

EXHIBIT C.1:
Addendum to the Final Environmental Impact Report for the
Citywide 2021-2029 Housing Element Update and Safety
Element Update

CPC-2023-7068-CA, CPC-2024-387-CA, CPC-2024-388-CA

Recommended by the City Planning Commission on September 26, 2024

October 3, 2024



ADDENDUM

HOUSING ELEMENT REZONING PROGRAM: CITYWIDE HOUSING INCENTIVE PROGRAM ORDINANCE, HOUSING ELEMENT SITES AND MINIMUM DENSITY ORDINANCE, RESIDENT PROTECTIONS ORDINANCE, AND ADAPTIVE REUSE ORDINANCE

ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE CITYWIDE 2021-2029 HOUSING ELEMENT UPDATE AND SAFETY ELEMENT UPDATE

Case Number: ENV-2020-6762-EIR-ADD2

State Clearinghouse Number: 2021010130

Project Location: The Los Angeles Housing Element Rezoning Program would apply to the entire geographic area located within the boundaries of the City of Los Angeles (City), which encompasses 467 square miles. Los Angeles is a coastal city, generally surrounded by the San Gabriel Mountains to the north, urban development and the Verdugo Mountains, San Rafael Hills and San Gabriel Valley to the east, and urban development and the Santa Susana Mountains, Santa Monica Mountains, and Pacific Ocean to the west and south. The City is highly urbanized and contains a variety of residential, civic, institutional, commercial, industrial, and recreational/open space uses within the communities that comprise the City.

Community Plan Area: All

Council District: 1 - Eunisses Hernandez, 2 - Paul Krekorian, 3 - Bob Blumenfield, 4 - Nithya Raman, 5 - Katy Yaroslavsky, 6 - Imelda Padilla, 7 - Monica Rodriguez, 8 - Marqueece Harris-Dawson, 9 - Curren D. Price Jr., 10 - Heather Hutt, 11 - Traci Park, 12 - John Lee, 13 - Hugo Soto-Martinez, 14 - Kevin de León, 15 - Tim McOsker

Project Description: The City's 2021-2029 Housing Element evaluated sites with the potential to be developed with housing during the applicable planning period to meet the City's Regional Housing Needs Assessment allocation and, as a result, identified a need for a Housing Element Rezoning Program to accommodate capacity for at least 255,432 new units of housing. The Housing Element Rezoning Program consists of several key work efforts, including ongoing and parallel initiatives to update the City's Community Plans, Transit Neighborhood Plans, and Specific Plans. The Housing Element Rezoning Program also encompasses targeted citywide code amendments including those that comprise the Proposed Project. Specifically, the Proposed Project includes four ordinances, which entail amendments to both Chapter 1 and Chapter 1A of the Los Angeles Municipal Code: the Citywide Housing Incentive Program Ordinance, an expansion to the City's existing Adaptive Reuse Ordinance, a Housing Element Sites and Minimum Density Ordinance, and a Resident Protections Ordinance.

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DRAFT

1 INTRODUCTION

1.1 PURPOSE OF THIS ADDENDUM

The purpose of this Addendum to the Environmental Impact Report (EIR) prepared for the 2021-2029 Housing Element Update and Safety Element Update (“Housing Element EIR”) is to evaluate the environmental effects of targeted code amendments (the Citywide Housing Incentive Program [CHIP] Ordinance, the Citywide Adaptive Reuse Ordinance, the Housing Element Sites and Minimum Density Ordinance, and the Resident Protections Ordinance) associated with the Housing Element Rezoning Program (“Proposed Project”).

On November 24, 2021, the Los Angeles City Council certified the Housing Element EIR and adopted the updates to the Housing Element, Safety Element, and Health Element. Subsequently on June 14, 2022, the Los Angeles City Council adopted additional targeted amendments to the Housing Element that were identified as needed for compliance with State housing element law. The Housing Element EIR was prepared to examine the potential environmental effects of the 2021-2029 Housing Element Update and Safety Element Update, including build out of the Regional Housing Needs Assessment (RHNA), as well as the programs and policies that have the potential to result in physical environmental effects. Furthermore, it provides analysis associated with the Inventory of Housing Element Inventory of Sites (currently Appendix 4.1, 4.2, and 4.3 of the 2021-2029 Housing Element) and Housing Element Rezoning Program required to demonstrate zoned capacity needed to accommodate the City’s RHNA allocation.

As indicated in *Section 2, Project Description*, the Proposed Project involves targeted code amendments as part of the Housing Element Rezoning Program, required by the 2021-2029 Housing Element. In particular, the Proposed Project encompasses new land use incentives for affordable housing as well as updates to the City’s existing incentive-based housing development programs. Furthermore, the Proposed Project includes targeted code amendments to expand tenant protections as well as align with State law streamlining and lower income site requirements [California Government Code Section 65583.2(h) and (i)]. The purpose of this Addendum is therefore to evaluate the Proposed Project consistent with *CEQA Guidelines* Section 15164. Based on the analysis found herein, this Addendum affirms the Proposed Project does not result in a change to the project or new circumstances (created as a result of changes to State legislation) that would require a major revision to the Housing Element EIR due to new significant impacts or a substantial increase in the severity of a previously identified significant effect.

1.2 HOUSING ELEMENT UPDATE AND THE HOUSING ELEMENT EIR

The Housing Element is one of the eight State-mandated elements of the General Plan. It identifies the City’s housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City’s housing strategy, and provides an array of programs to create sustainable, mixed-income neighborhoods across the City. The Housing Element Law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community through the preparation of a housing element. The law requires local governments to adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. Furthermore, the law mandates the update of a local jurisdiction’s housing element every eight years to accommodate the jurisdiction’s RHNA.

The RHNA is mandated by State law as part of the periodic process of updating local housing elements of a jurisdiction’s general plan. The RHNA allocation process begins with a regional determination figure (the total number of housing units needed to meet housing needs of

California's regional bodies known as Councils of Governments [COG]) issued by the California Department of Housing and Community Development (HCD), followed by an allocation to each jurisdiction within the region (specific number of units allocated to each jurisdiction within a COG). For the City of Los Angeles, the current RHNA projection period covers an eight-year period from October 2021 to October 2029 and the RHNA allocation is assigned by the Southern California Association of Governments (SCAG).

Under the RHNA allocation, the City is required to provide the zoned capacity to accommodate the development of at least 456,643 residential units using various land use planning strategies. The City provides capacity for housing through local zoning regulations. The City, however, is not required to physically construct 456,643 units as a result of the RHNA allocation.¹

The City's 2021-2029 Housing Element evaluated sites with the potential to be developed with housing during the planning period, and as a result identified a need for a Housing Element Rezoning Program to accommodate 255,432 units of housing capacity, as required to meet the RHNA allocation. The 2021-2029 Housing Element includes a detailed description of the anticipated Housing Element Rezoning Program, including an identified implementation program (see Program 121) and an Inventory of Candidate Sites for Rezoning (Appendix 4.7). For more information on the other 2021-2029 Housing Element Programs that will be implemented through the Proposed Project, please refer to *Section 2, Project Description*. Appendix 4.7 represents a list of potential sites that will be considered through the Housing Element Rezoning Program; however, not all sites that will be rezoned are necessarily included on this list, and not all sites on the list will necessarily be rezoned as part of the Housing Element Rezoning Program. See *Section 2.3, Description of the Housing Element Rezoning Program Targeted Code Amendments (Proposed Project)*, for additional information.

Following the adoption of the housing element, jurisdictions have three years to adopt the rezoning of sites, with some ability for extensions based on specific criteria. For the City of Los Angeles, the rezonings must be adopted and effective by February 2025.

As stated, on November 24, 2021, the Los Angeles City Council certified the Citywide 2021-2029 Housing Element Update and Safety Element Update EIR, SCH No. 2021010130 and adopted the updates to the Housing Element and Safety Element. The Housing Element EIR analyzed the environmental effects of the Citywide Housing Element 2019-2029 Update and Safety Element Update, and the associated Housing Element Rezoning Program for the creation of additional housing.

On June 14, 2022, the Los Angeles City Council adopted additional targeted amendments to the 2021-2029 Housing Element that were identified as needed to achieve substantial compliance with State housing element law and adopted an Addendum to the Housing Element EIR (ENV-2020-6762-EIR-ADD1). For the purposes of this document, the November 24, 2021, EIR and June 14, 2022, Addendum will be collectively referred to as the Housing Element EIR.

The adopted 2021-2029 Housing Element may be accessed online at: <https://planning.lacity.org/plans-policies/housing-element-update#adopted-plan>.

The Housing Element EIR is available for review at the City of Los Angeles, Department of City Planning Records Management, 221 North Figueroa Street, Room 1450 Los Angeles, and online at the following weblinks:

¹ As discussed in the Housing Element EIR, to ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that jurisdictions identify a buffer over the required allocation, particularly for the lower-income allocation, for the purposes of creating the inventory of sites. The City has set a target capacity that is 10 percent higher than the RHNA for lower income units, and 15 percent higher than the RHNA for moderate income units. As such, the City's Housing Element Inventory of Sites targets identifying a capacity of 486,379 units.

- Draft EIR: https://planning.lacity.org/development-services/eir/Housing-Element_2021-2029_Update_Safety-Element_Update_deir
- Final EIR: <https://planning.lacity.org/development-services/eir/housing-element-2021-2029-update-safety-element-update-0>
- EIR Administrative Record: Los Angeles City Council File 21-1230: <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-1230>
- Addendum to the EIR: https://clkrep.lacity.org/online/docs/2021/21-1230-S1_misc_7_5-24-22.pdf
- Addendum Administrative Record: Los Angeles City Council File 21-1230-S1: <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=21-1230-S1>

1.3 CEQA REQUIREMENTS

According to Section 15164(a) of the *CEQA Guidelines*, "the lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Section 15164(c) states that an addendum does not need to be circulated for public review. Section 15164(d) provides that the decision-making body shall consider the addendum in conjunction with the certified EIR prior to making a decision on the project. Section 15164(e) requires documentation of the decision not to prepare a subsequent or supplemental EIR pursuant to Section 15162.

Section 15162 of the *CEQA Guidelines* lists the conditions that would require the preparation of a subsequent EIR or negative declaration rather than an addendum. These include the following:

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:
 - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - 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; or
 - 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.

The Proposed Project has been reviewed by the City of Los Angeles in light of Sections 15162 and 15164 of the *CEQA Guidelines*. As the CEQA Lead Agency, the City of Los Angeles has determined, based on the analysis presented herein, that none of the conditions apply which would require preparation of a subsequent or supplemental EIR and that an Addendum to the certified Housing Element EIR is the appropriate environmental documentation under CEQA for the Proposed Project.

1.4 CHANGES TO THE HOUSING ELEMENT EIR TO BE ANALYZED BY ADDENDUM

Per Section 15162 of the *CEQA Guidelines*, changes to the proposed project may necessitate a subsequent EIR or negative declaration if the changes contribute to a new or intensified significant environmental impact not contemplated in the previously certified EIR. The Proposed Project would apply citywide and its location and geographic distribution is consistent with the project analyzed as part of the Housing Element EIR except under a limited circumstance. In particular, the strategies proposed as part of the Mixed Income Incentive Program (described in further detail in *Section 2, Project Description*) would not be applicable in Very High Fire Hazard Severity Zones (VHFHSZs), Coastal Zone, or areas vulnerable to sea level rise. Notwithstanding this eligibility requirement, project sites that are on Ventura Boulevard in VHFHSZs; or abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ may be eligible for the incentives proposed as part of the Mixed Income Incentive Program only.

The Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program that would enable this construction in these very targeted areas. For this reason, this policy direction currently incorporated into the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood (see VHFHSZ maps provided in *Section 2.1, Project Location* for additional information). The Proposed Project will also propose an amendment to the Zoning Code in Chapter 1 of the Los Angeles Municipal Code (LAMC) to authorize the Director to adopt environmental protection measures to allow the adoption of an environmental standard for housing development in the vicinity of an active oil well and to modify the mitigation measures to provide an improved administrative and enforcement scheme to implement mitigation measures for the 2021-2029 Housing Element.

1.5 CHANGES TO CIRCUMSTANCES

Per Section 15162 of the *CEQA Guidelines* a change in circumstances would necessitate the preparation of a subsequent EIR or negative declaration should the change in circumstances contribute to a new significant environmental impact or an increase in the severity of a previously identified significant impact. This section provides additional information on State legislation adopted after the certification of the 2021-2029 Housing Element that could influence housing production in Los Angeles.

In 2022 and 2023, the California State Legislature adopted numerous housing production focused bills that have and will continue to impact housing development in Los Angeles. Based on a thorough review of new State legislation (described in further detail as follows), this Addendum has determined that the new State laws will not result in a change in circumstance that necessitates a major revision to the Housing Element EIR pursuant to Public Resources Code (PRC) Section 21166 and *CEQA Guidelines* Section 15162.

2022 – Assembly Bills 682, 1551, 2011, 2097, and 2334*Assembly Bill 682*

Assembly Bill (AB) 682 establishes “shared housing” as a new eligible category in State Density Bonus Law (California Government Code Sections 65915-65918) for projects providing the designated set aside of affordable units. A “shared housing unit” means one or more habitable rooms not contained within another dwelling unit, which includes a bathroom, sink, refrigerator, and microwave within the unit, and complies with the definition of “guestroom” per the California Building Code. The law allows shared housing buildings, with five or more shared housing units, to be built in areas where density bonus projects are permitted and to receive incentives and density bonuses under the State Density Bonus Law.

Implementation of AB 682 is not expected to result in substantial new environmental impacts beyond those analyzed in the Housing Element EIR by expanding the types of housing projects deemed eligible under State Density Bonus Law to include “shared housing buildings.” The 2021-2029 Housing Element contemplated providing affordable housing incentives to alternative building typologies, including shared housing (see Program 62), and the introduction of a new eligible housing category will facilitate the build out of the City’s RHNA allocation in areas that already permit residential uses.

Assembly Bill 1551

AB 1551 refreshes a 2016 law (AB 1943) to extend State Density Bonus Law benefits to commercial projects that provide affordable housing, either onsite or within a local jurisdiction on a site that is located within a half mile of a major transit stop and in close proximity to public amenities. A commercial developer may receive a development bonus that could include but is not limited to up to a 20 percent increase in maximum allowable intensity in the General Plan, up to a 20 percent increase in maximum allowable floor area ratio (FAR), or up to a 20 percent increase in maximum height requirements, in exchange for setting aside at least 30 percent of units for Low Income households or 15 percent of units for Very Low Income households.

The provisions of AB 1551 are aligned with the goals, policies, and objectives of the 2021-2029 Housing Element that called for the expansion of the types of projects that are eligible for affordable housing incentives. Commercial projects providing affordable housing units either onsite or locally offsite would support the City’s build out of its RHNA allocation. The bill does not permit housing in areas of the City not already considered and analyzed by the Housing Element EIR, and therefore it is not anticipated that AB 1551 will have new environmental impacts.

Assembly Bill 2011

AB 2011 creates a streamlined approval process for mixed income and 100 percent affordable housing projects that are in eligible areas zoned for retail, office, and parking uses. Sites that are located on or adjacent to an industrial use or land use designation, or on an environmentally sensitive site, in a mobile home park, within a Specific Plan that prohibits housing, within 500 feet of a freeway, or within 3,200 feet of an oil refinery are not eligible. Vacant sites that contain tribal cultural resources or are in a VHFHSZ are also not eligible. Projects with less than 50 units must follow the prevailing wage requirements of California Government Code Section 65912.130, and projects with 50 units or more must also follow the apprenticeship and healthcare provisions of California Government Code Section 65912.131.

The streamlining provisions for mixed income and 100 percent affordable housing projects enabled by AB 2011 are not expected to result in substantial new environmental impacts that exceed what was analyzed in the Housing Element EIR. The types of sites eligible for streamlining

are mostly within areas of the City that already allow residential uses (commercial zones), avoid environmentally sensitive areas, and would not result in unanticipated growth or a change in development patterns. Based on previous utilization of local programs, the labor requirements are anticipated to limit use of the bill largely to 100 percent affordable housing projects which already are subject to labor requirements. The streamlined approval process for eligible projects will further facilitate housing development that helps the City meet its RHNA allocation.

Assembly Bill 2097

AB 2097 prohibits cities from imposing minimum vehicle parking requirements for residential, commercial, or other development projects located within a half mile of a major transit stop. To deny parking reductions, findings with a preponderance of evidence in the record must be made to demonstrate a substantially negative impact to meet the RHNA needs for Low or Very Low Income households, meet special needs housing, or existing residential or commercial parking facilities located within a half mile of the project.

By reducing the amount of parking required for projects in close proximity to transit, AB 2097 potentially supports the production of affordable housing at a lower cost. The provisions of AB 2097 serve as a housing production mechanism that will aid the City in meeting its RHNA allocation. Furthermore, the provisions of the bill are consistent with the policies of the 2021-2029 Housing Element which call for transit-oriented incentives along transit-served corridors, reduced parking requirements, and innovative parking strategies (see Program 21). Since AB 2097 became effective, it has been observed that housing developers tend to utilize the bill to “right-size” their parking, not eliminate it, as parking remains an amenity for prospective residents in new construction. Thus, the implementation of reduced parking near transit does not constitute a change in circumstance and is not anticipated to have substantial new environmental impacts.

Assembly Bill 2334

AB 2334 expands the definition of “maximum allowable residential density” to identify a project’s base density as the greatest number of units found in a project site’s applicable zoning ordinance, specific plan, or general plan, if a range is permitted or if inconsistent. The bill also broadened locations of where significant concessions are provided for 100 percent affordable housing developments to include very low vehicle travel areas.

Implementation of the revised “maximum allowable residential density” definition and the expansion of geographic eligibility 100 percent affordable housing projects per AB 2334 will increase development capacity in areas of the City that already allow or are planned for multi-family residential uses in the General Plan. The analysis associated with the 2021-2029 Housing Element identified the need to increase the City’s zoning capacity to meet RHNA allocation requirements. By enabling additional capacity and expanding areas where affordable housing incentives apply, AB 2334 contributes to the overall production of affordable housing needed to meet the City’s RHNA allocation and is in alignment with many of the central priorities and strategies contemplated in the Housing Element. As such, AB 2334 is not anticipated to have significant impacts beyond those identified in the Housing Element EIR.

2023 – Senate Bills 4, 423 and SB 684, and Assembly Bills 1218, 1287, 1449, and 1490

Senate Bill 4

Senate Bill (SB) 4 enables a streamlined approval process for eligible housing developments proposed by faith-based organizations or nonprofit colleges. Under SB 4 housing developments

proposed by faith-based organizations or nonprofit colleges may receive additional density or height allowances so long as projects are 100 percent affordable. For the purposes of SB 4, 100 percent affordable means all units should be affordable to Low Income households except that 20 percent may be affordable to Moderate Income households. Additionally, five percent of units may be reserved for staff. Elements of SB 4 will be embedded into the LAMC through the CHIP Ordinance, discussed in more detail in *Section 2.3, Description of the Housing Element Rezoning Program Targeted Code Amendments (Proposed Project)*.

The Housing Element EIR analyzed the potential environmental impacts that could result from the build-out of the City's RHNA on lots zoned single-family and multi-family. Furthermore, the provisions of SB 4 are consistent with the policy objectives and programs included in the certified 2021-2029 Housing Element which called for expanded incentives for sites owned by religious organizations as part of the RHNA Re-zoning Program (see Program 121). For this reason, implementation of SB 4 is not anticipated to result in any substantial new environmental impacts beyond those analyzed and discussed in the Housing Element EIR.

Senate Bill 423

SB 423 makes the streamlining provisions of SB 35 (2017) permanent by removing the previously codified sunset date. Furthermore, SB 423 removes the prohibition on the usage of SB 35 streamlining in the Coastal Zone starting in 2025 but adds certain limitations on sensitive coastal sites. Additionally, the bill amends SB 35's labor provisions by requiring prevailing wages for projects greater than 10 units and mandating paid healthcare and apprenticeship opportunities on projects greater than 50 units.

The passage and implementation of SB 423 is not expected to result in any substantial new environmental impacts beyond those analyzed in the Housing Element EIR. This is because the provisions contained in SB 423 serve more as a procedural tool to facilitate the build out of the RHNA in areas of Los Angeles where multi-family residential uses are already allowed. Changes brought forth by SB 423 do expand streamlining to the Coastal Zone, but the Coastal Zone was taken into consideration by the Housing Element EIR as an area where the development of units that count toward the City's RHNA target could reasonably occur. Only areas that already permit multi-family use in the Coastal Zone are permitted to use the new allowance. Therefore, implementation of SB 423 does not constitute a change in circumstance that would result in new environmental impacts.

Senate Bill 684

SB 684 streamlines the review of subdivisions by requiring a ministerial approval process for a parcel map or a tentative and final map for a subdivision of 10 or fewer parcels and its corresponding housing development project, excluding Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs). The bill allows eligible projects meeting specified requirements to not be subject to discretionary review or a public hearing and must be approved or denied within 60 days from the date an application is deemed complete.

The implementation of SB 684 is not expected to result in new environmental impacts not already contemplated by the Housing Element EIR. The procedural, streamlining provisions of this bill will facilitate the build out of the RHNA in areas of the city that already permit residential uses. Additionally, SB 684 is consistent with the programs and policies analyzed in the 2021-2029 Housing Element calling for new, innovative procedures for subdivisions (see Program 3). As such, SB 684 is not anticipated to have substantial impacts beyond those analyzed in the Housing Element EIR.

Assembly Bill 1218

AB 1218 expands requirements for replacement units and other tenant protections to nonresidential projects thereby mandating that nonresidential developments replace any protected units demolished in the last five years from the date a project is proposed. In essence, AB 1218 makes replacement requirements applicable to proposed nonresidential developments that were previously only applicable to housing developments under the Housing Crisis Act of 2019. Industrial projects in zones that prohibit residential uses are exempt from this expanded replacement unit requirement.

The provisions of AB 1218 are not expected to result in new environmental impacts and the expanded replacement requirements align with what was contemplated in the Housing Element EIR. In particular, the 2021-2029 Housing Element goals, policies, and objectives placed a strong emphasis on replacement requirements as a key tool for displacement prevention and preservation of affordable housing. The most likely impact of the new requirements on the physical environment may be to slow or prevent some types of nonresidential development. Though the scope of AB 1218 goes beyond what was contemplated in the 2021-2029 Housing Element since it applies replacement requirements to nonresidential projects, it still is consistent with the priorities disclosed in the 2021-2029 Housing Element and analysis conducted as part of the Housing Element EIR.

Assembly Bill 1287

AB 1287 amends State Density Bonus Law to require a city or county to grant a housing development an additional density bonus when a proposed project provides additional affordable units (for-lease or for-sale) restricted to households with Very Low or Moderate incomes on top of the commensurate number of restricted affordable units required to utilize a 50 percent density bonus. Additionally, AB 1287 allows housing development projects to access a fourth incentive or concession if a project restricts at least 16 percent of units to Very Low Income households (for-lease) or 45 percent to Moderate Income households (for-sale). One hundred percent affordable housing developments may also take advantage of a fifth incentive under AB 1287. The City will facilitate the implementation of AB 1287 through administrative memorandums as well as memorializing its provisions in the LAMC as part of the CHIP Ordinance as discussed in *Section 2.3, Description of the Housing Element Rezoning Program Targeted Code Amendments (Proposed Project)*.

As AB 1287 expands incentives for mixed income and 100 percent affordable housing development under State Density Bonus Law, it will facilitate the build out of the RHNA in areas of the City that allow multi-family residential uses as contemplated by the Housing Element EIR. For this reason, it is not anticipated that its implementation would result in any new environmental impacts beyond what has already been analyzed.

Assembly Bill 1449

AB 1449 broadens exemptions under CEQA for projects that meet the definition of a 100 percent affordable housing development. Projects are also only eligible for these expanded exemptions if labor standards contained in California Government Code Sections 65912.130 and 65912.131 are met and projects are located in Low Vehicle Miles Traveled (VMT) Areas or within a half mile of a Major Transit Stop or High Quality Transit Corridor.

Implementation of AB 1449 is not expected to result in substantial new environmental impacts since its provisions enable new CEQA streamlining tools that will help facilitate housing units that could already be constructed in areas that allow residential uses and CEQA streamlining was envisioned as a strategy in the Housing Element. AB 1449 will support the build out of the City's

RHNA in areas where development is anticipated as discussed and analyzed in the Housing Element EIR and will not generate development not already contemplated in the Housing Element EIR.

Assembly Bill 1490

AB 1490 requires local jurisdictions to classify 100 percent affordable housing developments (including at least 50 percent for Very Low Income households) adaptively reusing an existing building to be considered a by-right use regardless of underlying zoning so long as specific conditions are met. To qualify for the provisions of this bill, a proposed housing development must be located within the envelope of an existing residential or commercial building. Furthermore, it must be located on an infill parcel as defined in California Government Code Section 65913.12 (a)(6) and may not be located on or adjoining a site where more than one-third of site's square footage is dedicated to industrial use. The provisions of AB 1490 are to be embedded in the LAMC through the Citywide Adaptive Reuse Ordinance as discussed in *Section 2.3, Description of the Housing Element Rezoning Program Targeted Code Amendments (Proposed Project)*.

Implementation of the provisions of AB 1490 would not result in substantial new environmental impacts not already contemplated by the Housing Element EIR. In particular, the Housing Element EIR took into consideration a variety of rezoning strategies as part of the City's Housing Element Rezoning Program including amendments to the City's Zoning Code needed to better support the adaptive reuse of existing structures (see Program 13).

2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The “Proposed Project”, which includes code amendments (the CHIP Ordinance, the Citywide Adaptive Reuse Ordinance, the Housing Element Sites and Minimum Density Ordinance, and the Resident Protections Ordinance) proposed as part of the Los Angeles Housing Element Rezoning Program, would apply to the entire geographic area located within the boundaries of the City of Los Angeles, which encompasses 467 square miles. Los Angeles is a coastal city, generally surrounded by the San Gabriel Mountains to the north, urban development and the Verdugo Mountains, San Rafael Hills and San Gabriel Valley to the east, and urban development and the Santa Susana Mountains, Santa Monica Mountains, and Pacific Ocean to the west and south. The City is highly urbanized and contains a variety of residential, civic, institutional, commercial, industrial, and recreational/open space uses within the communities that comprise the City. Figure 1 on the following page shows the general boundaries of the City limits in the context of the greater County of Los Angeles area.

A grid system of east-west and north-south roadways, including arterials, collectors, and local streets, provides vehicular access throughout the City. The major freeways and highways providing regional access through the City are Interstate 5 (I-5), Interstate 405 (I-405), Interstate 10 (I-10), Interstate 110 (I-110), Interstate and State Route 210 and 710, and U.S. Highway 101 (U.S. 101). The Port of Los Angeles, located at the southern end of the City, is a seaport managed by the Los Angeles Harbor Department that occupies 7,500 acres of land and water along 43 miles of waterfront and adjoins the separate Port of Long Beach.

Geographic Distribution of Project

The 2021-2029 Housing Element analyzed in the Housing Element EIR is the build out of the RHNA over the planning period through 2029, which may occur anywhere in the City on sites currently zoned for housing or sites not currently zoned for housing (e.g., industrial sites), but which are rezoned on a project by project basis or rezoned as part of the Housing Element Rezoning Program (the current Proposed Project). The Rezoning Program included in the Housing Element, would occur in geographic areas that are similar to those identified in the Housing Element Inventory of Sites (i.e., areas near public transit, jobs, in existing growth areas identified in the Framework Element), and in Higher Opportunity Areas. Higher Opportunity Areas are defined as High and Highest Resource Areas as identified in the California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Maps, which are shown in Figure 2 following Figure 1 and can be accessed at <https://www.treasurer.ca.gov/ctcac/opportunity.asp>.

While it is foreseeable that rezoning may occur anywhere on a project-by-project basis anywhere in the City, rezoning under the Housing Element Rezoning Program will foreseeably occur in areas identified in the General Plan including near transit corridors and stations, job centers, neighborhood services and amenities, and particularly in Higher Opportunity Areas to provide a more equitable distribution of housing opportunities. The concentration of build out of the RHNA in these areas is be consistent with the development patterns studied in the Housing Element EIR.

The Proposed Project would apply citywide unless otherwise specified in this Project Description. In particular, the strategies proposed as part of the Mixed Income Incentive Program (described in further detail in *Section 2.3, Description of the Housing Element Rezoning Program Targeted Code Amendments [Proposed Project]*) would not be applicable in VHFHSZs, areas vulnerable to sea level rise, or the Coastal Zone. Notwithstanding this eligibility criteria, project sites that are

on Ventura Boulevard and within VHFHSZs; or sites in VHFHSZs that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ may be eligible for the incentives proposed as part of the Mixed Income Incentive Program only. Additionally, projects pursuing approvals pursuant to the provisions and procedures described in State Density Bonus Law in the proposed State Density Bonus Program and proposed Affordable Housing Incentive Program may be permitted in VHFHSZs, areas vulnerable to Sea Level Rise, and in sites within the Coastal Zone under certain circumstances. Figure 3 through Figure 12 show the opportunity corridor parcels in VHFHSZs that may be eligible for these incentives, whereas Figure 13 through Figure 16 show areas vulnerable to sea level rise.

The geographic distribution of the Proposed Project is in alignment with State law and the project studied in the Housing Element EIR regarding the overarching Affirmatively Furthering Fair Housing (AFFH) goal of prioritizing the identification of sites in Higher Opportunity Areas, as indicated in Figure 2. This was consistent with the Housing Element EIR, which found that some housing may occur in VHFHSZ over the plan period but not a significant amount. It is also consistent with the goals of the Housing Element for build out of the RHNA to occur in Higher Opportunity Areas in alignment with Program 121 described in *Section 2.3, Description of the Housing Element Rezoning Program Targeted Code Amendments (Proposed Project)*, of this Addendum.

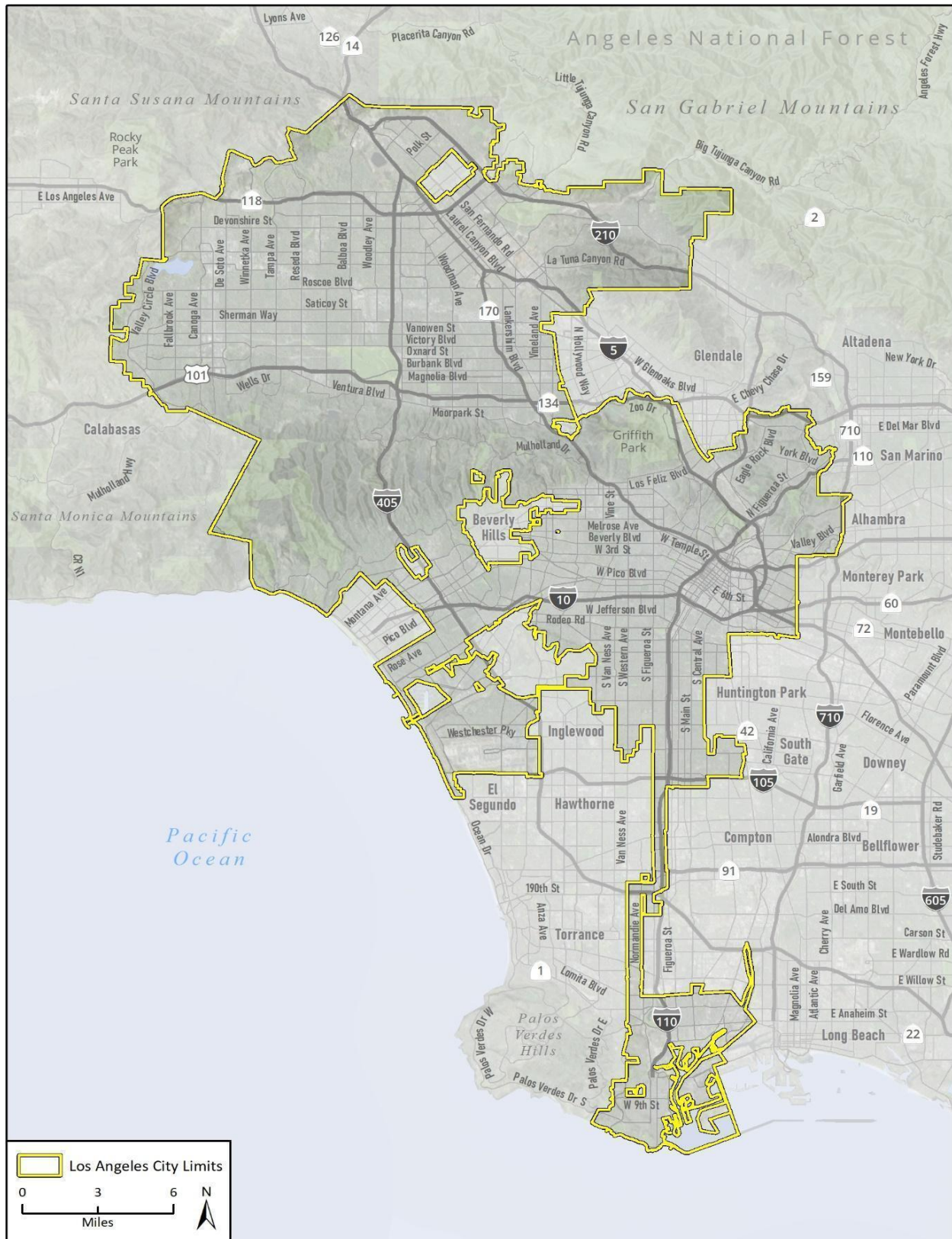
Figure 1 Regional Location

Fig. 1 Regional Location

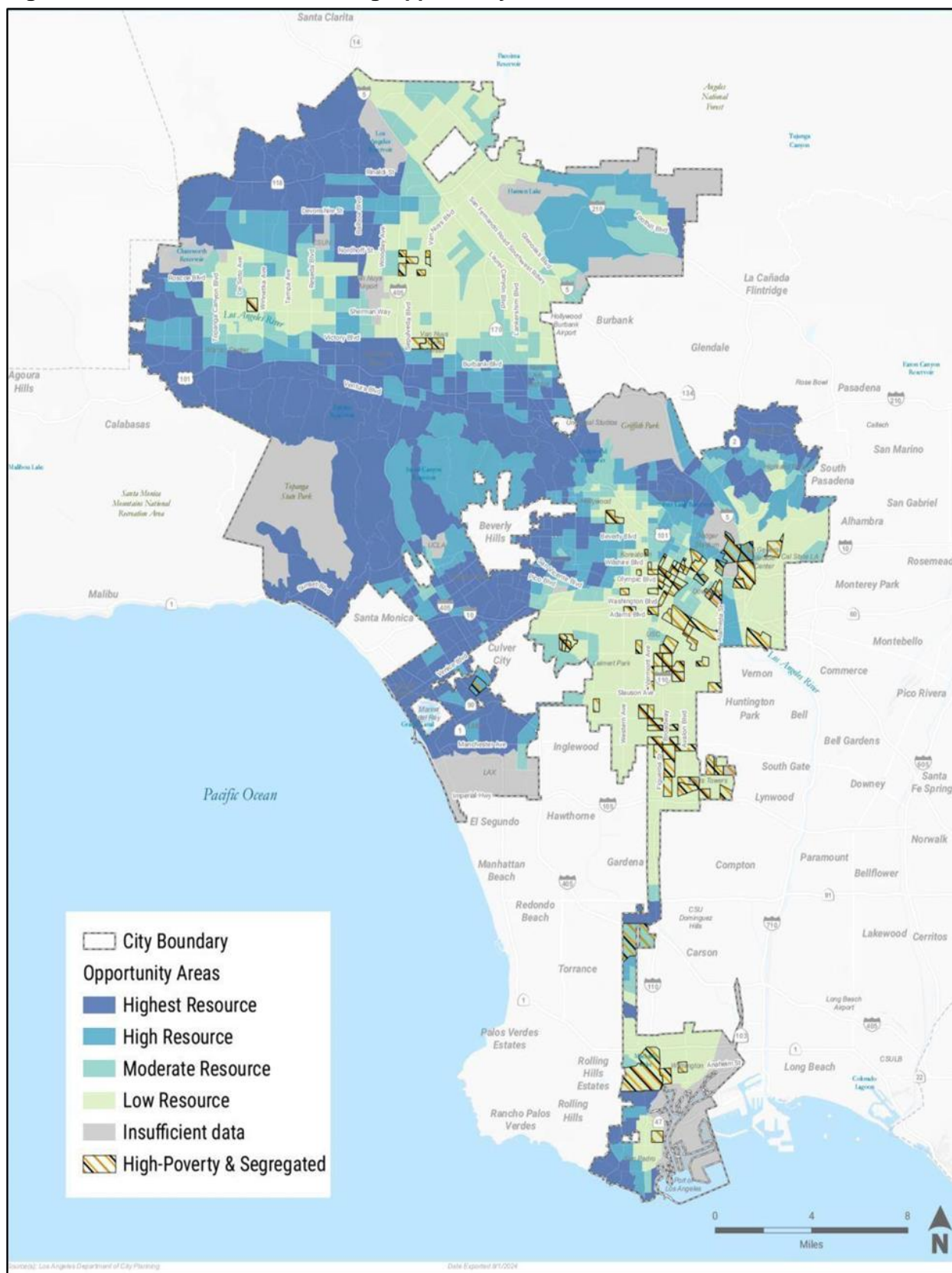
Figure 2 2024 TCAC/HCD Housing Opportunity Areas

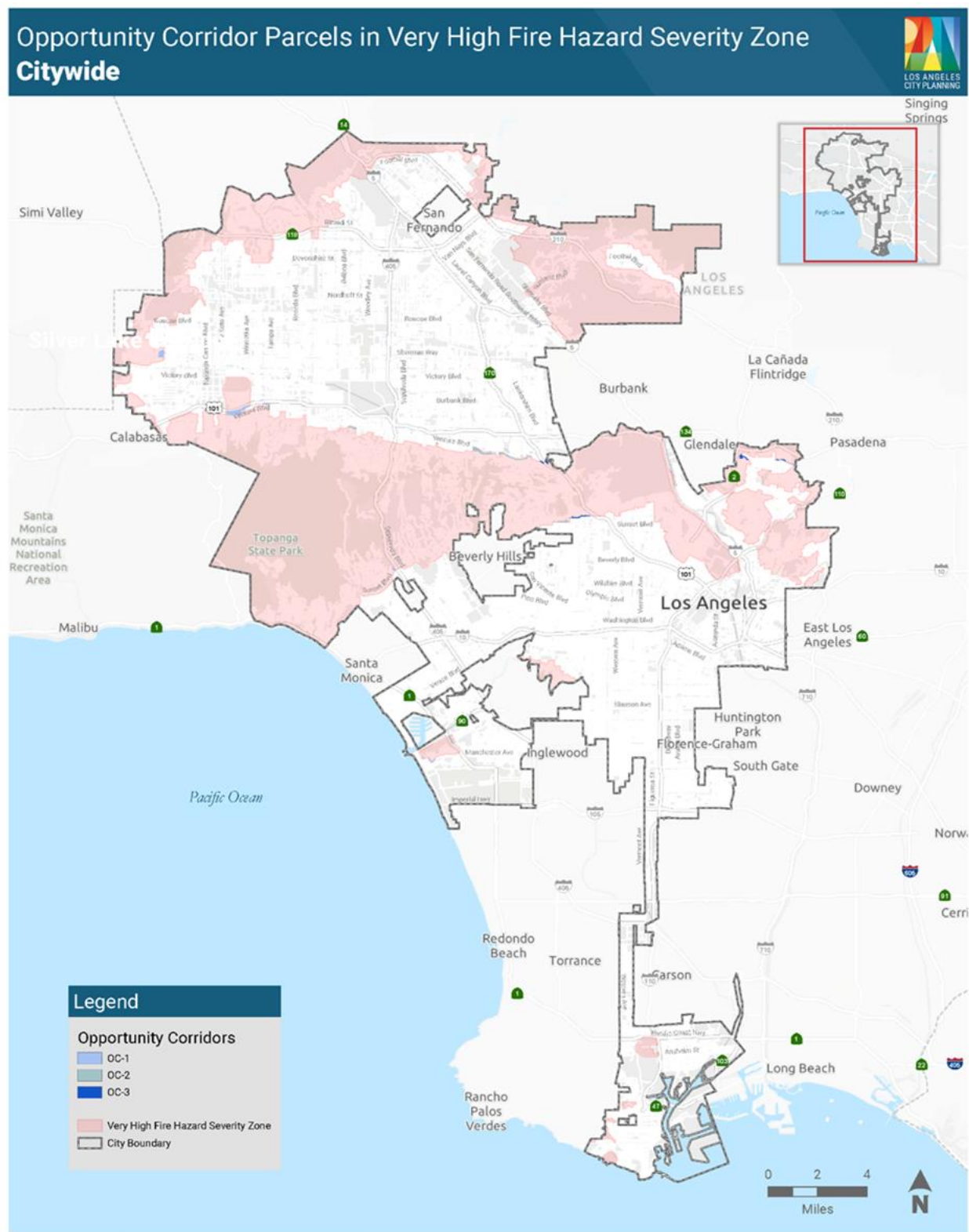
Figure 3 Very High Fire Hazard Severity Zones – Citywide

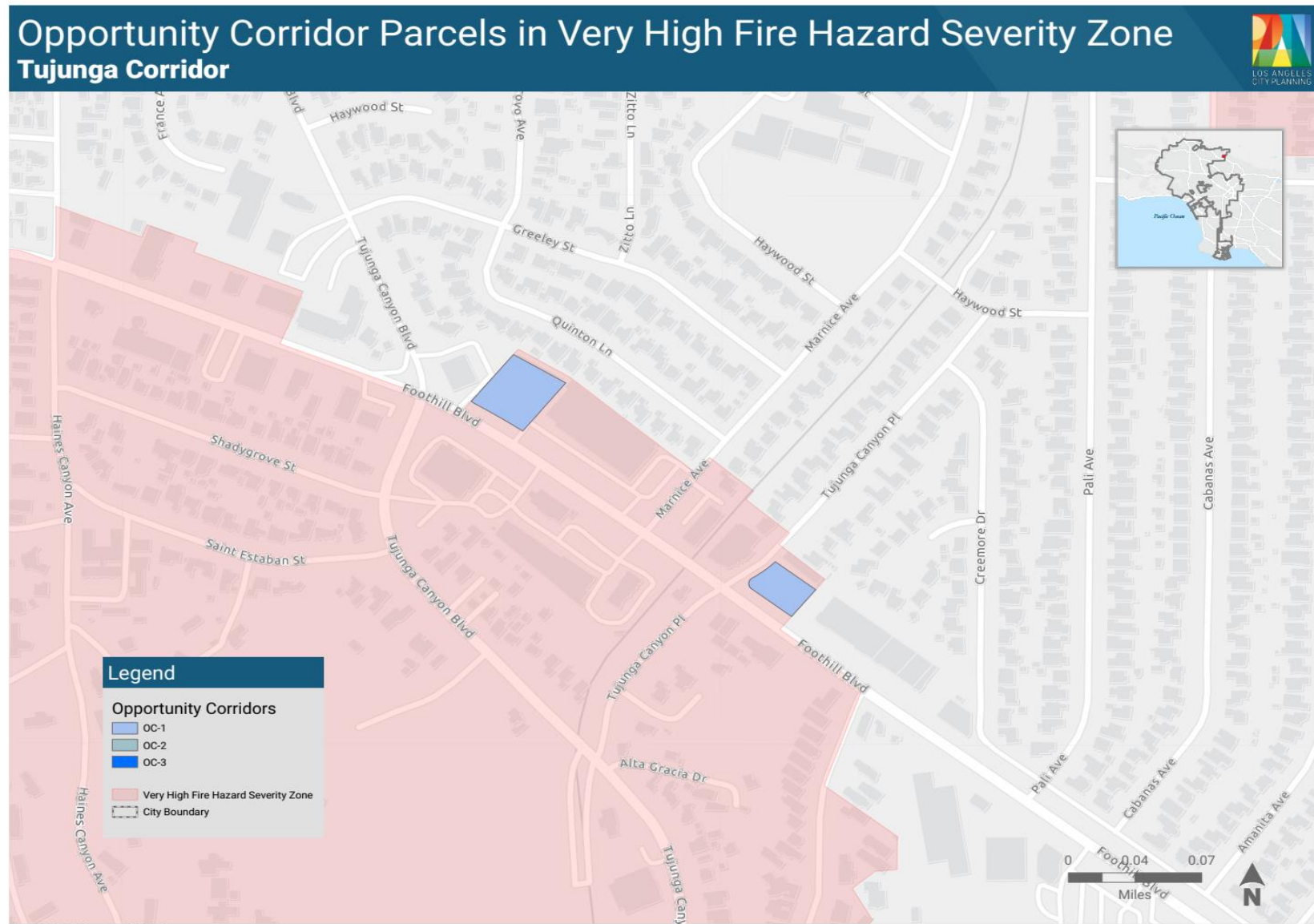
Figure 4 Very High Fire Hazard Severity Zones – Tujunga Corridor

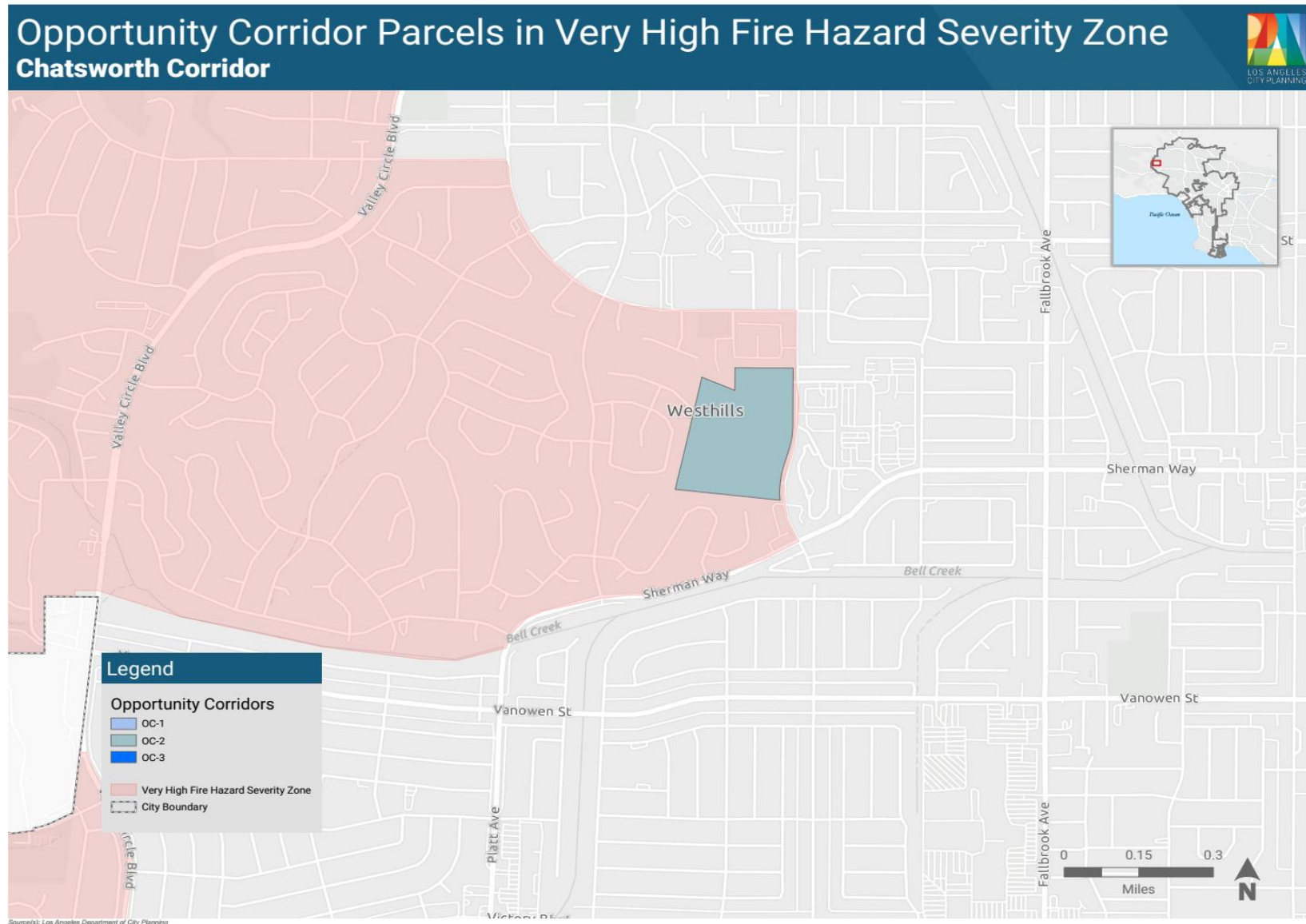
Figure 5 Very High Fire Hazard Severity Zones – Chatsworth Corridor

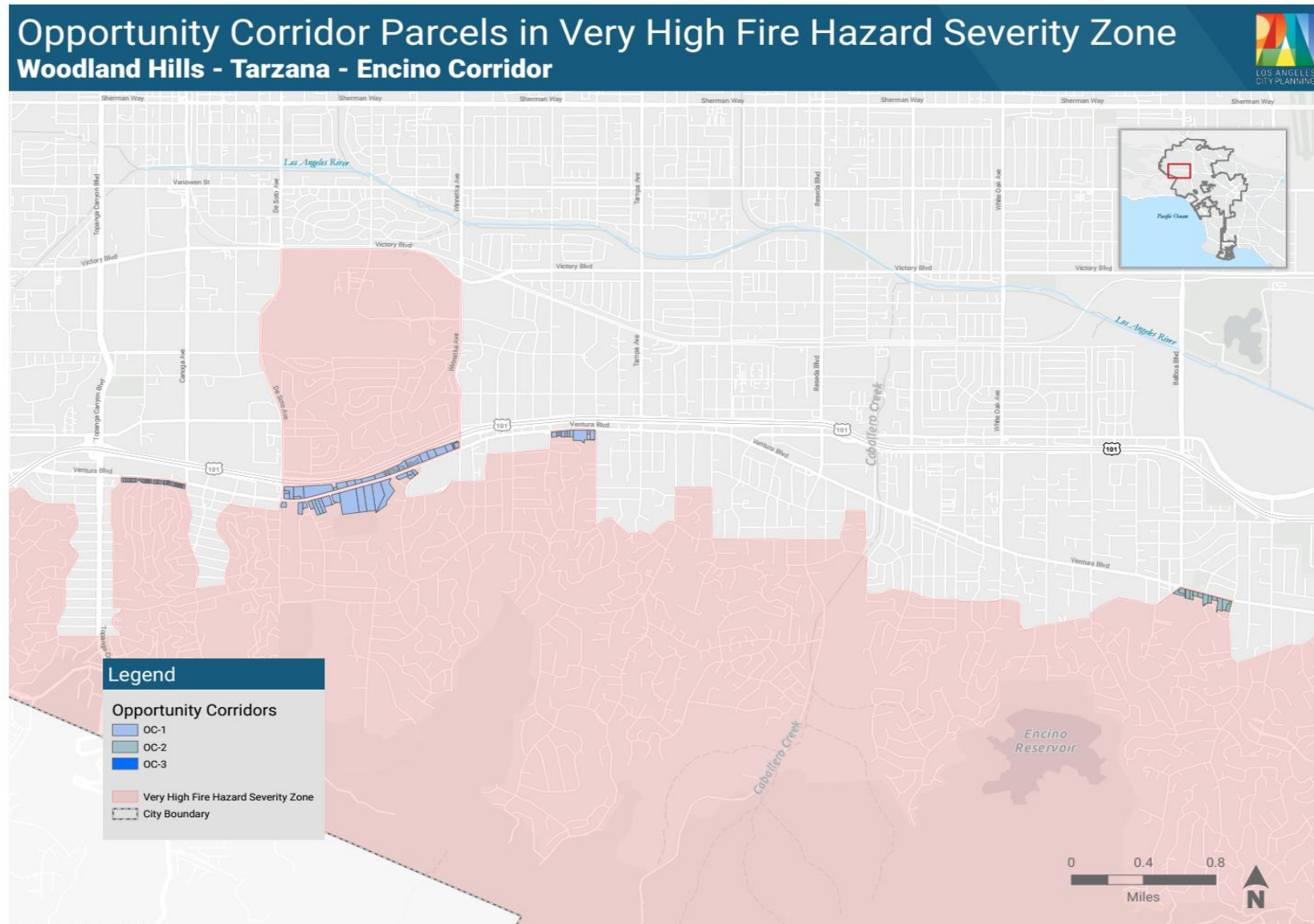
Figure 6 Very High Fire Hazard Severity Zones – Woodland Hills-Tarzana-Encino Corridor

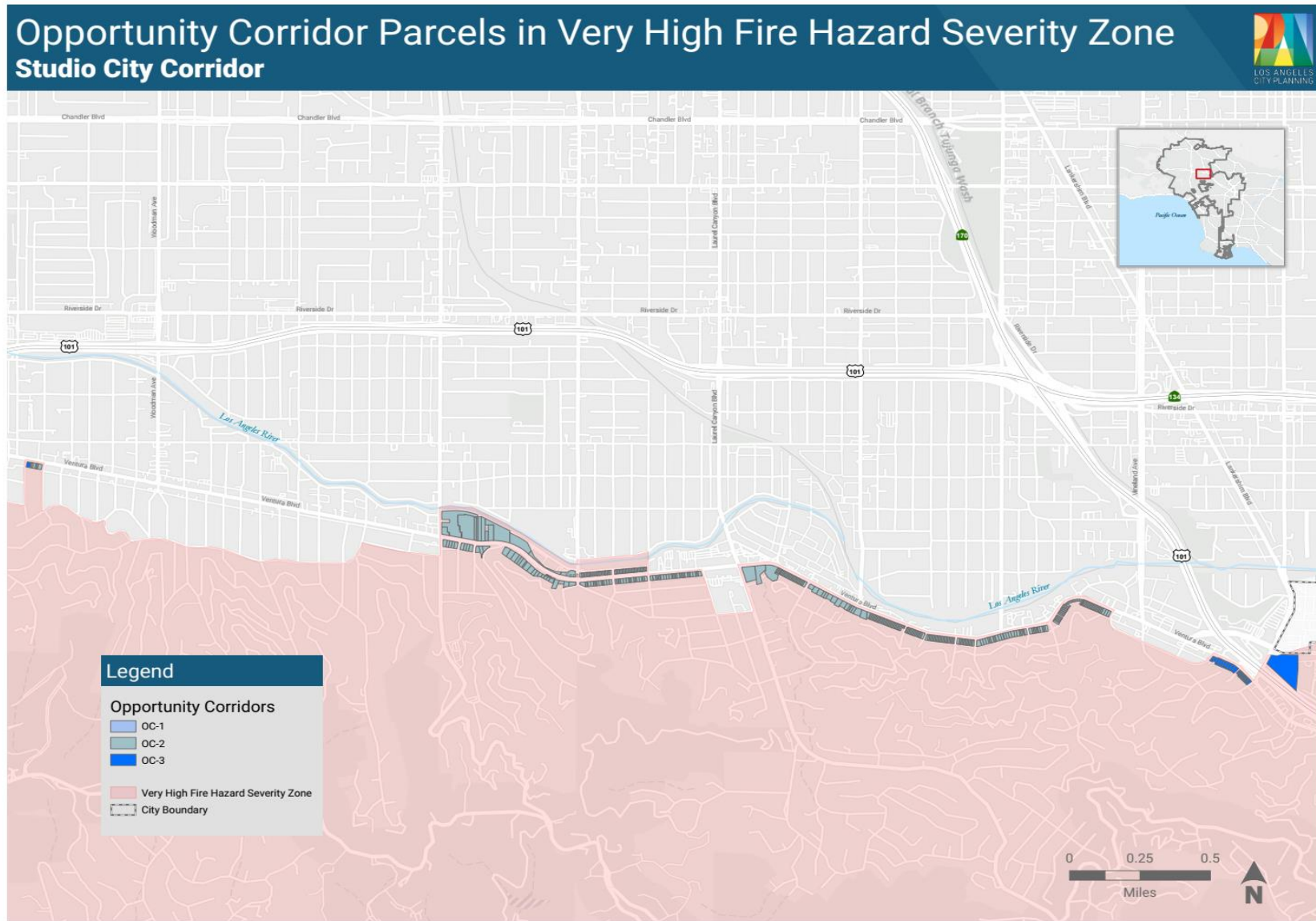
Figure 7 Very High Fire Hazard Severity Zones – Studio City Corridor

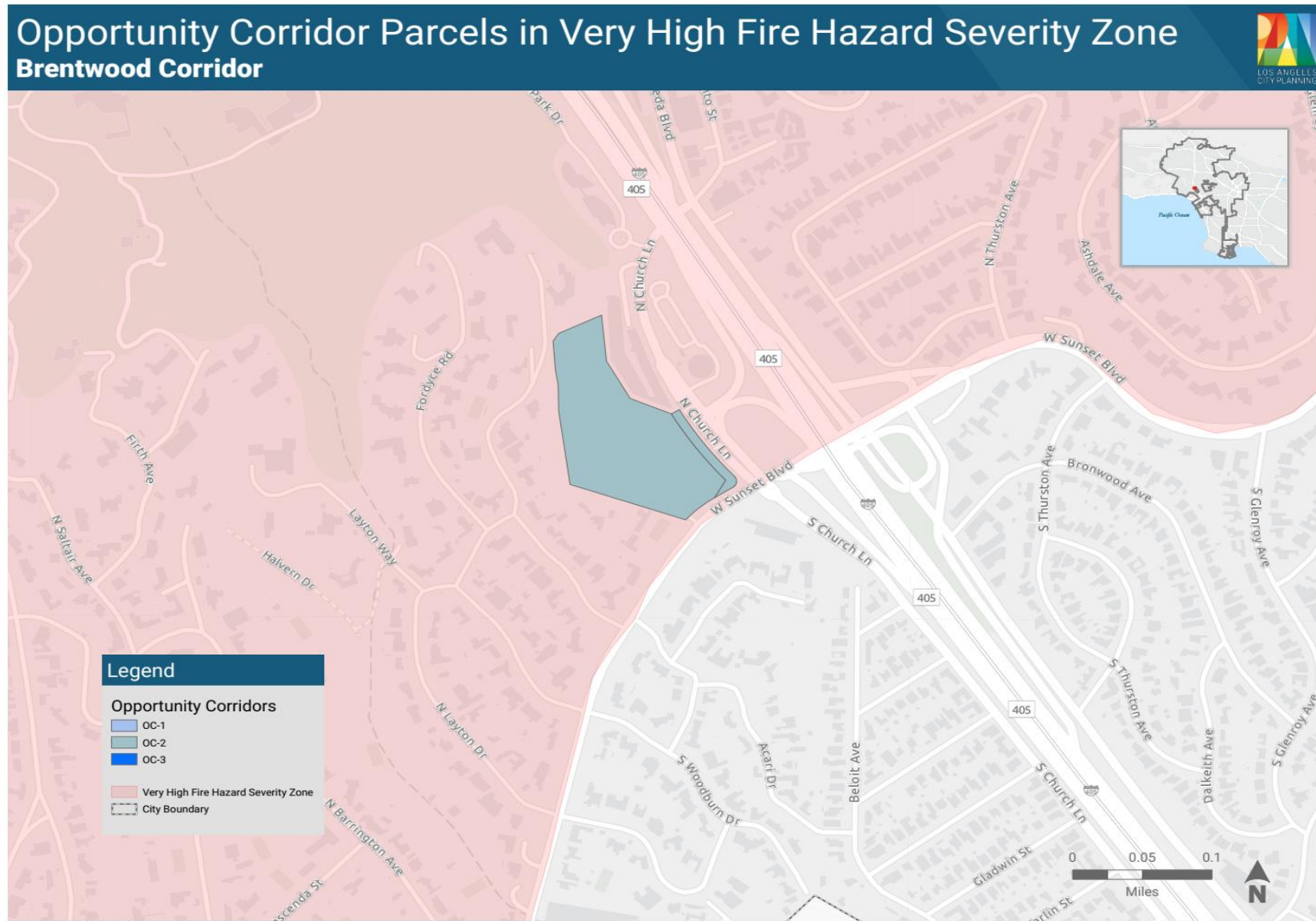
Figure 8 Very High Fire Hazard Severity Zones – Brentwood Corridor

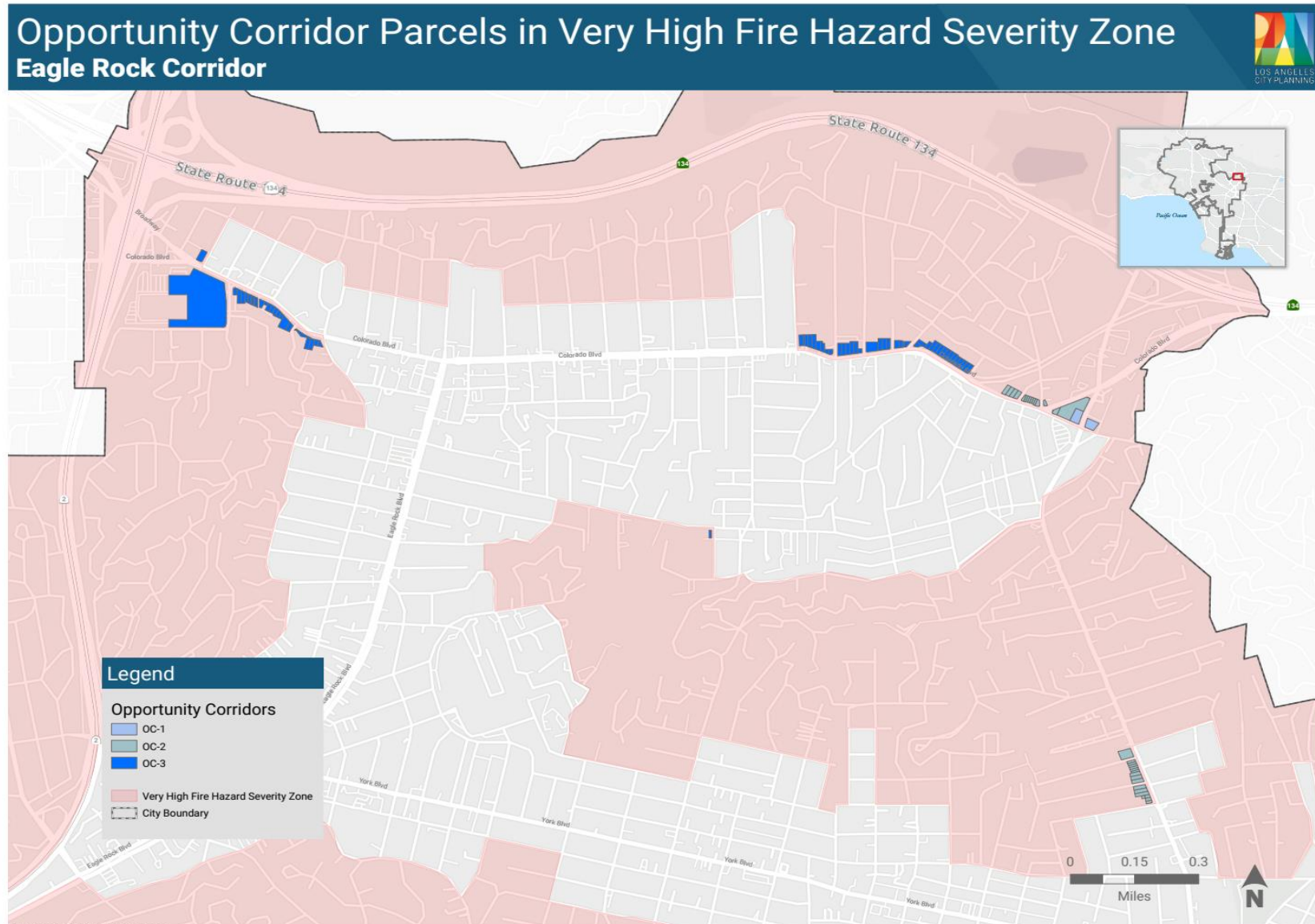
Figure 9 Very High Fire Hazard Severity Zones – Eagle Rock Corridor

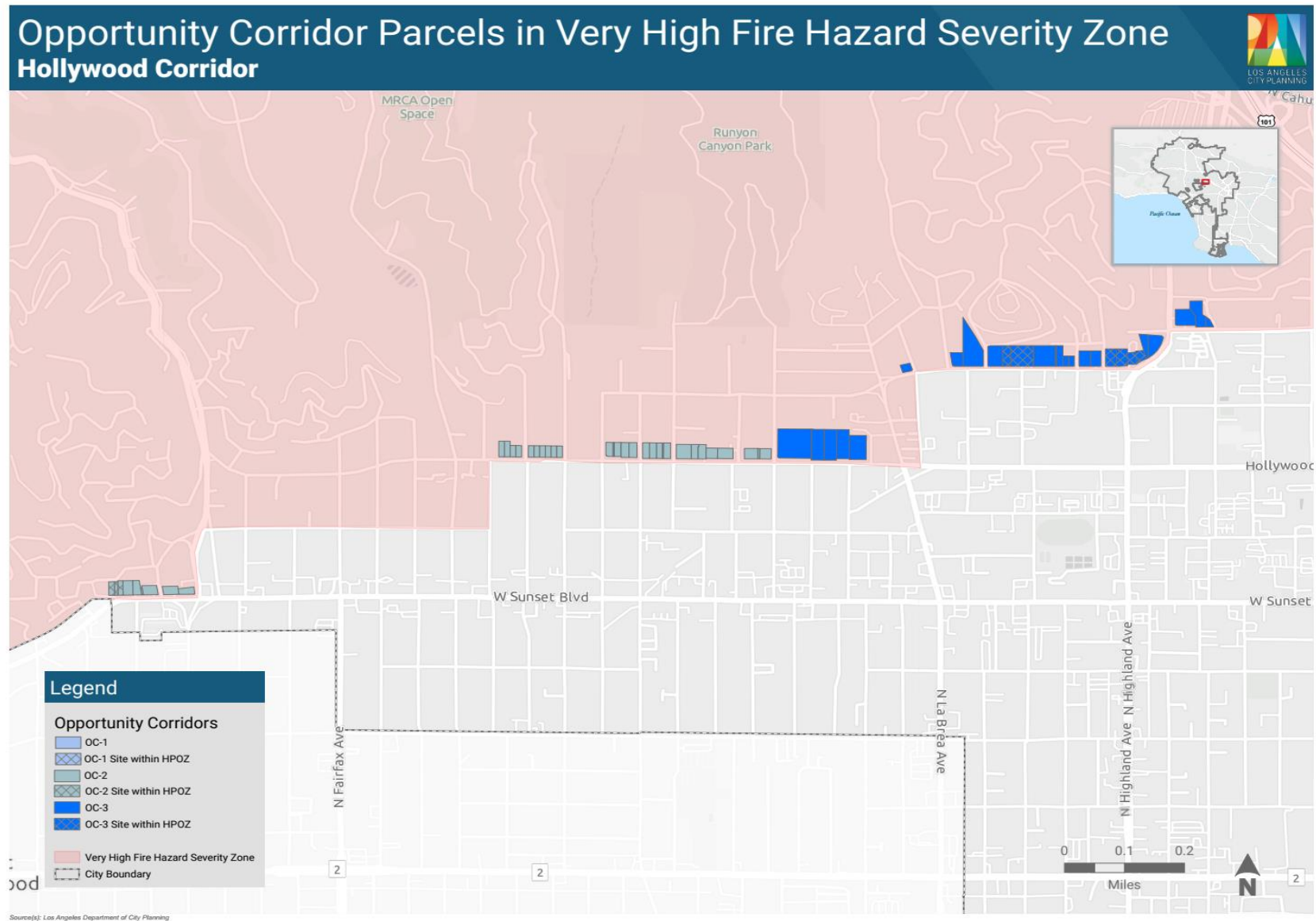
Figure 10 Very High Fire Hazard Severity Zones – Hollywood Corridor

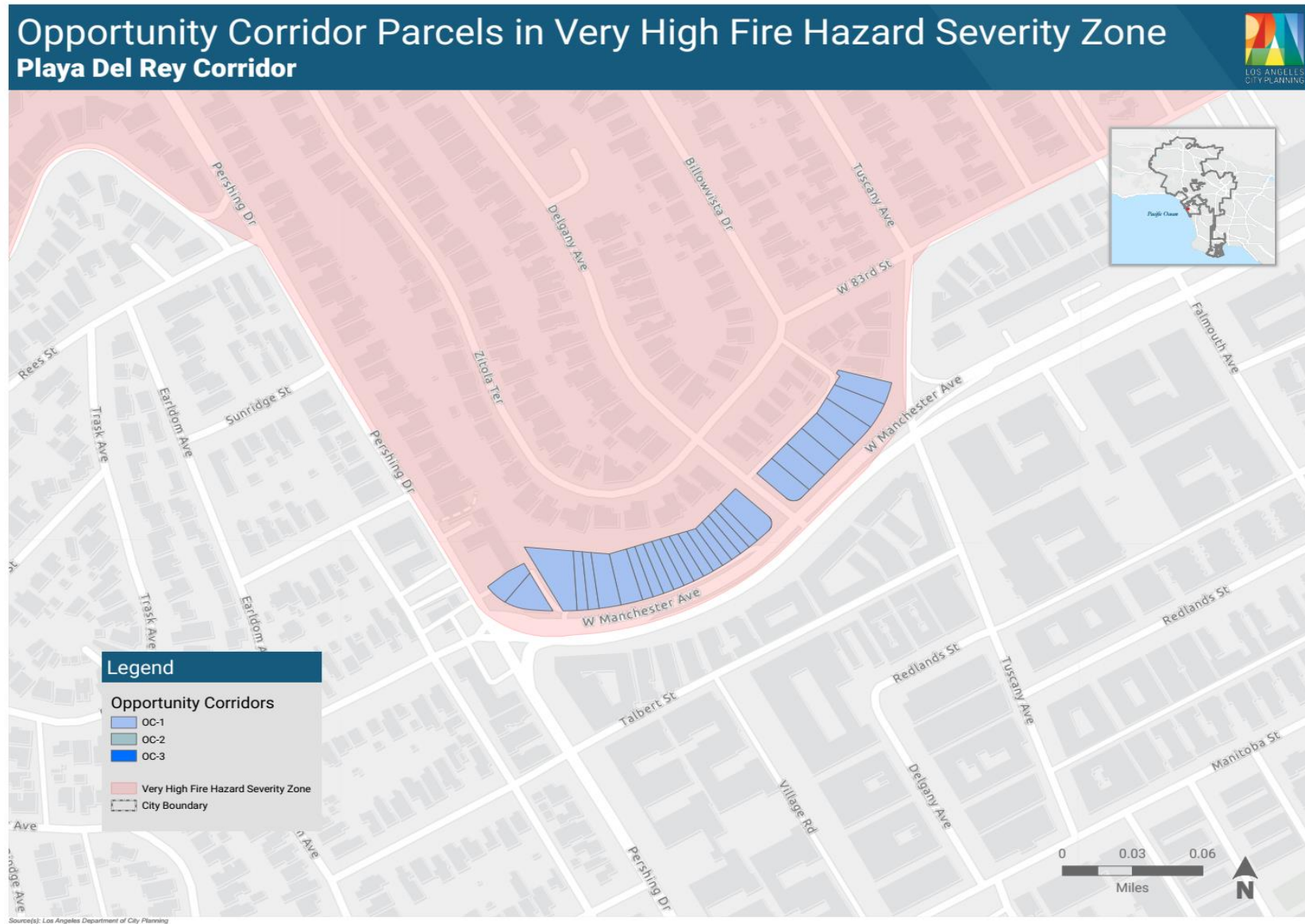
Figure 11 Very High Fire Hazard Severity Zones – Play Del Rey Corridor

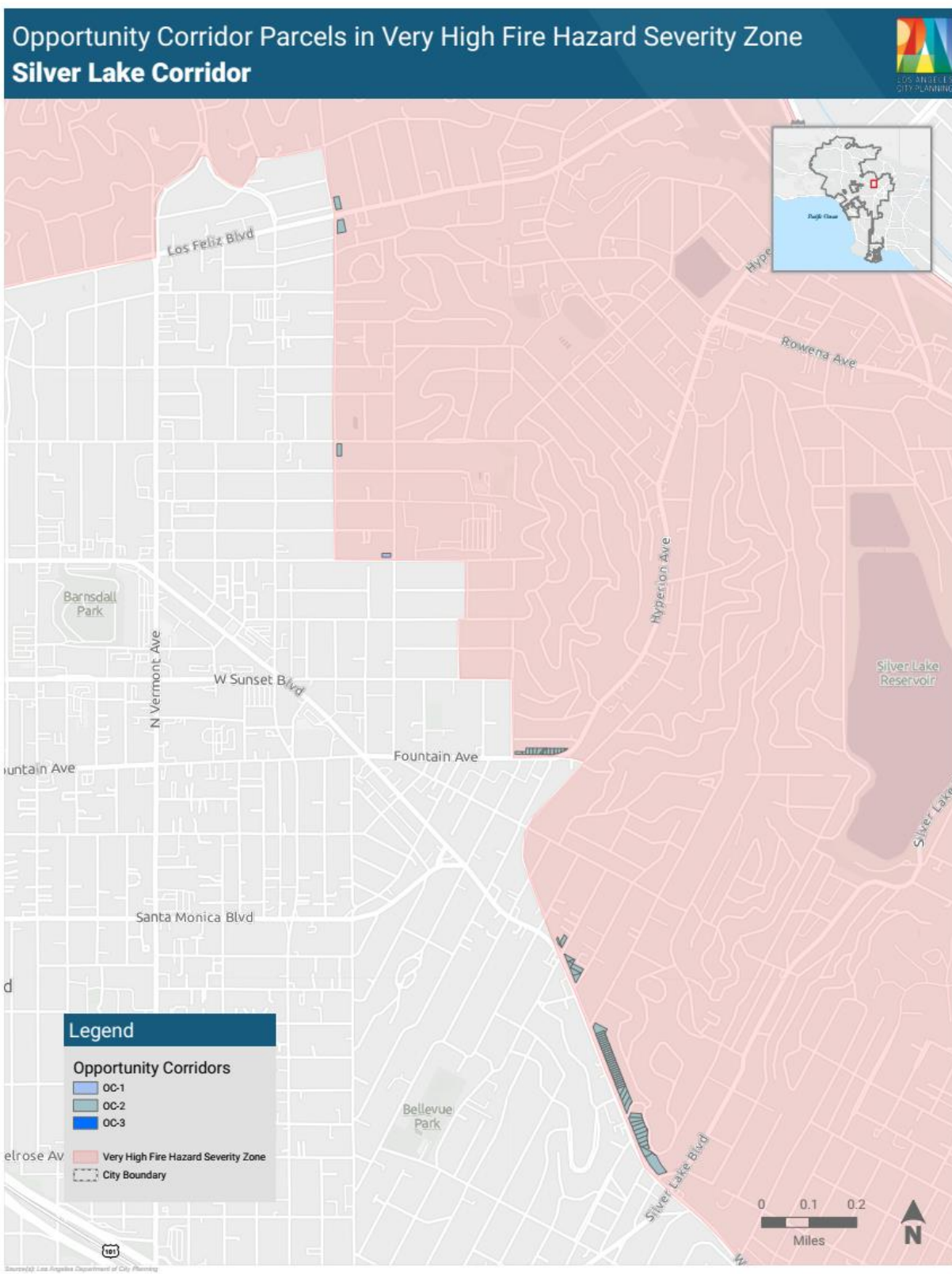
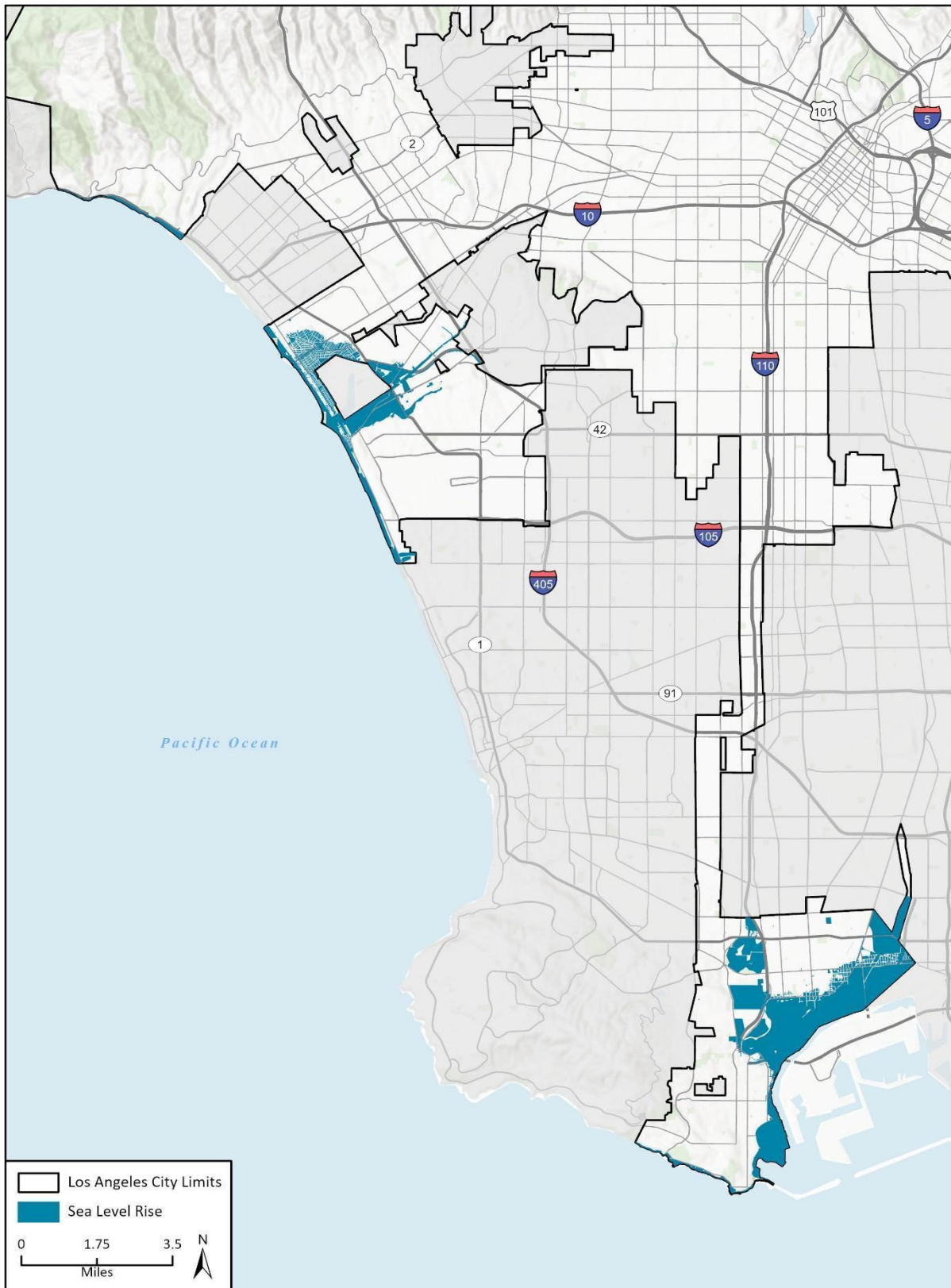
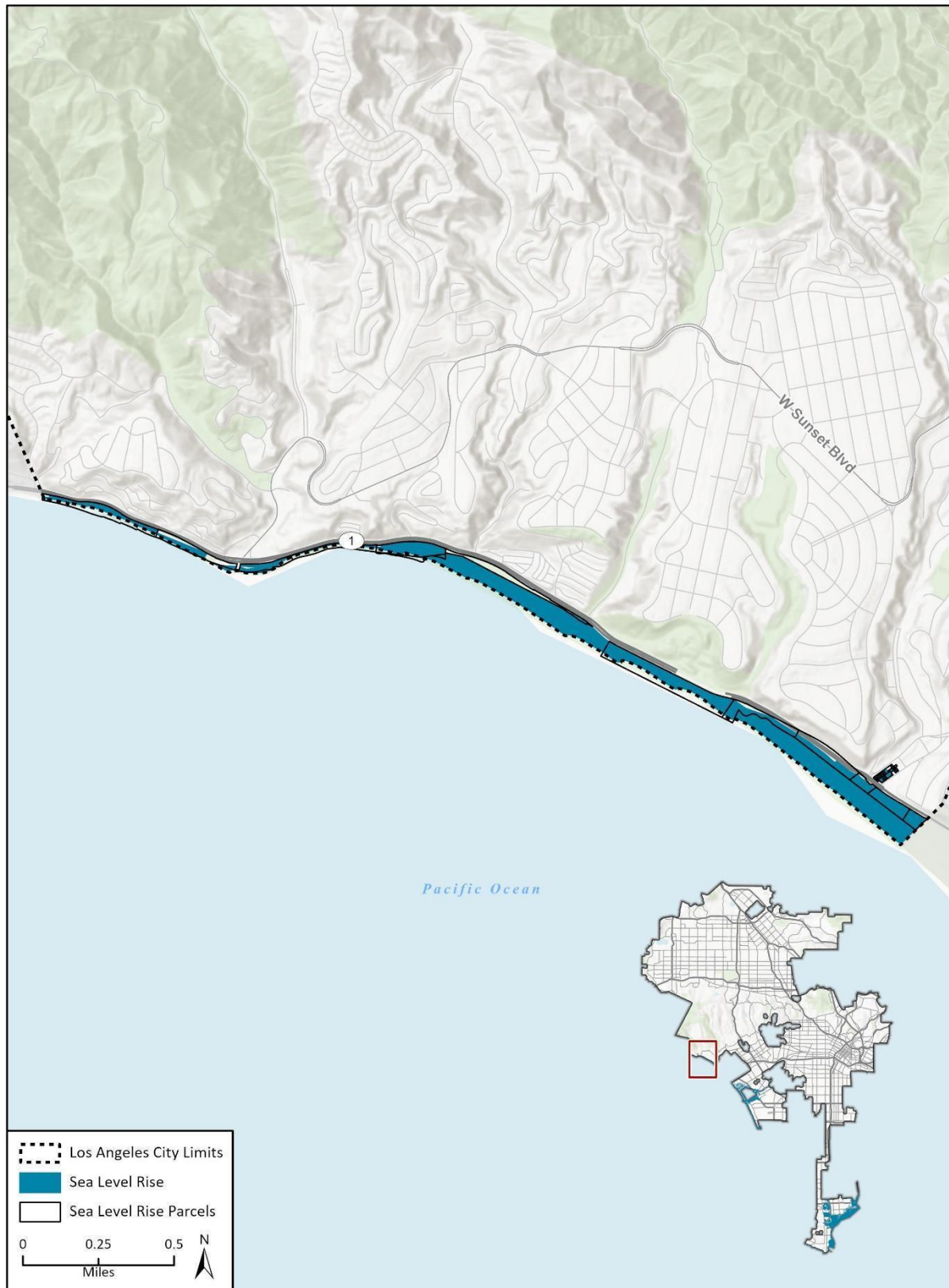
Figure 12 Very High Fire Hazard Severity Zones – Silver Lake Corridor

Figure 13 Areas Vulnerable to Sea Level Rise - Citywide

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Sea Level Rise data provided by City of Los Angeles, 2024.

22-12699 EPS
Fig X Sea Level Rise

Figure 14 Areas Vulnerable to Sea Level Rise – Santa Monica Bay

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Sea Level Rise data provided by City of Los Angeles, 2024.

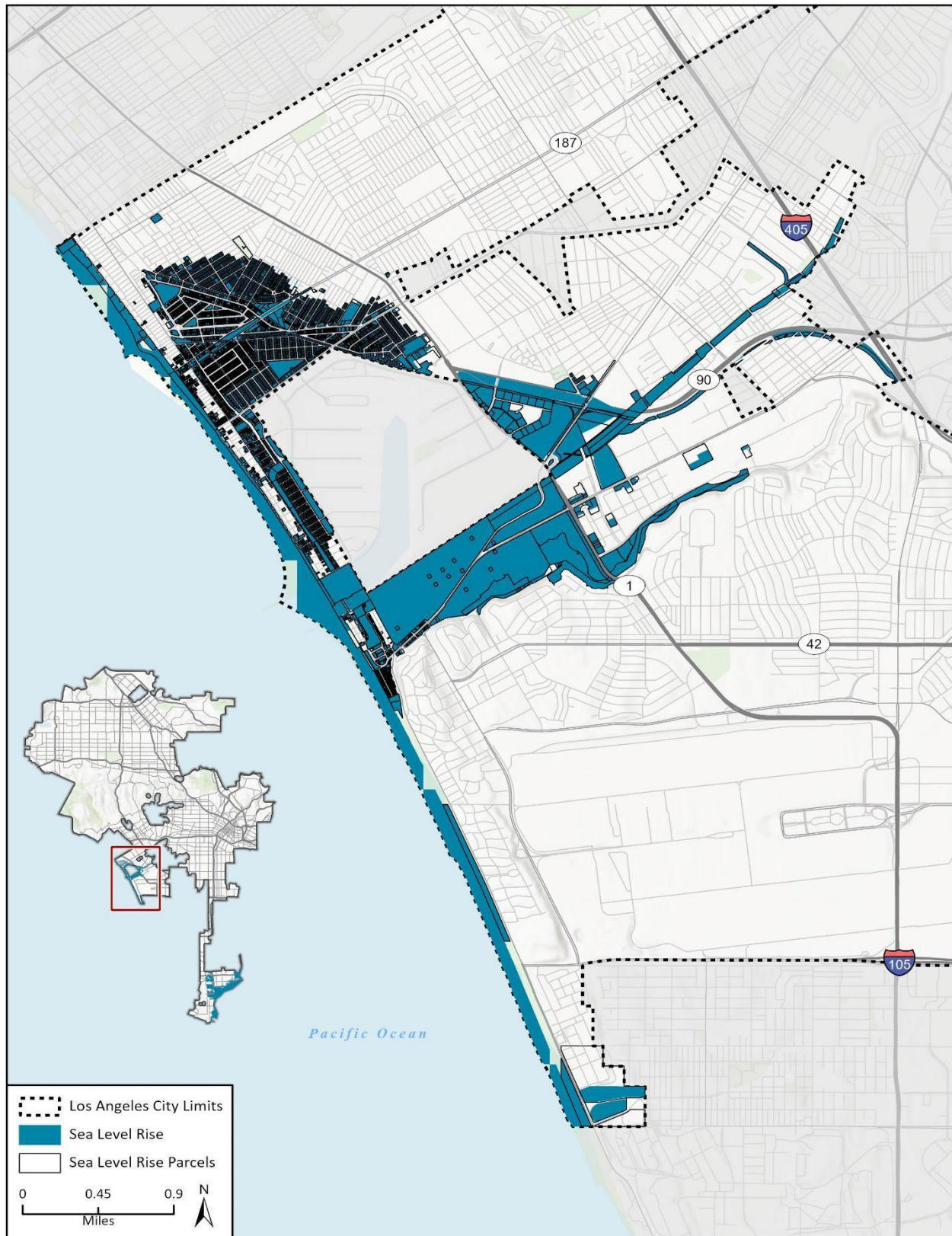
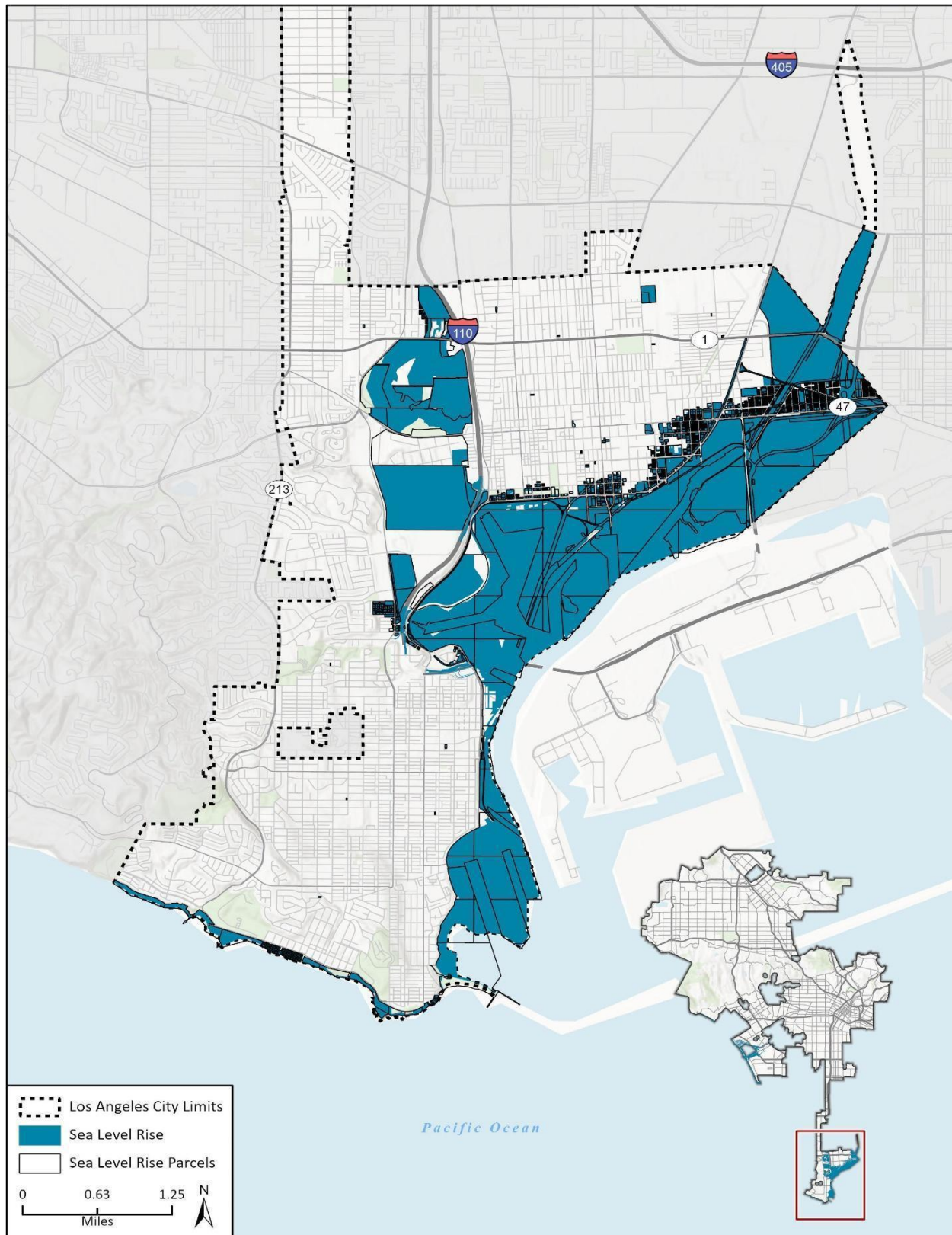
Figure 15 Areas Vulnerable to Sea Level Rise – Marina Del Rey

Figure 16 Areas Vulnerable to Sea Level Rise – Port of Long Beach

Imagery provided by Microsoft Bing and its licensors © 2024.
Sea Level Rise data provided by City of Los Angeles, 2024.

2.2 EXISTING SITE CHARACTERISTICS

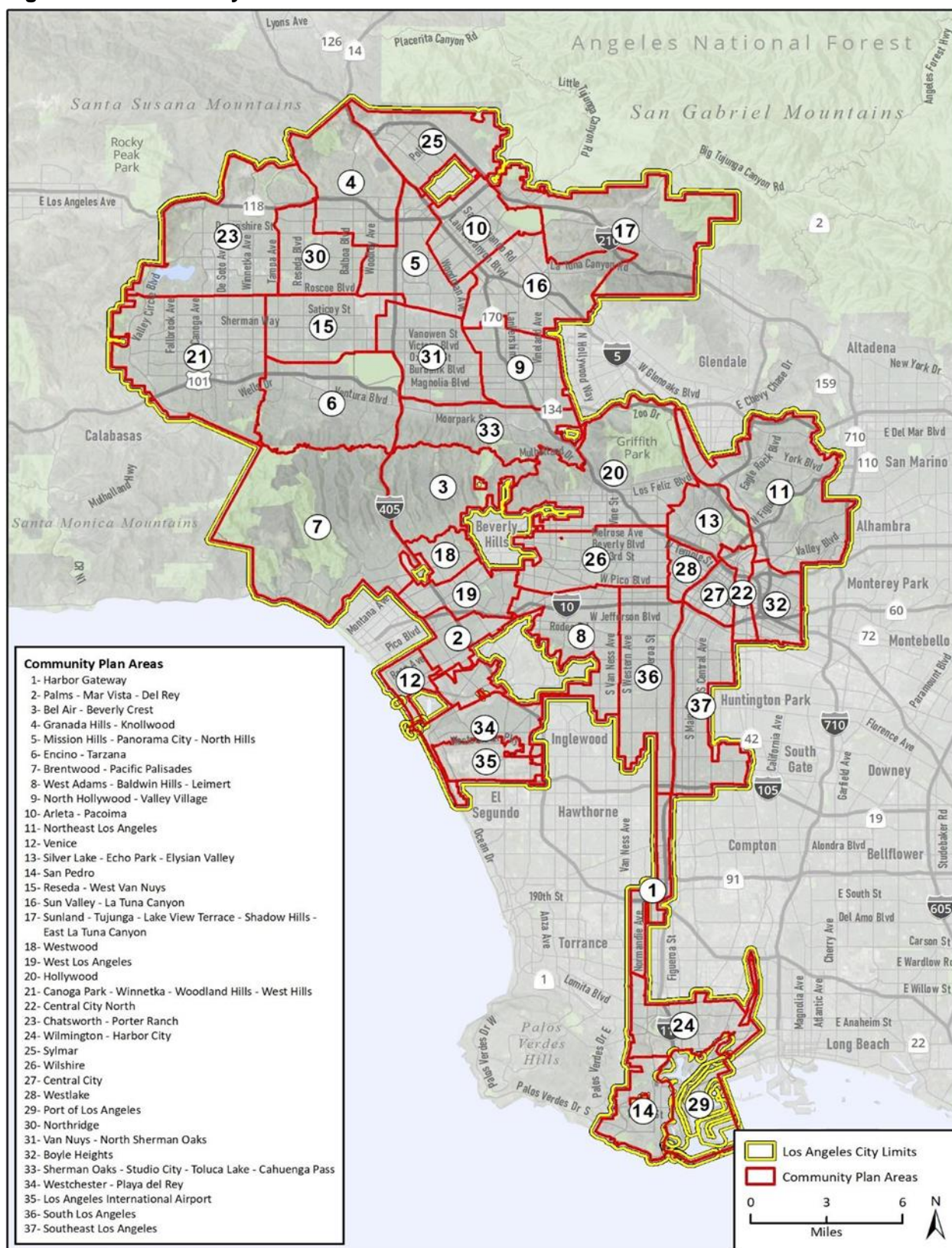
Current Land Use Designation and Zoning

The City of Los Angeles is highly urbanized and contains a variety of residential, civic, commercial, industrial, and open space uses within the communities that comprise the City. Land Use designations are established by the General Plan Land Use Element, which contains 35 Community Plans for the Community Plan Areas within the City (34 upon the operative date of the Downtown Community Update). These Community Plans are currently being updated. Figure 17 illustrates the boundaries of the Community Plan Areas.

Zoning designations are established in the LAMC Chapter 1, Article 2 (Zoning Code) and Chapter 1A (the City's new Zoning Code which will apply to properties in the City as Community Plans are updated). The Proposed Project would amend the Zoning Code to provide for additional capacity for housing development within the City, as further discussed in *Section 2.3, Description of the Housing Element Rezoning Program Targeted Code Amendments (Proposed Project)*. Residential zones established in the LAMC include Suburban (RS), Residential Estate (RE), One-family (R1), Residential Urban (RU), Residential Zero Side Yard (RZ), Residential Waterways (RW1 and RW2), Two-family (R2), Restricted Density Multiple Dwelling (RD), Mobilehome Park (RMP), Multiple Dwelling (R3, R4, and R5), and Residential/Accessory Services (RAS3 and RAS4). Additionally, Commercial (C) Zones permit residential uses. Furthermore, certain Specific Plans have introduced new zoning classifications that allow for residential uses. These include the Urban Village (UV[CA]), Urban Innovation (UI[CA]), and Urban Center (UC[CA]) zones in the Cornfield Arroyo Seco Specific Plan as well as the Hybrid Industrial: Job Emphasis (HJ[EC]), Hybrid Industrial: Residential Emphasis (HR[EC]), Mixed Use: Commercial/Residential (MU[EC]), Neighborhood Mixed Use: Commercial/Residential (NMU[EC]), and Multiple Dwelling (R3[EC]) zones in the Exposition Corridor Transit Neighborhood Plan. The Proposed Project would allow for increased housing development in these zones through the codification of incentive-based tools in order to accommodate the necessary housing growth in the City. Figure 18 and Figure 19 illustrate the pattern of existing land use designations and zoning throughout the city.

Surrounding Land Uses

The City is generally surrounded by the San Gabriel Mountains to the north; urban development and the Verdugo Mountains, San Rafael Hills and San Gabriel Valley to the east; and urban development and the Santa Susana Mountains, Santa Monica Mountains and Pacific Ocean to the west and south.

Figure 17 Community Plan Boundaries

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 Additional data provided by Los Angeles County, 2020.

Fig 2-1 Community Plan Boundaries

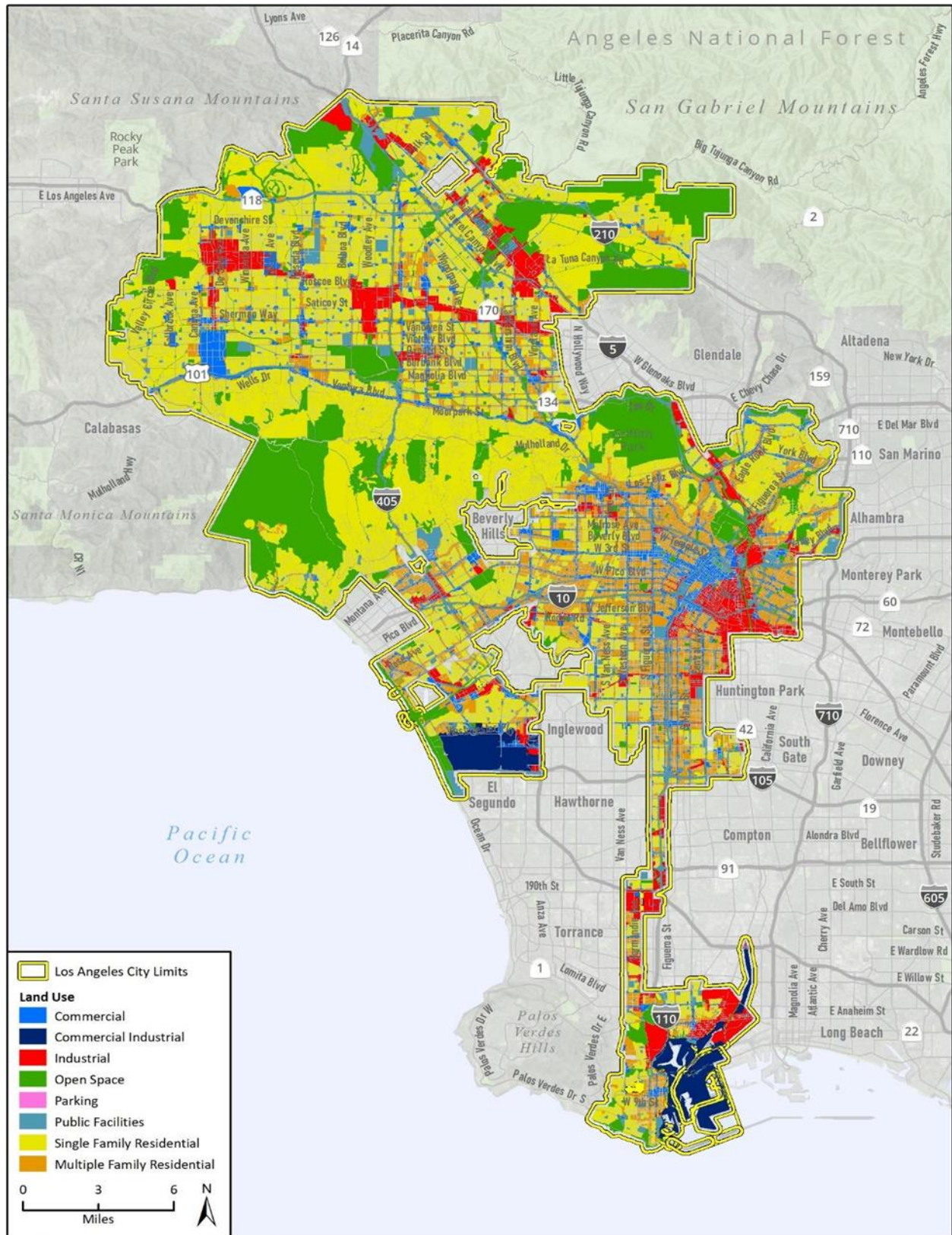
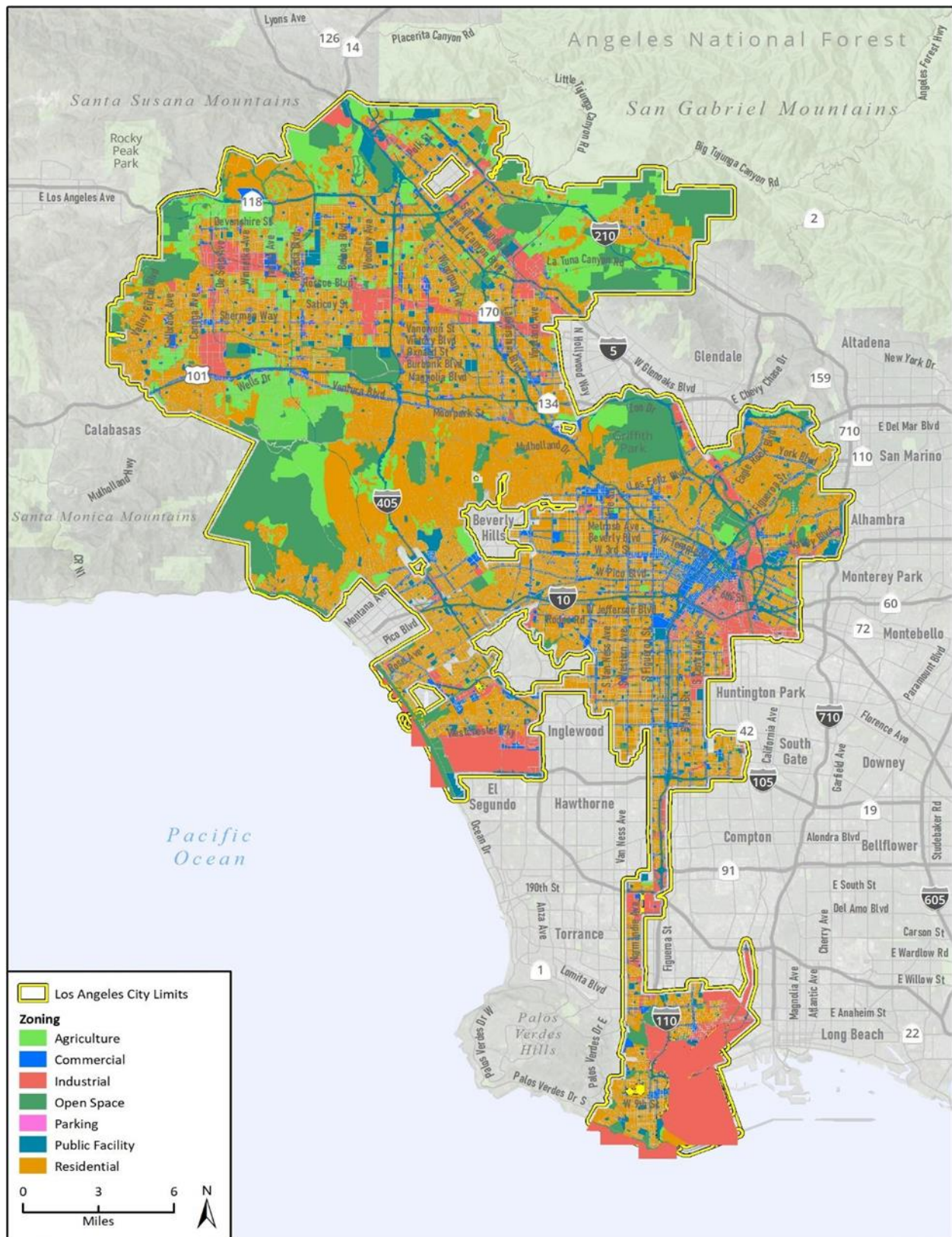
Figure 18 Land Use Designations Within the City

Fig 2-2 Land Use

Figure 19 Zoning Map of the City

Imagery provided by Esri and its licensors © 2020.
Additional data provided by Los Angeles County, 2020.

Fig 2-3 Zoning

2.3 DESCRIPTION OF THE HOUSING ELEMENT REZONING PROGRAM TARGETED CODE AMENDMENTS (PROPOSED PROJECT)

Summary

As discussed under *Section 1.2, Housing Element Update and the Housing Element EIR*, the City is required to provide the zoned capacity to accommodate the development of at least 456,643 residential units using various land use planning strategies to meet the RHNA allocation. The City's 2021-2029 Housing Element evaluated sites with the potential to be developed with housing during the planning period, and as a result identified a need for a Housing Element Rezoning Program to accommodate 255,432 units of housing capacity to meet the RHNA allocation. The Housing Element Rezoning Program is consistent with the program previously identified in the 2021-2029 Housing Element and described in the Housing Element EIR. The Housing Element Rezoning Program consists of several key work efforts, including ongoing and parallel initiatives to update the City's Community Plans, Transit Neighborhood Plans, and Specific Plans. Furthermore, the Housing Element Rezoning Program encompasses parallel citywide rezoning efforts, including the Proposed Project. The Proposed Project is a citywide policy effort that would create new affordable housing incentives, as well as make updates to the City's existing incentive-based housing development programs, through four ordinances, which entail amendments to both Chapter 1 and Chapter 1A of the LAMC.

Specifically, the Proposed Project proposes:

- The CHIP Ordinance which includes a substantial revision to the City's State Density Bonus Law implementation program; the creation of a new Mixed Income Incentive Program, and the establishment of a new Affordable Housing Incentive Program; and authorization for Director of Planning to adopt Environmental Protection Measures for Housing Development Projects.
- An expansion to the City's existing Adaptive Reuse Ordinance;
- A Housing Element Sites and Minimum Density Ordinance; and
- A Resident Protections Ordinance

The above ordinances include proposed revisions to the Zoning Code's processes and procedures contained in Article 13 of Chapter 1A of the LAMC. More information on the listed ordinances can be found in the following *Additional Information on the Proposed Project* section.

Adoption of the ordinances that comprise the Proposed Project supports several programs in the City's 2021-2029 Housing Element:

- **Program 121 (RHNA Re-zoning)** calls for the Department of City Planning to identify and recommend rezoning for the remaining RHNA of 255,432 units. This includes a range of strategies including the Proposed Project that would create additional zoning capacity through an expansion of affordable housing incentive programs, creation of new incentive programs, enhancement of existing housing development programs, and strengthening of community benefits and tenant protections.
- **Program 48 (Update Density Bonus and Other Affordable Housing Incentive Programs)** calls for the Department of City Planning to pursue an update to the Density Bonus Ordinance and existing incentive-based programs aimed at creating more affordable housing.
- **Program 103 (Missing Middle)** calls for the creation of flexible zoning standards to facilitate more low-scale multi-unit housing typologies.

- **Program 13 (Adaptive Reuse)** calls for the Department of City Planning to expand the opportunities for adaptive reuse of commercial and office buildings citywide for housing by preparing revisions to the Citywide Adaptive Reuse Ordinance and/or the Density Bonus Ordinance, to include incentives and provisions for adaptive re-use by 2023.
- **Program 61 (Provide Adequate Sites for Lower income Households on Nonvacant and Vacant Sites Previously Identified)** describes rezoning needed to allow developments by-right pursuant to California Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower income households. This would apply to sites identified in the Inventory of Adequate Sites for Housing (Appendix 4.1) to accommodate the lower income RHNA that were previously identified in past housing elements.
- **Program 29 (Enforcement of No Net Loss and Affordable Housing Replacements Requirement)** calls for the City to codify and consider expanding existing housing replacement requirements to provide one-for-one replacement of Rent Stabilized housing units.
- **Program 54 (Expedite Affordable Housing Projects)** calls for the expeditious review and approval for entitlements and permits associated with projects containing covenanted affordable housing units.
- **Program 15 (Public Land for Affordable Housing)** calls for expanding the utilization of publicly owned land for the provision of affordable housing especially in areas vulnerable to displacement pressures. Program 15 proposes modifying the use limitations of the “PF” Public Facilities zone to allow for affordable housing by-right.
- **Program 57 (Improvements to Development Processing)** calls for interdepartmental coordination to increase the number of cases that can be processed ministerially and reduce project review time.
- **Program 62 (Facilitate Housing Innovation)** calls for modifications in the Zoning Code to incentivize and facilitate innovative housing types.
- **Program 122 (Anti-Displacement Strategies)** calls for the Department of City Planning and Housing Department to develop policy strategies to strengthen tenant protections and to preserve and increase the stock of affordable housing to protect vulnerable communities facing displacement.
- **Program 124 (Affirmatively Furthering Fair Housing)** calls for the Department of City Planning to comply with federal Department of Housing and Urban Development requirements to promote and AFFH opportunities by taking actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict opportunity.
- **Program 28 (Replacement Program for Selected Sites)** calls for the Department of City Planning to require new housing developments on sites identified in the site inventory to replace all affordable housing units when certain conditions are met.
- **Program 45 (Enforce, Monitor and Preserve Affordable Housing Covenants)** calls for the Department of City Planning and Housing Department to continue to maintain a database of existing covenanted affordable housing units citywide, and to monitor and enforce compliance with affordability and accessibility covenants.
- **Program 46 (Inventory of Housing Element Sites Update)** calls for the Department of City Planning to identify parcels included in the Housing Element Inventory of Sites on the City’s Zone Information and Map Access System (ZIMAS) database, and to monitor and track the redevelopment of sites on the inventory throughout the planning period.
- **Program 87 (Strengthen Enforcement of Ellis Act Provisions)** calls for the Department of City Planning and Housing Department to strengthen Ellis Act monitoring and enforcement to

preserve Rent Stabilization Ordinance (RSO) housing units, prevent tenant displacement, and ensure relocation assistance to tenants.

- **Program 43 (Historic Preservation)** calls for the Department of City Planning to designate historic and culturally significant resources and to explore incentives for the rehabilitation and adaptive reuse of historic resources and programs for low-income homeowners of historic properties in Historic Preservation Overlay Zones.
- **Program 9 (Facilitate Housing for Senior and Disabled Persons)** calls for the Department of City Planning to explore and implement measures to better streamline developments that propose housing for senior citizens.

The Proposed Project does not propose any Zone Changes or Plan Amendments and would instead offer a range of zoning incentives and streamlining measures to build on existing zoning parameters to promote the production of housing, particularly income restricted affordable housing. As identified in the Housing Element, the Proposed Project is Citywide with a focus on qualified sites located in Higher Opportunity Areas in alignment with AFFH objectives as discussed in the 2021-2029 Housing Element and required under State law.

Citywide Housing Incentive Program Ordinance

The CHIP Ordinance encompasses three critical programs including revisions to the City's local Density Bonus ordinance (or State Density Bonus Program), a new Mixed Income Incentive Program, and a new Affordable Housing Incentive Program. The Ordinance as a whole would serve as a local implementation program of State Density Bonus Law (California Government Code Sections 65915-65918). The State Density Bonus Program would function as a direct implementation mechanism for the provisions of State Density Bonus Law. The Mixed Income Incentive Program would establish different project eligibility criteria and provide development bonuses in compliance with California Government Code Section 65915(n) which allows local jurisdictions to provide greater density bonuses for projects providing affordable housing in accordance with State Density Bonus Law. The Affordable Housing Incentive Program proposes to both codify incentives for One Hundred Percent Affordable Housing Developments under State Density Bonus Law in addition to the codification of greater development bonuses for projects developed by Faith Based Organizations and projects in Higher Opportunity Areas. Underpinning all programs in the CHIP Ordinance is a focus on process streamlining. With this in mind, all program strategies aim to remove procedural barriers and create efficient and expedited processes for projects creating new housing units that align with City priorities and objectives. This is proposed to be accomplished through expanded access to administrative ministerial planning review processes for projects that meet objective zoning standards and comply with the CHIP Ordinance's incentive limitations. In addition to the three aforementioned programs that comprise the CHIP Ordinance, the Ordinance puts forth technical amendments aimed to support the utilization of CHIP Ordinance incentives. Key technical amendments include:

- A proposed exemption from the LAMC's Project Review requirements for multi-family developments if a proposed project provides restricted affordable units consistent with the requirements associated with an exemption from the Affordable Housing Linkage fee.
- A proposed amendment to the Affordable Housing Linkage Fee provisions of the LAMC (LAMC Section 19.18) that would allow any Mixed Income Incentive Program Project consistent with the proposed LAMC Section 12.22 A.38 to be exempt from the Affordable Housing Linkage Fee.
- A proposed ministerial procedure including informational hearing and appeal processes for certain types of project requests.

More information on the programs that comprise the CHIP Ordinance can be found below.

State Density Bonus Program

The Department of City Planning proposes critical amendments to the Density Bonus ordinance in LAMC Section 12.22 A.25 (Section 9.2.1 in Article 9 in Chapter 1A) which serves as the City's primary mechanism for implementing State Density Bonus Law. Revisions include administrative and procedural updates to improve clarity and affirm consistency with State law. The State Density Bonus Program would apply citywide, however procedural exceptions, incentive limitations, and eligibility criteria may apply for properties in VHFHSZs, sites hosting designated historic resources, and sites hosting active or previously active hazardous uses.

Key revisions proposed as part of the State Density Bonus Program include:

- Revising and establishing definitions in alignment with State law
- Updating maximum density bonus tiers in alignment with State Density Bonus Law to allow for up to 50 percent density bonuses by-right
- Revising the number of incentives a project is eligible for based on the percentage of affordable housing provided in alignment with State Density Bonus Law
- Creating allowance for ministerial approval of additional density bonuses (up to 100 percent) in exchange for additional units restricted to Very Low Income households or Moderate Income households (pursuant to AB 1287 referred to in *Section 1.5, Changes to Circumstances*)
- Refining and expanding the pre-vetted menu of development incentives for eligible projects
- Establishing a new Public Benefit Options section that would provide projects with greater development bonuses in exchange for community benefits, except for projects on sites in Very High Fire Hazard Severity Zones and areas vulnerable to sea level rise only eligible for incentives under State Density Bonus Law.
- Streamlined procedures under certain circumstances to allow for expanded by-right processing for eligible projects without public hearings or appeals
- Requiring compliance with Environmental Protection Measures pertaining to sites hosting or near current or previously hazardous uses.
- Incorporating density bonus incentives for housing for target populations including Low Income Students, Transitional Foster Youth, Veterans, and individuals experiencing homelessness in alignment with State law.

Mixed Income Incentive Program

The Mixed Income Incentive Program encompasses several incentive strategies refined as part of the overall development of the Proposed Project. The strategies detailed in this program include both citywide incentives near transit as well as incentives that would be available only in Higher Opportunity Areas. Generally, environmentally sensitive areas including areas vulnerable to sea level rise, sites in the Coastal Zone, and properties in VHFHSZs would be ineligible for the Mixed Income Incentive Program except under limited circumstances as discussed in *Section 2.4, Project Modifications*. Additionally, projects proposing the demolition of designated historic resources would be ineligible for incentives described in this program. Projects proposed on sites with designated historic resources would be subject to additional review by City Planning staff. This program would advance multiple key strategies of the Proposed Project and would also promote opportunities for developments to include a wider mix of affordable income level units. In particular, affordability requirements may differ depending on geographic market areas, as well as a market-based value capture system informed by economic modeling, to ensure that the highest level of affordability is provided.

Key code amendments proposed as part of the Mixed Income Incentive Program include:

- Density bonuses ranging from 90 percent to unlimited citywide depending on proximity to Major Transit Stops
- Unlimited density on major corridors in Higher Opportunity Areas
- Greater FAR and height bonuses within a half mile of Major Transit Stops in Higher Opportunity Areas
- Expanded base incentives, including height and FAR, depending on site eligibility
- Affordability requirements that vary depending on market area
- Revising and establishing definitions
- Refining and expanding the pre-vetted menu of development incentives for eligible projects
- Establishing new Public Benefit Options section that would provide projects with greater development bonuses in exchange for community benefits including publicly accessible open space, tree preservation, and provision of active ground floor uses
- Requiring compliance with Environmental Protection Measures pertaining to sites hosting or near current or previously hazardous uses.
- Streamlined procedures, to allow for expanded by-right processing for eligible projects without public hearings or appeals

Transit Oriented Incentive Areas

A key element of the proposed Mixed Income Incentive Program is to build upon the successes of one of the City's existing incentive-based housing development programs known as the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines). In particular, the Mixed Income Incentive Program ordinance would codify and refine the transit proximity incentives, established by the TOC Guidelines, for multi-family housing. The Mixed Income Incentive Program proposes to codify these transit proximity incentives as Transit Oriented Incentive Areas.

Key amendments proposed as part of the proposal of Transit Oriented Incentive Areas include:

- Revising and establishing definitions
- Revising maximum density bonuses (90 percent to Unlimited)
- Revise maximum FAR bonuses
- Removal of minimum parking requirements for projects eligible for transit oriented incentives
- Updating procedures so that projects requesting incentives from a pre-vetted menu are guaranteed ministerial review without a public hearing or appeal
- Updating procedures to allow for off-menu incentive and waiver requests
- Revising the pre-vetted menu of incentives to incorporate new incentives and clarify existing incentives
- Revising the pre-vetted menu of incentives to incorporate new incentives and clarify existing incentives

Opportunity Corridor Incentive Areas

The Opportunity Corridors strategy aims to create housing capacity along major streets located in Higher Opportunity Areas through an incentive-based approach. This entails the creation of a geographically targeted affordable housing incentive system for existing commercial and residential zoned lots located along key corridors in Higher Opportunity Areas, with a tiered

structure that provides varying incentives, including unlimited density, based on proximity to transit and frequency of transit service.

The Opportunity Corridors strategy includes targeted incentives to allow for higher intensity multi-family residential development on residential and commercial zoned parcels that front corridors in Higher Opportunity Areas when affordable housing units are provided. The Opportunity Corridors strategy allows for proposed developments to take advantage of incentives that would allow for building envelopes that reflect the varying densities and site conditions in place on these corridors. The strategy would also plan around mobility options including corridor/network designations in the City's 2035 Mobility Plan. Housing scales facilitated through this strategy would range from lower rise typologies to high rise apartment buildings, with varied building scale incentives offered dependent on the corridor's existing zoning limitations, proximity to transit, and frequency of service.

In particular, the Opportunity Corridors program would facilitate development bonuses on all Avenues and Boulevards in Higher Opportunity Areas. Unlimited density would be offered for all thoroughfares designated as Opportunity Corridors and FAR and height incentive would be scaled depending on proximity to transit and underlying zoning with the largest FAR bonus (4.5:1) offered for corridors within a half mile of a Metro Rail Station or Portal and Rapid Bust Stop and on zones that have base densities of greater than five units.

In addition to the distinct incentive structure described above, key code amendments proposed as part of the Opportunity Corridors Strategy include:

- Unlimited density along major corridors
- Provision of FAR and Height bonuses as base incentives
- Elimination of parking requirements for projects that meet site eligibility criteria

"Missing Middle" Opportunity Corridor Transition Areas

The Proposed Project's Mixed Income Incentive Program also includes a "missing middle" strategy referred to as Opportunity Corridor Transition Areas. These incentive areas are intended to promote opportunities to facilitate the construction of various types of "low scale/low rise" housing (4 to 16 units) to fill the gap in housing options that exists between single-family homes and mid-rise apartment buildings. This strategy also aims to help create better physical transitions in building scale and density from development created as a result of the Opportunity Corridor strategies (described above) to lower scale neighborhoods by offering incentives within 750 feet of an Opportunity Corridor incentive area.

Key code amendments proposed as part of the Opportunity Corridor Transition Area Strategy include:

- Increased density for residentially zoned sites that are directly adjacent to designated opportunity corridors)
- Tailored menu of incentives, performance standards and inability to access waivers or modifications of development standards in order to ensure appropriate scale and quality of design. Automatic base incentives including height, increases contingent on the number of units provided, reduction in required setbacks and minimum lot area
- Elimination of parking requirements

Affordable Housing Incentive Program

The Affordable Housing Incentive Program would provide tailored land use incentives for One Hundred Percent Affordable Housing Projects and affordable housing projects constructed by

Faith Based Organizations in Moderate, High and Highest Resource areas of the City, as defined by TCAC. Additionally, the ordinance would expand the types of zones eligible for One Hundred Percent Affordable Housing Projects or projects constructed by Faith Based Organizations to “P” Parking zones and “PF” Public Facilities zones. Please note that the Affordable Housing Incentive Program is separate from the City’s existing affordable housing incentive programs aimed at creating more mixed-income housing developments.

The Affordable Housing Incentive Program is expected to apply unique sets of incentives for commercially or residentially zoned sites. The program would reflect existing State density bonus incentives available to One Hundred Percent Affordable Housing Projects;² However, the incentives in lower density residential areas would be designed with neighborhood context and scale in mind. Furthermore, the incentives would include limitations pertaining to environmentally sensitive, historic, and socially significant areas of the City. On “PF” Public Facilities zones, per direction from the Los Angeles City Council, One Hundred Percent Affordable Housing Projects would be allowed by-right without limitations on density, FAR, or height. Eligible Historic Resources would be reviewed by the Office of Historic Resources through an administrative review process to ensure that character-defining features are not compromised and that the conversion process conforms to the Secretary of the Interior’s Standards for Rehabilitation.

Key code amendments proposed as part of the Affordable Housing Incentive Program include:

- Unlimited density for One Hundred Percent Affordable Housing Projects or projects constructed by Faith Based Organizations near transit or within Higher or Moderate Opportunity areas
- Codification of density, height, and parking reduction incentives permitted for One Hundred Percent Affordable Housing Projects under State Density Bonus Law (California Government Code Sections 65915-65918)
- Expanded base incentives, including height and FAR, except for sites in Very High Fire Hazard Severity Zones and areas vulnerable to sea level rise only eligible for incentives under State Density Bonus Law
- Revising and establishing definitions
- Allowance of One Hundred Percent Affordable Housing Projects in “P” zones
- New incentives, including unlimited density, for Public Land projects (projects on land owned by a Public Agency or zoned “PF”) and Shared Equity Projects (projects on land owned by Community Land Trusts)
- Refining and expanding the pre-vetted menu of development incentives for eligible projects
- Establishing a new Public Benefit Options section that would provide projects with greater development bonuses in exchange for community benefits, except for sites in Very High Fire Hazard Severity Zones and areas vulnerable to sea level rise only eligible for incentives under State Density Bonus Law
- Streamlined procedures, to allow for expanded by-right processing for eligible projects without public hearings or appeals
- Requiring compliance with Environmental Protection Measures pertaining to sites hosting or near current or previously hazardous uses.
- Tailored procedures for projects constructed by Faith Based Organizations on sites with Eligible Historic Resources

² As provided by AB 1763 (California Government Code Section 65915).

- Acquisition and adjacency considerations for single-family parcels purchased by Faith Based Organizations after January 1, 2024

Citywide Adaptive Reuse Ordinance

The Proposed Project includes an update to the City's Adaptive Reuse Ordinance (ARO), first adopted in 1999 to apply to parts of downtown Los Angeles and modified in 2003 to expand adaptive reuse incentives to the Adaptive Reuse Incentives Area (ARIA) Specific Plan which included the areas of Chinatown, Lincoln Heights, Hollywood, Wilshire/Koreatown, and Central Avenue south of downtown Los Angeles. The Citywide update supersedes the Adaptive Reuse Incentive Areas, expanding general adaptive reuse incentives that will apply citywide, while retaining certain provisions unique to the ARIA subareas.³ The ARO update would alleviate additional barriers to streamline the conversion of underutilized office and commercial properties, including hotels, to housing through a by-right conversion process for buildings that are at least 15 years old. The ARO update could also potentially allow smaller unit sizes, reuse of more recently constructed buildings, and conversion of vacant ground floor commercial space, with certain exceptions.

The Citywide ARO would facilitate reuse of more buildings by updating eligibility criteria to apply to any building that is at least five years old, with buildings over fifteen years old eligible for ministerial review by Los Angeles Department of Building and Safety. The current program relies on a fixed date of July 1, 1974, to determine Adaptive Reuse Project eligibility. The purpose of this change in building age is to expand the pool of buildings eligible for a ministerial approval process to allow for residential conversions. Eligible Historic Resources would be reviewed by the Office of Historic Resources through an administrative review process to ensure that character-defining features are not compromised and that the conversion process conforms to the Secretary of the Interior's Standards for Rehabilitation. Buildings of between five and fifteen years of age would remain eligible for the adaptive reuse incentives but would still be required to obtain a discretionary Zoning Administrator approval.

The proposed Citywide ARO will supersede the Adaptive Reuse Incentive Area Specific Plan so that the same Citywide ARO provisions are applicable citywide. Special provisions associated with the Specific Plan boundaries, including allowing conversions of commercial properties to hotels and conversion to residential uses in manufacturing zones, will be maintained for the Specific Plan areas and are not proposed to apply citywide.

Key code amendments proposed as part of the Citywide ARO include:

- Revising and establishing definitions
- Updating eligibility criteria for buildings proposing conversions to residential uses
- Establishing streamlined procedures, including no hearing and no appeals, for projects proposing the conversion of a non-residential use into a residential use
- Additional review for adaptive reuse conversion projects on sites containing Eligible Historic Resources
- Revised and enhanced menu of incentives for projects proposing conversion of non-residential buildings to residential uses
- Tailored Unified Adaptive Reuse incentives for Adaptive Reuse Projects providing affordable housing with new construction
- Alignment with provisions set forth in AB 1490 (2023)

³ Notably, the Citywide ARO would not apply in the Downtown Los Angeles Community Plan area as that community plan area would be subject to a separate set of development regulations.

- Amendments to both Chapters 1 and 1A of the LAMC to align provisions described above

Housing Element Sites and Minimum Density Ordinance

The Proposed Project would also include an ordinance to implement various housing element law requirements that apply to several different categories of sites identified in the City's 2021-2029 Housing Element. The requirements pertain to housing replacement, by-right development review for 20 percent affordable developments, no net loss, and minimum density requirements. Specifically, they apply to properties identified in the Housing Element Inventory of Sites (currently Appendix 4.1, 4.2, and 4.3 of the 2021-2029 Housing Element); sites that have been listed in Prior Housing Element Site Inventories; and rezoning sites identified to meet the lower income portion of the remaining RHNA.

The housing replacement requirements apply to sites listed in the current Housing Element Inventory of Sites. These requirements prevent the City from approving any development project on a Housing Element site that includes (or included within the last 5 years) certain protected units (e.g., those subject to the Rent Stabilization Ordinance or occupied by lower-income tenants) unless it complies with the replacement provisions defined in California Government Code Section 65915(c)(3). These provisions often mandate that the new development must provide replacement units to ensure there is no net loss of affordable housing. The ordinance also requires separate no net loss findings, which would not have an impact on the environment, but which are designed to ensure an adequate inventory of sites.

The replacement requirement substantially mirrors existing State law requirements in the Housing Crisis Act (Section 66330 of the Government Code), as well as the requirements in today's Density Bonus program and TOC Guidelines. It should be noted that these requirements have become entirely duplicative since AB 1218 (2023) took effect on January 1, 2024. Furthermore, the accompanying Resident Protections Ordinance (see below) extends replacement requirements beyond 2030. Due to the significant overlap between existing and proposed laws, the impact of this aspect of the ordinance is anticipated to be relatively minor.

A more substantial aspect of this ordinance includes the State law requirements [Government Code Section 65583.2(h) and (i)] to permit owner-occupied and rental multi-family uses "by right" for developments in which 20 percent or more of the units are affordable to lower income households. By-right means local governmental review must not require a discretionary review or approval for projects that otherwise meet objective zoning standards. The only exception is for new subdivisions of land. A residential use that meets the criteria shall not constitute a "project" for CEQA purposes.

State housing element law requires by-right development review for eligible development projects on the following site categories. The first are those identified in Prior Housing Element Site Inventories in either the prior two housing element planning periods (or three if the site is vacant). In addition, by-right development review is applied to rezoning sites that are identified to meet the lower income portion of the RHNA. These Lower Income Rezoning Sites must also be zoned with development standards that permit at least 16 units per site and require a minimum density of at least 20 units per acre in metropolitan areas like Los Angeles.

The minimum density requirement also applies to sites across the city where multi-family residential uses are permitted. A minimum density requirement of at least one dwelling unit for every 2,000 square feet of lot area will apply to residential or mixed-use developments on nearly all sites in the R3, RAS3, R4, RAS4, R5, CR, C1, C1.5, C2, C4, C5, CM zones. This requirement will only apply to RD1.5 and RD2 Zoned sites in High or Medium High Residential Market Areas, as defined in the Affordable Housing Linkage Fee. Applying minimum density requirements aligns

with the 2021-2029 Housing Element to promote new multi-family housing development in Higher Opportunity Areas.

Resident Protections Ordinance

The Proposed Project would also include an ordinance that would strengthen and expand existing regulations related to tenant protections and affordable housing units. These regulations would be generally applicable to any housing development project within the City, including those that do not utilize affordable housing incentives. In alignment with the Housing Crisis Act, they would also apply to non-housing development projects submitted until 2030.

Regarding tenant protections, the ordinance would codify requirements pertaining to the demolition of existing housing. This would include the following key components:

- Codification of State housing replacement requirements and occupant protections that were created through the Housing Crisis Act, to extend applicability beyond the 2030 sunset date in State law and incorporate recent amendments by AB 1218 (2023);
- Strengthen occupant protections guaranteed by state law, including:
 - Guarantee the right to return at the prior rental rate, and to a comparable unit (meaning same number of bedrooms and bathrooms)
 - Establish a local formula to implement the state framework for expanded relocation assistance for lower income residents
 - Codify tenant notification requirements regarding all rights, but particularly right to return
 - Create a citywide Anti-Harassment Violators Database to identify and penalize developers who are found to have committed unlawful tenant harassment or illegally evicted a tenant pursuant to the City's existing Anti-Tenant Harassment Ordinance.
 - Establish a private right of action for tenants to seek legal remedies against developers who violate their rights pursuant to the ordinance
- Expand and clarify replacement requirements, including:
 - Increase housing replacement requirements for units subject to the RSO, to ensure one-for-one replacement of any demolished RSO housing units
 - Replace Acutely Low and Extremely Low Income units when incomes of tenants are known; and

The ordinance would also codify requirements for any project within the City that includes restricted affordable housing units, including the following key components:

- Extend required terms of affordable housing covenants to 99 years, with some limited exceptions;
- Codify State requirements pertaining to equal access to amenities and standards for distribution of affordable housing units within a mixed income building, as these standards are not currently codified within the LAMC; and
- Codify policies around the allocation of restricted affordable units, including affirmative marketing and fair housing outreach policies and the listing of affordable units on the Affordable and Accessible Housing Registry with a goal to prioritize those most in need.

Environmental Protection Measures

The CHIP Ordinance would add Section 11.5.15 to the LAMC to allow the Director of Planning to adopt environmental protection measures. Similar language is included in Chapter 1A of the

LAMC and proposed to be adopted with the Downtown Community Plan Update. Adding the language to Chapter 1, would allow the Director to also adopt measures for housing development projects throughout the City, not just in the Downtown Community Plan area. This would allow the Director to add an environmental protection measure to address community concerns with review of technical studies and remediation plans related to contamination in and around active oil wells as well as sites on or near lots with previously hazardous uses including gas stations and dry cleaners. Additionally, adoption of the current proposed environmental protection measures to implement the mitigation measures adopted with the 2021-2029 Housing Element would improve the administration and enforcement of the mitigation as the proposed environmental protection measures and implementing regulations provide a comprehensive administrative and enforcement scheme for the regulation of mitigation measures that are equal or more effective than the mitigation measures adopted in the Housing Element EIR Mitigation Monitoring Program (MMP), which is included as Appendix A to this Addendum.

2.4 PROJECT MODIFICATIONS

Below is a summary of modifications associated with the Proposed Project to the project scope analyzed by the Housing Element EIR.

Housing Development Adjacent to Very High Fire Hazard Severity Zones

As stated in *Section 2 Project Description*, properties located in VHFHSZs or areas vulnerable to sea level rise would generally not be eligible for incentives available in the proposed CHIP Ordinance. However, properties using the Mixed Income Incentive Program in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ may still be eligible. The Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program that would enable this construction in these very targeted areas. For this reason, this policy direction currently incorporated into the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR.

This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood.

State Legislation (2022 and 2023)

As described in Chapter 1, the California State Legislature enacted a range of new bills focused on housing development in 2022 and 2023 that were not considered as part of the environmental analysis conducted for the 2021-2029 Housing Element. A thorough review of these bills reveals that the provisions implemented as a result of their passage would not result in environmental impacts that exceed those contemplated in the Housing Element EIR. More information on this is provided in *Section 1.5, Changes to Circumstances*.

Environmental Protection Measures

The Proposed Project would authorize the Director to adopt environmental protection measures under Chapter 1 of the LAMC. This would allow the proposed implementing regulations, including extensive noticing, and the proposed environmental protection measures for construction impacts to air, noise, biological resources, archeology, including measures for the Zanja Madre, tribal cultural resources, paleontological resources, noise and vibration to provide alternative mitigations to the mitigation measures for Mitigation Measures 4.3-1(b), 4.4-2, 4.5-1(a)-(d), 4.7-2(a)(b), and 4.15-1(a)(b), and to make minor clean up changes to Mitigation Measures, including

4.2-2(a) and (b), 4.8-1, and 4.10.2 to clarify expert study requirements for drainage, and reconcile the mitigation measures with new state law related to residential operational noise, and to clarify that air study needs to provide all feasible mitigation and recognize the EIR and adopted EIR findings found all feasible air mitigation measures may not reduce impacts to less than significant. The proposed environmental protection measures and their implementing regulations and ordinance are stricter than the adopted mitigation measures because they make a violation of an environmental protection measure a violation of the code subject to criminal, civil and administrative enforcement. The regulations also require all applicants to include the measures on plans, and the owner and contractors to sign an acknowledgement of the standards. It also requires owners to maintain all records of compliance for at least five years after occupancy and allow City inspection of compliance records and allow the Director to require construction monitors. The project also proposed to include the Director adopting an environmental standard for Housing Element Rezoning Sites in and around active oil sites. Based on the above, it is found that the proposed environmental protection measures are equal or more effective than the mitigation measures they will replace in the MMP adopted with the Housing Element EIR (Appendix A) and will not result in new or more severe significant impacts than those identified in the Housing Element EIR. As such, no further analysis will be required in this Addendum.

3 ENVIRONMENTAL IMPACT ANALYSIS

This section of the Addendum provides an impact analysis under *CEQA Guidelines* Section 15162(a)(1) to assess whether the changes to the project scope analyzed in the Housing Element EIR (i.e., the 2021-2029 Housing Element) from the Proposed Project will result in new or more severe significant impacts when compared to those resulting from the 2021-2029 Housing Element, as analyzed in the Housing Element EIR. As summarized in *Section 2.4, Project Modifications* there are no changed circumstances that are anticipated to result in new or more severe significant impacts. The only changed circumstances identified since the adoption of the 2021-2029 Housing Element were the new State housing bills discussed above and as summarized in *Section 1.5, Changes to Circumstances*. These laws are not anticipated to change the impacts caused by the 2021-2029 Housing Element analyzed in the Housing Element EIR. Additionally, as discussed above, the only change or modification to the 2021-2029 Housing Element identified is the proposal to adopt policies to allow some of the new development incentives in VHFHSZs. As such, that is the “change to the project” and the focus of the following environmental analysis.

The Proposed Project, including specifically, the changes to the Housing Element Project from the Proposed Project related to VHFHSZs, would not add new housing citywide, rather it would redistribute previous housing assumptions within the same transportation analysis zones (TAZs) that were used in the Housing Element EIR analysis. This conclusion is supported by the fact that nothing in the Proposed Project would change the forecasted population, housing, or employment numbers for the TAZ zones, based on results from the City of Los Angeles Travel Demand Forecasting model. Therefore, because the Proposed Project would not remove, alter, or otherwise redistribute the forecast development and population growth across TAZs, it is not foreseeable that the Proposed Project would result in any new or different environmental impacts to the impacts that rely on density forecasts, including air quality, greenhouse gas emissions, utilities and service systems, land use, population and housing, and recreation. Additionally, as the Housing Element EIR forecasted redevelopment of sites in the areas affected by the changes from the Proposed Project, the impact analysis related to ground disturbing activity and demolition and construction would foreseeably remain unchanged. Specifically, these impacts include those related to archaeological resources, historical resources, paleontological resources, geology and soils, hydrology and water quality, hazards and hazardous materials and tribal cultural resources. As such, the following environmental impacts would not foreseeably change based on the modification to the 2021-2029 Housing Element from implementation the Proposed Project, and therefore are not analyzed further in the impact assessment of this Addendum: Aesthetics, Air Quality, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, and Utilities and Service Systems.

The analysis in this section of the Addendum, therefore, focuses on impacts that would potentially be impacted by development that may occur in VHFHSZ, including those related to Biological Resources due to development that would be adjacent to undisturbed hillsides under the Proposed Project (*Section 3.1, Biological Resources*, of the Addendum), and Wildfire due to the inclusion of the opportunity corridor parcels in VHFHSZs that may be eligible for incentives under the Proposed Project (*Section 3.3, Wildfire*, of the Addendum). In addition, for a direct comparison of the Proposed Project’s transportation impacts to those analyzed under the Housing Element EIR, *Section 3.2, Transportation*, of the Addendum summarizes the findings of the Transportation Impacts Memorandum (Appendix B) prepared by Fehr & Peers on June 20, 2024.

The conclusions of the previously adopted Housing Element EIR are provided as a reference to further describe how the Proposed Project would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the Housing Element EIR for Biological Resources, Transportation, and Wildfire. The analysis in this section addresses whether any of the conditions set forth in PRC Section 21166 and *CEQA Guidelines* Section 15162, requiring preparation of a supplemental or subsequent EIR, have been triggered. Specifically, this section and associated evaluations provide the following information for all analyzed impacts:

- A. Impact Determination in the Housing Element EIR.** This section summarizes the impact determination made in the Housing Element EIR for each impact category.
- B. Are Substantial Changes Proposed in the Proposed Project Which Will Require Major Revisions of the Housing Element EIR, Due to New Significant Impacts or Substantially More Severe Impacts?** Pursuant to *CEQA Guidelines* Section 15162(a)(1), this section indicates whether the Proposed Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.
- C. Any Change in Circumstances Regarding the Proposed Project Which Will Require Major Revisions of the Housing Element EIR, Due to New Significant Impacts or Substantially More Severe Impacts?** Pursuant to *CEQA Guidelines* Section 15162(a)(2), this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.
- D. Any Information of Substantial Importance, Not Known and Could Not Have Been Known with the Exercise of Reasonable Diligence at the time the Housing Element EIR was Certified and Was Approved?** Pursuant to *CEQA Guidelines* Section 15162(a)(3)(A-D), this section indicates whether 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 environmental documents were certified as complete shows that: (A) The project will have one or more significant effects not discussed in the prior environmental documents; (B) Significant effects previously examined will be substantially more severe than shown in the prior environmental documents; (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; or (D) Mitigation measures or alternatives which are considerably different from those analyze in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. New studies completed as part of this environmental review are attached to this Addendum or are on file with the Planning Department.
- E. Conclusion.** For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

3.1 BIOLOGICAL RESOURCES

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Significant and Unavoidable	No	No	No

A. Impact Determination in the Housing Element EIR

Urbanization has substantially reduced the abundance and diversity of biological resources in Los Angeles, particularly in the central and southern portions of the City. Nonetheless, habitat types that remain in the City are limited, but diverse. These habitats include but are not limited to chaparral and coastal scrub covered hillsides, valley grasslands, and riparian areas that support oak, sycamore, and walnut woodlands. Special-status species have the potential to occur throughout these natural areas.

Because housing development carried out under the Housing Element Update has the potential to occur in these natural areas, vegetation clearing and excavation could remove habitats or individuals. Excavation, ground clearing, equipment and materials storage, access routes, and other activities could result in impacts on runoff and/or water quality, potentially affecting habitats. Moreover, excavation, ground clearing, and access routes could result in air quality impacts (dust, exhaust) or generate noise that could affect adjacent individuals. Equipment or construction-related traffic could introduce hazardous materials into habitats as well. Equipment and construction personnel could also introduce harmful, noxious, and/or invasive species that could damage habitats (such as by tracking in weed seeds). Any of these direct and indirect effects could result in significant impacts on special-status species. Even in fully developed areas, housing development activities have the potential to result in impacts on protected species. If housing is sited within or adjacent to natural habitats, then it could affect special-status species or their habitats, which would be considered a significant impact.

Notably, migratory birds, including most birds that nest in the areas subject to housing development under the Housing Element Update, are protected by the federal Migratory Bird Treaty Act (MBTA), which forbids most forms of harm to birds, including to their active nests. In addition, California Fish and Game Code (CFGF) Section 3503 makes it unlawful to destroy nests or eggs of any bird, except as otherwise provided by code or regulation. Where vegetation, and especially trees, are removed as part of housing development under any of the various housing types, there is the potential for violations under the MBTA and Section 3503 of the CFGF, which are considered significant. Compliance with existing laws and regulations (e.g., MBTA and CFGF), would reduce potential impacts.

Conclusion: Impacts from build out of the RHNA would depend most on the location of the housing development project whether it is occurring near habitats that could support or is used by special status species. The size and scope of the project can also affect the level of impact, but even the construction of a single-family home or ADU can have the potential to impact sensitive species,

depending on the location of the project. As such, impacts to special-status species from build out of the RHNA under the Housing Element Update are *potentially significant*.

Mitigation Measures:

4.3-1(a) Biological Resources reconnaissance Survey and Reporting

For all discretionary projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes of on natural (e.g., native, virgin) or disturbed (e.g., unpaved, areas barren, or ruderal), areas that contain or have the potential to support special-status species, sensitive habitat, or within 300 feet of suitable habitat to support special-status species (e.g., nesting passerines) as determined by the Department of City Planning and/or CDFW, the project applicant shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of the Proposed Project on wildlife corridors. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate.

If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to the Department of City Planning (DCP) prior to issuance of a grading permit, and the project may proceed without any further biological investigation. If wildlife corridors are present, the report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.

4.3-1(b) Pre-Construction Bird Nest Surveys, Avoidance, and Notification

For all discretionary projects where sensitive species and/or habitat are identified in the biological resources assessment prepared pursuant to MM 4.3-1(a), the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and California Department of Fish and Wildlife (CDFW) prior to ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall also be submitted to DCP and CDFW following construction.

Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective measures conducted shall be prepared by a qualified biologist and shall be submitted to the City within two weeks of project completion.

Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

4.3-1(c) Focused Surveys for Rare Plants

If indicated as appropriate by the biological resources assessment report required in Mitigation Measure 4.3-1(a), focused surveys for special status plants shall be conducted. Prior to vegetation clearing for construction in open space areas, special status plants identified in the focused surveys shall be counted and mapped and a special-status plant relocation plan shall be developed and implemented to provide for translocation of the plants. The plan shall be prepared by a qualified biologist and shall include the following components: (1) identify an area of appropriate habitat, on-site preferred; (2) depending on the species detected, determine if translocation will take the form of seed collection and deposition, or transplanting the plants and surrounding soil as appropriate; (3) develop protocols for irrigation and maintenance of the translocated plants where appropriate; (4) set forth performance criteria (e.g., establishment of quantitative goals, expressed in percent cover or number of individuals, comparing the restored and impacted population) and remedial measures for the translocation effort; and (5) establish a five-year monitoring procedures/protocols for the translocated plants. Five years after initiation of the restoration activities, a report shall be submitted to DCP and CDFW, which shall at a minimum discuss the implementation, monitoring, and management of the restoration activities over the five-year period and indicate whether the restoration activities have, in part or in whole, been successful based on the established performance criteria. The restoration activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP, CDFW, and U.S. Fish and Wildlife Service (USFWS), when applicable.

4.3-1(d) Adaptive Management Plan

If indicated as appropriate in a reconnaissance, pre-construction or focused survey required in Mitigation Measure 4.3-1(a), (b), or (c) the biologist shall prepare an Adaptive Management

Plan for future operations to ensure that operations will not result in impacts to special status species, such as lighting plans, fencing plans, revegetation plans, and/or necessary covenants to ensure property owners maintain their properties in a way to reduce impacts to native species, such as requirements for keeping domestic animals or use of non-native vegetation, and/or education campaigns. Applicants shall prepare necessary documentation and provide adequate assurances to ensure compliance with ongoing operational requirements, including such measures as, but not limited to, filing of covenants, creation of funding mechanism, or provision of bonds.

Level of Significance of Impact after Mitigation: Mitigation Measure 4.3-1(a) through 4.3-1(d) requires the completion of a biological resources assessment reports for any projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes on natural (e.g., native, virgin) or disturbed (e.g., unpaved, barren, or ruderal), areas that contain or have the potential to support special-status species, sensitive habitat, or are within 300 feet of suitable habitat to support special-status species. If sensitive species and/or habitat are identified, pre-construction surveys will be conducted, and other protective measures will be implemented as needed during the pre-construction and construction monitoring phases. In addition, the measure requires focused surveys for special-status plants if the biological resources assessment report deems it appropriate to conduct such a survey. Additionally, mitigation plans to address operational impacts may also be required.

Implementing these conditions for projects would reduce the potential for substantial adverse effect on species identified as a candidate, sensitive, or special species in local or regional plans, policies, or regulations, or by the CDFW or United States Fish and Wildlife Service (USFWS), on most development sites. However, as Mitigation Measure 4.3-1(a)-(d) would not apply to ministerial projects, the mitigation measures would not eliminate all potential impacts to special-status species from implementation of the Housing Element Update. Applying the measure to ministerial projects is infeasible based on the necessary resources to implement and administer the measure and the burden to needed housing. Additionally, without knowing all site-specific conditions and depending on circumstances, even applying mitigation measures, impacts may still occur. Therefore, impacts related to the Housing Element Update are *significant and unavoidable*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in *Section 2, Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however, it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, the policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

With respect to candidate, sensitive, or special status species, the Housing Element EIR acknowledges that urbanization has substantially reduced the abundance and diversity of biological resources in the city and impacts from build out of the RHNA would depend most on the location of the housing development and whether it is occurring within or near natural habitat

that could support or is used by these species. Specifically, the Housing Element EIR anticipates that housing growth would occur in areas already developed with residential uses or areas with potential for residential redevelopment, including but not limited to the following:

- Sites currently zoned for residential uses, including multi-family and single-family uses;
- Sites currently zoned for commercial uses, which permit residential uses;
- Sites currently zoned for hybrid industrial uses, which permit joint live-work residential uses;
- Non-vacant sites, and sites with existing housing units;
- Sites located near public transportation;
- Sites located in a Historic Preservation Overlay Zone; and
- Sites located in areas with special environmental considerations, such as areas located near Open Space, Hillside Areas, VHFHSZ, or the Coastal Zone.

Note, the EIR recognized and included case studies that analyzed housing on sites that are in hillsides and VHFHSZ and in non-residential zones, such as industrial zones, recognizing that build out of the RHNA could occur anywhere in the City.

Although the 1,100 parcels are on the periphery of the city's hillsides, these parcels would occur in geographic areas that are similar to those identified in the areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element), and in Higher Opportunity Areas (High and Highest Resource Areas as defined by TCAC). Nonetheless, and as discussed in the Housing Element EIR, any housing sited within or adjacent to natural habitat could affect candidate, sensitive, or special status species, which would result in a significant impact. However, similar to housing development analyzed under the Housing Element EIR, implementation of Mitigation Measure 4.3-1(a) through 4.3-1(d) would require the completion of a biological resources assessment reports for any projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes on natural or disturbed, areas that contain or have the potential to support special-status species, sensitive habitat, or are within 300 feet of suitable habitat to support special-status species. These measures would reduce impacts to biological resources on most developed sites. However, as Mitigation Measures 4.3-1(a) through (d) would not apply to ministerial projects, the mitigation measures would still not eliminate all potential impacts to special-status species from implementation of the Proposed Project. Additionally, as stated in the Housing Element EIR, without knowing all site-specific conditions and depending on circumstances, even applying mitigation measures, impacts may still occur. Therefore, this impact would remain significant and unavoidable.

There are no proposed changes under the Proposed Project that would require major revisions to the Housing Element EIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or

more severe significant impacts related to candidate, sensitive, or special status species beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to candidate, sensitive, or special status species beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Section 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Significant and Unavoidable	No	No	No

A. Impact Determination in the Housing Element EIR

Housing development accommodated under the Housing Element Update that is within or adjacent to sensitive habitats, such as riparian, oak woodlands, or stands of protected trees (e.g., walnuts, oaks, sycamore), could result in potential direct and impacts through removal of vegetation, compaction of soils, and/or indirectly through dust and vegetation thinning. Through zoning restrictions, housing development under the Housing Element Update would be consistent with the objectives, policies, and programs contained within the City's General Plan Conservation Element to protect sensitive species, which would have direct and indirect beneficial effects for special status species, such as through preserving, protecting, restoring, and enhancing natural plant and wildlife diversity, habitats, corridors, and linkages to enable the health propagation and survival of native species.

Conclusion: The Housing Element Update would not change the objectives, policies, and programs contained within the City's General Plan Conservation Element. However, it is reasonably foreseeable that implementation of the Housing Element Update could impact various habitat types, including riparian habitat and other sensitive plant communities. Therefore, impacts related to riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the CDFW or USFWS are *potentially significant*.

Mitigation Measures:

4.3-2(a) Habitat Mitigation and Monitoring Program

For discretionary projects that are in areas potentially containing sensitive natural communities or jurisdictional waters and riparian habitat, including streams, wetlands, riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project, prior to the issuance of grading permits, the applicant shall prepare and submit a Habitat Mitigation and Monitoring Program (HMMP), which shall mitigate for impacts to CDFW jurisdictional habitat at a 2:1 ratio for permanent impacts and a 1:1 ratio for temporary impacts, or as otherwise approved by CDFW and the City.

The HMMP shall mitigate for impacts to jurisdictional areas via an acceptable mitigation approach that involves one or a combination of the on-site or off-site restoration or enhancement of degraded in-kind habitats, preservation of in-kind habitats, or by a contribution to an in-lieu fee program approved by the City, CDFW (and USACE, RWQCB, if applicable).

The final HMMP shall be developed by a qualified biologist, restoration ecologist or resource specialist and submitted to and approved by the City and CDFW (USACE, RWQCB, if applicable), in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code 1602 and supporting regulations, prior to issuance of a grading permit for the project. In broad terms, this Program shall at a minimum include:

- Description of the project/impact and mitigation sites;
- Specific objectives;
- Success criteria;
- Plant palette;
- Implementation plan;
- Maintenance activities;
- Monitoring plan; and
- Contingency measures.

Success criteria shall at a minimum be evaluated based on appropriate survival rates and percent cover of planted native species, as well as eradication and control of invasive species within the restoration area.

The target species and native plant palette, as well as the specific methods for evaluating whether the project has been successful at meeting the above-mentioned success criteria shall be determined by the qualified biologist, restoration ecologist, or resource specialist and included in the HMMP.

The HMMP shall be implemented over a five-year period and shall incorporate an iterative process of annual monitoring and evaluation of progress and allow for adjustments to the program, as necessary, to achieve desired outcomes and meet success criteria. Annual reports discussing the implementation, monitoring, and management of the HMMP shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable). Five years after project start, a final report shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable), which shall at a minimum discuss the implementation, monitoring and management of the mitigation project over the five-year period and indicate whether the HMMP has met the established success criteria. The annual reports and the final report shall include as-built plans submitted as an appendix to the report. Restoration will be considered successful after the success criteria have been met for a period of at least two years without any maintenance or remediation activities other than invasive species control. The project shall be extended if the success criteria have not been met at the end of the five-year period to the satisfaction of the City and the CDFW (USACE, RWQCB, if applicable).

4.3-2(b) Protected Tree and Tree Canopy Survey

For discretionary projects that include the removal of trees, prior to the issuance of a grading permit, a tree report and tree replanting plan shall be conducted by a certified arborist prior to project construction to tag and assess all trees (defined as woody plant material that is five inches or greater in diameter at breast height [DBH – four and a half feet off grade]) subject to the City's Protected Tree Ordinance on the project site. Trees shall be tagged to correspond with a tree exhibit map. Also, the genus and species of the trees, size of the trees at DBH, and structure and vigor of the trees shall be determined, and an evaluation of the trees' resource value (i.e., the biological impacts of the tree removals, potential to be considered wildlife habitat, and locating trees deserving protection) shall be completed. All protected trees shall receive a visual tree assessment (VTA – meaning tree observations shall be from the ground and that no special devices [e.g., increment borers, drills] shall be used). Following

the completion of the tree survey, the arborist shall prepare a report that shall at a minimum provide a description of the general character of the trees on the site and identify opportunities and constraints for preservation. The report and tree replanting plan shall be provided to the City for review. As part of the assessment, a plot plan shall also be prepared indicating the location, type, and canopy coverage of all existing trees on the site and within the adjacent public right(s)-of-way.

Based on the results of the tree survey, development plans shall be clustered to maximum extent feasible in order to avoid impacts to sensitive natural communities (e.g., oak woodlands, riparian habitats, extensive tree canopy) and to maintain the largest and most contiguous area of sensitive communities on the site. Additionally, the development plans shall include a proposed minimum buffer to protect adjacent sensitive communities. Development plans that impact sensitive natural communities shall include a detailed feasibility analysis showing how the design has accomplished these avoidance strategies; the City shall not approve development plans until the site design has adequately demonstrated maximum avoidance of sensitive natural communities to the satisfaction of the City Planning.

Further, removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.

The following measures shall be implemented in addition to those required under the City's Protected Tree Ordinance (Ordinance No. 177,404) to avoid and/or compensate for potential indirect impacts to preserved sensitive natural communities before, during, and following construction activities.

Pre-Construction

- **Fencing:** Protective fencing at least three feet high with signs and flagging shall be erected around all preserved sensitive natural communities where adjacent to proposed vegetation clearing and grubbing, grading, or other construction activities. The protective fence shall be installed at a minimum of five feet beyond the tree canopy dripline. The intent of protection fencing is to prevent inadvertent limb/vegetation damage, root damage and/or compaction by construction equipment. The protective fencing shall be depicted on all construction plans and maps provided to contractors and labeled clearly to prohibit entry, and the placement of the fence in the field shall be approved by a qualified biologist prior to initiation of construction activities. The contractor shall maintain the fence to keep it upright, taut and aligned at all times. Fencing shall be removed only after all construction activities are completed.
- **Pre-Construction Meeting:** A pre-construction meeting shall be held between all site contractors and a registered consulting arborist and/or a qualified biologist. All site contractors and their employees shall provide written acknowledgement of their receiving sensitive natural community protection training. This training shall include, but shall not be limited to, the following information: (1) the location and marking of protected sensitive natural communities; (2) the necessity of preventing damage to these sensitive natural communities; and (3) a discussion of work practices that shall accomplish such.

During Construction

- **Fence Monitoring:** The protective fence shall be monitored regularly (at least weekly) during construction activities to ensure that the fencing remains intact and functional, and that no encroachment has occurred into the protected natural community; any repairs to the fence or encroachment correction shall be conducted immediately.

- **Equipment Operation and Storage:** Contractors shall avoid using heavy equipment around the sensitive natural communities. Operating heavy machinery around the root zones of trees would increase soil compaction, which decreases soil aeration and, subsequently, reduces water penetration into the soil. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected zones, unless where specifically approved in writing and under the supervision of a registered consulting arborist and/or a qualified biologist.
- **Materials Storage and Disposal:** Contractors shall not store or discard any construction materials within the fenced protected zones and shall remove all foreign debris within these areas. The contractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. Contractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (anti-freeze) shall be disposed of properly. The contractors shall ensure that equipment be parked at least 50 feet, and that equipment/vehicle refueling occur at least 100 feet, from fenced protected zones to avoid the possibility of leakage of equipment fluids into the soil.
- **Grade Changes:** Contractors shall ensure that grade changes, including adding fill, shall not be permitted within the fenced protected zone without special written authorization and under supervision by a registered consulting arborist and/or a qualified biologist. Lowering the grade within the fenced protected zones could necessitate cutting main support and feeder roots, thus jeopardizing the health and structural integrity of the tree(s). Adding soil, even temporarily, on top of the existing grade could compact the soil further, and decrease both water and air availability to the tree roots. Contractors shall ensure that grade changes made outside of the fenced protected zone shall not create conditions that allow water to pond.
- **Trenching:** Except where specifically approved in writing beforehand, all trenching shall be outside of the fenced protected zone. Roots primarily extend in a horizontal direction forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. A registered consulting arborist shall ensure that all pruning cuts shall be clean and sharp, to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may ultimately result in tree mortality. Use of both root pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary.
- **Erosion Control:** Appropriate erosion control best management practices (BMPs) shall be implemented to protect preserved sensitive natural communities during and following project construction. Erosion control materials shall be certified as weed free.
- **Inspection:** A registered consulting arborist shall inspect the preserved trees adjacent to grading and construction activity on a monthly basis for the duration of the grading and construction activities. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the registered consulting arborist following each inspection.

Post-construction

- **Mulch:** The contractors shall ensure that the natural duff layer under all trees adjacent to construction activities shall be maintained. This would stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The contractors shall ensure that the mulch be kept clear of the trunk base to avoid creating conditions favorable to the

establishment and growth of decay causing fungal pathogens. Should it be necessary to add organic mulch beneath retained oak trees, packaged or commercial oak leaf mulch shall not be used as it may contain root fungus. Also, the use of redwood chips shall be avoided as certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any added organic mulch added by the contractors shall be applied to a maximum depth of 4 inches where possible.

- **Watering Adjacent Plant Material:** All installed landscaping plants near the preserved sensitive natural communities shall require moderate to low levels of water. The surrounding plants shall be watered infrequently with deep soaks and allowed to dry out in-between, rather than frequent light irrigation. The soil shall not be allowed to become saturated or stay continually wet, nor should drainage allow ponding of water. Irrigation spray shall not hit the trunk of any tree. The contractors shall maintain a 30-inch dry-zone around all tree trunks. An above ground micro-spray irrigation system shall be used in lieu of typical underground pop-up sprays.
- **Monitoring:** A certified arborist shall inspect the trees preserved on the site adjacent to construction activities for a period of two years following the completion of construction. Monitoring visits shall be completed quarterly, totaling eight visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be submitted to the City. Additionally, any tree mortality shall be noted and any tree dying during the two-year monitoring period shall be replaced at a minimum 3:1 ratio on-site in coordination with the City.

Level of Significance of Impact after Mitigation: Mitigation Measures 4.3-2(a) and 4.3-2(b) require the completion of a HMMP and a protected tree and tree canopy survey for any projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes in riparian or other sensitive habitats, including urban tree canopies. Implementing these conditions for projects would reduce the potential for substantial adverse effect on these resources by avoiding, minimizing, and mitigating impacts through approval of site-specific mitigation plans or replanting plans prior to the issuance of a grading permit. However, as Mitigation Measures 4.3-2(a) and 4.3-2(b) would not apply to ministerial projects, the mitigation measures would not eliminate all potential impacts to sensitive habitats from implementation of the Housing Element Update. Imposing the mitigation measures on all ministerial projects is not feasible based on the resources required to adopt and implement the requirement and based on the burden on urgently needed housing. Additionally, even with mitigation depending on the circumstances impacts may still result. Therefore, the Housing Element Update would result in a *significant and unavoidable* impact after mitigation.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in *Section 2 Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however, it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, the policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's

hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

Although urbanization has substantially reduced the abundance and diversity of biological resources in the city, the Housing Element EIR acknowledges that housing development accommodated under the 2021-2029 Housing Element within or adjacent to sensitive habitats could result in potential direct indirect impacts through removal of vegetation, compaction of soils, and/or indirectly through dust and vegetation trimming. However, the Housing Element EIR also anticipates that housing growth would occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types).

The 1,100 parcels under the Proposed Project are on the periphery of the city's hillsides in geographic areas that are similar to those areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element), and in Higher Opportunity Areas. Nonetheless, as with housing development under the 2021-2029 Housing Element, it is reasonably foreseeable that implementation of the Proposed Project could impact various habitat types, including riparian habitat and other sensitive plant communities. Mitigation Measures 4.3-2(a) and 4.3-2(b) would require the completion of a HMMP and a protected tree and tree canopy survey for any projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes in riparian or other sensitive habitats, including urban tree canopies. However, as Mitigation Measures 4.3-2(a) and 4.3-2(b) would not apply to ministerial projects, the mitigation measures would not eliminate all potential impacts to sensitive habitats from implementation of the Proposed Project. This impact would remain significant and unavoidable.

There are no proposed changes under the Proposed Project that would require major revisions to the Housing Element EIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to riparian or other sensitive natural communities beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to riparian or other sensitive natural communities beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Section 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
(c) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Significant and Unavoidable	No	No	No

A. Impact Determination in the Housing Element EIR

There are undeveloped areas within the City that are located adjacent to large tracts of native habitat (e.g., Santa Monica Mountains, Griffith Park, Sullivan Canyon), which provide vegetative cover suitable for the movement of many terrestrial wildlife species, including medium to large-sized, mobile mammals with relatively large home ranges, such as coyote, deer, bobcat, grey fox, and mountain lion, and also provide foraging and breeding habitat for many species. Wildlife species can move through these vegetated areas routinely with some species also using concrete-lined or earthen stormwater channels in the area for movement.

Housing development could potentially occur within areas that support sensitive habitat (e.g., riparian areas, SEAs, undeveloped natural areas). Within these areas, potential development generally would be limited to improvements associated with low density residential uses, ADUs or conversions, depending on the zoning and land use designation of the parcels.

Even in more urbanized areas such as South Los Angeles and the Harbor Area, there are pockets of natural areas that are considered native wildlife nursery sites (e.g., Baldwin Hills, South LA Wetlands Park, Banning Park, and Harbor Lake). These areas have the potential to support nesting birds and other breeding wildlife. Development projects are required to comply with CFGC sections (e.g., Sections 3503, 3503.5, 3513, and 4150); thus, it is unlikely that housing development accommodated under the Housing Element Update would result in the disturbance or destruction of active nest sites or the unauthorized take of birds or nongame mammals. Nevertheless, if development activities directly (e.g., cutting of trees or other vegetation, or removal of man-made structures containing an active bird nest or denning wildlife) or indirectly (e.g., if activities sufficiently harassed birds to cause nest abandonment) affect nesting birds and nongame mammals, a violation of the CFGC would result.

Conclusion: Housing development accommodated by the Housing Element Update could interfere with the movement of any native resident or migratory fish or wildlife species or within established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Additionally, the Housing Element Update could result in development of parcels that may contain suitable nesting habitat for birds. Therefore, impacts to native resident, migratory fish and wildlife; established native resident or migratory wildlife corridors; or native wildlife nursery sites would be *potentially significant*.

Mitigation Measure: Refer to Mitigation Measure 4.3-1.

Level of Significance of Impact after Mitigation: To avoid impacts to wildlife corridors and the wildlife that rely on them, all potential wildlife movement pathways, including those with existing obstacles and constrictions, such as roads, pipelines, aqueducts, and landscaped or otherwise

altered terrain, must be identified and evaluated. While the measures identified under the Mitigation Measure 4.3-1 would help to reduce potential impacts to wildlife movement and nursery sites, projects sited within or adjacent to these areas have the potential to generate adverse edge effects that could significantly reduce the use of surrounding habitats by wildlife for movement through the area. Therefore, encroachment (e.g., night lighting, domestic animals, and urban noises) into these areas would reduce the overall size and function of the wildlife movement corridor or nursery site. Furthermore, as Mitigation Measure 4.3-1 would not apply to ministerial projects, the mitigation measures would not eliminate all potential impacts to special-status species from implementation of the project. Additionally, even with mitigation measures imposed depending on circumstances, impacts may still occur. Therefore, the Housing Element Update would result in a *significant and unavoidable* impact after mitigation.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in *Section 2 Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however, it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, the policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

Although urbanization has substantially reduced the abundance and diversity of biological resources in the city, the Housing Element EIR acknowledges there are pockets of natural areas and housing development accommodated under the 2021-2029 Housing Element could interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. However, the Housing Element EIR also anticipates that housing growth would occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types).

The 1,100 parcels under the Proposed Project are on the periphery of the city's hillsides along developed urban corridors, rather than deep within natural and undisturbed areas. These parcels would occur in geographic areas that are similar to those areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element), and in Higher Opportunity Areas. As such, development on these parcels would not increase impacts when compared to the analysis in the Housing Element EIR. Nonetheless, as with housing development under the 2021-2029 Housing Element, it is reasonably foreseeable that implementation of the Proposed Project could interfere with the movement of any native resident or migratory wildlife corridors. While the measures identified under the Mitigation Measure 4.3-1 would help to reduce potential impacts to wildlife movement and nursery sites, projects sited within or adjacent to these areas have the potential to generate adverse edge effects that could significantly reduce the use of surrounding habitats by wildlife for movement through the area. Therefore, encroachment (e.g., night lighting, domestic animals, and urban noises) into these areas would reduce the overall size and function of the wildlife movement corridor or nursery site. Furthermore, as Mitigation Measure 4.3-1 would not apply to ministerial

projects, the mitigation measures would not eliminate all potential impacts to special-status species from implementation of the project. Therefore, this impact would remain significant and unavoidable.

There are no proposed changes under the Proposed Project that would require major revisions to the Housing Element EIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to native resident, migratory fish and wildlife; established native resident or migratory wildlife corridors; or native wildlife nursery sites beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to native resident, migratory fish and wildlife; established native resident or migratory wildlife corridors; or native wildlife nursery sites beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
(d) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant Impact	No	No	No

A. Impact Determination in the Housing Element EIR

Housing development accommodated under the Housing Element Update would occur in areas on private property, street rights-of-way, and open space areas that are known and/or expected to have protected tree species. Housing development occurring within the City would be required to comply with the City's Tree Preservation Ordinance, which makes it illegal to relocate, remove, or fatally harm the trees without the issuance of a permit. The Housing Element Update does not include any components that would preclude implementation of or alter the requirements and procedures contained under this ordinance in any way.

The City identifies southern California black walnut as a protected tree species in accordance with Article 2 and 7 of Chapter I and Article 6 of Chapter IV and Section 96.303.5 of the LAMC (Ordinance 177404, "Protected Tree Ordinance"). In adopting that ordinance, the City did not make a determination that the California black walnut is rare in the City or otherwise and the City has not conducted any survey or study to make such a determination. In accordance with the Protected Tree Ordinance, the City requires that southern California black walnut trees that measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree that would be removed by a project be mitigated at a 1:1 ratio with a 15-gallon replacement tree. Based on the above, there is no evidentiary basis to find that the California black walnut is rare in the City, the County or the State.

Conclusion: In accordance with Mitigation Measure 4.3-2(a), impacts to walnut vegetation communities shall be mitigated through the preparation and implementation of a HMMP. The HMMP shall mitigate impacts to CDFW jurisdictional habitat at a 2:1 ratio for permanent impacts and a 1:1 ratio for temporary impacts, or as otherwise approved by CDFW and the City. Furthermore, assertion that a plant is rare without detailed studies can lead to unwarranted and costly expenditures for local government, non-profit groups, and other stakeholders, particularly in cases of infill development. In the case of southern California black walnut, adopted ordinances and/or policies suffice to protect and/or compensate for impacts to individual protected trees. Consistent with current City requirements, future development occurring under the project would be required to comply with the City's Tree Preservation Ordinance. Therefore, impacts related to local policies or ordinances protecting biological resources would be *less than significant*.

Mitigation Measures: No mitigation measures were required.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in *Section 2 Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however, it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable construction in these very targeted areas (i.e.,

approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, the policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

The Housing Element EIR anticipates that housing growth would occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types). Although the 1,100 parcels under the Proposed Project would occur in areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element) and in Higher Opportunity Areas, these parcels could contain protected tree species. However, housing development under the Proposed Project would also be required to comply with the City's Tree Preservation Ordinance, which makes it illegal to relocate, remove, or fatally harm the trees without the issuance of a permit. Moreover, in accordance with Mitigation Measure 4.3-2(a), impacts to walnut vegetation communities shall be mitigated through the preparation and implementation of a HMMP. Therefore, impacts related to local policies or ordinances protecting biological resources would remain less than significant.

There are no proposed changes under the Proposed Project that would require major revisions to the Housing Element EIR due to new significant impacts or substantially more severe impacts beyond what was previously analyzed in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

3.2 TRANSPORTATION

The analysis in this section is based on the Transportation Impacts Memorandum prepared for the Proposed Project by Fehr & Peers, dated September 13, 2024 and included as Appendix B to this Addendum.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant with Mitigation Incorporated	No	No	No

A. Impact Determination in the Housing Element EIR

As discussed in the Housing Element EIR, the Housing Element Update helps fulfill existing City of Los Angeles General Plan Framework strategies to encourage growth in higher-intensity commercial and mixed-use districts, centers, and boulevards, and in proximity to transit. The geographic distribution of the identified housing capacity will be consistent with recent build activity and while housing may occur anywhere in the City, it will mostly occur in areas of the City that are currently zoned for multi-family and commercial development, along commercial corridors and in proximity to public transportation. A large portion of the anticipated housing capacity is expected to be located within a half-mile radius around a Major Transit Stop. Based on the estimated capacity of 266,647 units, and the total target capacity of 486,379 units, the Housing Element finds a need for a Housing Element Rezoning Program for the creation of 255,432 additional units of capacity. The Housing Element Rezoning Program, which would need to be completed by February 2025, will likely be accomplished through updates to the City's Community Plans (Land Use Element), an update to the City's Density Bonus program, targeted zone changes, updates to specific plans and overlays, or other zoning ordinances. These programs would likely identify opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers, neighborhood services and amenities, and particularly in higher resource areas shown in Figure 3-5 to provide the most equitable distribution of housing opportunities. These programs may also consider rezoning or development incentives in existing lower density residential zones to create opportunities for missing middle housing typologies (up to low-medium residential density) in these areas. The outcome of full build-out of the RHNA under the Housing Element Update would be an increased level of development of infill sites and/or intensification of existing residential parcels, with a majority of the development occurring in locations within the City where neighborhood services are plentiful and multimodal transportation options, including public transit and active modes, are most competitive with driving. This will provide more opportunity for residents to choose housing close to their places of employment, shortening their work trips and perhaps even resulting in a shift in commute mode, and to complete more household-serving trips within their own neighborhoods, whether in a very short trip in a car or on foot or bike. Finally, any rezoning under the Housing Element Rezoning Program will need to be found consistent with the General Plan, including the Mobility Plan 2035, pursuant to Charter Section 556 and 558 and pursuant to State Planning and Zoning laws.

Conclusion: Most housing development accommodated by the Housing Element Update would generally not conflict with any applicable program, plan, ordinance, or policy relevant to the

transportation system, nor would it limit or preclude the City's ability to implement programs and policies in furtherance of climate or equity goals. However, larger projects or projects with unique site conditions or project attributes may have impacts from construction to the circulation system. Therefore, impacts are *potentially significant*.

Mitigation Measure:

4.14-1 Construction Management Plan

Any discretionary project that the Los Angeles Department of Transportation (LADOT) determines will have potential impacts to the circulation system even with application of existing regulatory compliance measures, shall prepare a detailed Construction Management Plan (CMP), including street closure information, detour plans, haul routes, and staging plans shall be prepared and submitted to LADOT for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include those elements required by LADOT for the project, which may include but are not limited to the following:

- Providing for temporary traffic control during all construction activities adjacent to public right of way to improve traffic flow on public roadways (e.g., flag men)
- Prohibition of construction worker parking on any adjacent residential streets
- Encouragement of carpool/vanpool of workers
- Prohibitions on construction-related vehicles parking on surrounding public streets
- Prohibitions on construction equipment or material deliveries within the public right-of-way
- Accommodation of all equipment on site as feasible
- Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag men)
- Scheduling of construction activities, including deliveries, to reduce the effect on peak hour traffic flow on surrounding arterial streets
- Rerouting of construction trucks to reduce travel on congested streets to the extent feasible
- Provisions of safety precautions for pedestrians and bicyclists through alternate routing and protection barriers and signage
- Provisions to accommodate the staging and storage of equipment
- Scheduling of construction-related deliveries to reduce travel during commuter peak hours
- Obtain necessary permits for any truck hauling from the City prior to issuance of any permit for the project.
- Noticing and coordination with any nearby schools that may be affected by construction activities, including deliveries, hauling and other construction transportation, to ensure safety of school children.
- Ensuring all feasible safety measures are taken to accommodate safe travel of pedestrian, bicyclists, and other users of the sidewalks around the construction site, including but not limited through the following measures:
 - Construction staging to maintain pedestrian access on adjacent sidewalks throughout all construction phases.

- Maintaining adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Providing temporary pedestrian facilities adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Keeping sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging.
- Reopening the sidewalk as soon as reasonably feasible taking construction and construction staging into account.

Level of Significance of Impact After Mitigation: With implementation of the Mitigation Measure 4.14-1 and existing regulations and project review by LADOT, impacts would be *less than significant with mitigation incorporated*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in Section 2, *Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, this policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

The Housing Element EIR anticipates that housing growth would occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types). The Proposed Project would occur in geographic areas that are similar to areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element), and in Higher Opportunity Areas. Comparative to housing development under the 2021-2029 Housing Element, the Proposed Project seeks to incentivize density in geographic areas that are adjacent to and characteristically similar to areas that are already zoned for dense use, including areas within a half-mile radius around a Major Transit Stop. The Proposed Project does not add new housing, but rather redistributes the housing assumptions within the same TAZs that were used in the Housing Element EIR analysis. Moreover, the Proposed Project would be consistent with goals of the 2021-2029 Housing Element relevant to the transportation system listed in the Housing Element EIR:

- Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.

- Goal 3: A City in which housing helps to create healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

As further stated in the Transportation Impacts Memorandum (Appendix B), the Proposed Project aligns with the programs outlined in the Housing Element including building upon existing policy tools, such as the City's existing incentive-based housing development programs. Furthermore, the Proposed Project is consistent with recent changes to State law that enable project streamlining and impose specific requirements on sites identified for lower income households. As there is no change to the circulation system assumptions, Mitigation Measure 14.4-1 would remain applicable to the Proposed Project. Impacts would remain less than significant with mitigation incorporated.

There are no proposed changes under the Proposed Project that would involve new significant impacts or substantially more severe impacts beyond what was identified in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to conflict with a program, plan, ordinance or policy addressing the circulation system beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to conflict with a program, plan, ordinance or policy addressing the circulation system beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
(b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less than Significant	No	No	No

A. Impact Determination in the Housing Element EIR

As discussed in the Housing Element EIR, full build-out of the Housing Element Update would result in a 34 percent decrease in vehicle miles traveled (VMT) compared to 2021 SCAG Region conditions and does not exceed the 15 percent below the regional average total VMT per service population threshold. Furthermore, full build out of the Housing Element Update would result in a 2 percent decrease in service population VMT compared to 2021 citywide Baseline conditions and does not exceed the average total VMT per service population threshold.

At a plan level, the Housing Element Update would not result in a significant impact to VMT. At the individual project level, utilizing a different evaluation methodology and with different thresholds, some projects may result in impacts to VMT. For the most part, however, development of new housing in existing neighborhoods where services already exist, as envisioned by the Housing Element Update, results in a reduction to VMT. For example, a multi-family development developed in a dense urban environment with multiple land uses and access to transit may reduce vehicle trip lengths as there are options for people to undertake their trips more locally, rather than needing to travel outside their neighborhood to meet their needs.

Conclusion: Even with some individual housing development projects exceeding VMT project thresholds, the Housing Element Update would not exceed the City's threshold of significance. Therefore, impacts would be *less than significant*.

Mitigation Measure: Although the Housing Element Update was determined to have a less than significant impact at the plan level, the following mitigation measure for a transportation demand management (TDM) program may be used by discretionary projects that show potentially significant impacts to VMT.

4.14-2 Transportation Demand Management Program

If a discretionary project will have significant impacts to VMT under LADOT Transportation Assessment Guidelines, the Applicant shall prepare a TDM program to reduce VMT impacts below the City's project threshold to the extent feasible. TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy. TDM measures shall include but not be limited to the following examples:

TDM strategies applicable for the residential component:

Unbundled Parking—Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership.

Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making.

TDM strategies applicable if the project includes an office component:

Required Commute Trip Reduction Program—This strategy involves the development of an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The program typically includes elements such as a coordinated ride-sharing or carpooling program, vanpool program, alternative work schedule program, preferential carpool parking, guaranteed ride home service, and a program coordinator. The program requires the development of metrics to evaluate success, program monitoring, and regular reporting.

TDM strategies applicable for both the office and residential components:

Promotions and Marketing—This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. It can also include more active promotional strategies such as gamification.

Level of Significance of Impact After Mitigation: With implementation of Mitigation Measure 14.4-2, some projects may not be able to reduce VMT impacts to less than significant at the individual project level. Nonetheless, even with some housing development projects accommodated by the Housing Element Update having significant impacts, VMT impacts associated with the Housing Element Update would remain *less than significant* under the City's thresholds of significance.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in Section 2, *Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, this policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12. However, the Housing Element EIR conservatively analyzed potential development in VHFHSZ.

The Housing Element EIR anticipates that housing growth would occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types). The Proposed Project would occur in geographic areas that are similar to areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build-out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element), and in Higher Opportunity Areas. Comparative to housing development under the 2021-2029 Housing Element, the Proposed Project seeks to incentivize density in geographic areas that are adjacent to and characteristically similar to areas that are

already zoned for dense use, including areas within a half-mile radius around a Major Transit Stop. The Proposed Project does not add new housing, but rather redistributes the housing assumptions within the same TAZs that were used in the Housing Element EIR analysis.

As stated in the Transportation Impacts Memorandum (Appendix B), the Proposed Project seeks to prevent low densities through minimum density requirements in the Higher Opportunity Areas than the Housing Element originally planned. VMT per service population would likely not change or may slightly improve by condensing the housing assumptions into these Higher Opportunity Areas. With no increase in the total number of units and marginally increased housing density, the impact conclusions from the Housing Element EIR would remain the same and Mitigation Measure 4.14-2 would continue to be applicable at the individual project level under the Proposed Project. Impacts would remain less than significant.

There are no proposed changes under the Proposed Project that would involve new significant impacts or substantially more severe impacts beyond what was identified in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to VMT beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to VMT beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	Significant and Unavoidable	No	No	No

A. Impact Determination in the Housing Element EIR

As discussed in the Housing Element EIR, any development proposal would be reviewed by the City for consistency with all City regulations, standards, and policies, including as they result in geometric design features, including the number and placement of driveways, lines of sight, and any necessary roadway modifications. It is assumed that any projects developed as a result of the Housing Element Update would be designed to meet all City standards such that they do not result in geometric design hazards.

However, as part of individual development project entitlements, the Interim Guidance for Freeway Safety Analysis released by LADOT in May 2020 requires that individual land use projects evaluate the potential for safety impacts related to freeway off ramp queuing. The specific concern relates to the possibility that the speed differential between vehicles traveling on freeway mainlines and vehicles queuing at freeway off-ramps may create the potential for collisions if drivers on the freeway mainline lack sufficient time to slow or stop once they are aware of a queuing situation. It is anticipated that freeway mainline traffic would slow at times when high levels of off ramp queuing occurs and that the speed differential would be sufficiently small that mainline drivers would have sufficient warning about a queuing situation; however, it is possible that queuing at individual off ramps could occur at times when mainline traffic congestion is low, thus creating a potential safety issue.

Conclusion: Most housing development accommodated by the Housing Element Update would generally not substantially increase hazards due to geometric design features or incompatible uses. However, larger projects or projects with unique site conditions or project attributes may have impacts during construction. Therefore, impacts related to construction activities are *potentially significant*. Moreover, because the Housing Element Update is programmatic in nature, it does not include specific development projects or details about the size, nature, or location of individual developments and future traffic levels and speeds at individual off ramps in and near the City cannot be predicted with any degree of certainty at this time because it is not known how conditions may change over the eight-year planning horizon and what measures the City and the California Department of Transportation (Caltrans) may implement to address any off ramp queuing issues that arise. Therefore, any detailed analysis of potential future impacts related to off ramp queuing would be speculative. Nonetheless, queuing-related safety issues could potentially arise as build out of the RHNA occurs in the City, although it is anticipated that the City and Caltrans would address any such issues as they arise, it cannot be determined with certainty that queuing related safety issues would not occur. As such, safety impacts related to off ramp queuing as growth occurs are *potentially significant*.

Mitigation Measure: Refer to Mitigation Measure 14.4-1.

Level of Significance of Impact After Mitigation: With implementation of Mitigation Measure 4.14-1, impacts related to construction hazards due to geometric design features or incompatible uses would be *less than significant with mitigation incorporated*. However, without specific information on where safety impacts may occur as a result of freeway off ramp queuing, it is not possible to identify appropriate mitigation measures to reduce project-specific ramp queuing safety impacts. Therefore, no feasible mitigation was identified for the Housing Element Update. It is anticipated that subsequent land use development projects that are seeking approval under the plan will study freeway queuing and safety impacts in more detail per the Interim Guidance for Freeway Safety Analysis released by LADOT. Impacts related to highway safety as a result of design features or incompatible uses would be *significant and unavoidable*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in Section 2, *Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable this construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, this policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

The Housing Element EIR anticipates that housing growth would occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types). The Proposed Project would occur in areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build-out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element), and in Higher Opportunity Areas. Comparative to housing development under the 2021-2029 Housing Element, the Proposed Project seeks to incentivize density in geographic areas that are adjacent to and characteristically similar to areas that are already zoned for dense use, including areas within a half-mile radius around a Major Transit Stop. The Proposed Project does not add new housing, but rather redistributes the housing assumptions within the same TAZs that were used in the Housing Element EIR analysis.

As stated in the Transportation Impacts Memorandum (Appendix B), while the Proposed Project does impose minimum development standards in some areas which could result in some larger projects or those with unique site conditions, there are no changes to the assumptions of total number of units within a given TAZ or to the RHNA build out totals. As such, the impact conclusions from the Housing Element EIR would remain the same. Mitigation Measure 4.14-1 would continue to be applicable at the individual project level under the Proposed Project to reduce impacts related to construction to less than significant with mitigation incorporated. However, similar to the analysis in the EIR without specific information on where safety impacts may occur as a result of freeway off ramp queuing, it is not possible to identify appropriate mitigation measures to reduce project-specific ramp queuing safety impacts under the Proposed Project. Impacts would remain significant and unavoidable related to freeway queuing.

There are no proposed changes under the Proposed Project that would involve new significant impacts or substantially more severe impacts beyond what was identified in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to hazards due to a geometric design feature beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to hazards due to a geometric design feature beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
(d) Result in inadequate emergency access?	Less than Significant with Mitigation Incorporated	No	No	No

A. Impact Determination in the Housing Element EIR

As discussed in the Housing Element EIR, any development proposal would be reviewed by the City for consistency with all City regulations, standards, and policies, including as they relate to issues of emergency access. Densification would largely occur within the community plan update process, allowing community plan areas to allocate the necessary public services in conjunction with expected growth in housing, such as location of emergency service stations and hospitals. Additionally, as most new housing would be located in high-resource areas served by public transit and providing a multimodal transportation network, it is possible that implementation of the Housing Element Update would result in increased transit ridership and active transportation, reducing the number of vehicles on the road and actually improving emergency access.

Conclusion: Most housing development projects accommodated by the Housing Element Update would not foreseeably have impacts to emergency access. However, larger projects or projects with unique site or project attributes may have impacts at construction. Therefore, housing development projects accommodated by the Housing Element Update impacts related to emergency access are *potentially significant*.

Mitigation Measure: Refer to Mitigation Measure 14.4-1.

Level of Significance of Impact After Mitigation: With implementation of Mitigation Measure 4.14-1, impacts related to inadequate emergency access during construction would be *less than significant with mitigation incorporated*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in Section 2, *Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable this construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, this policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

The Housing Element EIR anticipates that housing growth would occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types). The Proposed

Project would occur in areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build -out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element), and in Higher Opportunity Areas. Comparative to housing development under the 2021-2029 Housing Element, the Proposed Project seeks to incentivize density in geographic areas that are adjacent to and characteristically similar to areas that are already zoned for dense use, including areas within a half-mile radius around a Major Transit Stop. The Proposed Project does not add new housing, but rather redistributes the housing assumptions within the same TAZs that were used in the Housing Element EIR analysis.

As stated in the Transportation Impacts Memorandum (Appendix B), the Proposed Project increases the density possible on select Higher Opportunity Areas (i.e., 1,100 parcels) predominantly at the periphery of the city's hillsides within VHFHSZs, where evacuation and emergency services may be necessary in the event of a fire. However, these specific parcels are along major streets on edges of mountainous areas with access to the main street grid. These parcels are also adjacent to parcels that allowed for higher density in the Housing Element EIR, making the density of parcels along the same major street more similar in nature to one another.

The Proposed Project is not expected to increase housing density in areas that would be more difficult for emergency services to access, nor does it significantly increase the total number of housing units. In addition, the Los Angeles Fire Department (LAFD) provides online informational resources regarding fire and emergency preparedness (<http://www.lafd.org/faqs>). Given the same assumptions about construction management plans and LAFD response times and practices, the impact conclusions from the Housing Element EIR would remain the same. Mitigation Measure 4.14-1 would continue to be applicable at the individual project level under the Proposed Project to reduce impacts related to construction to less than significant with mitigation incorporated.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to inadequate emergency access beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to inadequate emergency access beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

3.3 WILDFIRE

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:				
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Significant and Unavoidable	No	No	No

A. Impact Determination in the Housing Element EIR

As discussed in the Housing Element EIR, areas at risk for wildfire in the City are concentrated around the hillsides and mountainous areas, such as the Santa Monica, Santa Susana, and San Gabriel Mountains. The only State Responsibility Area (SRA) lands in the City are two relatively small areas near the northeastern and northwestern boundaries of the City within the San Gabriel Mountains. These areas and the areas immediately adjacent are primarily zoned for low-density, single-family residential uses. The geographic distribution of development would largely occur in areas of the City that are currently zoned for multi-family residential and commercial development and designated as Higher Opportunity Areas.

Construction of individual housing developments in VHFHSZs could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within rights-of-way. However, temporary construction barricades or other construction-related obstructions used for project development that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. Implementation of these plans would limit the extent to which development under the Housing Element Update would impair or physically interfere with adopted emergency response or evacuation procedures. As part of standard development procedures, future housing development plans in VHFHSZs would be submitted for review and approval to ensure that all new development has adequate emergency access and escape routes in compliance with existing City regulations and complies with home hardening requirements and recommendations. For instance, the California Building Standards Code and LAMC include minimum requirements for driveway widths, the creation and maintenance of wildfire buffers, sprinklers, and alarms. Furthermore, the Housing Element Update would not introduce any features or policies that would preclude implementation of, or alter, these policies and procedures.

Conclusion: The City's extensive regulations and project review scheme would ensure that impacts related to impairment of adopted emergency response plan or emergency evacuation plan would be avoided. However, some areas designated as VHFHSZs or in or near SRAs are currently zoned for residential use and could be subject to future development accommodated by the Housing Element Update. Generally, the City's extensive regulatory and review scheme would be expected to avoid impacts. However, based on unusual site-specific, roadway or project aspects, development in such areas would have the potential to cause the impairment of an adopted emergency response plan or emergency evacuation plan due to the temporary obstruction of roads associated with construction activities on or near a designated emergency route. For those projects, implementation of Mitigation Measure 4.17-1 and 4.12-1(b) of Section 4.12, *Public Services*, of the Housing Element EIR would be expected to reduce the potential for obstruction of roadways by regulating construction-related staging and parking for projects in hillside areas. However, imposition of the mitigation measures on all projects is not feasible and

even with existing regulations and imposition of the measures, build out of the RHNA in or near an SRA or VHFSHZ areas could still result in a significant impact. Therefore, impacts would be *potentially significant*.

Mitigation Measure: Projects in a VHFSHZ or SRA must comply with Mitigation Measure 4.12-1(b) and the following measure where the LAFD has determined existing regulations are not adequate based on unusual site-specific conditions, roadway conditions, or project characteristics.

4.17-1 Hillside Construction Staging and Parking Plan

For discretionary projects for development located in or adjacent to an SRA or VHFSHZ, where LAFD finds it necessary to add additional conditions above existing regulations to reduce the risk of construction-related activities impairing an emergency response plan or emergency evacuation plan, prior to the issuance of a grading or building permit, the applicant shall submit a Construction Staging and Parking Plan to the Department of Building and Safety and the Fire Department for review and approval. The plan shall identify where all construction materials, equipment, and vehicles will be stored through the construction phase of the project, as well as where contractor, subcontractor, and laborers will park their vehicles as to prevent blockage of two-way traffic on streets in the vicinity of the construction site. The Construction Staging and Parking Plan shall include, but not be limited to, the following:

- No construction equipment or material shall be permitted to be stored within the public right-of-way.
- If the property fronts on a designated Red Flag Street, on noticed “Red Flag” days, all workers shall be shuttled from an off-site area, located on a non-Red Flag Street, to and from the site in order to keep roads open on Red Flag days.
- During the Excavation and Grading phases, only one truck hauler shall be allowed on the site at any one time. The drivers shall be required to follow the designated travel plan or approved Haul Route.
- Truck traffic directed to the project site for the purpose of delivering materials, construction-machinery, or removal of graded soil shall be limited to off-peak traffic hours, Monday through Friday only. No truck deliveries shall be permitted on Saturdays or Sundays.
- All deliveries during construction shall be coordinated so that only one vendor/delivery vehicle is at the site at one time, and that a construction supervisor is present at such time.
- A radio operator shall be on-site to coordinate the movement of material and personnel, in order to keep the roads open for emergency vehicles, their apparatus, and neighbors.
- During all phases of construction, all construction vehicle parking and queuing related to the project shall be as required to the satisfaction of the Department of Building and Safety, and in substantial compliance with the Construction Staging and Parking Plan, except as may be modified by the Department of Building and Safety or the Fire Department.

Level of Significance of Impact After Mitigation: Mitigation Measure 4.17-1 as well as Mitigation Measure 4.12-1(b) would be expected to reduce the risk of construction-related activities impairing an emergency response plan or emergency evacuation plan for those projects LAFD finds pose an unusual threat that existing regulations do not address by limiting parking on streets in areas subject to fire-hazard-related parking restrictions, limiting the amount of heavy machinery on a development site at a given time, regulating traffic related to construction and deliveries, and installing personnel to coordinate traffic to and from the development site. However, imposition of the mitigation measure on all ministerial projects is infeasible based on resource requirements

and for some development projects even with implementation of the mitigation measures impacts may result from unusual site-specific or road conditions, or project characteristics. Based on this information, impacts would be *significant and unavoidable*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in Section 2, *Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable this construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, this policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

The Housing Element EIR states that impacts related to wildfire would vary not necessarily by housing typology but by location and scale and scope of the project, specifically whether the housing development is in or near a SRA or a VHFHSZ, and whether the development would have the potential to impair an adopted emergency response plan or emergency evacuation plan due to temporary obstruction of a right-of-way associated with construction activities and increased traffic as a result of increased development. With respect to housing location, the Housing Element EIR anticipates that housing growth could occur anywhere in the City but would mostly occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types). As discussed under *Section 3.2, Transportation*, impact analysis (d), the Proposed Project increases the density possible on select Higher Opportunity Areas (i.e., 1,100 parcels) predominantly on the periphery of the city's hillsides within VHFHSZs; however, these areas are similar to areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build-out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element). Furthermore, these parcels are along major streets on edges of mountainous areas with access to the main street grid. The Proposed Project is not expected to increase housing density in areas that would be more difficult for emergency services to access, nor does it significantly increase the total number of housing units. In addition, the LAFD provides online informational resources regarding fire and emergency preparedness at <http://www.lafd.org/faqs>. Given the same assumptions about construction management plans and LAFD response times and practices, the impact conclusions from the Housing Element EIR would remain the same and the Proposed Project would not increase impacts when compared to the analysis in the Housing Element EIR. As with housing development under the 2021-2029 Housing Element, even with implementation of Mitigation Measures 4.17-1 and 4.12-1(b), development under the Proposed Project could result in potentially significant impacts related to emergency response plans or emergency evacuation plans. As the mitigation measure does not apply to ministerial projects and for some development projects even with implementation of the mitigation measures impacts may result from unusual site-specific or road conditions, or project characteristics. Impacts would remain significant and unavoidable.

There are no proposed changes under the Proposed Project that would involve new significant impacts or substantially more severe impacts beyond what was identified in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to emergency response plans or emergency evacuation plans beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified, that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to emergency response plans or emergency evacuation plans beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:				
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Significant and Unavoidable	No	No	No
(d) Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				

A. Impact Determination in the Housing Element EIR

Properties located in VHFHSZs as mapped by CAL FIRE and Fire Brush Clearance Zones are required to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, compliance with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD brush clearance requirements pursuant to the Los Angeles Fire Code. The undeveloped portions of the Santa Monica Mountains, the eastern slopes of the Santa Susana Mountains, and the southern slopes of the San Gabriel Mountains are generally designated for Open Space and development opportunities in these areas are limited. Development opportunities in hillside areas are further limited by single-family residential density regulations, slope density restrictions, and topography.

Individual project development accommodated under the Housing Element Update may be located in any area where the zoning permits residential uses, including lower density residential sites in hillside areas and in or in the vicinity of VHFHSZs or SRAs. Build out of the RHNA would generally be directed away from more fire-prone neighborhoods, including hillside areas at risk of the spread of wildfire and subsequent downslope flooding and landslides, though it is possible that some development under the Housing Element Update would occur in these areas.

All development would be subject to applicable response plans and would be required to comply with the vegetation management, building materials, and emergency access requirements. Fuel modification requirements dictate permanent vegetation management standards surrounding buildings, particularly in area in or near the SRA or a VHFHSZ. In the event of a wildfire, implementation of the County's Emergency Response Plan would coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient organization capable of managing emergency evacuation for affected areas. Furthermore, project development would be constructed according to the Los Angeles Fire Code requirements for fire-protection and would be subject to review and approval by the LAFD. The LAFD provides several fire development services to the City related to enforcing codes concerning new construction and remodeling, including Fire Life Safety Plan Checks and Fire Life Safety Inspections.

Conclusion: The City's extensive regulations and project review scheme would ensure that impacts related to build out of the RHNA in SRA or VHFHSZ areas exacerbating wildfire risks and resulting in risks to people and structures from pollutants, flooding and landslides would be avoided. New development would be required to comply with extensive regulations and fire safety provisions in the LAMC, including the Fire Code. Based on the regulatory scheme and project review process with LAFD; impacts should be avoided. Imposition of Mitigation Measures 4.12-1(a) through 4.12-1(d) where found necessary based on unusual site conditions or project characteristics should further reduce impacts to less than significant. However, it remains possible that even with existing regulations or imposition of mitigation measures, construction or other human activities related to development in or near an SRA or VHFHSZ of build-out of the RHNA could cause a wildfire in an area where slopes, winds, or other conditions could exacerbate the risk of exposure to pollutants, or where wildfires could expose people and structures to increased risks due to flooding or landslide. Impacts would be *potentially significant*.

Mitigation Measures: For any project in a VHFHSZ or SRA where the LAFD has determined existing regulations are not adequate based on unusual site-specific conditions, roadway conditions, or project characteristics, the project must comply with Mitigation Measure 4.12-1(a) through Mitigation Measures 4.12-1(d) of Section 4.12, *Public Services*, of the Housing Element EIR.

Level of Significance of Impact After Mitigation: Along with existing regulations, implementation of Mitigation Measures 4.12-1(a) through 4.12-1(d) would reduce impacts related to exacerbating wildfire risks that could result in risks to structures or housing development occupants or others to exposure of pollutant concentrations and runoff, post-fire slope instability or drainage changes. However, it is not feasible to impose the measures on ministerial projects based on the City resources needed to apply and enforce the new regulations on all housing developments. Additionally, it is possible that for some discretionary housing projects during the Housing Element Update plan horizon, Mitigation Measures 4.12-1(a) through 4.12-1(d) may be found infeasible. Based on unusual site-specific conditions or project characteristics, impacts of a housing development project under build out of RHNA may still occur with imposition of mitigation measures. Therefore, impacts would be *significant and unavoidable*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in *Section 2, Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable this construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, this policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

The Housing Element EIR states that the portions of the city that are subject to wildland fire risk are primarily areas where single-family residential development abuts the undeveloped hillsides and natural areas in the northern portion of the City and around the Santa Monica Mountains. The Housing Element EIR anticipates that housing growth could occur anywhere in the City but would mostly occur in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a

list of site types). The Housing Element EIR also acknowledges that housing development could occur on hillside areas and in or in the vicinity of VHFHSZs or SRAs. As discussed *under Section 3.2, Transportation*, impact analysis (d), the Proposed Project increases the density possible on select Higher Opportunity Areas (i.e., 1,100 parcels) predominantly on the periphery of the city's hillsides within VHFHSZs; however, these areas are similar to those areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build-out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element). The 1,100 parcels under the Proposed Project consist of urban infill sites rather than vacant sites deep within the undeveloped hillsides and other natural areas in the city and in an SRA or VHFHSZ. Therefore, the Proposed Project would not increase impacts when compared to the analysis in the Housing Element EIR.

Nonetheless, as discussed in the Housing Element EIR, implementation of Mitigation Measures 4.12-1(a) through 4.12-1(d) would reduce impacts related to exacerbating wildfire risks that could result in risks to structures or housing development occupants or others to exposure of pollutant concentrations and runoff, post-fire slope instability or drainage changes. However, mitigation measures would not apply to ministerial projects. Based on unusual site-specific conditions or project characteristics, impacts of a housing development project under build out of the RHNA may still occur with imposition of mitigation measures. Impacts would remain significant and unavoidable.

There are no proposed changes under the Proposed Project that would involve new significant impacts or substantially more severe impacts beyond what was identified in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to wildfires, and the risks associated with them, beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to wildfires and the risks associated with them beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:				
(c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would housing development accommodated by the Housing Element Update require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Significant and Unavoidable	No	No	No

A. Impact Determination in the Housing Element EIR

The Housing Element Update would prioritize the development of new housing in urbanized areas of the City. Under the Housing Element Update, the Housing Element Rezoning Program will prioritize areas near transit, jobs, and in Higher Opportunity Areas. Generally, development would occur in areas that are well-served by existing roadways and utilities infrastructure. Development in urbanized areas would not be anticipated to require additional roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk. Nonetheless, development in portions of the SRA and VHFHSZs currently zoned for low-density, single-family residential use remains a possibility. If such development takes place on land not served by existing roads, fuel breaks, emergency water sources, power lines, or other utilities, the construction of new infrastructure could be required. As a result, infrastructure development and ongoing use of new infrastructure could introduce human-caused ignition sources, such as the sparking of power utilities or the operation of construction equipment or other vehicles.

Although the installation and ongoing use of new infrastructure could be potential sources of wildfire ignition, risks would be reduced by existing State and local policies and safety measures. PRC Section 4290 requires adoption of minimum fire safety standards related to defensible space for residential, as well as commercial and industrial, properties in the SRA or, after July 1, 2021, a VHFHSZ. Relevant standards under this section include road standards for fire equipment access, as well as signs identifying streets, roads, and buildings. PRC Section 4292 mandates the maintenance of a specific circumference around poles and towers that support certain types of electrical utility apparatuses, while PRC section 4431 requires a clearance zone of at least 25 feet when operating certain types of power tools in an area covered by forest, brush, or grass. California Government Code Section 66474.02 mandates that the design of new subdivisions adhere to defensible space regulations and ingress and egress road standards for fire equipment. LAFD Fire Life Safety review of plans for new development would likely require fire hydrants along new roadways built to serve development in the SRA or a VHFHSZ. Nonetheless, new development on previously undeveloped sites could require the installation and maintenance of new or improved roads, emergency water sources, power lines or other utilities, the construction

and operation of which would introduce potential sources of wildfire ignition, such as the sparking of an overhead power line or construction equipment or the operation of resident vehicles.

Conclusion: Because the City currently does not require the undergrounding of power lines, a potentially significant impact may occur in areas subject to wildfire risk. Most development under the Housing Element Update would occur as infill development in previously developed area of the City situated neither in nor near SRAs or VHFHSZs and would not involve the risk of wildfires due to the installation of new associated infrastructure. However, certain areas of the SRA and VHFHSZs within the City are currently zoned for low-density, single-family residential uses, and single-family and ADU development could be accommodated in these areas under the Housing Element Update. Such new development in the SRA or VHFHSZs could require the construction and maintenance of new infrastructure, including aboveground power lines, which have been linked to exacerbation of wildfires. Although impacts are unlikely based upon existing regulations, impacts may occur based upon unusual site-specific conditions or aspects of the infrastructure project. Impacts would be *potentially significant*.

Mitigation Measures: The following mitigation measure would apply to discretionary projects.

4.17-3 Undergrounding of Power Lines in and Near an SRA and VHFHSZs

For all discretionary applications for development located in or within one mile of an SRA or VHFHSZs, that involve or require the installation of new power lines shall be required to install the new power line underground. Prior to the issuance of a grading or building permit, the applicant shall submit plans for undergrounding of power lines.

Level of Significance of Impact After Mitigation: Implementation of Mitigation Measure 4.17-3 would reduce the potential for impacts under this threshold by restricting power lines to underground in areas subject to wildfire risk. It is not feasible to impose the mitigation measure on all ministerial projects due to the required resources to implement. It is also possible that future discretionary projects may determine the measure is infeasible. Additionally, even with existing regulations and the mitigation measure based on unusual site-specific conditions or aspects of the infrastructure project, including power line project and others, may result in wildfire impacts from the installation or maintenance of infrastructure required by build out of the RHNA. Therefore, impacts remain *significant and unavoidable*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in *Section 2 Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable this construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, this policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

The Housing Element EIR anticipates that housing growth would occur anywhere in the City but mostly in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types). As discussed under *Section 3.2, Transportation*, impact analysis (d), the Proposed Project

increases the density possible on select Higher Opportunity Areas (i.e., 1,100 parcels) predominantly on the periphery of the city's hillsides within VHFHSZs; however, these areas are similar to those areas that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build-out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element). The 1,100 parcels under the Proposed Project consist of urban infill sites already well-served by existing roadways and utilities infrastructure. Therefore, the Proposed Project would not increase impacts when compared to the analysis in the Housing Element EIR as it is unlikely individual housing developments would require the installation and maintenance of new or improved roads, emergency water sources, power lines or other utilities.

Nonetheless, as discussed in the Housing Element EIR, implementation of Mitigation Measure 4.17-3 would reduce the potential for impacts under this threshold by restricting power lines to underground in areas subject to wildfire risk. However, the mitigation measure will not be imposed on all ministerial projects due to the required resources to implement. Additionally, even with existing regulations and the mitigation measure based on unusual site-specific conditions or aspects of the infrastructure project, including power line project and others, may result in wildfire impacts from the installation or maintenance of infrastructure required by build out of the RHNA. Impacts would remain significant and unavoidable.

There are no proposed changes under the Proposed Project that would involve new significant impacts or substantially more severe impacts beyond what was identified in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR due to the involvement of new or more severe significant impacts related to the installation or maintenance of infrastructure required by build out of the RHNA, beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to the installation or maintenance of infrastructure required by build out of the RHNA beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

Issues	Impact Determination in the Housing Element EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:				
(e) Would housing development accommodated by the Housing Element Update expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Significant and Unavoidable	No	No	No

A. Impact Determination in the Housing Element EIR

The Housing Element Update would generally direct future housing development away from neighborhoods, such as those near the urban-wildland interface, where the risk of wildland fires is heightened. However, individual project development accommodated under the Housing Element Update may be in any area where the zoning permits residential uses. Because many hillside areas in or adjacent to VHFHSZs or SRAs are zoned for low-density residential use, it remains possible that single-family and ADU development under the Housing Element Update may occur in the SRA or a VHFHSZ. To the extent any project development is located in or near VHFHSZs or SRAs as mapped by CAL FIRE and Fire Brush Clearance Zones, regulations require development to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, compliance with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD hazardous vegetation clearance requirements pursuant to the Los Angeles Fire Code.

Part 9 of the California Fire Code mandates minimum building requirements designed to “safeguards the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions, ...and provides safety and assistance to fire fighters and emergency responders.” The requirements apply to the construction, alteration, movement, or movement of buildings, in addition to repairs, operation of equipment, use and occupancy of buildings, means of egress, evacuation plans, location, maintenance, removal, and demolition of every building or structure or any appurtenances. PRC Section 4290 establishes minimum standards related to defensible space, including provisions for pertaining to road standards for fire equipment access; standards for signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fuel breaks and greenbelts. Applicable sections of the PRC mandate standards for firebreaks (Section 4292) and operation of power equipment (Sections 4427, 4428, 4431) intended to minimize risks in areas subject to wildfire. In addition, California Government Code Section 66474.02, also known as the Subdivision Map Act, prohibits the subdivision of parcels in a VHFHSZ, unless a city or county planning commission finds that the subdivision design and location are consistent with defensible space regulations in PRC Sections 4290 and 4291, public fire protection services would be available for structures located throughout the subdivision, and road designs meet standards for fire equipment ingress and egress per PCR Section 4290 and any local ordinance. Provisions in the Los Angeles Fire Code reinforce State safety regulation by defining standards for the design of fire access roads (Section 503), mandating fire safety procedures for the construction and demolition of structures (Section 3301-

3317), regulating the types of activities permitted within a VHFHSZ (Section 4908), and requiring that property owners in a VHFHSZ clear brush and other native vegetation within a 200-foot radius of a building (Section 57.322). In addition, project development would be required to be constructed according to the UBC requirements for fire-protection and would be subject to review and approval the LAFD Fire Life Safety Plan Check review process.

Conclusion: Most development accommodated under the Housing Element Update would occur as infill development in previously developed areas of the City situated neither in nor near the SRA or VHFHSZs and would likely not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires due to the implementation of existing State and local regulations. However, certain areas of the SRA and VHFHSZs within the City are zoned for low-density, single-family residential uses and could accommodate single family and ADU development under the Housing Element. In addition, based on this being a plan level analysis and the potential for unusual site-specific conditions, hazards or project characteristics, build out of the RHNA may result in impacts. Therefore, impacts are *potentially significant*.

Mitigation Measures: For any project in a VHFHSZ or SRA where the LAFD has determined existing regulations are not adequate based on unusual site-specific conditions, roadway conditions, or project characteristics, compliance with Mitigation Measures 4.17-1 and 4.12-1(a) through Mitigation Measure 4.12-1(d) is required. For all discretionary applications for development located in or within one mile of an SRA, implementation of Mitigation Measure 4.17-3 is required.

Level of Significance of Impact After Mitigation: Along with existing regulations, implementation of Mitigation Measures 4.17-1 and 4.17-3 would reduce the risk of construction-related activities and the potential for impacts associated with power lines in areas subject to wildfire risk. In addition, implementation of Mitigation Measures 4.12-1(a) through 4.12-1(d) require plan reviews by LAFD, emergency access plans, and hillside fire/vegetation management plans, which would reduce demands on LAFD for fire protection services. However, it is not feasible to impose the measures on ministerial projects based on the City resources needed to apply and enforce the new regulations on all housing developments. Additionally, it is possible that for some discretionary housing projects during the Housing Element Update plan horizon, implementation of Mitigation Measures 4.12-1(a) through 4.12-1(d), 4.17-1 and 4.17-3 may be found infeasible. Based on unusual site-specific conditions or project characteristics, impacts of a housing development project under build out of RHNA may still occur with imposition of mitigation measures. Therefore, impacts would be *significant and unavoidable*.

B. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in *Section 2 Project Description*, the Housing Element EIR analysis contemplated potential development in VHFHSZs, however it did not contemplate a specific program (i.e., properties using the Mixed Income Incentive Program under the Citywide Housing Incentive Program Ordinance) that would enable this construction in these very targeted areas (i.e., approximately in VHFHSZs on Ventura Boulevard; or that are abutting, across the street or alley, or having a common corner with properties not in a VHFHSZ). For this reason, this policy direction under the Proposed Project has been identified as a potential change to the project analyzed as part of the Housing Element EIR. This exception to the prohibition of development in the VHFHSZs would apply to approximately 1,100 parcels predominantly at the periphery of the city's hillsides in areas including the South Valley along Ventura Boulevard as well as in areas of Northeast Los Angeles and Hollywood, as shown in Figure 3 through Figure 12.

The Housing Element EIR states that the portions of the city that are subject to wildland fire risk are primarily areas where single-family residential development abuts the undeveloped hillsides and natural areas in the northern portion of the City and around the Santa Monica Mountains. The Housing Element EIR anticipates that housing growth would occur anywhere in the City but mostly in areas already developed with residential uses or areas with potential for residential development (refer to the *Section 3.1, Biological Resources*, impact analysis (a) for a list of site types). As discussed under *Section 3.2, Transportation*, impact analysis (d), the Proposed Project increases the density possible on select Higher Opportunity Areas (i.e., 1,100 parcels) predominantly on the periphery of the city's hillsides within VHFHSZs; however, these areas are similar to those that the Housing Element EIR identified for the Rezoning Program or where the highest concentration of build out of the RHNA would occur (i.e., already developed areas near public transit, jobs, in existing growth areas identified in the Framework Element). The 1,100 parcels under the Proposed Project consist of urban infill sites rather than vacant sites deep within the undeveloped hillsides and other natural areas in the city and in an SRA or VHFHSZ. Therefore, the Proposed Project would not increase impacts when compared to the analysis in the Housing Element EIR.

Nonetheless, as discussed in the Housing Element EIR, implementation of Mitigation Measures 4.17-1 and 4.17-3 would reduce the risk of construction-related activities and the potential for impacts associated with power lines in areas subject to wildfire risk. In addition, implementation of Mitigation Measures 4.12-1(a) through 4.12-1(d) require plan reviews by LAFD, emergency access plans, and hillside fire/vegetation management plans, which would reduce demands on LAFD for fire protection services. However, the mitigation measures is not imposed on ministerial projects. Based on unusual site-specific conditions or project characteristics, impacts may still occur with imposition of mitigation measures. Impacts would remain significant and unavoidable.

There are no proposed changes under the Proposed Project that would involve new significant impacts or substantially more severe impacts beyond what was identified in the Housing Element EIR.

C. Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

Refer to *Section 1.5, Changes to Circumstances*, for discussion of recent State housing laws and how they do not affect the analyses presented in the Housing Element EIR. There are no substantial changes to the circumstances under which the Proposed Project is being undertaken that would require major revisions to the Housing Element EIR related to exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, beyond what was previously analyzed in the Housing Element EIR.

D. Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the Housing Element EIR was certified that shows the Proposed Project involves new significant impacts or substantially more severe impacts related to exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires beyond what was previously analyzed in the Housing Element EIR.

E. Conclusion

The Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a subsequent or supplemental EIR.

4 CONCLUSION

As demonstrated by the discussion in this Addendum, the potential impacts associated with the Proposed Project would be similar to the impacts addressed in the Housing Element EIR and would not result in new or more severe significant impacts than those identified in the Housing Element EIR. As such, the Proposed Project would not result in any of the conditions set forth in PRC Section 21166 or *CEQA Guidelines* Sections 15162 or 15163 that would require the preparation of a Subsequent or Supplemental EIR.

Appendix A

Housing Element EIR Mitigation Monitoring Program

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5 MITIGATION MONITORING PROGRAM

Public Resources Code (PRC) Section 21081.6 and California Environmental Quality Act (CEQA) Guidelines Section 15097 require adoption of a Mitigation Monitoring Program (MMP) for all projects for which an Environmental Impact Report (EIR) has been prepared. Specifically, PRC Section 21081.6 states:

“...the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment...[and that the program] ...shall be designed to ensure compliance during project implementation.”

CEQA Guidelines Section 15097 provides guidelines for implementing monitoring and reporting programs. Specific monitoring requirements to be enforced during project implementation must be defined prior to final approval of a project by the decision-maker. Although the Lead Agency (the City of Los Angeles) may delegate monitoring responsibilities to other agencies or entities, the Lead Agency “...remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.”

The MMP describes the procedures for the implementation of the mitigation measures adopted for the Proposed Project. The MMP for the Proposed Project will be in place through the planning horizon of the Housing Element Update (2029), or until the element and EIR are updated again, whichever is later, or for individual development projects for which the mitigation measures have been imposed, the MMP is effective until the mitigation measures have been satisfied or deleted/modified pursuant to this MMP. The City of Los Angeles Department of City Planning (DCP) staff and staff of other City Departments (e.g., Department of Building and Safety) are responsible for administering the MMP activities, or delegating them to consultants or contractors. The Monitoring or Enforcing Agencies identified herein, at their discretion, may require a project applicant or operator to pay for one or more independent professional(s), with any necessary training and qualifications, to be responsible for preparing, reviewing, or certifying any required report, study, analysis, or certification, or monitoring implementation of mitigation measures (e.g., City building inspector, project contractor, certified professionals, etc., depending on the requirements of the mitigation measures) required of project applicants or operators. Monitors would be hired by the City or by the applicant or operator at the City’s discretion.

Each mitigation measure is identified in Table 5-1 and is categorized by environmental topic and corresponding number, with identification of:

- The Implementing Party– this is in most cases, the applicant for individual projects who will be required to implement most of the measures subject to City review and approval.
- The Enforcement Agency and Monitoring Agency – this is the agency or agencies that will monitor each measure and ensure that it is implemented in accordance with this MMP.
- Monitoring Phase / Monitoring Actions – this is the timeframe that monitoring would occur and the criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.

All the identified mitigation measures are to be implemented through the City's imposition of conditions of approval on future discretionary projects. These mitigation measures shall be imposed as a condition of approval subject to the City's authority to condition the applicable entitlement for any subsequent environmental review pursuant to CEQA Guidelines Sections 15162, 15163, 15164, or 15168, or tiered clearance to the Housing Element 2021-2029 and Safety Element Updates EIR, pursuant to the procedures in CEQA Guidelines Section 15152 or streamlining CEQA Clearance as permitted in PRC Sections 21083, 21094.5, 21155-21155.2, 21155.4 or CEQA Guidelines Sections 15183 or 15183.3. Nothing herein requires the mitigation measures in this MMP to be imposed on projects which are categorically or statutorily exempt from CEQA or for which an independent environmental analysis and findings were prepared in compliance with CEQA. Mitigation measures imposed as a condition of approval shall be imposed with a MMP that includes all of the following provisions:

- (1) This MMP shall be enforced throughout all phases of development projects subject to the mitigation measures. The Applicant shall be responsible for implementing each mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each project design feature and mitigation measure has been implemented. The Applicant shall maintain records demonstrating compliance with each project design feature and mitigation measure. Such records shall be made available to the City upon request. Further, specifically during the construction phase (including excavation, grading and demolition) and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the mitigation measures during construction every 90 days. The documentation must be signed by the Applicant and Construction Monitor and be maintained by the Applicant. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the mitigation measures within two business

days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency. Until two years after all mitigation measures are fully satisfied, the Applicant and Owner shall maintain all records of mitigation measure compliance (e.g., reports, studies, certifications, verifications, monitoring or mitigation plans) and make available for the City's inspection within three business days of the City requesting the records. All records related to construction shall be maintained on the site during construction and shall be immediately available for inspection by the City or by the Construction Monitor. The Applicant/Owner shall also sign a Statement of Compliance, in a form approved by the City, prior to any building permit, committing to compliance with all applicable mitigation measures.

- (2) Modifications. The project shall be in substantial conformance with the mitigation measures contained in this MMP. The enforcing departments or agencies may determine substantial conformance with mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, including sections 15162 and 15164, by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the mitigation measures. Any addendum or subsequent CEQA clearance shall explain why the mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a mitigation measure shall not require a modification to any project discretionary approval unless the Director of Planning also finds that the change to the mitigation measures results in a substantial change to the Project or the non-environmental conditions of approval.

Table 5-1 Mitigation Monitoring Program

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
Air Quality			
4.2-2(a) Construction Emissions Reduction			
<p>For discretionary projects that meet the following criteria, prior to project approval, the Applicant shall be required to provide to the City an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze construction emissions and identify necessary mitigation:</p> <ul style="list-style-type: none"> • Demolition of more than 13,500 square feet of building area; • Greater than 5,000 cubic yards of soil cut/fill; • Greater than 5-acres of graded area; or use of more than ten pieces of heavy-duty construction equipment and 150 truck trips (or a total of 6,000 vehicle miles traveled by truck) on any given day during demolition, site clearing, or grading. <p>The Air Quality Impact Analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are not limited to, the following mitigation:</p> <ul style="list-style-type: none"> • Off-road diesel-powered construction equipment greater than 50 horsepower shall be certified for either the Tier 4 Final emission standards for CARB In-Use Off-Road Diesel-Fueled Fleets Regulations or the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of NOX and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the onsite air quality construction mitigation manager that the use of such devices is not practical for specific engine types. • All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's 	Applicant for individual project	Department of City Planning (DCP), Los Angeles Department of Building and Safety (LADBS)	<p>Prior to project approval: review and approve the Air Quality Impact Analysis;</p> <p>During grading, excavation, demolition and construction: monitor compliance</p>

¹ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<p>certified tier specification, BACT documentation, and ARB or SCAQMD operating permit shall be provided.</p> <ul style="list-style-type: none"> Vehicle idling shall be limited to five minutes as set forth in the California Code of Regulations, Title 13. Signs shall be posted in areas where they will be seen by vehicle operators stating idling time limits. Heavy duty diesel-fueled equipment shall use low NOx diesel fuel to the extent that it is available and feasible to use. Construction haul truck operators for demolition debris and import/export of soil shall use trucks that meet the California Air Resources Board's (CARB) 2010 engine emissions standards at 0.01 grams per brake horsepower-hour of PM and 0.20 grams per brake horsepower-hour of NOx emissions. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and shall make these records available for inspection upon request by the City of Los Angeles or the South Coast Air Quality Management District (SCAQMD). Construction contractors shall utilize construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that they are available and feasible to use. Equipment such as tower cranes and signal boards shall be electric or alternative fueled (i.e., non-diesel). Pole power shall be made available for use for electric tools, equipment, lighting, etc. Construction equipment such as tower cranes and signal boards shall utilize electricity from power poles or alternative fuels (i.e., non-diesel), rather than diesel power generators and/or gasoline power generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible. Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors. The determination of commercial availability of such equipment will be made by the City prior to issuance of grading or building permits based on applicant provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence 			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<p>obtained by the City from expert sources such as construction contractors in the region.</p> <ul style="list-style-type: none"> Consistent with SCAQMD Rule 403, construction contractors shall identify and implement best available dust control measures during active construction operations capable of generating dust. Construction contractors shall maintain construction equipment in good, properly tuned operating condition, as specified by the manufacturer, to minimize exhaust emissions. Documentation demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications shall be kept on-site and made available to LADBS inspectors during inspection. Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. Construction activities shall be discontinued during second-stage smog alerts (when feasible). A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site. If infeasible to stop work, i.e., in the instance of a continuous concrete pour, construction activities shall be limited to those activities necessary to complete the immediate job. For projects where continuous pour activities will extend past the typical construction day: <ul style="list-style-type: none"> Concrete trucks shall have an average capacity of 10 cubic yards to minimize the number of concrete truck trips. Contractor shall use local concrete suppliers with 90 percent or more of the concrete supplied by one or more facilities within a driving distance of less than 5 miles per one-way trip or 10 miles round trip where feasible. Contractor shall be required to use alternatively fueled concrete trucks that achieve the same or lower NOx emissions as CNG-fueled concrete trucks to the extent feasible. The level of feasibility/infeasibility shall be approved by the City prior to the beginning of concrete pouring activities. During plan check, applicant shall make available to SCAQMD a comprehensive inventory of all of road trucks and concrete trucks to be used for the project, including horsepower rating, engine production year, and certification of the specified equipment. 			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.2-2(b) Operations Emissions Reduction			
<p>For discretionary projects, prior to project approval, the Applicant shall be required to provide the City an Air Quality Impact Analysis prepared by a qualified air quality analyst to analyze operational emissions and identify necessary mitigation for any discretionary project that would include more than 462 single-family residential units, 612 multi-family residential units, or any equivalent combination thereof. The Air Quality Impact Analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds, and as applicable may include, but are not limited to, the following mitigation:</p> <ul style="list-style-type: none"> • Implementation of a Transportation Demand Management Plan. <ul style="list-style-type: none"> • Installation of additional electric vehicle charging stations • Public infrastructure improvements (e.g., bus stop shelter improvements) • Carpool or ridesharing programs • Subsidized transit costs • Unbundled parking costs • Bicycle amenities (storage, showers, lockers, etc.) • Use of all-electric appliances (i.e., elimination of natural gas service). • Use solar or low emission water heaters that exceed Title 24 requirements. • Increased walls and attic insulation beyond Title 24 requirements. • Property management plan that obligates property manager to use of low-VOC paints and coatings, meeting SCAQMD standards, for property management and required use of electric yard and landscaping equipment, including lawnmowers, leaf-blowers, and chainsaws. 	Applicant for individual project	DCP, LADBS	<p>Prior to project approval: review and approve the Air Quality Impact Analysis, any required TDM Plan or Property Management Plan, and condition any necessary assurances and commitments of compliance.</p> <p>Prior to building permits, ensure any necessary assurances and commitments of compliance are obtained.</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.2-3 Construction TAC Reduction Measures			
<p>For discretionary projects with an anticipated construction duration of greater than 18-months and located within 500 feet of a residence or other sensitive receptor, prior to issuance of a permit to construct, the applicant shall provide to the City an Air Quality Impact Analysis, prepared by a qualified air quality analyst, that includes a construction health risk assessment. If the analysis shows incremental cancer risk would exceed 10 persons in one million at a sensitive receptor or the calculated Hazard Index for chronic or acute risks would exceed a value of 1.0 at a sensitive receptor, the air quality analyst shall prepare a mitigation plan subject to City review and approval that reduce TACs to less than SCAQMD thresholds. The applicant shall comply with all mitigation measures in the mitigation plan.</p> <p>Alternatively, no Air Quality Impact Analysis, health risk assessment, and mitigation plan shall be required for discretionary projects conditioned to use construction equipment that meets the CARB Tier 4 Final or USEPA Tier 4 off-road emissions for all equipment rated 50 horsepower or greater. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.</p>	Applicant for individual project	DCP, LADBS	<p>Prior to project approval: review and approve an Air Quality Impact Analysis with a Health Risk Assessment; or condition for applicant to provide necessary assurances to use Tier 4 equipment with necessary CARB or SCAQMD operating permit (if applicable).</p> <p>Prior to building permits: verify necessary assurances provided</p>
Biological Resources			
4.3-1(a) Biological Resources Reconnaissance Survey and Reporting			
<p>For all discretionary projects that require vegetation removal, ground disturbance, staging of vehicles, equipment, or materials, and access routes on natural (e.g., native, virgin) or disturbed but undeveloped (e.g., unpaved, areas barren, or ruderal), areas that contain or have the potential to support special-status species, sensitive habitat, or within 300 feet of suitable habitat to support special-status species (e.g., nesting passerines) as determined by the Department of City Planning, including through consultation with CDFW, the project applicant shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of Proposed Project on wildlife corridors.</p>	Applicant for individual project	Department of City Planning (DCP)	<p>Prior to project approval: review and approve biological resource assessment, condition project, if necessary, regarding identified wildlife corridors</p> <p>Prior to building permits: ensure any identified wildlife corridors are not closed by project;</p> <p>During Construction/grading; monitor compliance</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<p>Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate.</p> <p>If sensitive species and/or habitat are absent from the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to Department of City Planning (DCP) prior to project approval, and the project may proceed without any further biological investigation. If wildlife corridors are present, the report shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely closed by any development or improvements occurring within the Project Area.</p>			
4.3-1(b) Sensitive Species/Habitat Avoidance: Pre-Construction Bird Nest Surveys, Avoidance, and Notification			
<p>For all discretionary projects where sensitive species and/or habitat are identified in the biological resources assessment prepared pursuant to MM 4.3-1(a), the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and California Department of Fish and Wildlife (CDFW) prior to ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the</p>	Applicant for individual project	DCP, California Department of Fish and Wildlife (CDFW)	<p>Prior to project approval: review and approve biological resources assessment including necessary surveys and avoidance, relocation, plans, etc.</p> <p>Prior to issuance of grading permit; ensure plans show requirement to avoid bird nest and BMPs</p> <p>During construction (including excavation, grading, and demolition): monitor compliance</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<p>monitoring and species relocation shall be prepared and submitted to DCP and CDFW following construction.</p> <p>Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 100-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s), construction monitoring, and implementation of protective measures conducted shall be prepared by a qualified biologist.</p> <p>Proposed Project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.</p>			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.3-1(c) Focused Surveys for Rare Plants			
<p>If indicated as appropriate by the biological resources assessment report required in Mitigation Measure 4.3-1(a), focused surveys for special status plants shall be conducted. Prior to vegetation clearing for construction in open space areas, special status plants identified in the focused surveys shall be counted and mapped and a special-status plant relocation plan shall be developed and implemented to provide for translocation of the plants. The plan shall be prepared by a qualified biologist and shall include the following components: (1) identify an area of appropriate habitat, on-site preferred; (2) depending on the species detected, determine if translocation will take the form of seed collection and deposition, or transplanting the plants and surrounding soil as appropriate; (3) develop protocols for irrigation and maintenance of the translocated plants where appropriate; (4) set forth performance criteria (e.g., establishment of quantitative goals, expressed in percent cover or number of individuals, comparing the restored and impacted population) and remedial measures for the translocation effort; and (5) establish a five-year monitoring procedures/protocols for the translocated plants. Five years after initiation of the restoration activities, a report shall be submitted to DCP and CDFW, which shall at a minimum discuss the implementation, monitoring, and management of the restoration activities over the five-year period and indicate whether the restoration activities have, in part or in whole, been successful based on the established performance criteria. The restoration activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP, and CDFW.</p>	Applicant for individual project	DCP, CDFW	<p>Prior to project approval: review and approve the Plant Relocation Plan</p> <p>During construction (including excavation, grading, and demolition): monitor compliance</p> <p>Five years after restoration activities or as extended: review and approve the restoration report</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.3-1(d) Adaptive Management Plan			
If indicated as appropriate in a reconnaissance, pre-construction or focused survey required in Mitigation Measure 4.3-1(a), (b), or (c) the biologist shall prepare an Adaptive Management Plan for future operations to ensure that operations will not result in impacts to special status species, such as lighting plans, fencing plans, revegetation plans, and/or necessary covenants to ensure property owners maintain their properties in a way to reduce impacts to native species, such as requirements for keeping domestic animals or use of non-native vegetation, and/or education campaigns. Applicants shall prepare necessary documentation and provide adequate assurances to ensure compliance with ongoing operational requirements, including, but not limited to, such measures as filing of covenants, creation of funding mechanism, or provision of bonds.	Applicant for individual project	DCP, CDFW	Prior to project approval: review and approve Adaptive Management Plan; condition to obtain necessary assurances and commitments for continued compliance Prior to issuance of building permit: ensure necessary assurances for continued compliance obtained
4.3-2(a) Habitat Mitigation and Monitoring Plan			
For discretionary projects that are in areas potentially containing sensitive natural communities or jurisdictional waters and riparian habitat, including streams, wetlands, riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project, prior to the project approval, the applicant shall prepare and submit a Habitat Mitigation and Monitoring Program (HMMP), which shall mitigate for impacts to CDFW jurisdictional habitat at a 2:1 ratio for permanent impacts and a 1:1 ratio for temporary impacts, or as otherwise approved by CDFW and the City. The HMMP shall mitigate for impacts to jurisdictional areas via an acceptable mitigation approach that involves one or a combination of the on-site or off-site restoration or enhancement of degraded in-kind habitats, preservation of in-kind habitats, or by a contribution to an in-lieu fee program approved by the City, CDFW (and USACE, RWQCB, if applicable). The final HMMP shall be developed by a qualified biologist, restoration ecologist or resource specialist and submitted to and approved by the City and CDFW (USACE, RWQCB, if applicable), in compliance with Clean Water Act Sections 401 and 404 and California Fish and Game Code Section 1602 and supporting regulations, prior to issuance	Applicant for individual project	DCP, CDFW If applicable: U.S. Army Corps of Engineers (USACE), Los Angeles Regional Water Quality Control Board (RWQCB)	Prior to project approval: review and approve the Habitat Mitigation and Monitoring Program (HMMP); verify approval from CDFW Annually after issuance Certificate of Occupancy: review and approve the annual reports regarding the HMMP Five years after issuance of Certificate of Occupancy: review and approve the final report

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<p>of a grading permit for the project. In broad terms, this Program shall at a minimum include:</p> <ul style="list-style-type: none"> • Description of the project/impact and mitigation sites; • Specific objectives; • Success criteria; • Plant palette; • Implementation plan; • Maintenance activities; • Monitoring plan; and • Contingency measures. <p>Success criteria shall at a minimum be evaluated based on appropriate survival rates and percent cover of planted native species, as well as eradication and control of invasive species within the restoration area.</p> <p>The target species and native plant palette, as well as the specific methods for evaluating whether the project has been successful at meeting the above-mentioned success criteria shall be determined by the qualified biologist, restoration ecologist, or resource specialist and included in the HMMP.</p> <p>The HMMP shall be implemented over a five-year period and shall incorporate an iterative process of annual monitoring and evaluation of progress and allow for adjustments to the program, as necessary, to achieve desired outcomes and meet success criteria. Annual reports discussing the implementation, monitoring, and management of the HMMP shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable). Five years after project start, a final report shall be submitted to the City and the CDFW (USACE, RWQCB, if applicable), which shall at a minimum discuss the implementation, monitoring and management of the mitigation project over the five-year period, and indicate whether the HMMP has met the established success criteria. The annual reports and the final report shall include as-built plans submitted as an appendix to the report. Restoration will be considered successful after the success criteria have been met for a period of at least two years without any maintenance or remediation activities other than invasive species control. The project shall be extended if the success criteria have not been met at the end of the five-year period to the satisfaction of the City and the CDFW (USACE, RWQCB, if applicable).</p>			

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4.3-2(b) Protected Tree and Tree Canopy Survey			
<p>For discretionary projects that include the removal of trees, prior to project approval, a tree report and tree replanting plan shall be conducted by a certified arborist to tag and assess all trees (defined as woody plant material that is five inches or greater in diameter at breast height [DBH – four and a half feet off grade]) subject to the City’s Protected Tree Ordinance on the project site. Trees shall be tagged to correspond with a tree exhibit map. Also, the genus and species of the trees, size of the trees at DBH, and structure and vigor of the trees shall be determined, and an evaluation of the trees’ resource value (i.e., the biological impacts of the tree removals, potential to be considered wildlife habitat, and locating trees deserving protection) shall be completed. All protected trees shall receive a visual tree assessment (VTA – meaning tree observations shall be from the ground and that no special devices [e.g., increment borers, drills] shall be used). Following the completion of the tree survey, the arborist shall prepare a report that shall at a minimum provide a description of the general character of the trees on the site and identify opportunities and constraints for preservation. The report and tree replanting plan shall be provided to the City for review. As part of the assessment, a plot plan shall also be prepared indicating the location, type, and canopy coverage of all existing trees on the site and within the adjacent public right(s)-of-way.</p> <p>Based on the results of the tree survey, development plans shall be clustered to maximum extent feasible in order to avoid impacts to sensitive natural communities (e.g., oak woodlands, riparian habitats, extensive tree canopy) and to maintain the largest and most contiguous area of sensitive communities on the site. Additionally, the development plans shall include a proposed minimum buffer to protect adjacent sensitive communities. Development plans that impact sensitive natural communities shall include a detailed feasibility analysis showing how the design has accomplished these avoidance strategies; the City shall not approve development plans until the site design has adequately demonstrated maximum avoidance of sensitive natural communities to the satisfaction of City Planning.</p> <p>Further, removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.</p>	Applicant for individual project	DCP, Department of Public Works (DPW), Urban Forestry Division (UFD), Bureau of Street Services (BSS)	<p>Prior to project approval: review and approve tree report, tree planting plan, and plot plan of all existing trees on-site and adjacent public rights of way; review project for compliance with mitigation requirement to avoid sensitive natural communities: condition project to comply with tree replanting plan and site plan and provide necessary assurances for compliance</p> <p>Prior to issuance of grading permit: review site plans for compliance with conditions and obtain necessary assurances</p> <p>During construction: monitoring</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<p>The following measures shall be implemented in addition to those required under the City's Protected Tree Ordinance (Ordinance No. 177,404) to avoid and/or compensate for potential indirect impacts to preserved sensitive natural communities before, during, and following construction activities.</p> <p><i>Pre-Construction</i></p> <ul style="list-style-type: none"> Fencing: Protective fencing at least three feet high with signs and flagging shall be erected around all preserved sensitive natural communities where adjacent to proposed vegetation clearing and grubbing, grading, or other construction activities. The protective fence shall be installed at a minimum of five feet beyond the tree canopy dripline. The intent of protection fencing is to prevent inadvertent limb/vegetation damage, root damage and/or compaction by construction equipment. The protective fencing shall be depicted on all construction plans and maps provided to contractors and labeled clearly to prohibit entry, and the placement of the fence in the field shall be approved by a qualified biologist prior to initiation of construction activities. The contractor shall maintain the fence to keep it upright, taut and aligned at all times. Fencing shall be removed only after all construction activities are completed. Pre-Construction Meeting: A pre-construction meeting shall be held between all site contractors and a registered consulting arborist and/or a qualified biologist. All site contractors and their employees shall provide written acknowledgement of their receiving sensitive natural community protection training. This training shall include, but shall not be limited to, the following information: (1) the location and marking of protected sensitive natural communities; (2) the necessity of preventing damage to these sensitive natural communities; and (3) a discussion of work practices that shall accomplish such. <p><i>During Construction</i></p> <ul style="list-style-type: none"> Fence Monitoring: The protective fence shall be monitored regularly (at least weekly) during construction activities to ensure that the fencing remains intact and functional, and that no encroachment has occurred into the protected natural community; any repairs to the fence or encroachment correction shall be conducted immediately. Equipment Operation and Storage: Contractors shall avoid using heavy equipment around the sensitive natural communities. Operating heavy machinery around the 			

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<p>root zones of trees would increase soil compaction, which decreases soil aeration and, subsequently, reduces water penetration into the soil. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected zones, unless where specifically approved in writing and under the supervision of a registered consulting arborist and/or a qualified biologist.</p> <ul style="list-style-type: none"> Materials Storage and Disposal: Contractors shall not store or discard any construction materials within the fenced protected zones and shall remove all foreign debris within these areas. The contractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. Contractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (anti-freeze) shall be disposed of properly. The contractors shall ensure that equipment be parked at least 50 feet, and that equipment/vehicle refueling occur at least 100 feet, from fenced protected zones to avoid the possibility of leakage of equipment fluids into the soil. Grade Changes: Contractors shall ensure that grade changes, including adding fill, shall not be permitted within the fenced protected zone without special written authorization and under supervision by a registered consulting arborist and/or a qualified biologist. Lowering the grade within the fenced protected zones could necessitate cutting main support and feeder roots, thus jeopardizing the health and structural integrity of the tree(s). Adding soil, even temporarily, on top of the existing grade could compact the soil further, and decrease both water and air availability to the tree roots. Contractors shall ensure that grade changes made outside of the fenced protected zone shall not create conditions that allow water to pond. Trenching: Except where specifically approved in writing beforehand, all trenching shall be outside of the fenced protected zone. Roots primarily extend in a horizontal direction forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. A registered consulting arborist shall ensure that all pruning cuts shall be clean and sharp, to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may ultimately result in tree mortality. Use of both root pruning and Air-Spade equipment shall be accompanied only by 			

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<p>hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary.</p> <ul style="list-style-type: none"> Erosion Control: Appropriate erosion control best management practices (BMPs) shall be implemented to protect preserved sensitive natural communities during and following project construction. Erosion control materials shall be certified as weed free. Inspection: A registered consulting arborist shall inspect the preserved trees adjacent to grading and construction activity on a monthly basis for the duration of the grading and construction activities. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the registered consulting arborist following each inspection. <p><i>Post-construction</i></p> <ul style="list-style-type: none"> Mulch: The contractors shall ensure that the natural duff layer under all trees adjacent to construction activities shall be maintained. This would stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The contractors shall ensure that the mulch be kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay causing fungal pathogens. Should it be necessary to add organic mulch beneath retained oak trees, packaged or commercial oak leaf mulch shall not be used as it may contain root fungus. Also, the use of redwood chips shall be avoided as certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any added organic mulch added by the contractors shall be applied to a maximum depth of 4 inches where possible. Watering Adjacent Plant Material: All installed landscaping plants near the preserved sensitive natural communities shall require moderate to low levels of water. The surrounding plants shall be watered infrequently with deep soaks and allowed to dry out in-between, rather than frequent light irrigation. The soil shall not be allowed to become saturated or stay continually wet, nor should drainage allow ponding of water. Irrigation spray shall not hit the trunk of any tree. The contractors shall maintain a 30-inch dry-zone around all tree trunks. An above ground micro-spray irrigation system shall be used in lieu of typical underground pop-up sprays. 			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<ul style="list-style-type: none"> Monitoring: A certified arborist shall inspect the trees preserved on the site adjacent to construction activities for a period of two years following the completion of construction. Monitoring visits shall be completed quarterly, totaling eight visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be prepared. Additionally, any tree mortality shall be noted and any tree dying during the two-year monitoring period shall be replaced at a minimum 3:1 ratio on-site in coordination with the City. 			
Cultural Resources			
4.4-1(a) Identification of Built-Environment Historical Resources			
<p>For discretionary projects, the following procedures shall be implemented to identify historical resources, as defined by Public Resources Code Section 21084.1, located on or near a development site and implement appropriate techniques to avoid or reduce significant impacts to historical resources.</p> <p>The City of Los Angeles Historic Resources Survey (SurveyLA) results shall be consulted to determine whether the project area, or adjacent areas, have been subject to previous cultural resources studies and whether historical resources were identified.</p> <p>If a development involves the alteration or demolition of a property 45 years of age or older that was not evaluated in SurveyLA, including sites with a QQQ code, a historical resources evaluation shall be prepared for the development. The evaluation shall be prepared according to the following standards:</p> <ul style="list-style-type: none"> The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation (OHP) and the City of Los Angeles Office of Historic Resources (OHR) to identify any potential historical resources within the Area of Potential Effects. 	Applicant for individual project	DCP, Office of Historic Resources (OHR)	Prior to approval of project: check SurveyLA; review and approve any historical resource evaluation and mitigation plan.

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Those buildings and structures required to be assessed in a historical resource evaluation not located in an HPOZ shall be evaluated within their historic context and documented in a report meeting the OHP and OHR guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the OHR for review and concurrence. If, as a result of the cultural resources records search or the subsequent historical resources evaluation, it is determined that the proposed development would result in a significant adverse effect to one or more historical resources, appropriate techniques consistent with the Secretary of Interior Standards to avoid or reduce significant impacts to the degree feasible shall be implemented. Measures to reduce impacts shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary under the circumstance (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a mitigation plan identifying measures for the treatment or protection of character-defining features shall be provided to the City for review. Measures may include but not be limited to mitigation measures 4.4-1(b) to 4.4-1(j) below.			
4.4-1(b) Rehabilitation of Historical Resources			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If a development proposes alteration or addition to a historical resource to allow for its continued use, the integrity of the resource could be undermined such that it would no longer convey the historical associations that make it eligible for listing. To reduce such impacts, a resource may be rehabilitated in conformance with the Secretary's Standards to allow for continued or new uses while maintaining features that convey the resource's historical significance. Construction of a project as it relates to rehabilitation of a historical resource shall be monitored for compliance with the Secretary's Standards. The construction monitoring shall:</p> <ul style="list-style-type: none"> Be performed by a professional meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) for historic architecture with at least five years of demonstrated experience in rehabilitating historic buildings of similar size. 	Applicant for individual project	DCP, OHR	<p>Prior to project approval: condition monitoring and necessary assurances of compliance</p> <p>During alteration or addition of a historical resource: monitoring</p> <p>During construction: review and approve the technical memoranda developed throughout the alteration activities</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<ul style="list-style-type: none"> Be performed by the professional at regular intervals during the rehabilitation of the historical resource. The intervals shall include, but not necessarily limited to 50 percent, 90 percent, and 100 percent construction. <p>The monitor shall create a technical memorandum at each interval summarizing the findings, making recommendations as necessary to ensure compliance with the Secretary's Standards, and documenting construction with digital photographs. Compliance with the Secretary's Standards shall include the review specifications, tests, and mockups for the treatment of historic building materials.</p> <p>The monitor shall submit the memoranda to City of Los Angeles Office of Historic Resources (OHR) for concurrence. In the event OHR does not concur, all activities shall cease until compliance with the Secretary's Standards is resolved and concurrence is obtained.</p>			
4.4-1(c) Design Requirements for New Construction			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If a development proposes new construction on a site containing a historical resource, the project design team shall consult with a preservation architect or other qualified professional to ensure that new construction is designed and constructed in accordance with the Secretary of Interior's Standards to ensure the proposed new construction would protect the historic integrity of the historical resource and any adjacent historical resources. The final design shall require the approval of OHR. In the event OHR does not concur, all activities shall cease until compliance with the Secretary's Standards is resolved and concurrence is obtained.</p>	Applicant for individual project	DCP, OHR	<p>Prior to approval of project or building permit: review and approve the design plan</p> <p>During construction: monitoring</p>
4.4-1(d) Relocation and Rehabilitation of Historical Resources			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For any project for which retention or rehabilitation of a historical resource is not feasible, a feasibility study, subject to City review and approval, shall be prepared weighing the costs, advantages, and disadvantages of relocation, which would preclude the demolition of a resource by removing it intact to another site. If the study concludes it is feasible to</p>	Applicant for individual project	DCP, OHR	<p>Prior to project approval or building permit: review and approve the feasibility study; if relocation is feasible a Relocation and Rehabilitation Plan will be reviewed and approved by OHR</p>

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<p>relocate the historical resource, the structure's availability shall be advertised in historic preservation websites such as HistoricForSale, Historic Properties, Old Houses, and Preservation Directory and a local newspaper such as the Los Angeles Times for a period of not less than 60 days by the project applicant. Any such relocation efforts shall be undertaken in accordance with a Relocation and Rehabilitation Plan prepared by the party taking possession of the structure to be moved. The Relocation and Rehabilitation Plan shall be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards (PQS) for History, Architectural History, or Architecture, pursuant to 36 CFR 61. The Plan shall include relocation methodology recommended by the National Park Service, which are outlined in the booklet entitled "Moving Historic Buildings," by John Obed Curtis (1979). Upon relocation of the structure to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary's Standards. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Los Angeles Office of Historic Resources (OHR) prior to its implementation. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on the historical resource. If after three months it is evident that no party is interested in purchasing the historical resource per the mitigation measure stipulated above, then the Historic American Building Survey (HABS) Level II documentation, as described below in Mitigation Measure 4.4-1(e), would be required to document the important history and architecture of the historical resource. Relocation shall not take place until the historical resource is first recorded pursuant to the HABS Level II requirements.</p> <p>Any relocation activities undertaken by third parties shall be fully completed prior to the commencement of construction activities. The relocated historical resource shall be moved in accordance with all applicable regulatory requirements, including those applicable provisions of Chapter 83 of the Los Angeles Building Code, and shall be moved during off-peak hours so as to avoid potential traffic impacts.</p>			<p>Prior to building permits; verify that relocation of the building has occurred</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.4-1(e) Historic American Building Survey Documentation			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If significant historical resources are identified on a development site and avoidance or compliance with the Secretary's Standards is not possible, prior to development activities, the project applicant shall prepare a Historic American Buildings Survey (HABS) Level II documentation for the historical resource and remaining historic property setting. The HABS document shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's PQS for History, Architectural History, or Architecture, pursuant to 36 CFR 61. This document shall record the history and architecture of the property, as well as important events or other significant contributions to the patterns and trends of history with which the property is associated, as appropriate. The property's physical condition, both historic and current, shall be documented through site plans; historic maps and photographs; original as-built drawings; large format photographs; and written data. Building exteriors, representative interior spaces, character-defining features, as well as the property setting and contextual views shall be documented. Field photographs and notes shall also be included. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. The HABS documentation shall be submitted to the National Park Service for transmittal to the Library of Congress, and archival copies shall be sent to the City of Los Angeles Office of Historic Resources (OHR) and Los Angeles Public Library. Per the Secretary of the Interior's Standards for Architectural and Engineering Documentation, preparation of the HABS document serves to "[provide] important information on a property's significance for use by scholars, researchers, preservationists, architects, engineers and others interested in preserving and understanding historic properties."²</p>	Applicant for individual project	DCP, OHR	<p>Prior to project approval: review and approve HABS document or condition project to prepare HABS document or and provide necessary assurances to comply</p> <p>Prior to issuance of grading permit: review and approve the Historic American Buildings Survey documentation and/or obtain necessary assurances</p>

² National Park Service. "Archaeology and Preservation: Secretary of the Interior's Standards and Guidelines [As Amended and Annotated], Secretary of the Interior's Standards for Architectural and Engineering Documentation," n.d. https://www.nps.gov/history/local-law/arch_stnds_6.htm. Accessed April 9, 2021.

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.4-1(f) Interpretive Program			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If avoidance of the historical resource is not feasible, the project shall include an interpretive display located on the property which addresses the historical context and architectural or historical significance of the resource and informs the public about the history and original configuration of the property. The display shall be reviewed and approved by the City prior to installation at a site to be chosen by the City.</p>	Applicant for individual project	DCP, OHR	<p>Prior to project approval: approve interpretive program or condition project to prepare interpretive program and provide necessary assurances for compliance</p> <p>Prior to building permits: review and approve the plan for interpretive program or ensure necessary assurances obtained</p>
4.4-1(g) Construction Monitoring, Salvage, and Reuse			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>If retention of a historical resource is not feasible, and the historical resource is significant for its architectural design or construction method, the project applicant shall retain a qualified architectural historian or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualifications Standards (PQS) for Architectural History to conduct construction monitoring and salvage during demolition. Any important historic fabric associated with the historical resource's period of significance shall be fully recorded in photographic images and written manuscript notes. Prior to the commencement of demolition, significant material shall be inventoried and evaluated for potential salvage, analysis, reuse, and interpretation. The qualified architectural historian or historic preservation professional shall prepare the necessary written and illustrated documentation in a construction monitoring and salvage report. This document shall record any historically significant construction methods completed during the period of significance as well as document the historical resource's present physical condition through site plans; historic maps and photographs; sketch maps; digital photography; and written data and text.</p> <p>A salvage and reuse plan shall be created, identifying elements and materials that can be saved prior to the issuance of a demolition permit. The plan shall be prepared by a qualified architectural historian or historic preservation professional with demonstrated</p>	Applicant for individual project	DCP, OHR	<p>Prior to project approval or demolition permit: approve salvage and reuse plan or condition project to provide salvage and reuse plan and provide necessary assurances to ensure compliance</p> <p>Prior to issuance of demolition permit: approve salvage and reuse plan and/or obtain necessary assurances</p> <p>During demolition: monitor</p> <p>Prior to issuance of building permit: review and approve the construction monitoring salvage report</p>

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<p>experience in developing salvage and reuse plans. The plan shall be submitted to the City of Los Angeles Office of Historic Resources. Elements and materials that may be salvageable include: windows, doors, roof tiles, decorative elements, framing members, light fixtures, plumbing fixtures, and flooring materials such as tiles and hardwood. The salvageable items shall be removed in the gentlest, least destructive manner possible. The plan shall identify the recipient(s) for the items.</p> <p>All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and for Archaeological Documentation for above ground structures. The completed documentation shall be placed on file at the South Central Coastal Information Center, California State University, Fullerton, California; and the City of Los Angeles Public Library. Findings shall be incorporated into the Historic American Buildings Survey (HABS) report.</p>			
4.4-1(h) Temporary Protective Relocation			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For projects for which development would have the potential to cause damage to a historical resource and the resource cannot be protected in place, if feasible, the resource may be temporarily relocated to prevent such damage. Prior to development, the applicant shall contact stakeholders directly via letter detailing the location of the project site, its potential impact on the resource, project timeframe, identification of the affected resource, proposed procedures for removal resource or parts of resource with affected, where and for how long the resource would be stored, how it would be secured, and other relevant details. Photographic and documentary recordation of the potentially impacted resource shall be completed by a qualified architectural historian meeting the PQS for Architectural History. Prior to any construction or demolition activities that have the potential to damage the resource, elements that cannot be reasonably protected in place shall be carefully removed by a qualified restoration contractor. Each removed element shall be promptly stored at a secured off-site location. Following completion of project construction, reinstallation of each affected element at its original documented location shall occur [by a qualified restoration contractor] with work completed to the satisfaction of the OHR, and the Department of Public Works Bureau of Engineering, and other interested parties. Excavation and construction activities in the vicinity of the</p>	Applicant for individual project	DCP, OHR, DPW	<p>Prior to project approval: condition project to provide notice and to provide necessary assurances to ensure compliance</p> <p>Prior to demolition permit: verify that stakeholders were notified with all required information and/or obtain assurances</p> <p>During and after demolition: field verify reinstallation of affected elements at their original documented location; review and approve the monitoring report</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
resource and work conducted by the restoration contractor to remove, store, and replace affected elements, shall be monitored by a qualified historic preservation consultant meeting the PQS for Architectural History and documented in a monitoring report that shall be provided to OHR.			
4.4-1(i) Excavation and Shoring Plan			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For projects in which excavation and shoring have the potential to damage a historical resource in close proximity to the project site, an excavation and shoring plan shall be implemented to reduce the likelihood that earth-moving activities will result in damage to the historical resource due to earth moving activities. Procedures shall be implemented for shoring system design and monitoring of pre-excavation, grading, and shoring activities:</p> <ul style="list-style-type: none"> Excavation and shoring plans and calculations for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems and hired under the excavation subcontractor. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and the recommendations of the Project Geotechnical Engineer. Maximum allowable lateral deflections for the project site are to be developed by the Geotechnical Engineer in consideration of adjacent structures, property, and public rights-of-way. These deflection limits shall be prepared in consideration of protecting adjacent historic resources. The shoring engineer shall produce a shoring design, incorporating tie-backs, soldier piles, walers, or other means of reinforcement, that is of sufficient capacity and stiffness to meet or exceed the strength and deflection requirements. Calculations shall be prepared by the shoring engineer showing the anticipated lateral deflection of the shoring system and its components and demonstrating that these deflections are within the allowable limits. Where tie-back anchors shall extend across property lines or encroach into the public rights-of-way, appropriate notification and approval procedures shall be followed. The final excavation and shoring plans shall include all appropriate details, material specifications, testing and special inspection requirements and shall be reviewed by the Geotechnical Engineer for conformance with the design intent and 	Applicant for individual project	DCP, LADBS	<p>Prior to project approval: condition project to prepare excavation and shoring plan and provide necessary assurances to ensure compliance</p> <p>Prior to issuance of grading permit: review and approve the final excavation and shoring plans</p>

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<p>submitted to the Los Angeles Department of Building and Safety (LADBS) for review and approval during the grading permit application submission. The Geotechnical Engineer shall provide on-site observation during the excavation and shoring work.</p> <ul style="list-style-type: none"> The general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare an Adjacent Structures Construction Monitoring Plan, subject to review and approval by LADBS, prior to initiation of any excavation, grading, or shoring activities to ensure the protection of adjacent historic resources from damage due to settlement during construction and excavation. The Adjacent Structures Construction Monitoring Plan shall be carried out by a California Professional Land Surveyor and establish survey monuments and document and record through any necessary means, including video, photography, survey, etc. the initial positions of adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. to form a baseline for determining settlement or deformation. Upon installation of soldier piles, survey monuments shall be affixed to the tops of representative piles so that deflection can be measured. The shored excavation and adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. shall be visually inspected each day. Survey monuments shall be measured at critical stages of dewatering, excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results. Appropriate parties shall be notified immediately, and corrective steps shall be identified and implemented if movement exceeds predetermined thresholds, calculated amounts, or if new cracks or distress are observed in adjacent structures, sidewalks, buildings, utilities, facades, etc. In the event that settlement due to excavation or construction activity causes damage requiring touch-ups or repairs to the finishes of adjacent historic buildings, that work shall be performed in consultation with a qualified preservation consultant and in accordance with the California Historical Building Code and the Secretary's Standards, as appropriate. <p>Foundation systems are to be designed in accordance with all applicable loading requirements, including seismic, wind, settlement, and hydrostatic loads, as determined by the California Building Code and in accordance with the recommendations provided by the Geotechnical Engineer.</p>			

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4.4-1(j) Structural Construction Monitoring			
<p>If required under the mitigation plan in the historical resources evaluation prepared under MM 4.4-1(a), comply with the following measure.</p> <p>For developments in which excavation and shoring have the potential to damage a historical resource in close proximity to the project site, construction monitoring shall be implemented to minimize damage to nearby historical resources. The construction monitoring shall be performed by a licensed structural engineer with at least five years of demonstrated experience in rehabilitating historic buildings of similar size. A survey of the existing foundations and other structural aspects of historical resources in close proximity to the site shall be conducted to establish baseline conditions and provide a shoring design to protect the historical resources from potential damage. The survey shall take place prior to any construction activities. Pot holing or other destructive testing of the below grade conditions on the development site and immediately adjacent to the nearby historical resources may be necessary to establish baseline conditions and prepare the shoring design. A construction monitor shall submit to OHR a pre-construction survey that establishes baseline conditions to be monitored during construction, prior to issuance of any building permit for the development. The monitoring process shall include a meeting with the project contractor prior to the demolition and/or excavation activities to discuss minimizing damage to historical resources in close proximity.</p>	Applicant for individual project	DCP, OHR, LADBS	<p>Prior to project approval: condition project to provide necessary monitoring and provide necessary assurances to ensure compliance</p> <p>Prior to issuance of grading permit: obtain necessary assurances to ensure pre-construction survey, meeting with the project contractor, and monitoring</p> <p>During construction; monitoring compliance</p>
4.4-2 Archaeological Resources			
<p>Discretionary projects that involve ground disturbance in native soils or soils of unknown origin, shall implement the following procedures to identify archaeological resources located in a development site and implement applicable impact reduction techniques to reduce substantial adverse effects associated with the inadvertent discovery of archaeological resources.</p> <p>A. The project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (PQS) in archaeology to complete a cultural resources assessment of the development site. A cultural resources assessment may include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present.</p>	Applicant for individual project	DCP, OHR, affiliated California Native American Tribal Representative	<p>Prior to project approval: review and approve the cultural resources assessment of development; obtain necessary assurances to ensure compliance</p> <p>Prior to grading permit: obtain necessary assurances to ensure compliance</p> <p>During all ground disturbing activities: monitoring if required by cultural resources assessment;</p>

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<p>Archival research should include a records search conducted at the South Central Coastal Information Center (SCCIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC).</p> <p>B. If prehistoric or historic archaeological remains are identified as a result of the SCCIC or SLF searches, the remains shall be avoided and preserved in place where feasible.</p> <p>C. Where preservation is not feasible, each resource shall be evaluated for significance and eligibility to the California Register. Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains.</p> <p>D. Excavation at Native American sites shall be monitored by a geographically affiliated tribal representative, as agreed upon in any formal consultation proceedings with the geographically affiliated tribe or as indicated by the NAHC. If no tribal monitor is available, the monitoring shall be done by a qualified archaeologist.</p> <p>E. Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the remains shall be determined using radiocarbon dating and other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards.</p> <p>F. Following laboratory analysis, the significance of the sites shall be evaluated according to the criteria of the California Register. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation (OHP) publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (http://ohp.parks.ca.gov/pages/1054/files/armr.pdf).</p> <p>G. Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated by an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.</p>			<p>if archeological resources are uncovered, verify that a qualified archeologist evaluates and prepares a treatment plan; monitoring to ensure that construction in the area ceases until the treatment plan process is complete</p>

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<p>H. If the resources meet California Register significance standards, the City shall ensure that all feasible recommendations for impact reduction of archaeological impacts are incorporated into the final design and permits issued for development. Necessary Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the Secretary of the Interior's PQS for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the OHP Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.</p> <p>I. If recommended by a cultural resources assessment, prior to issuance of a grading permit and prior to the start of any ground-disturbing activity, the applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's PQS to oversee an archaeological monitor who shall be present during construction excavations, such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project, including peripheral activities, such as sidewalk replacement, utilities work, and landscaping, which may occur adjacent to the project site. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist. Prior to commencement of excavation activities, Archaeological Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the qualified archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.</p> <p>J. In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer within which construction activities shall not be allowed to continue shall be established by the qualified archaeologist around the find. Work shall be allowed to continue outside of the buffer area. All archaeological resources</p>			

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<p>unearthed by project development activities shall be evaluated by the qualified archaeologist. If a resource is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If, in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.</p> <p>K. As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.</p>			
Geology and Soils			
4.5-1(a) Paleontological Procedures for Discretionary Projects			
<p>For all discretionary projects that involve excavation or grading activities at depths greater than previous disturbance on the respective site(s), prior to the start of construction, the following shall be conducted as discussed in detail below: prepare a resource assessment and records search for the presence of paleontological resources to determine if the project site is underlain by paleontological resources; monitor all excavation and grading activities in areas underlain by soils or geologic units potentially containing paleontological resources; and identify, record, and evaluate all paleontological resources uncovered during project construction and submit a</p>	Applicant for individual project	DCP, OHR, LADBS	Prior to project approval: review and approve the paleontological resource assessment and records search, monitoring plan and worker education plan; condition project to comply with any

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<p>paleontological assessment report to the City for review and approval. In addition, during project construction, the following shall be conducted as discussed in detail below: cease all construction activities in the event of the discovery of paleontological resources; conduct fossil recovery as necessary by a qualified paleontologist; avoid handling of paleontological resources by parties other than the qualified paleontologist responsible for conducting fossil recovery; and resume construction activities only upon clearance by the qualified paleontologist. These procedures, as detailed below, shall be implemented to avoid impacts to paleontological resources or reduce potential impacts to a less-than-significant level:</p> <ul style="list-style-type: none"> • Prior to excavation and grading activities, a qualified paleontologist shall prepare a resource assessment and records search for the potential presence of paleontological resources. This assessment shall be informed by records from the Natural History Museum of Los Angeles County. • If the assessment determines the project site is underlain by soils or geologic units with a medium to high potential for containing paleontological resources, a qualified paleontologist shall prepare a monitoring plan, and worker education plan. The paleontologist's assessment and any required monitoring or required worker education plan shall be submitted to the City for review and approval prior to the commencement of construction activities. Any monitoring plan shall include requiring compliance with Mitigation Measure 4.5-1(d) for discovery, salvage and treatment. 			monitoring plan or worker education plan
4.5-1(b) Worker Environmental Awareness Program, Fossil Salvage, and Construction Monitoring			
<p>If required by cultural resources assessment under MM 4.5-1(a), prior to the start of construction, a paleontological monitor shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff, and notice that the identified qualified paleontologist is the only one authorized to handle paleontological find(s), including but not limited to collection and removal. Approved plans shall include statement of WEAP requirement.</p>	Applicant for individual project	DCP, OHR	Prior to grading permits, obtain necessary assurances to ensure WEAP plan requirement are met; ensure plans show WEAP requirement

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4.5-1(c) Construction Monitoring			
If required pursuant to a monitoring plan prepared under MM 4.5-1(a), a paleontologist or designated paleontological monitor shall monitor ground disturbance activities, including the initial five feet below the ground surface, as areas with high paleontological sensitivity may contain resources at shallow depths and within the first five feet. If the paleontological monitor determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated if any new or unforeseen deeper ground disturbances are required. After ground disturbing activities are completed, the paleontologist or designated monitor shall complete and submit a report to the City verifying compliance with the monitoring plan. Monitoring plan shall show on the plans.	Applicant for individual project	DCP, OHR	Prior to grading permits, obtain necessary assurances to ensure monitoring plan compliance, including compliance with mitigation measure 4.5-1(d) for discovery, salvage and treatment; ensure plans show monitoring plan requirements During all ground disturbing activities: monitor compliance Prior to building permit: obtain verification report
4.5-1(d) Fossil Discovery, Salvage, and Treatment			
<p>All discretionary projects shall be subject to the following mitigation measure:</p> <p>Discovery. If paleontological resources are uncovered during construction activities (in either a previously disturbed or undisturbed area), all ground-disturbing activities in the area of the find shall cease until a qualified paleontologist has evaluated the find, and identified and prepared an appropriate mitigation plan, in accordance with federal, state, and local guidelines, Construction activities in the area of the discovery shall commence again only after the identified resource(s) are properly processed by a qualified paleontologist, and if construction activities are cleared by the qualified paleontologist to continue. If cleared by the qualified paleontologist, construction activity may continue unimpeded on other portions of the project site that would not affect evaluation or recovery of the identified resource(s).</p> <p>Fossil Salvage and Treatment. The qualified paleontologist or designated paleontological monitor shall recover intact fossils consistent with the mitigation plan and notify the City of any fossil salvage and recovery efforts. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive</p>	Applicant for individual project	DCP, OHR	<p>Prior to project approval: condition project to comply with requirement and obtain necessary assurances to ensure compliance</p> <p>Prior to grading permit: verify site plan shows requirement and obtain necessary assurances</p> <p>During fossil salvage: monitor compliance</p>

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excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Any fossils shall be handled and deposited consistent with a mitigation plan prepared by the paleontological monitor. The qualified paleontologist shall prepare a report according to current professional standards including those of the SVP that describes the resource, how it was assessed, and disposition. The report shall be submitted to the City. The requirements in this mitigation measure shall be shown on plans.			
Hazards and Hazardous Materials			
4.7-2a Environmental Site Assessment			
<p>(1) Applicability Threshold. Discretionary projects that require grading, excavation, or building permit from LADBS and which meet the criteria below shall comply with the standard in (2):</p> <ul style="list-style-type: none"> Located on or within 500 feet of a Hazardous Material site listed on the following databases: <ul style="list-style-type: none"> SWRCB GeoTracker (refer to https://geotracker.waterboards.ca.gov); DTSC EnviroStor (refer to https://www.envirostor.dtsc.ca.gov/public); DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov); LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/public-records); Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-records-requests); SCAQMD Facility Information Detail (refer to https://xappprod.aqmd.gov/find); or 	Applicant for individual project	DCP, LADBS, Los Angeles Fire Department (LAFD)	<p>Prior to project approval or prior to grading permits: review and approve the Phase I Environmental Site Assessment (ESA), if no Recognized Environmental Conditions (REC), no further documentation required</p> <p>If the Phase I ESA identifies a REC and/or if recommended in the Phase I ESA, a Phase II ESA shall also be reviewed for approval</p> <p>If Phase II indicates the need for remediation submit remediation plan to DBS and regulatory agency/agencies as appropriate. Submit agency sign off on remediation plan to DBS. Documentation of completion of</p>

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<ul style="list-style-type: none"> Located on or within 500 feet of a Hazardous Materials site designated as a RCRA Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or Located on an Oil Drilling District or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by CalGEM (refer to https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx); or Located on any land currently or previously designated with an industrial use class or industrial zoning; or Located on land currently or previously used for a gas station or dry-cleaning facility. <p>Or:</p> <ul style="list-style-type: none"> The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station, or dry-cleaner, or otherwise is contaminated with hazardous substances. <p>And:</p> <ul style="list-style-type: none"> The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or conditions. <p>(2) A Phase I Environmental Site Assessment (ESA) shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials.</p> <p>If the Phase I ESA identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I ESA, a Phase II ESA shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II ESAs shall be maintained by the Applicant and Owner and made available for review and inclusion in the case file, as applicable, by the appropriate regulatory agency, such as the SWRCB, DTSC, or LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II ESA or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any</p>			<p>remediation shall be submitted to the DBS</p> <p>If oversight or approval by a regulatory agency is not required, review and approve the verification of compliance with and completion of the remediation plan</p> <p>If needed, verify that a No Further Action letter is submitted to LADBS</p>

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permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained by the Applicant and Owner.			
4.7-2b Site Remediation and Health and Safety Plan			
<p>For discretionary projects that require site remediation under MM-HAZ 4.7-2a, if contaminants of concern (COCs) are detected above regulatory action levels, the project applicant shall retain a qualified environmental consultant to prepare a Soil Management Plan (SMP). If the project is under regulatory oversight, the SMP shall be submitted to appropriate agencies (such as SCAQMD, DTSC or others) for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during excavation and grading activities associated with the project to ensure that contaminated soils are properly identified, excavated, and disposed of off-site, as follows:</p> <ul style="list-style-type: none"> The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. The SMP shall require the timely testing and sampling of soils so that contaminated soils can be separated from inert soils for proper disposal. The SMP shall specify the testing parameters and sampling frequency. During excavation, Rule 1166 requires that soils identified as contaminated shall be sprayed with water or another approved vapor suppressant or covered with sheeting during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Under Rule 1166, contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. During the project's excavation phase, the applicant shall remove and properly dispose of impacted materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan, prior to its transfer for treatment and/or 	Applicant for individual project	DCP, LADBS	<p>Prior to issuance of grading permit: review and approve the Soil Management Plan; if applicable, verification that appropriate regulatory agency has determined that further remedial action is not required</p> <p>Prior to issuance of building permit: review and approve the Health and Safety plan</p>

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<p>disposal. All impacted soils would be properly treated and disposed of in accordance with SCAQMD Rule 1166.</p> <ul style="list-style-type: none"> The project applicant shall commission a site-specific Health and Safety Plan (HASP) to be prepared in compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards (29 Code of Federal Regulations 1910.120) and Cal-OSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review by the Department of Building and Safety. The HASP shall address, as appropriate, safety requirements that will serve to avoid significant impacts or risks to workers or the public. The HASP shall include emergency contact numbers, maps to the nearest hospital, gas monitoring action levels, gas response actions, allowable worker exposure times, and mandatory personal protective equipment requirements. The HASP shall be signed by all workers involved in the activities associated with the investigation to demonstrate their understanding of the risks of excavation. <p>If remediation is determined to be necessary, the grading permit shall not be issued until the applicable regulatory agency has indicated that further remedial action is not required.</p>			
Hydrology and Water Quality			
4.8-1 Drainage Pattern Alterations and Flood Control			
<p>For any development project that the City has determined based on an expert study will impede or redirect flood flows even with compliance with existing regulations and RCMS, the project shall develop and implement a project-specific Stormwater Pollution Prevention Plan (SWPPP) for compliance with the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. The purpose of the SWMP, similar to the SWPPP, is to maintain during construction and operations the existing drainage patterns of the site and vicinity to the maximum extent feasible, to avoid downstream impacts associated with flooding or water quality degradation from ground disturbance during construction. To address the potential for long-term drainage pattern alterations associated with the placement of future development projects in areas where no development is currently present, the SWMP must also include operational and maintenance BMPs; such BMPs may include but would not be limited to the upkeep of</p>	Applicant for individual projects	DCP, DPW	Prior to issuance of grading permit: review and approve the project specific Stormwater Pollution Prevention Plan

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landscaped/vegetated swales to dissipate stormwater runoff, or the maintenance (dredging and disposal of accumulated materials) of detention basins placed to capture stormwater runoff resulting from the project.			
Noise			
4.10-1(a) Noise Shielding and Silencing			
For all discretionary projects, power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the Project Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. Measure shall be shown on plans.	Applicant for individual projects	DCP, LADBS	<p>Prior to project approval: condition project to comply with measures and to provide necessary assurances to ensure compliance</p> <p>Prior to building permits (including grading, demolition): ensure that requirement shows on plans and necessary assurances are obtained</p> <p>During construction: field verify that power construction equipment includes noise shielding and silencing devices</p>
4.10-1(b) Use of Driven Pile Systems			
For all discretionary projects, driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report. Requirement shall show on plans.	Applicant of individual project	DCP, LADBS	<p>Prior to grading permits: ensure that requirement shows on plans and necessary assurances have been obtained.</p> <p>During construction: field verify that driven, sonic or vibratory pile drivers are avoided</p>

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4.10-1(c) Enclosures and Screening			
For all discretionary projects, all outdoor mechanical equipment shall be enclosed or screened from off-site noise-sensitive uses. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment and off-site noise-sensitive uses.	Applicant of individual project	DCP, LADBS	<p>Prior to project approval: condition project to comply with measures</p> <p>Prior to building permits: ensure mechanical equipment is enclosed or screened</p> <p>During construction: field verify that all outdoor mechanical equipment are screened or enclosed</p>
4.10-1(d) Construction Staging Areas			
Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. Requirement shall show on plans.	Applicant of individual project	DCP, LADBS	<p>Prior to project approval: condition project to comply with measures and to provide necessary assurances to ensure compliance</p> <p>Prior to building permits (including grading, demolition): ensure that requirement shows on plans and necessary assurances are obtained</p> <p>During construction: field verify that construction staging areas are located far from noise sensitive uses when possible and feasible.</p>

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4.10-1(e) Temporary Sound Barriers			
Sound barriers, such as temporary walls or sound blankets, shall be erected between construction activities and noise-sensitive uses when construction activities are located within a line-of-sight to and within 500 feet of noise-sensitive uses. Requirement shall show on plans.	Applicant of individual project	DCP, LADBS	<p>Prior to project approval: condition project to comply with measures and to provide necessary assurances to ensure compliance</p> <p>Prior to building permits (including grading, demolition): ensure that requirement shows on plans and necessary assurances are obtained</p> <p>During construction: field verify that sound barriers between construction activities and noise-sensitive uses are provided</p>
4.10-1(f) Project-Specific Construction Noise Study			
<p>A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for discretionary projects in the City located within 500 feet of noise-sensitive land uses and that have one or more of the following characteristics:</p> <ul style="list-style-type: none"> • Two or more subterranean levels or 20,000 cubic yards or more of excavated material; • Construction duration (excluding architectural coatings) of 18 months or more; • Use of large, heavy-duty equipment rated 300 horsepower or greater; or • The potential for impact pile driving. <p>The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (e.g., residences, transient lodgings, schools, libraries, churches [or other places of assembly], hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks), and identify measures to reduce noise exposure. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or</p>	Applicant of individual project	DCP, LADBS	<p>Prior to project approval: review and approve the Construction Noise Study identifying any required mitigation; condition project to comply with noise reduction measures in the Study and provide necessary assurances to ensure compliance</p> <p>Prior to issuance of building permit: obtain necessary assurances for compliance with noise reducing measures</p> <p>During construction: field verify that compliance with mitigation</p>

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<p>durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques may include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.</p> <p>Project Applicants shall be required to comply with all requirements of Mitigation Measures 4.10-1(a) through 4.10-5(e) in addition to any additional requirements identified and recommended by the Construction Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.</p>			plan from Construction Noise Study
4.10-2 Project-Specific Operational Noise Study			
<p>A Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for all discretionary housing developments with roof decks and/or pool decks in the City of Los Angeles concurrent with Design Review and prior to the approval of building permits. The Noise Study shall include:</p> <ul style="list-style-type: none"> • Description of pertinent noise regulations. • Analysis of operational noise generated by the project's roof decks and/or pool decks to noise-sensitive land uses. • Comparison of noise levels to applicable City thresholds, such as if the project's operational noise would exceed 3 dBA in an unacceptable land use category or 5 dBA in an acceptable land use category per the City's land use compatibility guidelines included in the City of Los Angeles General Plan Noise Element. • If project noise would exceed City thresholds, identification of mitigation measures to reduce noise to below 3dBA in an unacceptable land use category or 5 dBA in an acceptable land use category to the extent feasible. Mitigation measures may include, but would not be limited to, operational restrictions, sound dampening equipment, or sound walls. • Each mitigation measure in the Noise Study shall identify anticipated noise reductions at noise-sensitive land uses. 	Applicant of individual project	DCP, LADBS	<p>Prior to project approval; review and approve the Noise Study, condition compliance with any mitigation measures and providing necessary assurances to ensure compliance</p> <p>Prior to building permits: ensure mitigation measures are on plans and obtain necessary assurances</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<ul style="list-style-type: none"> Applicant/owners shall comply with the mitigation plan and include the measures in construction contracts. Mitigation plan shall be included on plans. 			
4.10-3(a) Vibration Control Plan			
<p>For construction activity for discretionary projects involving vibratory rollers or sonic pile drivers within 50 feet of an extremely fragile building (non-engineered masonry) or historical resource (designated or in SurveyLA or other City recognized survey), the Applicant shall prepare a Vibration Control Plan. The Vibration Control Plan requirement shall also apply to use of impact pile drivers within 140 feet of extremely fragile buildings or historical resources or residential structures. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to:</p> <ul style="list-style-type: none"> Use of drilled piles or similar method rather than impact pile driving Use of rubber-tired equipment rather than metal-tracked equipment Avoiding the use of vibrating equipment when allowed by best engineering practices <p>The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected extremely fragile buildings/historical resources. The survey letter shall provide a shoring design to protect the extremely fragile buildings/historical resources from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the Contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).</p> <p>A Statement of Compliance, in a form approved by the City, committing the Applicant and Owner to complying with the measure shall be signed by the Applicant and Owner is required to be submitted to the Los Angeles Department of Building and Safety (LADBS) at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above shall be documented by a qualified structural engineer, and</p>	Applicant of individual project	DCP, LADBS	<p>Prior to project approval or grading permit: review and approve Vibration Control Plan or condition project to prepare Vibration Control Plan and provide necessary assurances to ensure compliance</p> <p>Prior to issuance of grading permit: review and approve the Vibration Control Plan and/or obtain necessary assurances; Vibration Control Plan showing on the plans</p> <p>During construction; monitoring</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
shall be provided to the City upon request. Vibration Control Plan shall show on the plans.			
4.10-3(b) Vibration Mitigation			
<p>For all discretionary projects:</p> <ul style="list-style-type: none"> Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or similar methods are alternatives that shall be utilized where geological conditions permit their use. Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. <p>The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices.</p> <p>Requirement to be on plans.</p>	Applicant of individual project	DCP, LADBS	<p>Prior to project approval: condition project to comply with measures and to provide necessary assurances to ensure compliance</p> <p>Prior to building permits (including grading, demolition): ensure that requirement shows on plans and necessary assurances are obtained</p> <p>During construction: verify that vibrating equipment is avoided</p>
Public Services			
4.12-1(a) Design Plans Review			
<p>For discretionary projects with more than 300 housing units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, prior to the start of construction, design plans shall be submitted to the LAFD that demonstrate the use of construction and design features that reduce fire potential and/or promote containment, including increased spacing between buildings, noncombustible roofs, fire-resistant landscaping, and special irrigation facilities. Design features shall be reviewed and approved by the LAFD prior to project approval.</p> <p>Upon completion of project construction, a diagram of each portion of the property, including access routes and any additional information that might facilitate fire and emergency medical response, shall be submitted to the LAFD.</p>	Applicant of individual project	DCP, LAFD	<p>Prior to project approval: condition project to submit design plans to LAFD; condition project to provide necessary assurances to ensure compliance</p> <p>Prior to issuance of building permit: review and approve design plans; obtain necessary assurances</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.12-1(b) Emergency Access			
<p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, during demolition and construction of discretionary projects, access roads and alleyways shall remain clear and unobstructed in order to ensure access for emergency vehicles. If road closures during construction are necessary, prior to the issuance of a building permit for the discretionary project, a detailed Construction Management Plan including street closure information, a detour plan, haul routes, and a staging plan, shall be prepared and submitted to the Los Angeles Fire Department and the Los Angeles Department of Transportation for review and approval.</p> <p>Furthermore, if emergency access gates are provided on a project access road, the gates shall be equipped with approved locking devices for both Los Angeles City and County Fire Departments on both sides of the gate. Signs shall be provided on the project access road.</p>	Applicant of individual project	DCP, LAFD, Los Angeles Department of Transportation (LADOT)	<p>Prior to project approval: review and approve Construction Management Plan or condition project to provide Construction Management Plan; condition project to provide necessary assurances.</p> <p>Prior to issuance of building permit: review and approve the Construction Management Plan with construction road closure details; obtain necessary assurances</p>
4.12-1(c) Hillside Fire/Vegetation Management Plan			
<p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, projects shall have a 200-foot minimum Fuel Management Zone in place, and it shall be cleared annually, around each structure on the project site. A Fire/Vegetation Management Plan for the Fuel Management Zone shall be prepared that requires the following: all-natural vegetation will be thinned out by 70 percent and all dead vegetation, including grass will be maintained at less than four inches in height; if the zone is not irrigated, the area may be covered with chipped biomass four inches deep; no tree limb shall be within 10 feet of a chimney, including outdoor barbeques; trees must be maintained free of dead branches; trees must be limbed up four feet or 1/3 the height of the tree; trees over driveways or roads must be limbed up to 15 feet; the shrub height limit is two feet.</p>	Applicant of individual project	DCP, LAFD	<p>Prior to project approval: approve Fire/Vegetation Management Plan or condition project to provide Fire/Vegetation Management Plan and provide necessary assurances to ensure compliance</p> <p>Prior to issuance of building permit: review and approve the Fire/Vegetation Management Plan; obtain necessary assurances</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<p>Furthermore, the following requirements shall be included in the Fire/Vegetation Management Plan. The following shrubs and trees are highly flammable and shall not be planted on or around the project site:</p> <ul style="list-style-type: none"> • Sage species (<i>Salvia</i> spp.) • Pampas grass (<i>Cortaderia</i> spp.) • Cypress (<i>Cupressus</i> spp.) • Eucalyptus (<i>Eucalyptus</i> spp.) • Juniper (<i>Juniperus</i> spp.) • Pine (<i>Pinus</i> spp.) • Cedar (<i>Cedrus</i> spp.) <p>The following shrubs and trees shall be used for general landscaping to reduce fire hazard associated with flammable vegetation:</p> <ul style="list-style-type: none"> • Coastal live oak (<i>Quercus</i> spp.) • California sycamore (<i>Platanus racemosa</i>) • Cottonwood (<i>Populus fremontii</i>) • Willow (<i>Salix</i> spp.) • Mulefat (<i>Baccharis salicifolia</i>) • California bay (<i>Umbellularia californica</i>) • California black walnut (<i>Juglans californica</i>) • Liquidambar (<i>Liquidambar styraciflua</i>) • California lilac (<i>Ceanothus</i> spp.) • Toyon (<i>Heteromeles arbutifolia</i>) • Mountain mahogany (<i>Cercocarpus betuloides</i>) • Holly leaf cherry (<i>Prunus ilicifolia</i>) • Dwarf periwinkle (<i>Vinca minor</i>) • Grass (<i>Stipa</i> spp.) <p>The Fire/Vegetation Management Plan shall be reviewed and approved by the City of Los Angeles Fire Department prior to project approval.</p>			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.12-1(d) Submittal of Plot Plan			
<p>For discretionary projects with more than 300 units or located in VHFHSZ or SRA areas and where LAFD finds it necessary on the basis that existing regulations are not adequate to avoid risk of fire based on unusual site-specific, area, roadway or project characteristics, submittal of a plot plan for approval by the LAFD shall be required. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. In addition, the following recommendations by the LAFD relative to fire safety may be incorporated into the building plans:</p> <ul style="list-style-type: none"> • Access for Fire Department apparatus and personnel to and into all structures shall be required. • The entrance to a residence lobby must be within 50 feet of the desired street address curb face. • Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units. • The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. • The Fire Department may require additional vehicular access where buildings exceed 28 feet in height. • Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but, in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof. • Entrance to the main lobby shall be located off the address side of the building. 	Applicant of individual project	DCP, LAFD, LADBS	<p>Prior to project approval: require plot plan to be submitted to LAFD</p> <p>Prior to building permit: review and approve the plot plan</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<ul style="list-style-type: none"> Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet of the visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department. Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky. Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required. Submit plot plans indicating access road and turning area for Fire Department approval. Adequate public and private fire hydrants shall be required. Standard cut-corners will be used on all turns. Any roof elevation changes in excess of three feet may require the installation of ships ladders. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access. All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued. Plans showing areas to be posted and/or painted "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off. Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety 			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<p>communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.</p> <ul style="list-style-type: none"> • Helicopter landing facilities are required on all high-rise buildings in the City in accordance with the recently revised Fire Protection Bureau Requirement 10. • Each standpipe in a new high-rise building shall be provided with two remotely located fire department connections (FDCs) for each zone in compliance with NFPA 14-2013, Section 7.12.2. 			
4.12-2(a) Crime Prevention Unit Consultation			
<p>For a discretionary project with more than 300 units or on a project site of more than 10 acres, the project applicant shall consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the project, including applicable features in the Los Angeles Police Department's Design Out Crime Guidelines. The crime prevention features recommended by the Los Angeles Police Department's Crime Prevention Unit and agreed to by the project applicant during consultation shall be made part of the project. The plans shall incorporate the design guidelines relative to security, semipublic and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. These measures shall be approved by the Police Department prior to the issuance of building permits.</p>	Applicant of individual project	LADBS, Los Angeles Police Department (LAPD)	<p>Prior to project approval: require applicant to consult with police department and condition project to comply with crime prevention features recommended by LAPD; or condition project applicant to consult with LAPD prior to building permits and provide necessary assurances to ensure compliance</p> <p>Prior to issuance of building permit: review project and provide consultation for crime prevention measures; obtain assurances</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.12-2(b) Security During Construction			
<p>During construction of discretionary projects with more than 300 units or with more than 10 acres, private security personnel shall monitor vehicle and pedestrian access to the construction areas and patrol the project site, construction fencing with gated and locked entry shall be installed around the perimeter of the construction site, and security lighting shall be provided in and around the construction site.</p> <p>Furthermore, temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. Low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) shall be provided to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the contractor shall document the security measures; and the documentation shall be made available to the construction monitor.</p>	Applicant of individual project	DCP, LADBS	<p>Prior to project approval: condition project to comply with measure and provide necessary assurances to ensure compliance</p> <p>Prior to building permit: obtain necessary assurances</p> <p>During construction: review and approve documentation of security measures to construction monitor</p>
Transportation			
4.14-1 Construction Management Plan			
<p>Any discretionary project that LADOT determines will have potential impacts to the circulation system even with application of existing regulatory compliance measures, shall prepare a detailed Construction Management Plan (CMP), including street closure information, detour plans, haul routes, and staging plans shall be prepared and submitted to LADOT for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include those elements required by LADOT for the project, which may include but are not limited to the following:</p> <ul style="list-style-type: none"> • Providing for temporary traffic control during all construction activities adjacent to public right of way to improve traffic flow on public roadways (e.g., flag men) • Prohibition of construction worker parking on any adjacent residential streets 	Applicant of individual project	DCP; LADOT; LADBS	<p>Prior to project approval: review and approve construction management plan or condition project to provide construction management plan and provide necessary assurances to ensure compliance</p> <p>Prior to issuance of building permit: review and approve Construction Management Plan; obtain necessary assurances</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<ul style="list-style-type: none"> • Encouragement of carpool/vanpool of workers • Prohibitions on construction-related vehicles parking on surrounding public streets • Prohibitions on construction equipment or material deliveries within the public right-of-way • Accommodation of all equipment on site as feasible • Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag men) • Scheduling of construction activities, including deliveries, to reduce the effect on peak hour traffic flow on surrounding arterial streets • Rerouting of construction trucks to reduce travel on congested streets to the extent feasible • Provisions of safety precautions for pedestrians and bicyclists through alternate routing and protection barriers and signage • Provisions to accommodate the staging and storage of equipment • Scheduling of construction-related deliveries to reduce travel during commuter peak hours • Obtain necessary permits for any truck hauling from the City prior to issuance of any permit for the project. • Noticing and coordination with any nearby schools that may be affected by construction activities, including deliveries, hauling and other construction transportation, to ensure safety of school children. • Ensuring all feasible safety measures are taken to accommodate safe travel of pedestrian, bicyclists, and other users of the sidewalks around the construction site, including but not limited through the following measures: <ul style="list-style-type: none"> • Construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. • Maintaining adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. 			

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<ul style="list-style-type: none"> Providing temporary pedestrian facilities adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. Keeping sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Reopening the sidewalk as soon as reasonably feasible taking construction and construction staging into account. 			
4.14-2 Transportation Demand Management Program			
<p>If a discretionary project will have significant impacts to VMT under LADOT Transportation Assessment Guidelines, the Applicant shall prepare a TDM program to reduce VMT impacts below the City's project threshold to the extent feasible. TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy. TDM measures shall include but not be limited to the following examples:</p> <p>TDM strategies applicable for the residential component:</p> <p>Unbundled Parking—Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making.</p> <p>TDM strategies applicable if the project includes an office component:</p> <p>Required Commute Trip Reduction Program—This strategy involves the development of an employee-focused travel behavior change program that targets individual attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. The program typically includes elements such as a coordinated ride-sharing or carpooling program, vanpool program, alternative work</p>	Applicant of individual project	LADOT, DCP, LADBS	<p>Prior to project approval: condition project to provide a TDM plan and provide necessary assurances to ensure compliance</p> <p>Prior to building permit: obtain necessary assurances</p> <p>During construction: review and approve the TDM plan</p> <p>Prior to issuance of Certificate of Occupancy: review and approve final TDM plan</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<p>schedule program, preferential carpool parking, guaranteed ride home service, and a program coordinator. The program requires the development of metrics to evaluate success, program monitoring, and regular reporting.</p> <p>TDM strategies applicable for both the office and residential components:</p> <p>Promotions and Marketing—This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. It can also include more active promotional strategies such as gamification.</p>			
Tribal Cultural Resources			
4.15-1(a) Native American Consultation and Monitoring for Discretionary Projects			
<p>All discretionary projects that involve ground disturbing activities in previously undisturbed soils, shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area.</p> <p>Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. Should projects have potential to impact cultural resources, as determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMP shall include compliance with 4.15-1(b) and will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.</p>	Applicant of individual project	DCP, LADBS	<p>Prior to project approval: review and approve cultural resource assessment report and verify that notification to applicable tribes is provided; if potential impact to cultural resources, review and approve the Cultural Resources Monitoring program; condition project to comply with monitoring program and to provide adequate assurances to ensure compliance</p> <p>During ground disturbing activities: monitor</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
4.15-1(b) Discovery of Potential Tribal Cultural Resources			
<p>In the event that Tribal Cultural Resources are discovered during Project activities, whether or not a tribal monitor is present, and there is no CRMP or the CRMP does not cover treatment of inadvertent discovery, all work within a 50-foot buffer of the find shall cease and a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall assess the find. Tribes that are culturally and historically affiliated with the Project area and have requested consultation shall be notified, should any potential tribal cultural resource be discovered during project implementation. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Unless agreed otherwise during the tribal consultation process or in a CRMP, if tribal cultural resources are discovered during construction, the applicant and/or owner shall retain a Qualified Tribal Monitor (as approved by the Tribe) if requested by the Tribe. Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, and monitoring reports) should be provided to consulting Tribes. Any tribal cultural resources discovered shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative and in accordance with federal, state, and local guidelines. If not otherwise provided in the CRMP, the Lead Agency and/or applicant shall, in good faith, provide all consulting Tribes the opportunity to consult on the disposition and treatment of resources. The location of the find of tribal cultural resources and the type and nature of the find will not be published, except to provide information to the Qualified Archaeologist, tribal representatives, and public agencies with jurisdiction or responsibilities related to the resources. An agreement will be reached with the Tribal Representative to mitigate or avoid any significant impacts to identified tribal cultural resources. Absent an agreement with the Tribal Representative, as provided in Public Resources Code Section 21083.2, the find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur until testing or studies prepared by a Qualified Archaeologist have adequately documented the recovery of scientifically consequential information from and about the resource. Construction activity may continue unimpeded on other portions of the project site if cleared by the Qualified Tribal Monitor or Qualified Archaeologist. Ground Disturbance Activities in the area where resources were found may commence once the identified</p>	Applicant for individual project	DCP, LADBS	<p>Prior to project approval: condition project to comply with measure and provide assurance to ensure compliance</p> <p>Prior to building permit: obtain necessary assurances: ensure measure shown on plans</p> <p>During project activities: if resources are found, field verify that all work within a 50-foot buffer is ceased; verify that affiliated tribal representatives are notified; verify that the identified resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
resources are properly assessed and processed by a Tribal Representative or, if no Tribal Representative is identified, a Qualified Archaeologist. The measure shall be shown on plans.			
Wildfire			
4.17-1 Hillside Construction Staging and Parking Plan			
<p>For discretionary projects for development located in or adjacent to an SRA or VHFHSZ, where LAFD finds it necessary to add additional conditions above existing regulations to reduce the risk of construction-related activities impairing an emergency response plan or emergency evacuation plan, prior to the issuance of a grading or building permit, the applicant shall submit a Construction Staging and Parking Plan to the Department of Building and Safety and the Fire Department for review and approval. The plan shall identify where all construction materials, equipment, and vehicles will be stored through the construction phase of the project, as well as where contractor, subcontractor, and laborers will park their vehicles so as to prevent blockage of two-way traffic on streets in the vicinity of the construction site. The Construction Staging and Parking Plan shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • No construction equipment or material shall be permitted to be stored within the public right-of-way. • If the property fronts on a designated Red Flag Street, on noticed "Red Flag" days, all workers shall be shuttled from an off-site area, located on a non-Red Flag Street, to and from the site in order to keep roads open on Red Flag days. • During the Excavation and Grading phases, only one truck hauler shall be allowed on the site at any one time. The drivers shall be required to follow the designated travel plan or approved Haul Route. • Truck traffic directed to the project site for the purpose of delivering materials, construction-machinery, or removal of graded soil shall be limited to off-peak traffic hours, Monday through Friday only. No truck deliveries shall be permitted on Saturdays or Sundays. 	Applicant for individual project	LADBS, LAFD	<p>Prior to project approval: approve Construction Staging and Parking Plan or condition project to provide a Construction Staging and Parking Plan and to provide necessary assurances to ensure compliance</p> <p>Prior to issuance of grading or building permit: review and approve the Construction Staging and Parking Plan, obtain necessary assurances</p>

Mitigation Measure/Condition of Approval	Implementing Party	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions ¹
<ul style="list-style-type: none"> All deliveries during construction shall be coordinated so that only one vendor/delivery vehicle is at the site at one time, and that a construction supervisor is present at such time. A radio operator shall be on-site to coordinate the movement of material and personnel, in order to keep the roads open for emergency vehicles, their apparatus, and neighbors. During all phases of construction, all construction vehicle parking and queuing related to the project shall be as required to the satisfaction of the Department of Building and Safety, and in substantial compliance with the Construction Staging and Parking Plan, except as may be modified by the Department of Building and Safety or the Fire Department. 			
4.17-3 Undergrounding of Power Lines in and Near an SRA and VHFHSZs			
For all discretionary applications for development located in or within one mile of an SRA or VHFHSZs, that involve or require the installation of new power lines shall be required to install the new power line underground. Prior to the issuance of a grading or building permit, the applicant shall submit plans for undergrounding of power lines.	Applicant for individual project	DCP, LADBS, LADWP	<p>Prior to project approval: condition project to comply and obtain necessary assurances to ensure compliance</p> <p>Prior to issuance of a grading or building permit: review and approve plans for undergrounding power lines; obtain necessary assurances</p>

Appendix B

Transportation Impacts Memorandum

Memorandum

Date: Updated September 13, 2024
To: Rincon Consultants, City of Los Angeles Department of City Planning
From: Fehr & Peers
Subject: **LA Housing Element Rezoning Transportation Impacts**

LA24-3535

The City of Los Angeles Citywide Housing Element 2021-2029 Update and Safety Element Update ("Housing Element EIR") is currently in the process of receiving an Addendum to evaluate the environmental effects of the targeted code amendments associated with the Housing Element Rezoning Program ("Proposed Project"). The purpose of this memorandum is to convey whether the results of impact assessment on transportation in the Housing Element EIR would be expected to change with the Proposed Project.

Housing Element EIR Transportation Impacts

The original transportation analysis involved in the Housing Element EIR included the following assessments of impacts and results:

- Threshold 4.14-1:
 - Threshold: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.
 - Impact conclusion: Less than significant with mitigation.
- Threshold 4.14-2:
 - Threshold: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).; or more specifically:
 - The Proposed Project would result in average total VMT per service population in the plan horizon year that exceeds 15% below the regional average total VMT per service population from the most recent regional metric available.
 - The Proposed Project would result in average total VMT per service population in the plan horizon year that exceeds the average total VMT per service population for the "project area" for the baseline year.



- Impact conclusion: Less than significant.
- Threshold 4.14-3:
 - Threshold: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
 - Impact conclusion: The impact related to construction is less than significant with mitigation. Impacts related to highway safety as a result of design features or incompatible uses would be significant and unavoidable.
- Threshold 4.14-4:
 - Threshold: Result in inadequate emergency access.
 - Impact conclusion: Less than significant with mitigation.

Proposed Project Expected Transportation Impacts

The Proposed Project involves the inclusion of the following code amendments:

- The Citywide Housing Incentive Program Ordinance substantially revising the City's State Density Bonus Law implementation program, creating a new Mixed Income Incentive Program, and establishing a new Affordable Housing Incentive Program;
- An expansion to the City's existing Adaptive Reuse Ordinance;
- Housing Element Sites and Minimum Density Ordinance; and
- A Resident Protections Ordinance

With these amendments, the Proposed Project seeks to incentivize density in geographic areas that are adjacent to and characteristically similar to areas that are already zoned for dense use. The Proposed Project does not add new housing, but rather redistributes the housing assumptions within the same transportation analysis zones (TAZs) that were used in the Housing Element EIR analysis (based on results from the City of Los Angeles Travel Demand Forecasting model).

These changes outlined in the Proposed Project are not anticipated to result in different transportation impact results. A discussion of some specific aspects follows:

- Threshold 4.14-1:
 - The Proposed Project further aligns with the Programs contained in the Housing Element including policy proposals to build on the City's existing incentive-based tools to promote housing development. Furthermore, the Proposed Project is consistent with State law changes to expand project streamlining opportunities and requirements for sites identified for lower income households. As there is no change to the circulation system assumptions, the impact conclusions from the Housing Element EIR would remain the same.
- Threshold 4.14-2:

Exhibit C.1- ADDENDUM TO THE HOUSING ELEMENT EIR

LA Housing Element Rezoning Transportation Impacts

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- The Proposed Project seeks to prevent low densities through minimum density requirements in specific Higher Opportunity Areas than the Housing Element originally planned. VMT per service population would likely not change or may slightly improve by condensing the housing assumptions into these more streamlined locations. With no increase in the total number of units and marginally increased housing density, the impact conclusions from the Housing Element EIR would remain the same.
- Threshold 4.14-3:
 - The Housing Element EIR notes that the impact related to construction would be less than significant with mitigation because while not the majority, larger projects or projects with unique site conditions or attributes may result in potential impacts from construction activities. The Housing Element EIR also notes that impacts related to highway safety as a result of design features or incompatible uses would be significant and unavoidable because build out of the RHNA may contribute to queuing on off-ramps that lead to unsafe speed differentials. While the Proposed Project does impose minimum development standards in some areas which could result in some larger projects or those with unique site conditions, there is no change to the assumptions of total number of units within a given TAZ or to the RHNA build out totals. As such, the impact conclusions from the Housing Element EIR would remain the same.
- Threshold 4.14-4:
 - The Proposed Project increases the density possible on select Higher Opportunity Areas that are within Very High Fire Hazard Severity Zones (VHFHSZs), where evacuation and emergency services may be necessary in the event of a fire. However, the specific parcels included in the Proposed Project are along major streets on edges of mountainous areas with access to the main street grid, and adjacent to parcels that allowed for higher density in the original Housing Element EIR, making the density of parcels along the same major street more similar in nature to one another. The Proposed Project is not expected to increase housing density in areas that would be more difficult for emergency services to access, nor does it increase the total amount of housing significantly. Additionally, LAFD provides many informational resources regarding fire and emergency preparedness; visit <http://www.lafd.org/faqs>. In the Housing Element EIR, the primary focus of this impact discussion was related to construction management planning, and the reasoning would apply to the Proposed Project as well. Given the same assumptions about construction management plans and LAFD response times and practices, the impact conclusions from the Housing Element EIR would remain the same.