
Certified Housing Element Update Program
Environmental Impact Report

Housing Ordinances Update Addendum

OCTOBER 2025

Prepared for:

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADU	accessory dwelling unit
AHPO	Affordable Housing Preservation Ordinance
CEQA	California Environmental Quality Act
County	County of Los Angeles
DBO	Density Bonus Ordinance
EIR	Environmental Impact Report
GHG	greenhouse gas
HCD	California Department of Housing and Community Development
HOU	Housing Ordinances Update
IHO	Inclusionary Housing Ordinance
ISHO	Interim and Supportive Housing Ordinance
MM	Mitigation Measure
PEIR	Program Environmental Impact Report
PRC	California Public Resources Code
RHNA	Regional Housing Needs Allocation
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
SDBL	State Density Bonus Law
VMT	vehicle miles traveled

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1 Introduction

1.1 Project Overview

The Final Program Environmental Impact Report (PEIR) for the 6th Cycle (2021–2029) Los Angeles County Housing Element Update (Housing Element Update PEIR) was certified by the County of Los Angeles (County) Board of Supervisors on November 30, 2021 (County of Los Angeles 2021). The Housing Element Update PEIR was prepared by the County pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.) and the Guidelines for the Implementation of CEQA (California Code of Regulations Title 14, Section 15000 et seq.) (CEQA Guidelines) to assess the environmental effects that would result from implementation of the Housing Element Update. The California Department of Housing and Community Development (HCD) determined on April 25, 2022, that the County’s Draft Housing Element Update will meet all applicable statutory requirements, including State Housing Element Law (California Government Code Sections 65580–65589.8), with revisions adopted and submitted to HCD, pursuant to California Government Code Section 65585 (HCD 2022). On May 17, 2022, the County Board of Supervisors adopted the updated Housing Element (2021–2029) and determined that the Housing Element Update is within the scope of impacts analyzed by the previously certified Housing Element Update PEIR. The 2021–2029 Housing Element was certified by HCD on May 27, 2022.

The purpose of this Addendum to the Housing Element Update PEIR (Addendum) is to assess the significance of any environmental impact differences between the proposed Housing Ordinances Update (HOU) and the 2021–2029 Housing Element that was adopted in May 2022. This Addendum determines whether and to what extent the Housing Element Update PEIR is sufficient for addressing the potential environmental impacts of the HOU. The HOU proposes amendments to Title 21, Subdivisions, and Title 22, Planning and Zoning, of the Los Angeles County Code (County Code), which can be generally summarized as including the following:

- Amendments to codify state laws and executive orders into the County Code.
- Amendments to the density bonus and incentives sliding scales in the Density Bonus Ordinance (DBO) (Chapter 22.120 of Title 22).
- Amendments to update or revise language in the existing Housing Ordinances for clarity, consistency, or harmonization.

Based on substantial evidence, the County determined that preparation of an Addendum, in accordance with CEQA Guidelines Section 15164, is the appropriate environmental documentation for the HOU. While the amendments to the DBO would result in a change in the number and the location of density bonus units, the change would be within the assumptions analyzed in the Housing Element Update PEIR and would not result in additional density bonus units exceeding the number of units already analyzed in the Housing Element PEIR. Moreover, there would be no new or more severe environmental impacts resulting from the proposed amendments to the other housing ordinances through this Project.

The HOU would not require substantial changes to the Housing Element Update PEIR due to the involvement of new significant effects or a substantial increase in the severity of previously identified effects, or due to substantial changes in circumstances; would not result in new significant effects; would not result in substantially more severe significant environmental effects; and would not require new mitigation measures or new alternatives. Thus, neither

a subsequent nor supplemental Environmental Impact Report (EIR) is required (PRC Section 21166; CEQA Guidelines Sections 15162 and 15163).

However, some changes or additions, as described in Chapter 2, Project Description, are necessary to the Housing Element Update PEIR in order to implement the HOU, making this Addendum the appropriate CEQA document for the HOU (PRC Section 21166; CEQA Guidelines Sections 15162–15164).

This Addendum is organized in the following chapters:

Chapter 1, Introduction. Chapter 1 describes the purpose and organization of this document. The introduction includes applicable statutory sections of the PRC and CEQA Guidelines, a brief history of the HOU, and a summary of the Housing Element Update PEIR.

Chapter 2, Project Description. Chapter 2 describes the HOU, including its characteristics and objectives. HOU characteristics are discussed in the context of the current requirements and the changes to these requirements that would be implemented with the HOU.

Chapter 3, Environmental Analysis. Chapter 3 provides an environmental analysis of the HOU compared to the analysis and findings of the Housing Element Update PEIR. It presents an analysis of the environmental factors identified in the County’s Guidelines for Thresholds of Significance, consistent with Appendix G of the CEQA Guidelines, determining for each factor whether the circumstances set forth in PRC Section 21166 and its implementing CEQA Guidelines Sections 15162 and 15163, governing when preparation of a subsequent EIR or supplemental EIR is required, are present with respect to the HOU or the situation surrounding the HOU.

Chapter 4, References and Preparers. Chapter 4 provides a list of references used in the preparation of this Addendum, and identifies the people involved in its preparation and review.

1.2 Project Background

1.2.1 State Housing Element Law

State Housing Element Law (California Government Code Article 10.6) mandates that a Housing Element be included as one of the seven required elements contained in a city or county’s General Plan (per the Government Code, beginning at Section 65583). The Housing Element Law acknowledges that, in order for the private market to adequately address the housing needs and demand of Californians, local governments must adopt plans and regulatory systems that provide opportunities for (and do not unduly constrain) housing development. Jurisdictions must update their Housing Elements based on the update schedule of the relevant regional transportation plan of the federally designated Metropolitan Planning Organization. The County is a member of the Southern California Association of Governments (SCAG), which is the designated Metropolitan Planning Organization for the region. SCAG is required to update its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) every 4 years, which puts all member jurisdictions on a schedule to update their Housing Elements every 8 years. The SCAG Regional Council adopted Connect SoCal (SCAG’s 2020–2045 RTP/SCS) on September 3, 2020 (SCAG 2020). For SCAG member jurisdictions, the 6th Cycle Housing Element planning period extends from 2021 to 2029.

As part of Connect SoCal, SCAG assigns a number of housing units that each county is required to plan for in the 8-year Housing Element cycle. That number of units is called the Regional Housing Needs Allocation (RHNA), and it

is broken down by income category, ensuring that all economic groups are accommodated (SCAG 2020). The unincorporated County was assigned an RHNA of 90,052 dwelling units for the 2021–2029 Housing Element planning period. The County adopted the Housing Element Update for the 2021–2029 6th Cycle planning period to address the RHNA requirements and certified the Final Housing Element Update PEIR on November 30, 2021. The Final Housing Element Update PEIR analyzed the potential environmental effects of the certification of the Housing Element Update on a programmatic level (County of Los Angeles 2021). The County then adopted the Housing Element for the 2021–2029 6th Cycle planning period on May 17, 2022, pursuant to HCD’s request to provide additional information explaining and clarifying certain facets of the Housing Element Update (County of Los Angeles 2022a, 2022b). The HCD certified the Final Housing Element on May 27, 2022. The County determined that the Housing Element Update was within the scope of the previously certified Final Housing Element Update PEIR and that no further analysis would be required.

1.2.2 Housing Element Update

The Housing Element Update was prepared by the County for the 2021–2029 planning period. Generally, state law mandates updates to Housing Elements every 8 years. The planning period for a Housing Element update is determined for the County by the adoption of SCAG’s RTP/SCS. For SCAG member jurisdictions, the 6th Cycle Housing Element planning period extends from 2021 to 2029 (SCAG 2020). The Housing Element serves as a policy guide to address the comprehensive housing needs of the unincorporated areas of Los Angeles County (unincorporated areas). The primary focus of the Housing Element is to ensure that the County can provide safe, decent, sanitary, and affordable housing at adequate densities in the unincorporated areas to accommodate its fair share of the RHNA. The Housing Element Update included a Sites Inventory;¹ a Rezoning Program²; an analysis of constraints and barriers; goals, policies, and implementation programs; amendments to Title 22 of the County Code; and amendments to the General Plan Land Use Element.

The Housing Element Update PEIR provides a programmatic analysis of the potential impacts of buildout of the Housing Element Update (County of Los Angeles 2021). In conjunction with certification of the Final PEIR on November 30, 2021, the County Board of Supervisors also adopted the Findings of Fact, a Mitigation Monitoring and Reporting Program, and a Statement of Overriding Considerations. The CEQA Findings adopted by the County indicated that the Housing Element Update would result in certain significant environmental impacts that could not be fully avoided through implementation of feasible mitigation measures. These include impacts to air quality, cultural resources, noise and vibration, and transportation. Information and technical analyses from the Housing Element Update PEIR are summarized throughout this Addendum. The entire Housing Element Update PEIR is available for review online at <https://planning.lacounty.gov/long-range-planning/housing-element/>.

1.2.3 State Density Bonus Law and the Density Bonus Ordinance

The State Density Bonus Law (SDBL) (California Government Code Sections 65915–65918) requires a city or county to provide a housing developer with a density bonus to maximize the residential density of a proposed

¹ The Sites Inventory is a list of available sites, included in the Housing Element as required by state law, that meet certain criteria. The Sites Inventory is used to demonstrate that there are enough sites with adequate densities to accommodate the RHNA at each income level.

² As the Sites Inventory falls short of the goal to accommodate the RHNA, the Housing Element Update includes a rezoning program, as required by State law.

residential development project. To accomplish this, Government Code Sections 65915–65918 describe how a local government can incentivize developers and applicants to add more housing density in their projects.

On October 15, 2019, the County adopted Ordinance No. 2019-0053 to amend Title 21, Subdivisions, and Title 22, Planning and Zoning, of the County Code, to include the DBO, which implements the SDBL and establishes additional local regulations. The 2019 DBO is an update to the County’s 2006 DBO, which reflects changes to the SDBL and goes beyond state law to further encourage and streamline the production of affordable housing. Under the DBO, eligible projects may request a density bonus, the size of which is determined by a sliding scale, based on the percentage of affordable units at each income level. The DBO also offers incentives and concessions for affordable housing or housing for older adults (age-qualified), including reduced parking requirements, waivers or reductions of development standards, and other incentives.

1.2.4 Other Housing Ordinances

Following are other relevant County ordinances related to housing.

Reasonable Accommodation Ordinance. The County adopted Ordinance No. 2011-0067 on November 29, 2011, to amend Title 21, Subdivisions, and Title 22, Planning and Zoning, of the County Code to include the Reasonable Accommodation Ordinance, which establishes procedures for individuals with disabilities to request reasonable accommodations with respect to planning and land use regulations in order to obtain an equal opportunity to access, use, and enjoy housing.

Inclusionary Housing Ordinance (IHO). The County adopted Ordinance No. 2020-0064 on November 10, 2020, to amend Title 22, Planning and Zoning, of the County Code to include the IHO, which establishes an inclusionary housing program in the unincorporated areas. The IHO requires certain rental and for-sale residential developments to set aside a percentage of income-restricted affordable housing units. The IHO also requires a duration of affordability, comparability of set-aside and non-set-aside units, and an option to provide the affordable housing units off site.

Interim and Supportive Housing Ordinance (ISHO). The County adopted Ordinance No. 2021-0017 on April 6, 2021, to amend Title 22, Planning and Zoning, of the County Code to include the ISHO, which encourages development of housing for people experiencing homelessness by streamlining the approval of such development through a ministerial review process and supports temporary vehicle living, where appropriate, in unincorporated areas.

Affordable Housing Preservation Ordinance (AHPO). The County adopted Ordinance No. 2021-0018 on April 6, 2021, to amend Title 8, Consumer Protection, Business and Wage Regulations; Title 21, Subdivisions, and Title 22, Planning and Zoning, of the County Code to include the AHPO, which preserves the County’s supply of existing affordable housing in the unincorporated areas. Specifically, the AHPO builds on existing state mandates such as Senate Bill (SB) 330 (2019) and, among other things, requires certain development projects to replace existing affordable rental housing units (including those that are rent-controlled; deed-restricted; or occupied by lower, very low, or extremely low-income households) that are demolished, vacated, or converted from rental to for-sale with income-restricted affordable rental housing units.

Accessory Dwelling Unit (ADU) Ordinance Amendment. The County adopted Ordinance No. 2025-0029 on July 29, 2025, to amend Title 11, Health and Safety, and Title 22, Planning and Zoning, of the County Code to update

development standards with state statutory requirements for accessory dwelling units (ADUs) and junior accessory dwelling units in the unincorporated areas.

1.3 California Environmental Quality Act Compliance

CEQA recognizes that previously approved projects may require changes, and that any of the following may occur: (1) the project may change, (2) the environmental setting in which the project is set may change, and/or (3) previously unknown information can arise. Before proceeding with a project within the scope of a previously certified EIR, CEQA requires the lead agency to evaluate these changes to determine whether they affect the conclusions in the prior environmental document.

When an EIR has been certified and a project evaluated in a previous EIR is modified or otherwise changed after certification, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in PRC Section 21166 and CEQA Guidelines Sections 15162–15164. CEQA Guidelines Section 15162(a) provides that a subsequent EIR is not required unless any of the following occurs:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; and/or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If a subsequent EIR is not required pursuant to CEQA Guidelines Section 15162(a), then the lead agency determines the appropriate further CEQA documentation, including no further documentation at all (CEQA Guidelines Section 15162[a]). However, if a subsequent EIR is not required pursuant to CEQA Guidelines Section 15162(a), but some changes or additions to the certified EIR have become necessary, an Addendum is required (CEQA Guidelines Section 15164[a]). An Addendum must include a brief explanation of the agency's decision not to prepare a subsequent EIR, supported by substantial evidence in the record (CEQA Guidelines Section 15164[e]). The

Addendum to the EIR need not be circulated for public review, but it may be included in or attached to the Final EIR (CEQA Guidelines Section 15164[c]). The decision-making body must consider the Addendum and the Final EIR prior to making a decision on a project (CEQA Guidelines Section 15164[d]).

The Housing Element Update PEIR analyzed the potential for environmental impacts associated with development of additional affordable housing units, including density bonus units (County of Los Angeles 2021). The proposed HOU would amend the DBO such that more sites could potentially be eligible for a density bonus. Because these additional changes have the potential to alter the buildout of residential units within Los Angeles County, it has been determined that preparation of an Addendum to the Housing Element Update PEIR is the appropriate approach for the HOU. Note that while the Project would also amend other housing ordinances, changes in these other ordinances are either administrative or technical in nature, as described in Section 2.1.1 and 2.1.2 of this Addendum; or, as described in Section 2.1.3, of this Addendum, do not have potential to alter the buildout due to the nature of the proposed change. As such, Section 2.1.4 below describes the proposed changes to the DBO that have the potential to result in environmental impacts.

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☒ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Tina Fung

Signature

10/20/2025

Date

2 Project Description

2.1 Housing Ordinances Update

Los Angeles County is in Southern California, bordered by the Pacific Ocean to the west, and Ventura, Kern, San Bernardino, and Orange Counties to the north, east, and south. The HOU applies to all unincorporated areas within the jurisdiction of the County of Los Angeles Department of Regional Planning.

The HOU would amend Title 21, Subdivisions, and Title 22, Planning and Zoning, of the County Code. The amendments include the following:

1. Amend the DBO to align with changes in the SDBL and expand local bonuses and incentives to incentivize the development of affordable housing, including acutely low-income housing.
2. Amend the IHO with non-substantive and technical changes for clarity and ease of use.
3. Amend the AHPO to align with state law, including the affordable housing replacement requirements from Assembly Bill (AB) 1218 and AB 98.
4. Update definitions of and regulations for various housing types.
5. Amend the Reasonable Accommodation Ordinance to simplify and streamline the reasonable accommodation review process.
6. Update the ISHO to align with state law changes under AB 1801 regarding by-right supportive housing development.
7. Simplify the County Code language, correct errors and omissions, and remove obsolete and redundant regulations across various housing ordinances for clarity and ease of use, including the reorganization of Chapter 22.128, Supportive Housing, and Chapter 22.130, Transitional Housing.

The proposed amendments can be generally categorized as follows: (1) codification of state mandates; 2) administrative County Code updates; 3) County policy-driven updates with no environmental impacts and 4) DBO updates with potential environmental impacts amendments.

2.1.1 Codification of State Mandates

Table 1 provides a summary of the HOU components that would incorporate existing state laws and an executive order into the County Code, as well as the proposed location of the codifications in the County Code.

Table 1. State Mandates Incorporated into County Code

State Mandate	Location in the County Code
AB 2345 (2020) : Codify the state law into the Density Bonus Ordinance, including various changes to the density bonus sliding scale, incentives sliding scale, and eligibility requirements for the expanded bonus units for 100% affordable housing projects and the reduced parking ratios for qualifying projects under the SDBL.	Section 22.14.010 (A) under “Affordable housing and senior citizen housing”: Add definition of “unobstructed access.” Section 22.120.050 (Affordable Housing): Update density bonus sliding scale, incentives, and eligibility. Section 22.120.080 (Parking): Reduce required parking ratios.

Table 1. State Mandates Incorporated into County Code

State Mandate	Location in the County Code
SB 290 (2021) : Codify the state law, which reduces parking ratios for projects with at least 40% for-sale moderate-income housing set-aside within a half-mile of a major transit stop and removes the specified adverse impact on the physical environment from the list of required impact findings for denial of an incentive or waiver of development standards for a project receiving benefits under the SDBL.	Section 22.120.080 (Parking): Reduce required parking ratios. Section 22.166.040 (Administrative Housing Permit): Remove required finding of adverse impact on the physical environment.
SB 728 (2021) : Codify the state law, which provides the option for the initial sale of an affordable housing set-aside unit to a qualified nonprofit housing organization under the SDBL.	Section 22.14.010 (A) under “Affordable housing and senior citizen housing”: Add definition of a “qualified nonprofit housing corporation.” Section 22.120.050 (Affordable Housing): Specify sale requirements for affordable housing set-aside units. Section 22.166.070 (Covenant and Agreement): Specify sale requirements for affordable housing set-aside units that must be included in a covenant and agreement.
AB 1043 (2021) : Codify the state law, which defines “acutely low-income households” for the purpose of defining affordable rent limits.	Section 22.14.090 (I) under “Income”: Add definition for “acutely low income.”
AB 491 (2021) : Codify the state law, which requires comparability between income-restricted units and market-rate units in a mixed-income multi-family structure so that the occupants of the income-restricted units have the same access to common entrances, common areas, and amenities of that structure as the occupants of the market-rate units. The law also prohibits a mixed-income, multi-family structure from isolating the income-restricted units within the structure to a specific floor or an area on a specific floor. These requirements do not apply to a manager’s unit.	Section 22.119.050 (Requirement): Add a reference to Section 22.120.050 for the specific requirements for comparability between affordable housing set-aside units and non-set-aside units. Section 22.120.050 (Affordable Housing): Specify requirements for comparability between affordable housing set-aside units and non-set-aside units. Section 22.121.050 (Affordable Housing Set-Aside): Add a reference to Section 22.120.050 for the specific requirements for comparability between affordable housing set-aside units and non-set-aside units.
SB 8 (2021) : Codify state law in the Affordable Housing Preservation Ordinance, which clarifies that no affordable replacement unit is required for projects consisting of a new single-family residence on a site with no other principal uses or structures, provided that only one existing unit on the site has been or is proposed to be demolished or vacated, because, pursuant to Government Code Section 66300.5(i)(2) (new section number by AB 1218 (2023)), the new single-family residence could be at any income level.	Section 22.119.040 (Exemptions): Add exemption for affordable housing replacement.
AB 682 (2022) : Codify state law, which allows “shared housing buildings” to receive density bonuses and other benefits if certain criteria and requirements under the SDBL are met.	Section 22.14.080 (H): Revise definition of “habitable room” to align with definition of “shared housing unit.”

Table 1. State Mandates Incorporated into County Code

State Mandate	Location in the County Code
	Section 22.14.130 (M) under Multi-Family Housing: Add “shared housing unit” as a type of principal dwelling unit in an “apartment house,” where the apartment house is a shared housing building. Section 22.14.040 (D): include an exception in the definition of a new term “dwelling unit, principal” to account for shared housing units in a shared housing building where the kitchen and dining area are not contained within the dwelling units, Section 22.14.190 (S): Add definition of “shared housing building” and “shared housing unit.”
AB 2334 (2022) : Codify state law, which expands the unlimited density bonus and additional benefits for 100% affordable housing projects from areas within a half-mile of a major transit stop to now also developments within a “very low vehicle travel area,” subject to affordability requirements specified under the SDBL.	Section 22.14.010 (A) under Affordable Housing and Senior Citizen Housing: Add definition of “very low vehicle travel area.” Section 22.120.050 (Affordable Housing): Establish unlimited density bonus and additional benefits for eligible projects.
AB 1287 (2023) : Codify state law, which allows (1) up to five incentives for certain 100% affordable housing projects (previously, a maximum of four incentives were permitted), and (2) up to four incentives and an additional density bonus for projects providing an additional very low- or moderate-income housing set-aside.	Section 22.120.050 (Affordable Housing): Add a new “stackable” density bonus sliding scale for projects providing an additional very low- or moderate-income housing set-aside and revise the allowable number of incentives. Section 22.120.100 (Rules and Calculations): Add exception for cumulative density bonuses.
AB 323 (2023) : Codify state law, which allows the initial sale of affordable housing set-aside units under the SDBL or a local inclusionary housing ordinance to qualified nonprofit housing corporations only if the units have not been purchased by income-qualifying households within 180 days of the issuance of the certificate of occupancy.	Section 22.14.010 (A) under “Affordable Housing and Senior Citizen Housing”: Add definition for a “qualified nonprofit housing corporation.” Section 22.120.050 (Affordable Housing): Specify sale requirements for affordable housing set-aside units. Section 22.121.050 (Affordable Housing Set-Aside): Specify sale requirements for affordable housing set-aside units. Section 22.166.070 (Covenant and Agreement): Specify sale requirements for affordable housing set-aside units that must be included in a covenant and agreement.
AB 1218 (2023) : Codify state law, which requires the actual replacement of demolished units by a new development (and thus limits the County’s ability to allow payment of an in-lieu fee) and limits the option to replace units off site to non-residential projects only. This bill no longer exempts projects in a Very High Fire	Section 21.16.100 (Affordable Housing Replacement): Centralize affordable housing replacement requirements for subdivision projects in Title 21 of the County Code and limit the applicability of the Affordable Housing Replacement Fee to subdivisions that are not subject to AB 1218 (i.e. condominium conversion projects).

Table 1. State Mandates Incorporated into County Code

State Mandate	Location in the County Code
Hazard Severity Zone from SB 330's state-mandated replacement requirements.	Section 22.119.040 (Exemptions): Remove exemption for projects in a Very High Fire Hazard Severity Zone. Add clarification that only certain industrial projects meeting the criteria in the state law are exempt from the affordable housing replacement requirements. Section 22.119.050 (Requirements): Specify requirements for replacement units. Section 22.121.050 (Affordable Housing Set-Aside): Clarify that affordable housing set-aside units required by the Inclusionary Housing Ordinance may only be provided off site if the units are not also used to satisfy the affordable housing replacement requirements.
AB 1308 (2023) : Codify state law, which prohibits local jurisdictions from increasing the minimum parking requirement, as a condition of approval, for single-family residences undergoing remodeling, renovations, and additions, provided that such remodeling, renovations, or additions do not result in the single-family residence exceeding any maximum size limit imposed by applicable zoning regulations, including height, lot coverage, and floor-to-area ratio.	Section 22.300.020 (Application of Planning Area Standards Districts and Community Standards Districts to Property): Add exception for additions to single-family residences in the Planning Area Standards Districts (PASDs) and Community Standards Districts (CSDs) so that such projects would not be subject to the parking requirements specified in the PASDs or CSDs.
SB 1395 (2024) : Codify state law, which includes a new definition of "Low Barrier Navigation Center."	Section 22.14.050 (E): Add a reference to Government Code section 65660 to the definition of "Emergency Shelter," thereby incorporating "Low Barrier Navigation Center" as newly defined in SB 1395 .
AB 1801 (2024) : Codify state law, which specifies that "supportive housing" includes transitional housing for youth and young adults, as well as administrative office space, for purposes of the use-by-right provisions set forth in Government Code sections 65650 through 65656 , and expands the use-by-right provisions in state law to include administrative office space (maximum 25% of the supportive housing development's total floor area) and thus expands the exemption for approval of ministerial projects under the California Environmental Quality Act.	Section 22.128.200 (Supportive Housing Streamlining): Specify that the term "supportive housing" for the purposes of the streamlined ministerial review includes transitional housing for youth and young adults and other non-residential uses and administrative office space.
AB 2694 (2024) : Codify state law, which expands the definition of a senior citizen housing development in the SDBL to include a residential care facility for the elderly and specifies that, in the case of a residential care facility for the elderly, a "shared housing unit" includes a unit without an individual kitchen where a unit may be shared by unrelated persons, and a unit where a room that may be shared by unrelated persons	Section 22.14.010 (A) under "Affordable housing and senior citizen housing": add "residential care facility for the elderly" in the definition of "senior citizen housing development." Section 22.14.190 (S): In the proposed definition of "shared housing unit," specify that, in the case of a residential care facility for the elderly, a "shared housing unit" includes a unit without an individual

Table 1. State Mandates Incorporated into County Code

State Mandate	Location in the County Code
meets the minimum room area requirements, as specified.	kitchen where a unit may be shared by unrelated persons, and a unit where a room that may be shared by unrelated persons meets the minimum room area requirements, as specified.
<u>AB 98 (2024)</u> : Codify state law, which, beginning January 1, 2026, will require an applicant for a logistics use to provide a 2-to-1 replacement of any demolished housing unit that was occupied within the last 10 years or an in-lieu fee, unless the housing unit was declared substandard by a building official.	Section 22.119.060 (Replacement Requirements for Logistics Uses): Add replacement requirements for “logistics use” as defined in Government Code Section 65098.
<u>SB 1211 (2024)</u> : Codify the state law, which increases the maximum number of detached accessory dwelling units (ADUs) on a lot with a multifamily dwelling from two to eight (not to exceed the number of principal units). This bill also prohibits local jurisdictions from requiring the replacement of off-street parking spaces if an uncovered parking space is demolished in conjunction with the construction of, or is converted to, an ADU.	Section 22.140.640 (Accessory Dwelling Units and Junior Accessory Dwelling Units): Increase the maximum number of detached accessory dwelling units permitted on a lot with a multi-family dwelling, and specify that no replacement parking is required if an uncovered parking space is demolished in conjunction with the construction of an ADU or converted into an ADU.
Codify Paragraph 6 of <u>Executive Order (EO) N-23-25</u> , which suspends certain provisions in the SDBL (Government Code Section 65915[b], [d], and [e]) to the extent those provisions would otherwise require the County to grant the use of incentives or waivers or reductions of development standards to modify development standards related to pedestrian character if the housing development is in the Lake Avenue Mixed Use “Center” Area in the Altadena Community Standards District, or on Fair Oaks Avenue within the perimeter of the Eaton Fire.	Section 22.120.100 (Rules and Calculations): Prohibit projects in the Lake Avenue Mixed Use “Center” Area in the Altadena Community Standards District, or on Fair Oaks Avenue within the perimeter of the Eaton Fire from receiving incentives or waivers or reductions of development standards to modify certain development standards as related to pedestrian character.
<u>AB 1529 (2025)</u> : Codify the state law, which clarifies that for certain rental housing development that dedicates at least 80% of units to lower income households, the affordable rent shall not exceed an amount consistent with the maximum rent levels for lower income households, as those rents and incomes are determined by the California Tax Credit Allocation Committee. This revised limit on “affordable rent” will apply to certain one hundred percent affordable housing developments that are subject to the SDBL.	Section 22.14.010 (A) under “Affordable housing and senior citizen housing”: revise definition of “affordable rent.” Section 22.120.050 (Affordable Housing): specify the limit on “affordable rent” for certain one hundred percent affordable housing developments that are subject to the SDBL.
<u>SB 415 (2025)</u> : Codify the state law, which clarifies that nothing in AB 98 limits or precludes compliance with the affordable housing replacement requirements in the Housing Crisis Act (Article 2 (commencing with § 66300.5) of Chapter 12 of the Government Code), and requires a logistics use developer to comply with the Housing Crisis Act’s requirements before complying with any additional replacement requirements imposed by AB 98.	22.119.060 (Replacement Requirements for Logistics Uses): add replacement requirements for logistics use as defined in Government Code Section 65098.

Table 1. State Mandates Incorporated into County Code

State Mandate	Location in the County Code
SB 92 (2025) : Codify the state law, which specifies that an incentive provided by the SDBL shall not result in a proposed project, as prescribed, with a commercial floor area ratio that is greater than two and a half times the premises' current allowed base zone commercial floor area ratio.	22.120.100 (Rules and Calculations): add a provision to specify that an incentive shall not result in a proposed project, as prescribed, with a specified commercial floor area ratio.
AB 1154 (2025) : Codify the state law, which specifies that owner-occupancy requirement would apply only if the junior accessory dwelling unit has shared sanitation facilities with the existing structure.	22.140.640 (Accessory Dwelling Units and Junior Accessory Dwelling Units): Specify that owner-occupancy is required only if the junior accessory dwelling unit has shared sanitation facilities with the single-family residence.
SB 543 (2025) : Codify the state law, which 1) imposes a 15-business-day deadline for a permitting agency to determine whether an ADU or JADU application is complete; 2) clarifies that the floor area specified, such as the maximum 500-square-foot-size for a JADU, refers to "interior livable space;" and 3) limits the timeline for a final determination on an appeal to 60 business days for ADU and JADU applications.	22.14.010 (A): add definition for "floor area" for the purposes of Section 22.140.640 (Accessory Dwelling Units and Junior Accessory Dwelling Units) to align with state law's reference to an "interior livable space." 22.140.640 (Accessory Dwelling Units and Junior Accessory Dwelling Units): update provisions regarding the application review timeline and add a provision on the appeal process including the time limit for a final determination on an appeal.

Notes: County = County of Los Angeles; AB = Assembly Bill; SB = Senate Bill; SDBL = State Density Bonus Law

2.1.2 Administrative County Code Updates

This following list is a summary of the HOU components that are administrative "clean-up" actions that would clarify and/or result in efficiencies for administration of the County Code:

- Correct an error in the definition of a "farmworker dwelling unit," which is a single-family residence accommodating up to six farmworkers. The County Code was revised to eliminate "five or six" and now states "up to six" farmworkers. This change would ensure compliance with [California Health and Safety Code \(Health and Safety Code\) section 17021.5 \(Employee Housing Act\)](#), which requires jurisdictions to permit employee housing for six or fewer employees as a single-family use.
- Correct errors in Table 22.20.030-B, Principal Use Regulations for Commercial Zones, because certain multi-family housing types in the commercial zones were mistakenly omitted in the ISHO, which codified [AB 2162 \(2018\)](#) to allow supportive housing development by right in zones where multi-family and mixed uses are permitted, subject to certain criteria. The corrections would ensure that AB 2162's by-right provision applies to all multi-family housing types that are supportive housing in the commercial zones where multi-family and mixed uses are permitted.
- Expand the definition of "emergency shelters" to align with the definition provided in [AB 2339 \(2022\)](#), which includes other interim interventions, including, but not limited to, navigation centers, bridge housing, and respite or recuperative care.

- Update Chapter 22.119 (Affordable Housing Replacement) to clarify that caretaker residences and farmworker housing complexes containing only beds are exempt from affordable replacement requirements in the AHPO.
- Clarify that only existing, legally established mobilehome parks seeking continued operation with no expansion proposed are eligible for the planning fee exemption provided in Title 22 (a component of the AHPO).
- Update provisions in Chapter 22.166 (Housing Permits) to improve the entitlement process for projects with income-restricted units and the monitoring of income-restricted units.
- Update the definitions of and regulations for certain housing types, as follows:
 - Update definitions for various multi-family housing types, such as townhouses and apartment houses.
 - Add “multiple detached dwelling units on a lot” as a new type of multi-family housing in the use tables of residential, commercial, rural, and mixed-use zones. Although projects with multiple detached dwelling units are currently permitted as “single-family residences” in various zones, the addition of this new term would provide a clear distinction between single-family residences on fee-simple lots (single-family housing) and detached units on a lot (multi-family housing, such as condominium projects). This distinction would improve implementation of the Accessory Dwelling Unit (ADU) Ordinance.
 - Rename “farmworker dwelling unit” to “single-family residence for farmworkers” throughout Title 22.
- Remove density as a type of regulation that can be modified through a Variance (Chapter 22.194) because development intensities should abide by the allowable residential density specified by the General Plan Land Use Legend, with the exception of density bonuses for affordable housing and age-qualified housing.

2.1.3 County Policy-Driven Updates with No Environmental Impacts

The following updates included in the HOU are all policy-driven updates that are administrative in nature and would not result in impacts to the environment:

- Expand the applicability of the reduced parking ratio (0.5 spaces per bedroom) from [SB 290](#) so that any project that is subject to the DBO regardless of tenure would be eligible for this reduced parking ratio if it provides at least 40% moderate-income housing set-aside and is within 0.5 miles of a major transit stop. Under the SDBL, this reduced parking ratio only applies to for-sale housing development that meets the specified set-aside requirement and locational criteria.
- Expand the applicability of [Executive Order N-23-25](#) Paragraph 6 to include incentives and waivers or reductions of development standards provided by IHO Section 22.121.060. Projects that are subject to the IHO would not be able to modify development standards related to pedestrian character with these incentives or waivers or reductions of development standards if they are located in the Lake Avenue Mixed Use “Center” Area in the Altadena Community Standards District, or on Fair Oaks Avenue within the perimeter of the Eaton Fire.
- Expand the applicability of [SB 92](#) to include incentives provided by the IHO in Section 22.121.060. Projects that are subject to the IHO would not be able to use an incentive provided by the IHO to modify development standards that would result in a proposed project with a commercial floor area ratio that is greater than two and a half times the premises’ current allowed base zone commercial floor area ratio.

- Harmonize various requirements across IHO, DBO, AHPO, and ISHO provisions on permanent motel conversions for consistency, clarity, and ease of implementation. These updates would provide clarity on affordable housing set-aside and density bonus calculations, and ensure consistency across regulations on various topics, such as the location and distribution of income-restricted units within a housing development, the duration of affordability, the comparability between building materials for income-restricted and non-income-restricted units, sale requirements for income-restricted units, and the timing for the issuance of certificate of occupancy for income-restricted units.
- Update the AHPO (Chapter 22.119) with the following local policy-driven changes:
 - Make several updates to the AHPO to provide more clarity and flexibility related to applicants exiting the rental market under the Ellis Act. Specifically, the updates would allow affordable replacement units to be either rental or for sale, revising the existing local policy that requires affordable replacement units for households of lower income or below to be rental only.
 - Require affordable housing replacement for certain rental units that will be withdrawn from the rental market – even those that are rented throughout the entitlement process – under the Ellis Act (Gov. Code § 7060, et seq.). This action would close a current loophole in the regulations as both state law and the current County Code only require affordable housing replacement if a unit was withdrawn from rent or lease within the past 10 years.
 - Require like-for-like replacement in most cases regarding the number of bedrooms in each affordable replacement unit. Currently, state law does not require like-for-like in terms of the number of bedrooms provided in each replacement unit. State law only requires that units be replaced both in terms of unit count and in the total aggregate number of bedrooms project wide. This action would therefore be more restrictive than state law.
 - Adding locational criteria for off-site affordable replacement units provided by non-residential projects. Currently, state law allows off-site replacement units anywhere in the unincorporated areas if a project is eliminating residential uses and replacing them with non-residential uses. This action would require an off-site replacement unit to be within a 0.5 mile radius from the site of the unit that has been or will be demolished.
- Relax restrictions on the repair and restoration of damaged nonconforming residential buildings to preserve the existing housing stock. Specifically, this policy change would make it easier to restore an existing nonconforming residential building that has been damaged, for instance, in a fire, by allowing the repair and restoration ministerially if the cost to repair and restore does not exceed 100% of the building's total market value prior to the damage. The current threshold for the repair and restoration without requiring a discretionary permit is 50% of the building's total market value prior to the damage.
- Update regulations for certain housing types, as follows:
 - Remove the minimum floor area and minimum building width for single-family residences to allow for smaller homes.
 - Remove “townhouses” as a conditionally permitted use in Zones A-1, A-2, and R-R, as townhouses are not suitable or compatible with the characteristics of agricultural or recreational areas.
 - Prohibit hotels and motels in a mixed-use development in commercial and mixed-use zones. Hotels and motels as stand-alone, commercial-only uses would continue to be conditionally permitted in these zones. This change would dictate that mixed-use projects would not be allowed to mix hotel uses with residential uses.

- Clarify that “room rental,” which is currently defined as “the use of a room or rooms for the purpose of providing tenancy for compensation for periods of more than 30 consecutive calendar days,” is a permitted accessory use in various zones only in a dwelling unit that is not used as a residential care facility, a residential substance use recovery facility, supportive housing, or transitional housing. This policy-driven change would allow room rentals in dwelling units other than single-family residences (e.g., a unit in a duplex) since currently only rooms in a single-family residence may be rented to four or fewer residents.
- Streamline and improve the review process for reasonable accommodations requested by persons with disabilities by removing the noticing requirements and the option to appeal. This local policy-driven change to the County Code would change procedural details related to public notification for reasonable accommodation requests.
- Update the DBO (Chapter 22.120) with the following local policy-driven changes:
 - Amend the incentives sliding scale to add the number of incentives for projects with Acutely Low-Income housing set-aside.
 - Adjust the number of incentives that goes beyond the SDBL’s maximum.
 - Require the number of density bonus units for each tenure to be proportional to the number of affordable housing set-aside units or the number of senior housing units for each tenure in a mixed tenure project.

2.1.4 Proposed Density Bonus Ordinance Update with Potential Environmental Impacts

This section summarizes the HOU components related to changes to the DBO (Proposed DBO Update) that require quantified analysis as they contribute to the new density bonus unit projection described in Section 2.3.4, below, and have the potential to result in environmental impacts:

- **Updated Calculation Methodology.** The Proposed DBO Update would change the calculation of both affordable housing set-aside and the density bonus as follows:
 - Require inclusion of manager’s units when calculating the affordable housing set-aside and the density bonus, which could potentially allow an application to fall under a different increment on the sliding scale, with a different bonus unit count yielded.
 - Amend the density bonus sliding scale to 1) add Acutely Low-Income housing set-aside and corresponding bonuses, and 2) adjust the sliding scale increments to allow for bigger bonuses beyond the state’s maximum 50% bonus.
 - Delete the existing provision that allows an additional density bonus as an incentive for housing development with a 100 percent affordable housing set-aside.
- **Newly Eligible Lots.** The Proposed DBO Update would require inclusion of ADUs when determining the number of pre-bonus units for density bonus eligibility. Since projects with an affordable housing set-aside must have a minimum of five pre-bonus units in order to qualify for a density bonus, this proposed change could potentially make more sites eligible for a density bonus.

2.2 Project Objective

The underlying purpose of the Project is to support the development and preservation of affordable housing, promote housing diversity, and remove zoning barriers to fair housing. Specifically, the proposed HOU seeks to achieve the following objectives:

1. Codify existing state laws and executive orders related to the SDBL and other housing laws into the County Code.
2. Amend the DBO to expand local density bonuses and incentives to incentivize development of affordable housing.
3. Update the language in the existing housing ordinances to provide clarity and efficiency, maintain consistency across regulations, reduce redundant language, and update the definitions of and regulations for certain housing types.

2.3 Methodology

2.3.1 Codification of State Mandates

As summarized in Section 2.1.1, Codification of State Mandates, AB 2345, SB 290, SB 728, AB 491, SB 8, AB 682, AB 2334, AB 1287, AB 323, AB 1218, AB 1308, SB 1395, AB 1801, AB 2694, AB 98, SB 1211, AB 1529, SB 415, SB 92, AB 1154, and SB 543 are bills that amended the California Health and Safety Code, the California Government Code, or the Civil Code.

The County would codify the language of AB 2345, SB 290, SB 728, AB 682, AB 2334, AB 1287, AB 323, AB 2694, and SB 92 in the County Code to ensure consistency with the SDBL, which is a state-mandated mechanism that allows developers to obtain more favorable local development requirements in exchange for offering to build or donate land for affordable or age-qualified housing units (Government Code Sections 65915–65918). The codification of AB 323 would also ensure that the sale of income-restricted units pursuant to the IHO is in compliance with Section 714.7 of the Civil Code.

Codification of SB 8, AB 1218, AB 98, and SB 415 would ensure consistency with Article 2 (commencing with § 66300.5) of Chapter 12 and Section 65098.6 of the California Government Code, which includes affordable housing replacement requirements designed to ensure that there is no net reduction of affordable housing when existing housing units are demolished for new development.

Codification of AB 491 would ensure consistency with the amended California Health and Safety Code Section 17929, which prevents discrimination in the design and planning of mixed-income multi-family developments by requiring that residents of affordable housing units have the same access to common areas, entrances, and amenities as residents of market-rate units.

Codification of AB 1308 would ensure consistency with California Government Code Section 65863.3, which removes the obstacles homeowners face when seeking to remodel, renovate, or add on to existing single-family residences by prohibiting local jurisdictions from requiring additional parking spaces.

Codification of SB 1395 and AB 1801 would ensure consistency with the state's definition of a Low Barrier Navigation Center and the use-by-right provisions for supportive housing development.

Codification of SB 1211, AB 1154, and SB 543 would ensure consistency with state ADU Law (Chapter 13 of Division 1 of Title 7 of the Government Code).

Codification of AB 1043 would ensure consistency with Health and Safety Code Sections 50053 and 50063.5, which defines acutely low income households and the affordable rent for acutely low income households.

Codification of Executive Order N-23-25 in County Code Section 22.120.100 would suspend the use of incentives and waivers or reductions of development standards under the SDBL to modify development standards related to pedestrian character for housing development projects in the Lake Avenue Mixed Use "Center" Area in the Altadena Community Standards District, or on Fair Oaks Avenue within the perimeter of the Eaton Fire.

Lastly, codification of AB 1529 would ensure consistency with Health and Safety Code Section 50053, which revises the limit on "affordable rent" for certain rental housing development that dedicates at least 80% of units to lower income households, which includes certain one hundred percent affordable housing developments that are subject to the SDBL.

Because the codifications summarized in Section 2.1.1 are intended to implement the requirements of state law or the Governor's Executive Order, compliance is mandatory and would be required to occur regardless of whether they are codified in the County Code. The County does not have the discretionary authority to consider whether or not the laws/orders are implemented; as such, the County is complying with these laws/orders in practice in the existing condition, or will be required to comply upon the law's stated date of applicability. Therefore, the action of codifying these mandatory requirements is an administrative action and is not an action that could result in an impact on the environment. The County's codification of state law would not meet the definition of a project under CEQA Guidelines Section 15378(a), and would fit within the definition of an action that is not considered a project under CEQA Guidelines Section 15378(b)(2). Further, CEQA Guidelines Section 15268 states that ministerial projects are exempt from the requirements of CEQA. Any environmental impacts that would occur due to the state laws/orders are essentially a baseline condition, and the County must continue to operate in compliance.

2.3.2 Administrative County Code Updates

The HOU components described in Section 2.1.2, Administrative County Code Updates, are updates or revisions of the language in the existing housing ordinances for clarity, consistency, or harmonization. These updates would not result in any increased capacity for development or otherwise result in environmental impacts because they constitute clarifications to processes and definitions to increase efficiency for implementation. Some of these updates are changes to specific terminology to provide more clarity and to maintain consistency across County and state regulations. Therefore, these changes would align the County Code with existing policies to reduce inconsistencies and redundancies during implementation, and no new environmental impacts would occur.

2.3.3 County Policy-Driven Updates with No Environmental Impacts

The County policy-driven updates described in Section 2.1.3 would not result in any environmental impacts, as summarized below:

- Expand the applicability of the reduced parking ratio (0.5 spaces per bedroom) from [SB 290 \(2021\)](#) so that any project that is subject to the DBO regardless of tenure would be eligible for this reduced parking ratio if it provides at least 40% moderate-income housing set-aside and is within 0.5 miles of a major transit stop. This update would not result in environmental impacts because neither the provision of parking spaces nor the reduction of parking spaces is considered an environmental impact, as established in the case *San Franciscans Upholding the Downtown Plan, City and County of San Francisco (2002)* 102 Cal.App.4th 656, and upheld by the case *Save Our Access – San Gabriel Mountains v. Watershed Conservation Authority (2021)* 68 Cal.App.5th 8. These cases held that reduced parking is not a direct impact to the environment itself, and the inconvenience of hunting for parking is not an environmental impact, but a secondary effect. The proposed changes related to parking would allow for an expanded number of potential future projects to be developed with fewer parking spaces, and would not result in a potential environmental impact.
- Expand the applicability of Paragraph 6 of Executive Order [N-23-25](#) to include incentives and waivers or reductions of development standards provided by IHO Section 22.121.060. Projects that are subject to the IHO would not be able to modify development standards related to pedestrian character with these incentives or waivers or reductions of development standards if they are located in the Lake Avenue Mixed Use “Center” Area in the Altadena Community Standards District, or on Fair Oaks Avenue within the perimeter of the Eaton Fire. This change would not allow future development to modify County development standards related to pedestrian character in the communities specified. Thus, this policy would prevent deviations from the baseline standards within a Community Standards District or otherwise specified areas. Therefore, there would not be the potential for environmental impacts as a result of this policy-driven change.
- Expand the applicability of [SB 92](#) to include incentives provided by the IHO in Section 22.121.060. Projects that are subject to the IHO would not be able to use an incentive provided by the IHO to modify development standards that would result in a proposed project with a commercial floor area ratio that is greater than two and a half times the premises’ current allowed base zone commercial floor area ratio. This change would not allow future development to modify County development standards related to commercial floor area in mixed use developments beyond the maximum specified in SB 92. In the current IHO, there is no specified cap regarding the modification of development standards to allow for a larger commercial floor area in a mixed-use development. This policy would limit deviations from the baseline standards applicable to mixed use developments. Therefore, there would not be the potential for environmental impacts as a result of this policy-driven change.
- Harmonize various requirements across the IHO, DBO, AHPO, and ISHO’s provisions on permanent motel conversion for consistency, clarity, and ease of implementation. These policy-driven updates would provide more equity across affordable housing units developed under the IHO, DBO, AHPO, and ISHO, and would not increase the number of units developed or otherwise alter density or other land use considerations.
- Update the AHPO (Chapter 22.119) with the following local policy-driven changes:
 - Make several updates to the AHPO to provide more clarity and flexibility related to applicants exiting the rental market under the Ellis Act. Specifically, the updates would allow affordable replacement units

to be either rental or for sale, revising the existing local policy that requires affordable replacement units for households of lower income or below to be rental only.

- Require affordable housing replacement for certain rental units that will be withdrawn from the rental market – even those that are rented throughout the entitlement process – under the Ellis Act (Gov. Code § 7060, et seq.).
- Require like-for-like replacement in most cases regarding the number of bedrooms in each affordable replacement unit.
- Add locational criteria for off-site affordable replacement units provided by non-residential projects.

These changes to the AHPO would result in changes to the requirements of affordable replacement units; however, they would not affect the number of units or density or intensity of land use. Further, regarding the change that would require like-for-like replacement specific to the number of bedrooms in affordable replacement units, this would require replacement units to more closely align with the existing units that would be replaced, therefore remaining consistent with baseline conditions. As such, there would not be the potential for environmental impacts as a result of this policy-driven change.

- Relax restrictions on the repair and restoration of damaged nonconforming residential buildings to preserve the existing housing stock. Because this change would make it easier to repair and restore existing residential structures, and would not affect the number of units, or density or intensity of land uses, there would not be the potential for environmental impacts as a result of this policy-driven change. Further, the proposed restoration/rebuilding activities this change would enable are required to comply with all applicable development standards.
- Update regulations for certain housing types, as follows:
 - Remove the minimum floor area and minimum building width for single-family residences to allow for smaller homes.
 - Remove “townhouses” as a conditionally permitted use in Zones A-1, A-2, and R-R, as townhouses are not suitable or compatible with the characteristics of agricultural or recreational areas.
 - Prohibit hotels and motels in a mixed-use development in the commercial and mixed-use zones. Hotels and motels as stand-alone, commercial-only uses would continue to be conditionally permitted in these zones. This change would dictate that mixed-use projects would not be allowed to mix hotel uses with residential uses.
 - Clarify that “room rental,” which is currently defined as “the use of a room or rooms for the purpose of providing tenancy for compensation for periods of more than 30 consecutive calendar days,” is a permitted accessory use in various zones only in a dwelling unit that is not used as a residential care facility, a residential substance use recovery facility, supportive housing, or transitional housing. This policy-driven change would allow room rentals in dwelling units other than single-family residences (e.g., a unit in a duplex) since currently only rooms in a single-family residence may be rented to four or fewer residents.

The updates listed above would revise and clarify specific uses that are associated with housing types. These revisions would not result in potential environmental impacts because these revisions would not result in a change in density or intensity of land uses. Other existing regulations would continue to govern the development patterns of the housing types. For example, the Building Code would continue to regulate the floor area of a habitable room in a dwelling unit.

- Streamline and improve the review process for reasonable accommodations requested by people with disabilities by removing the noticing requirements and the option to appeal. This local policy-driven change to the County Code would change procedural details related to public notification for reasonable accommodation requests. While this proposed change would remove the public hearing process associated with an appeal, pursuant to CEQA Guidelines Section 15202, CEQA does not specifically require formal hearings at any stage of the environmental review process. Because it is a procedural change, it would not result in any potential impacts to the environment.
- Update the DBO (Chapter 22.120) with the following local policy-driven changes:
 - Amend the incentives sliding scale to add the number of incentives for projects with Acutely Low-Income housing set-aside.
 - Adjust the number of incentives that goes beyond the SDBL's maximum.
 - Require the number of density bonus units for each tenure to be proportional to the number of affordable housing set-aside units or the number of senior housing units for each tenure in a mixed tenure project.

These updates to the DBO would not result in potential environmental impacts because these updates would not change the number of density bonus units or where the density bonus units would be located. Further, both the current County Code and the SDBL provide unlimited waivers for affordable housing applicants, which allow for modification of development standards (e.g. height limits, setbacks, etc.). Therefore, the increase in the allowable incentives would not result in change to baseline conditions related to allowable modifications to development standards.

2.3.4 Proposed DBO Update with Potential Environmental Impacts

The Proposed DBO Update as described in Section 2.1.4 above constitute the only HOU components with potential to result in indirect environmental impacts under CEQA. The Proposed DBO Update changes 1) how density bonuses are calculated and 2) allow more properties to be eligible for density bonuses in the unincorporated areas. They would allow some project applicants to receive bigger density bonuses and/or higher density on newly density bonus-eligible properties, which could be located on properties that were not specifically identified in the Housing Element Update PEIR. Therefore, there is the potential for indirect environmental impacts related these DBO updates, which are analyzed in this Addendum. The following paragraphs detail the methodology used to quantitatively analyze the potential environmental impacts and demonstrate how these impacts fall within the number of units analyzed in the Housing Element Update PEIR.

Density Bonus Unit Projections

As provided below and summarized in Table 2, the updates summarized in Section 2.1.4 above projected density bonus units from the DBO updates fall within the Housing Element projected density bonus units. Table 2 provides the number of density bonus units entitled under the current DBO (row 1), the maximum number of density bonus units possible under the Proposed DBO Update (row 2) and compares it to the number of density bonus units analyzed under the Housing Element Update PEIR (row 3).

Table 2. Comparison of Density Bonus Units

Row	Density Bonus Ordinance		Density Bonus Units in a 5-Year Period	Annual Average Density Bonus Units
1	Current Density Bonus Ordinance		2,753 ¹	551 ¹
2	Proposed Density Bonus Ordinance Update	<i>Potential Density Bonus Units from Updated Calculation Methodology²</i>	2,029	406
		<i>Potential Density Bonus Units on Newly Eligible Lots³</i>	1,146	229
		<i>Total for Proposed Density Bonus Units</i>	3,175	635
3	Housing Element		5,619	702

Notes:

- ¹ Based on County of Los Angeles records of all affordable housing projects entitled under the current Density Bonus Ordinance from January 1, 2020, to December 31, 2024.
- ² The potential density bonus units from the adjusted sliding scale were calculated by applying the adjusted sliding scale to the historical density bonus data, removing the additional bonus as an incentive from any historical projects that used the incentive, and including the manager's unit in total pre-bonus unit count when calculating the affordable housing set-asides and the number of density bonus units.
- ³ The potential density bonus units on newly eligible lots were calculated by determining the number of lots with an H18 or H30 General Plan land use designation that would be eligible for a density bonus with the addition of one or two accessory dwelling units, and then calculating the projected density bonus units that could result from these newly eligible lots. Table 3 and Table 4 further describe the methodology used to calculate this number.

Table 2 Row 1: 2020–2024 Historical Data Under Current Density Bonus Ordinance

The current DBO became effective in November 2019. To determine how many potential density bonus units would result from the Proposed DBO Update, an analysis was conducted based on the historical data of all affordable housing projects that were entitled from January 1, 2020 through December 31, 2024, pursuant to the current DBO. The total number of density bonus units entitled during this period was 2,753, or an average of 551 per year (shown in Table 2, row 1). Thus, based on historical data, an average of 551 density bonus units per year can be interpreted as being representative of the typical year under the current DBO.

Table 2 Row 2: Density Bonus Unit Projections Under Proposed Density Bonus Ordinance

To determine how each of the proposed changes to the DBO would affect the potential number of density bonus units that could be developed based on 2020 through 2024 historical data, the methodology described below was used to ensure each change was captured in the calculations.

Potential Density Bonus Units from Updated Calculation Methodology

The number of potential density bonus units was calculated using the historical data as a representative of affordable housing projects with density bonus units over a 5-year period. Specifically, the following three changes were incorporated into the updated calculation methodology.

1. Projected Density Bonus Units Based on Proposed Inclusion of Manager's Unit: The Proposed DBO Update would require the inclusion of the manager's unit when calculating both the affordable housing set-aside and the density bonus. When calculating the potential density bonus units under the Proposed DBO Update, the affordable housing set-aside percentage was re-calculated using the historic affordable housing set-

aside unit counts. For example, as depicted in the case study shown in Table 3, below, under the current DBO, a project setting aside 36 of the 37 pre-bonus units for moderate income households is considered providing a 100% affordable housing set-aside since the manager's unit is subtracted. Under the Proposed DBO Update, a project setting aside the same number of pre-bonus units (36 of 37) is considered providing a 97.30% affordable housing set-aside since the manager's unit would not be subtracted. The different set-aside percentage would then place the project into a different increment on the density bonus sliding scale. The proposed inclusion of the manager's unit was applied to each of the historic affordable housing projects to calculate the projected density bonus units under the Proposed DBO Update, with the assumption that the applicant would propose the same number of affordable housing set-aside units on the same lot.

2. Projected Density Bonus Units Based on Proposed Adjusted Sliding Scale: The Proposed DBO Update would adjust the density bonus sliding scale, which determines the density bonus percentages based on the set-aside percentages and the level of affordability. For example, as depicted in the case study shown in Table 3, below, the adjusted sliding scale under the Proposed DBO Update would allow a density bonus of 91.25%.³ The proposed adjusted sliding scale was applied to each of the historic affordable housing projects to calculate the potential density bonus units under the Proposed DBO Update, with the assumption that the applicant would propose the same number of affordable housing set-aside units on the same lot.
3. Projected Density Bonus Units Based on Proposed Removal of Additional Density Bonus as an Incentive: The Proposed DBO Update would remove the existing provision that allows an unlimited additional bonus through an incentive for projects with a 100% affordable housing set-aside. This was incorporated into the new density bonus calculation by removing the additional bonus from those representative projects that had used the unlimited bonus incentive, such as the case study shown in Table 3, below. This would result in a decrease in allowable density bonus units on a single lot.

To illustrate how the three changes above affect the total density bonus unit count on a single lot, Table 3 compares the number of density bonus units approved in an example housing project⁴ under the current DBO, and the number of potential density bonus units the same project with the same number of affordable housing set-aside units would receive under the Proposed DBO Update. Under the current DBO, 58 density bonus units were approved in exchange for 36 moderate income units provided in the housing project. In contrast, the applicant would receive 34 density bonus units under the Proposed DBO Update if the same number of moderate income units were provided.

Table 3. Case Study - Comparison of Density Bonus Calculation

Variable	Current Density Bonus Ordinance	Proposed Density Bonus Ordinance
Maximum Units Allowed Per General Plan (Pre-Bonus)	37	37
Number of Proposed Manager's Unit	1	1
Number of Proposed Affordable Housing Set-Aside Units	36 at 120% AMI (Moderate Income)	36 at 120% AMI (Moderate Income)
Proposed Affordable Housing Set-Aside Percentage	36 Affordable Units / (37 Pre-Bonus Units - 1 Manager's Unit) = 100%	36 Affordable Units / 37 Pre-Bonus Units = 97.30%

³ As shown in Table 22.120.050-A of the proposed HOU, the density bonus percentage would increase from the current's 58% to 91.25% for projects providing a 95% to 99% moderate income housing set-aside.

⁴ Project Number PRJ2023-003591, which was approved on March 7, 2024, to authorize a 95-unit apartment building with an affordable housing set-aside and on-site supportive services.

Table 3. Case Study - Comparison of Density Bonus Calculation

Variable	Current Density Bonus Ordinance	Proposed Density Bonus Ordinance
Density Bonus Percentage Based on Sliding Scale	60%	91.25%
Number of Density Bonus Units Based on Sliding Scale	(37 Pre-Bonus Units – 1 Manager's Unit) x 60% = 22 units	37 Pre-Bonus Units x 91.25% = 34 units
Eligible for Additional Bonus with a 100% Affordable Set-Aside as an Incentive?	Yes	N/A
Additional Bonus Units as an Incentive	36	None
Total Number of Density Bonus Units	22 Base Density Bonus Units + 36 Additional Density Bonus Units = 58 units	34 units

Notes: AMI = area median income; N/A = not applicable

As shown in Table 2, Comparison of Density Bonus Units, the total potential number of density bonus units resulting from the updated calculation methodology was determined to be 2,029 units over a 5-year period, or an average of 406 units per year (Table 2, row 2). The number of density bonus units resulting from the three changes pertaining to the density bonus calculation methodology would be decreased when compared to the total units allowed under the current DBO. This decrease is due to the removal of the existing provision that allows an additional density bonus as an incentive for housing development with a 100% affordable housing set-aside, as demonstrated in the case study in Table 3.

Potential Density Bonus Units on Newly Eligible Lots

Under the Proposed DBO Update, ADUs would be included as a pre-bonus unit when determining the number of pre-bonus units for density bonus eligibility. Under the current DBO, ADUs are not considered when determining eligibility. Because projects with an affordable housing set-aside must have a minimum of five pre-bonus units to qualify for a density bonus, under the SDBL, this proposed change could potentially make more lots eligible for a density bonus.

To capture the additional lots that would be newly eligible for a density bonus, a Countywide analysis was conducted for lots that are large enough to yield three or four principal units based on the General Plan land use designation's maximum allowable density, and, with the addition of one or two ADUs pursuant to the ADU Ordinance, would meet the minimum of five pre-bonus units under the Proposed DBO Update. Lots included in this analysis are designated H18 (0–18 dwelling units per acre) and H30 (20–30 dwelling units per acre) by the General Plan. As shown in Table 4 column 5, a total of 21,689 lots designated H18 or H30 would be newly eligible for a density bonus.

Table 4. Projected Density Bonus Units from Newly Eligible Lots

General Plan Land Use Designation	Lot Size (Square Feet)	Maximum Number of Principal Units Allowed Per General Plan (Per Lot)	Number of ADUs Needed to be Eligible for Density Bonus (Per Lot)	Total Number of Lots Newly Eligible for Density Bonus if ADUs are Proposed	Number of Lots Likely to Propose ADUs (Over 5 Years) ¹	Density Bonus Units (Per Lot) ²	Density Bonus Units Buildout (Over 5 Years)	Average Bonus Units Per Year
H18 (0–18 du/ac)	5,000 – 7,260	3	2	13,155	526	1	526	105
H18 (0–18 du/ac)	7,261 – 9,680	4	1	5,407	216	2	433	87
H30 (20–30 du/ac)	5,000 – 5,808	4	1	3,127	94	2	188	38
Total	N/A	N/A	N/A	21,689	836	N/A	1,146	229

Notes: ADU = accessory dwelling unit; du/ac = dwelling units per acre; N/A = not applicable.

¹ A discounting factor was applied to the total number of H18 and H30 lots of specific sizes shown in column 5 to account for the likelihood of these lots adding ADUs and becoming eligible for a density bonus as a result under the proposed Density Bonus Ordinance over a 5-year period. See Table 5 for more details on how the discounting factor was determined.

² A 27.5% density bonus was applied, which is consistent with the density bonus assumption used in Housing Element's buildout methodology.

Although 21,689 lots would become newly eligible for a density bonus under the Proposed DBO Update, only a subset of the lots is likely to propose ADUs and become eligible for a density bonus as a result. To estimate the number of newly eligible lots that would likely propose ADUs, the number of ADU applications that were approved on H18 and H30 lots from 2020 to 2024 was compiled (shown in Table 5, column 3), which consisted of 1,396 within H18 lots and 481 within H30 lots, for a total of 1,877 applications.

Table 5. Discounting Factor for the Likelihood of Lots Proposing ADUs and Becoming Newly Eligible for a Density Bonus

General Plan Land Use Designation	Number of Lots Countywide	ADU Applications Approved (2020–2024)	Percent of Lots with ADU Applications Approved (Discounting Factor) ¹
H18 (0–18 du/ac)	34,850	1,396	4%
H30 (20–30 du/ac)	16,304	481	3%

Notes: ADU = accessory dwelling unit; du/ac = dwelling units per acre.

¹ The percentage is used as a discounting factor to estimate the number of lots that will likely add ADUs and become eligible for a density bonus as a result of the proposed Density Bonus Ordinance over a 5-year period, as presented in Table 4, column 6.

The 3% and 4% factors were then applied to the 21,689 lots that are newly eligible for a density bonus to estimate the number of newly eligible lots that would likely propose ADUs (represented in Table 4, column 6). It was determined that 836 lots would likely propose ADUs and become newly eligible for a density bonus.

On the 836 lots that would likely propose ADUs and become newly eligible for a density bonus, a 27.5% density bonus was applied to estimate the total number of density bonus units that would result from the proposed changes

that broaden density bonus eligibility (i.e., the inclusion of ADUs in the pre-bonus unit count).⁵ As shown in Table 4, column 7, where the General Plan H18 land use designation allows a maximum of 3 principal units on a lot, a 27.5% density bonus would yield 1 bonus unit (i.e., 3 principal units x 27.5% = 1 bonus unit [rounded up]). Where the General Plan H18 or H30 land use designation allows a maximum of 4 principal units on a lot, a 27.5% density bonus would yield 2 bonus units (i.e., 4 principal units x 27.5% = 2 bonus units [rounded up]). If the projected 836 newly eligible lots received a density bonus, the anticipated density bonus unit buildout over a 5-year period would be 1,146 units, or an average of 229 units per year (Table 4, columns 8 and 9).

The 1,146 “new” density bonus units (or 229 average per year) on the newly eligible lots were then added to the potential density bonus units that result from the updated density bonus calculation methodology (i.e., 2,029 total units, or 406 average per year), which would result in 3,175 potential density bonus units over a 5-year period, or an annual average of 635 density bonus units (Table 2, row 2).

The annual average of 635 density bonus units under the Proposed DBO Update would represent an approximate 15% increase when compared to the 551 average density bonus units under the current DBO. As such, this 15% increase has the potential to result in more residential units in the unincorporated areas, and therefore has the potential to result in environmental impacts.

Table 2 Row 3: Comparison to Housing Element Density Bonus Unit Projection

The analysis of population and housing growth in the Housing Element Update PEIR included the assumption that density bonus units would be developed, and the environmental impacts of the buildout of the Housing Element was fully analyzed accordingly. As shown in Table 2, row 3, the maximum density bonus units that were assumed for implementation of the Housing Element over the 8-year planning cycle (2021–2029) was 5,619 units, which equates to an average of 702 units per year. As such, it can be demonstrated that the Housing Element Update PEIR analyzed the impacts associated with 5,619 density bonus units over the planning cycle, or 702 units per year, which is greater than the 3,175 density bonus units, or 635 units per year, that would result from the Proposed DBO Update. Therefore, the Housing Element Update PEIR fully accounted for the density bonus unit count that is anticipated to result from the Proposed DBO Update, and there would be no additional impact associated with density bonus units beyond what was set forth in the Housing Element Update PEIR.

Additional Density Bonus Unit Locations Due to the Newly Eligible Lots

Another factor that must be considered related to the Proposed DBO Update is the geographic scope of the potential density bonus units. The following narrative describes the methodology behind the analysis of geographic location, and how the potential density bonus units still fall within what was analyzed in the Housing Element Update PEIR.

Housing Element Update Rezoning Program

To demonstrate that there are enough sites within the unincorporated areas of Los Angeles County with adequate densities to accommodate the RHNA at each income level, the Housing Element Update included a Sites Inventory where the sites must meet several criteria, including residential zoning of a certain density, a minimum lot size, and being vacant or underutilized. Because the Sites Inventory falls short of the goal to have enough land to

⁵ The assumption of a 27.5% density bonus per lot is consistent with the methodology used in the Housing Element because a 27.5% density bonus was applied to certain sites in the Sites Inventory and the Rezoning Program, and was included in the Housing Element Update PEIR’s buildout analysis.

accommodate the RHNA, the Housing Element Update includes a Rezoning Program to allow for more housing. Per Appendix G, Sites Inventory and Rezoning Methodology, of the Housing Element, to compile a list of the most appropriate sites for rezoning and redesignation, County staff performed a site selection analyses for more than 200,000 parcels within unincorporated Los Angeles County (County of Los Angeles 2022b). The sites selected for potential rezoning and redesignation were initially screened based on size, General Plan land use designation, and County Assessors data (County of Los Angeles 2022b). Criteria for excluding certain lots included avoidance of areas that were biologically sensitive and sites in various naturally constrained areas such as the Very High Fire Hazard Severity Zone. The sites were further refined using additional criteria to determine if the sites were developable and met the requirements of the state's Housing Element Law. The site selection methodology is discussed in further detail in Appendix G, Sites Inventory and Rezoning Methodology, of the Housing Element (County of Los Angeles 2022b).

The County anticipated that rezoning of these parcels would increase capacity and that housing development would occur over time on these parcels to meet the additional housing needs. The Housing Element Update PEIR, which analyzed the environmental impacts associated with implementation of the Housing Element Update, considered all of the parcels identified in the Rezoning Program. Because the Housing Element Update PEIR considered development within the Rezoning Program parcels and did not consider development on all residential properties that could potentially be subject to the DBO updates, it is likely that some of the anticipated development that would be generated under the DBO updates were not necessarily anticipated at the same locations as in the Housing Element Update PEIR.

Newly Eligible Density Bonus Lots

The newly density bonus-eligible lots are not located exclusively within the Rezoning Program areas that were evaluated in the Housing Element Update PEIR. This is because the locational criteria used to exclude lots from the Rezoning Program areas have no impact on where ADUs are permitted (and the addition of ADUs is what would make the H18 and H30 lots listed in Table 4 eligible for a density bonus), since the state ADU law allows ADUs where housing is allowed and/or exists. Similarly, the SDBL applies to any lot where a minimum of five pre-bonus units is permitted with no additional locational criteria. As such, the Proposed DBO Update – specifically, the proposed inclusion of ADUs for density bonus edibility – may result in development on lots outside the Rezoning Program areas that were evaluated in the Housing Element PEIR; therefore, this Addendum evaluates the potential environmental impacts associated with development of one or two density bonus units on these newly eligible lots in the H18 and H30 designations (Table 4, row 7).

Of the anticipated 635 density bonus units that could occur in a typical year with the Proposed DBO Update, 406 potential density bonus units that are expected to result from the proposed density bonus calculation methodology are projected on lots with density bonus units already approved under the current DBO for 2020 to 2024. These lots are already eligible for a density bonus and, therefore, these 406 density bonus units would be located in the same areas that were historically eligible for a density bonus and are included within the density bonus unit count evaluated in the Housing Element Update PEIR.

Of the anticipated 635 density bonus units that could occur in a typical year with the Proposed DBO Update, 229 potential density bonus units could occur annually on the newly eligible lots (Table 2, row 2). As previously stated, it is highly unlikely that all H18 and H30 land use designation properties proposing ADUs would also request a density bonus. Further, many would be within the Rezoning Program areas because the H18 and H30 land use designations are generally mapped in the urbanized areas of the unincorporated County outside areas that are

biologically sensitive and/or with natural constraints, and therefore were analyzed in the Housing Element Update PEIR, thereby encouraging development on lots that were already included in the Rezoning Program. Therefore, it can be anticipated that these additional density bonus units would occur on higher-density urban infill properties given where the H18 and H30 land use designations are mapped, which inherently are mapped in urbanized areas with existing infrastructure and services.

Nevertheless, it is anticipated that in any given year, a small percentage of the 229 potential density bonus units could be developed on properties that were not identified for growth in the Rezoning Program area analyzed by the Housing Element Update PEIR, and, therefore, impacts to those specific locations would not have been assessed in the Housing Element Update PEIR. As shown in Table 4, there is only the potential for one to two additional density bonus units on any given lot. *As such, this Addendum includes an analysis of the potential environmental impacts related to the development of one to two additional density bonus units in the H18 and H30 land use designations that are not included in the Rezoning Program of the Housing Element.*

2.4 Project Discretionary Actions and Approvals

The HOU would require the following discretionary actions by the County:

- Approval of this Housing Ordinances Update Addendum to the Housing Element Update PEIR
- Approval of Amendments to Title 21 and Title 22 of the County Code

3 Environmental Analysis

The Housing Element Update PEIR evaluated all the environmental issue areas included in County's Guidelines for Thresholds of Significance, consistent with Appendix G of the CEQA Guidelines. As presented in the discussion below, the proposed HOU would not result in any new significant information of substantial importance, new impacts, or an increase in the severity of previously identified impacts associated with the issues covered in the Housing Element Update PEIR (County of Los Angeles 2021).

3.1 Aesthetics

Housing Element Update PEIR Finding

The Housing Element Update PEIR determined that the Housing Element Update would allow for greater densities than currently allowed in Los Angeles County, but future development would comply with the framework of existing General Plan policies and ordinances, as well as policies proposed as part of the Housing Element Update, that serve to protect existing scenic vistas, state scenic highways, and visual character. In addition, compliance with the County's Zoning Ordinance (Title 22 of the County Code), such as County Code Section 22.46.530 (Signs); the California Building Code; and other applicable County provisions that protect daytime and nighttime views would be enforced through the County's development review and permit process. Impacts related to aesthetics were determined to be less than significant.

Proposed Housing Ordinances Update Analysis

The proposed HOU would allow for the development of one to two density bonus units on newly eligible properties in the H18 and H30 land use designations. These properties would be required to have a base density of at least five units, including ADUs, to be eligible for the density bonus of one to two units. As such, the potential aesthetic impact associated with changing from a five-unit lot to a six- or seven-unit lot could include increased height or building mass to accommodate the extra unit(s). Some properties under the DBO updates would receive an increase in density bonus allowance due to the new increments for affordable housing set-asides and associated density bonus, but the majority would have a decreased allowance due to the removal of the existing provision that allows an additional density bonus as an incentive for housing development with a 100% affordable housing set-aside.

It is anticipated that properties under the H18 and H30 land use designations or on parcels not specifically considered in the Housing Element Update PEIR would be within an urbanized area subject to existing residential and/or urban development standards, and would be compatible with the surrounding community. The addition of unit(s) on an individual lot would result in an incremental increase in building mass that would be subject to the existing County Code requirements for development standards (e.g., standards for setback, height, scale, outdoor lighting, and other standards as established by the California Building Code), as well as General Plan policies that are meant to maintain continuity in the built environment and to protect daytime and nighttime views. The addition of unit(s) on a developed property within an urban setting would have an incremental impact on the immediately surrounding land uses in a manner similar to all of the housing anticipated in the Housing Element Update PEIR, and would not have the potential to result in a significant aesthetic impact.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the

HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to aesthetics would occur as a result of the proposed HOU.

3.2 Agriculture and Forestry Resources

Housing Element Update PEIR Finding

The Housing Element Update PEIR determined that the Rezoning Program, which would provide zoned capacity to accommodate the development of housing units to meet the RHNA, would occur in urban and suburban areas, many of which are located along commercial corridors. These areas would not include Prime Farmland or Farmland of Statewide Importance, areas zoned for agricultural use, areas designated for the Williamson Act, or forest land. It was determined that the Housing Element Update would have no impact on agricultural or forestry resources.

Proposed Housing Ordinances Update Analysis

Although future development under the HOU could be on parcels outside of the Rezoning Program area, and thus were not considered specifically in the Housing Element Update PEIR analysis, this would not result in changes to impacts on agricultural resources. The Proposed DBO Update would not encourage development in areas designated as Prime Farmland or Farmland of Statewide Importance, areas zoned for agricultural use, areas designated for the Williamson Act, or forest land. All newly eligible density bonus units would occur on properties with an H18 or H30 land use designation, which are not intended for agricultural uses, or in urban areas intended for residential development. Otherwise, a zoning change or land use amendment would be required.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to agriculture or forestry resources would occur as a result of the proposed HOU.

3.3 Air Quality

Housing Element Update PEIR Finding

The Housing Element Update PEIR determined that the Housing Element Update would result in the potential to increase the frequency and/or severity of existing air quality violations, and would result in a potentially significant impact associated with Consistency Criterion 1 of the South Coast Air Quality Management District's Air Quality Management Plan, as well as with a potential conflict with Antelope Valley Air Quality Management District air quality plans, including the 2016 Federal 75 Parts per Billion Ozone Attainment Plan, and would be a potentially significant impact.

Mitigation Measure (MM) AQ-1 through MM AQ-5, and MM TRA-1 through MM TRA-7 would be applied to reduce potential construction and operational emissions (see Section 4.3, Air Quality, and Section 4.17, Transportation, of the Housing Element Update PEIR [County of Los Angeles 2021] for complete descriptions of the mitigation

measures). However, it was determined that, even with implementation of mitigation, the impact would remain significant and unavoidable.

Proposed Housing Ordinances Update Analysis

The proposed changes from the DBO updates could result in an incremental increase in density due to the additional one to two density bonus units that would be allowable on a newly eligible property. The location of the unit(s) is not relevant to the analysis of air quality, which is assessed based on impacts on the air basin. Site-specific impacts were not considered in the Housing Element Update PEIR. The Proposed DBO Update would generate density bonus units that are already within the scope of the build-out assumptions of the Housing Element Update PEIR. As previously discussed, the Housing Element Update PEIR factored in 5,619 density bonus units (702 units per year over the 8-year Housing Element cycle) within the environmental analysis. In comparison, the proposed HOU would result in a maximum of 3,175 density bonus units (635 units per year over a 5-year period). Because more density bonus units were considered under the Housing Element Update PEIR than are possible under the proposed HOU, operational impacts of the proposed HOU would not result in changes to the potential impact. Therefore, the analysis of air quality impacts conducted as part of the Housing Element Update PEIR encompasses the potential for environmental impacts resulting from the DBO updates.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to air quality would occur as a result of the proposed HOU.

3.4 Biological Resources

Housing Element Update PEIR Finding

The Housing Element Update PEIR determined that although the Rezoning Program would occur in urban and suburban areas that are heavily disturbed, some areas of the Rezoning Program are within 1 mile of sensitive plant and wildlife biological resources as defined and mapped by the California Natural Diversity Database; therefore, the impact would be potentially significant. MM BIO-1 and MM BIO-2 would be implemented to reduce impacts to special-status species to less than significant. No known federally protected wetlands were mapped in the areas of the Housing Element Update PEIR; however, the Housing Element Update PEIR noted that not all wetland features are captured within the available reference data. As such, the Housing Element Update PEIR concluded that the Housing Element Update could result in a potentially significant impact. MM BIO-1 and MM BIO-3 would be implemented, which would reduce the potential impact to less than significant. The Housing Element Update PEIR found that there would be no impacts to regional wildlife linkages, and no conflict with the County's Oak Tree Ordinance, the Oak Woodlands Conservation Management Plan, or the County Hillside Management Area Ordinance.

Proposed Housing Ordinances Update Analysis

Although future development subject to the DBO updates could be on parcels outside of the Rezoning Program area, and thus not considered specifically, this would not result in a substantial change to biological resources impacts. Future housing development projects taking advantage of the density bonus allowed under the DBO updates would be subject to General Plan policies and relevant state and regional regulations protecting biological resources.

Additionally, MM BIO-1 through MM BIO-3 would be implemented for future projects where applicable, reducing any potential impact to biological resources to less than significant. Therefore, the proposed HOU would not result in any more substantial impacts to areas identified as having sensitive plant or wildlife biological resources, wetlands, or wildlife linkages, and the HOU would not result in new or greater impacts to biological resources.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to biological resources would occur as a result of the proposed HOU.

3.5 Cultural Resources

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that areas included in the Rezoning Program (where future development associated with the Housing Element could occur) contain properties 45 years old and older that have not yet been evaluated for historical significance, and impacts to these properties could result in potentially significant impacts. Implementation of MM C-1 would ensure that these properties are evaluated in accordance with professional standards prior to activities associated with future development projects. MM C-2 would ensure alterations or modifications to historical resources would conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties, Standards for Rehabilitation. However, demolition is generally considered significant and unavoidable that cannot be mitigated to a less-than-significant level.

No archaeological resources were identified within the Rezoning Program area; however, it is possible that unanticipated discoveries could be encountered as part of development activities associated with the Housing Element Update. Implementation of MM C-3 and MM C-4 would ensure that construction personnel would undergo training for the proper identification and treatment of inadvertent discoveries, and would require the retention of an on-call qualified archaeologist to address inadvertent discoveries. With mitigation incorporated, the Housing Element Update PEIR found that the potential impact to archaeological resources would be reduced to less than significant.

The Rezoning Program area was found to include geological units with moderate to high paleontological sensitivity; therefore, impacts would be potentially significant. Implementation of MM C-5 would require the retention of a qualified paleontologist to implement a paleontological monitoring program, which would reduce the impact to less than significant. In the event that human remains are inadvertently encountered during future housing development projects, such resources would be treated in accordance with state and local regulations with regard to human remain discovery. With adherence to regulatory requirements, the Housing Element Update PEIR concluded that impacts would be less than significant.

Proposed Housing Ordinances Update Analysis

Because the Housing Element Update PEIR is a programmatic document, and the location of future housing development projects is unknown, the Housing Element Update PEIR applied mitigation measures to reduce potential impacts to cultural resources to less than significant in the case that cultural resources may be present

at future project sites. The proposed HOU may indirectly result in more dense housing development projects located on parcels that were not specifically analyzed as part of the Housing Element Update PEIR. However, future projects on these parcels would be subject to the mitigation set forth in the Housing Element Update PEIR. MM C-1 through MM C-5 would apply, which would reduce potentially significant impacts to less than significant, except for the impact associated with the demolition of a historical resource, just as in the Housing Element Update PEIR. Even with implementation of MM C-1 and MM C-2, which would ensure that these properties are evaluated in accordance with professional standards and that alterations or modifications to historical resources would conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties, Standards for Rehabilitation, demolition of a historic resource is generally considered significant and unavoidable and cannot be mitigated to less than significant. Even so, the HOU would not result in new or greater impacts to cultural resources than was found in the Housing Element Update PEIR.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to cultural resources would occur as a result of the proposed HOU.

3.6 Energy

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that any future housing development facilitated by the programs within the Housing Element Update would be required to adhere to all federal, state, and local requirements for energy efficiency, including the latest Title 24 standards, the County's Climate Action Plan, SCAG's RTP/SCS, and California Air Resources Board's Scoping Plan. This framework of regulations would increase energy efficiency of future residential development. The Housing Element Update PEIR found that impacts related to energy would be less than significant.

Proposed Housing Ordinances Update Analysis

The potential density increase associated with the DBO updates, and the associated energy demands, were included in the build-out assumptions of the Housing Element Update PEIR. As previously discussed, the Housing Element Update PEIR factored in 5,619 density bonus units (702 units per year over the 8-year Housing Element cycle) within the environmental analysis. In comparison, the proposed HOU would result in a maximum of 3,175 density bonus units (635 units per year over a 5-year period). Any future housing development facilitated by the HOU would be required to adhere to all federal, state, and local requirements for energy efficiency, including the latest Title 24 standards, the County's Climate Action Plan, SCAG's RTP/SCS, and the California Air Resources Board's Scoping Plan, which would reduce energy demand and increase energy efficiency of development facilitated by the HOU. Because more density bonus units were considered under the Housing Element Update PEIR than are possible under the proposed HOU, operational effects of the proposed HOU would not result in changes to the potential impact. Therefore, the HOU would not result in new or more severe impacts related to inefficient consumption of energy, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to energy would occur as a result of the proposed HOU.

3.7 Geology and Soils

Housing Element Update PEIR Finding

Due to its location within predominantly built-up urban areas and outside of a known Active Fault Trace, Alquist–Priolo Earthquake Fault Zone, or known landslide area, the Housing Element Update PEIR found that the Housing Element Update would have a less-than-significant impact related to being located within an Alquist–Priolo Earthquake Fault Zone, and resulting in or being subject to strong seismic ground shaking, ground failure, liquefaction, lateral spreading, or landslides. Additionally, the Housing Element Update PEIR found that the Housing Element Update and associated Rezoning Program would not be within areas of unstable or expansive soils, nor result in substantial erosion or loss of topsoil because the Housing Element Update would not be within areas of greater susceptibility to soil erosion. Existing building and grading codes would serve to minimize hazards related to unstable and expansive soils, as would the required site-specific grading plans and reports reviewed by the County Plan Check Review process prior to future project approval. The Housing Element Update PEIR concluded that impacts related to unstable soil and soil erosion would be less than significant. The Housing Element Update PEIR found that the majority of future development under the Housing Element Update would be connected to existing wastewater systems and would not require on-site wastewater treatment systems, and thus would have a less-than-significant impact related to soils that could adequately support wastewater treatment systems.

Proposed Housing Ordinances Update Analysis

Although future development subject to the DBO updates could be on parcels outside of the Rezoning Program area, and thus not considered specifically in the Housing Element Update PEIR, the HOU would not result in any substantial change to geologic resources or soils, and would not exacerbate hazards associated with geology or soils. In the case that future projects are within an Active Fault Trace, Alquist–Priolo Earthquake Fault Zones, known landslide area, Hillside Management Area, or area with unstable or expansive soils, these projects would comply with the existing regulatory processes in place, including compliance with the California Building Code and preparation of site-specific geotechnical studies related to site stability and potential hazards, which serve to reduce or avoid soil erosion and hazards related to unstable and expansive soils. Therefore, the HOU would not result in new or more severe impacts associated with geologic, soil, or seismic conditions.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to geology or soils would occur as a result of the proposed HOU.

3.8 Greenhouse Gas Emissions

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that annual operational greenhouse gas (GHG) emissions with amortized construction emissions would not exceed the South Coast Air Quality Management District's threshold of 3,000 metric tons of carbon dioxide equivalent (CO₂e) per year or the Antelope Valley Air Quality Management District's threshold of 100,000 tons of CO₂e per year. Given this analysis, and the existing discretionary permits and future CEQA project-specific review process that would occur, the Housing Element Update PEIR determined that the Housing Element Update would not directly or indirectly generate GHG emissions that would have a significant impact on the environment. The future residential development facilitated by implementation of the Housing Element Update would be consistent with the applicable plans and regulations adopted for the purpose of reducing the emissions of GHGs. In addition, MM AQ-1 through MM AQ-5 and MM TRA-1 through MM TRA-7 would be applied to reduce potential construction and operational emissions (see Section 4.8 and Section 4.17 of the Housing Element Update PEIR [County of Los Angeles 2021] for complete descriptions of the mitigation measures). The Housing Element Update PEIR determined that impacts related to GHG emissions and conflict with applicable plans would be less than significant.

Proposed Housing Ordinances Update Analysis

The proposed changes from the DBO updates could result in an incremental increase in density due to the additional one to two density bonus units that would be allowable on a newly eligible property. The location of the unit(s) is not relevant to the analysis of GHG emissions, which is a global concern. Site-specific impacts are not considered in the Housing Element Update PEIR. The DBO updates would generate density bonus units that are already within the scope of the build-out assumptions of the Housing Element Update PEIR. As previously discussed, the Housing Element Update PEIR factored in 5,619 density bonus units (702 units per year over the 8-year Housing Element cycle) within the environmental analysis. In comparison, the proposed HOU would result in a maximum of 3,175 density bonus units (635 units per year over a 5-year period). Because more density bonus units were considered under the Housing Element Update PEIR than are possible under the proposed HOU, operational impacts of the proposed HOU would not result in changes to the potential impact. Therefore, the analysis of GHG impacts conducted as part of the Housing Element Update PEIR encompasses the potential for environmental impacts resulting from the DBO updates.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts related to GHGs would occur as a result of the proposed HOU.

3.9 Hazards and Hazardous Materials

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that demolition and construction activities associated with future housing development facilitated by the Rezoning Program could require the transport of hazardous materials. Numerous

federal, state, and local regulations regulate the safe use and transport of hazardous materials, including the Resource Conservation and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); the Hazardous Materials Transportation Act; the International Fire Code; Title 22, Title 27, and Title 32 of the County Consolidated Fire Code; Government Code Section 65850.2; and Health and Safety Code, Division 20, Chapter 6.95, Article 2, Sections 25500 through 25520. These would reduce the potential release of hazardous materials related to future development projects. Thus, the Housing Element Update PEIR determined that these impacts would be less than significant.

The Housing Element Update PEIR found that the Rezoning Program excluded any sites within the 65 A-weighted decibel (dBA) or above Community Noise Equivalent Level contours within Airport Influence Areas. Although portions of the Rezoning Program area would overlap with the Los Angeles International Airport Influence Area and the Rezoning Program would allow development within 2 miles of a public airport, private airstrip, or heliport, the existing framework of federal, state, and County regulations and policies would prevent hazards to the public and environment near public airports. Additionally, the proposed Housing Element policies and programs would not significantly increase the safety hazard for people residing or working within the Housing Element Update area. The Housing Element Update PEIR found that this impact would be less than significant.

The Housing Element Update PEIR found that the County would coordinate rezoning with the Los Angeles County Fire Department, Los Angeles County Sheriff's Department, and various County departments to ensure adequate emergency response and service needs. Additionally, the existing regulatory framework and the location of the Rezoning Program in urbanized areas would ensure less-than-significant impacts associated with emergency response.

The Housing Element Update PEIR found that none of the Rezoning Program areas are within a fire hazard severity zone (refer to Figure 4.20-1 of the Housing Element Update PEIR). The Rezoning Program area would be within urban and suburban areas, many of which would be along commercial corridors, and would encourage in-fill development in areas with existing infrastructure. The Rezoning Program area would not be in wildland areas. Additionally, the Housing Element Update PEIR found that compliance with applicable regulations, goals, and policies would minimize impacts related to wildland fires. The Housing Element Update PEIR concluded that impacts associated with risk involving wildland fires would be less than significant.

Proposed Housing Ordinances Update Analysis

Although the Housing Element Update PEIR did not consider the potential for future development on every parcel in the unincorporated County, it considered the Countywide increase of density resulting from the Housing Element Update, including from use of the DBO. As such, the potential for hazards and hazardous materials impacts resulting from development of density bonus units was analyzed in the Housing Element Update PEIR at the programmatic level. Future development projects would be required to comply with the numerous federal, state, and local regulations for the safe use and transport of hazardous materials, including the Resource Conservation and Recovery Act (RCRA); the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); the Hazardous Materials Transportation Act; the International Fire Code; Title 22, Title 27, and Title 32 of the County Consolidated Fire Code; Government Code Section 65850.2; and Health and Safety Code, Division 20, Chapter 6.95, Article 2, Sections 25500 through 25520. Additionally, future development projects would comply with the Operational Area Emergency Response Plan, and would coordinate with the Los Angeles County Fire Department, the Los Angeles County Sheriff's Department, and the County Department of Public Works as applicable during

project review and approval to ensure consistency with emergency response plans and regulations related to wildfire and fire protection.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to hazards or hazardous materials would occur as a result of the proposed HOU.

3.10 Hydrology and Water Quality

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that construction of future housing projects would adhere to local, state, and federal regulations that protect water quality, including the California Green Building Standards Code and the Construction General Permit, which requires projects of more than 1 acre to prepare and implement a Stormwater Pollution Prevention Plan that includes best management practices to protect water quality. Operation of the Housing Element would comply with National Pollutant Discharge Elimination System and Municipal Separate Storm Sewer System Permits, and Stormwater Pollution Prevention Plan low-impact-development features would reduce impacts from runoff. The Housing Element Update PEIR found that the Housing Element Update's proposed policies and programs would not change these regulations or otherwise increase pollutant runoff. The Housing Element Update PEIR concluded that impacts related to water quality and drainage patterns would be less than significant.

The Housing Element Update PEIR found that the Rezoning Program area is not within any 100-year flood zones as determined by the Federal Emergency Management Agency, nor tsunami inundation areas. Furthermore, compliance with County regulations would require risk assessments of flooding from failure of aboveground water storage tanks for any future developments located downgrade, and thus would have a less-than-significant impact. The Housing Element Update PEIR found that there would be no impact related to placing housing within a 100-year flood hazard area, tsunami, or seiche zone.

In regard to groundwater use and recharge, the California Building Code requires development projects to submit an engineering geology report, which would include information about existing groundwater supplies and potential impacts to groundwater supplies. In addition, the increase in housing and population that would occur as a result of the Rezoning Program would align with SCAG's population and housing forecasts (upon which the RHNA is based). These forecasts do not anticipate a significant demand on groundwater supplies. Regarding groundwater recharge, the Housing Element Update PEIR found that the majority of the Rezoning Program area is developed and that the Housing Element would result in minor increases in impervious surfaces that could impact groundwater recharge. The Housing Element Update PEIR found that impacts to groundwater supplies and groundwater recharge would be less than significant.

Proposed Housing Ordinances Update Analysis

The Housing Element Update PEIR considered the overall effect of the Housing Element, including the effects of developing density bonus units. Although future development subject to the DBO updates could be on parcels outside of the Housing Element Rezoning Program area, and thus not considered specifically, future development

projects would still be required to comply with federal, state, and local regulations that protect water quality, including the California Green Building Standards Code, a project-specific County-issued grading or building permit with requirements that include best management practices to protect water quality, National Pollutant Discharge Elimination System requirements, Municipal Separate Storm Sewer System Permits, and County regulations for flood zones. Therefore, the HOU would not result in new or more severe impacts related to hydrology or water quality.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to hydrology and water quality would occur as a result of the proposed HOU.

3.11 Land Use and Planning

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that because the Rezoning Program would focus on encouraging infill development in urban and suburban areas, implementation of the Housing Element Update would not introduce substantially different land uses to the neighborhoods or include streets that would divide existing neighborhoods. Additionally, the Housing Element Update was developed to be consistent with the population forecasts of SCAG and to fill the projected gap between projected population and housing in Los Angeles County. Thus, it is consistent with the goals of SCAG's 2020–2045 RTP/SCS. Lastly, the Housing Element Update PEIR found that the Rezoning Program area does not overlap with Significant Ecological Areas and is not within any Habitat Conservation Plan area. Parcels within Hillside Management Areas were scoped out of the Rezoning Program, and therefore no future development facilitated by the Housing Element Update would occur in these areas. The Housing Element Update PEIR found that potential impacts related to physically dividing an established community and to compatibility between the Housing Element and applicable plans to be less than significant.

Proposed Housing Ordinances Update Analysis

The proposed HOU would not result in overall growth beyond what was considered in the Housing Element Update PEIR because the PEIR analysis took into account the potential use of the DBO, including development of 5,619 density bonus units across the unincorporated County, which is greater than the proposed HOU's assumed maximum potential of 3,175 density bonus units. Although the proposed HOU could result in indirect impacts from future projects on parcels not specifically considered in the Housing Element Update PEIR (outside of Rezoning Program areas), the addition of unit(s) in the H18 and H30 land use designations or on urban parcels intended for residential development would be required to comply with all applicable County Code regulations related to development standards and all applicable General Plan policies related to land use compatibility. Furthermore, development in the Hillside Management Areas or within Significant Ecological Areas would be subject to specific requirements and project-level CEQA analysis. Therefore, the proposed HOU would not result in substantive changes compared to the analysis in the Housing Element Update PEIR, and the HOU would not result in new or more severe impacts related to land use and planning. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant

impacts or a substantial increase in severity of impacts to land use and planning would occur as a result of the proposed HOU.

3.12 Mineral Resources

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that although portions of the areas within the Rezoning Program would be within Mineral Resource Zone 2 areas (where adequate information indicates that significant mineral deposits are present or there is a likelihood of their presence and development should be controlled), these areas are characterized as developed and urban. Thus, the change in land use on urbanized parcels would not result in the loss of availability of a known mineral resource. Additionally, no mineral resources sectors are located in unincorporated areas. The Housing Element Update PEIR found that oil and gas fields are located beneath substantial portions of the Los Angeles Basin, which spans parts of the Gateway, Metro, South Bay, and Westside Planning Areas. Additional oil and gas fields are located in the Chino Hills and Puente Hills, which traverse the East San Gabriel Valley, Gateway, and West San Gabriel Valley Planning Areas. However, the Housing Element Update would not dramatically reduce the availability of oil reserves throughout Los Angeles County because development of residential, commercial, and other urban uses does not preclude the continued use of nearby oil wells. The Housing Element Update PEIR concluded that impacts associated with mineral resources would be less than significant.

Proposed Housing Ordinances Update Analysis

Although future development could be on parcels outside of the Rezoning Program area and thus were not considered specifically in the Housing Element Update PEIR analysis, this would not result in changes to impacts on mineral resources. The Proposed DBO Update would not encourage development in areas subject to mineral recovery. All newly eligible density bonus units would occur on properties with H18 or H30 land use designations or in urban areas intended for residential development. Otherwise, a zoning change or land use amendment would be required. Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to mineral resources would occur as a result of the proposed HOU.

3.13 Noise

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that the Housing Element Update would result in changes to the 65 dBA Community Noise Equivalent Level traffic-attributed noise contour distances, which would result in outdoor noise levels beyond “normally acceptable” in certain areas with respect to created residential land uses. The Housing Element Update would implement policies from the General Plan to reduce potential noise land use compatibility impacts. The Housing Element Update PEIR found traffic noise to be potentially significant. The Housing Element Update PEIR found non-traffic (stationary-source) noise impacts could expose receptors to excessive stationary source noise, requiring site-specific development projects to include design features or noise mitigation measures

compatible with General Plan Noise Element Policies to meet the noise standards. The Housing Element Update PEIR found non-traffic noise to be potentially significant. MM N-1 would reduce exterior noise compatibility impacts, but noise levels may still be exceeded. The Housing Element Update PEIR concluded that impacts would remain significant and unavoidable.

The Housing Element Update PEIR found that, during construction, substantial distances would be necessary to not exceed County thresholds for groundborne vibration. Thus, the Housing Element Update PEIR concluded that impacts from construction vibration would be potentially significant. MM N-2 would be implemented to reduce construction-related vibration impacts, and MM N-3 would be implemented to reduce train-related vibration impacts. However, future development may still result in exceedance of applicable thresholds for vibration. The Housing Element Update PEIR concluded that impacts related to groundborne vibration would remain significant and unavoidable.

All future development in the Rezoning Program area would be required to be consistent with any applicable airport land use compatibility plan constraints pertaining to residential uses. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that development would not conflict with airport land use plans. The Housing Element Update PEIR determined that impacts related to excessive noise levels related to conflict with an airport land use plan or within 3 miles of a public airport would be less than significant.

Proposed Housing Ordinances Update Analysis

Because the Housing Element Update PEIR is a programmatic document, and the location of future housing development projects is unknown, the Housing Element Update PEIR applied mitigation measures to reduce potential noise impacts to adjacent sensitive receptors. Because the proposed HOU could indirectly facilitate the inclusion of additional density bonus units within a future housing development project, it could result in new traffic or non-traffic noise sources. However, the inclusion of one or two units on a lot that is developed with a minimum of five units within an urban area would result in a negligible incremental increase in noise in the immediately surrounding areas. The Housing Element Update PEIR considered the overall effect of the Housing Element, including the effects of developing density bonus units. Although future development subject to the requirements of the DBO updates could be on parcels outside of the Housing Element area, and thus not considered specifically, future development projects would still be required to comply with County Noise Ordinance regulations and with MM N-1 through MM N-3, as applicable. Any traffic noise generated by one or two more vehicles in areas that were not specifically anticipated to have an increase in traffic on local streets would be negligible.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in the severity of impacts to noise would occur as a result of the proposed HOU.

3.14 Population and Housing

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that the Housing Element Update would not require the extension of roads or infrastructure that would accommodate a population beyond the growth anticipated for the Housing Element. The estimated population upon build-out of the Housing Element Update would be consistent with SCAG's regional growth projections and would facilitate the County's goal of meeting all housing needs for projected population growth. Additionally, the Housing Element Update PEIR found that the Rezoning Program would not displace a substantial number of existing people or housing; rather, it would facilitate an increase in housing supply. The Housing Element Update PEIR concluded that the Housing Element Update would result in a less-than-significant impact related to population and housing.

Proposed Housing Ordinances Update Analysis

The Housing Element Update PEIR considered the programmatic effect of implementation of the Housing Element Update, including the effects of adding 5,619 density bonus units throughout the 8-year cycle (or 702 units yearly). This is greater than the amount of density bonus units assumed to occur under the proposed HOU. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to population and housing would occur as a result of the proposed HOU.

3.15 Public Services

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that the increased densities as a result of the Housing Element Rezoning Program would increase demand on fire protection, emergency services, school services, and library services. The Housing Element Update PEIR identified a variety of existing and proposed regulatory processes that would serve to minimize impacts associated with fire protection facilities, schools, and libraries, including existing building and fire codes, the Developer Fee Program, other financial mechanisms to support expanded school services, and the library mitigation fee program. The Housing Element Update PEIR concluded that impacts related to public services would be less than significant.

Proposed Housing Ordinances Update Analysis

The DBO updates would not induce population growth beyond what was assumed for the build-out of the Housing Element because the Housing Element Update PEIR analyzed the maximum build-out of the Rezoning Program, including the use of the DBO, for a maximum of 5,619 density bonus units (702 units per year over the 8-year Housing Element cycle). With the proposed HOU, the assumed maximum density bonus units per year would be 635 units, which is less than what was evaluated in the Housing Element Update PEIR. Additionally, future housing development projects would be subject to local policies and regulations pertaining to public services and would pay the applicable development impact fees, which would support the expansion of public services as necessary. Because more density bonus units were considered under the Housing Element Update PEIR than are possible under the proposed HOU, operational effects of the proposed HOU would not result in changes to the potential impact.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to public services would occur as a result of the proposed HOU.

3.16 Recreation

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that the anticipated increase in population in the South Bay Planning Area, Metro Planning Area, and East San Gabriel Valley Planning Area would result in an increase in demand for recreational facilities in these areas because they are identified as High or Very High for park needs. Additionally, increases in population in areas that currently do not have adequate recreational facilities would have the potential to accelerate deterioration of existing facilities from intensified overuse. Pursuant to the Quimby Act and to the County Code, new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable the County to maintain a ratio of 3 acres of local parkland for every 1,000 residents, as required by the County's Subdivision Code. These measures, as well as other County Codes and policies that ensure provision and maintenance of park facilities, would reduce the potential for deterioration of existing facilities. In addition, development and operation of new recreational facilities pursuant to implementation of the Housing Element Update may have an adverse physical effect on the environment. However, goals, policies, and actions in the General Plan, including the creation of a County Parks and Recreation Master Plan, a trails program, and Parks Sustainability Program, would guide development to reduce potential physical impacts on the environment. The Housing Element Update PEIR found that impacts related to recreational facilities would be less than significant.

Proposed Housing Ordinances Update Analysis

The DBO updates would not induce population growth beyond what was assumed for build-out of the Housing Element because the Housing Element Update PEIR analyzed the maximum build-out of the Rezoning Program, including the use of the DBO, for a maximum of 5,619 density bonus units (702 units per year over the 8-year Housing Element cycle). With the proposed HOU, the assumed maximum density bonus units per year would be 635 units, which is less than what was evaluated in the Housing Element Update PEIR. Therefore, the Proposed DBO Update would not result in new or more severe impacts to recreational facilities or regional trails due to higher demand or more use. Additionally, pursuant to the Quimby Act and the County Code, future residential subdivisions would dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable the County to maintain a ratio of 3 acres of local parkland for every 1,000 residents, as established by the County's Subdivision Code. Therefore, the HOU would not result in new or more severe impacts related to recreational facilities.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to recreation would occur as a result of the proposed HOU.

3.17 Transportation

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that the Housing Element Update would not conflict with the General Plan, including the Mobility Element, the Bicycle Master Plan, Step by Step Los Angeles County, the 2020–2045 RTP/SCS, or the Los Angeles County Metropolitan Transportation Authority programs and policies.

The Housing Element Update PEIR found that future development projects facilitated by the Housing Element Update may be screened out of preparing a vehicle miles traveled (VMT) detailed analysis. The Housing Element Update PEIR determined that a large number of parcels within the unincorporated County would potentially meet at least one of the screening criteria.⁶ Projects that are screened out are assumed to have less-than-significant impacts related to VMT. For those that are not screened out, each future development project would undergo transportation analysis that evaluates VMT as part of the project-specific environmental analysis. Even though overall program-level trip generation was determined to be negative due to reduction in commercial use, the VMT generated by proposed residential and mixed-use projects would be potentially significant. MM TRA-1 through MM TRA-7 would be implemented to reduce VMT at a project level. The Housing Element Update PEIR concluded that because the mitigation measures could not guarantee that VMT impacts would be reduced to a less-than-significant level, the impact would remain significant and unavoidable. Compliance with all provisions would be ensured through the project review process by the County and emergency service agencies (including the Fire Department, Sheriff's Department, and Department of Public Works). The Housing Element Update PEIR found that compliance with the applicable regulations and standards would result in a less-than-significant impact related to the potential to substantially increase hazards to a geometric design feature or incompatible use.

Proposed Housing Ordinances Update Analysis

The proposed changes from the DBO updates could result in an incremental increase in density due to the additional one to two density bonus units that would be allowable on a newly eligible property. The location of the unit(s) would not be relevant for regional VMT considerations, but could be relevant to the local transportation analysis zone for the community, which is a tool to help assess community-level VMT impacts. The increase of one to two unit(s) on a newly eligible property would result in a negligible change to VMT and would not be substantial enough to impact the conclusions of the VMT analysis presented in the Housing Element Update PEIR. It is anticipated that a large number of parcels within the unincorporated County would potentially meet at least one of the County's screening criteria. The development of residential uses and the use of the DBO for residential projects

⁶ Per Los Angeles County Public Works Transportation Impact Analysis Guidelines (County of Los Angeles 2020), and as referenced in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018), the following screening criteria apply to residential and mixed-use parcels:

- Does the development project generate a net increase of 110 or more daily vehicle trips?
- Is the project located within a one-half-mile radius of a major transit stop or an existing stop along a high-quality transit corridor? If the answer to the question above is yes, then the following subsequent questions should be considered:
 - a. Does the project have a floor area ratio less than 0.75?
 - b. Does the project provide more parking than required by the County Code?
 - c. Is the project inconsistent with the SCAG RTP/SCS?
 - d. Does the project replace residential units set aside for lower-income households with a smaller number of market-rate residential units?

If the answer to all four questions is no, further analysis is not required, and a less-than-significant determination can be made.

- Are 100% of the units, excluding manager's units, set aside for lower-income households?
- Does the project contain retail uses that exceed 50,000 square feet of gross floor area?

was considered under the total buildout of the Housing Element Update PEIR, and the potential impact was considered significant and unavoidable. Therefore, the Proposed DBO Update would not result in changes to the potential impact, and MM TRA-1 through MM TRA-7 would be required to reduce VMT at a project level.

Future housing development projects would comply with design and safety regulations and standards, and the project review process with the County and emergency service agencies to ensure conformity. As such, any additional units within a development project from the DBO would not conflict with applicable planning documents, increase hazards due to geometric design features, or result in inadequate emergency access.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to transportation would occur as a result of the proposed HOU.

3.18 Tribal Cultural Resources

Housing Element Update PEIR Finding

For the Housing Element Update PEIR, a sample study within the Rezoning Program area was evaluated, and there were no resources that have been determined by the lead agency to be significant pursuant to the criteria set forth in PRC Section 5024.1. Further, no specific tribal cultural resources were identified within the generally proposed Rezoning Program areas by California Native American tribes, or by the County as part of the AB 52 and SB 18 notification and consultation process. The Housing Element Update PEIR determined that the Housing Element Update would result in less-than-significant impacts related to tribal cultural resources.

Proposed Housing Ordinances Update Analysis

Because the Housing Element Update PEIR is a programmatic document and the location of future housing development projects is unknown, the Housing Element Update PEIR applied mitigation measures to reduce potential impacts to cultural resources, including tribal cultural resources, to less than significant in the case that tribal cultural resources may be present at future project sites. The proposed HOU may indirectly result in more dense housing development projects located on parcels that were not specifically analyzed as part of the Housing Element Update PEIR. However, future projects on these parcels would be subject to the mitigation set forth in the Housing Element Update PEIR. MM C-3 through MM C-5 would apply, which would reduce potential significant impacts to less than significant.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements and associated AB 52 consultation requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to tribal cultural resources would occur as a result of the proposed HOU.

3.19 Utilities and Service Systems

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that each planning area is subject to Los Angeles Regional Water Quality Control Board orders that establish performance criteria and objectives. Each planning area would be served by an existing local water reclamation plant. At the time of future development projects, the applicable water reclamation plant would be evaluated to ensure that the appropriate treatment capacity to meet wastewater treatment demand is met. As such, wastewater generation in the Rezoning Program area would be discharged to treatment systems permitted by the Regional Water Quality Control Board. The Housing Element Update PEIR concluded that impacts associated with exceeding wastewater treatment requirements would be less than significant. The Housing Element Update PEIR did not address stormwater, electric power, natural gas, or telecommunications under this threshold.

The Housing Element Update PEIR found that the Housing Element would be consistent with planned population growth for unincorporated Los Angeles County, and parcels within the Rezoning Program area would have access to existing infrastructure, including public water and sewer. Additionally, the Housing Element Update would comply with the federal, state, and local regulatory framework that reduces potential impacts to existing water and wastewater treatment facilities. The Housing Element Update PEIR found that the Housing Element Update would have less-than-significant impacts related to the potential to require the construction of new or expanded water or wastewater treatment facilities.

Proposed Housing Ordinances Update Analysis

The potential density increase associated with the DBO updates, and the associated utility demands, were included in the build-out assumptions of the Housing Element Update PEIR. As previously discussed, the Housing Element Update PEIR factored in 5,619 density bonus units (702 units per year over the 8-year Housing Element cycle) within the environmental analysis. In comparison, the proposed HOU would result in a maximum of 3,175 density bonus units (635 units per year over a 5-year period). Therefore, the analysis of utility impacts, including water supply and solid waste, conducted as part of the Housing Element Update PEIR considered the effect of all dwelling units from DBO updates. Additionally, any future housing development facilitated by the HOU would be required to adhere to all local requirements for utility infrastructure. Because more density bonus units were considered under the Housing Element Update PEIR than are possible under the proposed HOU, operational effects of the proposed HOU would not result in changes to the potential impact.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to utilities or service systems would occur as a result of the proposed HOU.

3.20 Wildfire

Housing Element Update PEIR Finding

The Housing Element Update PEIR found that the Rezoning Program area is not in any Fire Hazard Severity Zones. The emergency response plan for the Housing Element Update is the Operational Area Emergency Response Plan, which is prepared by the Office of Emergency Management. Future development projects would be required to coordinate among various County departments to ensure adequate emergency response, and would comply with policies of the General Plan Safety Element and the Vegetation Management Program created by the County Fire Department. The Housing Element Update PEIR found that the Housing Element Update would result in less-than-significant impacts related to wildfire risk.

Proposed Housing Ordinances Update Analysis

The Proposed DBO Update may indirectly result in additional density bonus units in areas that were not specifically analyzed in the Housing Element Update PEIR, including in areas located in Fire Hazard Severity Zones or that would otherwise exacerbate wildfire risk. The addition of one or two density bonus units on the newly eligible H18 and H30 land use designation lots would be an incremental increase in building mass that would be subject to the existing County Code requirements for development standards (e.g., standards for setback, height, scale, outdoor lighting, and other standards as established by the California Building Code) and General Plan policies that are meant to be protective of existing communities. The addition of unit(s) on a developed residential property within an H18 or H30 land use designation or other property intended for residential development in an urban setting would not have the potential to result in a significant increase in wildfire hazards. Future development projects would comply with the Operational Area Emergency Response Plan, and would coordinate with the Los Angeles County Fire Department, the Los Angeles County Sheriff's Department, and the County Department of Public Works, as applicable, during project review and approval to ensure consistency with emergency response plans and regulations related to wildfire and fire protection.

Further, any future development proposals would be required to undergo project-specific developmental review to ensure compliance with applicable County standards, and any discretionary project seeking approval under the HOU would be subject to CEQA requirements. There would be no substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in severity of impacts to wildfire would occur as a result of the proposed HOU.

3.21 Mandatory Findings of Significance

3.21.1 Housing Element Update PEIR Finding

The Housing Element Update PEIR determined that the Housing Element Update would result in no impacts or less-than-significant impacts to aesthetics, agricultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use, mineral resources, population and housing, recreation, public services, tribal cultural resources, utilities, and wildfire. The Housing Element Update PEIR determined that the Housing Element Update would result in less-than-significant impacts with mitigation incorporated to biological resources and paleontological resources. The Housing Element Update PEIR determined

that the Housing Element Update would result in significant and unavoidable impacts to air quality, cultural resources, noise, and transportation.

3.21.2 Proposed Housing Ordinances Update Analysis

As shown in the discussion provided above, the potential impacts of the proposed HOU would fall within the range of environmental impacts analyzed in the Housing Element Update PEIR; as such, no new or different impacts would occur beyond those previously identified in the Housing Element Update PEIR. The HOU could facilitate the development of additional density bonus units in locations not specifically assessed in the Housing Element Update PEIR, which could result in site-specific environmental impacts related to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, tribal cultural resources, transportation, and wildfire. However, as outlined within this document, the HOU would not result in substantial changes to circumstances or new information that would alter the impact conclusions of the Housing Element Update PEIR, and no new significant impacts or a substantial increase in the severity of impacts would occur as a result of the proposed HOU.

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4 References and Preparers

4.1 References

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4.2 List of Preparers

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