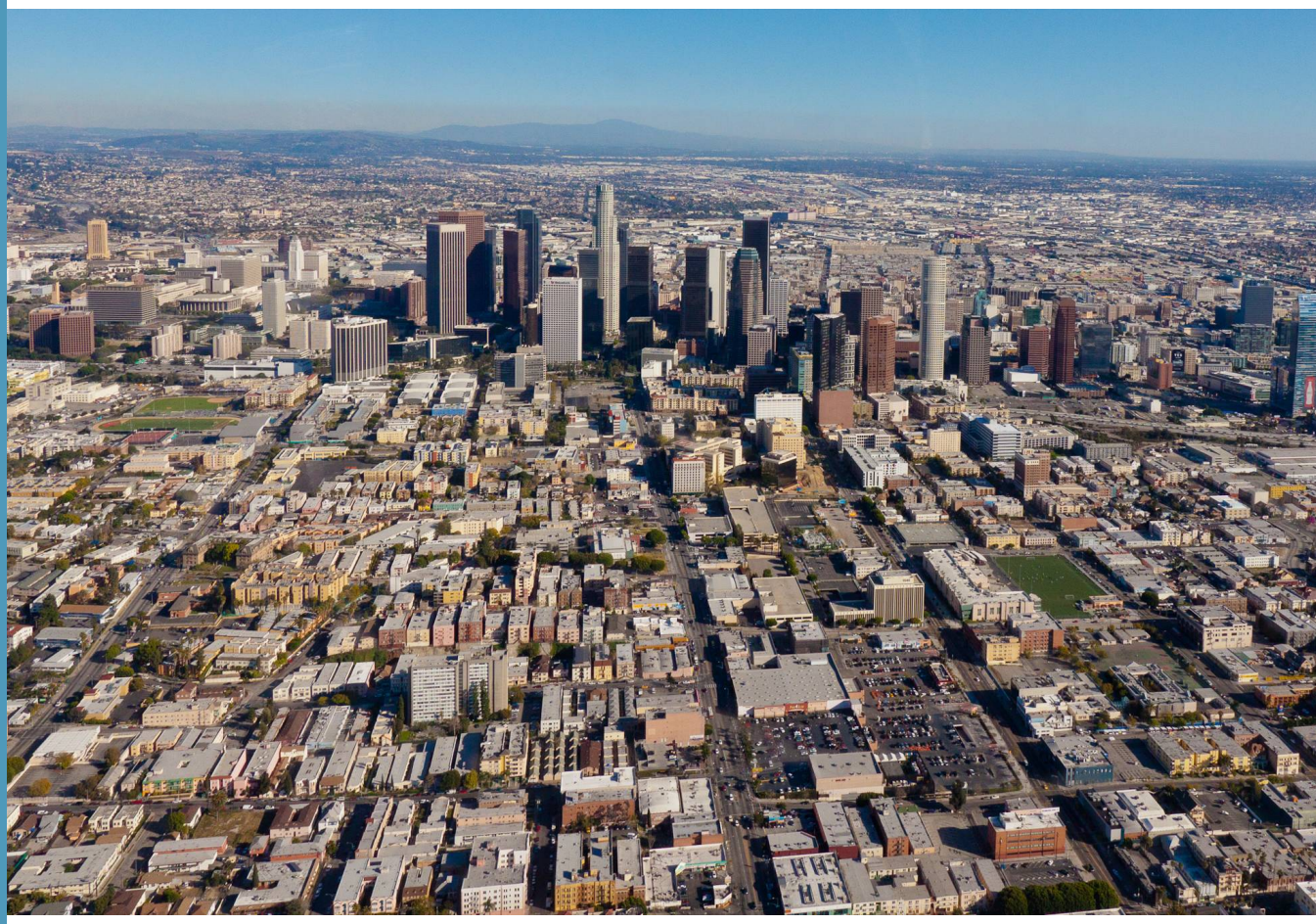
County of Los Angeles

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



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October 2020

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1. INTRODUCTION

1.1 OVERVIEW

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

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

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

This Addendum is organized into the following sections:

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

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

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

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

1.2 PROJECT LOCATION

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

1.3 LEAD AGENCY AND ADDRESS

County of Los Angeles
Department of Regional Planning
320 W. Temple Street, 13th Floor
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1.4 CONTACT PERSON AND PHONE NUMBER

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

1.5 STATUTORY AUTHORITY

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

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

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

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

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; and/or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

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

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

1.6 CEQA GUIDELINES UPDATES

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

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

1.7 BACKGROUND AND PLANNING HISTORY

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

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

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

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

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

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

1.8 OTHER PLANNING PROJECTS THAT IMPLEMENT GENERAL PLAN POLICIES

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

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

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

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

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

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

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

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

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

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

1.9 MITIGATION REQUIREMENTS

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

Table 1-1
General Plan Update EIR Mitigation Measures

Air Quality	
AQ-1	If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable Air Quality Management District (AQMD) adopted thresholds of significance, the County of Los Angeles Planning Department shall require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to: • Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. • Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards. • Limiting nonessential idling of construction equipment to no more than five consecutive minutes. • Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. • Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). • Pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. • Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust. • Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material. • Hydroseed or apply non-toxic soil stabilizers to inactive construction areas. • Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
AQ-2	New industrial or warehousing land uses that: 1) have the potential to generate 40 or more diesel trucks per day and 2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County of Los Angeles Planning Department prior to future discretionary project

	approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds ten in one million (I0E-06), particulate matter concentrations would exceed 2.5 μg/m^3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project.
AQ-3	Applicants for sensitive land uses within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities: • Industrial facilities within 1000 feet • Distribution centers (40 or more trucks per day) within 1,000 feet • Major transportation projects (50,000 or more vehicles per day) within 1,000 feet • Dry cleaners using perchloroethylene within 500 feet • Gasoline dispensing facilities within 300 feet Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to: • Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County of Los Angeles and shall be verified by the County's Planning Department.
AQ-4	If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to County of Los Angeles. Facilities that have the potential to generate nuisance odors include but are not limited to: • Wastewater treatment plants • Composting, greenwaste, or recycling facilities • Fiberglass manufacturing facilities • Painting/coating operations • Large-capacity coffee roasters • Food-processing facilities If an odor management plan is determined to be required through CEQA review, the County shall require the project applicant to submit the plan prior to approval to ensure compliance with the applicable Air Quality Management District's Rule 402, for nuisance odors. If applicable, the Odor Management Plan shall identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.
Biological Resources	
BIO-1	Biological resources shall be analyzed on a project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the project site, and focused surveys should be conducted as necessary to determine the presence/absence of special-status species (e.g., focused sensitive plant or wildlife surveys). A biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map,

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

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

	sensitive uses. This can be accomplished with vibration-reducing measures such as, but not limited to, equipment placement, equipment selection, vibration dampers, and/or changes to operation modes (speed, power, frequency).
Population and Housing	
PH-1	Prior to adoption of the Antelope Valley Area Plan Update, the County shall identify land use changes to achieve a minimum jobs-housing ratio of 1.3 for the Antelope Valley Planning Area.
Public Services	
PS-1	Prior to issuance of building permits, future project applicants/developers shall pay the Los Angeles County Fire Department Developer Fee in effect at that time.
PS-2	Each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. Final fire flows shall be determined by LACoFD in accordance with Appendix B of the County Fire Code The required fire apparatus road and water requirements shall be in place prior to construction.
PS-3	Prior to approval of a tentative map, a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area, as required by Section 1117.2.1 of the County Fire Code and approved by LACoFD prior to building permit issuance.
PS-4	Prior to adoption of the Antelope Valley Area Plan, the County shall identify an implementation program to ensure adequate funding is available to provide law enforcement services within the Antelope Valley Planning Area. The funding mechanism must provide sufficient revenue to pay for land acquisition, engineering, construction, installation, purchasing, or any other direct costs for capital law enforcement facilities and equipment needed to serve the new development in the Antelope Valley Planning Area.
Transportation/Traffic	
T-1	The County shall continue to monitor potential impacts on roadway segments and intersections on a project by project basis as buildout occurs by requiring traffic studies for all projects that could significantly impact traffic and circulation patterns. Future projects shall be evaluated and traffic improvements shall be identified to maintain minimum levels of service in accordance with the County's Traffic Impact Analysis Guidelines, where feasible mitigation is available.[2]
T-2	The County shall implement over time objectives and policies contained within the General Plan Mobility Element. Implementation of those policies will help mitigate any potential impacts of Project growth and/or highway amendments on the transportation system.
T-3	The County shall participate with Metro, the Congestion Management Program (CMP) Agency in Los Angeles County, on a potential Congestion Mitigation Fee program that would replace the current CMP Debit/Credit approach. Under a countywide fee program, each jurisdiction, including the County, will select and build capital transportation projects, adopt a fee ordinance, collect fees and control revenues. A fee program will require a nexus analysis, apply only to net new construction on commercial and industrial space and additional residential units and needs to be approved by Metro and the local jurisdictions. A countywide fee, if adopted, will allow the County to mitigate the impacts of development via the payment of the transportation impact fee in lieu of asking each development project for individual mitigation measures, or asking for fair share payments of mitigation. The fee program would itself constitute a "fair share" program that would apply to all development (of a certain size) within the unincorporated areas.
T-4	The County shall work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent unincorporated areas. This includes adding or extending mixed flow general purpose lanes, adding or extending existing HOV lanes, adding Express Lanes (high occupancy toll lanes), incorporating truck climbing lanes, improving interchanges and other freeway related improvements.
T-5	The County shall require traffic engineering firms retained to prepare traffic impact studies for future development projects to consult with Caltrans, when a development proposal meets the requirements of Statewide, regional, or area wide significance per CEQA Guidelines §15206(b). Proposed developments meeting the criteria of Statewide, regional or area wide include: • Proposed residential developments of more than 500 dwelling units

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

	• Proposed shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
	• Proposed commercial office buildings employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space
	• Proposed hotel/motel developments of more than 500 rooms
	• When the CEQA criteria of regional significance is not met, Caltrans recommends transportation engineers and/or city representatives consult Caltrans when a proposed development includes the following characteristics:
	  • All proposed developments that have the potential to cause a significant impact to state facilities (right of way, intersections, interchanges, etc.) and when required mitigation improvements are proposed in the initial study. Mitigation concurrence should be obtained from Caltrans as early as possible.
	  • Any development which assigns 50 or more trips during peak hours to a state highway (freeways).
	  • Any development located adjacent to or within 100 feet of a State highway facility and may require a Caltrans Encroachment Permit. (Exceptions: additions to single family homes or 10 residential units of less).
	  • When it cannot be determined whether or not Caltrans will expect a traffic impact analysis pursuant to CEQA.

Utilities and Service Systems	
USS-1	Require the use of drought tolerant landscaping, native California plant materials, and evapotranspiration (smart) irrigation systems.
USS-2	Require the use of low-flow fixtures in all non-residential development and residential development with five or more dwelling units, which may include but are not limited to water conserving shower heads, toilets, waterless urinals and motion-sensor faucets, and encourage use of such fixtures in building retrofits as appropriate.
USS-3	Require low water use landscaping in new residential subdivisions and other private development projects, including a reduction in the amount of turf-grass.
USS-4	Promote the use of low-flow and/or waterless plumbing fixtures and appliances in all new non-residential development and residential development of five or more dwelling units.
USS-5	Support amendments to the County Building Code that would promote upgrades to water and energy efficiency when issuing permits for renovations or additions to existing buildings.
USS-6	Apply water conservation policies to all pending development projects, including approved tentative subdivision maps to the extent permitted by law. Where precluded from adding requirements by vested entitlements, encourage water conservation in construction and landscape design.
USS-7	Require new development to provide the infrastructure needed for delivery of recycled water to the property for use in irrigation, even if the recycled water main delivery lines have not yet reached the site, where deemed appropriate by the reviewing authority.
USS-8	Promote the installation of rainwater capture and gray water systems in new development for irrigation, where feasible and practicable.
USS-9	Promote energy efficiency and water conservation upgrades to existing nonresidential buildings at the time of major remodel or additions.
USS-10	Promote the use of permeable paving materials to allow infiltration of surface water into the water table.
USS-11	Maintain stormwater runoff on site by directing drainage into rain gardens, natural landscaped swales, rain barrels, permeable areas, and use of drainage areas as design elements, where feasible and reasonable.
USS-12	Seek methods to decrease impermeable site area where reasonable and feasible, in order to reduce stormwater runoff and increase groundwater infiltration, including use of shared parking and other means, as appropriate.
USS-13	On previously developed sites proposed for major alteration, provide stormwater management improvements to restore natural infiltration, as required by the reviewing authority.
USS-14	Encourage and promote the use of new materials and technology for improved stormwater management, such as pervious paving, green roofs, rain gardens, and vegetated swales.
USS-15	Where detention and retention basins or ponds are required, seek methods to integrate these areas into the landscaping design of the site as amenity areas, such as a network of small ephemeral swales treated with attractive planting.
USS-16	Evaluate development proposals for consistency with the County Green Building Standards Code.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1.11 INCORPORATION BY REFERENCE

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

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

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

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

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

2.0 PROJECT DESCRIPTION

2.1 LOS ANGELES COUNTY GENERAL PLAN UPDATE PEIR

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

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

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

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

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

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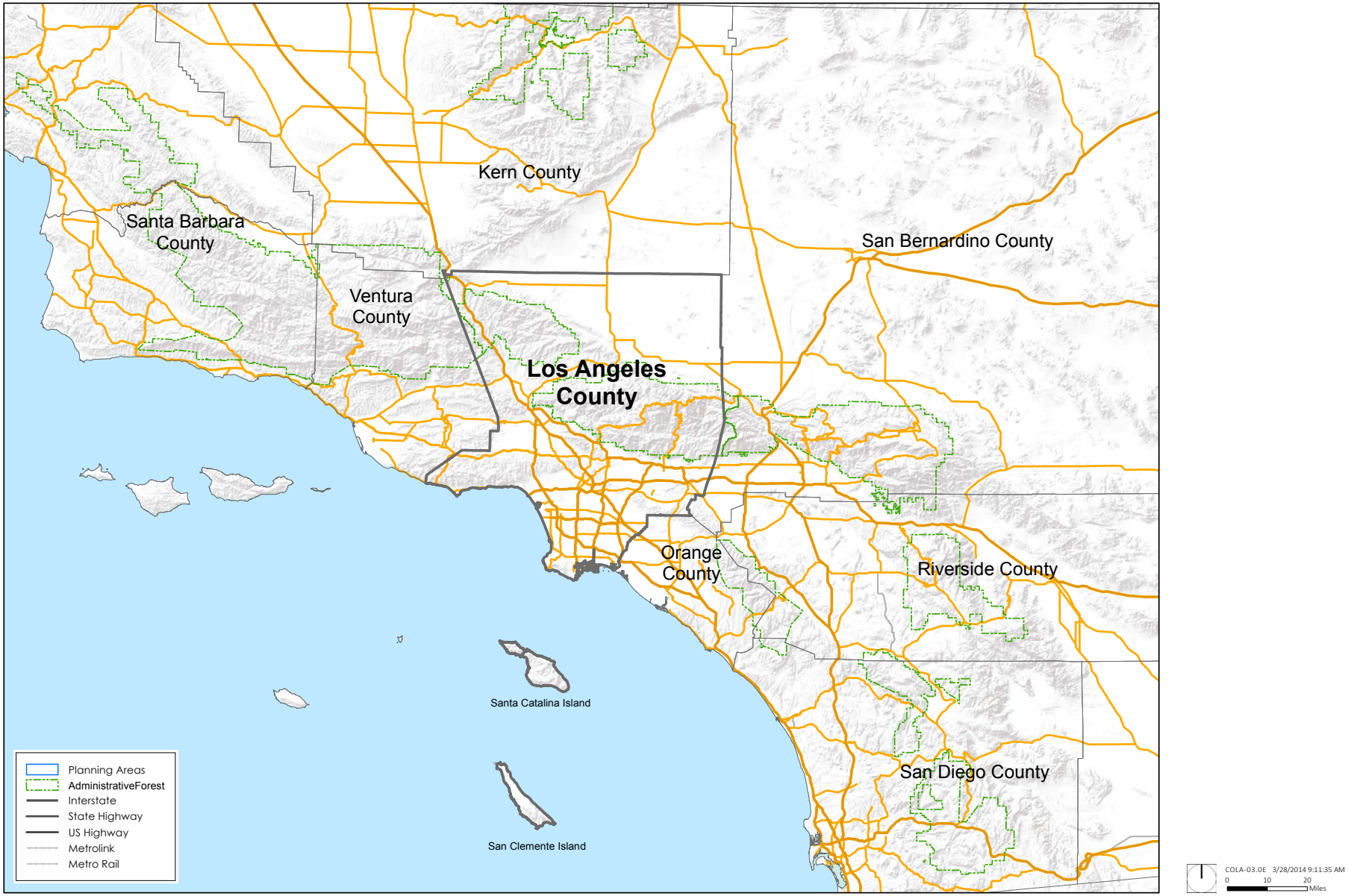
1 Los Angeles County, General Plan 2035 Programmatic EIR, Certified October 6, 2015 available at: http://planning.lacounty.gov/generalplan/eir



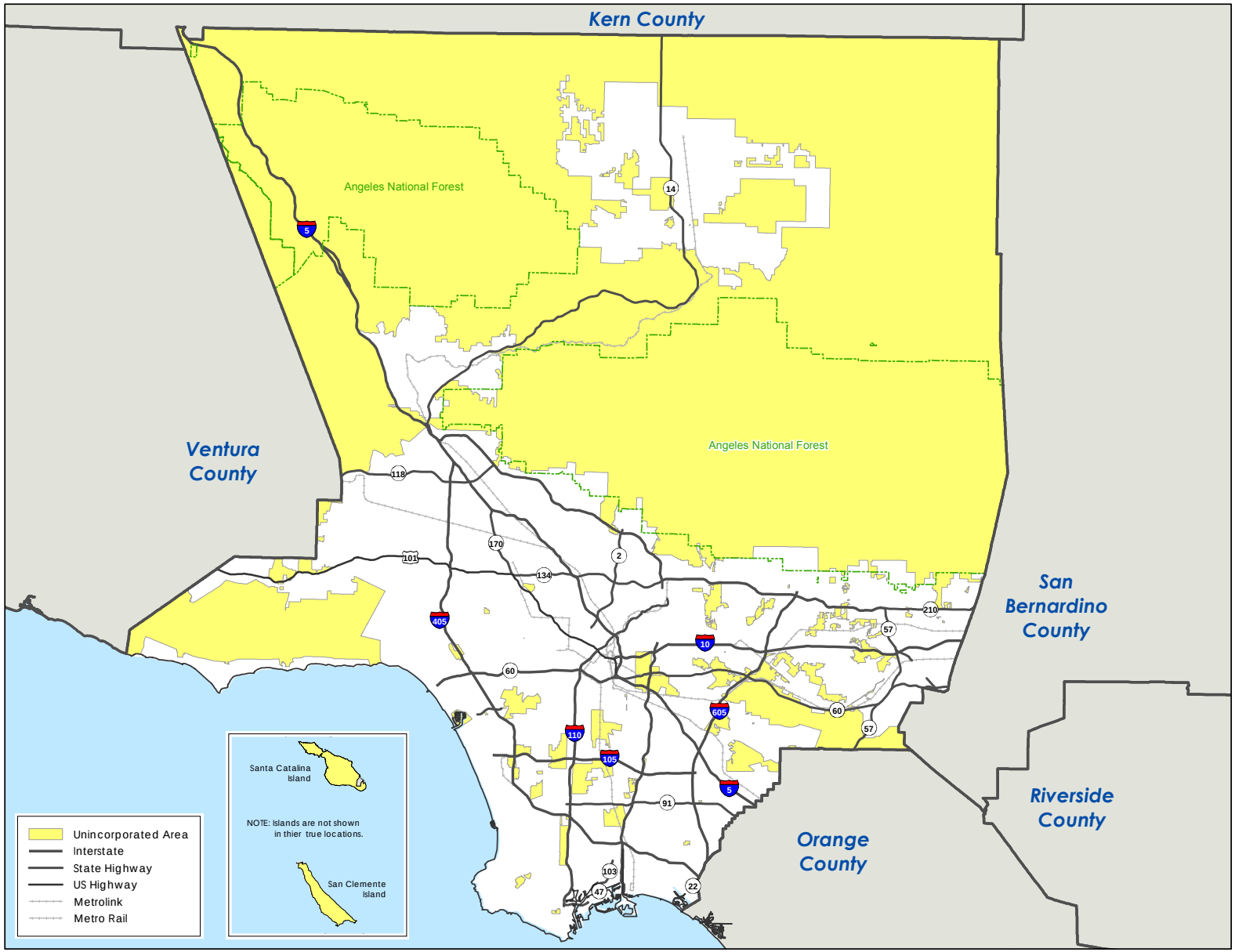
SOURCE: Placeworks, 2014; ESRI, 2014

FIGURE **2-1**

IMPACT SCIENCES

Regional Vicinity

1337.001•01/2020



SOURCE: Placeworks, DRP, 2013

FIGURE **2–2**

IMPACT SCIENCES

Unincorporated Areas of Los Angeles County

1337.001•01/2020

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

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

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

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

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

Source: General Plan 2035 EIR, Table 3-7

2.2 BACKGROUND

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

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

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

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

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

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

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

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

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

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

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

- No net loss: requires one-to-one replacement of rental units occupied by extremely low, very low, lower or moderate income households within the previous five years that are demolished, vacated or converted from rental to for-sale. The replacement units must be deed-restricted to ensure affordability to extremely low, very low, lower or moderate income residents. Alternatives include on-site or off-site replacement, or payment of a replacement fee. Off-site replacement would only be allowed if replacement is provided as part of an inclusionary housing project that does not use a density bonus (few such projects are anticipated to occur).

- Condominium conversions: requires notification to organizations qualified to preserve affordable rental housing prior to submitting an application to convert rental housing to condominiums.

- Mobilehome park preservation: preserve mobilehome parks as a viable lower-cost housing option by clarifying and streamlining requirements to their establishment and continued operation. (Many mobilehome parks predate the current zoning code.).

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

2.3 PROJECT CHARACTERISTICS

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

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

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

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

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

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

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

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

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

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

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

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

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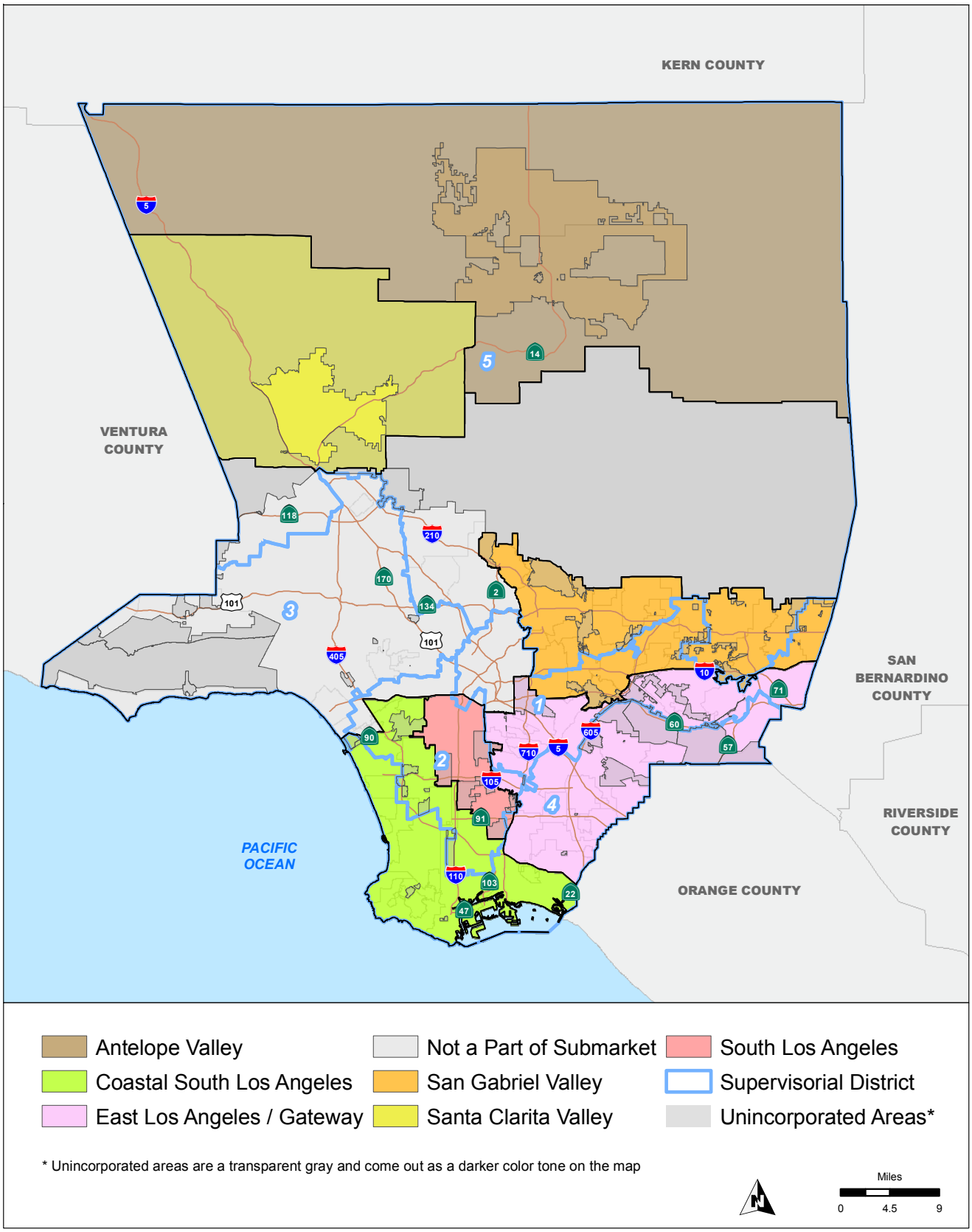
7 Off-site housing must meet inclusionary housing ordinance locational requirements that sites must be located in an unincorporated area of Los Angeles County and be one of the following: within one-quarter mile of the principal project or developed as part of a community land trust. In addition, the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



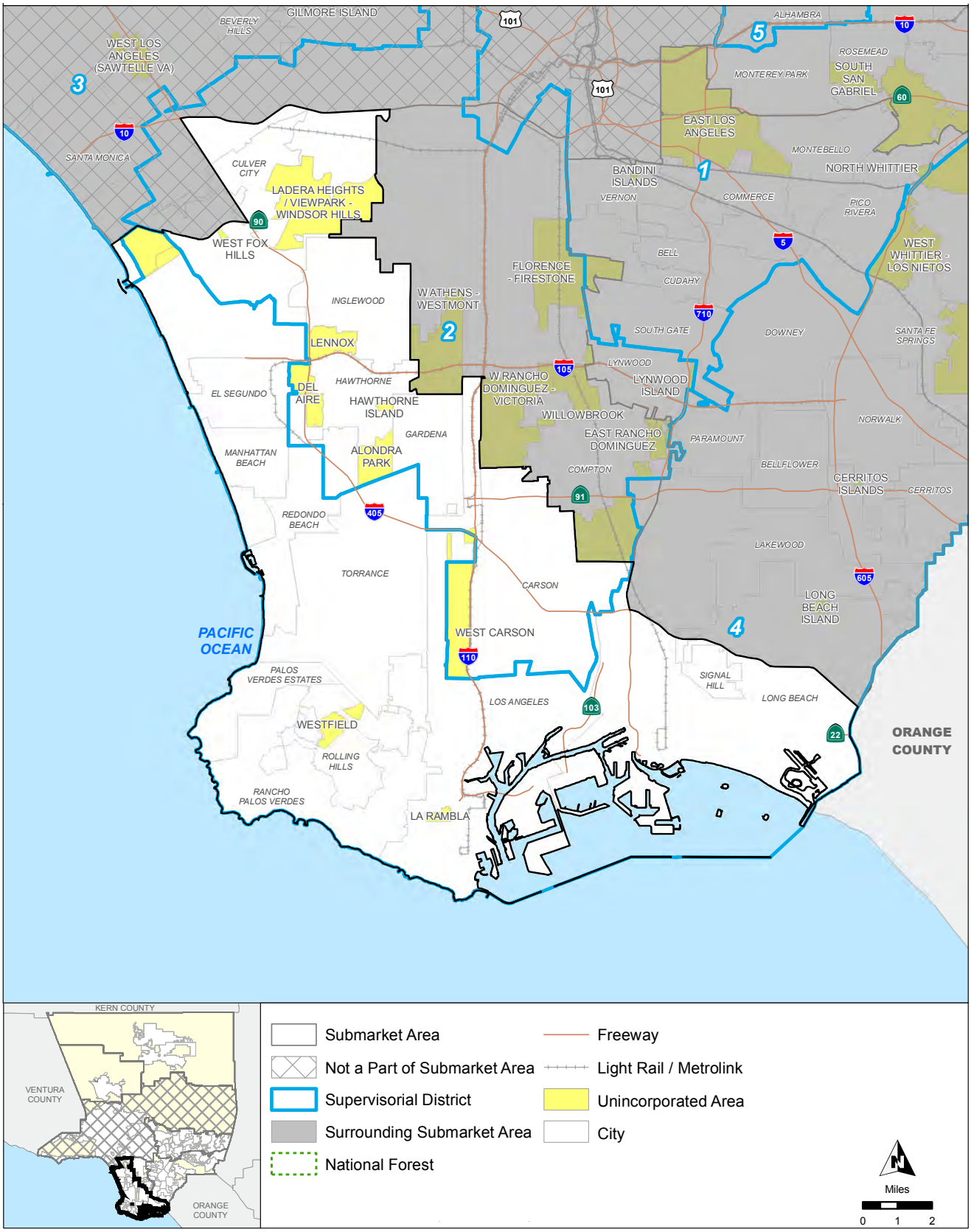
SOURCE: Deparement of Regional Planning & KMA, 2017

FIGURE **2-3**

IMPACT SCIENCES

Los Angeles County Submarket Areas

1337.001•01/2020



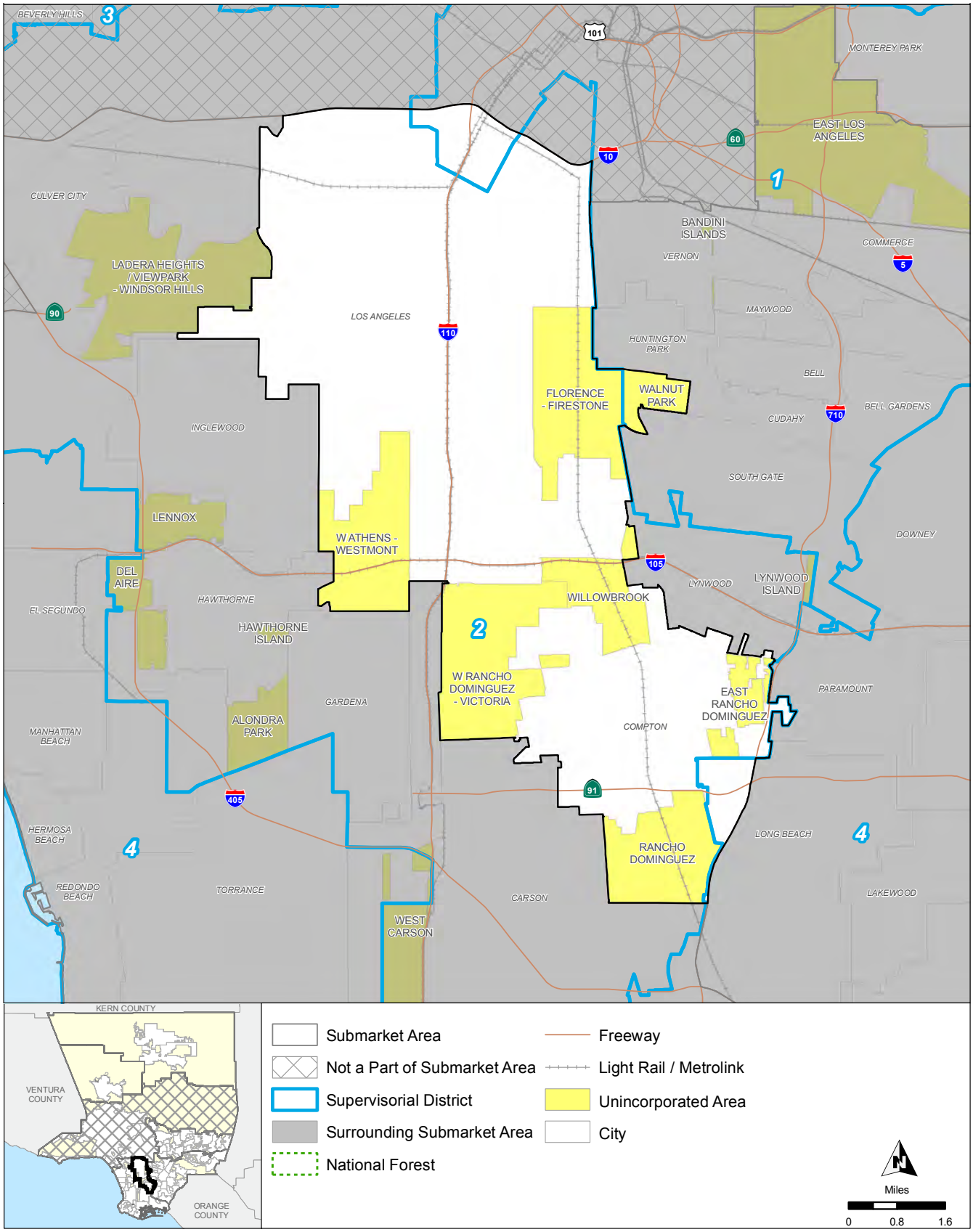
SOURCE: Deparement of Regional Planning & KMA, 2017

FIGURE **2-4**

IMPACT SCIENCES

Coastal South Los Angeles Submarket Area

1337.001•01/2020



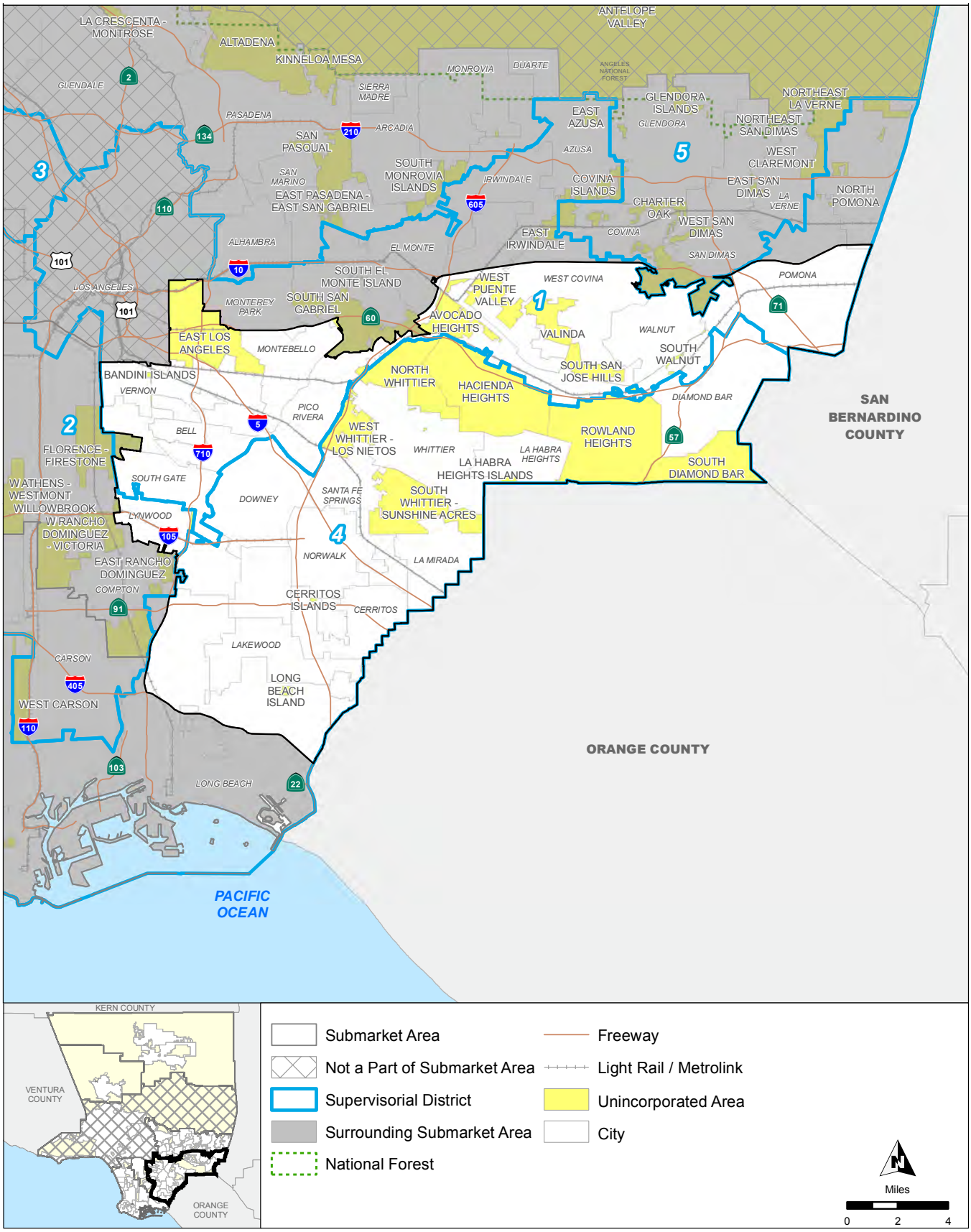
SOURCE: Deparement of Regional Planning & KMA, 2017

FIGURE **2-5**

IMPACT SCIENCES

South Los Angeles Submarket Area

1337.001•01/2020



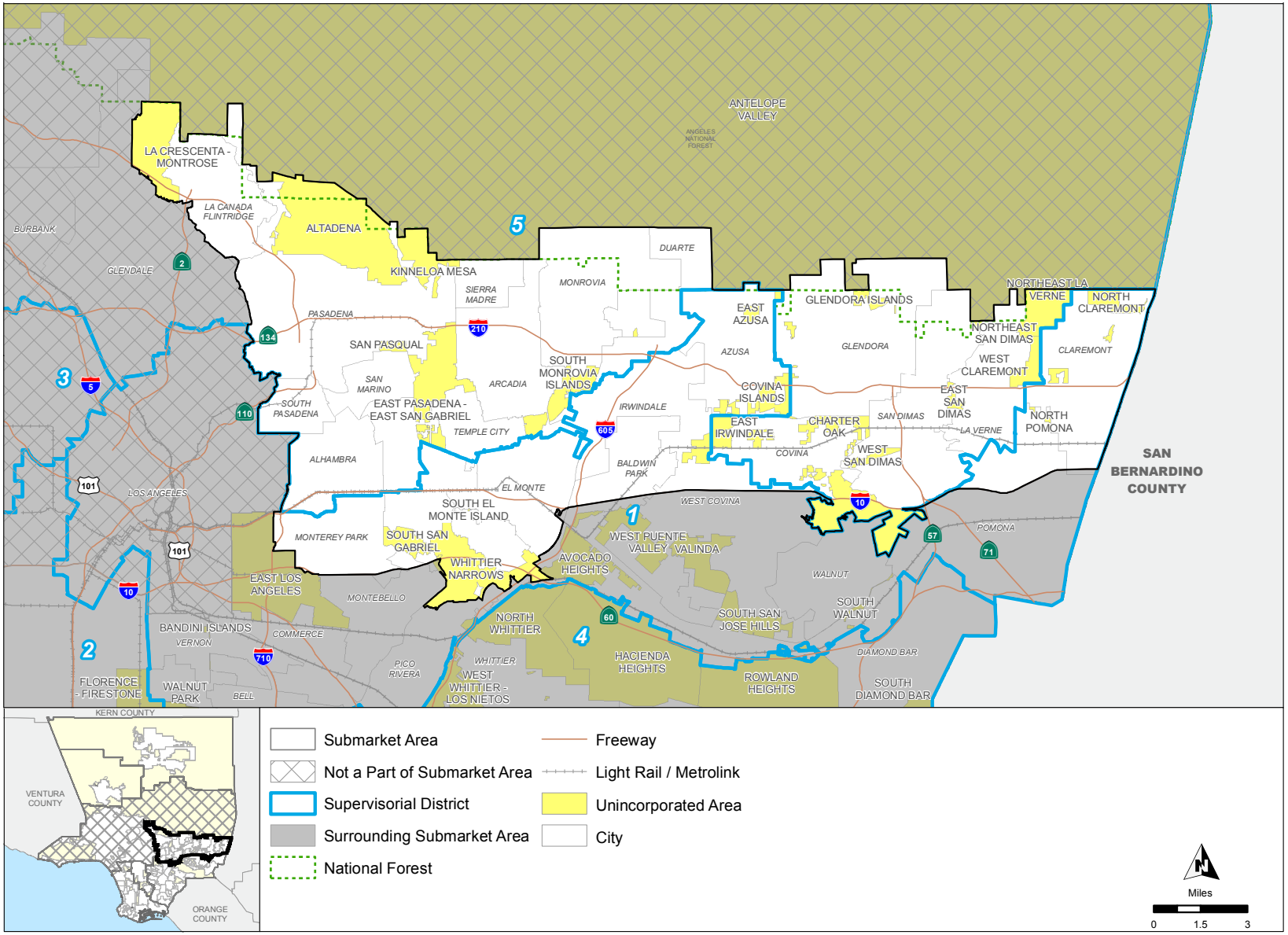
SOURCE: Deparement of Regional Planning & KMA, 2017

FIGURE **2-6**

IMPACT SCIENCES

East Los Angeles Gateway Submarket Area

1337.001•01/2020



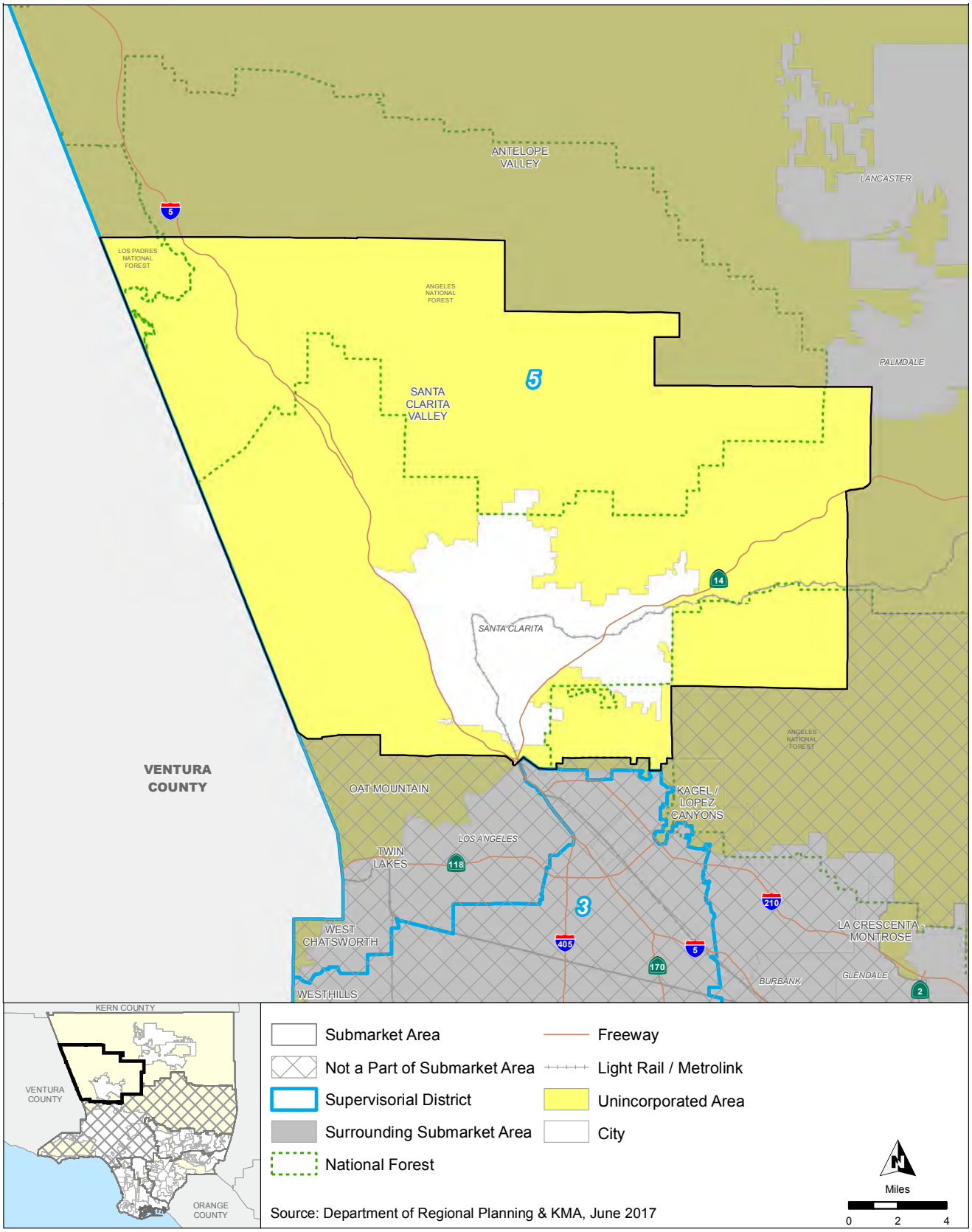
SOURCE: Department of Regional Planning, KMA, 2017

FIGURE **2–7**

IMPACT SCIENCES

San Gabriel Valley Submarket Area

1337.001•01/2020



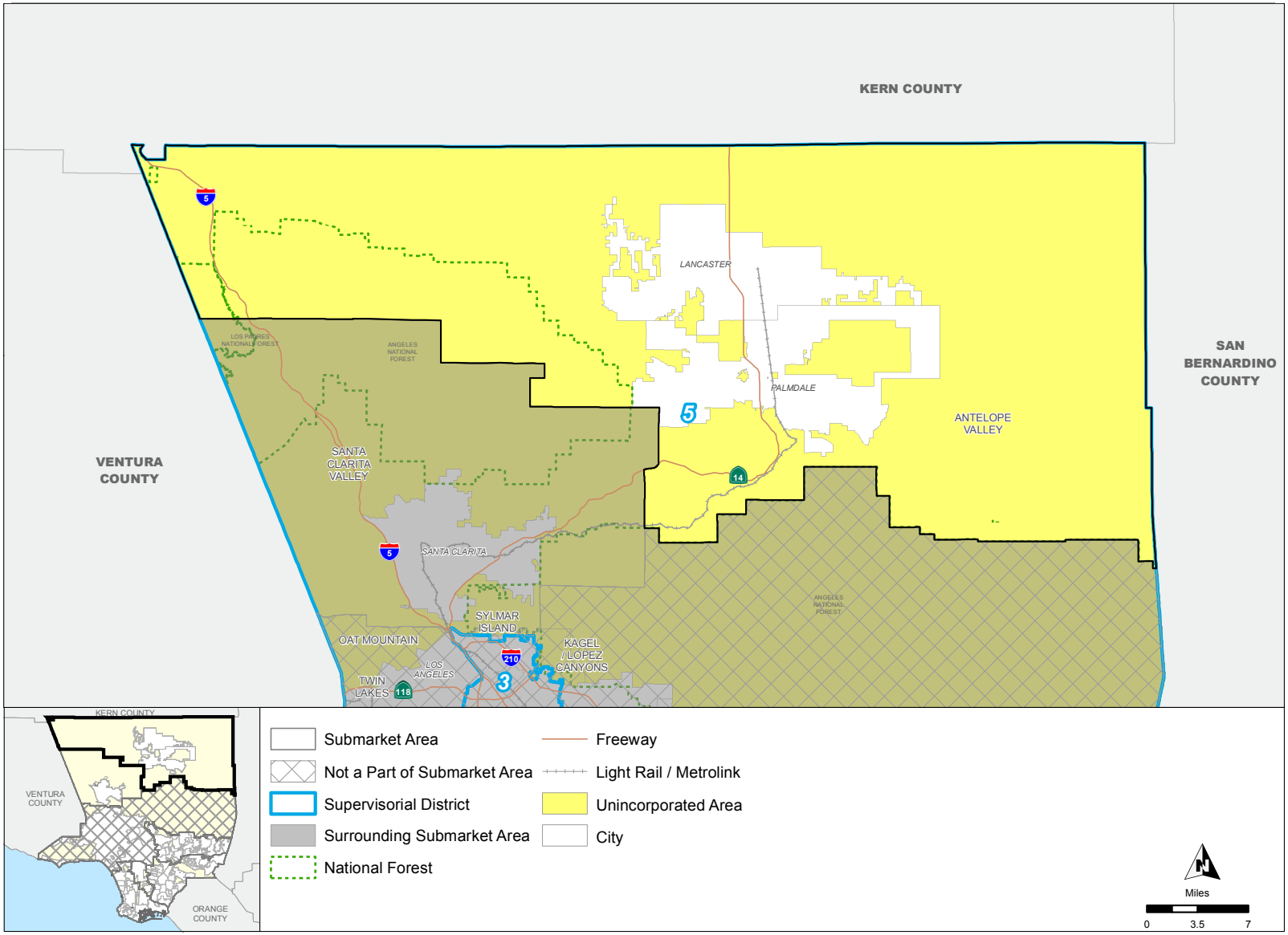
SOURCE: Deparement of Regional Planning & KMA, 2017

FIGURE **2-8**

IMPACT SCIENCES

Santa Clarita Valley Submarket Area

1337.001•01/2020



SOURCE: Department of Regional Planning, KMA, 2017

FIGURE **2-9**

IMPACT SCIENCES

Antelope Valley Submarket Area

1337.001•01/2020

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

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

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

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

Table 2-3
Affordable Housing Replacement Fees

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

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

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

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

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

2.4 PROJECT OBJECTIVES

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

2.5 DISCRETIONARY ACTIONS AND APPROVALS

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

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

3.0 ENVIRONMENTAL ANALYSIS

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

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

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

3.1 AESTHETICS

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation that would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

3.3 AIR QUALITY

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

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

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

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

3.4 BIOLOGICAL RESOURCES

(a) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to having a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

(d) Does the proposed AHPO Require Subsequent or Supplemental CEQA Documentation with respect to interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

3.5 CULTURAL RESOURCES

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

Tribal Cultural Resources

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

Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to use a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

(e) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

(f) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

3.6 GEOLOGY AND SOILS

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

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

(a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?

iv) Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

Rupture of a Known Earthquake Fault

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

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

Strong Seismic Ground Shaking

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

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

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

Liquefaction

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

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

Seismically Induced Landslides

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

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

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

(b) Result in substantial soil erosion or the loss of topsoil?

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

Erosion

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

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

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

Unstable Geologic Units or Soils and Expansive Soils

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

3.7 GREENHOUSE GAS EMISSIONS

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

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

To achieve the local goals identified in CARB's 2008 Scoping Plan, the General Plan Update included the CCAP which identifies and evaluates feasible and effective policies to reduce GHG emissions. Implementation of the CCAP would be necessary to ensure that the local GHG reduction goals for the County under AB 32 would be met. Adoption and implementation of the CCAP in its entirety would reduce GHG emissions to less than significant levels. However, in the absence of an adopted CCAP, consistency with plans adopted for the purpose of reducing GHG emissions toward the short-term target of AB 32 could be significant. The General Plan Update EIR found impacts would be significant and unavoidable.

The AHPO would maintain the County's existing affordable housing stock by requiring one-for-one replacement of any units demolished or vacated as part of a project. Projects developed under the AHPO would be consistent with the statewide GHG reduction policies evaluated within the General Plan Update. Since the adoption of the General Plan Update in 2015, the state has passed SB 32, which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. The General Plan Update determined that the CCAP was necessary to meet local goals within the 2008 CARB Scoping Plan to meet AB 32. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.8 HAZARDS AND HAZARDOUS MATERIALS

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

(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR indicates that land uses in the County typically involve the use, storage, disposal and transportation of hazardous materials, such as fuels, lubricants, solvents and degreasers, and paints. The General Plan Update EIR indicates that the transportation of hazardous materials/waste may increase as a direct result of increased hazardous materials/waste usage within Los Angeles County. An increase in hazardous materials usage and transport could result in adverse environmental effects.

Numerous federal, state, and local regulations exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. Implementation of the General Plan Update would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses would be required to comply with applicable federal, state, and local regulations related to hazardous materials. The General Plan Update EIR found impacts would be less than significant.

The AHPO requires replacement of lost affordable units on a one-for-one basis. Much of the County's affordable housing stock is older and therefore could contain hazardous materials such as asbestos or lead paint. Handling of hazardous materials in the course of construction would be regulated by existing Health & Safety Code and Fire Code requirements. In some cases, a project level environmental assessment would determine the potential for impacts as well as any required mitigation.

Further, affordable housing units demolished and constructed under the AHPO do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the AHPO would not involve the substantial transport, use, and disposal of hazardous materials. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to being located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment. ?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR indicates that numerous sites within the County are listed on hazardous materials databases complied pursuant to Government Code § 65962.5. Some of the sites are listed as closed, indicating that they have been investigated and/or remediated to the satisfaction of the lead responsible agency (e.g. RWQCB, DTSC, ACDEH, ACWD) based on land use at the time of closure. The General Plan Update would facilitate new development, including residential, mix-use, commercial, parks, and recreational open spaces, within Los Angeles County. Some of the new development could occur on properties that are likely contaminated. However, Federal and state regulations exist that prevent or reduce hazards to the public and environment from existing hazardous materials sites. In addition, the General Plan Update includes several policies within the Land Use Element that would reduce the potential for the

public and the environment to be exposed to hazardous materials from existing site contamination. Compliance with applicable existing regulations and processes would ensure that the General Plan Update would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites. The General Plan Update EIR found impacts would be less than significant.

Some AHPO projects could occur on properties that may be contaminated. However, federal and state regulations as well as policies within the Land Use Element of the General Plan would reduce the potential for the public and the environmental to be exposed to hazardous materials from existing site conditions. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would result in a safety hazard for people residing or working in the County?

(f) For a project in the vicinity of a private airstrip, result in a safety hazard for people residing or working in the County?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concludes that federal and state regulations exist that prevent hazards to the public and environment near public airports. These include FAA regulations, which establish safety standards for civil aviation, and the State Aeronautics Act, which establishes air safety standards. In addition, the County requires that development projects near public airports comply with any applicable Airport Land Use Compatibility Plan. Implementation of the General Plan Update may result in land use designations that allow development within two miles of a public airport, private airstrip, or heliport. However, existing FAA regulations, County policies and regulations, and General Plan Update goals and policies are intended to identify and properly address potential airport hazards prior to implementation of specific projects within the County. The General Plan Update EIR found impacts would be less than significant.

AHPO projects could be constructed within two miles of a public airport, private airstrip, or heliport. However, all projects would be subject to existing FAA regulations, County policies and regulations, and General Plan Update goals and policies intended to address potential airport hazards to specific projects.

Furthermore, the AHPO by itself would not increase the number of units that are allowed to be built since it only requires the replacement of affordable units on a one-for-one basis. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(g) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR indicates that continued growth and development in Los Angeles County will significantly affect the Los Angeles County Fire Department (LACoFD) and Los Angeles County Sheriff's Department (LASD) operations. Coordination among various County departments is necessary to ensure adequate emergency response. Collaboration can also ensure that development occurs at a rate that keeps pace with service needs. In addition, several proposed policies of the Safety Element of the General Plan have been developed to address this potential hazard. The General Plan Update EIR found that compliance with applicable regulations and implementation of the General Plan Update goals and policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan is less than significant.

Disaster routes mapped in the General Plan Safety Element are freeways and highways. Therefore, it is unlikely that a project would be approved that blocks access to the public right of way .New development generally would not occur as a result of the AHPO. Projects subject to the AHPO would be required to implement applicable regulations as well as General Plan Update goals and policies to reduce the risk of impaired implementation or physical interference of an adopted emergency response plan or emergency evacuation plan. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(h) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to the urbanized areas or where residences are intermixed with wildlands?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concluded that portions of the County are within moderate, high, and very high fire hazard zones and could expose structures and/or residences to fire danger. Although fires are a natural part of the wildland ecosystem, development in wildland areas increases the danger of wildfires to residents, property, and the environment. Although multiple regulations are in place to ensure that adequate infrastructure, such as peak load water supplies and necessary disaster routes are incorporated into new developments, older communities with aging and substandard infrastructure may face greater risks from wildland fires. The General Plan Update EIR concludes that policies and conditions of approval for future development projects within the County, in addition to compliance with applicable regulations, will minimize impacts related to wildland fires. The General Plan Update EIR found impacts would be less than significant.

Los Angeles County's VHFHSZs are mostly forest areas, such as the Angeles National Forest and Los Padres National Forest. These forest areas are zoned for watershed, open space, agriculture, and a limited amount of low-density residential and rural commercial development. The replacement requirements of the AHPO do not apply within VHFHSZs, a designation that applies to areas where residences are intermixed with wildlands. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.9 HYDROLOGY AND WATER QUALITY

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on the environment, which may include future residents and users within the County. The following analysis recaps the General Plan Update EIR for informational purposes,

but potential impacts of the environment on a project are no longer considered potentially significant per the CBIA v BAAQMD decision.

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the violation of any water quality standards or waste discharge requirements?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concludes that implementation of the General Plan Update would comply with water quality standards and waste discharge requirements and would not substantially degrade water quality. Construction projects of one acre or more in area in each of the three Water Board regions (Los Angeles, Lahontan, and Central Valley) would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2012. Projects obtain coverage by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. The General Plan Update EIR found impacts would be less than significant upon compliance with regulatory requirements and General Plan Update policies.

AHPO projects would be required to develop and implement a SWPPP and BMPs to minimize pollution of runoff. As such, impacts would remain less than significant upon compliance with regulatory requirements and General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concluded that development pursuant to the General Plan Update would interfere with groundwater recharge. Developments in the unincorporated areas of Planning Areas would be mostly limited to redevelopments and reuses of currently developed areas. Thus, redevelopments in those Planning Areas would result in relatively minor increases in impervious areas. Consequent impacts on groundwater recharge would be minimal. The General Plan Update EIR found impacts would be less than significant.

The AHPO requires replacement of lost affordable housing units. It is anticipated that most replacement units would be built within the envelope of the project that would occur regardless of the AHPO. To the extent that replacement units are located off-site they are subject to certain locational requirements that make it most likely that these units would occur in existing urban areas. Therefore, it is unlikely there would be a substantial increase in impervious surface as a result of the AHPO. Any increase in imperious surface as a result of the off-site units constructed as a result of the AHPO would be within the increases analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concluded the General Plan Update would not substantially alter drainage patterns in Los Angeles County and would not result in substantial erosion or siltation. Under the MS4 Permit certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. These requirements would ensure that there would not be a substantial change in drainage patterns in the Los Angeles Water Board Region, Lahontan Water Board Region, and Central Valley Water Board Region. The General Plan Update EIR found impacts would be less than significant.

Similar to the General Plan Update, AHPO projects would be required to mimic predevelopment hydrology, evapotranspiration, and rainfall harvest as required by the MS4 permit. As a result, the AHPO would not create a substantial change in drainage patterns to the Los Angeles Water Board Region, Lahontan Water Board Region, or the Central Valley Water Board Region. The AHPO would not

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

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR found that forecast development would not change drainage patterns in Los Angeles County or in parts of adjoining counties in watersheds extending from Los Angeles County into those counties. Under the MS4 Permits in the Los Angeles and Central Valley Water Board regions, certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Projects within the Los Angeles Regional Water Quality Control Board (LARWQCB) Region and subject to low impact development (LID) requirements are required must limit post-development peak stormwater runoff discharge rates to no greater than the estimated pre-development rate for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion. Developments pursuant to the General Plan Update would not substantially increase runoff rates or volumes and substantial consequent flood hazards would not occur. The General Plan Update EIR found impacts would be less than significant.

AHPO projects would be constructed within the Los Angeles and Central Valley Water Board Regions. The MS4 permits in these areas will require the projects to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Any grading or paving would need to comply with LID and NPDES requirements to receive construction permits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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

(e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

(f) Otherwise substantially degrade water quality?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR found impacts related to stormwater drainage and polluted runoff to be less than significant as a result of required compliance with existing regulations (including requirements for Stormwater Pollution Prevention Plans – SWPPP, MS4 and other requirements applicable to the Los Angeles and Lahontan regions).

The AHPO would not substantially increase units or developed area and would not be expected to substantially contribute to polluted runoff. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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

(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR found that forecast housing development could occur within 100-year flood hazard areas. However, development within 100-year flood zones would require improvements to flood control facilities, and issuance of Letters of Map Revision by the Federal Emergency Management Agency (FEMA) showing changes to 100-year flood zones reflecting such improvements; or that the floor beams of the lowest floor of the structure are raised above the 100-year flood elevation. Flood insurance available through the National Flood Insurance Program (NFIP) would also be required. Therefore, buildout of the General Plan Update would not place substantial numbers of people or structures at risk of flooding in 100-year flood zones, and impacts would be less than significant.

If a project is subject to the AHPO is constructed within these flood zones, they would also be required to improve flood control facilities and issuance of Letters of Map Revision by FEMA to demonstrate improvement; or construct floor beams raised above the 100-year flood elevations. Additionally, these projects would be required to comply with the County's municipal code for building with flood-prone areas. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(i) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR indicates that dam inundation areas span some unincorporated areas of all the County except the South Bay Planning Area; and parts of the Antelope – Fremont Valleys, Santa Clara, San Gabriel River, Santa Monica Bay, Los Angeles River, and San Pedro Channel Islands watersheds. Considering the relatively small proportional net increases in numbers of residents and workers that would be put at potential risk from dam inundation; the operation of most of the dams as flood control dams, not impounding large reservoirs most of the time; and safety requirements and inspections by the Division of Safety of Dams, the General Plan Update EIR found that impacts would be less than significant.

It is possible that AHPO projects could occur within dam inundation zones. However, as noted in the General Plan Update EIR, there is a relatively small proportional net increase in numbers of residents and workers that would be put in potential risk. Moreover, most of the dams are flood control dams subject to the safety requirements and inspections by the Division of Safety of Dams. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(j) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to inundation by seiche, tsunami, or mudflow?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

As analyzed in the General Plan Update EIR, parts of the County are subject to inundation by seiche, tsunami, or mudflow. Buildout of the General Plan Update would not subject substantially increased numbers of people or structures to tsunami flood hazards. Therefore, buildout of the General Plan Update would not subject substantially increased numbers of people or structures to tsunami flood hazards. Impacts would be less than significant.

Geotechnical investigations would be required for the development of structures for human occupancy pursuant to the General Plan Update. Where such geotechnical investigations identified mudflow hazard areas in or next to the sites of proposed structures or other improvements, the geotechnical investigations would include recommendations for minimizing such hazards. Compliance with recommendations of geotechnical investigations is required under the County Grading Code, Title 26, Appendix J of the County Code. Impacts would be less than significant after compliance with recommendations in geotechnical investigations.

The presence of a potential landslide hazard will be determined at the project level. The only unincorporated area in a tsunami hazard zone is Marina del Rey, which is already built-out with high-density housing and is subject to the Marina del Rey Local Coastal Program, which contains analysis and policies governing assessment of tsunami and seiche risk. Further, Marina del Rey would not be subject to the AHPO as it has a Specific Plan with an affordable housing requirement and mobilehome parks are not a permitted use. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.10 LAND USE AND PLANNING

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the potential to physically divide an existing community?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update identifies proposed and planned roadways in Los Angeles County. At a programmatic level, the General Plan Update does not allow land uses patterns that would result in division of an established neighborhood or community. Although policy maps included in the Land Use and Mobility Elements of the General Plan identify locations for Transit Oriented Districts, highways, and transit projects, these changes and improvements are not anticipated to divide established neighborhoods. Impacts would be less than significant.

The AHPO requires one-for-one replacement of any lost affordable housing units. Projects subject to the AHPO are anticipated to be generally consistent with the existing zoning and the allowable densities specified in the General Plan Land Use Element and DBO; any proposed zone change would require discretionary action. Any projects that are not consistent with zoning or the General Plan land use designation (and therefore with the potential to disrupt an existing neighborhood) would be subject to the County process for zone changes or General Plan amendments. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concluded that the General Plan Update would not conflict with goals contained within SCAG's 2012–2035 RTP/SCS or other land use plans. Therefore, impacts related to compatibility between the General Plan Update and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant.

Projects developed under the AHPO would be subject to environmental review for consistency with local land use plans, goals, and policies, some of which may call for more affordable housing. The AHPO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by maintaining the existing supply of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with any applicable habitat conservation plan or natural community conservation plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concluded that the General Plan Update would not conflict with adopted habitat conservation plans. Although buildout of the General Plan Update would include development and redevelopment in areas covered by conservations plans, such development would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.

As described in **Section 3.4 Biological Resources** any AHPO project developed in an area covered by conservation plans would be required to comply with provisions of those plans. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.11 MINERAL RESOURCES

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concludes that implementation of the General Plan Update would cause the loss of availability of a known mineral resource in the Antelope Valley Planning Area but not in the other 10 Planning Areas. No mitigation measures are available that would reduce impacts of buildout from the General Plan to less than significant. The General Plan Update EIR found that mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. The General Plan Update EIR found that compensatory mitigation outside of the region was infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate. The General Plan Update EIR found impacts to be significant and unavoidable.

Buildout of the General Plan Update would not substantially reduce the regional availability of oil and natural gas, and it would not render any large oil fields completely inaccessible. Furthermore, development of residential, commercial, and other urban uses does not preclude the continued use of nearby oil wells. Therefore, the geographic scope of areas available for the extraction of oil and natural gas are not expected to be dramatically reduced by implementation of the General Plan Update. The General Plan Update EIR found impacts to oil and gas to be less than significant.

The AHPO would not substantially reduce the regional availability of oil and natural gas. While AHPO projects could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the AHPO are currently in use as mineral extraction. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concluded that implementation of the General Plan Update would cause a substantial loss of availability of mineral resources in one mineral extraction area: the Little Rock Wash area in the Antelope Valley Planning Area. The General Plan Update EIR found no mitigation measures that would reduce impacts of buildout from the General Plan Update to less than significant. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate. The General Plan Update EIR found impacts to be significant and unavoidable.

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

3.12 NOISE AND VIBRATION

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR found that anticipated development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment. It also found that construction activities such as the transport of workers and movement of

materials to/from work sites could incrementally increase noise levels along local access roads. Furthermore, the General Plan Update EIR found that demolition, site preparation, grading, and/or physical construction would result in temporary increases in the ambient noise environment in the vicinity of each individual project. Implementation of policies within the General Plan Update would reduce traffic noise impacts to existing noise sensitive uses to the extent feasible. However, no additional feasible mitigation measures are available to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within Los Angeles County that would be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site traffic noise impacts to existing uses (such as through the construction of sound walls and/or berms) may often be out of proportion with the level of impact. The General Plan Update EIR found impacts to be significant and unavoidable.

AHPO projects could generate some construction noise and could expose residents to sources of noise. However, construction activities are subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. The AHPO could lead to an incremental increase in the size of a project. However, this incremental increase would not generate significant amounts of noise compared to other types of uses. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Traffic associated with development under the AHPO would be within the assumptions made and analyzed in the General Plan Update EIR. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concluded that development could create elevated levels of groundborne vibration and groundborne noise; both in the short-term (construction) and the long-term (operations).

Vibration impacts may occur from construction equipment associated with development in accordance with the General Plan Update. **Mitigation Measure N-3** (train-related vibration), would reduce potential train-related vibration impacts to new uses below the thresholds (i.e., below 0.08 RMS in/sec for residential uses). **Mitigation Measure N-4** (construction-related vibration) would reduce vibration impacts associated with construction activities to the extent feasible. **Mitigation Measure N-5** (industrial-related vibration) would reduce potential vibration impacts from industrial uses to less-than-significant levels. The General Plan Update EIR found that due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts would be significant and unavoidable.

The AHPO is not anticipated to result in significant generation of groundborne vibration or groundborne noise levels in excess of County standards. AHPO projects are primarily expected to be located in zones that allow housing. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. The AHPO would not induce the development of industrial land uses typical of excessive groundborne vibration or groundborne noise levels. However, construction of AHPO projects could result in short-term ground-borne vibration or groundborne noise levels and would be required to implement **Mitigation Measure N-4,** consistent with the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR indicates that forecast development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment. New noise-sensitive land uses associated with the General Plan Update could be exposed to elevated noise levels from mobile sources along roadways. Implementation of the noise-related policies contained within the General Plan Update in addition to **Mitigation Measure N-2,** which includes an acoustic analysis to develop design recommendations, would reduce exterior noise compatibility impacts. While interior noise levels are required to achieve the 45 dBA CNEL interior noise limit of Title 24 and Title 25, exterior noise levels may still exceed the County noise land use compatibility criteria, despite exterior

noise attenuation (i.e., walls and/or berms). The General Plan Update EIR found impacts related to exterior noise compatibility due to increased traffic noise to be significant and unavoidable.

AHPO projects would generate traffic that could incrementally contribute to elevated noise levels from mobile sources along roadways. To the extent that projects exacerbate impacts such impacts would be considered significant. However, most projects would result in a less than significant contribution to traffic and therefore noise. Projects would be required to implement **Mitigation Measure N-2** and are required to achieve interior noise limits. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR indicates that construction activities associated with any individual development may occur near noise-sensitive receptors and, depending on the project type noise, disturbances may occur for prolonged periods of time. **Mitigation Measure N-1,** which requires installation of temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing non-essential idling of construction equipment to no more than five minutes, would reduce impacts associated with construction activities to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts construction noise would be significant and unavoidable.

AHPO projects could generate elevated noise levels from construction activities in some locations. Minor infrastructure repair and/or replacement of damaged units in mobilehome parks would result in negligible impacts. Projects would be subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The AHPO would not induce the development of industrial land uses, which tend to generate the most significant noise impacts. Additionally, the projects would be required to implement the General Plan's **Mitigation Measure N-1**, which would reduce impacts associated with construction activities to the extent feasible. Existing noise levels on sites where projects are most likely to occur is anticipated to be generally urban and in

proximity to transit. Noise impacts would be temporary and typical for construction activity, which is allowable in urban areas and therefore reasonably anticipated to occur. In addition, all stationary equipment (primarily anticipated to be HVAC equipment) would be required to comply with county regulations to ensure noise levels do not exceed ambient noise level standards. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

(f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR explains that development is required to be consistent with any applicable Airport Land Use Compatibility Plan (ALUCP) constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that development would not conflict with airport land use plans. Therefore, future development under the General Plan Update would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels (and would not exacerbate existing impacts).

AHPO projects would be required to comply with policies included in the Land Use Element and Noise Element of the General Plan to ensure that development would not conflict with airport land use plans. The AHPO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.13 POPULATION AND HOUSING

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concludes that the General Plan Update would directly result in population growth in the County. According to the General Plan Update EIR, estimated buildout population of Los Angeles County is 2,356,890 residents, which is expected to occur sometime after 2035. The mixture of land uses and densities anticipated for General Plan Update buildout can accommodate the growth projected by SCAG for 2035. The General Plan accommodates up to 659,409 housing units, and although buildout is not expected to occur by 2035, the opportunities for housing development provided in the General Plan Update are consistent with SCAG growth projections for 405,500 units by 2035. The housing and population growth allowed under the General Plan Update is consistent with SCAG projections and do not constitute a significant adverse environmental impact.

Under the General Plan Update, the Antelope Valley Planning Area goes from an existing jobs-housing ratio of 1.29 to 0.18 at buildout, which is very housing-rich. This would be considered a significant impact without mitigation. **Mitigation Measure PH-1,** which requires the County to identify land use changes to achieve a minimum jobs-housing ratio of 1.30 for the Antelope Valley Planning Area, would reduce potential impacts to population and housing to a level that is less than significant.

The AHPO requires replacement of lost affordable housing units. The AHPO is not anticipated to result in a substantial increase in population as it aims to maintain the existing affordable housing stock in the County. The effects of the AHPO on population growth would be minimal and well within the assumptions of the General Plan Update. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concluded that existing uses would continue even where new zoning and land use designations are proposed. None of the existing uses would be forced to be removed or relocated as a result of the project implementation. Compliance with the Housing Element would facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate the RHNA and maintain an inventory of housing opportunities sites. Therefore, the General Plan Update EIR found no significant impacts.

The AHPO requires replacement of lost affordable housing units. The purpose of the AHPO is to preserve the existing affordable housing stock in Los Angeles County. As described in the Project Description, the AHPO would work with other housing related ordinances under consideration (Inclusionary Housing, Density Bonus, Interim and Supportive, By Right Housing) to ensure that new residential projects set aside a percentage of units for affordable housing. The AHPO would not result in displacement of existing housing as it does not incentivize development. Rather, it seeks to alleviate the loss of affordable housing. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.14 PUBLIC SERVICES

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services :

- **Fire protection and emergency response**
- **Police Protection**
- **Schools**
- **Parks**
- **Other Public Facilities**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

Fire Protection and Emergency Response

The General Plan Update EIR concludes that buildout of the General Plan Update would introduce new structures, residents, and employees into the LACoFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel. To maintain or achieve acceptable travel time standards for fire protection, it is reasonably foreseeable that the provision of new or physically altered fire facilities would be required, which would have the potential to result in adverse environmental impacts. The General Plan Update EIR found that **Mitigation Measures PS-1, PS-2,** and **PS-3** would reduce potential impacts associated with fire protection. **Mitigation Measure PS-1** would require developers to pay developer fees to the LACoFD. **Mitigation Measure PS-2,** would ensure that each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. **Mitigation Measure PS-3** would require that a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area. These mitigation measures would reduce impacts to a less than significant level.

The replacement requirements of the AHPO do not apply within VHFHSZs. AHPO projects are generally anticipated to occur in urbanized areas zoned for residential uses. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by fire protection services. The AHPO does not increase development beyond what is already anticipated under buildout of the General Plan Update. Therefore, consistent with the General Plan Update EIR, implementation of **Mitigation Measures PS-1, PS-2**, and **PS-3** would reduce

any potential impacts associated with projects subject to the AHPO. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Law Enforcement

The General Plan Update EIR found that development would introduce new structures, residents, and employees into the LASD service boundaries, thereby increasing the requirement for law enforcement facilities and personnel. The majority of new development pursuant to the General Plan Update would occur in the Santa Clarita Valley and Antelope Valley Planning Areas. A mitigation fee has been adopted for the Santa Clarita Valley but at the time of the General Plan Update EIR, no mitigation fee had been adopted for the Antelope Valley Planning Area. The General Plan Update EIR found that **Mitigation Measure PS-4,** which requires that the County identify an implementation program to ensure adequate funding is available to provide law enforcement services within the Antelope Valley Planning Area, would reduce potential impacts associated with law enforcement to a less than significant level.

Similar to fire services, the projects subject to the AHPO are not expected to increase population, but rather to preserve the stock of affordable housing in the County. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by law enforcement. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

School Services

The General Plan Update EIR found that development would generate new students who would impact the school enrollment capacities of area schools. However, under state law, development projects are required to pay established school impact fees at the time of building permit issuance. The fees authorized for collection are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the increase in the demand for school facilities and services due to implementation of the General Plan Update would be adequately mitigated by the payment of associated fees. Impacts are less than significant.

The AHPO requires one-for-one replacement of any affordable housing units that are lost due to demolition or vacation as part of a project. The AHPO would not increase the overall population growth beyond what is anticipated in the General Plan Update EIR, nor would the ordinance substantially change the location of planned development. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by schools. Therefore, it is unlikely that additional schools would need to be constructed as a result of the

AHPO. Projects subject to the AHPO would be required to pay established impact fees at the time of building permit issuance, which would adequately mitigate any impacts generated to school service. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Library Services

The General Plan Update EIR found that the General Plan Update would generate additional population, increasing the service needs for the local libraries. According to County Library staff, increased tax revenues funding addresses only library operations, and because of uncertainty regarding General Fund contribution levels, it is not adequate to offset the impact of the project on the County Library's ability to construct new libraries and purchase new items (books, periodicals, audio cassettes, videos, etc.). Consequently, the tax revenues collected would not adequately cover all the costs of serving the project population. In order to minimize potentially adverse effects, the County devised library facilities mitigation fee programs, and future residential projects would be required to remit payment pursuant to the County-wide program to account for library-related construction and acquisition costs. The General Plan Update EIR found that requiring payment of the library facilities fee in effect at the time development occurs would mitigate impacts to a less than significant level.

Similar to school services, AHPO projects are not expected to increase population, but rather to preserve the stock of affordable housing in the County. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by libraries. Therefore, it is unlikely that additional libraries would need to be constructed as a result of the AHPO. Regardless, consistent with the General Plan Update, projects subject to the AHPO would be required to pay the County's established library facility fee at the time of building permit issuance, which would adequately mitigate any impacts generated to libraries. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.15 RECREATION

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR indicates that forecast development would generate additional residents that would increase the use of existing parks and recreational facilities but not to such an extent that substantial physical deterioration may occur or be accelerated.

According to the General Plan Parks and Recreation Element, all 11 Planning Areas face a deficit in local parkland totaling over 3,719 acres, and eight of the 11 Planning Areas have deficits in regional parkland. In 2016 the Department of Parks and Recreation completed the Countywide Parks and Recreation Needs Assessment which inventoried existing parks and recreational facilities in 188 study areas (including cities and unincorporated areas), quantified the need for additional park resources, and estimated the potential cost of meeting that need. Funding from a parcel tax approved in 2016 (Measure A) will be allocated locally by the Los Angeles County Regional Park and open Space District according to the population, square footage of improvement on parcels of land, and park need of each study area. Further, the General Plan Update EIR found that policies and programs would assure that funding for parkland acquisition would be proportional to increases in population and that impacts would be less than significant.

The AHPO would not induce population growth within the County; rather it would serve the forecast population by maintaining the number of units in the housing stock that are affordable. Development of off-site replacement units would be subject to locational limitations that would generally be expected to result in development in urban areas already served by parks and recreation facilities. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to including recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan EIR indicates that the anticipated increase in population would require the construction and expansion of new recreational facilities to serve the forecasted population growth in the unincorporated areas. Although the General Plan Update does not specifically site or plan recreational facilities, it would allow for the development of future recreational facilities, including parks, trails, athletic fields, and golf courses, within many of the land use designations, including residential and mixed-use.

Goals, policies, and actions in the General Plan Update including the creation of a County Parks and Recreation Master Plan, a trails program, and Parks Sustainability Program would guide the development of future recreational facilities. Existing federal, state, and local regulations would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails pursuant to buildout of the General Plan Update. Furthermore, subsequent environmental review would be required for development of park projects under existing regulations. Consequently, the General Plan Update EIR determined impacts would be less than significant.

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

3.16 TRANSPORTATION AND TRAFFIC

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

(a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

(b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concludes that buildout of the General Plan Update would impact levels of service on the existing roadway system. **Mitigation Measures T-1** through **T-5** would reduce these impacts. **Mitigation Measure T-1** would ensure projects are evaluated and traffic improvements identified to maintain minimum levels of service in accordance with the County's Traffic Impact Analysis Guidelines. **Mitigation Measure T-2** would require the county to implement over time objectives and policies contained within the General Plan Mobility Element. **Mitigation Measure T-3** would require the county to participate on a potential Congestion Mitigation Fee program. **Mitigation T-4** directs the County secure the funding needed to implement the future planned improvements. **Mitigation Measure T-5** directs the County to work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent to unincorporated areas. These mitigation measures would reduce impacts; however, the impacted locations are still considered to be significant. Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control (e.g., the County cannot undertake or require improvements outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans' approval). Therefore, the General Plan Update EIR determined impacts would be significant and unavoidable. As further described below, the mitigation measures included in the General Plan EIR would no longer be applicable, as they aim to reduce level of service impacts.

Since certification of the General Plan Update EIR, CEQA has been revised such that delay-based metrics including level of service (and associated mitigation measures) are no longer required. Instead CEQA now

requires that vehicle miles travelled (VMT) be the primary metric for evaluating transportation impacts. As of July 2020, the County of Los Angeles has updated their approach to traffic analyses and CEQA documentation to require consideration of VMT. The County's new transportation impact analysis requirements apply to environmental documents released for public review after July 1, 2020. Land use development projects will be analyzed on a project by project basis to determine if they comply with County transportation impact analysis guidelines.

If a land use development project is required to do a transportation impact analysis and does not achieve the applicable VMT reduction target for residential projects, mitigation options that reduce VMT must be explored.

Under Senate Bill (SB) 743 and the County's new transportation impact analysis guidelines, projects that further the State's affordable housing goals are presumed to have a less than significant impact on VMT. The AHPO was drafted to address the County's affordable housing needs. As such, a presumption of less than significant impact on transportation can be made and no further analysis is required.

AHPO requires replacement of lost affordable housing units and would preserve existing density in legally established mobilehome parks. The AHPO would not substantially change the location that development would occur; any replacement units constructed off-site are subject to locational requirements in the ordinance that are anticipated to result in such development being primarily located in urban areas in proximity to transit. The AHPO would not increase development beyond that evaluated in the General Plan Update EIR. In general, AHPO projects (other than mobilehome parks) are expected to be located in urbanized infill areas. Such areas are often but not exclusively in proximity to transit and/or walkable destinations. With respect to mobilehome parks, the proposed preservation of existing legally established parks that exceed current allowable density, would not increase VMT compared to existing conditions. The AHPO would not substantially change traffic impacts as compared to those that would occur under the General Plan Update; no new or greater impacts would occur.

(b) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update is not anticipated to result in the development of a new airport within Los Angeles County nor will it introduce new land uses that could prevent safety hazards to air traffic. Furthermore, policies of the General Plan Update are aimed at improving the compatibility between aviation facilities and their surroundings, encouraging greater multi-modal access to airports, and encouraging the development of a decentralized system of major airports. The General Plan Update EIR found impacts to be less than significant.

While the AHPO does not prohibit projects in the vicinity of an airport or flight path, these projects would be limited in number and therefore unlikely to significantly affect flight paths or air travel. Existing FAA regulations and the ALUCPs and are intended to identify and properly address potential airport hazards prior to implementation of specific projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(c) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR found that there would not be substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The General Plan Update promotes highways to be built to specific standards that have been set by the County. Hazards due to roadway design features will be evaluated on a project-by-project basis. All new highways and upgrades will be planned, designed, and built to County standards. The General Plan Update EIR found impacts to be less than significant.

Development associated with the AHPO is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The AHPO would not result in changes being made to the local roadways or impede public access on any public right-of-way. Therefore, implementation of the AHPO would have no impact related to design feature hazards. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impact would occur.

(d) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to inadequate emergency access?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR found that development would not result in inadequate emergency access. For projects of sufficient size, discretionary review of emergency access is evaluated on a project-by-project basis. The General Plan Update EIR found that buildout will enhance the capacity of the roadway system by upgrading roadways and intersections when necessary, ensure that the future dedication and acquisitions of roadways are based on projected demand, and implement the construction of paved crossover points through medians for emergency vehicles. Additionally, the General Plan Update EIR found that the General Plan Update will facilitate the consideration of the needs for emergency access in transportation planning. The County will ensure that new development is provided with adequate emergency and/or secondary access, including two points of ingress and egress for most subdivisions, require visible street name signage, and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. The General Plan Update EIR determined impacts to be less than significant.

The County has designated disaster routes as detailed in the Safety Element of the General Plan. Development, including that in accordance with the AHPO, could temporarily interfere with local and on-site emergency response. While road closures could occur as a result of construction activity, it is not anticipated that such closures would result in substantial delays to service providers.

Any lane closures must be approved by the County and they would not be approved if substantial delays could result. Typically, the County requires a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Compliance with access standards, including the Haul Route Monitoring Program would reduce potential impacts on roadways designated as haul routes and emergency response services during construction of individual projects. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

(e) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR found that the General Plan would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). The General Plan Update supports alternative modes of transportation, including walking and bicycling, to reduce total VMT. Additionally, the General Plan Update establishes several policies to ensure the safety and mobility of pedestrians and bicyclists. The County will provide safe and convenient access to safe transit, bikeways, and walkways, consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems, provide safe pedestrian connections across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations, adopt consistent standards for implementation of Americans with Disabilities Act requirements and in the development review process prioritize direct pedestrian access between building entrances, sidewalks and transit stops. The General Plan Update EIR determined impacts would be less than significant.

Development associated with the AHPO would be consistent with the underlying zoning for the site. Projects would continue to be consistent with General Plan Update policies. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

3.17 UTILITIES AND SERVICE SYSTEMS

Wastewater Treatment and Collection

(a) Does the AHPO Require Subsequent or Supplemental CEQA Documentation with respect to exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

According to the General Plan Update EIR, wastewater generation under the General Plan Update would not exceed wastewater treatment requirements of any of the four Regional Water Quality Control Boards having jurisdiction in Los Angeles County. General Plan Update implementation programs require Department of Regional Planning and the Department of Public Works (DPW) to jointly secure sources of funding and to set priorities for preparing studies to assess infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, the County will prepare a Capital Improvement Plan for each of the 11 Planning Areas. Each Capital Improvement Plan shall include a Waste Management Study and Stormwater System Study. General Plan Update policies also require the County to support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan Update encourages development, such as Transit Oriented Districts (TODs). Therefore, the General Plan Update EIR found that polices and required regulations would ensure impacts are less than significant.

Development associated with the AHPO would be well within the expected growth for the unincorporated County evaluated in the General Plan Update EIR and would not exceed RWQCB standards for treatment of wastewater or wastewater treatment capacity. Additionally, water conservation practices and compliance with best management practices (i.e., low flow toilets and automatic sinks), as well as Title 24 requirements, are likely to reduce wastewater generation. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

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

(b) Would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

(c) Would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

(e) Would result in a determination by the wastewater treatment provider which serves or may serve the project that is has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR explains that projects are required to pay connection fees to the LACSD, or corresponding types of fees to the City of Los Angeles Bureau of Sanitation, as applicable. Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Antelope Valley and

Santa Clarita Valley Planning Areas. The General Plan Update EIR determined there is sufficient wastewater treatment capacity in the remaining Planning Areas and impacts would be less than significant.

Wastewater. Development associated with the AHPO would not result in a net gain or loss of housing units; it would replace affordable units that are removed from the housing stock . Such development would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing sewer lines. Development in accordance with the AHPO would be required to comply with all applicable County regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Water. Water would be conveyed to projects along existing circulating water mains of varying sizes. Projects associated with the AHPO are anticipated to be generally located on land already developed with residential uses and served by water systems. The AHPO allows mobilehome parks to preserve their existing density, even if it exceeds the current allowable. Some mobilehome parks are connected to well water systems rather than the municipal system, but since no units would be added, no impacts would occur. Projects would be subject to Los Angeles County's Low Impact Development (LID) requirements, Los Angeles County's drought-tolerant landscaping requirements, and CALGreen construction requirements for low flow fixtures and other water conservation features. Development in accordance with the AHPO would be required to comply with water conservation requirements and ensure that adequate infrastructure exists. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Stormwater. Development associated with the AHPO would not result in a net gain or loss of housing units; it would simply replace affordable units that are removed from the housing stock. Such development would likely occur in urbanized areas zoned for residential development and would be expected to connect to the existing storm drains. Development in accordance with the AHPO would be required to comply with all applicable County regulations. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Water Supply and Distribution System

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

(d) Have sufficient water supplies available to serve the project from existing entitlements and resources, and new and/or expanded entitlements would be needed?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR concludes that adequate water supplies have been identified in the UWMP's for the County for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the General Plan Update, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. It is uncertain whether the water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035. **Mitigation Measures USS-1** through **USS-23** would lower these impacts, however the General Plan Update EIR finds that impacts would be significant and unavoidable.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. It is unlikely to result in projects that would not have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources. Developments constructed as a result of the project are likely to be located on land previously developed with residential and served by water systems that would provide will-serve letters verifying water supply. Projects would be subject to LID requirements, drought-tolerant landscaping requirements, and CALGreen construction requirements for low-flow fixtures and water conservation features. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Solid Waste

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

(f) Would be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?

(g) Would not comply with federal, state, and local statutes and regulations related to solid waste?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

The General Plan Update EIR finds that generation of solid waste would increase as the population increases with buildout of the General Plan Update. Correspondingly, there would be a need for additional landfill capacity and related support facilities. Both the forecasted net increase in solid waste generation by General Plan Update buildout and the forecast total solid waste generation in unincorporated County areas at General Plan Update buildout are well within the total residual per day daily disposal capacity of the nine landfills analyzed in the General Plan Update EIR. The General Plan Update EIR concludes that buildout would not require construction of new or expanded landfills, and impacts are found to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. It is unlikely to result in projects that would significantly impact landfill capacity. As discussed elsewhere in this Addendum, AHPO projects are primarily anticipated to be located in urban areas already served by existing landfills. Projects that obtain planning and building approvals would be consistent with solid waste regulations and would not be expected to generate substantial amounts of solid waste. The AHPO would not substantially change impacts as compared to those identified in the General Plan Update EIR; no new or greater impacts would occur.

Other Utilities

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

(h) Would increase demand for other public services or utilities?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	☐	☑
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	☐	☑
New or Substantially More Severe Significant Impacts Shown by New Information?	☐	☑
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	☐	☑

Electricity

The General Plan Update EIR concludes that growth in the unincorporated areas would result in additional demand for electricity service. Presently and for the foreseeable future, the national and regional supply of electrical energy is not in jeopardy. The acceleration of the approval and licensing process of additional state power plants will ensure an adequate supply of electricity for state consumers. The General Plan Update EIR forecasted the net increase in electricity demand due to buildout is about 9.9 billion kWh per year, or about 10,300 GWH per year, and is within Southern California Edison's (SCE's) demand forecast for its service area. Therefore, the General Plan Update EIR finds impacts to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. Inclusionary housing projects are likely to be located on land previously developed with residential uses and served by existing electrical utilities. Projects would also be subject to Los Angeles County's Green Building Program and CALGreen, which promote energy efficiency. The AHPO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Natural Gas

The General Plan Update EIR indicates that buildout would result in demand about 192 million therms per year, that is, 51 million cubic feet of natural gas per day. Forecasted natural gas demands due to the General Plan Update are within Southern California Gas Company's (SCGC's) estimated supplies; therefore the General Plan Update EIR found impacts on natural gas supplies to be less than significant.

The AHPO would not increase development beyond what is already anticipated under buildout of the General Plan Update. Inclusionary housing projects are likely to be located on land previously developed with residential or commercial uses and served by existing natural gas utilities. Projects would also be subject to Los Angeles County's Green Building Program and CALGreen, which promote energy efficiency.

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

3.18 CUMULATIVE IMPACTS

Cumulative projects are described in the **Chapter 1.0, Introduction**, **Section 1.7, Background and Planning History**.

Section 15130 of the *Guidelines* requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively significant. CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (*Guidelines* § 15355). "'Cumulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*Guidelines* § 15065(a)(3)).

The purpose of a cumulative analysis is to determine if several projects when evaluated together could result in a significant "cumulative" impact that would otherwise not be considered significant when projects are evaluated one at a time. If several projects considered together have the potential to result in a significant cumulative impact (that is not already identified as a significant project impact), the question becomes whether the project being analyzed would result in a "considerable" contribution to such a significant cumulative impact. Therefore, if a project results in a significant impact by itself, then its contribution to a cumulative impact is considerable. Mitigation measures that reduce project impacts would similarly reduce a project's contribution to cumulative impacts.

Cumulative impacts occur in one of two ways: 1) impacts from one project overlap with impacts from another project, 2) the other way that cumulative impacts occur is when a resource is of value to a broader community than just the immediate project vicinity, for example, impacts to a cultural or biological resource that has more than local significance, for example state or even national significance, impacts to such a resource would be cumulative with impacts to other resources of similar significance wherever they occur in the state or across the entire US.

The geographic area for evaluation of cumulative impacts is the area within which impacts of the General Plan Update, could overlap with impacts of other projects within the cities of Los Angeles County. The General Plan Update EIR evaluated cumulative projects and determined that during the planning period of the General Plan Update, cities in Los Angeles County are anticipated to grow by approximately 300,000 housing units and 1 million residents compared to existing conditions. This growth is in addition to development anticipated in the General Plan Update for unincorporated areas of the County – for 358,931 housing units and 1,290,479 residents (see **Chapter 2.0**).

The housing ordinances currently being prepared by Los Angeles County would work to facilitate the development analyzed in the General Plan Update EIR, with a focus on increasing housing options and affordability within the County. Although the housing ordinances have some common goals, they are not dependent on one another; each has independent utility.

The ordinances together are expected to result in the development of new housing that would be generally consistent at a County-level with the overall development assumptions analyzed in the General Plan Update EIR. As discussed throughout this addendum, the types of impacts that would generally be expected to occur are those that are common to housing projects, such as construction, and population related effects. The total number of units that are anticipated to be constructed as a result of the five ordinances would be well below the number evaluated in the General Plan Update EIR. The General Plan does not indicate how the projected units would get built, but rather provides the flexibility for the market to dictate how the total number of units would be ultimately constructed. The ordinances together would result in a small subset of the overall growth evaluated in the General Plan Update EIR and the impacts would be a similar subset of the impacts identified within the General Plan Update EIR. As such, even when combined, the ordinances would not result in a cumulatively considerable contribution to the impacts identified in the General Plan EIR, rather they are part of the overall development anticipated in the General Plan Update EIR and would facilitate that development rather than adding to it.

4.0 REFERENCES AND PREPARERS

4.1 REFERENCES

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

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

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

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