Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

May 12, 2011

TO: Pat Modugno, Chair
Esther L. Valadez, Vice Chair
David W. Louie, Commissioner
Harold V. Helsley, Commissioner
Curt Pedersen, Commissioner

FROM: Connie Chung, AICP, Supervising Regional Planner
Housing/General Plan Section

SUBJECT: MAY 25, 2011 – AGENDA ITEM # 7
PROJECT NO. R2010-00416
ADVANCE PLANNING CASE NO. 2010-000017
ENVIRONMENTAL ASSESSMENT NO. 201100009
AMENDMENT TO TITLE 21 (SUBDIVISION) AND TITLE 22 (PLANNING AND ZONING) OF THE LOS ANGELES COUNTY CODE RELATED TO REASONABLE ACCOMMODATION

SUMMARY

At the public hearing before your Commission on May 25, 2011, staff will respond to the issues and concerns that your Commission raised at the February 23, 2011 public hearing on the Draft Reasonable Accommodations Ordinance.

The Draft Reasonable Accommodation Ordinance implements a program of the 2008-2014 Los Angeles County Housing Element of the General Plan by amending Title 21 and Title 22 of the Los Angeles County Code. The proposed ordinance creates an administrative procedure for individuals with disabilities to request reasonable accommodation from land use and zoning standards or procedures, when those standards or procedures are a barrier to equal housing access. The Draft Ordinance applies to all the unincorporated areas of Los Angeles County, and to all regulations,

policies, practices and procedures regulated and administered by the Department of Regional Planning (Department).

ISSUES DISCUSSED AT FEBRUARY 23, 2011 PUBLIC HEARING

On February 23, 2011, your Commission conducted a public hearing to consider the Draft Reasonable Accommodation Ordinance and Negative Declaration. One member of the public testified in support of the draft ordinance. Your Commission asked staff to report back on the following issues:

1. The evaluation of a reasonable accommodation request on the basis of financial viability;
2. Sources to verify disability, such as a physician verification of disability, in addition to Department of Motor Vehicles disability documentation;
3. Mechanisms to track reasonable accommodations that have been granted;
4. The protection of confidential medical information when recording covenants; and
5. The disclosure of a reasonable accommodation that has been granted in a title search.

Staff has responded to these issues by making revisions to the draft ordinance **[Attachment 1]**, and providing further clarification, as discussed below.

Evaluation of Financial Viability

At the public hearing on February 23, 2011, the Commission raised concerns over how a reasonable accommodation would be evaluated based on financial need, and if it is an appropriate consideration in the review of requests for reasonable accommodations. As the nature of reasonable accommodations requests is broad in scope and as reasonable accommodation requests must be evaluated on a case-by-case basis, it is possible for a request to be based on financial viability. In such cases, the applicant must establish through the provision of financial information that the requested accommodation is necessary by showing a causal link between the proposed accommodation and how it provides an equal opportunity for housing opportunities for the disabled applicant. However, the request would also be reviewed against the other reasonable accommodation findings, including that the request shall not fundamentally alter the nature of the land use and zoning program of the County. Although this nexus has been contemplated by the courts, there is no published case in the Ninth Circuit of the federal appellate courts that has found that an accommodation solely on the basis of financial viability to be necessary under the Fair Housing Act.

Verification of Disability

The second issue that your Commission raised at the public hearing on February 23, 2011 relates to the sources that staff would use to verify the disability status of the applicant. To address this concern, staff will add to the guidelines for processing reasonable accommodation requests and application materials that a verification of disability from an appropriate healthcare or rehabilitation professional is required, in addition to any government issued identification.

Mechanisms to Track Reasonable Accommodations

Another issue that your Commission raised at the public hearing on February 23, 2011 relates to mechanisms to track reasonable accommodations that have been granted. To address this concern, staff revised the draft ordinance to clarify the covenant provisions. Section 22.56.3090 of the draft ordinance now clearly specifies that there are two types of covenants. The first type of covenant is required when the accommodation is permanent and physically integrated into the property, and infeasible to remove when the accommodation is no longer necessary. The purpose of requiring this type of covenant is to disclose to future buyers that there is an accommodation associated with the property that may continue as a legal non-conforming use. The second type of covenant is required when the accommodation can be removed when no longer necessary. The purpose of requiring the second type of covenant is to disclose to future buyers that the property is no longer in compliance with the Reasonable Accommodation Ordinance, and that it is the property owner's responsibility to remove or discontinue the accommodation.

The covenant compels a property owner to bring his/her property up to current zoning standards, upon sale or remodel, either through obtaining permits or removing the unnecessary accommodation. Additionally, the draft ordinance, as revised, requires that a property owner record a termination or release of the associated covenant.

It is important to note that a covenant would not be required in all cases. For example, if an applicant for a reasonable accommodation requests a procedural exception, a covenant would not need to be recorded against any real property.

Staff has prepared two sample covenants to illustrate when a covenant would specify that the accommodation be removed versus when this provision would not apply **[Attachment 3]**. Furthermore, to address this concern, staff will include in the guidelines for processing reasonable accommodation requests, that the applicant should notify the Department when an accommodation is no longer necessary.

Protection of Confidential Information

Another issue that your Commission raised at the public hearing on February 23, 2011 is the disclosure of confidential medical information in the covenants, which are publicly available. To address this concern, staff revised the draft ordinance to no longer require the recordation of the findings. The covenant will no longer state the basis for the request, i.e. the applicant's disability. To ensure that the accommodation is provided to the intended recipient, the covenant will reference a reasonable accommodation case number associated with a file in which the findings and documentation are maintained and protected from public review.

Disclosure of Reasonable Accommodations in Title Search

The final issue raised by your Commission at the public hearing on February 23, 2011 relates to the disclosure of covenants to potential buyers of properties with a reasonable accommodation. Staff consulted with two local title companies, First American Title Company and Lawyers Title of Los Angeles, as well as with Department staff that regularly conduct title research. Each source confirmed that covenants placed on record for the benefit of the County, such as those required by the draft ordinance, would be identified in a standard title search.

ADDITIONAL CHANGES

To ensure consistency with the zoning code and to facilitate its implementation, staff made additional revisions to the draft ordinance. The draft ordinance, as revised, specifies that if an accommodation is not used within a specified time frame, it is null and void, unless a limited extension is granted. The terms of the expiration are the same as those for a conditional use permit. In addition, the draft ordinance, as revised, includes an effective date, which is thirty (30) days after the mailing date of the notice of determination on a request for reasonable accommodation.

ENVIRONMENTAL DOCUMENTATION

Staff has prepared a Draft Initial Study and Negative Declaration for the proposed ordinance in compliance with the California Environmental Quality Act (CEQA) and the Environmental Document Reporting Procedures and Guidelines of the County of Los Angeles. Staff consulted on the Draft Initial Study and Negative Declaration with the County Department of Public Works, Department of Public Health, Fire Department, Sheriff's Department, the State Housing and Community Development Department, and the Governor's Office of Planning and Research. Staff received a letter from the Sheriff's Department on February 17, 2011, and from the Fire Department on March 21,

2011 **[Attachment 4 and 5]**. In both letters, the respective County Departments indicate that they do not have any comments on the draft environmental documents.

STAFF RECOMMENDATION

Staff recommends that the Regional Planning Commission approve the proposed ordinance as revised for recommendation to the Board of Supervisors ("Board") for its consideration and approval, and direct staff to transmit the draft ordinance, as revised, to the Board for their consideration at a public hearing, by approving a resolution to that effect in the form of the attached draft resolution **[Attachment 6].**

RECOMMENDED MOTION

I move that the Regional Planning Commission close the public hearing and find that the Negative Declaration reflects the independent judgment and analysis of the County, and approve the resolution recommending that the Board of Supervisors hold a public hearing to consider and adopt the Negative Declaration and find that the draft ordinance, as revised, since the February 23, 2011 public hearing, will not have a significant effect on the environment.

I also move that the Regional Planning Commission approve the resolution recommending that the Board of Supervisors hold a public hearing to consider and adopt the draft ordinance, as revised, and determine that it is compatible with and supports the goals and policies of the Los Angeles County General Plan.

Should you have any questions about this memo, please contact Gretchen Siemers in the Housing/General Plan Section at gsiemers@planning.lacounty.gov or (213) 974-6417.

JS:CC:GS

Cc: Richard J. Bruckner, Director of Planning

Attachments:

1. Revised Draft Reasonable Accommodation Ordinance; April 26, 2011
2. Sample Covenants
3. Draft Initial Study and Negative Declaration; January 19, 2011
4. Comment letter from Sheriff's Department; February 17, 2011
5. Comment letter from Fire Department; March 21, 2011
6. Draft Resolution

ORDINANCE NO. _____

An ordinance amending Title 21—Subdivisions—and Title 22—Planning and Zoning—of the Los Angeles County Code establishing procedures for individuals with disabilities to request reasonable accommodations from planning and land use regulations to obtain equal opportunity to use and enjoy a residential use.

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

SECTION 1. Section 21.52.010 is hereby amended as follows:

21.52.010 Modification or waiver of provisions authorized when.

…

D. The director or the advisory agency may make modifications to regulations contained in this Title 21 pertaining to the granting of a reasonable accommodation, as provided for in Title 22.

SECTION 2. Section 22.08.040 is hereby amended to read as follows:

22.08.040 D.

…

~~"Disability" means a condition which renders an individual unable to engage in normal activities by reason of a medically determinable physical or mental impairment which can be expected to last for not less than 12 months.~~

SECTION 3. Part 19 of Chapter 22.56 is hereby added to read as follows:

Part 19 REQUESTS FOR REASONABLE ACCOMMODATION

22.56.3000 Purpose.
22.56.3010 Applicability.
22.56.3020 Definitions.
22.56.3030 Application.
22.56.3040 Findings.

22.56.3050 Commission review where concurrent.
22.56.3060 Notice of determination.
22.56.3070 Effective date.
22.56.3080 Expiration of Reasonable Accommodation.
22.56.3090 Covenant.
22.56.3100 Appeals.

22.56.3000 Purpose.

The purpose is to provide a procedure for individuals with disabilities to request reasonable accommodation, as provided by the federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act (the Acts), as those regulations are amended from time to time.

22.56.3010 Applicability.

The provisions of this Part 19 shall apply to all regulations, policies, procedures and standards, regulated by the Department of Regional Planning of the County of Los Angeles.

22.56.3020 Definitions.

"The Acts" means the federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act, as those regulations are amended from time to time.

"Individual with a disability" as defined in California Government Code Sections 12900-12996 and the regulations promulgated thereunder.

"Reasonable accommodation" is a waiver or modification to regulations, policies, procedures and standards that may be reasonable and necessary for a person with a disability to have an equal opportunity to use and enjoy a residential use.

"Residential use" means any dwelling as defined by 42 U.S.C. 3602(b), as may be amended from time to time.

22.56.3030 Application—Filing.

A. Any individual with a disability, someone acting on his or her behalf, or a provider or developer of housing for individuals with disabilities, desiring to obtain accommodation in accordance with this Part 19 shall file an application with the director.

B. A request for accommodation shall contain the following information:

1. Name and address of the applicant and of all persons owning any or all of the subject property.

2. Evidence that the applicant is one of the following;

a. Is the owner of the subject property, or

b. Has the written permission of the owner or owners to make such request.

3. Location of the subject property, including address (or vicinity) and Assessor's parcel number(s).

4. Legal description of the subject property.

5. Description of the current use of the property.

6.The specific regulations, policies, procedures and/or standards that are requested to be waived or modified.

7. A statement setting forth the basis for the request, including verifiable documentation of disability status.

C. The director may request additional information as necessary that complies with the Acts and the privacy rights of the individual with a disability.

22.56.3040 Findings.

A. The director shall grant a request for accommodation where all of the following are established:

1. The accommodation requested is intended to be used by an individual with a disability who resides or will reside on the property;

2. The requested accommodation is necessary to afford an individual with a disability equal opportunity to use and enjoy a residential use;

3. The requested accommodation will not impose an undue financial or administrative burden on the County; and

4. The requested accommodation will not require a fundamental alteration in the nature of the land use and zoning program of the County.

22.56.3050 Hearing officer or commission review where concurrent.

When a request for accommodation is filed in conjunction with a permit, variance or any other discretionary land use action as provided by Title 21 and/or Title 22, the hearing officer or commission shall grant a request for a reasonable accommodation concurrently with such

permit, variance or other discretionary land use action in accordance with the required findings pursuant to 22.56.3040.

22.56.3060 Notice of determination.

A. The director, hearing officer or commission shall notify the applicant by mail of the action taken on a request for accommodation.

1. Notices of determination not considered pursuant to 22.56.3050 shall be issued within 30 days of the date the application is deemed complete.

B. A copy of the notice of determination shall be provided to abutting owners of subject the property.

C. The notice of determination shall give notice of the right to appeal, as set forth in Section 22.56.3080.

22.56.3070 Effective date.

The director's determination on a request for reasonable accommodation becomes final 30 days after mailing the notice of determination.

22.56.3080 Expiration of reasonable accommodation.

A. A reasonable accommodation which is not used within the time specified in such notice of determination or, if no time is specified, within two years after the granting of the reasonable accommodation, becomes null, void and of no effect at all:

1. That in all cases the hearing officer may extend such time for a period of not to exceed one year, provided an application requesting such extension is filed prior to such expiration date.

2. That, in the case of a reasonable accommodation filed and heard concurrently with a land division, the hearing officer shall specify the limits and extensions to be concurrent and consistent with those of the land division.

B. A reasonable accommodation shall be considered used, within the intent of this section, when construction, development or use authorized by such reasonable accommodation has commenced that would be prohibited in the zone if no accommodation had been granted.

C. A reasonable accommodation granted by action of the director or the commission, shall automatically cease to be of any force and effect if the use for which such accommodation was granted has ceased or has been suspended for a consecutive period of two or more years.

22.56.3090 Covenant.

A. The director may require the applicant to record, in the office of the county recorder, an agreement that the reasonable accommodation granted will be maintained in accordance with this Part as a covenant running with the land for the benefit of the County of Los Angeles. The covenant shall also declare that any violation thereof shall be subject to the enforcement procedures of Part 6 of Chapter 22.60.

B. The director may require a covenant, if:

1. The accommodation is physically integrated on the property and cannot feasibly be removed or altered, and the structure would otherwise be subject to Part 10 of 22.56; or

2. The accommodation is temporary and required to be discontinued if no longer maintained in compliance with this Part.

C. The director may terminate a covenant after making written findings that the lot or parcel of land is in compliance with all applicable land use and zoning regulations.

D. The property owner is required to record the termination or release of any covenant provided by this section.

22.56.3100 Appeals.

A. An appeal shall be made in writing, pursuant to the procedures established in Part 5 of 22.60.

B. All determinations on the appeal shall address and be based upon the same findings required in accordance with 22.56.3040.

C. Decisions on an appeal shall be effective on the date of decision and no further administrative appeals may be heard, except when provided by 22.56.3050.

RECORDING REQUESTED BY:

Name:
Street:
City:

COVENANT AND AGREEMENT FOR REASONABLE ACCOMMODATION

The undersigned hereby certifies that (I am / we are) the Owner(s) of real property ("property") located in the unincorporated portion of the County of Los Angeles, State of California described as [*type legal description or for lengthy legal "See attached Exhibit A"*].

The above mentioned property was granted the following Reasonable Accommodation [*type description of accommodation*]

located at [*type street address or general location of Property*]

The above reasonable accommodation is granted solely for the individual(s) named in the grant per **Reasonable Accommodation** [*type permit number*]. The Owner(s) agree(s) that the Reasonable Accommodation will be maintained in accordance with Part 19 of Chapter 22.56 of the Los Angeles County Zoning Code (Title 22), and ***therefore be discontinued if no longer necessary or no longer associated with the individual named in the Reasonable Accommodation*** [*type permit number*]. The Owner(s) also acknowledge(s) that any violation thereof shall be subject to the enforcement procedures of Part 6 of Chapter 22.60 of the Los Angeles County Zoning Code (Title 22).This Covenant and Agreement shall run with all of the above described land and shall be binding on the Owner(s), (his) (her) (their) heirs, successors and assigns or shall

SAMPLE

continue in effect for the benefit of the county until released by the authority of the Director of Planning of the County of Los Angeles upon submittal of request, applicable fees and evidence that the Covenant and Agreement is no longer required by law.

The Owner(s) execute(s) this instrument on the [*type number of day*] _____
day of [*type month, year*] _____ .

OWNER(S)

By _____

(Name and position)

By _____

(Name and position)

By _____

(Name and position)

(Notary to be attached)

SAMPLE

RECORDING REQUESTED BY:

Name:
Street:
City:

COVENANT AND AGREEMENT FOR REASONABLE ACCOMMODATION

The undersigned hereby certifies that (I am / we are) the Owner(s) of real property ("property") located in the unincorporated portion of the County of Los Angeles, State of California described as [*type legal description or for lengthy legal "See attached Exhibit A"*].

_____
_____
_____
_____

The above mentioned property was granted the following Reasonable Accommodation ("accommodation") [*type description of accommodation*]

_____
_____
_____
_____

located at [*type street address or general location of Property*]

_____
_____
_____
_____

Per Reasonable Accommodation Permit [*permit number*] and Part 19 of Chapter 22.56 of the Los Angeles County Zoning Code (Title 22), ***the director has determined that the above accommodation is physically integrated into the property and shall run with the land.***

The Owner(s) agree(s) that the above accommodation will be maintained in accordance with Part 19 of Chapter 22.56 of the Los Angeles County Zoning Code (Title 22). The Owner(s) also acknowledge(s) that any violation thereof shall be subject to the enforcement procedures of Part 6 of Chapter 22.60 of the Los Angeles County Zoning Code (Title 22).This Covenant and Agreement shall run with all of the above described land and shall be binding on the Owner(s),

SAMPLE

(his) (her) (their) heirs, successors and assigns or shall continue in effect for the benefit of the county until released by the authority of the Director of Planning of the County of Los Angeles upon submittal of request, applicable fees and evidence that the Covenant and Agreement is no longer required by law.

The Owner(s) execute(s) this instrument on the [*type number of day*] _____ day of [*type month, year*] _____.

OWNER(S)

By _____

(Name and position)

By _____

(Name and position)

By _____

(Name and position)

(Notary to be attached)

SAMPLE

DRAFT January 19, 2011

STAFF USE ONLY

PROJECT NUMBER:
R2010-00416
CASE: RADV
T2010-000017

*** * * * DRAFT INITIAL STUDY * * * ***

COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING

GENERAL INFORMATION

I.A. Map Date: *N/A* Staff Member: Gretchen Siemers

Thomas Guide: *N/A* USGS Quad: *N/A*

Location: *Countywide*

Description of Project: A proposed ordinance amending Title 22 (Planning and Zoning) and Title 21 (Subdivisions) of the Los Angeles County Code related to reasonable accommodations for persons with disabilities. The proposed ordinance creates a discretionary administrative procedure for reasonable accommodation, which is defined as a waiver or modification to regulations, policies, procedures and standards that may be reasonable and necessary for a person with a disability to have an equal opportunity to use and enjoy a residential use, consistent with state and federal fair housing laws. The ordinance applies to all the unincorporated areas of Los Angeles County.

Gross Area: *N/A*

Environmental Setting: Countywide – Unincorporated Areas

Zoning: Requests for *reasonable accommodation* are permitted in conjunction with any residential use.

General Plan: Countywide

Community/Area Wide Plan: Countywide

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Major projects in area:

Project Number	Description & Status
N/A	

NOTE: For EIRs, above projects are not sufficient for cumulative analysis.

REVIEWING AGENCIES

Responsible Agencies

- ☒ None
- ☐ Regional Water Quality Control Board
  - ☐ Los Angeles Region
  - ☐ Lahontan Region
- ☐ Coastal Commission
- ☐ Army Corps of Engineers
- ☐ _____

Trustee Agencies

- ☐ None
- ☐ State Fish and Game
- ☐ State Parks
- ☐ _____
- ☐ _____

Special Reviewing Agencies

- ☐ None
- ☐ Santa Monica Mountains Conservancy
- ☐ National Parks
- ☐ National Forest
- ☐ Edwards Air Force Base
- ☐ Resource Conservation District of the Santa Monica Mtns.
- ☒ *State of California Housing and Community Development Department*
- ☒ *State of California Office of Planning and Research*

Regional Significance

- ☐ None
- ☐ SCAG Criteria
- ☐ Air Quality
- ☐ Water Resources
- ☐ Santa Monica Mtns Area

County Reviewing Agencies

- ☒ Subdivision Committee
- ☒ DPW: *Traffic and Lighting, Geotechnical and Materials Engineering, Grading and Drainage, Waterworks and Sewer Maintenance.*
- ☒ Public Health: *Environmental Health; Land Use Program*
- ☒ *Fire Department*
- ☒ *Public Library*
- ☒ *Sheriff*

DRAFT January 19, 2011

IMPACT ANALYSIS MATRIX

CATEGORY	FACTOR	Pg	ANALYSIS SUMMARY (See individual pages for details)			
			Less than Significant Impact/No Impact	Less than Significant Impact with Project Mitigation	Potentially Significant Impact	Potential Concern
HAZARDS	1. Geotechnical	5	☒	☐	☐	
	2. Flood	7	☒	☐	☐	
	3. Fire	9	☒	☐	☐	
	4. Noise	[illegible]	☒	☐	☐	
RESOURCES	1. Water Quality	11	☒	☐	☐	
	2. Air Quality	13	☒	☐	☐	
	3. Biota	14	☒	☐	☐	
	4. Cultural Resources	16	☒	☐	☐	
	5. Mineral Resources	17	☒	☐	☐	
	6. Agriculture Resources	18	☒	☐	☐	
	7. Visual Qualities	19	☒	☐	☐	
SERVICES	1. Traffic/Access	20	☒	☐	☐	
	2. Sewage Disposal	21	☒	☐	☐	
	3. Education	22	☒	☐	☐	
	4. Fire/Sheriff	23	☒	☐	☐	
	5. Utilities	24	☒	☐	☐	
OTHER	1. General	25	☒	☐	☐	
	2. Environmental Safety	26	☒	☐	☐	
	3. Land Use	28	☒	☐	☐	
	4. Pop./Hous./Emp./Rec.	29	☒	☐	☐	
	Mandatory Findings	30	☒	☐	☐	

DRAFT January 19, 2011

Environmental Finding:

FINAL DETERMINATION: On the basis of this Initial Study, the Department of Regional Planning finds that this project qualifies for the following environmental document:

☒ NEGATIVE DECLARATION, inasmuch as the proposed project will not have a significant effect on the environment.

An Initial Study was prepared on this project in compliance with the State CEQA Guidelines and the environmental reporting procedures of the County of Los Angeles. It was determined that this project will not exceed the established threshold criteria for any environmental/service factor and, as a result, will not have a significant effect on the physical environment.

☐ MITIGATED NEGATIVE DECLARATION, inasmuch as the changes required for the project will reduce impacts to insignificant levels (see attached discussion and/or conditions).

An Initial Study was prepared on this project in compliance with the State CEQA Guidelines and the environmental reporting procedures of the County of Los Angeles. It was originally determined that the proposed project may exceed established threshold criteria. The applicant has agreed to modification of the project so that it can now be determined that the project will not have a significant effect on the physical environment. The modification to mitigate this impact(s) is identified on the Project Changes/Conditions Form included as part of this Initial Study.

☐ ENVIRONMENTAL IMPACT REPORT*, inasmuch as there is substantial evidence that the project may have a significant impact due to factors listed above as "significant."

☐ At least one factor has been adequately analyzed in an earlier document pursuant to legal standards, and has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets (see attached Form DRP/IA 101). The EIR is required to analyze only the factors not previously addressed.

Reviewed by: *Gretchen Siemers, Regional Planning Assistant II, Housing Section* Date: *2/10/2011*

Approved by: *Connie Chung, AICP, Supervising Regional Planner, Housing Section* Date: *2/10/2011*

DRAFT January 19, 2011

HAZARDS - 1. Geotechnical

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☒	☐	☐	Is the project site located in an active or potentially active fault zone, Seismic Hazards Zone, or Alquist-Priolo Earthquake Fault Zone?

The proposed ordinance would not be expected to result in impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known active fault zone, seismic hazard zone or Alquist-Priolo Earthquake Fault Zone. Although all of the unincorporated areas of Los Angeles County lie within a general region of known fault zones and seismic activity (per California Seismic Hazards maps, California Special Study Zones maps, Los Angeles County General Plan Safety Element Plate 1), the project is a discretionary procedure for requests for *reasonable accommodation* that may result in a modification to a policy, procedure, or standard in the General Plan and/or Zoning Code.

Future requests for *reasonable accommodation* are subject to the County's building code and may require the appropriate approvals from the Los Angeles County Department of Public Works, including a geotechnical report if located in a fault zone. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within an area with an active or potentially active fault zone, Seismic Hazards Zone, or Alquist-Priolo Earthquake Fault Zone, the project-level CEQA review would address the impacts, and mitigation, as defined in Public Resources Code Section 2693(c), may be required. Furthermore, future requests for reasonable accommodation are subject to the state law, which prohibits structures for human occupancy within 50 feet of an active fault trace, with the exception of individual single family residences and mobilehomes.

Nonetheless, the existence of known fault zones creates the potential for seismic hazards. The degree of seismic ground shaking would depend on the characteristics of the earthquake, including the generating fault, the distance to the epicenter, the magnitude of the earthquake, and the site-specific geologic conditions. Compliance with the California Building Code (CBC) includes the incorporation of seismic safety features, such as proper building footings and proper structure, and a registered engineer would review the project plans to ensure that all required earthquake safety measures are incorporated and the building design conforms to the CBS requirements. Such compliance with existing standards and requirements would ensure an adequate level of protection from seismic hazards. In addition, the proposed ordinance would not be expected to result in strong seismic ground shaking or associated impacts. Therefore, there would be no expected impacts from exposing people or structures to potential substantial adverse effects involving strong seismic ground shaking. Furthermore, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages, prohibits and regulates residential uses in active or potentially active fault zones, seismic hazards zones, and Alquist-Priolo Earthquake Fault Zones, it is unlikely that a reasonable accommodation will locate a project within any of these areas, or create significant impacts.

b.	☐	☐	☒	Is the project site located in an area containing a major landslide(s)?

The proposed ordinance would not be expected to result in impacts from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving major landslides. While there are some unincorporated areas of Los Angeles County that contain landslides and are not suitable for development (per Los Angeles County General Plan Safety Element Plate 5), the proposed ordinance is a discretionary procedure and would not likely cause development to locate in such areas. Future requests for *reasonable accommodation* are subject to the County's building code and may require the appropriate approvals from the Los

Angeles County Department of Public Works. In addition, all future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within an area with high slope instability, project-level CEQA review would address the impacts, and mitigation, as defined in Public Resources Code Section 2693(c), would be required. However, a request for reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages and regulates residential uses in major landslide areas, it is unlikely that a reasonable accommodation, will locate a project within such an area, or create significant impacts.

c. ☐ ☐ ☒ Is the project site located in an area having high slope instability?

The proposed ordinance would not be expected to result in impacts to geology and soils in relation to location 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 or collapse. Although there are some unincorporated areas of Los Angeles County that have high slope instability and are not suitable for development, the project is a discretionary procedure and would not likely cause impacts. Future requests for *reasonable accommodation* are subject to the County's building code and may require the appropriate approvals from the Los Angeles County Department of Public Works. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within an area with high slope instability, project-level CEQA review would address the impacts, and mitigation, as defined in Public Resources Code Section 2693(c), would be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, and because the General Plan discourages development in, and regulates areas with high slope instability, through such mechanisms as the County's Hillside Management provisions, it is unlikely that a reasonable accommodation will locate a project within such an area, or create significant impacts.

d. ☐ ☐ ☒ Is the project site subject to high subsidence, high groundwater level, liquefaction, or hydrocompaction?

Although there are some unincorporated areas of Los Angeles County that contain high subsidence, high groundwater level, liquefaction, or hydrocompaction, and may not be suitable for development (per Los Angeles County General Plan Safety Element Plates 3 and 4), the proposed ordinance would not be expected to result in impacts from exposing people or structures to potential adverse effects, including the risk of loss, injury or death involving high subsidence, high groundwater level, liquefaction, or hydrocompaction. Future requests for *reasonable accommodation* are subject to the County's building code and may require the appropriate approvals from the Los Angeles County Department of Public Works. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within an area where historic occurrence of liquefaction, or local geological, geotechnical, and groundwater conditions, indicate a potential for permanent ground displacements, project-level CEQA review would address the impacts, and mitigation as defined in Public Resources Code Section 2693(c), would be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan regulates areas subject to high subsidence, high groundwater level, liquefaction and hydrocompaction, a reasonable accommodation is not likely to locate a project in any of these areas or create significant impacts.

e. ☐ ☐ ☒ Is the proposed project considered a sensitive use (school, hospital, public assembly site) located in close proximity to a significant geotechnical hazard?

The proposed ordinance would not be expected to result in the location of sensitive uses in close proximity to a significant geologic hazard. Reasonable accommodations are associated with residential uses, which are considered sensitive uses. A reasonable accommodation cannot

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fundamentally alter the nature of the land use and zoning program and as the General Plan regulates geotechnical hazards, a reasonable accommodation is not likely to locate a project in proximity to a significant geotechnical hazards, or create significant impacts. In addition, future requests for *reasonable accommodation* are subject to the County's building code and may require the appropriate approvals from the Los Angeles County Department of Public Works. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant geotechnical hazard, project-level CEQA review would address the impacts, and mitigation as defined in Public Resources Code Section 2693(c), may be required.

f. ☐ ☐ ☒ Will the project entail substantial grading and/or alteration of topography including slopes of more than 25%?

The proposed ordinance would not be expected to result in significant impacts from development that entails substantial grading and/or alteration of topography. There are some unincorporated areas of Los Angeles County that have high slope instability and are not suitable for development. Future requests for *reasonable accommodation* are subject to the County's building code and may require the appropriate approvals from the Los Angeles County Department of Public Works. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would entail substantial grading and/or alteration of topography including slopes of more than 25 percent, project-level CEQA review would address the impacts, and mitigation as defined in Public Resources Code Section 2693(c), may be required. Furthermore, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages and regulates substantial grading and/or alteration of topography, including the County's Hillside Management provisions, a reasonable accommodation is not likely to result in substantial grading and/or alteration of topography, or create significant impacts.

g. ☐ ☐ ☒ Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

The proposed ordinance would not be expected to result in impacts from developments located on expansive soil. While there are some unincorporated areas of Los Angeles County that contain expansive soil, the proposed ordinance creates a discretionary procedure and would not be expected to result in impacts to geology and soils in relation to location on expansive soil creating substantial risks to life or property. Future requests for *reasonable accommodation* are subject to the County's building code and may require the appropriate approvals from the Los Angeles County Department of Public Works. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, project-level CEQA review would address the impacts, and mitigation as defined in Public Resources Code Section 2693(c), may be required. Furthermore, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages risks to life and property, a reasonable accommodation in and of itself would not locate a project on expansive, or create significant impacts.

h. ☐ ☐ ☐ Other factors? _____

STANDARD CODE REQUIREMENTS

☒ Building Ordinance No. 2225 C Sections 308B, 309, 310 and 311 and Chapters 29 and 70.

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☐ **MITIGATION MEASURES** / ☒ **OTHER CONSIDERATIONS**
☐ Lot Size ☐ Project Design ☒ Approval of Geotechnical Report by DPW

The above analysis is undertaken to determine if the proposed ordinance may have a significant impact to geology and soils, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to geology and soils in the area subject to the proposed ordinance was evaluated with regard to the California Geological Survey Seismic Hazard Zone Report for the U.S. Geological Survey (USGS) topographic quadrangle maps; the County of Los Angeles General Plan; and most recent Alquist-Priolo Earthquake Fault Zoning (APEFZ) Maps.

The analysis concludes that the proposed ordinance will not result in significant impacts on geology and soils that would create hazards from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).
>
> *The ordinance has limited applicability*. A request for a *reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.
>
> *There are existing measures in place that limit any potential impacts.* All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant geotechnical hazard, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

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Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be impacted by, **geotechnical** factors?
☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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HAZARDS - 2. Flood

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Is a major drainage course, as identified on USGS quad sheets by a dashed line, located on the project site?

While, there are major drainage courses located within the unincorporated areas of Los Angeles County (per USGS maps), the proposed ordinance would not be expected to result in impacts to major drainage courses in a manner that would result in flooding on site or off site. The project is a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and/or Zoning Code. Future requests for *reasonable accommodation* are subject to the County's building code and floodway provisions, as applicable, and may require the appropriate approvals from the Los Angeles County Department of Public Works. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within a major drainage course, the project-level CEQA review would address the impacts, and mitigation may be required. Furthermore, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the siting of projects on major drainage courses, a reasonable accommodation is not likely to locate a project in such an area, or create significant impacts.

b.	☐	☐	☒	Is the project site located within or does it contain a floodway, floodplain, or designated flood hazard zone?

The proposed ordinance would not be expected to result in development being located within or be located in areas that contain a floodway, floodplain or designated flood hazard zone. There are some unincorporated areas of Los Angeles County that contain a floodway, floodplain, or designated flood hazard zone (per Los Angeles County General Plan Safety Element Plate 6). Future requests for *reasonable accommodation* are subject to the County's building code and floodway provisions, as applicable, and may require the appropriate approvals from the Los Angeles County Department of Public Works, as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. Furthermore, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan prohibits and discourages residential developments in floodways, floodplains, and flood zones, a reasonable accommodation is not likely to locate a project within any of these areas, or create significant impacts.

c.	☐		☒	Is the project site located in or subject to high mudflow conditions?

The proposed ordinance would not be expected to result in development being located in or subject to high mudflow conditions. While there are some unincorporated areas of Los Angeles County that are subject to high mudflow conditions, the proposed project is a discretionary procedure and would not likely result in significant impacts. Future requests for *reasonable accommodation* are subject to the County's building code and floodway provisions, as applicable, and may require the appropriate approvals from the Los Angeles County Department of Public Works, as applicable. In addition, all future requests for *reasonable*

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accommodation are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan and the County Code discourage residential developments in areas in or subject to high mudflow conditions, a reasonable accommodation is not likely to locate a project in such areas, or create significant impacts.

d. ☐ ☐ ☒ Could the project contribute or be subject to high erosion and debris deposition from run off?

Although there are some portions of unincorporated Los Angeles County that are subject to high erosion and debris disposition from runoff, the proposed ordinance would not be expected to result in impacts to hydrology and water quality in relation to alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. Future requests for *reasonable accommodation* are subject to the County's building code and floodway provisions, as applicable, and may require the appropriate approvals from the Los Angeles County Department of Public Works, as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. Furthermore, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages development in areas with flood hazards, a reasonable accommodation is not likely to located a project in such an area or create significant impacts.

e. ☐ ☐ ☒ Would the project substantially alter the existing drainage pattern of the site or area?

The proposed ordinance would not be expected to substantially alter the existing drainage pattern of a site or area subject to a request for reasonable accommodation. While there are some areas within unincorporated Los Angeles County where existing drainage patterns may be altered, the proposed project is a discretionary procedure and would not likely cause such impacts. Future requests for *reasonable accommodation* are subject to the County's building code and floodway provisions, as applicable, and may require the appropriate approvals from the Los Angeles County Department of Public Works, as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with altering drainage patterns, a reasonable accommodation is not likely to facilitate a project that would substantially alter the existing drainage pattern of the site area

f. ☐ ☐ ☐ Other factors (e.g., dam failure)? _____

STANDARD CODE REQUIREMENTS

☒ Building Ordinance No. 2225 C Section 308A ☒ Ordinance No. 12,114 (Floodways)
☒ Approval of Drainage Concept by DPW

☐ **MITIGATION MEASURES /** ☐ **OTHER CONSIDERATIONS**

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☐ Lot Size ☐ Project Design

The potential for impacts related to hydrological and flood hazards in the area subject to the proposed ordinance was evaluated with regard to the applicable County of Los Angeles General Plan, State of California Regional Water Quality Control Board Basin Plan for the Los Angeles Regional Water Quality Control Board Los Angeles Basin Plan, National Flood Insurance Program Flood Insurance Rate Maps for the County of Los Angeles, and the U.S. Geological Survey (USGS) topographic quadrangle maps.

The analysis concludes that the proposed ordinance will not result in significant impacts to hydrology that would create hazards from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death due to flooding. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).
>
> *The ordinance has limited applicability*. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.
>
> *There are existing measures in place that limit any potential impacts.* All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health). Some projects will require approval of a drainage concept from the Department of Public Works. Furthermore, future requests for *reasonable accommodation* will be required to comply with County Code requirements for setbacks or other measures to avoid flood hazard impacts, as well as General Plan policies that discourage development in flood prone areas (per Los Angeles County General Plan Conservation and Open Space Element Policy 22).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

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CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be impacted by **flood (hydrological)** factors?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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HAZARDS - 3. Fire

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Is the project site located in a Very High Fire Hazard Severity Zone (Fire Zone 4)? The proposed ordinance would not be expected to allow for new development to locate in a Very High Fire Hazard Severity Zone (Fire Zone 4). While there are some unincorporated areas of Los Angeles County that are located in Very High Fire Hazard Severity Zones (Fire Zone 4, per Los Angeles County General Plan Safety Element Plate 7), the project is a discretionary procedure that will not likely result in such impacts. Future requests for *reasonable accommodation* are subject to the County's Fire Code and require the appropriate approvals, including clearance prior to occupancy, from the Los Angeles County Fire Department, as applicable. Requests for *reasonable accommodation* that are located in Very High Fire Hazard Severity Zones may require additional review by the Fire Department (Source: Los Angeles County Fire Department). In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. Furthermore, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages residential uses in fire hazard areas, a reasonable accommodation is not likely to locate a project within a Very High Fire Hazard Severity Zone (Fire Zone 4), or create significant impacts.
b.	☐	☐	☒	Is the project site in a high fire hazard area and served by inadequate access due to lengths, widths, surface materials, turnarounds or grade? The proposed ordinance would not be expected to allow for development in a high fire hazard area that is served by inadequate access due to lengths, widths, surface materials, turnarounds or grades. There are some unincorporated areas of Los Angeles County that are located in Very High Fire Hazard Severity Zones (Fire Zone 4, per Los Angeles County General Plan Safety Element Plate 7). Access issues identified in association with future requests for *reasonable accommodation* will be addressed during the Department of Public Works and the Fire Department's review and permit approval process. In addition, Fire Department clearance may be required prior to occupancy (Source: Los Angeles County Fire Department). In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages fire hazards, such as inadequate access, a reasonable accommodation is not likely to locate a project in such an area or create significant impacts.
c.	☐	☐	☒	Does the project site have more than 75 dwelling units on a single access in a high fire hazard area? The proposed ordinance would not be expected to result in more than 75 dwelling units on a single access in a high fire hazard area. The project is a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Because a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages residential developments in fire hazard areas and inadequate access, a reasonable accommodation is not

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likely to locate a project in such an area or create significant impacts.

d. ☐ ☐ ☒ Is the project site located in an area having inadequate water and pressure to meet fire flow standards?
Although there are unincorporated areas with inadequate water and pressure to meet fire hazard conditions, the proposed ordinance would not be expected to result in such development. Future requests for *reasonable accommodation* are subject to the County's Fire Code and may require the appropriate approvals from the Los Angeles County Fire Department. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* is located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages projects that would place people and property at risk of fire hazards, the granting of a reasonable accommodation is not likely to facilitate a project with inadequate water and pressure to meet fire flow standards.

e. ☐ ☐ ☒ Is the project site located in close proximity to potential dangerous fire hazard conditions/uses (such as refineries, flammables, explosives manufacturing)?
Although there are unincorporated areas in close proximity to potential dangerous fire hazard conditions, the proposed ordinance would not be expected to result in such development. Future requests for *reasonable accommodation* are subject to the County's Fire Code and may require the appropriate approvals from the Los Angeles County Fire Department. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* is located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. Furthermore, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with locating a project in close proximity to potentially dangerous fire hazard conditions, the granting of a reasonable accommodation is not likely to locate a project in such areas or create significant impacts.

f. ☐ ☒ ☐ Does the proposed use constitute a potentially dangerous fire hazard?
Because a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages potentially dangerous fire hazard conditions, the granting of a reasonable accommodation is not likely to locate a project in such areas or create significant impacts. Therefore, a reasonable accommodation would not constitute a fire hazard.

g. ☐ ☐ ☐ Other factors?_____

STANDARD CODE REQUIREMENTS
☒ Water Ordinance No. 7834 ☒ Fire Ordinance No. 2947 ☒ Fire Regulation No. 8
☒ Fuel Modification/Landscape Plan

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**
☐ Project Design ☐ Compatible Use

The above analysis is undertaken to determine if the proposed ordinance to establish a reasonable accommodation

procedure may have a significant impact related to fire hazards, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. Fires are natural and man-made threats that can pose a substantial or potential hazard to human health or the environment when improperly managed. Fires may be caused by reactive or ignitable hazardous wastes that appear on special Environmental Protection Agency (EPA) lists. The potential for the impacts related to fire hazards in the area subject to the proposed ordinance was evaluated based on expert opinion supported by facts, review of environmental databases, and the County of Los Angeles General Plan.

The analysis concludes that the proposed ordinance will not result in significant impacts to the environment that would create hazards from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death due to fires. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).
>
> *The ordinance has limited applicability*. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.
>
> *There are existing measures in place that limit any potential impacts.* All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be impacted by **fire hazard** factors?

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☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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HAZARDS - 4. Noise

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Is the project site located near a high noise source (airports, railroads, freeways, industry)?

While it is possible that projects could be located near excessive noise levels if they are located near existing noise sources, such as freeways, railroads, raceways, airports, or industrial operations, the proposed ordinance would not be expected to locate development near a high noise source. The project is an ordinance to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Future requests for *reasonable accommodation* are subject to the County's building code and noise ordinance and may require approvals from the Los Angeles County Department of Public Works and Department of Public Health (Environmental Health), as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if a CEQA review indicates that a particular *reasonable accommodation* would be located in such an area, the project-level CEQA review would address the impacts, and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects sensitive uses from high noise sources, a reasonable accommodation is not likely to locate a residential project near a high noise source, or create significant impacts.

b.	☐	☐	☒	Is the proposed use considered sensitive (school, hospital, senior citizen facility) or are there other sensitive uses in close proximity?

Reasonable accommodations are associated with residential uses and can be located in proximity to sensitive uses. Future requests for *reasonable accommodation* are subject to the County's building code and noise ordinance and may require the appropriate approvals from the Los Angeles County Department of Public Works, and Department of Public Health (Environmental Health), as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan and County Code regulate noise impacts on sensitive uses, a reasonable accommodation is not likely to create significant impacts to sensitive uses.

c.	☐	☐	☒	Could the project substantially increase ambient noise levels including those associated with special equipment (such as amplified sound systems) or parking areas associated with the project?

Future requests for *reasonable accommodation* are expected to generate noise levels that are consistent with residential uses. Future requests for *reasonable accommodation* are subject to the County's building code and noise ordinance and may require the appropriate approvals from the Los Angeles County Department of Public Works, and Department of Public Health (Environmental Health), as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects sensitive uses against noise impacts, a reasonable

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accommodation is not likely to substantially increase ambient noise levels including those associated with special equipment such as amplified sounds systems, or parking areas associated with the project.

d. ☐ ☐ ☒ Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels without the project?
Although it is possible that construction noise would be generated during the construction of development associated with a *reasonable accommodation*, the proposed ordinance would not likely spur such development noise. Future requests for *reasonable accommodation* are subject to the County's building code and noise ordinance and may require approvals from the Los Angeles County Department of Public Works, and Department of Public Health (Environmental Health), as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects against noise impacts, a reasonable accommodation is not likely to result in a project that has a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels without the project.

e. ☐ ☐ ☐ Other factors? _____

STANDARD CODE REQUIREMENTS
☒ Noise Ordinance No. 11,778 ☒ Building Ordinance No. 2225--Chapter 35

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**
☐ Lot Size ☐ Project Design ☐ Compatible Use

The above analysis is undertaken to determine if the proposed ordinance to establish a reasonable accommodation procedure may have a significant impact related to noise, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to noise in the area subject to the proposed ordinance was evaluated with regard to the County of Los Angeles General Plan and the County Noise Control Ordinance (Ordinances 11778 and 11773).

The analysis concludes that the proposed ordinance will not result in significant impacts to the environment that would create hazards from exposing people or structures to potential increased noise levels and/or vibration. This is due to the following:

The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are

exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health). In addition, future requests for *reasonable accommodations* will be required to meet current noise standards and comply with the County Noise Ordinance. Developments associated with requests for *reasonable accommodation* that are subject to project-level environmental review and located near uses that produce 45 decibels or greater could incorporate sound attenuation measures, such as the installation of sound walls, to protect occupants from these noise impacts.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be adversely impacted by **noise**?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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RESOURCES - 1. Water Quality

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Is the project site located in an area having known water quality problems and proposing the use of individual water wells?

There are unincorporated areas that are known to have water quality problems. Future requests for *reasonable accommodation* may be located in areas that require the use of individual water wells. The project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Projects facilitated by the ordinance are subject to County health and plumbing provisions, and require the appropriate permits and approvals issued by the County Department of Public Health (Environmental Health), Regional Planning and Public Works, as applicable. In addition, all future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with locating projects in areas with known water quality problems and the use of individual water wells, a reasonable accommodation is not likely to locate a project in such areas, or create significant impacts.

b.	☐		☒	Will the proposed project require the use of a private sewage disposal system?

There are unincorporated areas that are known to require private sewage systems. Requests for *reasonable accommodation* may be located in areas served by private onsite sewage disposal systems. Future requests for *reasonable accommodation* are subject to County health and plumbing provisions, and require the appropriate permits and approvals issued by the County Department of Public Health (Environmental Health) and Public Works, as applicable. In addition, all future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan, a reasonable accommodation is not likely to facilitate the impacts associated the use of a private sewage disposal system.

	☐	☐	☒	If the answer is yes, is the project site located in an area having known septic tank limitations due to high groundwater or other geotechnical limitations *or* is the project proposing on-site systems located in close proximity to a drainage course?

There are unincorporated areas that are known to have septic tank limitations. Requests for *reasonable accommodation* may be located in or in proximity to these areas. Future requests for *reasonable accommodation* are be subject to County health and plumbing provisions, and require the appropriate permits and approvals issued by the County Department of Public Health (Environmental Health) and Public Works, as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed a through a project level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with private sewage systems in limited areas, a reasonable accommodation is not likely to locate a project in such an area, propose on-site systems located in close proximity to a drainage course, or create significant impacts.

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c. ☐ ☐ ☒ Could the project's associated construction activities significantly impact the quality of groundwater and/or storm water runoff to the storm water conveyance system and/or receiving water bodies? Future requests for *reasonable accommodation* are subject to County National Pollutant Discharge Elimination System (NPDES) requirements, and may require the appropriate permits and approvals issued by the County Department of Public Health (Environmental Health) and Public Works, as well as the California Regional Water Quality Control Board (RWQCB), as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages impacts to quality of groundwater and/or storm water runoff to the storm water conveyance system and/or receiving water bodies, the granting of a reasonable accommodation is not likely to facilitate construction activities that create such impacts.

d. ☐ ☐ ☒ Could the project's post-development activities potentially degrade the quality of storm water runoff and/or could post-development non-storm water discharges contribute potential pollutants to the storm water conveyance system and/or receiving bodies?
Future requests for *reasonable accommodation* are subject to County NPDES requirements, and require the appropriate permits and approvals issued by the County Department of Public Health (Environmental Health) and Public Works, as well as the RWQCB, as applicable. In addition, all future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages impacts that degrade the quality of stormwater runoff and/or pollute stormwater conveyance systems and receiving water bodies, a reasonable accommodation is not likely to facilitate activities to create such impacts.

e. ☐ ☐ ☐ Other factors? _____

STANDARD CODE REQUIREMENTS
☐ Industrial Waste Permit ☒ Health Code Ordinance No. 7583, Chapter 5
☒ Plumbing Code Ordinance No. 2269 ☒ NPDES Permit Compliance (DPW)

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**
☐ Lot Size ☐ Project Design

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact related to water quality, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to water quality in the area subject to the proposed ordinance was evaluated with regard to the applicable County of Los Angeles General Plan, State of California Regional Water Quality Control Board Basin Plan for the Los Angeles Regional Water Quality Control Board Los Angeles Basin Plan.

The analysis concludes that the proposed ordinance will not result in significant impacts to the environment that would create hazards from exposing people or structures to potential degraded water quality. This is due to the following:

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The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be impacted by, **water quality** problems?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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RESOURCES - 2. Air Quality

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☒	☐	Will the proposed project exceed the State's criteria for regional significance (generally (a) 500 dwelling units for residential uses or (b) 40 gross acres, 650,000 square feet of floor area or 1,000 employees for nonresidential uses)? The project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Given its limited scope, the ordinance is not likely to result in reasonable accommodation to facilitate projects that exceed the State's criteria for regional significance.
b.	☐	☐	☒	Is the proposal considered a sensitive use (schools, hospitals, parks) and located near a freeway or heavy industrial use? Reasonable accommodation is associated with residential uses and can be located in proximity to sensitive uses. Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with locating sensitive uses near freeways and heavy industrial uses, a reasonable accommodation is not likely to locate a project near a freeway or heavy industrial use, or create significant impacts.
c.	☐	☐	☒	Will the project increase local emissions to a significant extent due to increased traffic congestion or use of a parking structure, or exceed AQMD thresholds of potential significance? Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with significantly increasing local emissions or exceeding AQMD thresholds, a reasonable accommodation is not likely to create such impacts.
d.	☐	☐	☒	Will the project generate or is the site in close proximity to sources which create obnoxious odors, dust, and/or hazardous emissions? Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with generating or locating in close proximity to air pollution sources, a reasonable accommodation is not likely to create such impacts.
e.	☐	☐	☒	Would the project conflict with or obstruct implementation of the applicable air quality plan? Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan is consistent with the goals of the South Coast Air Quality Management Plan, a reasonable accommodation is not likely to conflict with or obstruct the implementation of the South Coast Air Quality Management Plan.

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f. ☐ ☐ ☒ Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with violating air quality standards or contributing significantly to existing/project air quality violations, a reasonable accommodation is not likely to violate any air quality standard or contribute substantially to an existing or projected air quality violation.

g. ☐ ☐ ☒ Would the project result in 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)?
Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with increasing air pollutants, a reasonable accommodation is not likely to result in a cumulatively considerable net increase of any criteria pollutant.

h. ☐ ☐ ☐ Other factors: _____

STANDARD CODE REQUIREMENTS
☒ Health and Safety Code Section 40506

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**
☐ Project Design ☐ Air Quality Report

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact related to air quality, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to air quality in the area subject to the proposed ordinance was evaluated with regard to the County of Los Angeles (County) General Plan, the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), and the Clean Air Act (CAA). Data on existing air quality in the South Coast Air Basin, in which the area affected by the proposed ordinance is located, is monitored by a network of air monitoring stations operated by the California Environmental Protection Agency (CalEPA), Air Resources Board (CARB) and the South Coast Air Quality Management District.

The analysis concludes that the proposed ordinance will not result in significant impacts to the environment that would create hazards from exposing people or structures to potential degraded air quality. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the

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construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on, or be impacted by, **air quality**?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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RESOURCES - 3. Biota

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Is the project site located within a Significant Ecological Area (SEA), SEA Buffer, or coastal Sensitive Environmental Resource (ESHA, etc.), or is the site relatively undisturbed and natural?

Although there are many areas within unincorporated Los Angeles County are relatively natural and undisturbed (Source: Los Angeles County SEA and ESHA maps), the proposed ordinance would not be expected to allow development in such areas. The project is a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Future requests for *reasonable accommodation* are be subject to the County environmental policies and require the appropriate permits and approvals issued by the County Department of Regional Planning, such as Oak Tree Permits, and SEATAC and ERB reviews, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA and other reviews, and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan prohibits, discourages and regulates environmentally sensitive areas, a reasonable accommodation is not likely to locate a project within a Significant Ecological Area (SEA), SEA Buffer or coastal Sensitive Environmental Resource Area (ESHA, etc.), nor is it likely to be located in a relatively undisturbed or natural area. (Source: Los Angeles County General Plan Land Use Element Policy 13 and Conservation and Open Space Element Policy 7). Furthermore, a reasonable accommodation is unlikely to create significant impacts.

b.	☐	☐	☒	Will grading, fire clearance, or flood related improvements remove substantial natural habitat areas?

Future requests for *reasonable accommodation* will require the appropriate permits and approvals from the Department of Fire, Public Works, and Public Health (Environmental Health), as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourage impacts to natural habitat areas, a reasonable accommodation is not likely to result in grading, fire clearance or flood related improvements that will substantially remove these areas, or create significant impacts. (Source: Los Angeles County General Plan Conservation and Open Space Element Policy 12).

c.	☐	☐	☒	Is a major drainage course located on the project site that is depicted on USGS quad sheets by a blue dashed line or that may contain a bed, channel, or bank of any perennial, intermittent or ephemeral river, stream or lake?

Although unincorporated Los Angeles County contains many areas with major drainage courses, the proposed ordinance would not likely locate development in such areas. (Source: USGS Quad Sheets). Future requests for *reasonable accommodation* are subject to the County environmental policies and may require the appropriate permits and

approvals issued by the County Department of Regional Planning, such as Oak Tree Permits, and SEATAC and ERB reviews, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages impacts such as projects that include a major drainage course or may contain a bed, channel, or bank of any perennial, intermittent or ephemeral river, stream or lake, a reasonable accommodation is not likely to locate a project on or near such areas, or create significant impacts. (Source: Los Angeles County General Plan Land Use Element Policy 13 and Conservation and Open Space Element Policy 7).

d. ☐ ☐ ☒ Does the project site contain a major riparian or other sensitive habitat (e.g., coastal sage scrub, oak woodland, sycamore riparian woodland, wetland, etc.)?

Unincorporated Los Angeles County contains many areas with major riparian and other sensitive habitats. Future requests for *reasonable accommodation* are subject to the County environmental policies and may require the appropriate permits and approvals issued by the County Department of Regional Planning, such as Oak Tree Permits, and SEATAC and ERB reviews, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and other reviews, and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects watersheds, streams, and riparian vegetation, a reasonable accommodation is not likely to locate a project in a major riparian or other sensitive habitat (e.g. coastal sage scrub, oak woodlands, sycamore riparian woodland, wetland, etc.), or create significant impacts. (Source: Los Angeles County General Plan Conservation and Open Space Element policy 12).

e. ☐ ☐ ☒ Does the project site contain oak or other unique native trees (specify kinds of trees)?

There are oaks and other unique native trees within the unincorporated areas of Los Angeles County. Future requests for *reasonable accommodation* are subject to the County environmental policies and may require the appropriate permits and approvals issued by the County Department of Regional Planning, such as Oak Tree Permits, and SEATAC and ERB reviews, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and other reviews, and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects oaks and native trees, a reasonable accommodation is not likely to create impacts to contain oak or other unique native trees.

f. ☐ ☐ ☒ Is the project site habitat for any known sensitive species (federal or state listed endangered, etc.)?

There are some unincorporated areas that contain sensitive species. Future requests for *reasonable accommodation* are subject to County environmental policies and require the appropriate permits and approvals issued by the County Department of Regional

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Planning. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects natural habitats with sensitive species, a reasonable accommodation is not likely to locate a project in a habitat for any known sensitive species listed by the federal or state government, or create significant impacts.

g. ☐ ☐ ☐ Other factors (e.g., wildlife corridor, adjacent open space linkage)? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**
☐ Lot Size ☐ Project Design ☒ Oak Tree Permit ☒ ERB/SEATAC Review

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact related to biological resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to biological resources in the area subject to the proposed ordinance was evaluated with regard to the County of Los Angeles (County) General Plan; in coordination with resource agencies (U.S. Fish and Wildlife Service and California Department of Fish and Game); a query of the California Natural Diversity Database (CNDDB); and a review of published and unpublished literature germane to the proposed ordinance.

The analysis concludes that the proposed ordinance will not result in significant impacts to biological resources. This is due to the following:

The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future

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requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on **biotic resources**?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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RESOURCES - 4. Archaeological / Historical / Paleontological

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Is the project site in or near an area containing known archaeological resources or containing features (drainage course, spring, knoll, rock outcroppings, or oak trees) which indicate potential archaeological sensitivity?

There are areas that contain known archeological resources or that contain features (drainage course, spring, knoll, rock outcroppings, or oak trees), which indicate potential archeological sensitivity within the unincorporated areas of Los Angeles County. The project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects areas of known archeological resources or areas that indicate potential archaeological sensitivity, a reasonable accommodation is not likely to locate a project in or near such an area, or create significant impacts.

b.	☐	☐	☒	Does the project site contain rock formations indicating potential paleontological resources?

There are areas that contain rock formations indicating potential paleontological resources. Vasquez Rocks, which contains unique geological rock formations and is considered a cultural resource, is located in unincorporated Santa Clarita Valley and within a Very High Fire Hazard Severity Zone (Source: Preliminary Draft Santa Clarita Valley Area Plan, 2008). Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects areas with potential paleontological resources, a reasonable accommodation is not likely to locate a project in such an area, or create significant impacts.

c.	☐	☐	☒	Does the project site contain known historic structures or sites?

There is an estimated 17 historical or cultural resource sites in unincorporated Los Angeles County (Source: LA County Draft General Plan). Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan, a reasonable accommodation is not likely to facilitate a project that contains known historic structures or sites, or create significant impacts.

d.	☐	☐	☒	Would the project cause a substantial adverse change in the significance of a historical or archaeological resource as defined in 15064.5?

Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of

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the land use and zoning program and as the General Plan protects historical and archaeological resources, a reasonable accommodation is not likely to cause a substantial adverse change in the significance of a historical or archeological resource as defined in 15064.5.

e. ☐ ☐ ☒ Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects paleontological, geologic and other resources, a reasonable accommodation is not likely to directly or indirectly destroy a unique paleontological resource or site of unique geologic feature.

f. ☐ ☐ ☐ Other factors? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**

☐ Lot Size ☐ Project Design ☐ Phase I Archaeology Report

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact related to cultural resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to cultural resources in the area subject to the proposed ordinance was evaluated with regard to the County of Los Angeles County General Plan, a review of the Directory of Historic Properties for Los Angeles County compiled by the Office of Historic Preservation, and a review of published literature germane to the proposed ordinance.

The analysis concludes that the proposed ordinance will not result in significant impacts to archaeological, historical or paleontological resources. This is due to the following:

The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a

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reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **archaeological, historical**, or **paleontological** resources?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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RESOURCES - 5.Mineral Resources

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The proposed ordinance would not likely result in the loss of availability of a known mineral resource that would be of value to the region and state. The project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Department of Regional Planning, and subject to the CA Surface Mining and Reclamation Act. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects mineral resources, the a reasonable accommodation is not likely to result in the loss of availability of a known mineral resources.

b.	☐	☐	☒	Would the project result in the loss of availability of a locally important mineral resource discovery site delineated on a local general plan, specific plan or other land use plan?

The proposed ordinance would not likely result in the loss of availability of locally important mineral resource discovery site delineated on a local general plan, specific plan or other land use plan. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Department of Regional Planning, and subject to the CA Surface Mining and Reclamation Act. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects mineral resources, a reasonable accommodation is not likely to result in the loss of availability of a locally important mineral resource discovery site.

c.	☐	☐	☐	Other factors? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**

☐ Lot Size ☐ Project Design

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact related to cultural resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to mineral resources in the area subject to the proposed ordinance was evaluated with regard to California Geological Survey publications and the County of Los Angeles General Plan.

The analysis concludes that the proposed ordinance will not result in significant impacts to mineral resources. This is

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due to the following:

The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health), as well as General Plan policies that protect known mineral resources reserves from encroachment of incompatible land uses (Source: Los Angeles County General Plan Land Use Element Policy 26).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **mineral** resources?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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RESOURCES - 6. Agriculture Resources

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Would the project convert 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? Although there are known unincorporated areas that include areas identified by the Farmland Mapping and Monitoring Program of the California Resources Agency, the proposed ordinance would not likely result in development in such areas. The project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Department of Regional Planning, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects farmland from conversion to non-agricultural uses, a reasonable accommodation is not likely to convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to a non-agricultural use, or create significant impacts.
b.	☐	☐	☒	Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Department of Regional Planning, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, a reasonable accommodation is not likely to conflict with the existing zoning. Furthermore, Los Angeles County does not participate in agricultural Williamson Act contracts (Source: California State Department of Conservation).
c.	☐	☐	☒	Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Department of Regional Planning, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects farmland from conversion to non-agricultural uses, the granting a reasonable accommodation is not likely to involve other changes in the existing environment which, due to their location and nature, could result in conversion of Farmland to non-agricultural use, or create significant impacts.

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d. ☐ ☐ ☐ Other factors? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**
☐ Lot Size ☐ Project Design

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact related to cultural resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to agricultural resources in the area subject to the proposed ordinance was evaluated with regard to the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) and the County of Los Angeles (County) General Plan.

The analysis concludes that the proposed ordinance will not result in significant impacts to agricultural resources. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).
>
> *The ordinance has limited applicability*. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.
>
> *There are existing measures in place that limit any potential impacts.* All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health), as well as General Plan policies that protect agricultural resources from encroachment of incompatible land uses (Source: Los Angeles County General Plan Land Use Element Policies 21, 22, 23).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless,

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the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project leave a significant impact (individually or cumulatively) on **agriculture** resources?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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RESOURCES - 7. Visual Qualities

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐		☒	Is the project site substantially visible from or will it obstruct views along a scenic highway (as shown on the Scenic Highway Element), or is it located within a scenic corridor or will it otherwise impact the viewshed?

The proposed ordinance would not be expected to result in impacts to scenic vistas, including views along a scenic highway or scenic corridor. A scenic vista is typically defined as a public view of highly valued visual and scenic resources such as urban skylines and distant mountain ranges, particularly from public vantage points. The diverse landscape of unincorporated Los Angeles County contains many scenic vistas, and including portions of Mulholland Highway, Las Virgenes Road, Malibu Canyon Road, and Angeles Crest Highway that are adopted Scenic Highways. However, the project is a discretionary procedure that is not likely to result in development that would impact these resources. The project is a proposed amendment to the zoning code to provide a discretionary procedure for requesting *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects visual resources, a reasonable accommodation is not likely to locate a project in an area that is substantially visible from, nor will it obstruct views along, a scenic highway, as shown in the Scenic Highway Element; nor is it likely to be located within a scenic corridor; nor will it likely otherwise impact the viewshed. In addition, a reasonable accommodation is not likely to create significant impacts.

b.	☐		☒	Is the project substantially visible from or will it obstruct views from a regional riding or hiking trail?

The proposed ordinance would not be expected to result in impacts from developments that are substantially visible from or that will obstruct views from a regional riding or hiking trail. Trails are scenic and recreational resources that exist within the unincorporated areas of Los Angeles County. However, the proposed project is a discretionary procedure and is not likely to create impacts to these resources. Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, and as the General Plan protects viewsheds and visual resources, a reasonable accommodation is not likely to be located in an area that is substantially visible from, nor will it obstruct views from, a regional riding or hiking trail. In addition, a reasonable accommodation is not likely to create significant impacts.

c.	☐		☒	Is the project site located in an undeveloped or undisturbed area, which contains unique aesthetic features?

The proposed ordinance would not be expected to result in impacts from development in undeveloped or undisturbed areas which contain unique aesthetic features. Although there are undeveloped or undisturbed areas throughout the unincorporated areas of Los Angeles County, the proposed project creates a discretionary procedure that would not likely result in

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such development. Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan, a reasonable accommodation is not likely to locate a project in an undeveloped or undisturbed area that contains unique aesthetic features, or create significant impacts.

d. ☐ ☐ ☒ Is the proposed use out-of-character in comparison to adjacent uses because of height, bulk, or other features?

The proposed ordinance would not be expected to result in impacts from development that is out of character in comparison to adjacent uses because of height, bulk or other features. The proposed project creates a discretionary procedure that would not likely result in such development because future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, the granting of a reasonable accommodation is not likely to be out of character in comparison to adjacent uses, because of height, bulk or other features, or create significant impacts.

e. ☐ ☐ ☒ Is the project likely to create substantial sun shadow, light or glare problems?

The proposed ordinance would not be expected to create impacts from substantial sun shadow, light or glare problems. The proposed project creates a discretionary procedure for persons with disabilities to request waivers or exceptions to rules when necessary and reasonable, to ensure fair housing access. Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, the granting of a reasonable accommodation is not likely to create substantial sun shadow, light or glare problems, or create significant impacts.

f. ☐ ☐ ☐ Other factors (e.g., grading or land form alteration): _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**

☐ Lot Size ☐ Project Design ☐ Visual Report ☐ Compatible Use

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact related to aesthetics or visual resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to visual resources and aesthetics in the area subject to the proposed ordinance was evaluated with regard to the County of Los Angeles General Plan and expert knowledge regarding the visual character of the area affected by the proposed ordinance.

The analysis concludes that the proposed ordinance will not result in significant impacts to aesthetics and visual resources. This is due to the following:

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The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health). Future requests for *reasonable accommodation* must be consistent with General Plan policies that provide protection to lands of major scenic value and ensure compatibility of development (Source: Los Angeles County General Plan)

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on **scenic** qualities?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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SERVICES - 1. Traffic/Access

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Does the project contain 25 dwelling units, or more and is it located in an area with known congestion problems (roadway or intersections)? The proposed ordinance would not be expected to create traffic impacts from the development of 25 dwelling units or more. While there are known congestion problems in the unincorporated areas, the project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Departments of Regional Planning and Public Works, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages a low level of service for circulation, a reasonable accommodation is not likely to result in an increase in congestion problems, or create significant impacts.
b.	☐	☐	☒	Will the project result in any hazardous traffic conditions? The proposed ordinance would not be expected to result in any hazardous traffic conditions. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Departments of Regional Planning and Public Works, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages poor circulation and safety hazards, a reasonable accommodation is not likely to result in any hazardous traffic conditions, or create significant impacts.
c.	☐	☐	☒	Will the project result in parking problems with a subsequent impact on traffic conditions? The proposed ordinance would not be expected to result in any parking problems with a subsequent impact on traffic conditions. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Departments of Regional Planning and Public Works, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan, the granting of a reasonable accommodation is not likely to result in parking problems with a subsequent impact on traffic conditions.
d.	☐	☐	☒	Will inadequate access during an emergency (other than fire hazards) result in problems for emergency vehicles or residents/employees in the area? The proposed ordinance would not be expected to result in or be located in areas that have inadequate access during an emergency that would result in problems for emergency vehicles. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Departments of Regional Planning, Fire Department, and Public Works,

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as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages inadequate emergency access, a reasonable accommodation is not likely to result in inadequate access during an emergency for emergency vehicles or residents/employees in the area, or create significant impacts.

e. ☐ ☐ ☒ Will the congestion management program (CMP) Transportation Impact Analysis thresholds of 50 peak hour vehicles added by project traffic to a CMP highway system intersection or 150 peak hour trips added by project traffic to a mainline freeway link be exceeded?

The proposed ordinance would not be expected to generate a significant number of increased trips. The proposed ordinance creates a discretionary procedure, and would not likely result in increased trip generation. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Departments of Regional Planning and Public Works, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages poor circulation, a reasonable accommodation is not likely to exceed thresholds outlined in the congestion management program (CMP), or create significant impacts.

f. ☐ ☐ ☒ Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The proposed ordinance would not be expected to conflict with adopted policies, plans or programs supporting alternative transportation. The proposed ordinance establishes a discretionary procedure through which any impacts could be evaluated. Future requests for *reasonable accommodation* are subject to County environmental and land use provisions and require the appropriate permits and approvals issued by the County Departments of Regional Planning and Public Works, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, a reasonable accommodation is not likely to conflict with adopted policies, plans or programs supporting alternative transportation.

g. ☐ ☐ ☐ Other factors? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**

☐ Project Design ☒ Traffic Report ☒ Consultation with Traffic & Lighting Division

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact related to traffic and access, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to transportation and traffic in the area subject to the proposed ordinance was evaluated with regard to the County of Los Angeles (County) General Plan and the adopted Congestion Management Program (CMP).

The analysis concludes that the proposed ordinance will not result in significant impacts to transportation an traffic.

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This is due to the following:

The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health), as well as General Plan policies that encourage efficient and adequate transportation and access.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **traffic/access** factors?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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SERVICES - 2. Sewage Disposal

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	If served by a community sewage system, could the project create capacity problems at the treatment plant?

The proposed ordinance would not likely create capacity problems at a sewage treatment plant. The project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Future requests for *reasonable accommodation* will require the appropriate permits and approvals from the County Departments of Health and Public Works, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages such impacts, a reasonable accommodation is not likely to create capacity problems at a community treatment plant.

b.	☐	☐	☒	Could the project create capacity problems in the sewer lines serving the project site?

The proposed ordinance would not likely result in capacity problems in sewer lines. Future requests for *reasonable accommodation* will require the appropriate permits and approvals from the County Departments of Health and Public Works, as applicable. In addition, future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan encourages adequate infrastructure, a reasonable accommodation is not likely to create capacity problems in the sewer lines serving a potential project site, or create significant impacts.

c.	☐	☐	☐	Other factors? _____

STANDARD CODE REQUIREMENTS

☒ Sanitary Sewers and Industrial Waste Ordinance No. 6130

☐ Plumbing Code Ordinance No. 2269

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact on sewage disposal facilities, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to sewage disposal facilities in the area subject to the proposed ordinance was evaluated with regard to the California Integrated Waste Management Board Web site, the County of Los Angeles Draft Public Services and Facilities Element and the adopted County of Los Angeles (County) General Plan Safety Element.

The analysis concludes that the proposed ordinance will not result in significant impacts to sewage disposal

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facilities. This is due to the following:

The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health). Future requests for *reasonable accommodation* will be subject to all applicable County codes and policies, in addition to regulations per Title 25 CCR §784, 786, and 788, regarding sewage disposal, underground sewage tanks, and maintenance.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **sewage disposal** facilities?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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SERVICES - 3. Education

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Could the project create capacity problems at the district level? The proposed ordinance would not be expected to create capacity problems at the district level. There are known capacity problems within some school districts in the unincorporated area. The project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan encourages adequate public facilities, a reasonable accommodation is not likely to create capacity problems at the district level.
b.	☐	☐	☒	Could the project create capacity problems at individual schools which will serve the project site? The proposed ordinance would not be expected to result in any capacity problems at individual schools. The proposed ordinance establishes a discretionary procedure, and future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan encourages adequate public facilities, a reasonable accommodation is not likely to create capacity problems at individual schools.
c.	☐	☐	☒	Could the project create student transportation problems? The proposed ordinance would not be expected to result in any student transportation problems. The proposed ordinance creates a discretionary procedure, and future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan encourages adequate public facilities and discourages poor circulation, a reasonable accommodation is not likely to create student transportation problems.
d.	☐	☐	☒	Could the project create substantial library impacts due to increased population and demand? The proposed ordinance would not be expected to result in any substantial library impacts due to increased population and demand. The proposed ordinance creates a discretionary procedure, and future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan encourages adequate facilities, a reasonable accommodation is not likely to create substantial library impacts. In addition, due the scope of the ordinance, it is unlikely that a reasonable accommodation will result in a significant increase in population

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and demand for library facilities.

e. ☐ ☐ ☐ Other factors? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**
☐ Site Dedication ☐ Government Code Section 65995 ☐ Library Facilities Mitigation Fee

The above analysis is undertaken to determine if the proposed ordinance to establish a discretionary procedure to grant reasonable accommodations may have a significant impact on educational facilities, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to education in the area subject to the proposed ordinance was evaluated based on review of the County of Los Angeles (County) General Plan and the County of Los Angeles web site.

The analysis concludes that the proposed ordinance will not result in significant impacts to educational facilities. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).
>
> *The ordinance has limited applicability*. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.
>
> *There are existing measures in place that limit any potential impacts.* All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health). Future requests for *reasonable accommodation* will be subject to all applicable County codes and policies, in addition to regulations per Title 25 CCR §784, 786, and 788, regarding sewage disposal, underground sewage tanks, and maintenance.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable

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accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **educational** facilities/services?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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SERVICES - 4. Fire/Sheriff Services

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Could the project create staffing or response time problems at the fire station or sheriff's substation serving the project site? The proposed ordinance would not be expected to create staffing or response time problems. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, and as the General Plan encourages adequate facilities and emergency response, a reasonable accommodation is not likely to create staffing or response time problems at the fire station or sheriff's substation serving a potential project site.
b.	☐		☒	Are there any special fire or law enforcement problems associated with the project or the general area? The proposed ordinance establishes a discretionary procedure for persons with disabilities to obtain equal access to residential uses. Although there are a variety of special fire and law enforcement problems throughout the unincorporated area, the project is not likely to worsen these problems. Future requests for reasonable accommodation are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, a reasonable accommodation is not likely to be associated with, or located in, an area with special fire or law enforcements problems.
c.	☐	☐	☐	Other factors? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**

☐ Fire Mitigation Fees

The above analysis is undertaken to determine if the proposed ordinance may have a significant impact to fire and sheriff services, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to public services in the area subject to the proposed ordinance was evaluated based on review of the County of Los Angeles (County) General Plan, the County of Los Angeles web site and expert interviews.

The analysis concludes that the proposed ordinance will not result in significant impacts on fire and sheriffs services that would create hazards from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc.

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Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health).

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **fire/sheriff** services?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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SERVICES - 5. Utilities/Other Services

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Is the project site in an area known to have an inadequate public water supply to meet domestic needs or to have an inadequate ground water supply and proposes water wells? The proposed ordinance would not be expected to result in development in areas known t have an inadequate public water supply to meet domestic needs or to have an inadequate ground water supply nor propose water wells. While there are unincorporated areas of Los Angeles County known to have an inadequate public water supply to meet domestic needs or that have inadequate groundwater supply, future requests for *reasonable accommodation* are subject to the County's water and plumbing provisions and require the appropriate permit and approvals from the County Departments of Public Health, Regional Planning, Fire and Public Works, as applicable. Furthermore, all future requests for reasonable accommodations are subject to project-level CEQA, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages the impacts associated with an inadequate supply of water, a reasonable accommodation is not likely to create such impacts.
b.	☐	☐	☒	Is the project site in an area known to have an inadequate water supply and/or pressure to meet fire-fighting needs? The proposed ordinance would not be expected to result in development in areas known to have an inadequate water supply and/or pressures to meet fire-fighting needs. There are areas in the unincorporated County that are known to have an inadequate water supply and/or pressure to meet fire-fighting needs. Future requests for *reasonable accommodation* are subject to the County's water and plumbing provisions and require the appropriate permit and approvals from the County Departments of Public Health, Regional Planning, Fire and Public Works, as applicable. In addition, future requests for reasonable accommodations are subject to project-level CEQA, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. Furthermore, as a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan discourages projects with an inadequate water supply for fire fighting and other needs, a reasonable accommodation is not likely to locate projects in such areas or create significant impacts.
c.	☐	☐	☒	Could the project create problems with providing utility services, such as electricity, gas, or propane? The proposed ordinance would not be expected to create problems with providing utility services, such as electricity, gas, or propane. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, and as the General Plan discourages problems associated with providing utility services, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts.
d.	☐	☐	☒	Are there any other known service problem areas (e.g., solid waste)? There is an overall shortage in the County's landfill facilities.

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e. ☐ ☐ ☒ Would the project result in 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 public services or facilities (e.g., fire protection, police protection, schools, parks, roads)?
The proposed ordinance would not be expected to result in impacts from 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 public services or facilities (e.g., fire protection, police protection, schools, parks, roads). Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, the granting of a reasonable accommodation is not likely to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, necessitate 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 public services or facilities.

f. ☐ ☐ ☐ Other factors? _____

STANDARD CODE REQUIREMENTS
☒ Plumbing Code Ordinance No. 2269 ☒ Water Code Ordinance No. 7834

☐ **MITIGATION MEASURES / ☐ OTHER CONSIDERATIONS**
☐ Lot Size ☐ Project Design

The above analysis is undertaken to determine if the proposed ordinance may have a significant impact to utilities or other services, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to public services in the area subject to the proposed ordinance was evaluated based on review of the County of Los Angeles (County) General Plan, the County of Los Angeles web site and expert interviews.

The analysis concludes that the proposed ordinance will not result in significant impacts on utilities or other services. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

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The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health), and regulations related to water quality, supply, and solid waste disposal per Title 25 CCR §770, §772, §774, and §742.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) relative to **utilities/services**?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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OTHER FACTORS - 1. General

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Will the project result in an inefficient use of energy resources? The proposed ordinance would not be expected to result in an inefficient use of energy resources. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to use energy efficiently, a reasonable accommodation is not likely to result in such activities.
b.	☐	☐	☒	Will the project result in a major change in the patterns, scale, or character of the general area or community? The proposed ordinance would not be expected to result in a major change in the patterns, scale or character of the general area or community. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to preserve the patterns, scale or character of areas and communities, a reasonable accommodation is not likely to result in a such activities.
c.	☐	☐	☒	Will the project result in a significant reduction in the amount of agricultural land? The proposed ordinance would not be expected to result in a significant reduction in the amount of agricultural land. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to encourage the preservation of agricultural land, a reasonable accommodation is not likely to result in a significant reduction in the amount of agricultural land.
d.	☐	☐	☐	Other factors? _____

STANDARD CODE REQUIREMENTS

☐ State Administrative Code, Title 24, Part 5, T-20 (Energy Conservation)

☐ **MITIGATION MEASURES** / ☒ **OTHER CONSIDERATIONS**

☐ Lot size ☐ Project Design ☐ Compatible Use

The above analysis is undertaken to determine if the proposed to the zoning code may have a significant impact on the environment, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to public services in the area subject to the proposed ordinance was evaluated based on review of the County of Los Angeles (County) General Plan the County of Los Angeles web site, and expert interviews.

The analysis concludes that the proposed ordinance will not result in significant impacts on utilities or other services

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that would create hazards from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death. This is due to the following:

The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health), and regulations related to water quality, supply, and solid waste disposal per Title 25 CCR §770, §772, §774, and §742.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to any of the above factors?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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OTHER FACTORS - 2. Environmental Safety

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Are any hazardous materials used, transported, produced, handled, or stored on-site?

The proposed ordinance would not be expected to result in impacts from hazards and hazardous materials with respect to creating a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials. Hazardous wastes are by-products that can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous wastes possess at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appear on special Environmental Protection Agency (EPA) lists. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to discourage such activities in proximity to residential uses, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts. In addition, future requests for *reasonable accommodation* will require appropriate permits from the County Departments of Fire, Public Health (Environmental Health), and Public Works, as applicable.

b.	☐	☐	☒	Are any pressurized tanks to be used or any hazardous wastes stored on-site?

The proposed ordinance would not be expected to result in impacts from pressurized tanks being used or any hazardous wastes being used on-site. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to discourage such activities in proximity to residential uses, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts. In addition, future requests for *reasonable accommodation* will require appropriate permits from the County Departments of Fire, Public Health (Environmental Health), and Public Works, as applicable.

c.	☐	☐	☒	Are any residential units, schools, or hospitals located within 500 feet and potentially adversely affected?

The proposed ordinance would not be expected to result in impacts from residential units, schools, or hospitals located within 500 feet and potentially adversely affected with respect to creating a significant hazard to the public or the environment. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to discourage such activities in proximity to residential uses, schools and hospitals, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts. In addition, future requests for *reasonable accommodation* will require appropriate permits from the County Departments of Fire, Public Health (Environmental Health), and Public Works, as applicable.

d.	☐	☐	☒	Have there been previous uses that indicate residual soil toxicity of the site or is the

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site located within two miles downstream of a known groundwater contamination source within the same watershed?
The proposed ordinance would not be expected to result in locating a reasonable accommodation in areas with or within two miles downstream of a known groundwater contamination source within the same watershed. There are sites with soil toxicity problems and known groundwater contamination sources throughout the unincorporated areas of Los Angeles County. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to discourage such activities, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts. In addition, future requests for *reasonable accommodation* will require appropriate permits from the County Departments of Fire, Public Health (Environmental Health), and Public Works, as applicable.

e. ☐ ☐ ☒ Would the project create a significant hazard to the public or the environment involving the accidental release of hazardous materials into the environment?
The proposed ordinance would not be expected to result in impacts from hazards and hazardous materials with respect to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to discourage such activities, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts. In addition, future requests for *reasonable accommodation* will require appropriate permits from the County Departments of Fire, Public Health (Environmental Health), and Public Works, as applicable.

f. ☐ ☐ ☒ Would the project emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
The proposed ordinance would not be expected to result in impacts from hazards and hazardous materials with respect to the emission of hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to discourage such development in such areas, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts. In addition, future requests for *reasonable accommodation* will require appropriate permits from the County Departments of Fire, Public Health (Environmental Health), and Public Works, as applicable.

g. ☐ ☐ ☒ Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment?
The proposed ordinance would not be expected to result in impacts related to being located on a site that is included on a list of hazardous materials sites, creating a significant hazard to the public of the environment. According to the California Department of Toxic Substances Control, there are an estimated 694 sites in Los Angeles County that are either contaminated

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or potentially contaminated (Source: EnviroStor). It is possible that reasonable accommodations may be associated with a residential use located these sites once site clean-up and the necessary site remediation are completed. Future requests for *reasonable accommodation* will require appropriate permits from the County Departments of Fire, Public Health (Environmental Health), and Public Works, as applicable. In addition, future requests for reasonable accommodations are subject to project-level CEQA, as applicable. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to discourage development in such areas, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts.

h. ☐ ☐ ☒ Would the project result in a safety hazard for people in a project area located within an airport land use plan, within two miles of a public or public use airport, or within the vicinity of a private airstrip?

The proposed ordinance would not be expected to result in impacts from hazards and hazardous materials due to the area affected by the proposed policy being located in the vicinity of a private airstrip, resulting in the potential for safety hazards for people residing or working in the area affected by the proposed ordinance. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to discourage development in such areas, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts.

I. ☐ ☐ ☒ Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed ordinance would not be expected to result in impacts from hazards and hazardous materials from impairing the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed ordinance does not alter, reference, or provide guidance regarding the implementation of an emergency plan, nor would the ordinance allow reasonable accommodations to physically interfere with an emergency plan. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, if any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to encourage adequate emergency response, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts.

j. ☐ ☐ ☐ Other factors? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**
☐ Toxic Clean up Plan

The above analysis is undertaken to determine if the proposed ordinance may have a significant impact on environmental safety, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for the impacts related to hazards and hazardous materials in the area subject to the proposed ordinance were evaluated based on expert opinion supported by facts, review of environmental databases, and the County of Los Angeles

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(County) General Plan.

The analysis concludes that the proposed ordinance will not result in significant impacts on environmental safety that would create hazards from exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).
>
> *The ordinance has limited applicability*. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.
>
> *There are existing measures in place that limit any potential impacts.* All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health), and regulations related to water quality, supply, and solid waste disposal per Title 25 CCR §770, §772, §774, and §742.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact relative to **public safety**?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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OTHER FACTORS - 3. Land Use

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☒	☐	Can the project be found to be inconsistent with the plan designation(s) of the subject property? The proposed ordinance could not found to be inconsistent with the plan designation. The proposed ordinance is a program of the 2008 Housing Element of the General Plan. Future requests for *reasonable accommodation* cannot fundamentally alter the nature of the land use and zoning program, which would include the General Plan.
b.	☐	☐	☒	Can the project be found to be inconsistent with the zoning designation of the subject property? The proposed ordinance would not be expected to allow for a reasonable accommodation that is inconsistent with a zoning designation. Future requests for reasonable accommodation are subject to project-level CEQA, as applicable. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, a reasonable accommodation is not likely to be inconsistent with the zoning designation(s) of the subject property.
c.				Can the project be found to be inconsistent with the following applicable land use criteria:
	☐	☐	☒	Hillside Management Criteria?
	☐	☐	☒	SEA Conformance Criteria?
	☐	☐	☐	Other? *N/A*
d.	☐	☐	☒	Would the project physically divide an established community?

The proposed ordinance would not be expected to result in impacts to land use and planning through the physical division of an established community. The proposed ordinance does not alter, reference, or provide guidance regarding the development of circulation elements that may affect a community's connectivity. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan contains policies to encourage neighborhood character, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts.

e.	☐	☐	☐	Other factors? *N/A*

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**

The above analysis is undertaken to determine if the proposed ordinance may have a significant impact on the land use, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to land use and

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planning in the area subject to the proposed ordinance was evaluated in light of the adopted published maps, adopted General Plan and Housing Element, and in coordination with U.S. Fish and Wildlife and California Department of Fish and Game, with regard to the applicable proposed or adopted land use plans and regulations.

The anlysis conlcudes that the proposed ordinance will not result in significant impacts on land use. This is due to the following:

> *The ordinance is not likely to facilitate new development*. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).
>
> *The ordinance has limited applicability*. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.
>
> *There are existing measures in place that limit any potential impacts.* All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health), and regulations related to water quality, supply, and solid waste disposal per Title 25 CCR §770, §772, §774, and §742.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **land use** factors?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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OTHER FACTORS - 4. Population/Housing/Employment/Recreation

SETTING/IMPACTS

	Yes	No	Maybe	
a.	☐	☐	☒	Could the project cumulatively exceed official regional or local population projections? The proposed ordinance would not be expected to result in cumulative impacts to exceed regional or local population projections. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through a project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan is based on population projections, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts.
b.	☐	☐	☒	Could the project induce substantial direct or indirect growth in an area (e.g., through projects in an undeveloped area or extension of major infrastructure)? The proposed ordinance would not be expected to induce direct or indirect growth in an area through for example, projects in an undeveloped area or extension of major infrastructure. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan is based on population projections, a reasonable accommodation is not to allow a project with these characteristics or create significant impacts.
c.	☐	☐	☒	Could the project displace existing housing, especially affordable housing? The proposed ordinance would not be expected to displace existing housing, including affordable housing. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, it should be noted that a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan is based on population projections, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts.
d.	☐	☐	☒	Could the project result in a substantial job/housing imbalance or substantial increase in Vehicle Miles Traveled (VMT)? The proposed ordinance would not be expected to result in a substantial jobs/housing imbalance or substantial increase in VMTs. Future requests for *reasonable accommodation* are subject to project-level CEQA review, as applicable. Therefore, any impacts related to the above would be addressed through project-level CEQA review and mitigation may be required. However, a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan official population projections, a reasonable accommodation is not likely to allow a project with these characteristics or create significant impacts. Due to the limited scope of the ordinance, it is unlikely that a reasonable accommodation will result in substantial job/housing imbalance or a substantial increase in VMT.
e.	☐	☐	☒	Could the project require new or expanded recreational facilities for future residents? The proposed ordinance would not result in impacts to population and housing that would require new or expanded recreational facilities. The ordinance is limited to providing fair and equal access to residential uses, and is not related to recreational uses.

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f. ☐ ☐ ☒ Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?
The proposed ordinance would not be expected to result in impacts to population and housing in relation to the displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. The proposed ordinance would codify a reasonable accommodation procedure in compliance with the state and federal Fair Housing law. Due to the limited scope of the ordinance, a reasonable accommodation is not likely to result in the displacement of substantial numbers of people.

g. ☐ ☐ ☐ Other factors? _____

☐ **MITIGATION MEASURES / ☒ OTHER CONSIDERATIONS**

The above analysis is undertaken to determine if the proposed ordinance may have a significant impact on population, housing, employment or recreation, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State of California Environmental Quality Act (CEQA) Guidelines. The potential for impacts related to population and housing in the area subject to the proposed ordinance was evaluated with regard to state, regional, and local data and forecasts for population, employment and housing, and the anticipted incidence of reasonable accommodations, per empirical data from this and other local juridisctions.

The anlaysis concludes that the proposed ordinance will not result in significant impacts on population, housing, employment or recreation. This is due to the following:

The ordinance is not likely to facilitate new development. The project is a proposed amendment to the zoning code to create a discretionary procedure for persons with disabilities to request reasonable accommodation, pursuant to state and federal Fair Housing laws. Requests for *reasonable accommodation* will be considered through a staff-level, administrative review. Based on research of the County's and other local jurisdictions' experience, the accommodations granted are likely to be modifications to standards or procedures that have no impact on the physical environment. Most *reasonable accommodation* requests are likely to be for the construction of alternative access for single family homes, such as wheel chair ramps, elevator shafts, etc. Requests for *reasonable accommodation* that meet the requirements of Section 15301 (Existing Facilities) or Section 15303 (New Construction or Conversion of Small Structures) of the Public Resources Code are exempt from project-level environmental review under the California Environmental Quality Act (CEQA).

The ordinance has limited applicability. A *request for a reasonable accommodation* will be approved or denied pursuant to the following findings: that the accommodation is necessary for a person with a disability to have fair and equal access to housing; that the request will not be a fundamental alteration to the nature of the land use and zoning program; and that the request does not result in an undue financial or administrative burden to the County. These findings ensure that existing policies and standards that minimize risks to life and property such as those outlined in the General Plan, are not fundamentally altered in order to grant a reasonable accommodation.

There are existing measures in place that limit any potential impacts. All future requests for *reasonable accommodations* are subject to project-level CEQA review, as applicable. Therefore, if a *reasonable accommodation* would be located within in close proximity to a significant hazard or create impacts, project-level CEQA review would address the impacts, and mitigation may be required. In addition, future requests for *reasonable accommodation* are subject to applicable County codes and policies, including approvals from the Los Angeles County Departments of Regional Planning, Public Works, Fire, and Public Health (Environmental Health), and regulations related to water quality, supply, and solid waste disposal per

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Title 25 CCR §770, §772, §774, and §742.

It is important to note that requests for reasonable accommodation are evaluated on a case-by-case basis. As such, the number, location, specific characteristics and environmental impacts of requests are unforseeable. Nonetheless, the limited applicability and required findings, in addition to the fact that each request for reasonable accommodation will be subject to project-level CEQA review, minimize the potential for impacts on the physical environment.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the physical environment due to **population, housing, employment**, or **recreational** factors?

☐ Potentially significant ☐ Less than significant with project mitigation ☒ Less than significant/No impact

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MANDATORY FINDINGS OF SIGNIFICANCE

Based on this Initial Study, the following findings are made:

	Yes	No	Maybe	
a.	☐	☒	☐	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? The project is a proposed amendment to the zoning code to provide a discretionary procedure for requests for *reasonable accommodation* for residential uses, and may result in the granting of a reasonable accommodation to a policy, procedure, or standard in the General Plan and Zoning Code. As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program, and as the General Plan protects natural habitats and environmentally sensitive areas, a reasonable accommodation is not likely to result in the substantial degradation of the quality of the environment, the substantial reduction of the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, nor eliminate important examples of the major periods of California history of prehistory.
b.	☐	☒	☐	Does the project have possible environmental effects which are individually limited but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Given the limited scope of the ordinance, and the findings required to grant a reasonable accommodation, it is unlikely that reasonable accommodations can result in cumulatively considerable environmental effects.
c.	☐	☒	☐	Will the environmental effects of the project cause substantial adverse effects on human beings, either directly or indirectly? As a reasonable accommodation cannot fundamentally alter the nature of the land use and zoning program and as the General Plan protects people from adverse impacts, a reasonable accommodation is not likely to have such impacts.

CONCLUSION

Considering the above information, could the project have a significant impact (individually or cumulatively) on the environment?

☐ Potentially significant ☐ Less than significant with project mitigation

☒Less than significant/ No impact

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COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING
320 WEST TEMPLE STREET
LOS ANGELES, CA 90012

NEGATIVE DECLARATION

PROJECT NUMBER: R2010-00416
CASE: RADV T2010-000017

1. DESCRIPTION: The project is a proposed ordinance amending Title 22 (Planning and Zoning) and Title 21 (Subdivisions) of the Los Angeles County Code related to reasonable accommodations for persons with disabilities. The proposed ordinance creates a discretionary administrative procedure for reasonable accommodation, which is defined as a waiver or modification to regulations, policies, procedures and standards that may be reasonable and necessary for a person with a disability to have an equal opportunity to use and enjoy a residential use, consistent with state and federal fair housing laws.

2. LOCATION: All unincorporated areas of Los Angeles County

3. PROPONENT: Included as a program in the Los Angeles County Housing Element, which was adopted by the Board of Supervisors on August 5, 2008 and certified by the State Department of Housing and Community Development on November 6, 2008.

4. FINDINGS OF NO SIGNIFICANT IMPACTS: Based on the initial study, it has been determined that the project will not have a significant effect on the environment.

5. THE LOCATION AND CUSTODIAN OF THE RECORD OF PROCEEDINGS ON WHICH ADOPTION OF THIS NEGATIVE DECLARATION IS BASED:

Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

PREPARED BY: Gretchen Siemers, AICP
Housing Section

DATE: January 19, 2011

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

Leroy D. Baca, Sheriff

February 17, 2011

Mr. Gretchen Siemers
Los Angeles County
Department of Regional Planning
Housing Section
320 West Temple Street
Los Angeles, California 90012

Dear Mr Siemers:

REVIEWED COMMENTS
REASONABLE ACCOMMODATION ORDINANCE
COUNTY PROJECT NO. R2010-00416
(FPB NO. 11-001)

This letter is transmitted in response to your Notice of Consultation (NOC), dated January 19, 2011, for a Negative Declaration (ND) and Draft Initial Study (IS) on a proposed ordinance (Ordinance) that will amend Titles 21 and 22 of the Los Angeles County Code (County Code). The proposed Ordinance will create discretionary administrative procedures for individuals with disabilities to request reasonable accommodations from planning and land use regulations in order to obtain equal opportunity to use and enjoy a residential use.

According to the ND/IS (see *Project Description*), the proposed Ordinance will apply only to residential land uses in unincorporated Los Angeles County territory. Conversely, per your conversation on February 2, 2011, with Mr. Lester Miyoshi, of my staff, the proposed Ordinance will not apply to non-residential land uses in unincorporated Los Angeles County territory, including any non-residential land use located in any mixed-use zone that permits residential development. Such non-residential land uses will continue to be subject to the regulations, policies, procedures and standards related to reasonable accommodation, as currently constituted in the County Code.

Based upon our review of the ND/IS for the proposed Ordinance, the Los Angeles County Sheriff's Department (LASD) does not have any comments to submit at this time. However, LASD reserves the right to further address this matter in the future as Titles 21 and 22 of the County Code are implemented.

Thank you for including LASD in the environmental review process for the proposed Ordinance. Should you have any questions of LASD/FPB on this matter, please contact Mr. Miyoshi at (626) 300-3012, and refer to FPB Tracking No. 11-001. Mr. Miyoshi may also be contacted via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T. K. Tse, Director
Facilities Planning Bureau

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

Attachment 5
Letter from LA County Fire Dept.

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

MAR 30 2011

March 21, 2011

Gretchen Siemers, Staff Member
Department of Regional Planning
Housing Section
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Siemers:

NEGATIVE DECLARATION, NOTICE OF CONSULTATION, PROJECT NO. R2010-00416, REASONABLE ACCOMMODATION ORDINANCE, ALL UNINCORPORATED AREAS, LOS ANGELES COUNTY (FFER #201100007)

The Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We have no comments at this time.

LAND DEVELOPMENT UNIT:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on our ability to protect life and property as the County of Los Angeles Fire Department.

2. Any proposed development must comply with all applicable codes and ordinances requirements for construction, access, water mains, fire protection systems, fire flows and fire hydrants. Specific fire and life safety requirements for construction will be addressed during the building fire plan check process prior to building permit issuance.

3. The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this ordinance. Should any questions arise, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Juan Padilla, at (323) 890-4243 or jpadilla@fire.lacounty.gov

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:lj

DRAFT RESOLUTION
REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES

WHEREAS, the Regional Planning Commission of the County of Los Angeles conducted a public hearing on February 23, and May 25, 2011 on amendments to Title 21 (Subdivisions) and Title 22 (Planning and Zoning) of the Los Angeles County Code relating to reasonable accommodations for individuals with disabilities.

WHEREAS, the commission finds as follows:

1. The Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act prohibit cities and counties from discriminating against individuals with disabilities through land use and zoning decisions and procedures. Discrimination includes the failure or refusal to provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal opportunity to housing.

2. On August 5, 2008, the Los Angeles County Board of Supervisors adopted the 2008-2014 Los Angeles County Housing Element. The Housing Element contains a program, *Program 2: Removal of Governmental Constraints,* to amend the zoning code to include a procedure for granting reasonable accommodation.

3. The proposed ordinance supports *Housing Availability, Goal 1 of the 2008-2014 Los Angeles County Housing Element*: "a wide range of housing types in sufficient supply to meet the needs of current and future residents, particularly persons with special needs, including but not limited to low income households, seniors, persons with disabilities, single-parent households, the homeless and at-risk homeless, and farmworkers," in that it provides a process to request and obtain reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal opportunity to housing.

4. The proposed ordinance supports *Housing Affordability, Goal 4 of the 2008-2014 Los Angeles County Housing Element*: "a housing delivery system that provides assistance to those with low and moderate incomes and those with special needs," in that it provides a systematic procedure for providing reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal opportunity to housing.

5. The proposed ordinance supports *Equal Opportunity, Goal 1 of the Los Angeles County Housing Element:* "accessibility to adequate housing for all persons without discrimination in accordance with federal and state fair housing laws," in

that it provides a procedure consistent with the Federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act.

6. The proposed ordinance supports *General Policies, Human Resources Development, Goal 1 of the 1980 General Plan:* "eradicate discrimination in housing, jobs and income, education, recreation, and other facets of living; and guarantee equal opportunity in order to promote individual and group development," in that it facilitates fair housing access.

7. The proposed ordinance supports *General Policies, Human Resources Development, Goal 3 of the 1980 General Plan:* "maximize individual and family self-support and reduce the need for institutional treatment of needy, disabled, and handicapped people by providing adequate services and facilities in the community," by providing a process to request and obtain reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal opportunity to housing

8. The proposed ordinance supports *General Policies, Housing and Community Development, Goal 46 of the 1980 General Plan:* "promote open and free choice of housing for all," in that it provides a procedure for persons with disabilities to obtain fair housing access.

9. The proposed ordinance is consistent with the Federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act by providing a process to request reasonable accommodation at no cost, because there is no fee associated with the procedure.

10. An initial study was prepared for the proposed ordinance in compliance with the California Environmental Quality Act, which demonstrates that there is no substantial evidence that the amendments will have a significant impact on the environment. Based on the initial study, the Department of Regional Planning has prepared a Negative Declaration for this project.

11. Upon notice duly provided pursuant to California Government Code §65090 and 22.64.174 of the Los Angeles County Code, the Regional Planning Commission held a public hearing on the proposed Reasonable Accommodation Ordinance on February 23, 2011.

THEREFORE, BE IT RESOLVED THAT the Regional Planning Commission recommends to the Board of Supervisors of the County of Los Angeles as follows:

1. That the Board hold a public hearing to consider the proposed amendments to Title 21 and Title 22 of the Los Angeles County Code to establish a reasonable accommodation procedure;

2. That the Board adopt the attached Negative Declaration and find that there is no substantial evidence that proposed amendments to Title 21 and Title 22 may have a significant effect on the environment; and

3. That the Board adopts the draft ordinances as recommended by this Commission and amend Title 21 and Title 22 accordingly, and determine that the amendments are consistent with the goals and policies of the Los Angeles County General Plan.

I hereby certify that the foregoing resolution was adopted by the Regional Planning Commission of the County of Los Angeles on May 25, 2011.

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Rosie O. Ruiz, Secretary
Regional Planning Commission
County of Los Angeles