

EXHIBIT C:
Addendum to Housing Element Environmental Impact Report
(SCH No. 2021010130)

CPC-2022-2698-GPA, ENV-2020-6762-EIR-ADD1

For consideration by the City Planning Commission

May 19, 2022

Targeted Amendments to the 2021-2029 Housing Element
City of Los Angeles

ENV-2020-6762-EIR-ADD1

Addendum to the Final Environmental Impact Report
prepared for the Citywide Housing Element 2021-2029 and Safety Element Update
SCH No. 2021010130

May 2022

1. INTRODUCTION

1.1 Introduction / Purpose of this Addendum

The purpose of this this Addendum to the Environmental Impact Report (EIR) prepared for the Citywide Housing Element 2021-2029 and Safety Element Update (“Housing Element EIR”) is to evaluate the environmental effects associated with the proposed targeted amendments to the Housing Element (“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. The Housing Element EIR was prepared to examine the potential environmental effects of the 2021-2029 Housing Element Update, including build out of the RHNA, as well as the programs and policies that have the potential to result in physical environmental effects, and the Inventory of Sites and Rezoning Program needed to demonstrate zoned capacity needed to accommodate the City’s RHNA Allocation.

As indicated in *Section 2*, the Proposed Project is a targeted amendment to the Housing Element, which includes targeted revisions to implementation programs in order to provide more detailed metrics, timeframes, and place-based strategies in lower-income areas of the city as part of the affirmatively furthering fair housing (AFFH) requirement. These AFFH amendments were identified as needed by the California Department of Housing and Community Development (HCD) in order to ensure the Housing Element’s substantial compliance with state housing element laws and requirements. In addition, the project includes minor technical corrections. This includes corrections of typographical and formatting errors, including but not limited to accrediting staff, adding references to the amendment case number and adoption dates, and revisions to Appendix 4.1.

The purpose of this Addendum is therefore to evaluate the Proposed Project consistent with CEQA Guidelines Section 15164 and 15162, and determine whether the Proposed Project results in a change to the project or circumstances which will require a major revision to the Housing Element EIR due to the involvement of any new significant impacts or a substantial increase in the severity of a previously identified significant effect.

1.2 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; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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.

1.3 Incorporation by Reference

The following document was used in the preparation of this Addendum, and is incorporated herein by reference, consistent with Section 15150 of the Guidelines: Citywide Housing Element

2021-2029 and Safety Element Update, Final Environmental Impact Report (SCH No. 2021010130), certified November 24, 2021. Referred to herein as the Housing Element EIR.

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

- 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>

1.4 Summary of Effects

Section 3 of this Addendum includes a detailed evaluation of environmental effects associated with the Proposed Project, as they relate to impacts identified in the Housing Element EIR.

The Proposed Project consists of targeted amendments that largely would not result in a change to the project or circumstances. Inasmuch as the amendments would reflect a change to the project that was analyzed in the Housing Element EIR, the analysis shows that these changes would not result in a change to the EIR. Therefore, as analyzed in more detail below, the Proposed Project would not result in 1) substantial changes that require major revisions to the Housing Element EIR; 2) substantial changes to circumstances, related to significant effects, that require major revisions to the Housing Element EIR; 3) new information of substantial importance regarding worsened significant effects, mitigation measures or alternatives now found to be feasible; or new mitigation measures or alternatives which are considerably different from those analyzed in the Housing Element EIR. Therefore, the Proposed Project does not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the CEQA Guidelines, and therefore an Addendum to the Housing Element EIR is the appropriate document to address the Proposed Project.

2. DESCRIPTION OF PROPOSED PROJECT

2.1 Background on the 2021-2029 Housing Element Update and the Housing Element EIR

On November 24, 2021 the Los Angeles City Council certified the Environmental Impact Report (EIR) prepared for the Citywide Housing Element 2021-2029 and Safety Element Update, SCH No. 2021010130 ("Housing Element EIR") and adopted the updates to the Housing Element and Safety Element. Following adoption, the City submitted the 2021-2029 Housing Element Update to HCD for compliance review and certification.

On February 22, 2022, the City of Los Angeles received a letter from HCD reporting the results of its review of the City's 2021-2029 Housing Element Update. While the letter acknowledged the City's Housing Element met almost all of the statutory requirements of state housing

element law, it directed the City to make additional revisions in order to gain a finding of substantial compliance by HCD.

In particular, the HCD letter cited two related deficiencies with regard to statutory AFFH requirements. First, housing element programs, strategies and actions designed to meet local AFFH goals must include metrics and milestones, pursuant to Government Code Section 65583(c)(10)(A). The purpose of metrics and milestones is to determine what beneficial fair housing results will be achieved during the eight-year housing element cycle and to better allow HCD to evaluate the effectiveness and progress of local implementation actions. Secondly, HCD found that the 2021-2029 Housing Element Update's AFFH programs did not sufficiently address targeting of geographic areas or neighborhoods and the need to include additional place-based strategies to encourage community revitalization.

Revisions were identified as necessary to correct these deficiencies in order for the 2021-2029 Housing Element to be fully compliant with all regulations in state housing element law.

Housing Element EIR

The Housing Element EIR was prepared to examine the potential environmental effects of the Safety Element and the 2021-2029 Housing Element Update, including the programs and policies that have the potential to result in physical environmental effects, and the Inventory of Sites and Rezoning Program needed to demonstrate zoned capacity needed to accommodate the City's RHNA Allocation.

Based on the analysis contained in the Housing Element EIR, the EIR found that the 2021-2029 Housing Element Update would result in unavoidable significant environmental impacts with regard to:

- Air Quality (Exceedance of Criteria Pollutants—Construction and Operations)
- Biological Resources (Special Status Species, Sensitive Habitats, Wildlife Corridors)
- Cultural Resources (Historical Resources and Archaeological Resources)
- Geology and Soils (Paleontological Resources)
- Hazards and Hazardous Materials (Hazardous Materials Near Schools and Hazardous Materials Sites)
- Noise (Construction Noise, Operation Noise, and Construction Vibration)
- Public Services (Fire Protection, Police Protection, and School Facilities)
- Recreation (Deterioration of Recreational Facilities and Construction of Recreational Facilities)
- Transportation (Freeway Queuing)
- Tribal Cultural Resources (Construction: Ground Disturbance during Construction)

- Wildfire (Impair Emergency Response Plan, Exacerbate Wildfire Risks in State Responsibility Area or VHFHSZ, Require Infrastructure that may Exacerbate Fire Risk, Expose People or Structures to Significant Risks in State Responsibility Area or VHFHSZ, and Expose People or Structures to Significant Risks Involving Wildland Fires)

The Housing Element EIR also identified the following significant impacts that were anticipated to be reduced to less than significant with identified mitigation measures:

- Air Quality: Construction-related emissions of toxic air contaminants
- Hydrology: Impeding or Redirect Flood Flows
- Transportation: Circulation Plan Consistency, Hazardous Design, Emergency Access

The Housing Element EIR considered two Project Alternatives, including 1) No Project Alternative, and 2) Redistribution of Rezoning Program. The analysis contained the Housing Element EIR found that neither of the studied alternatives would avoid any of the significant and unavoidable impacts of the 2021-2029 Housing Element Update and both would also result in a significant and unavoidable impact related to GHG, land use, and transportation (VMT) that would not occur under the 2021-2029 Housing Element Update.

2.2 Description of Targeted Amendments to the 2021-2029 Housing Element

The Proposed Project consists of a General Plan Amendment to make targeted amendments to the adopted Housing Element, including the modification and addition of implementation programs in Chapter 6 to clarify metrics, milestones, actions, and strategies to affirmatively further fair housing as well as expand place-based programs to encourage community revitalization. As described in *Section 2.1* above, these revisions are identified as necessary to obtain full compliance with statutory requirements. In addition, the Proposed Project includes minor technical corrections to correct formatting and typographical errors.

Modification and Addition of Implementation Programs

The Proposed Project includes the modification to existing implementation programs to include metrics and milestones that target significant and meaningful AFFH outcomes. These amendments include a revised and reorganized AFFH Program 124, as well as targeted edits to individual existing programs that have important AFFH components. In addition, four new implementation programs are proposed to be added to the Housing Element in order to better reflect place-based strategies.¹ These programs reflect activities that are part of the City's existing work programs, but had not previously been included in the Housing Element as they are not explicitly related to housing programs.

The Proposed Project's modifications to existing implementation programs are summarized as follows:

¹ Previously existing programs: 1, 3, 4, 6, 7, 8, 9, 10, 11, 14, 15, 18, 20, 22, 24, 26, 30, 32, 38, 41, 42, 49, 52, 56, 63, 65, 68, 81, 82, 84, 85, 86, 87, 88, 89, 90, 93, 96, 99, 102, 108, 122, 123 and 124; Newly proposed programs: 133, 134, 135 and 136.

- More specific commitments: Within individual programs, language around exploring or considering specific actions is revised to include more specific commitments or actions, such as drafting a code amendment or presenting a report to the City Council.
- Geographic focus: Where applicable, the geographic targets of existing implementation programs are clarified.
- Timelines: Revisions provide clearer timelines for implementation of certain programs.
- Metrics: Revisions also add reasonable and achievable AFFH metrics where applicable, which are intended to aid in ongoing evaluation of program success.
- Connection to AFFH: Revisions aim to more clearly define program objectives and the overall program description, as they relate to the principles and goals of AFFH.
- Articulating previously established metrics and targeting: For some programs, revisions incorporate previously established metrics and geographic targeting.

In addition to revising existing programs that affirmatively further fair housing, the Proposed Project would add four new implementation programs to the Housing Element to better capture existing place-based efforts that have been identified in prior planning efforts and/or implemented across City Departments, and have strong commitments to AFFH. These are all existing work programs, and the metrics associated with them have been previously established through grant requirements, council report backs, or existing department policies:

- Program 133 - Mobility Improvements in Lower-Income Areas,
- Program 134 - Promote Equitable Economic Development in High Poverty and High Unemployment Areas,
- Program 135 - Place Based Community Revitalization Efforts, and
- Program 136 - Solid Ground Program

Finally, the Proposed Project would revise the structure of Program 124, which is the Housing Element's overarching AFFH Program. The Program includes a table containing the various strategies and actions identified to affirmatively further fair housing. Within the table, thirteen broader AFFH strategies link to more than 50 individual Housing Element implementation programs, where metrics, timelines, commitments and AFFH components have been summarized. The table also links these strategies and program actions to the primary contributing factors identified in the element's assessment of fair housing as well as the four AFFH issue areas identified in state law. This revised structure does not materially change the implementation of Program 124, but is intended to better clarify how the program meets statutory requirements.

Additional Technical Corrections

In addition, the Proposed Project includes minor technical corrections. This includes corrections of typographical and formatting errors, including but not limited to accrediting staff, adding references to the amendment case number and adoption dates, and revisions to Appendix 4.1 (Inventory of Adequate Sites for Housing (Table A)). The correction appends missing data for individual sites that is intended to be provided for informational purposes only, regarding the maximum number of units that would be permitted on the site after application of a development bonus. These data were inadvertently omitted due to a formatting error, but are entirely optional, not required by the state, and provided for additional clarity. The addition of these data does not affect the substance of the plan, the sites identified in the inventory, or the overall evaluation of potential site capacity.

3. IMPACT ANALYSIS

The Proposed Project consists of targeted amendments to the 2021-2029 Housing Element, the majority of which would not result in a change to the project or circumstances. Inasmuch as the addition of new programs would reflect a change to the project that was analyzed in the Housing Element EIR, these changes would not result in the need for a major revision to the EIR, as they do not result in new significant impacts or increase the severity of the significant impacts identified in the Housing Element EIR.

Revisions Not a Change to the Project or Circumstances

The proposed targeted amendments to the adopted 2021-2029 Housing Element only affect implementation programs related to the AFFH strategy, and provide relatively minimal revisions to clarify existing programs and commitments in the Housing Element. The goals, policies, and objectives included in the adopted 2021-2029 Housing Element are not proposed to be amended or modified. The amended programs are supported by the existing goals, policies, and objectives in the 2021-2029 Housing Element, and are intended to provide the necessary tools to implement and carry out the vision established by those goals, policies, and objectives. The changes to the programs are all fully within the scope of the existing programs (with the exception of the four new programs discussed below) and do not change the programs. The proposed amendments do not result in a substantive change to the adopted 2021-2029 Housing Element. The Housing Element EIR fully analyzed the environmental impacts that could occur as a result of the implementation of the 2021-2029 Housing Element.

Revisions Do Not Result in New Significant Impacts or Increase the Severity of Previously Identified Significant Impacts in the Housing Element EIR

Inasmuch as the program revisions could be considered a change to the project, for example, the creation of new implementation programs to describe place-based strategies, these revisions would not result in a change to the Housing Element EIR, and would not have new or different impacts than those previously identified and analyzed in the EIR.

As discussed in *Section 2.2*, these new programs are intended to capture existing place-based efforts that have been identified in prior planning efforts and/or implemented across City Departments. These are all existing work programs, and the metrics and commitments associated with them have been previously established through grant requirements, council report backs, or existing department policies. In particular:

Program 133, Mobility Improvements in Lower-Income Areas, incorporates existing programs and work efforts that are previously identified in the City's Mobility Plan and are implemented by the Los Angeles Department of Transportation (LADOT). This includes mobility and transportation investment programs such as Vision Zero, Great Streets, Safe Routes to Schools, and Mobility Equity Zones, which aim to provide active transportation and street improvement programs (e.g., construction of bike lanes), micro-mobility programs (e.g., dockless scooters), and provide greater access to transportation services through fare subsidies.

Program 134, Promote Equitable Economic Development in High Poverty and High Unemployment Areas, incorporates existing programs and work efforts that are implemented by the Economic and Workforce Development Department (EWDD). These programs primarily consist of grants and loans to small businesses or social services such as jobs skills training and mentoring, although they do include funding for small-scale physical improvements to existing small businesses (e.g., facade improvements).

Program 135, Place Based Community Revitalization Efforts, is a comprehensive program which summarizes a wide range of existing, ongoing place-based efforts across multiple City Departments and Agencies. This includes, for example, participatory budgeting programming, existing efforts to allocate funding to improve parks and amenities through Measure A funds (approved by LA County voters in November 2016), and a variety of resilience and climate adaptation efforts identified in the Safety Element. As noted in *Section 2.1* above, the Safety Element Update was analyzed in the Housing Element EIR.

Program 136, Solid Ground Program, incorporates existing social services programming implemented by the Community Investment for Families Department (CIFD), as they relate to homelessness prevention. This primarily involves financial assistance and wraparound services for families at risk of experiencing homelessness.

Many of the programs or components of these new programs address socio-economic conditions (such as workforce development programs), and would not entail any physical or environmental impacts, or would involve continuation of existing uses (such as services to families at risk of homelessness).

For the components of these programs that could entail physical or environmental impacts (e.g., construction of bike lanes), they would either be subject to an exemption (e.g., PRC Section 21080.25, and CEQA Guidelines Section 15301(c) for transit or bicycle improvements or minor changes to existing facilities), or the physical impacts would not differ from the type of infill

impacts already extensively analyzed in the Housing Element EIR. Potential environmental impacts of construction and operation of infill development (residential and mixed use) of all size and scale in locations throughout the City are evaluated in the Housing Element EIR, and impacts from the construction activities associated with the new programs would not be different from those analyzed in the EIR. It is not foreseeable that impacts from physical activities associated with implementation programs would have greater or different impacts than those identified in the Housing Element EIR for construction or operations. Similar to other types of development, construction activities could contribute to significant impacts, such as to historic resource and construction noise and vibration similar to those identified in Sections 4.4, Cultural Resources, and 4.10, Noise, of the Housing Element EIR. Based on the urban location and the relatively small size that would be likely to occur for any construction activities, their construction or expansion would likely qualify for an infill exemption or result in less-than-significant impacts with standard regulatory compliance measures and project specific design features or project specific mitigation measures identified through environmental review.

To the extent that any significant impacts could result from the unique characteristics of a specific site where construction activities may occur, those impacts would be speculative at this time. Additionally, as discussed many of these programs or program components, such as the Downtown Los Angeles Mobility Investment Plan (DTLA MIP) identified in Program 133, involve previous City commitments and existing ongoing programs, and as such their inclusion in the Housing Element would not foreseeably change the environment.

Therefore, program modifications and additions included in the Proposed Project would not result in a change to the Housing Element EIR, and would not have new or more severe significant impacts than those previously identified and analyzed in the EIR.

Conclusion

Based on the analysis presented above, the Proposed Project would not result in 1) substantial changes that require major revisions to the Housing Element EIR related to new or more severe significant impacts; 2) substantial changes to circumstances that require a major revision to the Housing Element EIR, related to new or more severe significant effects; or 3) new information of substantial importance regarding worsened significant effects, mitigation measures or alternatives now found to be feasible; or new mitigation measures or alternatives which are considerably different from those analyzed in the Housing Element EIR. Therefore, the Proposed Project does not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the CEQA Guidelines, and therefore the City finds that the Proposed Project was adequately analyzed in the Housing Element EIR and no further analysis beyond that contained herein is required.