10	Land Use and Planning	3.0-45
	3.11	Mineral Resources	3.0-47
	3.12	Noise and Vibration	3.0-49
	3.13	Population and Housing	3.0-53
	3.14	Public Services	3.0-55
	3.15	Recreation	3.0-58
	3.16	Transportation and Traffic	3.0-60
	3.17	Utilities and Service Systems	3.0-64
	3.18	Cumulative Impacts	3.0-69
4.0	REFERENCES AND PREPARERS		4.0-1
	4.1	References	4.0-1
	4.2	Preparers	4.0-1

LIST OF FIGURES

Figure		Page
2-1	Regional Vicinity	2.0-6
2-2	Unincorporated Areas of Los Angeles County	2.0-7
2-3	Los Angeles County Submarket Areas	2.0-8
2-4	Coastal South Los Angeles Submarket Area	2.0-9
2-5	South Los Angeles Submarket Area	2.0-10
2-6	East Los Angeles Gateway Submarket Area	2.0-11
2-7	San Gabriel Valley Submarket Area	2.0-12
2-8	Santa Clarita Valley Submarket Area	2.0-13
2-9	Antelope Valley Submarket Area	2.0-14

LIST OF TABLES

Table		Page
1-1	General Plan Update EIR Mitigation Measures	1.0-8
1-2	Summary of Impacts: General Plan Update EIR Impacts Compared to IHO Impacts	1.0-15
2-1	General Plan Residential Buildout Projections (by Planning Area)	2.0-2
2-2	Los Angeles County Unincorporated Areas RHNA Progress/Building Permit Activity	2.0-3
2-3	Estimated Number of Units Attributable to Four Housing Ordinances	2.0-15
2-4	Housing Permits Approved (2008-2019)	2.0-16
2-5	Inclusionary Housing Requirements for Rental Projects	2.0-18
2-6	Inclusionary Housing Requirements for For-Sale Projects	2.0-18

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 Inclusionary Housing Ordinance (IHO), 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 IHO 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 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, Project Description**, 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 certified 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 Inclusionary Housing Ordinance along with other ordinances to address the affordable housing needs in the unincorporated areas of the County. The IHO 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.

Affordable Housing Preservation Ordinance: The Affordable Housing Preservation Ordinance (AHPO) considers a variety of strategies, including the regulation of condominium conversions and mobile home park closures, and one-for-one replacement or "no net loss" policies. Affordable housing preservation seeks to maintain the supply of lower-cost housing to avoid displacement of tenants or the loss of affordable units due to new development.

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 Affordable Housing Preservation 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	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: • 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	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 (I0E-06), particulate matter concentrations would exceed 2.5 $\mu g/m^3$, 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.
AQ-3	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: • 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 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: • 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 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.
AQ-4	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: • Wastewater treatment plants • Composting, greenwaste, or recycling facilities • Fiberglass manufacturing facilities • Painting/coating operations • Large-capacity coffee roasters • Food-processing facilities 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.
Biological Resources	
BIO-1	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, 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 offsite 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 Angles 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 Angles 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. 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. 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.
Greenhouse Gas Emissions	
GHG-1	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.
Hydrology and Water Quality	
HYD-1	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.
Noise	
N-1	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.
N-2	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).
N-3	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.
N-4	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).
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.

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:
	• 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:
	  ◦ 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).

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.

	• 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 IHO ORDINANCE

This Addendum will consider whether the new housing units expected from the IHO 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 IHO.

Chapter 3.0 of this Addendum includes a detailed evaluation of environmental effects associated with the IHO, as compared to impacts identified in the General Plan EIR for each CEQA environmental factor area, organized in the same manner as the General Plan Update EIR. Anticipated inclusionary housing development under the IHO represents a small fraction of the total reasonably foreseeable development analyzed in the General Plan EIR. The General Plan Update EIR evaluated projected land use development (based on zoning capacity) in the County that would be constructed and implemented/occupied between 2013 (the General Plan Update EIR baseline year) and 2035. The IHO would facilitate development of affordable housing units. Affordable housing units represent a fraction of the total development anticipated in the General Plan Update EIR.

The IHO in combination with the existing Density Bonus Ordinance (DBO) could result in an increased number of larger projects than would otherwise occur without the IHO. An increase in units could occur because developers of market rate housing would be required to include affordable units and as a result, they may seek to make up for the loss of market rate units by building more total units consistent with the existing DBO. It is also possible that the IHO would inhibit development because of the requirements being considered too onerous, potentially leading to less development than would otherwise occur.

Therefore, it is not possible to determine what fraction, if any, of the units analyzed in the General Plan Update EIR could result from the IHO (i.e. as compared to what would occur without the IHO). In addition, not being able to determine the number of units that could result from the IHO means that it would also be speculative to try to identify where any new units could occur. While potential inclusionary housing areas are identified in the Project Description, whether an area that is identified in this document as meeting

the criteria for inclusionary housing 1) will be redeveloped and/or 2) will include developments that request a density bonus pursuant to existing incentives and concessions, is not known.

As detailed further in **Chapter 2.0, Project Description,** the IHO applies to both rental and for sale units within certain submarket areas of the County. It is anticipated that an increase in development under the IHO would likely occur in urbanized areas due to incentives, such as from the DBO. However, the IHO would apply to projects that are not subject to the DBO in the identified submarket areas (See **Chapter 2.0**). Therefore, the IHO would not exclusively apply to urbanized areas, nor would the IHO exclusively apply to multifamily residential units. For project's that do not take advantage of the DBO, the number of units developed would be the same as under a "business as usual" scenario, since the IHO, by itself, does not increase the number of units allowed to be built. The analysis in this Addendum addresses development likely to occur in urbanized areas as a result of the IHO in combination with the DBO, as well as development anticipated in the submarket areas within the County.

Table 1-2 below provides a summary of impacts as identified in the General Plan and analyzed in this Addendum.

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

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
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.** While the project could result in individual projects that are larger than without the IHO, development under the IHO would likely occur in the urbanized portion of the County (i.e., not in hillsides or ridgeline areas. Therefore, to the extent that the IHO would result in additional development it is anticipated that such development would be consistent with the strategies of the General Plan and would not increase development beyond the growth that is already anticipated evaluated from buildout under the General Plan Update EIR. Some impingement of views of scenic resources could occur, but overall impacts are anticipated to be less than significant. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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	**No impact.** The IHO would likely occur in urbanized areas that already have similar land uses and real estate markets and therefore the three scenic highways

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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 result from implementation of the General Plan with respect to substantial alteration of scenic resources within a designated scenic highway.	within Los Angeles County would not be impacted. Impacts under the IHO would be less than anticipated for the General Plan Update as a whole because individual projects are anticipated to be developed within urbanized areas and not in locations where any scenic routes could be impacted. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.** The IHO would apply to both rental and for-sale projects within certain submarket areas in the County, It is anticipated that most of the development would occur in urbanized areas. Furthermore, incentives from projects also subject to the DBO would be more likely to only apply to urbanized areas with zoning that permits multifamily and mixed uses. These areas tend to have visual character typical of urban or suburban environments. Individual projects are anticipated to be developed within urbanized areas and would be consistent with urban/suburban visual character. For projects that do not utilize DBO incentives, the IHO would not by itself increase the number of units that are allowed to be built. The General Plan goals and policies would remain in effect to lessen and mitigate any potential impacts. Therefore, the IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.** Individual projects developed in accordance with the IHO are anticipated to occur where development already occurs and where existing lighting is typical of urban uses. 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
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.	**Significant and Unavoidable.** The IHO only applies in zones that allow residential uses as the principal use and applies to projects of five or more units. Agricultural zoning, which would not change with the IHO, precludes apartment development. Even single-family affordable developments would require a site large enough to be subdivided into single-family lots that would meet the minimum lot size in farmland areas. Subdivisions would trigger a discretionary process with CEQA review, which would include mitigations if impacts to farmland are significant. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 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 IHO only applies in zones that allow residential uses as the principal use and applies to project of five or more units. The IHO would not involve the rezoning of farmland or any impacts to Williamson Act contracts. Therefore, the IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO only applies to projects of five or more units in zones that allow residential uses as the principal use. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 the IHO would apply in zones that allow residential uses, the IHO does not make any changes to the County's SEA Ordinance nor already permitted uses or densities. The IHO itself would not result in any additional development and only requires a set aside for affordable housing, impacts related to the loss of forest land would continue to be less than significant. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impact would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
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 IHO would not result in development that would result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. In addition, forest and farmlands are generally zoned in a way that would preclude multifamily projects. Therefore, forests and farmlands would not be significantly impacted. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 areas would exceed forecasts in the AQMP.	**Significant and Unavoidable.** The IHO would not increase the growth and development beyond what is anticipated from buildout of the General Plan. The IHO would not by itself increase the number of units allowed for development, as it would only require that developments set aside a percentage of affordable units. Since the release of the General Plan, 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 to exceed the AVAQMD's plan. The IHO would not be expected to increase the number of units beyond what was analyzed in the General Plan and impacts would not be greater than what was previously analyzed. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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, t 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	**Significant and Unavoidable.** As under the General Plan, construction of multiple projects simultaneously could result in total daily construction emissions exceeding regional thresholds and therefore emissions associated with construction could be significant. Mitigation Measure AQ-1, regulatory measures, and general plan goals and policies would reduce these impacts, but it is likely that some projects would exceed the relevant SCAQMD and AVAQMD criteria air pollutant thresholds. The IHO would not substantially change construction or operational air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	
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.** The IHO would not increase the growth and development beyond what is anticipated from buildout of the General Plan. As a result, the cumulative air quality emissions associated with the IHO were already accounted for within the General Plan Update EIR. The IHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
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 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.	**Less than Significant with Mitigation.** The IHO is only applicable to residential and mixed-use projects. As a result, the IHO would not generate new sources of mobile or stationary-source TAC emissions typically associated with industrial or commercial processes. However, sensitive receptors may be placed near existing TAC sources (which as an impact of the environment on the project is not an impact under CEQA). The General Plan goals and policies as well as Mitigation Measure AQ-3 would continue to apply to projects subject to the IHO and impacts would be reduced to a less than significant level. The IHO would not substantially change impacts on sensitive receptors ass compared to those identified for the General Plan Update; no new or greater impacts would occur.
Create objectionable odors.	**Less than Significant with Mitigation.** The General Plan Update EIR concluded that industrial land uses associated with the General Plan could create objectionable	**Less than significant with Mitigation.** The IHO would not encourage the development of industrial land uses that could create objectionable odors. Residential use is not associated with odor

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	nuisance and Mitigation Measure AQ-4 would reduce this impact to a less than significant level. The IHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Biological Resources		
Effect on candidate, sensitive, or special status species.	**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.	**Significant and Unavoidable.** The IHO would not make changes to the SEA designations or policies. The IHO would apply to areas where residential use is the primary use and most likely would occur within urban areas. Generally, these areas 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. However, as determined in the General Plan EIR, there would still be the potential for development, including projects subject to the IHO, to have indirect impacts on special status species through loss of common (i.e. non-sensitive) habitats. These impacts would remain significant and unavoidable. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Effect on riparian habitats, other sensitive natural communities.	**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.	**Less than Significant.** The IHO would apply in residential zones generally within urban areas. Sensitive areas have building requirements and discretionary permit review processes to protect the most sensitive natural communities in the unincorporated areas. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Effect on protected wetlands.	**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.	**Less than Significant.** The IHO 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. The unincorporated area of Los Angeles County contains areas with coastal wetlands, drainages, marshes and vernal pools. Any impacts related to implementation of the IHO to these areas have already been evaluated by the General Plan. For waterways in the unincorporated areas that are note located in special management areas, the General Plan includes polices to preserve wetlands and streambeds. In addition, where state and federal agencies are involved in the review and permitting of projects in these areas when necessary. Therefore, the IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
Potential to interfere with movement of wildlife species.	**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.	**Less than Significant.** 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. The IHO would only affect residentially zoned areas that allow more than five units, and therefore in general would not affect areas that provide wildlife linkages or nursery sites. The IHO would not increase development beyond what is already anticipated under the General Plan. Therefore, the IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Potential to conflict with any local policies protecting biological resources, such as a tree preservation ordinance.	**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.	**Less than Significant.** There are oaks and other unique native trees within the unincorporated areas of Los Angeles County. Many of them exist within SEAs or sensitive coastal habitat areas, which are not likely to be subject to the IHO. The removal of oak trees requires appropriate permits and approvals through the Los Angeles County Department of Regional Planning, such as Oak Tree Permits. Therefore, the IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.** 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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	**Less than Significant with Mitigation.** It is not possible to determine exactly where development subject to the IHO would occur. The policies within the General Plan 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. Further any project that includes an historical resource, as defined by PRC Section 21084.1 that meet PRC 5024.1(g) as potentially eligible, would require discretionary review to

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	ensure the development meets Secretary of Interior Standards for Rehabilitation or Reconstruction. 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Archaeological Resources.	**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.	**Less than Significant with Mitigation.** The IHO would generally be expected to apply in urban areas where sites are already developed, and impacts would not be substantial since land is already disturbed and resources already impacted. 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 California Public Resources Code Section 21083.2. California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e) address how unexpected finds of human remains are to be handled. In addition, mitigation measures identified in the General Plan EIR would apply to development under the IHO. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Unique Paleontological Resources.	**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.	**Less than Significant with Mitigation.** The IHO would generally be expected to apply in urban areas where sites are already developed and substantially disturbed, and impacts would not be expected to occur. In cases where undeveloped parcels are found to contain paleontological resources, or parcels that are adjacent to paleontological resources, Mitigation Measures CUL-4 and CUL-5 would continue to ensure impacts are reduced to a less than significant level. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Human remains.	**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	**Less than significant.** Projects subject to the IHO would be required to comply with Public Resources Code Section 5097.98 as well as the California Health and Safety Code (Sections 7050.5, 7051, and 7054). The IHO

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	would not substantially change impacts as compared to those identified for the General Plan Update; 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.** Development under the IHO would not exacerbate existing conditions. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.** Residential projects subject to the IHO 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 IHO projects would also have to comply with NPDES requirements as appropriate. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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, 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	**Less than Significant.** Development under the IHO 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 IHO would not exacerbate existing soil conditions. The IHO would not substantially change impacts as

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	compared to those identified for the General Plan Update; 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 IHO 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 IHO will still be required to comply with regulations applicable to OWTS. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 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	**Less than Significant** Since the release of the General Plan, 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, 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	
Conflict with applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.	**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.	**Less than Significant.** The IHO would e consistent with the statewide GHG reduction policies evaluated within the General Plan. 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 IHO is consistent with the CCAP in promoting housing near transit through the implementation of density bonus. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
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.** The IHO would result in additional affordable housing in the unincorporated County. Construction of new housing could require the demolition of existing buildings which 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. Furthermore, projects subject to the IHO are residential projects that do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the IHO would not involve substantial transport, use, and disposal of hazardous materials. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO would not substantially change impacts as compared to those identified for the General Plan

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
		Update; 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.** The IHO by itself would not increase the number of units that are allowed to be built since it only required a set aside of affordable units for applicable projects. The IHO would not make changes to County policies, regulations, and General Plan goals that are intended to identify and address potential airport hazards. All projects would continue to be subject to existing FAA regulations, County policies and regulations, and General Plan goals and policies. As such 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.** Projects subject to the IHO would be required to implement applicable regulations as well as General Plan goals and policies to reduce the risk of impaired implementation or physical interference of an adopted emergency response plan or emergency evacuation plan. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Wildfire risk.	**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.	**Less than Significant.** Projects subject to the IHO constructed in these areas as a result of this ordinance would be regulated by existing Health & Safety Code, Building Code and Fire Code requirements. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Hydrology and Water Quality		
Violate water quality standards or waste discharge requirements.	**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.	**Less than Significant.** Projects subject to the IHO 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 policies. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
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.** The IHO requires the set aside of affordable housing and is not expected to result in new development that would otherwise not occur. Therefore, it is unlikely there would be any increase in impervious surface as a result of the IHO. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.** Projects subject to the IHO are required to mimic predevelopment hydrology, evapotranspiration, and rainfall harvest as required by the MS4 permit. As a result, the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.** Projects subject to the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.	**Less than Significant.** If a project subject to the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 significant.	**Less than Significant.** The IHO would only apply in residential areas and would be consistent with the existing zoning and the General Plan land use designation. Any residential projects subject to IHO that are not consistent with zoning or the General Plan land use designation (and therefore with the potential to divide an existing neighborhood) would be subject to the County process for zone changes or General Plan amendments. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
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.** The IHO would be consistent with local land use plans, goals, and policies calling for more affordable housing, transit serving development, mixed-use development served by high-quality transit. The IHO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by expanding the supply of affordable housing. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 conservations plans, such development would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.	**Less than Significant.** Projects subject to the IHO developed in areas covered by conservation plans would be required to comply with provisions of those plans. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 projects subject to the IHO could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the IHO are currently in use as mineral extraction. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or 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 IHO is not likely to affect mineral resource zones or otherwise result in the loss of locally important mineral resources. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 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	**Less than Significant.** Construction noise 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 IHO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. Projects subject to the IHO would be residential and mixed-use developments which do not generate significant amounts of noise compared to other

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	types of uses. Traffic associated with development under the IHO would be within the assumptions made and analyzed in the General Plan Update EIR. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Exposure of persons to or generation of excessive groundborne vibration or noise levels	**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.	**Less than Significant with Mitigation.** Construction of projects subject to the IHO may 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 EIR. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.** Due to their size, most projects would result in a less than significant contribution to traffic and therefore a less than significant permanent increase in noise levels. Projects would be required to implement Mitigation Measure N-2 and are required to achieve interior noise limits. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.** Title 12 of Los Angeles County Code regulates construction noise and establishes acceptable noise exposure standards for different land use types. Mitigation Measure N-1 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 traffic dominated. 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 not exceed 5 dBA above ambient noise levels. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Proximity to public or private airport	**Less than Significant.**	**Less than Significant.**

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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).	The IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
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 IHO would require affordable housing set asides in applicable zones and submarket areas. If a project subject to the IHO elects to apply the DBO provisions, then additional residential units may be constructed. However, it is not anticipated to result in a substantial increase in population compared to that anticipated in the General Plan EIR, and the effects of the IHO on its own (without the DBO) would be minimal and well within the assumptions of the General Plan. The IHO itself would not increase housing development but would require low income units be implemented within a development project. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO would not result in the permanent displacement of substantial numbers of existing housing units, either market rate or affordable. The purpose of the IHO is to increase affordable housing supply in the unincorporated areas of Los Angeles County. In the event that a site is redeveloped, and existing housing is replaced, the IHO would allow the applicant to elect for a density bonus contingent on low income housing and therefore provide more residential units. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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	**Less than Significant with Mitigation.** Projects subject to the IHO are not expected to increase population beyond what is already anticipated under the General Plan. Implementation of Mitigation Measures PS-1, PS-2,

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	would reduce impacts to a less than significant level.	PS-3, and PS-4 would reduce impacts to a less than significant level.
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 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.	**Less than Significant.** The IHO would not induce population growth within the County, rather it would serve the existing residents by adding affordable units to the housing stock. All new development would be subject to the Quimby Act and local policies and guidelines regarding the provision of parks and recreation facilities. Therefore, the IHO would not substantially increase the use of existing neighborhood and regional parks and recreational facilities such that substantial physical deterioration would be substantially exacerbated. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Require construction of recreational facilities that might have an adverse effect on the environment.	**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.	**Less than Significant.** The IHO would not induce population growth and would add to the affordable housing stock for the County. Projects subject to the IHO would comply with existing federal, state, and local regulations regarding parks and recreational facilities. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Transportation and Traffic		
Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system;	**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,	**Significant and Unavoidable.** The IHO would require the set aside of affordable housing for projects of five or more units. Similar to the General Plan, it is not possible to determine exactly where inclusionary housing development would occur. When combined with the DBO,

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
Conflict with an applicable congestion management program.	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.	projects subject to the IHO could increase the number of units compared to what is allowed under the zoning. In general, projects that make use of the DBO are located in urbanized areas often in close proximity to transit and walkable areas. The IHO would not substantially change traffic impacts as compared to those identified for 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 IHO would allow projects in the vicinity of an airport, 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 in accordance with the IHO is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The IHO 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 IHO would have no impact related to design feature hazards. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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	**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

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; n 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 in accordance with the IHO would be located within residential areas and remain consistent with the underlying zoning for the site. In combination with the DBO, projects subject to the IHO could increase the unit count of individual projects. Projects would continue to be consistent with General Plan policies. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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	**Less than Significant.** Development associated with the IHO would be well within the expected growth for the

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
	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.	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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
New water or wastewater treatment facilities; Determination of capacity.	**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.	**Less than Significant.** Development in accordance with the IHO would be likely to occur in urbanized areas zoned for residential development and would be expected to connect to the existing sewer lines. The size of individual projects is anticipated to be relatively small (although incrementally bigger than they would otherwise have been as a result of the potential for increased use of the existing DBO), resulting in minor impacts to the sewer system in the vicinity of each site. Development in accordance with the IHO would be required to comply with all applicable County regulations. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance IHO
Water supply.	**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 that impacts would be significant and unavoidable.	**Less than Significant.** The IHO does not increase development beyond what is already anticipated under buildout of the General Plan. 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 in infill areas 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO does not increase development beyond what is already anticipated under buildout of the General Plan. It is unlikely to result in projects that would significantly impact landfill capacity. Inclusionary housing developments are likely to be located in areas with existing residential uses that are already served by existing landfills. Projects that obtain planning and building approvals would be consistent with solid waste regulations. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

As shown in the table above, development associated with the IHO 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 those analyzed in the General Plan Update.

Because total inclusionary housing development in the County represents a very small component of the anticipated increase in development analyzed in the General Plan Update EIR, impacts would be less than those identified in the General Plan Update EIR. Therefore, as summarized in Table 1-2 and analyzed in more detail in **Chapter 3.0**, the IHO 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 IHO 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 IHO.

1.11 INCORPORATION BY REFERENCE

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

- Los Angeles County General Plan Update Final Program Environmental Impact Report, certified October 7, 2015.
- An ordinance amending Title 22 – Planning and Zoning of the Los Angeles County Code to establish an Inclusionary Housing Program in the unincorporated areas of Los Angeles County

The Inclusionary Housing Ordinance is available on the County's website at: http://planning.lacounty.gov/inclusionary

The General Plan Update Final 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 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, the 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 the County is shown in **Figure 2-1, Regional Vicinity.**

The area for the Proposed Project includes only the unincorporated areas of the County (unincorporated areas), approximately 65 percent of the total land area in the County falls within the unincorporated areas. The unincorporated areas in the northern portion of the 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 the 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 General Plan 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).

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

One major policy change was to encourage more housing. To do this, the General Plan Update included changes to General Plan land use policy maps and zoning maps to encourage high density housing and commercial-residential mixed uses along major commercial corridors within Transit Oriented Districts (TODs). The Mixed Use (MXD) zone was applied to some of the major corridors designated Mixed Use (MU).

Although the General Plan Update includes policies to encourage high-density housing, it may not do enough to encourage the development of affordable housing in tandem with market rate housing. The purpose of the Inclusionary Housing Ordinance (IHO) is to increase the affordable housing stock in the unincorporated areas and also to create mixed-income communities that add vibrancy to neighborhoods.

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 Update 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] Residents are experiencing a shortage of 551,807 affordable homes for households earning less than $41,500 for a four-person household.[3] The County's lowest-income renters spend about 70 percent of their income on rent, which leaves only 30 percent of their income for daily essentials such as food, transportation, health expenses, and other needs.[4]

Housing need in the 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.[5] **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 the County. Given past 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 Year 1	2015 Year 2	2016 Year 3	2017 Year 4	2018 Year 5	2019 Year 6	2020 Year 7	2021 Year 8	Total Units to Date	Total Remaining RHNA
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 Maxwell, C. (February 24, 2017). New Study Finds Los Angeles County Needs 551,807 Affordable Homes. https://chpc.net/resources/newsletter-new-study-finds-los-angeles-county-needs-551807-affordable-homes/

4 Los Angeles County Rents in Crisis: A Call for Action, California Housing Partnership Corporation (May 2017) http://1p08d91kd0c03rlxhmhtydpr.wpengine.netdna-cdn.com/wp-content/uploads/2017/05/Los-Angeles-County-2017.pdf

5 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 IHO. Inclusionary housing ordinances have been adopted in more than 500 jurisdictions in the United States and can be an effective strategy for creating mixed-income housing projects and mitigating economic segregation by dispersing affordable housing throughout the community. The primary focus of an inclusionary housing ordinance is the provision of affordable housing units with market-rate housing developments. In California, the financial impacts associated with inclusionary housing requirements can potentially be offset by the density bonus that is mandated by Government Code sections 65915-65918 (Section 65915) and implemented through the County's Density Bonus Ordinance.

On February 20th, 2018, the County Board of Supervisors directed DRP to prepare an inclusionary housing ordinance to assist addressing the affordable housing need in the unincorporated areas. The purpose of the IHO is to ensure production of affordable units in new development by establishing affordable housing set-aside requirements on residential projects that meet certain criteria. These requirements are set at a level that can be supported on a financially feasible basis, as determined through an economic feasibility study.

2.3 INCLUSIONARY HOUSING ORDINANCE SUBMARKET AREAS

An Inclusionary Housing Feasibility Analysis[6] was conducted to evaluate the economic tradeoffs associated with new inclusionary housing requirements. The study conducted a series of pro forma analyses of prototype ownership and rental apartment projects in six submarket areas to determine what affordable unit set-asides and range of in-lieu fees can be supported on a financially feasible basis without adversely deterring future development.

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 determined to ensure that individual unincorporated areas were entirely located within one submarket area. The IHO is proposed to apply to housing developments that are located within

6 Keyser Marson Associates, Inclusionary Housing Analysis (2018), available at: http://planning.lacounty.gov/assets/upl/project/housing_la_ahap_appendixE.pdf

submarket areas as described above except for rental units or condominium units located in the South Los Angeles or Antelope Valley submarket areas, and rental units in the East Los Angeles/Gateway submarket area, as the feasibility analyses determined that these markets were not feasible for the IHO.

- Coastal South Los Angeles
- East Los Angeles/Gateway (SFR and condo only)
- South LA (SFR only)
- San Gabriel Valley
- Santa Clarita Valley
- Antelope Valley (SFR only)

The submarket areas are shown in **Figures 2-3** through **2-9.**

Other than specifying that development subject to the IHO would apply to the mapped submarket areas, the IHO does not identify specific development projects or specific locations for development. Some sites are considered to have higher potential to develop with inclusionary housing, but inclusionary housing development can occur anywhere, within a submarket area, that is zoned for residential development.

To ensure consistency with long term economic trends, the County will evaluate the boundaries of the submarket areas every five years from the effective date of the IHO.

The IHO would not apply in any area subject to a development agreement or specific plan with an affordable housing requirement.

2.4 APPROACH TO ANALYSIS

DRP sought State funding assistance with the IHO, By Right Housing Ordinance, ISHO, and AHPO (see **Chapter 1.0, Introduction,** for a description of these other planning efforts). DRP sought a grant authorized under the Planning Grants Program (PGP) provisions of SB 2 (Chapter 364, Statutes of 2017). For purposes of the grant application and the County's affordable housing projections under these proposed four ordinances, DRP estimated the number of units that the four ordinances together could be expected to provide. Estimates of units were made by category: supportive, affordable, and market rate housing. DRP based their estimate on the previous five years of approved housing permits for each of the categories. As a result, DRP estimated that the number of units would increase by a total of about 92 percent compared to the number of units approved in the years 2014 to 2018, as shown in **Table 2-3** below.

Figure 2-1, Los Angeles County Regional Vicinity

Figure 2-2, Los Angeles County Unincorporated Areas

Figure 2-3, Los Angeles County Submarket Areas

Figure 2-4, Coastal South Los Angeles Submarket Area

Figure 2-5, South Los Angeles Submarket Area

Figure 2-6, East Los Angeles Gateway Submarket Area

Figure 2-7, San Gabriel Valley Submarket Area

Figure 2-8, Santa Clarita Valley Submarket Area

Figure 2-9, Antelope Valley Submarket Area

Table 2-3
Estimated Number of Units Attributable to Four Housing Ordinances

	Baseline Units Approved 2014 to 2018	Anticipated Number of Units after Implementation of Four Housing Ordinances (Over 5-years)	5-Year Increase Attributable to Ordinances	Annual Increase Attributable to Ordinances	Percentage Increase
Supportive	80	480	400	80	500
Affordable	715	1,308	593	118.6	83
Market Rate	1,010	1,675	665	133	66
Total	1,805	3,463	1,658	331.6	92

Note: DRP assumed: 1) the by-right ordinance would increase residential building activity by 50 percent, 2) the IHO would result in 15 percent set-aside on all new residential projects with more than 10 units; 3) there would be greater application of the Density Bonus ordinance, 4) the ISHO would increase supportive housing by 30 percent and 4) the number of supportive units created by motel conversions based on a 20 percent conversion rate of non-corporate and confirmed motels.
Source: SB 2 Planning Grants Program Application, March 28, 2019

However, this estimate of the number of units that could be developed was based on a period of relatively low growth in the County.

In addition to the data reviewed for the grant application, a review of recent housing permit data was conducted to determine the overall development trend in the unincorporated areas over a longer period of time. Development is generally subject to a typical boom and bust cycle (2018-2019 representing a relative boom year), the overall trend in the unincorporated areas has been an increase in the number of permitted units since 2008. **Table 2-4, Housing Permits Approved (2008-2019)**, shows the number of housing permits and units approved since the approval of the Density Bonus Ordinance. While use of the Density Bonus Ordinance had been slow to start, its use has been increasing and the County now has approved 2,168 density bonus units. It is possible, that the IHO ordinance will encourage increased use of the Density Bonus Ordinance potentially resulting in an increase in the number of projects constructed in the unincorporated areas. It is also possible that individual projects could be slightly larger than without the IHO due to the Density Bonus Ordinance. However, the County does not have enough data to make detailed analytic assumptions about the number or size of projects that might be developed as a result of the IHO. It is also possible the IHO could act as a disincentive to growth and could depress development at least until developers become accustomed to the change.

Table 2-4
Housing Permits Approved (2008-2019)

Total Housing Permits Approved:	46
Total Number of Units Approved:	2,949
Total Units from Projects with Affordable Housing Set-Aside:	2,168
Extremely Low:	80
Very Low:	677
Lower:	620
Moderate:	19
Market-Rate:	772
Total Units from Projects with Senior Citizen Housing (Market-Rate):	781
Senior:	446
Non-Senior:	335

Source: County of Los Angeles Housing Unit permit data, 2020

Given the increased focus on streamlining housing approvals and accelerating housing production at all levels of government, this CEQA document assumes the IHO ordinance (together with the other three ordinances aimed at increasing affordable housing as addressed in the SB 2 Grant Application discussed above) could result in more units than estimated by DRP in the SB 2 Grant Application. Therefore, this Addendum, rather than basing the analysis on the potential number of units that could be developed based on past trends, follows the approach used in the analysis of the General Plan Update in the General Plan Update EIR. The General Plan Update EIR identifies forecast housing development based on zoning use capacity.

This Addendum provides that the Proposed Project (together with other ordinances aimed at increasing affordable housing, see **Chapter 1.0, Introduction**), would result in some fraction of the forecast development identified and evaluated in the General Plan Update EIR. It is not anticipated that the IHO would add to the number of units already evaluated in the General Plan Update EIR since the General Plan Update forecast growth based on capacity, and far exceeds the SCAG growth forecast, and the IHO does not change the population forecast or zoning capacity as analyzed in the General Plan Update. As to the zoning capacity, the IHO does not directly add units rather it sets aside a portion of units to be affordable for certain proposed housing developments in certain areas. As to the population forecast, the IHO applies only within the designated submarket areas, which are a subset of the entire General Plan area, and therefore a subset of the entire General Plan Update forecast.

Given the complexity associated with housing development at the present time, the precise number and location of units anticipated to result from each of the housing ordinances (or all of them together) is not possible to forecast with any reasonable approach. Such an exercise would be entirely speculative. Therefore, this addendum takes a comparative qualitative approach to the analysis of the Proposed Project.

Total inclusionary housing development in the County, even if it encouraged increased use of the DBO, would represent a small component of the total anticipated forecast development analyzed in the General Plan Update EIR (a total increase of 358,931 housing units – see **Table 2-1**).[7]

2.5 PROJECT CHARACTERISTICS

The IHO requires all housing development[8] projects with five or more units, to set aside a percentage of units for affordable housing. As described below, 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[9] 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.

Under the IHO, project applicants would first need to determine the affordability of units (See **Table 2-5, Inclusionary Housing Requirements for Rental Projects,** and **Table 2-6, Inclusionary Housing Requirements for For-Sale Projects**) for either rental or for sale units. Once the average affordability of units has been determined for a project, the applicant can then identify the corresponding set-aside under the Density Bonus Ordinance. The Density Bonus Ordinance set asides are provided in Table 22.120.050-A Affordable Housing Set-Asides and Density Bonuses. To calculate the number of units required to be affordable, the baseline is the proposed project, exclusive of a manager's unit or units, before the application of any density bonus.

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7 Environmental impacts associated with the update to DBO were analyzed in a Negative Declaration dated June 28, 2018.

8 As defined in Los Angeles County Code section 22.14.100, including but not limited to those projects to substantially rehabilitate and/or convert existing buildings for residential use.

9 The County's Density Bonus Ordinance is available online at: http://planning.lacounty.gov/assets/upl/project/density-bonus-ordinance-20191025.pdf

If a project consists of rental units, the affordable housing set-aside units would be required to be provided at an affordable rent, as described in **Table 2-5, Inclusionary Housing Requirements for Rental Projects**, below.

Table 2-5
Inclusionary Housing Requirements for Rental Projects

Option	Affordability[1]	Set-aside	Set-aside (Small projects)[2]
1	Average affordability of 40% AMI or less	10%	5%
2	Average affordability of 65% AMI or less	15%	7%
3	80% AMI or less	20%	10%

Notes:
1. Units shall be set aside for extremely low, very low, or lower income households.
2. Small projects are defined as housing developments with less than 20 baseline dwelling units.

If the project consists of for-sale units, the affordable housing set-aside units would be provided at an affordable sale price, as described in **Table 2-6, Inclusionary Housing Requirements for For-Sale Projects**, below.

Table 2-6
Inclusionary Housing Requirements for For-Sale Projects

Submarket Area	Affordability[1]	Set-aside	Set-aside (Small projects)[2]
Coastal South Los Angeles, South Los Angeles (SFR only), East Los Angeles/Gateway	Average affordability of 135% AMI or less	20%	10%
San Gabriel Valley		15%	7%
Santa Clarita Valley, Antelope Valley (SFR only)		5%	-

Notes:
1. Units shall be set-aside for moderate or middle- income households.
2. Small projects are defined as housing developments with less than 20 baseline dwelling units.

Every project of five units or more will be subject to the IHO and thereby qualify for density bonus. As described above, the IHO is designed to work in tandem with the Density Bonus Ordinance and is inclusive of the affordable housing requirement set aside provided in the Density Bonus Ordinance. That is, there is no additional requirement for affordable housing if an applicant seeks a density bonus. However, an

applicant can elect to accept a smaller or no density bonus. For projects that are 150 percent of AMI, although there is no allowance for additional units, it is proposed that applicants be able to seek one incentive and one waiver for certain development modifications (i.e., height, setback, required parking, etc.)

2.6 PROJECT OBJECTIVE

The objective of the Project is to ensure the inclusion of affordable housing units in housing developments that meet certain criteria and encourage mixed-income communities.

2.7 DISCRETIONARY ACTIONS AND APPROVALS

The following actions by the County will be required in order to implement the IHO:

- Approval of this Inclusionary Housing Project Addendum
- Adoption of the Proposed Inclusionary Housing Ordinance to amend County Code Sections (22.14.010, 22.14.090, 22.16.030, 22.18.030, 22.20.030, 22.24.030, 22.26.030, 22.46.030, 22.120.030, 22.120.100, 22.120.050, 22.166.030, 22.166.070, 22.166.080, 22.300.020., and addition of Chapter 22.121)

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 Inclusionary Housing Ordinance 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 section 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 Inclusionary Housing 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 IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

It is anticipated that the IHO would likely result in development in already urbanized areas and therefore would not result in substantial development that would impact scenic vistas, including views along a scenic highway or scenic corridor. The IHO would not change the location that development would occur, nor would it increase development that is anticipated to occur under buildout of the General Plan Update. There is potential for the IHO to increase the number of either taller and/or larger (in massing) projects than would occur without the IHO because of the potential for the IHO to work in tandem with existing incentives in the existing Density Bonus Ordinance (DBO). The DBO allows applicants to use a density bonus (and/or other incentives. While the project could result in individual projects that are larger than they could have been in the past, the density bonuses in the DBO would be difficult to implement within SEAs or Hillside Management Areas. Therefore, due to DBO incentives and market factors, development subject to the IHO that takes advantage of the DBO incentives is anticipated to occur in the urbanized portion of the County (i.e., not in hillsides or ridgeline areas). It is also possible that the IHO could inhibit

development as a result of requirements being considered too onerous, potentially leading to less development than would otherwise occur. To the extent that the IHO would result in additional development it is anticipated that such development would be consistent with the strategies of the General Plan Update and would not increase development beyond the growth that is already evaluated in the General Plan Update EIR. Some impingement of views of scenic resources could occur, but overall impacts are anticipated to be less than significant. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

As discussed in the Project Description, the IHO could work in tandem with the DBO. The DBO provides incentives that allow for larger projects with the provision of affordable housing. It is possible that the IHO combined with the DBO could lead to an increased number of individual projects that could be larger in terms of scale and massing. It is also possible that the IHO would inhibit development because of the requirements being considered too onerous, potentially leading to less development than would otherwise occur.

Density bonuses would be difficult to utilize in Very High Fire Hazard Severity Zones, Significant Ecological Areas, Hillside Management Areas, or sensitive habitat areas in the Coastal Zone. County scenic highways, routes, drives, and scenic elements identified in the Santa Monica Mountains Local Coastal Program are largely located within or next to these areas, which have development standards and permitting requirements that are intended to protect people, property, and biological resources. In addition, these areas are generally zoned for low density single-family development, where it would be difficult to utilize a density bonus or IHO which only applies to projects of five or more units.

Further, the IHO only applies in residential projects within the IHO submarket areas, none of which include the above listed scenic highways. Therefore, the four scenic highways listed above would not be impacted. Impacts under the IHO to other eligible scenic highways would be less than those anticipated for the General Plan Update because individual projects are anticipated to be developed within urbanized areas and not in locations where any of these routes could be impacted. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur. The General Plan EIR found impacts would be less than significant.

(c) Does IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

The IHO requires project with five or more units, within the selected submarket areas to set aside a portion of units for affordable housing. As noted above, the IHO could work in tandem with the DBO and result in a greater number of larger projects than otherwise might occur. The IHO could result in more housing that does not conform to height or setback limitations than would otherwise occur. Although it is also possible that the IHO would inhibit development because of the requirements being considered too onerous, potentially leading to less development than would otherwise occur.

The IHO is anticipated to apply to projects in areas with residential zoning. The IHO would not be expected to increase density independent of the DBO. Where the DBO could be utilized, these areas tend to have visual character typical of urban or suburban environments. Projects that make use of the DBO to modify development standards are required to meet the findings for incentives or waivers from development standards as applicable. These findings stipulate that the incentive or waiver would not have a specific adverse impact upon the physical environment. Projects that do not meet these findings are subject to a discretionary review process, which require project-specific environmental analysis. In cases where the IHO applies to projects that do not utilize DBO incentives, there would be no increase in the use or density of the project, as the IHO would only require that the project set aside affordable housing units and does not allow for additional density beyond what the zoning allows on its own.

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 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 IHO would not substantially

change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

Development under the IHO would be limited to the submarket areas defined in the ordinance, including the Antelope Valley, Coastal South Los Angeles, East Los Angeles/Gateway, San Gabriel Valley, and Santa Clarita Valley. Individual projects could introduce new lighting sources when located near industrial, warehouse, residential, commercial, and mixed-use land uses. However, individual projects developed in accordance with the IHO are anticipated to occur where development already occurs 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 IHO does not apply to the Santa Monica Mountains. Development of individual projects that are subject to the IHO 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 IHO 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 IHO in combination with the DBO could lead to a greater number of larger projects than would otherwise have occurred without the IHO. 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 IHO would substantially change impacts as compared to those identified for the General Plan Update EIR; no new or greater impacts would occur.

3.2 AGRICULTURE AND FORESTRY RESOURCES

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO only applies in zones that allow residential uses as the principal use and applies to projects of five or more units. Single family developments are allowed in the agricultural A-1 and A-2 zones. However, the IHO would not change the allowable uses or increase the number of units and the IHO would only apply to projects large enough to accommodate a subdivision of at least five lots. Impacts to the Antelope Valley Planning Area would remain significant as discussed in the General Plan Update EIR. The IHO

would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would require development projects to set aside affordable units for applicable projects. As described above, the IHO only applies in zones that allow residential uses as the principal use and applies to projects of five or more units. Agricultural zoning, would not be changed under the IHO and the IHO would not increase the density within these areas. Therefore, impacts to Williamson Act contracts as a result of the development in accordance with the IHO would not substantially change as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

As described above, the IHO only applies to project of five or more units in zones that allow residential uses as the principal use. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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. These zones permit single-family homes but not multifamily homes. In order to qualify for

a density bonus, a project must have at least five units pre-bonus, making the use of the IHO in conjunction with the DBO in these areas unlikely due to the required lot sizes. While the IHO would apply in zones that allow residential uses, the IHO itself would not change any allowable land uses or result in any additional development as it only requires a set aside for affordable housing for projects with five or more units. Therefore, the density of projects would not change and impacts related to the loss of forest land would remain less than significant. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impact would occur.

(e) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

The IHO would not result in development that would result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Forests and farmland in the County are relatively isolated from urban areas. Development under the IHO is anticipated to substantially occur in urbanized areas of the County, especially where it is used in conjunction with the DBO. The IHO itself would not change any allowable land uses or result in any additional development as it only requires a set aside for affordable housing for projects with five or more units. Therefore, forests and farmlands would not be significantly

impacted. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.3 AIR QUALITY

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would require applicable developments within certain planning areas to set aside affordable housing units. The IHO 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. The IHO alone would not result in any substantial increase in housing as it only requires applicable development to set aside a portion of development for affordable housing. When combined with density bonus there is the potential for larger (in term of units) projects to be constructed. Density bonus projects tend to be multifamily and located in infill areas. As such,

the IHO would not be expected to increase the number of units beyond what was analyzed in the General Plan Update. Furthermore, as stated above, under the IHO alone, there would be no increase in the use or density of an individual project, as the IHO would only require that the project set aside affordable housing units and does not allow for additional density beyond what the zoning allows on its own. While the IHO could incentivize increased use of the DBO, impacts would not be greater than those evaluated in the General Plan EIR.

The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur. The General Plan EIR found impacts would be significant and unavoidable.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

Under the IHO individual projects have the potential to violate air quality standards or contribute substantially to an air quality violation. 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 and individual industrial uses. 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. As noted above, the IHO in combination with the existing DBO could result in an increased number of larger projects than would otherwise occur (as developers building market rate housing and required to include affordable units may seek to make up for the loss of market rate units by building more total units consistent with the DBO). Although it is also possible that the IHO would inhibit development because of the requirements being considered too onerous, potentially leading to less development than would otherwise occur).

It is not anticipated that the IHO would result in new projects, but it could result in more incrementally larger projects which typically would not increase daily construction activity. As under the General Plan Update, construction of multiple projects simultaneously could result in total daily construction 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

would be consistent with growth assumptions for the unincorporated County of Los Angeles as analyzed in the General Plan Update EIR.

The IHO would not substantially change construction or operational air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would not increase the growth and development beyond what is anticipated from buildout of the General Plan Update. Development related to the IHO would likely be within urbanized areas and would incentivize transit and active transportation. While the IHO could incentivize more use of the DBO and therefore an increase in the number of individually incrementally larger projects, overall it is not anticipated to result in development greater than the growth assumptions in the General Plan Update which are included in the 2016 AQMP. As a result, the cumulative air quality emissions associated with the IHO were already accounted for within the General Plan Update EIR. The IHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 described above, the IHO only applies to projects of five or more units in zones that allow residential uses as the principal use. As discussed above, the IHO would not increase the growth and development beyond what is anticipated in the General Plan Update EIR nor would the ordinance change the location in which development would occur. Since the IHO is designed to increase the availability of low-income housing, the Ordinance is only applicable to residential or mixed-use projects. As a result, the Ordinance 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, as **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 IHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur

(e) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO is only applicable to residential and mixed-use projects. Therefore, the IHO 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 IHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.4 BIOLOGICAL RESOURCES

(a) Does the proposed IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would not make changes to the SEA designations or policies. The IHO would apply to areas where residential use is the primary use and most likely would occur within urban areas. Generally, these areas 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. Projects associated with the IHO which occur within SEA designated areas would be subject to all existing regulations in the SEA. Projects that make use of density bonus incentives (including IHO/DBO projects) to modify development standards are required to meet the findings for incentives or waivers from development standards as applicable. These findings stipulate that the incentive or waiver would not have a specific adverse impact upon the physical environment. Projects that do not meet these findings are subject to a discretionary review process, which require project-specific environmental analysis. **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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the proposed IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

The IHO would apply to residential projects in specified submarket areas. Many of the areas with the most sensitive natural communities such as SEAs, Hillside Management Areas (HMAs), and coastal habitat are outside of the submarket 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. While the IHO could apply in these areas, the IHO would not by itself increase the allowed density and any development would be required to be consistent with existing zoning. **Mitigation Measure BIO-1** and **BIO-3** would remain in effect to reduce potential impacts to a less than significant level.

The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the proposed IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would require new residential development within the described planning areas to set aside affordable housing units. While the IHO could increase the number of projects that are incrementally larger than they otherwise would have been (because of developers seeking to make up the loss of market rate units with additional units), the IHO 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. The unincorporated area of Los Angeles County contains areas with coastal wetlands, drainages, marshes and vernal pools. Any impact related to implementation of the IHO to these areas has already been evaluated by the General Plan Update EIR.

Impacts to federal or state protected wetlands and waters of the United States would be limited for development due to the fact that these areas have building requirements and 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 in the General Plan Update, the impacts of the ordinance would be less than what was disclosed in the General Plan Update EIR.

For waterways in the unincorporated areas that are note 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(d) Does the proposed IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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. The IHO would apply to residential projects with at least five units, and therefore in general would not affect areas that provide wildlife linkages or nursery sites. The IHO would not increase development beyond what is already anticipated under the General Plan Update. Additionally, any projects developed within a SEA would be subject to the County's 2019 SEA Ordinance, as described above. Therefore, the IHO would not

substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(e) Does the proposed IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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. However, IHO projects would still 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 IHO would not make any changes to the County Oak Tree Ordinance or OWCMP. Therefore, the IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(f) Does the proposed IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would not make any changes to the coastal land use plans and local coastal programs. The IHO applies to certain submarket areas (see **Chapter 2.0, Project Description**), which would not include areas with substantial biological resources mentioned above such as San Clemente Island Santa Catalina Island, Ballona Wetlands or the Santa Monica Mountains, While the Coastal South LA submarket would include Marina del Rey, projects in this area would not be subject to the IHO since the area is within a Specific Plan area with its own inclusionary requirements. 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.5 CULTURAL RESOURCES

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would not directly facilitate residential development but would apply to residential development of five or more units. Increasing housing overall could result in a modification or other impact to a historic building. 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 IHO 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. Further any project that includes an historical resource, as defined by PRC Section 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. Furthermore, an administrative review process is required for all for projects (including under the IHO and DBO) that request an incentive or waiver for modifications to development standards. 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 waive 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would generally be expected to apply in urban areas where sites are already developed, and impacts would not be substantial since land is already disturbed and resources already impacted. 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 section 21083.2. Health and Safety Code section 7050.5, Public Resource Code section 5097.98, and Guidelines section 15064.5(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 IHO.

The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would generally be expected to apply in urban areas where sites are already developed, and impacts would not be expected to occur. 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**. In the event that paleontological resources are encountered during the construction process, 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 Public Resources Code section 5097.5. Compliance with these guidelines would ensure no new or greater impacts would occur.

The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 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 Health and Safety Code (sections 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 IHO would be required to comply with Public Resources Code section 5097.98 as well as the Health and Safety Code (sections 7050.5, 7051, and 7054).

The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO impacts to tribal cultural resources are discussed below.

(e) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would generally be expected to apply in urban areas where sites are already developed, and impacts would not be substantial. However, projects subject to the IHO may cause impacts to unknown archaeological sites containing tribal cultural resources. **Mitigation Measure CUL-4** would continue to

apply and impacts would be reduced to a less than significant level. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would not increase development beyond what is anticipated under the General Plan Update. The siting of residential projects subject to the IHO would have to comply with the Alquist-Priolo Earthquake Fault Zoning Act. Development under the IHO would not exacerbate existing earthquake faults and associated risks conditions. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO are required to comply with CBC requirements. Each future development would be preceded by a detailed, site-specific geotechnical investigation. Development under the IHO would not exacerbate existing ground shaking. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO will need to comply with CBC regulations. Development under the IHO would not exacerbate existing liquefaction potential. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO would not exacerbate existing landslide conditions; existing CBC requirements to investigate and address soil conditions would ensure that projects do not exacerbate risk. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

Residential projects subject to the IHO 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 IHO projects would also have to comply with NPDES requirements as appropriate. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO 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 Update goals and policies, would ensure that no new or greater impacts would occur. Development under the IHO would not exacerbate existing soil conditions. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO 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 IHO will still be required to comply with regulations applicable to OWTS. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.7 GREENHOUSE GAS EMISSIONS

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑

Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO 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.

The IHO supports the CCAP in promoting housing that will be energy efficient, given that housing would need to comply 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, and housing that promotes alternative modes of transportation. Further, when combined with density bonus, the IHO could result in affordable housing in urbanized areas near transit and services, which is where density bonus is most likely to be implemented.

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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would result in more affordable housing in the County by requiring affordable housing set asides. The IHO will 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 IHO is consistent with the CCAP in promoting housing near transit through the implementation of density bonus. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.8 HAZARDS AND HAZARDOUS MATERIALS

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would result in additional affordable housing in the unincorporated County. Construction of new housing could require the demolition of existing buildings which 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, projects subject to the IHO are residential projects that do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the IHO would not involve the substantial transport, use, and disposal of hazardous materials. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR indicates that numerous sites within the County are listed on hazardous materials databases complied pursuant to Government Code section 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.

The IHO would increase affordable housing in unincorporated Los Angeles County by requiring set asides in projects of five units or more. Some projects subject to the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

Projects subjects to the IHO may 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 IHO by itself would not increase the number of units that are allowed to be built since it only required a set aside of affordable units. As such, the IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑

Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 and therefore it is unlikely that a project would be approved that blocks access to the public right of way. The IHO would not increase population or the number of total housing units (although as discussed above, combined with the DBO it could lead to a greater number of individually larger projects than would otherwise have occurred). Projects subject to the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(e) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

The IHO could result in an increased number of larger projects making use of the DBO. However, Los Angeles County's Very High Fire Hazard Severity Zones are mostly zoned to support low density single-family, open space and agricultural development. A density bonus is unlikely to be utilized for single-family development because of the amount of land that would be required. The IHO which works in tandem with density bonus provisions is likely to result in affordable housing, which tends to serve transit-dependent populations and is built in urban areas that are accessible to services and municipal water systems. These attributes are not typical of fire hazard areas. Any projects subject to the IHO constructed in these areas as a result of this ordinance would be regulated by existing Health & Safety Code, Building Code and Fire Code requirements. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

Projects subject to the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO requires the set aside of affordable housing, it is not expected to result in new development that would otherwise not occur. Therefore, it is unlikely there would be any increase in impervious surface as a result of the IHO. Further, any increase in imperious surface as a result of the IHO in combination with density bonus would be within the increases analyzed in the General Plan Update EIR. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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, projects subject to the IHO are required to mimic predevelopment hydrology, evapotranspiration, and rainfall harvest as required by the MS4 permit. As a result, the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

Project subject to the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(e) Does the IHO Require Subsequent or Supplemental CEQA Documentation with respect to alter the following:

(e) 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?

(f) 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(f) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 projects subject to the IHO may result in development of project 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(g) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO as it has a Specific Plan with an affordable housing requirement. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.10 LAND USE AND PLANNING

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO applies to residential and mixed-use projects and, as a result, would not incentivize the construction of transportation or other types of projects that have the ability to physically divide an area. Projects subject to the IHO would necessarily be 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

Development in accordance with the IHO would occur primarily in residential areas and urbanized areas close to transit. The IHO would be consistent with local land use plans, goals, and policies calling for more affordable housing, transit serving development, mixed-use development served by high-quality transit. The IHO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by expanding the supply of affordable housing. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 projects subject to the IHO developed in areas covered by conservation plans would be required to comply with provisions of those plans. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.11 MINERAL RESOURCES

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would not substantially reduce the regional availability of oil and natural gas. While projects subject to the IHO could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the IHO are currently in use as mineral extraction. The IHO would not

substantially change impacts as compared to those identified for the General Plan Update; no new greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO is not likely to affect mineral resource zones or otherwise result in the loss of locally important mineral resources. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.12 NOISE AND VIBRATION

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

The IHO would result in projects that would 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 IHO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. Projects subject to the IHO would be residential and mixed-use developments which do not generate significant amounts of noise compared to other types of uses. Traffic associated with development under the IHO would be within the assumptions made and analyzed in the General Plan Update EIR. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO is not anticipated to result in significant generation of, groundborne vibration or groundborne noise levels in excess of County standards. Project subject to the IHO are residential or mixed-use projects. The IHO would not include the development of industrial land uses typical of excessive groundborne vibration or groundborne noise levels. However, construction of projects subject of the IHO may 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

Projects developed under the IHO would generate traffic that could 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

The IHO would not increase the number of projects but could increase the size of more projects than would otherwise occur possibly resulting in longer duration of 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 IHO does not provide incentives for industrial 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(e) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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).

The IHO 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 IHO 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 IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would require affordable housing set asides in applicable zones and submarket areas. If a project subject to the IHO elects to apply the DBO provisions, then additional residential units may be constructed. However, it is not anticipated to result in a substantial increase in population, and the effects of the IHO on its own would be minimal and well within the assumptions of the General Plan Update. The IHO itself would not increase housing development but would require income-restricted units be provided within a development project. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO is unlikely to result in the displacement of substantial numbers of existing housing units, either market rate or affordable. The purpose of the IHO is to increase affordable housing supply in the unincorporated areas of Los Angeles County. For example, the IHO would work with the Affordable Housing Preservation Ordinance to help ensure there is no net loss of affordable housing. In the event that a project subject to the IHO also requests a density bonus or other incentives or concessions under the DBO, the project is also required to replace existing residential units occupied by very low or lower income households. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.14 PUBLIC SERVICES

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 Los Angeles County Fire Department 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 Los Angeles County Fire Department. **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.

Projects that are subject to the IHO will likely be outside of areas with the highest fires risk in Los Angeles County, such as those in the Very High Fire Hazard Severity Zones. These areas are often also within an HMA and/or SEA, where there are also development standards and permitting requirements that are intended to protect people, property, and resources such as hillsides and habitat through the HMA and SEA Ordinances. These areas are generally zoned for open space and low-density single-family residential

uses, where the applicability of IHO with or without the use of the DBO is less likely compared to urbanized, infill areas where the fire risk is lower. The IHO does not increase development capacity 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 IHO. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 Los Angeles County Sheriff's Department 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.

The IHO would require set aside of affordable housing units. Similar to fire services, the projects subject to the IHO are not expected to increase population, but rather to assist increase the stock of affordable housing in the County. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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 IHO would increase the affordable units in the County; it would not be expected to increase population substantially. Therefore, it is unlikely that additional schools would need to be constructed as a result of

the IHO. Projects subject to the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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.

The IHO would require the set aside of affordable units and would not result in new projects, although as discussed above it could lead to some individual projects having more units but would not increase total forecast population as it would accommodate existing need for affordable housing. Therefore, it is unlikely that additional libraries would need to be constructed as a result of the IHO. Regardless, consistent with the General Plan Update, projects subject to the IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.15 RECREATION

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 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.

The IHO would not induce population growth within the County; rather it would serve the forecast population by increasing the number of units in the housing stock that are affordable, although, as mentioned previously, projects subject to the IHO may choose to use the DBO to increase the total number of units in a development. New development would be subject to the Quimby Act and local policies and guidelines regarding the provision of parks and recreation facilities. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would not induce population growth and would add to the affordable housing stock for the County. Projects subject to the IHO would comply with existing federal, state, and local regulations regarding parks and recreational facilities. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.16 TRANSPORTATION AND TRAFFIC

(a) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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.

The IHO would require the set aside of affordable housing for projects of five or more units. Similar to the General Plan Update, it is not possible to determine exactly where inclusionary housing development would occur. When combined with the DBO, projects subject to the IHO could increase in number of units compared to what is allowed under the zoning. In general, projects that make use of the DBO are located in urbanized areas often in close proximity to transit and walkable areas. The IHO would not substantially change traffic impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO would allow projects in the vicinity of an airport, these projects would be limited in number and therefore unlikely to significantly affect flight paths or air travel. And although the IHO could increase the amount of housing that would be eligible for incentives such as height increases, it is unlikely that projects would exceed 200 feet in height (a threshold for consultation with the Federal Aviation Administration).

Existing FAA regulations and the ALUCPs and are intended to identify and properly address potential airport hazards prior to implementation of specific projects. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(c) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 in accordance with the IHO is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The IHO 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 IHO would have no impact related to design feature hazards. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impact would occur.

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(e) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 in accordance with the IHO would be consistent with the underlying zoning for the site. In combination with the DBO, projects subject to the IHO could increase the unit count of individual projects. Projects would continue to be consistent with General Plan Update policies. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.17 UTILITIES AND SERVICE SYSTEMS

Wastewater Treatment and Collection

(a) Does the IHO Require Subsequent or Supplemental CEQA Documentation with respect to exceed 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

(b) Does the IHO 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 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 in accordance with the IHO would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing sewer lines. The size of individual projects is anticipated to be relatively small (although incrementally bigger than they would otherwise have been as a result of the potential for increased use of the existing DBO), resulting in minor impacts to the sewer system in the vicinity of each site. Development in accordance with the IHO would be required to comply with all applicable County regulations. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Water. Water would be conveyed to projects along existing circulating water mains of varying sizes. Projects are anticipated to be generally located in infill areas on land previously 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 IHO would be required to comply with water conservation requirements and ensure that adequate infrastructure exists. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Water Supply and Distribution System

(c) Does the IHO Require Subsequent or Supplemental CEQA Documentation with respect to the following:

(d) 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?

(e) Would not 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO does 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 in infill areas 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Solid Waste

(d) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 IHO does 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. Inclusionary housing developments are likely to be located in areas with existing residential uses that are already served by existing landfills. Projects that obtain planning and building approvals would be

consistent with solid waste regulations. The IHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Other Utilities

(e) Does the IHO 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?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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 SCE's demand forecast for its service area. Therefore, the General Plan Update EIR finds impacts to be less than significant.

The IHO does 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 IHO 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 IHO does 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 IHO would not substantially change impacts as compared to those identified for the General Plan Update; 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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