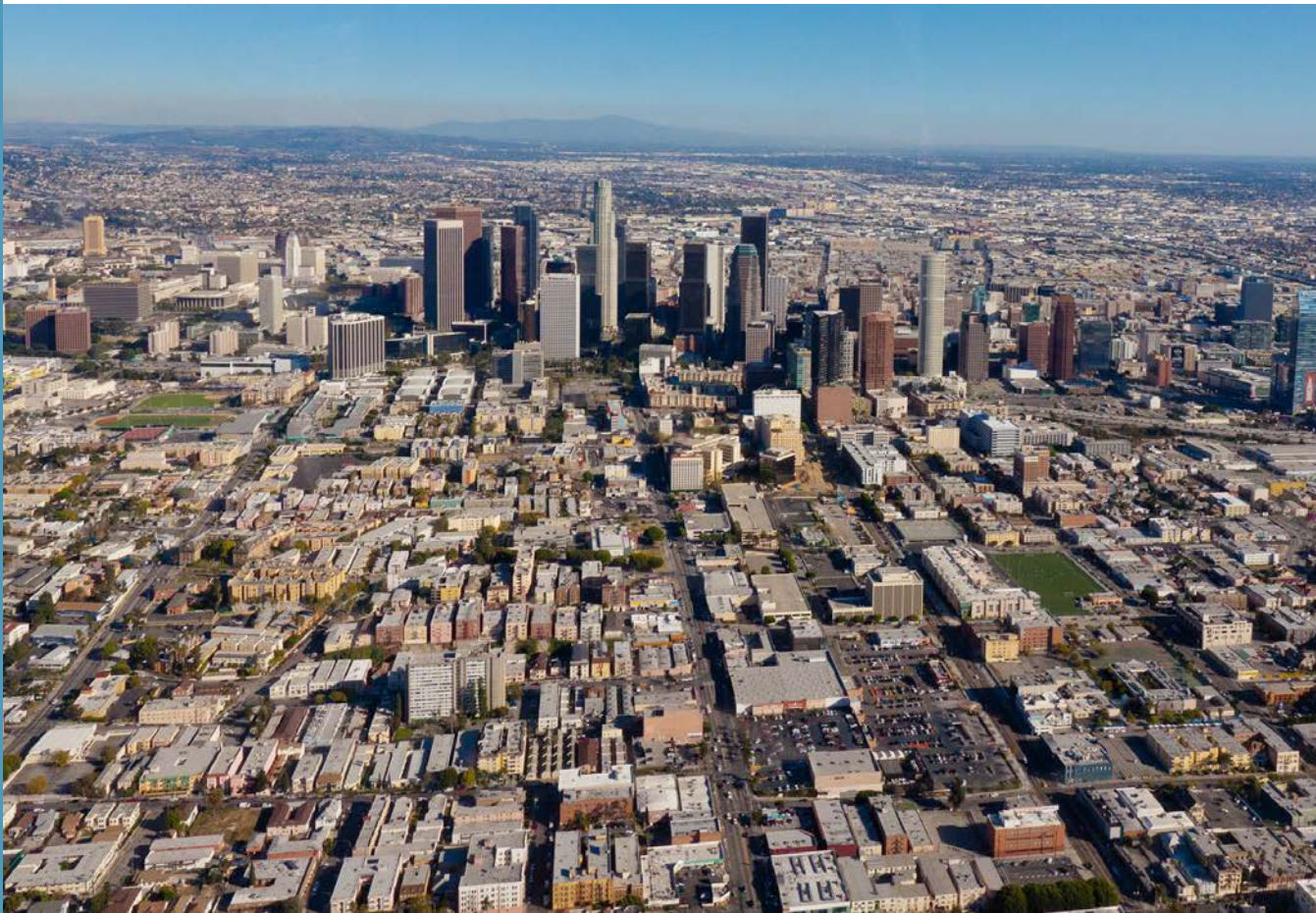


County of Los Angeles

By-Right Housing Ordinance Addendum to the General Plan Update EIR



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June 2020

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By-Right Housing Ordinance Addendum
to the General Plan Update EIR

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1.0 INTRODUCTION

1.1 OVERVIEW

This Addendum, to the previously certified Los Angeles County General Plan Update Final Environmental Impact Report (State Clearinghouse # 2011081042; hereinafter "General Plan Update EIR"), is prepared in compliance with the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.; hereinafter "CEQA") and the Guidelines for the Implementation of CEQA (Cal. Code Regs., tit. 14, § 15000, et seq.; hereinafter "Guidelines"). The currently proposed By-Right Housing Ordinance (BRHO) would work to implement the General Plan Update vision by facilitating and streamlining permitting of multi-family housing. "By-right" is a planning term used to indicate development that is allowed administratively by existing regulations and does not require discretionary review or approval.

The purpose of this Addendum is to assess the potential for the BRHO to result in additional and/or more severe adverse environmental impacts than were identified in the General Plan Update EIR.

Based on substantial evidence provided in this Addendum, the General Plan Update EIR and other materials in the record, the County of Los Angeles (County) determines that the impacts of the BRHO fall within those evaluated in the General Plan Update EIR. The BRHO would not result in any new significant environmental impacts and would not result in a substantial increase in the severity of previously identified significant effects. Further, no mitigation measures or alternatives previously found infeasible have now been found feasible and this Addendum has not identified new mitigation measures or alternatives considerably different from those in the General Plan Update EIR. Thus, neither a subsequent nor supplemental environmental impact report (EIR) is required. (Pub. Resources Code, § 21166; Guidelines §§ 15162, 15163.) This Addendum explains how impacts of the BRHO would be within the range of impacts identified in the General Plan Update EIR. Therefore, an Addendum is the appropriate CEQA document for the BRHO. (Pub. Resources Code, §21166; Guidelines, §§ 15162 – 15164.)

The BRHO involves amendments to Title 21 – Subdivisions and Title 22 – Planning and Zoning of the Los Angeles County Code. **Chapter 2.0** of this Addendum describes the BRHO in detail.

This Addendum is organized into the following chapters:

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

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

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

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

1.2 PROJECT LOCATION

The BRHO would apply to all unincorporated areas in the County. **Figure 2-2** in **Chapter 2.0** of this Addendum depicts the aforementioned.

1.3 LEAD AGENCY AND ADDRESS

County of Los Angeles
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

1.4 CONTACT PERSON AND PHONE NUMBER

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

1.5 STATUTORY AUTHORITY

CEQA recognizes that between the date an environmental document for a project is completed and the date that a project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is set may change; and/or 3) previously

unknown information can arise. Before proceeding with a project within the scope of a previously certified EIR, CEQA requires the lead agency to evaluate these changes to determine whether they affect the conclusions in the prior environmental document.

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

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

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

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

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

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

1.6 CEQA GUIDELINES UPDATES

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

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

1.7 BACKGROUND AND PLANNING HISTORY

On October 6, 2015 the County certified the General Plan Update EIR and adopted the General Plan Update for the County. The General Plan Update was a comprehensive update of the County General Plan (General Plan) and associated actions. The General Plan includes goals, policies, implementation programs, ordinances and zone changes. The General Plan covers the unincorporated areas and accommodates new housing and employment opportunities in anticipation of population growth as identified by the Southern California Association of Governments (SCAG). The General Plan Update responded to California State (State) laws current at the time it was written. The General Plan Update included revisions to the land use map and new text, proposing progressive, innovative programs and policies. The General Plan Update focuses growth in the unincorporated areas with access to services and infrastructure and reduces the potential for growth in environmentally sensitive and hazardous areas. The General Plan Update identifies the SCAG growth forecast, i.e., the anticipated population, employment and housing in the region for the year 2035.

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

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

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

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

1.8 OTHER PLANNING PROJECTS

On February 20, 2018, the County Board of Supervisors directed the County Department of Regional Planning (DRP) to prepare an ordinance to allow multi-family residential development by-right in certain zones where appropriate, along with other ordinances to address the affordable housing needs in the unincorporated areas of the County. The BRHO is one out of four ordinances that the County has drafted at the direction of the Board of Supervisors to address the affordable housing needs in the County. The other three ordinances are briefly described below.

Inclusionary Housing Ordinance: The Inclusionary Housing Ordinance (IHO) ensures the production of affordable units in new development by establishing affordable housing set-aside requirements on residential projects that meet certain criteria. These requirements are set at a level that can be supported on a financially feasible basis, as determined through an economic feasibility study.

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

Affordable Housing Preservation Ordinance: The Affordable Housing Preservation Ordinance (AHPO) considers a variety of strategies, including the regulation of condominium conversions and mobile home park closures, and one-for-one replacement or "no net loss" policies. Affordable housing preservation seeks to maintain the supply of lower-cost housing to avoid displacement of tenants or the loss of affordable units due to new development.

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

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

Cumulative Nature: The IHO, ISHO, and AHPO together with the ADU Ordinance would all facilitate implementation of the General Plan, particularly with respect to providing housing to support anticipated population growth. In addition, while all the ordinances would implement the General Plan they are also considered, for purposes of this Addendum, to be cumulative projects to one another as they have the ability to create additional units through zoning changes focused on housing. These ordinances would all work together to implement the General Plan and address the County's affordable housing needs. Therefore, in this Addendum, the cumulative analysis considers the impacts of the Proposed Project together with these related (but separate) housing ordinances.

1.9 MITIGATION REQUIREMENTS

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

Table 1-1
General Plan Update EIR Mitigation Measures

Air Quality	
AQ-1	<p>If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable Air Quality Management District (AQMD) adopted thresholds of significance, the County of Los Angeles Planning Department shall require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:</p> <ul style="list-style-type: none"> • Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. • Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards. • Limiting nonessential idling of construction equipment to no more than five consecutive minutes. • Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. • Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). • Pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. • Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust. • Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material. • Hydroseed or apply non-toxic soil stabilizers to inactive construction areas. • Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
AQ-2	<p>New industrial or warehousing land uses that: 1) have the potential to generate 40 or more diesel trucks per day and 2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County of Los Angeles Planning Department prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project.</p>

AQ-3	<p>Applicants for sensitive land uses within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities:</p> <ul style="list-style-type: none"> • Industrial facilities within 1000 feet • Distribution centers (40 or more trucks per day) within 1,000 feet • Major transportation projects (50,000 or more vehicles per day) within 1,000 feet • Dry cleaners using perchloroethylene within 500 feet • Gasoline dispensing facilities within 300 feet <p>Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHHA) and the applicable Air Quality Management District. The latest OEHHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:</p> <ul style="list-style-type: none"> • Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters <p>Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County of Los Angeles and shall be verified by the County's Planning Department.</p>
AQ-4	<p>If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to County of Los Angeles. Facilities that have the potential to generate nuisance odors include but are not limited to:</p> <ul style="list-style-type: none"> • Wastewater treatment plants • Composting, greenwaste, or recycling facilities • Fiberglass manufacturing facilities • Painting/coating operations • Large-capacity coffee roasters • Food-processing facilities <p>If an odor management plan is determined to be required through CEQA review, the County shall require the project applicant to submit the plan prior to approval to ensure compliance with the applicable Air Quality Management District's Rule 402, for nuisance odors. If applicable, the Odor Management Plan shall identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.</p>
Biological Resources	
BIO-1	<p>Biological resources shall be analyzed on a project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the project site, and focused surveys should be conducted as necessary to determine the presence/absence of special-status species (e.g., focused sensitive plant or wildlife surveys). A biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as an analysis of those species with potential to occur onsite).</p>
BIO-2	<p>If there is potential for direct impacts to special-status species with implementation of construction activities, the project-specific biological resources assessment report (as mentioned in Mitigation Measure BIO-1) shall include mitigation measures requiring preconstruction surveys for special-status species and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities, as appropriate. If special-status species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or monitoring, construction activity shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate offsite habitat areas. Relocations into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas should be the preferred goal of this measure. A qualified</p>

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

Greenhouse Gas Emissions	
GHG-1	The County shall monitor GHG emissions by updating its GHG emissions inventory every five years. Upon the next update to the CCAP, the inventory, GHG reduction measures, and GHG reductions should be forecasted to 2035 to ensure progress toward achieving an interim target that aligns with the long-term GHG reduction goals of Executive Order S 03 05. The CCAP update should take into account the reductions achievable due to federal and state action as well as ongoing work by the County government and the private sector. The 2035 CCAP update shall be complete by January 1, 2021 with a plan to achieve GHG reductions for 2035 or 2040 provided the state has an actual plan to achieve reductions for 2035 or 2040. New reduction programs in similar sectors as the proposed CCAP (building energy, transportation, waste, water, wastewater, agriculture and others) will likely be necessary. Future targets should be considered in alignment with state reduction targets, as feasible, but it is premature at this time to determine whether or not such targets can be feasibly met through the combination of federal, state, and local action given technical, logistical and financial constraints. Future updates to the CCAP should account for the horizon beyond 2035 as the state adopts actual plans to meet post-2035 targets.
Hydrology and Water Quality	
HYD-1	Prior to approval of a tentative map, future project applicants/developers shall provide proof to the Department of Public Works that all structures are located outside the 100-year floodplain.
Noise	
N-1	Construction activities associated with new development that occurs near sensitive receptors shall be evaluated for potential noise impacts. Mitigation measures such as installation of temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing non-essential idling of construction equipment to no more than five minutes shall be incorporated into the construction operations to reduce construction-related noise to the extent feasible.
N-2	Prior to the issuance of building permits for any project that involves a noise sensitive use within the 65 dBA CNEL contour (i.e., areas in or above 65 dBA CNEL) along major roadways and freeways the project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features (e.g., setbacks, berms, or sound walls), and/or required building acoustical improvements (e.g., sound transmission class rated windows, doors, and attic baffling) to ensure compliance with the County's Noise Compatibility Criteria and the California State Building Code and California Noise Insulation Standards (Title 24 of the California Code of Regulations).
N-3	New development that occurs within 200 feet of a railroad track (according to the FTA's vibration screening distances) shall be evaluated for potential vibration impacts. The project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features and/or required building construction improvements to ensure that vibration impacts would remain below acceptable levels of 0.08 RMS in/sec for residential uses.
N-4	Individual projects that use vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, near sensitive receptors shall be evaluated for potential vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the Federal Transit Administrations vibration annoyance criterion of 78 VdB at sensitive receptor locations), additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., drilled piles to eliminate use of vibration-intensive pile driver).
N-5	Prior to the issuance of building permits, proposed heavy industrial projects are required to provide evidence that vibration due to the operation of machinery would not adversely affect nearby vibration sensitive uses such as commercial, hotel, institutional, and residential uses. The project property owner/developers shall retain an acoustical engineer to conduct a vibration analysis and identify, where appropriate, project design features and/or required building/ equipment improvements to ensure that vibration impacts would remain below acceptable levels of 78 VdB at sensitive receptor locations. This vibration level is considered to be significant at vibration-sensitive uses. This can be accomplished with vibration-reducing measures such as, but not limited to, equipment placement, equipment selection, vibration dampers, and/or changes to operation modes (speed, power, frequency).
Population and Housing	
PH-1	Prior to adoption of the Antelope Valley Area Plan Update, the County shall identify land use changes to achieve a minimum jobs-housing ratio of 1.3 for the Antelope Valley Planning Area.
Public Services	
PS-1	Prior to issuance of building permits, future project applicants/developers shall pay the Los Angeles County Fire Department Developer Fee in effect at that time.
PS-2	Each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. Final fire flows shall be determined by LACoFD in accordance with Appendix B of the County Fire Code The required fire apparatus road and water requirements shall be in place prior to construction.

PS-3	Prior to approval of a tentative map, a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area, as required by Section 1117.2.1 of the County Fire Code and approved by LACoFD prior to building permit issuance.
PS-4	Prior to adoption of the Antelope Valley Area Plan, the County shall identify an implementation program to ensure adequate funding is available to provide law enforcement services within the Antelope Valley Planning Area. The funding mechanism must provide sufficient revenue to pay for land acquisition, engineering, construction, installation, purchasing, or any other direct costs for capital law enforcement facilities and equipment needed to serve the new development in the Antelope Valley Planning Area.
Transportation/Traffic	
T-1	The County shall continue to monitor potential impacts on roadway segments and intersections on a project by project basis as buildout occurs by requiring traffic studies for all projects that could significantly impact traffic and circulation patterns. Future projects shall be evaluated, and traffic improvements shall be identified to maintain minimum levels of service in accordance with the County's Traffic Impact Analysis Guidelines, where feasible mitigation is available.
T-2	The County shall implement over time objectives and policies contained within the General Plan Mobility Element. Implementation of those policies will help mitigate any potential impacts of Project growth and/or highway amendments on the transportation system.
T-3	The County shall participate with Metro, the Congestion Management Program (CMP) Agency in Los Angeles County, on a potential Congestion Mitigation Fee program that would replace the current CMP Debit/Credit approach. Under a countywide fee program, each jurisdiction, including the County, will select and build capital transportation projects, adopt a fee ordinance, collect fees and control revenues. A fee program will require a nexus analysis, apply only to net new construction on commercial and industrial space and additional residential units and needs to be approved by Metro and the local jurisdictions. A countywide fee, if adopted, will allow the County to mitigate the impacts of development via the payment of the transportation impact fee in lieu of asking each development project for individual mitigation measures, or asking for fair share payments of mitigation. The fee program would itself constitute a "fair share" program that would apply to all development (of a certain size) within the unincorporated areas.
T-4	The County shall work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent unincorporated areas. This includes adding or extending mixed flow general purpose lanes, adding or extending existing HOV lanes, adding Express Lanes (high occupancy toll lanes), incorporating truck climbing lanes, improving interchanges and other freeway related improvements.
T-5	<p>The County shall require traffic engineering firms retained to prepare traffic impact studies for future development projects to consult with Caltrans, when a development proposal meets the requirements of Statewide, regional, or area wide significance per CEQA Guidelines §15206(b). Proposed developments meeting the criteria of Statewide, regional or area wide include:</p> <ul style="list-style-type: none"> Proposed residential developments of more than 500 dwelling units Proposed shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. Proposed commercial office buildings employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space Proposed hotel/motel developments of more than 500 rooms When the CEQA criteria of regional significance is not met, Caltrans recommends transportation engineers and/or city representatives consult Caltrans when a proposed development includes the following characteristics: <ul style="list-style-type: none"> All proposed developments that have the potential to cause a significant impact to state facilities (right of way, intersections, interchanges, etc.) and when required mitigation improvements are proposed in the initial study. Mitigation concurrence should be obtained from Caltrans as early as possible. Any development which assigns 50 or more trips during peak hours to a state highway (freeways). Any development located adjacent to or within 100 feet of a State highway facility and may require a Caltrans Encroachment Permit. (Exceptions: additions to single family homes or 10 residential units or less). When it cannot be determined whether or not Caltrans will expect a traffic impact analysis pursuant to CEQA.

Utilities and Service Systems	
USS-1	Require the use of drought tolerant landscaping, native California plant materials, and evapotranspiration (smart) irrigation systems.
USS-2	Require the use of low-flow fixtures in all non-residential development and residential development with five or more dwelling units, which may include but are not limited to water conserving shower heads, toilets, waterless urinals and motion-sensor faucets, and encourage use of such fixtures in building retrofits as appropriate.
USS-3	Require low water use landscaping in new residential subdivisions and other private development projects, including a reduction in the amount of turf-grass.
USS-4	Promote the use of low-flow and/or waterless plumbing fixtures and appliances in all new non-residential development and residential development of five or more dwelling units.
USS-5	Support amendments to the County Building Code that would promote upgrades to water and energy efficiency when issuing permits for renovations or additions to existing buildings.
USS-6	Apply water conservation policies to all pending development projects, including approved tentative subdivision maps to the extent permitted by law. Where precluded from adding requirements by vested entitlements, encourage water conservation in construction and landscape design.
USS-7	Require new development to provide the infrastructure needed for delivery of recycled water to the property for use in irrigation, even if the recycled water main delivery lines have not yet reached the site, where deemed appropriate by the reviewing authority.
USS-8	Promote the installation of rainwater capture and gray water systems in new development for irrigation, where feasible and practicable.
USS-9	Promote energy efficiency and water conservation upgrades to existing nonresidential buildings at the time of major remodel or additions.
USS-10	Promote the use of permeable paving materials to allow infiltration of surface water into the water table.
USS-11	Maintain stormwater runoff on site by directing drainage into rain gardens, natural landscaped swales, rain barrels, permeable areas, and use of drainage areas as design elements, where feasible and reasonable.
USS-12	Seek methods to decrease impermeable site area where reasonable and feasible, in order to reduce stormwater runoff and increase groundwater infiltration, including use of shared parking and other means, as appropriate.
USS-13	On previously developed sites proposed for major alteration, provide stormwater management improvements to restore natural infiltration, as required by the reviewing authority.
USS-14	Encourage and promote the use of new materials and technology for improved stormwater management, such as pervious paving, green roofs, rain gardens, and vegetated swales.
USS-15	Where detention and retention basins or ponds are required, seek methods to integrate these areas into the landscaping design of the site as amenity areas, such as a network of small ephemeral swales treated with attractive planting.
USS-16	Evaluate development proposals for consistency with the County Green Building Standards Code.
USS-17	Promote Low Impact Development standards on development sites, including but not limited to minimizing impervious surface area and promoting infiltration, in order to reduce the flow and velocity of stormwater runoff throughout the watershed.
USS-18	Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.
USS-19	Monitor growth, and coordinate with water districts as needed to ensure that long-range needs for potable and reclaimed water will be met.
USS-20	If water supplies are reduced from projected levels due to drought, emergency, or other unanticipated events, take appropriate steps to limit, reduce, or otherwise modify growth permitted by the General Plan in consultation with water districts to ensure adequate long-term supply for existing businesses and residents.
USS-21	Upon the availability of non-potable water, discourage and consider restrictions on the use of potable water for washing outdoor surfaces.
USS-22	In cooperation with the Sanitation Districts and other affected agencies, expand opportunities for use of recycled water for the purposes of landscape maintenance, construction, water recharge, and other uses as appropriate.
USS-23	In coordination with applicable water suppliers, adopt and implement a water conservation strategy for public and private development.

1.10 SUMMARY COMPARISON OF SIGNIFICANT IMPACTS IDENTIFIED IN GENERAL PLAN UPDATE EIR COMPARED TO IMPACTS OF BY-RIGHT HOUSING ORDINANCE

This Addendum evaluates whether the new housing units expected to result from the BRHO would result in one or more new significant environmental impacts or more severe significant environmental impacts than previously identified in the General Plan Update EIR, thereby, requiring a major revision to that EIR. **Table 1-2** presents a summary of the analysis of the BRHO and whether it could result in new or more severe significant environmental impacts as compared to those identified in the General Plan Update EIR.

Chapter 3.0 of this Addendum includes a detailed evaluation of environmental effects associated with the BRHO, as compared to impacts identified in the General Plan Update EIR for each CEQA environmental factor area, organized in the same manner as the General Plan Update EIR. As discussed in Chapter 2, anticipated development under the BRHO represents a small fraction of the total reasonably foreseeable development analyzed in the General Plan Update EIR. The General Plan Update EIR evaluated all forecast land use development in the County that would be constructed and implemented/occupied between 2013 (the General Plan Update EIR baseline year) and 2035 and beyond. The BRHO is intended to facilitate development of housing units by facilitating and streamlining the review process for multi-family residential development. Locational criteria (described in detail in **Chapter 2.0**) limit the areas where the BRHO may be applied, but generally the BRHO would apply in the more urbanized portions of the County, as to be eligible for the BRHO, parcels must be outside of Very High Fire Hazard Severity Zones (VHFHSZ), Coastal Zones, Significant Ecological Areas (SEAs), and Hillside Management Areas (HMAs); and further, parcels must be served by public water and sewer systems, and front a highway or public street.¹

Table 1-2 below provides a summary of impacts as identified in the General Plan and analyzed in this Addendum.

¹ Certain minor exceptions to locational criteria are permitted; refer to Chapter 2 for details.

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

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Aesthetics		
Adverse effect on a scenic vista.	<p>Less than significant.</p> <p>The existing regulatory setting, as well as the goals and policies contained in the General Plan Update, would serve to lessen potential impacts to scenic vistas. Additionally, approval of the General Plan Update does not authorize construction of development that would affect scenic vistas. Therefore, under the General Plan Update EIR, impacts were found to be less than significant, and no mitigation measures were required.</p>	<p>Less than significant.</p> <p>The BRHO would not change the location where development would occur, nor would it increase development that is anticipated to occur as analyzed under of the General Plan Update EIR. The BRHO will only allow multi-family residential developments including mixed use developments by-right in urbanized areas of the County where residential development is generally expected and planned for. Further, the locational criteria in the BRHO requires that a by right project be outside any Significant Ecological Areas (SEAs). Hillside Management Areas (HMAs) and the Coastal Zone (CZ). Removal of the “U” suffix for certain lots that meet the locational criteria would continue to be consistent with the maximum allowable density in the General Plan. The increase from rounding up, instead of down, may slightly increase the number of housing units but the total housing units would still be within the allowable General Plan density. To the extent that the BRHO would result in additional development, it is anticipated that such development would be consistent with the General Plan Update and would not increase development beyond the growth that is already evaluated in the General Plan Update EIR. As found in the General Plan Update EIR, some impingements of views of scenic resources could occur, but overall impacts are anticipated to be less than significant. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Substantially damage scenic resources within a state scenic highway.	<p>Less than significant.</p> <p>The General Plan Update EIR concluded that no development or changes would occur along or near any of the three adopted state scenic highways within Los Angeles County. While some development or changes could occur near the eligible scenic highways, the development or changes anticipated to occur would be minimal and would only occur near small stretches of the eligible scenic highways. Furthermore, goals and policies of the General Plan would serve to minimize potential impacts to scenic highways. Therefore, the General Plan Update EIR concluded that no significant impact would result from implementation of the General</p>	<p>Less than Significant.</p> <p>The inclusion of locational criteria in the BRHO would not allow “by-right” multi-family development in Very High Fire Hazard Severity Zones (VHFHSZ), SEAs, HMAs, or sensitive habitat areas in the Coastal Zone. Therefore, designated scenic highways would not be impacted as they are all located in areas that are excluded due to the locational criteria. As stated above, the BRHO may increase the current number of housing units but total housing units would still be within the allowable General Plan density and growth assumptions. Impacts under the BRHO to other eligible scenic highways would be less than those anticipated for the General Plan Update because individual projects are anticipated to be developed within urbanized areas and not in</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	Plan with respect to substantial alteration of scenic resources within a designated scenic highway.	locations where any of these routes could be impacted. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur. The General Plan EIR found impacts would be less than significant.
Degradation of visual character.	Less than Significant. The General Plan Update EIR concluded the guiding principles, goals, policies, and implementation programs contained in the General Plan would serve to lessen or mitigate potential impacts by providing direction for future decision making, as well as by requiring additional future review of potential impacts of individual development projects that would be accommodated by the General Plan. Therefore, the General Plan Update EIR found impacts related to changes in visual character to be less than significant.	Less than Significant. The BRHO only allows multi-family residential developments including mixed use developments by-right in specified residential and commercial zones, which are typically located in urban areas. Therefore, as concluded in the General Plan Update EIR, changes in land use would generally be limited to areas that feature existing urban development. Individual projects are anticipated to be developed within urbanized areas and would be consistent with urban/suburban visual character. General Plan goals and policies would remain in effect to lessen and mitigate any potential impacts. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Increase in light and glare.	Less than Significant. The General Plan Update EIR concluded that development would generally occur in urbanized areas where existing lighting and light pollution are already high, these increases in light and glare would not be substantial. In rural areas of the County growth could also potentially diminish nighttime views and/or dark skies, but applicable regulations would minimize these impacts. The General Plan Update EIR found impacts related to light and glare would be less than significant.	Less than Significant. Individual projects developed in accordance with the BRHO are anticipated to occur where development already occurs and where existing lighting is typical of urban uses. Individual projects would be required to comply with County requirements addressing spillover light and glare, and projects would generally be limited to urbanized areas. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Agricultural and Forest Resources		
Convert Prime, Unique, or Important Farmland.	Significant and Unavoidable. The General Plan Update EIR concluded that implementation of the Agricultural Resource Area (ARA) policies under the General Plan would reduce both direct and indirect impacts of conversion of mapped Important Farmland. However, these ARAs would not be agricultural preserves and some conversion to non-agricultural uses would be permitted. As such, impacts due to anticipated growth under the General Plan were identified as significant in the Antelope Valley Planning Area and Santa Monica Mountains Planning Area. However, impacts in the remaining nine Planning areas were identified as less than significant.	No Impact. The BRHO's by-right streamlining provisions, zone changes, and clarifications do not change either the allowable uses or the entitlement process for these uses in agricultural zones. Therefore, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Conflict with zoning for agricultural use, or a Williamson Act contract.	No Impact. The General Plan Update EIR concluded that implementation of the zoning changes	No Impact. The BRHO will streamline certain multi-family residential developments by allowing them "by-

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	within the General Plan would not involve any rezoning of farmland and impacts regarding conversion of farmland to non-agricultural uses would be less than significant. Furthermore, the General Plan Update EIR identified that the only Williamson Act contracts in effect in Los Angeles County are located on Santa Catalina Island, of which there is no Important Farmland mapped.	right” in specified residential and commercial zones. Agricultural zoning would not be affected by the BRHO’s by-right streamlining provisions and associated zone changes. Therefore, impacts to Williamson Act contracts as a result of the development in accordance with the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Rezoning forestland or timberland.	No Impact. The General Plan Update EIR found that the General Plan includes the addition of two new zones created for future use in rural areas. However, neither of these zones are added to the Zoning Map. The remaining zones added as part of the General Plan would only be designated in intensely urban areas and would thus not impact forest land. As the County has no existing zoning specifically designating forest use, implementation of the General Plan would not conflict with existing zoning for forest land or timberland.	No Impact. The BRHO will allow only certain multi-family residential developments by-right in specified residential and commercial zones that meet the locational criteria as defined by the ordinance. Therefore, the BRHO’s by-right streamlining provisions and associated zone changes would not apply to existing zoning for forest land. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Loss or conversion of forest land to non-forest use.	Less than Significant. The General Plan Update EIR indicates that Forest land within Los Angeles County is protected through the County’s Significant Ecological Area (SEA) Ordinance. Compliance with the SEA Ordinance would reduce potential impacts to forest land to a less than significant level.	Less than Significant. The Angeles National Forest and Los Padres National Forest lie within the unincorporated areas of Los Angeles County and are managed by the U.S. Forest Service. The County also includes small areas of forest outside of the National Forests. These consist primarily of small areas in the Santa Monica Mountains, Sierra Pelona Mountains, and areas of the San Gabriel Mountains adjacent to the Angeles National Forest. These forest areas are zoned for watershed, open space, agriculture and a limited amount of low-density residential and rural commercial development. The locational criteria included in the BRHO for permit streamlining require that development be located outside SEAs. As discussed above, the locations where the ordinance would apply are currently zoned for residential or commercial development within the unincorporated portions of the County. Therefore, these areas are planned for development and impacts related to the loss of forest land would remain less than significant. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impact would occur.
Conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.	Significant and Unavoidable. The General Plan EIR found that in the Antelope Valley Planning Area and Santa Clarita Valley Planning Area there would be a significant indirect impact on conversion of mapped Important Farmland to nonagricultural use due to pressure to convert farmland to non-agricultural uses	No Impact. The BRHO’s permit streamlining provisions in Titles 21 and 22 would only apply collectively to residential zones R-2 and R-3; commercial zones C-1, C-2, C-3, C-M, and C-MJ; and mixed-use and the combining zones ()-DP and ()-CRS and not in any agricultural zones. Therefore, the BRHO would not result in conversion of Farmland to non-

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	and related incompatibilities between agricultural and urban uses. The General Plan Update EIR indicated that there are no feasible mitigation measures to reduce impacts to farmland in these areas. Impacts in the nine other Planning Areas would be less than significant.	agricultural use or conversion of forest land to non-forest use. Forests and farmland in the County are relatively isolated from urban areas. Developments allowed “by-right” under the BRHO are likely to occur in urbanized areas given the zones listed above and where location criteria apply. Therefore, forests and farmlands would not be significantly impacted. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Air Quality		
Conflict with or the potential to obstruct implementation of the applicable air quality plan.	Significant and Unavoidable. The General Plan Update EIR indicates buildout of the General Plan in 2035 would result in higher populations for the unincorporated areas of the County. The General Plan Update EIR concludes that individual development projects would be consistent with the control measures and regulations identified in the SCAQMD and AVAQMD’s AQMPs. However, the General Plan EIR found that development would not be consistent with the AQMPs because the buildout in the unincorporated areas would exceed forecasts in the AQMP.	Significant and Unavoidable. The BRHO will facilitate and streamline multi-family residential developments by allowing them “by-right” in specified zones. These zones, as described above, include existing residential and commercial zones. The BRHO would not increase the growth and development beyond what is anticipated from development under the General Plan Update. Since the release of the General Plan Update EIR, the SCAQMD adopted an updated AQMP in 2017 that incorporates SCAG’s updated population projection numbers from the 2016/2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that would account for the SCAG forecast population increase in the County; anticipated development under the General Plan Update continues to exceed 2016/2040 and current (2020 Connect SoCal) SCAG forecasts . The AVAQMD’s Ozone Attainment Plan has not been updated and anticipated development under the General Plan Update could continue to exceed the AVAQMD’s plan. Impacts under the BRHO would not be greater than those evaluated in the General Plan EIR. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Violate any air quality standard or contribute substantially to existing or projected air violation.	Significant and Unavoidable. The General Plan Update EIR concluded that for a broad-based General Plan, it is not possible to determine whether the scale and phasing of individual projects could result in the exceedance of the SCAQMD’s or the AVAQMD’s short-term regional or localized construction emissions thresholds. Mitigation Measure AQ-1, regulatory measures, as well as goals and policies in the General Plan would reduce air pollutant emissions. However, due to the likely scale and extent of construction activities pursuant to the future development that would be accommodated by the General Plan, at least some projects would likely continue to exceed the SCAQMD and AVAQMD thresholds. Therefore, the	Significant and Unavoidable. As under the General Plan Update, construction of multiple projects simultaneously could result in total daily construction emissions exceeding regional thresholds and therefore emissions associated with construction could be significant. Such emissions would be within the assumptions identified in the General Plan EIR. As indicated in the General Plan Update EIR, the risk posed from Valley Fever would be reduced to less than significant levels with the implementation of the SCAQMD or AVAQMD’s fugitive dust measures. However, even with the implementation of Mitigation Measure AQ-1, regulatory measures, as well as general plan goals and policies, it is likely that some projects would exceed the relevant SCAQMD and AVAQMD criteria air pollutant thresholds, as described above, these impacts were

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	General Plan EIR determined construction-related air quality impacts of anticipated development under the General Plan Update would be significant and unavoidable.	fully disclosed within the General Plan Update EIR and no new or greater impacts would occur.
Cumulatively considerable net increase of any criteria pollutant	<p>Less than Significant.</p> <p>The General Plan Update EIR concluded that anticipated development under the General Plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Mitigation Measure AQ-1 as well as General Plan goals and policies would reduce these impacts. However, due to the magnitude of emissions generated by the buildout, mitigation measures would not reduce impacts below SCAQMD's or AVAQMD's thresholds. The General Plan Update EIR found impacts would be significant and unavoidable.</p>	<p>Less than Significant.</p> <p>The BRHO would not increase the growth and development beyond what is anticipated from development evaluated in the General Plan Update EIR. Development related to the BRHO would likely be within urbanized areas and would incentivize transit and active transportation. While the BRHO could incentivize the development of housing projects, overall, it is not anticipated to result in development greater than the growth assumptions in the General Plan Update. As a result, the cumulative air quality emissions associated with the BRHO are already evaluated in the General Plan Update EIR. The BRHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Expose sensitive receptors to substantial pollutant concentrations.	<p>Less than Significant with Mitigation.</p> <p>The General Plan Update EIR indicated that, due to the broad-based nature of the EIR, it was not possible to determine whether the scale and phasing of individual projects would result in the exceedance of localized emissions thresholds. Nevertheless, because of the likely scale of future development that would be accommodated under the General Plan, at least some projects were expected to individually result in exceedances of the CAAQS and/or NAAQS. New land uses in the unincorporated areas are expected to generate truck trips that could generate an increase in DPM that would contribute to cancer and non-cancer risks in the SoCAB and/or Antelope Valley portion of the MDAB. These increased truck trips could impact existing sensitive receptors. Since the nature of these emissions could not be determined at the time of General Plan preparation, the impacts are considered significant. Mitigation Measure AQ-3 would ensure that placement of sensitive receptors near major sources of air pollution would achieve the incremental risk thresholds established by SCAQMD and AVAQMD, and impacts would be less than significant.</p>	<p>Less than Significant with Mitigation.</p> <p>The BRHO would not generate new sources of mobile or stationary-source TAC emissions typically associated with industrial or commercial processes. Mitigation AQ-3 would remain in effect to reduce potential impacts to a less than significant level. The BRHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Create objectionable odors.	Less than Significant with Mitigation. The General Plan Update EIR concluded that industrial land uses associated with the General Plan could create objectionable odors. However, Mitigation Measure AQ-4 would ensure that odor impacts are minimized, and facilities would comply with SCAQMD and AVAQMD Rule 402. Therefore, impacts were considered less than significant.	Less than significant with Mitigation. The BRHO only allows certain multi-family residential projects “by-right” in specified zones as defined within the ordinance. Therefore, the BRHO would not encourage the development of industrial land uses that could create objectionable odors. Residential use is not associated with odor nuisance and therefore this impact is less than significant. The BRHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Biological Resources		
Effect on candidate, sensitive, or special status species.	Significant and Unavoidable. The General Plan Update EIR concluded that the anticipated development under the General Plan Update will result in impacts to various habitat types, which will result in the loss of special-status species through direct mortality or via indirect effects (e.g., through wildlife habitat loss and edge effects at the urban-wildland interface). Mitigation Measures BIO-1 and BIO-2 would reduce direct impacts, there is no mitigation provided for the indirect impacts to special-status species through the loss of common (i.e., non-sensitive) habitats. Thus, impacts are considered significant and unavoidable.	Significant and Unavoidable. The BRHO would not make changes to any SEA designations or policies. The BRHO’s permit streamlining provisions would only apply to specified residential and commercial zones; locational criteria in the BRHO also requires that any by-right developments under the ordinance be situated outside of any SEA, HMA, or the CZ. Therefore, the areas impacted by the BRHO’s permit streamlining provisions would likely occur within urban areas. Generally, these areas provide little, if any, biological resources in the form of habitat, species or plant communities therefore, threatened, endangered, protected and sensitive species, and habitats, are not anticipated to be affected. Projects associated with the BRHO which occur within SEA designated areas would be subject to all existing regulations in the SEA. Mitigation Measures BIO-1 and BIO-2 would remain in effect to mitigate potential direct impacts to a less than significant level. However, indirect impacts would remain significant and unavoidable, as was determined in the General Plan Update EIR. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Effect on riparian habitats, other sensitive natural communities.	Less than Significant with Mitigation. The General Plan Update EIR concluded that development under the General Plan will impact various habitat types, including riparian habitat and other sensitive plant communities. Mitigation Measures BIO-1 and BIO-3 would reduce impacts to sensitive habitat to a less than significant level.	Less than Significant with Mitigation. The BRHO would only allow certain multi-family residential developments in areas currently designated as multi-family or commercial. The locational criteria require by-right projects developed under the BRHO be outside many of the areas with the most sensitive natural communities such as SEAs, HMAs, and the coastal zone. Further, Mitigation Measure BIO-1 and BIO-3 would remain in effect to reduce potential impacts to a less than significant level. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or expanded impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Effect on protected wetlands.	<p>Less than Significant with Mitigation.</p> <p>The General Plan Update EIR concluded that anticipated development under the General Plan may impact wetland areas and these impacts may have a significant adverse effect on wetlands through hydromodification, filling, diversion or change in water quality. Mitigation Measure BIO-1 would in combination with the requirements for regulatory permitting (e.g., Section 404 permitting and any associated mitigation requirements), impacts to wetlands would be considered less than significant.</p>	<p>Less than Significant.</p> <p>Impacts to federally or state protected wetlands and waters of the United States are limited by building requirements and discretionary permit review processes. Since the most sensitive of these resources are protected in the General Plan Update, the impacts of the ordinance would be less than what was identified in the General Plan Update EIR. For waterways in the County that are not located in special management areas, the General Plan Update includes policies to preserve wetlands and streambeds. In addition, state and federal agencies are involved in the review and permitting of projects in these areas when necessary. Further, the locational criteria in the BRHO require that by-right projects developed under the BRHO be outside the areas most likely to include wetlands, such as SEAs, HMAs, and the coastal zone. Therefore, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Potential to interfere with movement of wildlife species.	<p>Significant and Unavoidable.</p> <p>The General Plan Update EIR indicated that development could impact regional wildlife linkages and nursery sites, constituting a potentially significant adverse effect on wildlife movement and nursery sites. Mitigation Measure BIO-1 and the SEA Ordinance provide some protection to avoid or minimize impacts to wildlife corridors and nursery sites; however, for those projects where avoidance or minimization of impacts is infeasible, the policies proposed in the General Plan do not provide for mitigation for loss of wildlife movement opportunities or nursery sites. If development impacts regional wildlife linkages and impedes wildlife movement, connectivity will be lost on a regional scale in these vital landscape corridors and linkages. Thus, impacts to wildlife movement are significant and unavoidable.</p>	<p>Less than Significant.</p> <p>Many of the areas that are identified as wildlife linkages or that serve as important habitat and/or connections between habitat and wildlife migratory routes, are zoned for watershed, open space, agriculture and a limited amount of low-density residential development. The BRHO would only apply within specified residential and commercial zones, and therefore, in general, would not affect areas that provide wildlife linkages or nursery sites. The BRHO would not increase development beyond what is already anticipated under the General Plan Update. Further, the locational criteria in the BRHO require by-right projects developed under the BRHO be outside the areas most likely to include wildlife movement corridors or nursery sites, such as SEAs, HMAs, and the coastal zone. Therefore, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Potential to conflict with any local policies protecting biological resources, such as a tree preservation ordinance.	<p>Less than Significant.</p> <p>The General Plan Update EIR indicates that development will impact oak trees and oak woodlands. The County Oak Tree Ordinance and Oak Woodlands Conservation Management Plan (OWCMP) are applied on a project-specific level and consistency with these plans is determined on a project-by-project basis. The General Plan Update EIR found that the policies of the General Plan support the conservation of oak trees and oak woodlands and do not conflict with the County Oak Tree</p>	<p>Less than Significant.</p> <p>BRHO projects would still be subject to the regulations within the Oak Tree Ordinance. The BRHO streamlines multi-family residential projects in specified zones. It also clarifies how density shall generally be calculated pursuant to the General Plan land use designations with fractional numbers rounded up. Projects subject to the BRHO would be developed on lots already zoned for residential or commercial uses; therefore, development would not increase beyond the anticipated development the General Plan Update EIR. Further, the removal of oak trees requires appropriate permits and</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	Ordinance or OWCMP.	approvals through the Los Angeles County Department of Regional Planning, such as Oak Tree Permits. The BRHO would not make any changes to the County Oak Tree Ordinance or OWCMP. Therefore, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Potential to conflict with the provisions of an adopted habitat conservation plan.	Less than Significant. The General Plan Update EIR found that the policies of the General Plan Update would not conflict with these goals and policies of these plans and Local Coastal Plans (LCPs) and that impacts would be less than significant.	Less than Significant. The BRHO would not make any changes to the coastal land use plans and local coastal programs, because the locational criteria for permit streamlining would require that by-right projects subject to the BRHO be outside of an SEA, and/or the Coastal Zone, including those covered by a Local Coastal Plan (LCP). The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Cultural Resources		
Significant historical resources.	Significant and Unavoidable. Large number of historical resources could be disturbed. The General Plan Update EIR concluded that compliance with the goals, policies, and implementation measures of the General Plan would reduce impacts to historical resources. However, the policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the General Plan. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur in the future. Mitigation Measures CUL-1, CUL-2, and CUL-3 would reduce impacts to historic resources, but impacts are considered significant and unavoidable.	Significant and Unavoidable. It is speculative at this time to identify the loss of any particular resource. However, impacts to historical resources are identified and disclosed in the General Plan Update EIR. While there is the potential for impacts to occur at individual sites, these impacts would be within those identified in the General Plan Update EIR. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Archaeological Resources.	Less than Significant with Mitigation. The General Plan Update EIR concluded that development could impact known and unknown archaeological sites. However, existing federal, state, and local regulations address the provision of studies to identify archaeological resources. Mitigation Measures CUL-4 and CUL-5, which apply	Less than Significant with Mitigation. The BRHO's provisions would generally be expected to apply in urban areas where sites are already developed, and impacts would not be substantial since land is already disturbed and resources already impacted. If unexpected archaeological or paleontological resources are discovered during excavation activities such

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, would reduce impacts to a less than significant level.	resources must be evaluated in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code § 21083.2, Health and Safety Code § 7050.5, Public Resource Code § 5097.98, and Guidelines § 15064.5(e) address how unexpected finds of human remains are to be handled. In addition, mitigation measures identified in the General Plan Update EIR would apply to development under the BRHO. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Unique Paleontological Resources.	Less than Significant with Mitigation. The General Plan Update EIR indicates ground disturbance could damage fossils buried in soils. Abundant fossils occur in several rock formations in the County. These formations have produced numerous important fossil specimens. Therefore, the County contains significant, nonrenewable, paleontological resources and are considered to have high sensitivity. Implementation of Mitigation Measures CUL-4 and CUL-5 would reduce impacts to a less than significant level.	Less than Significant with Mitigation. The BRHO's provisions would generally be expected to apply in urban areas where sites are already developed, and impacts would not be expected to occur. In cases where undeveloped parcels are found to contain paleontological resources, or parcels that are adjacent to paleontological resources, may have to undergo mitigation per consultation with a designated paleontologist or archeologist, consistent with Mitigation Measure CUL-4. In the event that paleontological resources are encountered during the construction process, the project would be required to halt all development activities and retain the services of a qualified paleontologist, who can advise when construction activities can recommence, per the Public Resource Code (PRC) § 5097.5. Compliance with these guidelines would ensure no new or greater impacts would occur. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Human remains.	Less than Significant. The General Plan Update EIR determined that excavation during construction activities has the potential to disturb human burial grounds, including Native American burials, in underdeveloped areas of Los Angeles County. However, there are Public Resources Code § 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (§§ 7050.5, 7051, and 7054) also have provisions protecting human burial remains from disturbance, vandalism, or destruction. Therefore, compliance with these regulations would ensure impacts to human burial grounds are less than significant.	Less than significant. Projects subject to the BRHO would be required to comply with Public Resources Code § 5097.98 as well as the Health and Safety Code (§§ 7050.5, 7051, and 7054). The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Tribal Cultural Resources		
Adverse change in the significance of a tribal cultural resource	Less than Significant with Mitigation The General Plan Update EIR concluded that development of projects pursuant to the General Plan Update could impact known and unknown archaeological sites. The General Plan Update EIR noted that at the time there were 85 Native American sacred sites under CEQA in association with archaeological resources or, in the case of burial locations, human remains. The Project Area is considered potentially sensitive for archaeological resources. However, Mitigation Measure CUL-4, which applies in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, would reduce impacts to a less than significant level.	Less than Significant with Mitigation The BRHO's zone changes and streamlining provisions would generally be expected to apply in urban areas where sites are already developed, and impacts would not be substantial. However, projects subject to the BRHO may cause impacts to unknown archaeological sites containing tribal cultural resources. Mitigation Measure CUL-4 would continue to apply, and impacts would be reduced to a less than significant level. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Geology and Soils		
Earthquake faults, ground shaking, ground-failure, liquefaction, landslides.	Less than Significant. Compliance with existing state and county regulations, as well as the goals and policies included as part of the General Plan would ensure that impacts associated with exposure to strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides are reduced to a less than significant level.	Less than Significant. The BRHO would not increase development beyond what is anticipated under the General Plan Update. Development under the BRHO would not exacerbate existing earthquake faults and associated risks conditions. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Soil erosion and loss of topsoil	Less than Significant. Construction and site grading of future development projects pursuant to the General Plan Update could cause substantial soil erosion without effective soil-erosion measures. Adherence to the requirements of the County Code and the CBC, together with the safeguards afforded by the County's building plan check and development review process, would help ensure that appropriate erosion controls are devised and implemented during construction. Furthermore, construction activities on project sites larger than one acre would be subject to National Pollution Discharge Elimination System (NPDES) requirements. Required erosion control measures may include temporary and/or permanent erosion control measures such as desilting basins, check dams, riprap or other devices or methods, as approved by the County. Consequently, impacts would be less than significant.	Less than Significant. Residential projects subject to the BRHO would be required to comply with CBC regulations and the County's development review process, which would ensure appropriate erosion controls are devised and implemented during project construction. Applicable BRHO projects would also have to comply with NPDES requirements as appropriate. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Unstable geologic unit or expansive soil	<p>Less than Significant.</p> <p>Anticipated development under the General Plan would increase numbers of residents, workers, and structures in Los Angeles County. The County is geographically expansive, embracing a variety of geologic settings and soil types. Areas of unstable geologic units or unstable or expansive soils are known to occur locally. Development considered for approval under the General Plan could expose structures or persons to potentially significant hazards due to unstable geologic units or soils. Compliance with existing state and county regulations, as well as the goals and policies included as part of the General Plan would ensure that the impacts associated with erosion and topsoil loss, as well as development atop unstable geologic units and soil, or expansive soil are minimized to the maximum extent practicable. Consequently, the overall, associated impacts would be less than significant.</p>	<p>Less than Significant.</p> <p>Development under the BRHO has the potential to expose structures or persons to hazards due to unstable geologic units or soils. However, compliance with existing state and county regulations, as well as relevant General Plan Update goals and policies, would ensure that no new or greater impacts would occur. Development under the BRHO would not exacerbate existing soil conditions. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Septic tanks or alternative waste water disposal systems	<p>Less than significant.</p> <p>The General Plan Update EIR concluded that soil conditions would adequately support proposed septic tanks. Most new development that is anticipated in the County would not require the use of septic tanks or alternative wastewater disposal systems. In those few cases where septic systems might be necessary, such as rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, the prevailing soil conditions in Los Angeles County are generally amenable to the use to such systems. In addition, all on-site wastewater treatment systems (OWTS) will be required to comply with County Code, Titles 11 and 28 and other regulations applicable to OWTS, including requirements for preparation and submittal of feasibility reports in order to obtain the Department of Public Health - Environmental Health approval for construction and installation of OWTS. As such, there would be no impact from implementation of the General Plan at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. Impacts would be less than significant.</p>	<p>Less than Significant.</p> <p>The BRHO does not increase development beyond what is already anticipated in the General Plan Update EIR. Further, as required by the locational criteria, projects that are eligible for permit streamlining under must be located on lots that are served by a public sewer system. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Greenhouse Gas Emissions		
GHG emissions	<p>Significant and Unavoidable.</p> <p>The General Plan Update EIR concluded that buildout of the General Plan would generate greenhouse gas (GHG) emissions that would have a significant impact on the environment. The General Plan would contribute to global climate change through direct and indirect emissions of GHG from land uses within the unincorporated areas. Impacts from GHG emissions within the unincorporated areas would be significant for long-term growth anticipated under the General Plan. Mitigation Measure GHG-1 as well as the Community Climate Action Plan (CCAP) would reduce impacts from buildout of the General Plan. However, additional statewide measures would be necessary to reduce GHG emissions under the General Plan to meet the long-term GHG reduction goals. Since no additional statewide measures are available, impacts are significant and unavoidable.</p>	<p>Significant and Unavoidable.</p> <p>Since the release of the General Plan Update, the state has passed Senate Bill 32 (SB 32), which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. However, similar to the General Plan Update, even with the implementation of Mitigation Measure GHG-1 and CCAP measures, additional statewide measures are necessary to reduce GHG emissions to meet the long-term GHG reduction goals. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Conflict with applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.	<p>Significant and Unavoidable.</p> <p>To achieve the local goals identified in CARB's 2008 Scoping Plan, the General Plan included the CCAP which identifies and evaluates feasible and effective policies to reduce GHG emissions. Implementation of the CCAP would be necessary to ensure that the local GHG reduction goals for the County under AB 32 would be met. Adoption and implementation of the CCAP in its entirety would reduce GHG emissions to less than significant levels. However, in the absence of an adopted CCAP, consistency with plans adopted for the purpose of reducing GHG emissions toward the short-term target of AB 32 could be significant. Impacts would be significant and unavoidable.</p>	<p>Less than Significant.</p> <p>The BRHO will be consistent with the statewide GHG reduction policies evaluated within the General Plan. As described above, since the adoption of the General Plan Update in 2015, the state has passed SB 32, which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. The General Plan Update determined that the CCAP was necessary to meet local goals within the 2008 CARB Scoping Plan to meet AB 32. Projects subject to the BRHO within the unincorporated portions of the County will be consistent with the CCAP in promoting housing near transit and constructed energy efficient homes consistent with the County's Green Building Regulations. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Hazards and Hazardous Materials		
Routine transport, use, or disposal of hazardous materials; Accidental or reasonably foreseeable release of hazardous materials into the environment; Emit hazardous materials in proximity to schools.	Less than Significant. Numerous federal, state and local regulations exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. Implementation of the General Plan would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses would be required to comply with applicable federal, state and local regulations related to hazardous materials. Required compliance with these regulations would ensure impacts related to transport, use and disposal of hazardous materials would be less than significant.	Less than Significant. Construction of new housing could require the demolition of existing buildings which could contain hazardous materials such as asbestos or lead paint. Handling of hazardous materials in the course of construction would be regulated by existing Health & Safety Code and Fire Code requirements. In some cases, a project level environmental assessment would determine the potential for impacts as well as any required mitigation. Further, projects subject to the BRHO are residential projects that do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the BRHO would not involve the substantial transport, use, and disposal of hazardous materials. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Project that is on a list of hazardous materials site.	Less than Significant. Compliance with applicable existing regulations and processes would ensure that the General Plan would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites.	Less than Significant. The BRHO would facilitate and streamline multi-family residential projects in the specified zones as defined in the ordinance. Some projects subject to the BRHO could occur on contaminated sites. However, federal and state regulations as well as policies within the Land Use Element of the General Plan would reduce the potential for the public and the environmental to be exposed to hazardous materials from existing site conditions. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Hazards from airports and airstrips.	Less than Significant. Implementation of the General Plan may result in land use designations that allow development within two miles of a public airport, private airstrip, or heliport. However, existing FAA regulations, County policies and regulations, and General Plan goals and policies are intended to identify and properly address potential airport hazards prior to implementation of specific projects within the County.	Less than Significant. The locational criteria r permit streamlining would require that by-right projects subject to the BRHO be outside of the 70 or above decibel Community Noise Equivalent Level (dB CNEL) noise contour of an airport influence area, as depicted in the Los Angeles County General Plan. Furthermore, all projects would continue to be subject to existing FAA regulations, County policies and regulations, and General Plan Update goals and policies intended to address potential airport hazards to specific projects. As such, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Impair implementation of emergency response plan.	Less than Significant. Compliance with applicable regulations and implementation of the General Plan goals and policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation	Less than Significant. The BRHO would not increase population or the number of total housing units as compared to what was evaluated within the General Plan Update EIR. Projects subject to the BRHO would be required to implement applicable regulations as well as General Plan Update goals and policies to reduce

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	plan is less than significant.	the risk of impaired implementation or physical interference of an adopted emergency response plan or emergency evacuation plan. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Wildfire risk.	<p>Less than Significant.</p> <p>The General Plan Update EIR concludes that policies and conditions of approval for future development projects within the County, in addition to compliance with applicable regulations, will minimize impacts related to wildland fires.</p>	<p>Less than Significant.</p> <p>The BRHO facilitates and streamlines the review process for certain multifamily projects. The locational criteria would not allow multi-family residential developments “by-right” within Very High Fire Hazard Severity Zones. Based on the affected zones, projects subject to the BRHO’s permit streamlining provisions would likely be built in urban areas that are accessible to services and municipal water systems. Any projects subject to the BRHO constructed in these areas as a result of this ordinance would be regulated by existing Health & Safety Code, Building Code and Fire Code requirements. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Hydrology and Water Quality		
Violate water quality standards or waste discharge requirements.	<p>Less than Significant.</p> <p>The General Plan Update EIR concluded that implementation of the General Plan Update would comply with water quality standards and waste discharge requirements and would not substantially degrade water quality. Construction projects of one acre or more in area in each of the three Water Board regions (Los Angeles, Lahontan, and Central Valley) would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2012. Projects obtain coverage by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. Impacts would be less than significant upon compliance with regulatory requirements and General Plan policies.</p>	<p>Less than Significant.</p> <p>By-right multi-family projects subject to the BRHO would be required to develop and implement a SWPPP and BMPs to minimize pollution of runoff. As such, impacts would remain less than significant upon compliance with regulatory requirements and General Plan Update policies. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Groundwater depletion, interfere with recharge.	<p>Less than Significant.</p> <p>The General Plan Update EIR concluded that development pursuant to the General Plan would interfere with groundwater recharge. Developments in the unincorporated areas of Planning Areas would be mostly limited to redevelopments and reuses of currently developed areas. Thus, redevelopments in those Planning Areas would result in relatively minor increases in impervious areas.</p>	<p>Less than Significant.</p> <p>The BRHO is not expected to result in new development that would not otherwise occur as the permit streamlining provisions would only apply to specified residential and commercial zones located outside of the specified locational criteria and in urban areas. Therefore, it is unlikely there would be any increase in impervious surface as a result of the BRHO. Further, these projects would be subject to the County's Low Impact Development Ordinance which requires project runoff now exceed pre-development conditions. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Alter drainage patterns resulting in substantial erosion or siltation.	<p>Less than Significant.</p> <p>The General Plan Update EIR concluded the General Plan would not substantially alter drainage patterns in Los Angeles County and would not result in substantial erosion or siltation. Under the MS4 Permit certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. These requirements would ensure that there would not be a substantial change in drainage patterns in the Los Angeles Water Board Region, Lahontan Water Board Region, and Central Valley Water Board Region. Impacts would be less than significant.</p>	<p>Less than Significant.</p> <p>Similar to the General Plan Update, by-right multi-family residential projects subject to the BRHO are required to mimic predevelopment hydrology, evapotranspiration, and rainfall harvest as required by the MS4 permit. As a result, the BRHO would not create a substantial change in drainage patterns to the Los Angeles Water Board Region, Lahontan Water Board Region, or the Central Valley Water Board Region. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Alter drainage patterns resulting in substantial increase in surface runoff.	<p>Less than Significant.</p> <p>Developments pursuant to the General Plan would not substantially increase runoff rates or volumes and substantial consequent flood hazards would not occur. The General Plan EIR found impacts would be less than significant.</p>	<p>Less than Significant.</p> <p>Development, including under the BRHO, would occur in either the Los Angeles or Central Valley Water Board Regions. The MS4 permits in these areas require that projects mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Any grading or paving would need to comply with LID and NPDES requirements to receive construction permits. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Housing in 100-year flood hazard area; Placing structures to 100-year flood hazard area that could impede flood flows.	<p>Less than Significant.</p> <p>The General Plan Update EIR found that forecast housing development could occur within 100-year flood hazard areas. However, development within 100-year flood zones would require improvements to flood control facilities, and issuance of Letters of Map Revision by the Federal Emergency Management Agency (FEMA) showing changes to 100-year flood zones reflecting such improvements; or that the</p>	<p>Less than Significant.</p> <p>Development, including that subject to the BRHO, occurring in a flood zone, is required to improve flood control facilities and obtain a Letter of Map Revision from FEMA to demonstrate improvement; or construct floor beams raised above the 100-year flood elevations. Additionally, such development would be required to comply with the County's municipal code for building within flood-prone areas. The BRHO would not substantially change impacts as compared to those</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	floor beams of the lowest floor of the structure are raised above the 100-year flood elevation. Flood insurance available through the National Flood Insurance Program (NFIP) would also be required. Therefore, buildout of the General Plan would not place substantial numbers of people or structures at risk of flooding in 100-year flood zones, and impacts would be less than significant.	identified for the General Plan Update; no new or greater impacts would occur.
Flooding.	Less than Significant. The general Plan Update EIR indicates that dam inundation areas span some unincorporated areas of all the County except the South Bay Planning Area; and parts of the Antelope – Fremont Valleys, Santa Clara, San Gabriel River, Santa Monica Bay, Los Angeles River, and San Pedro Channel Islands watersheds. Considering the relatively small proportional net increases in numbers of residents and workers that would be put at potential risk from dam inundation; the operation of most of the dams as flood control dams, not impounding large reservoirs most of the time; and safety requirements and inspections by the Division of Safety of Dams, the General Plan EIR found that impacts would be less than significant.	Less than Significant. It is possible that projects subject to the BRHO could result in development within a dam inundation zone. However, as noted in the General Plan Update EIR, the number of residents that could be put in potential risk is relatively small. Moreover, most of the dams are flood control dams subject to the safety requirements and inspections by the Division of Safety of Dams. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Seiche, tsunami, mudflow.	Less than Significant. As analyzed in the General Plan Update EIR, parts of the County are subject to inundation by seiche, tsunami, or mudflow. Anticipated development under the General Plan would not subject substantially increased numbers of people or structures to tsunami flood hazards. Therefore, anticipated development under the General Plan would not subject substantially increased numbers of people or structures subject to tsunami flood hazards. Impacts would be less than significant.	Less than Significant. The presence of a potential landslide hazard is determined at the project level and is addressed by existing regulatory requirements. The County includes 75 miles of coastline, coastal areas near this coastline lie in tsunami hazard zones, as provided by the California Department of Conservation. The locational criteria for permit streamlining would require that by-right projects subject to the BRHO be outside of the Coastal Zone. Furthermore, the Local Coastal Program contains analysis and policies governing assessment and mitigation of tsunami and seiche risk. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Land Use and Planning		
Potential to physically divide a community.	Less than Significant. The General Plan identifies proposed and planned roadways in Los Angeles County. At a programmatic level, the General Plan does not allow land uses patterns that would result in division of an established neighborhood or community. Although policy maps included in the Land Use and Mobility Elements of the General Plan	Less than Significant. The BRHO would not incentivize the construction of transportation or other types of projects that have the ability to physically divide an area. The BRHO would facilitate and streamline multifamily housing in zones that are consistent with such housing and as such would not be expected to create any physical barriers. Projects subject to the BRHO would be consistent with the allowable

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	identify locations for Transit Oriented Districts, highways, and transit projects, these changes and improvements are not anticipated to divide established neighborhoods. Impacts would be less than significant.	densities specified in the General Plan Land Use Element. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Conflict with any applicable land use plan, policy, or regulation.	Less than Significant. The General Plan Update EIR concluded that the General Plan Update would not conflict with goals contained within SCAG's 2012–2035 RTP/SCS or other land use plans. Therefore, impacts related to compatibility between the General Plan and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant.	Less than Significant. The BRHO would be consistent with local land use plans, goals, and policies calling for more housing, affordable housing, and transit serving development. Development under the BRHO would be within that evaluated in the General Plan Update EIR. The BRHO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by expanding the supply of housing. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Conflict with any applicable habitat conservation plan.	Less than Significant. The General Plan Update EIR concluded that the General Plan Update would not conflict with adopted habitat conservation plans. Although buildout of the General Plan would include development and redevelopment in areas covered by conservations plans, such development would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.	Less than Significant. No conflict would occur, as locational criteria for by-right multi-family residential projects under the BRHO would require that all of these projects are outside of the Coastal Zone, as defined in Division 2 (Definition), in its entirety, and any Significant Ecological Area, as defined in Division 2 (Definition), in its entirety. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Mineral Resources		
Loss of availability of mineral resource of value to region or state.	Significant and Unavoidable. The General Plan Update EIR concluded that implementation of the General Plan would cause the loss of availability of a known mineral resource in the Antelope Valley Planning Area but not in the other 10 Planning Areas. No mitigation measures are available that would reduce impacts of anticipated development from the General Plan.	Less than Significant. While by-right projects subject to the BRHO could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the BRHO are currently in use as mineral extraction. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Loss of availability of locally important mineral resource recovery site.	Significant and Unavoidable. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for loss of availability of mineral resources. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in Los Angeles County due to the very high cost of transporting aggregate.	Less than Significant. The BRHO is not likely to affect mineral resource zones or otherwise result in the loss of locally important mineral resources. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Noise and Vibration		
Generation of noise levels in excess of standards	<p>Significant and unavoidable.</p> <p>The General Plan Update EIR found that anticipated development would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment. Implementation of policies within the General Plan would reduce traffic noise impacts to existing noise sensitive uses to the extent feasible. However, no additional feasible mitigation measures are available to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within Los Angeles County that would be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site traffic noise impacts to existing uses (such as through the construction of sound walls and/or berms) may often be out of proportion with the level of impact. Impacts were found to be significant and unavoidable.</p>	<p>Less than Significant.</p> <p>As with all development anticipated to occur under the General Plan, the BRHO would result in projects that would generate construction noise and could expose residents to such sources of noise. Construction activities are subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The BRHO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. By-right projects subject to the BRHO would be multi-family residential developments which do not generate significant amounts of noise compared to other types of uses. Traffic associated with development under the BRHO would be within the assumptions made and analyzed in the General Plan Update EIR. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Exposure of persons to or generation of excessive groundborne vibration or noise levels	<p>Significant and Unavoidable.</p> <p>The General Plan Update EIR found that due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts would be significant and unavoidable.</p>	<p>Less than Significant with Mitigation.</p> <p>The BRHO is not anticipated to result in significant generation of, groundborne vibration or groundborne noise levels in excess of County standards. By-right project subject to the BRHO are multi-family residential projects. The BRHO would not include the development of industrial land uses typical of excessive groundborne vibration or groundborne noise levels. However, construction of projects subject of the BRHO may result in short-term ground-borne vibration or groundborne noise levels and would be required to implement Mitigation Measure N-4, consistent with the General Plan Update. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Permanent increase in ambient noise levels	<p>Significant and Unavoidable.</p> <p>Anticipated development under the General Plan would result in an increase in traffic on local roadways in Los Angeles County, which would substantially increase the existing ambient noise environment.</p>	<p>Less than Significant with Mitigation.</p> <p>Projects developed under the BRHO would generate traffic that could contribute to elevated noise levels from mobile sources along roadways. To the extent that projects exacerbate impacts such impacts would be considered significant. However, most projects would result in a less than significant contribution to traffic and therefore noise. Projects would be required to implement Mitigation Measure N-2 and are required to achieve interior noise limits. The BRHO would not</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Temporary or periodic increase in ambient noise levels	<p>Significant and Unavoidable. Construction activities associated with any individual development may occur near noise-sensitive receptors and, depending on the project type noise, disturbances may occur for prolonged periods of time. Mitigation Measure N-1 would reduce impacts associated with construction activities to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses and potential longevity of construction activities, impacts construction noise would be significant and unavoidable.</p>	<p>substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p> <p>Less than Significant with Mitigation. Projects within BRHO areas would be subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The BRHO does not provide incentives for industrial uses, which tend to generate the most significant noise impacts. Additionally, the projects would be required to implement the General Plan's Mitigation Measure N-1, which would reduce impacts associated with construction activities to the extent feasible. Existing noise levels on sites where projects are most likely to occur is anticipated to be generally urban and in proximity to transit. Noise impacts would be temporary and typical for construction activity, which is allowable in urban areas and therefore reasonably anticipated to occur. In addition, all stationary equipment (primarily anticipated to be HVAC equipment) would be required to comply with county regulations to ensure noise levels do not exceed ambient noise level standards. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Proximity to public or private airport	<p>Less than Significant. The General Plan Update EIR explains that development required to be consistent with any applicable Airport Land Use Compatibility Plan (ALUCP) constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that development would not conflict with airport land use plans. Therefore, future development under the General Plan would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels (and would not exacerbate existing impacts).</p>	<p>Less than Significant. Development under the General Plan, including under the BRHO would be required to comply with applicable regulations including General Plan policies in the Land Use Element and Noise Element that ensure that development would not conflict with airport land use plans. Further, the locational criteria in the BRHO for permit streamlining would require that by-right projects subject to the BRHO be outside of the 70 or above decibel Community Noise Equivalent Level (dB CNEL) noise contour of an airport influence area, as depicted in the Los Angeles County General Plan, in its entirety. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Population and Housing		
Induce population growth.	Less than Significant with Mitigation. Under the General Plan, the Antelope Valley Planning Area would result in a large increase in housing. This would be considered a significant impact without mitigation. Mitigation Measure PH-1 would reduce potential impacts to population and housing to a level that is less than significant.	Less than Significant. The BRHO encourages development of additional housing units and is one strategy proposed by the County to meet its RHNA. However, due to the limited nature of where the BRHO's permit streamlining provisions would apply, it is not anticipated to result in a substantial increase in population, and the effects of the BRHO on its own would be within the assumptions of the General Plan Update. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Displace housing or people.	Less than Significant. The General Plan Update EIR concluded that existing uses would continue even where new zoning and land use designations are proposed. None of the existing uses would be forced to be removed or relocated as a result of the project implementation. Compliance with the Housing Element would facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate the RHNA and maintain an inventory of housing opportunities sites. Therefore, the General Plan Update EIR found no significant impacts.	Less than Significant. The BRHO is unlikely to result in the displacement of substantial numbers of existing housing units, either market rate or affordable. The purpose of the BRHO is to increase housing supply in the County. Additionally, by-right multi-family residential projects developed under the BRHO will most likely be on parcels that are zoned commercial with existing non-residential uses, therefore these projects will likely not displace existing housing or residents. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Public Services		
Impact to environment based on new government facilities such as fire/emergency stations, police stations, and schools	Less than Significant with Mitigation. To maintain or achieve acceptable service ratios for fire and law enforcement, Mitigation Measures PS-1, PS-2, PS-3, PS-4 would reduce impacts to a less than significant level.	Less than Significant with Mitigation. Projects subject to the BRHO are not expected to increase population beyond what is already anticipated under the General Plan. For Fire Protection specifically, the ministerial site plan review process provided by the BRHO for by-right multi-family residential projects would not apply to development within Very High Fire Hazard Severity Zones (VHFHSZ). Implementation of Mitigation Measures PS-1, PS-2, PS-3, and PS-4 would reduce impacts to a less than significant level.
Recreation		
Substantial physical deterioration of recreational facilities.	Less than Significant. The General Plan Update EIR indicates that forecast development would generate additional residents that would increase the use of existing parks and recreational facilities such that substantial physical deterioration may occur or be accelerated. According to the General Plan Parks and Recreation Element, the unincorporated areas face a deficit in local parkland of over 3,719 acres, and nine of the 11 Planning Areas have deficits in regional parkland.	Less than Significant. The BRHO would not induce population growth within the County; rather it would serve the existing residents by adding units to the housing stock and streamlining the permit review process for multi-family housing. All new development would continue to be subject to local policies and guidelines regarding the provision of parks and recreation facilities. Therefore, the BRHO would not increase the use of existing neighborhood and regional parks and recreational facilities such that substantial physical deterioration would be

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	The Department of Parks and Recreation's Parks Needs Assessment, completed in 2016, inventories existing park resources, quantifies the need for additional resources in 188 Los Angeles County sub-areas (cities and unincorporated areas), and estimates the potential cost of meeting that need. Funding from a parcel tax approved in 2016 will be allocated locally according to need by the Regional Parks and Open Space District. Further, the General Plan Update EIR found that policies and programs would assure that funding for parkland acquisition would be proportional to increases in population pursuant to the Quimby Act and that impacts would be less than significant.	substantially exacerbated. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Require construction of recreational facilities that might have an adverse effect on the environment.	Less than Significant. Goals, policies, and actions in the General Plan including the creation of a County Parks and Recreation Master Plan, a trails program, and Parks Sustainability Program would guide the development of future recreational facilities. Existing federal, state, and local regulations would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails pursuant to implementation of the General Plan Update. Furthermore, subsequent environmental review would be required for development of park projects under existing regulations. Consequently, the General Plan Update EIR determined impacts would be less than significant.	Less than Significant. As discussed above, the BRHO would not induce population growth within the County; rather it would serve the existing residents by adding units to the housing stock and streamlining the permit review process for multi-family housing. Projects subject to the BRHO would comply with existing federal, state, and local regulations regarding parks and recreational facilities. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Transportation and Traffic		
Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; Conflict with an applicable congestion management program.	Significant and Unavoidable. The General Plan Update EIR concludes that anticipated development under the General Plan would impact levels of service on the existing roadway system. Mitigation Measures T-1 through T-5 would reduce these impacts; however, the impacted locations are still considered to be significant. Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control (e.g., the County cannot undertake or require improvements outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right-of-way	Significant and Unavoidable. Similar to the General Plan Update, it is not possible to determine exactly where by-right developments pursuant to the BRHO would occur. In general, projects that are subject to the BRHO's permit streamlining provisions would be located in urbanized areas often in close proximity to transit and walkable areas (See Figures 2-3 and 2-4 in the Project Description). Because the applicable areas are spread out throughout the county (as opposed to co-located in one area) traffic effects would be dispersed, the BRHO would not substantially change traffic impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	without Caltrans' approval). Therefore, the General Plan Update EIR determined impacts would be significant and unavoidable.	
Air Traffic.	<p>Less than Significant.</p> <p>The General Plan is not anticipated to result in the development of a new airport within Los Angeles County nor will it introduce new land uses that could prevent safety hazards to air traffic. Furthermore, policies of the General Plan are aimed at improving the compatibility between aviation facilities and their surroundings, encouraging greater multi-modal access to airports and encouraging the development of a decentralized system of major airports. The General Plan EIR found impacts to be less than significant.</p>	<p>Less than Significant.</p> <p>Based on the locational criteria for the ministerial site plan review process provided in the BRHO, qualified projects must be located outside of the 70 or above decibel Community Noise Equivalent Level (dB CNEL) noise contour of an airport influence area, as depicted in the Los Angeles County General Plan, in its entirety; and therefore unlikely to significantly affect flight paths or air travel. Existing FAA regulations and the ALUCPs and are intended to identify and properly address potential airport hazards prior to implementation of specific projects. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.</p>
Design feature.	<p>Less than Significant.</p> <p>The General Plan Update EIR found that there would not be substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The General Plan promotes highways to be built to specific standards that have been set by the County. These include increasing the number of lanes on major highways and other improvements under the Highway Plan. Hazards due to roadway design features will be evaluated on a project-by-project basis. All new highways and upgrades will be planned, designed and built to County standards. The General Plan Update EIR found impacts to be less than significant.</p>	<p>No Impact.</p> <p>By-right development in accordance with the BRHO is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The BRHO would not result in changes being made to the local roadways or impede public access on any public right-of-way. Therefore, implementation of the BRHO would have no impact related to design feature hazards. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impact would occur.</p>
Emergency access.	<p>Less than Significant.</p> <p>The General Plan Update EIR found that development would not result in inadequate emergency access. For projects of sufficient size, discretionary review of emergency access is evaluated on a project-by-project basis. The General Plan Update EIR found that buildout will enhance the capacity of the roadway system by upgrading roadways and intersections when necessary, ensure that the future dedication and acquisitions of roadways are based on projected demand, and implement the construction of paved crossover points through medians for emergency vehicles. Additionally, the General Plan Update EIR found that the General Plan will facilitate the consideration of the needs for emergency</p>	<p>Less than Significant.</p> <p>Development, including that in accordance with the BRHO could temporarily interfere with local and on-site emergency response. While road closures could occur as a result of construction activity, it is not anticipated that such closures would result in substantial delays to service providers. Any lane closures must be approved by the County and they would not be approved if substantial delays could result. Typically, the County requires a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Compliance with access standards, including the Haul Route Monitoring Program would reduce potential impacts on roadways designated as haul routes and emergency response services during construction of individual projects. The BRHO would not substantially change impacts as</p>

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	access in transportation planning. The County will maintain a current evacuation plan, ensure that new development is provided with adequate emergency and/or secondary access, including two points of ingress and egress for most subdivisions, require visible street name signage, and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. The General Plan Update EIR determined impacts to be less than significant.	compared to those identified for the General Plan Update; no new or greater impacts would occur.
Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	Less than Significant. The General Plan Update EIR found that the General Plan would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). The General Plan supports alternative modes of transportation, including walking and bicycling, to reduce total VMT. Additionally, the General Plan establishes several policies to ensure the safety and mobility of pedestrians and bicyclists. The County will provide safe and convenient access to safe transit, bikeways, and walkways, consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems, provide safe pedestrian connections across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations, adopt consistent standards for implementation of Americans with Disabilities Act requirements and in the development review process prioritize direct pedestrian access between building entrances, sidewalks and transit stops. The General Plan EIR determined impacts would be less than significant.	Less than Significant. Development in accordance with the BRHO would be located within residential and commercial zones, as defined in the Project Description. Projects would continue to be consistent with General Plan Update policies. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Utilities and Service Systems		
Wastewater treatment requirements.	Less than Significant. According to the General Plan Update EIR, wastewater generation under the General Plan would not exceed wastewater treatment requirements of any of the four Regional Water Quality Control Boards having jurisdiction in Los Angeles County. General Plan implementation Programs require Department of Regional Planning and the Department of Public Works (DPW) to jointly secure sources of funding and to set priorities for preparing studies to assess infrastructure needs for the 11 Planning Areas. Once funding has been secured and priorities have been set, the	Less than Significant. Development subject to the BRHO's permit streamlining provisions would be well within the expected growth for the County evaluated in the General Plan Update EIR and would not exceed RWQCB standards for treatment of wastewater or wastewater treatment capacity. Additionally, water conservation practices and compliance with best management practices (i.e., low flow toilets and automatic sinks), as well as Title 24 requirements, are likely to reduce wastewater generation. Furthermore, the locational criteria require that projects that are eligible for the ministerial site plan review process must be on parcels that are served by a public sewer system. The BRHO would not

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
	County will prepare a Capital Improvement Plan for each of the 11 Planning Areas. Each Capital Improvement Plan shall include a Waste Management Study and Stormwater System Study. General Plan policies also require the County to support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan encourages development, such as Transit Oriented Districts (TODs). Therefore, the General Plan Update EIR found that policies and required regulations would ensure impacts are less than significant.	substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
New water or wastewater treatment facilities; Determination of capacity.	Less than Significant. The General Plan Update EIR explains that projects are required to pay connection fees to the LACSD, or corresponding types of fees to the City of Los Angeles Bureau of Sanitation, as applicable. Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Antelope Valley and Santa Clarita Valley Planning Areas. The General Plan Update EIR determined there is sufficient wastewater treatment capacity in the remaining Planning Areas and impacts would be less than significant.	Less than Significant. By-right developments subject to the BRHO would be likely to occur in urbanized areas zoned for residential or commercial development and based on the locational criteria for permit streamlining. The size of individual projects is anticipated to be relatively small (although incrementally bigger than they would otherwise have been as a result of the potential for increased use of the existing DBO), resulting in minor impacts to the sewer system in the vicinity of each site. Development in accordance with the BRHO would be required to comply with all applicable County regulations. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.
Water supply.	Significant and Unavoidable. The General Plan Update EIR concludes that adequate water supplies have been identified in the UWMP's for the County for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the General Plan, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. It is uncertain whether the water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035. Mitigation Measures USS-1 through USS-23 would lower these impacts, however the General Plan Update EIR finds that impacts would be significant and unavoidable.	Less than Significant. The BRHO does not increase development beyond what is already anticipated and analyzed in the General Plan Update EIR. It is unlikely to result in projects that would not have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources. By-right developments constructed as a result of the project are likely to be located in infill areas on land previously developed with commercial or residential uses, and based on the locational criteria under the BRHO, projects that are eligible for the ministerial site plan review process must be on parcels that are served by a public water system. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Impact	Level of Significance General Plan Update EIR	Level of Significance BRHO
Impacts to landfills; Comply with applicable regulations regarding solid waste.	Less than Significant. The General Plan Update EIR finds that generation of solid waste would increase as the population increases with buildout of the General Plan. Correspondingly, there would be a need for additional landfill capacity and related support facilities. Both the forecasted net increase in solid waste generation by General Plan buildout and the forecast total solid waste generation in unincorporated County areas at General Plan buildout are well within the total residual per day daily disposal capacity of the nine landfills analyzed in the General Plan Update EIR. The General Plan Update EIR concludes that buildout would not require construction of new or expanded landfills, and impacts are found to be less than significant.	Less than Significant. The BRHO does not increase development beyond what is already anticipated in the General Plan Update EIR. It is unlikely to result in projects that would significantly impact landfill capacity. "By-right" housing developments are likely to be located in areas with existing residential or commercial uses that are already served by existing landfills. Projects that obtain planning and building approvals would be consistent with solid waste regulations. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Development associated with the BRHO would be within the growth assumptions in the General Plan Update EIR. As a result, and as demonstrated in this Addendum and summarized in the table above, all impacts would be less than those analyzed in the General Plan Update.

Because total development subject to the BRHO in the County represents a small component of the anticipated increase in development analyzed in the General Plan Update EIR, impacts would be less than those identified in the General Plan Update EIR. Therefore, as summarized in **Table 1-2** and analyzed in more detail in **Chapter 3.0**, the BRHO would not result in 1) substantial changes that require major revisions to the General Plan Update EIR; 2) substantial changes to circumstances, related to significant effects, that require major revisions to the General Plan Update EIR; 3) new information of substantial importance which was not known and could not have been known at the time to General Plan Update EIR was certified. Therefore, the BRHO would not trigger any of the conditions that require the preparation of a subsequent or supplemental EIR under Guidelines §§ 15162 and 15163, and therefore an Addendum to the General Plan Update EIR is the appropriate CEQA document to address the BRHO.

1.11 INCORPORATION BY REFERENCE

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

- Los Angeles County General Plan Update Final Program Environmental Impact Report, certified October 7, 2015.

- An ordinance amending Title 21 – Subdivisions and Title 22 – Planning and Zoning of the Los Angeles County Code to establish a By Right Housing program in the unincorporated areas of Los Angeles County

The By-Right Housing Ordinance is available on the County's website at:
<http://planning.lacounty.gov/brho>

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

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

2.0 PROJECT DESCRIPTION

2.1 LOS ANGELES COUNTY GENERAL PLAN UPDATE EIR

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

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

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

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

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

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

One major policy change was to encourage more housing. To do this, the General Plan Update included changes to General Plan land use policy maps and zoning maps to encourage high density housing and commercial-residential mixed uses along major commercial corridors within Transit Oriented Districts (TODs). The Mixed Use (MXD) zone was applied to some of the major corridors designated Mixed Use (MU).

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

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

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

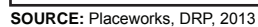
Source: General Plan Update EIR, Table 3-7



SOURCE: Placeworks, 2014; ESRI, 2014

FIGURE 2-1

Regional Vicinity



2.2 BACKGROUND

As identified in the Los Angeles County Affordable Housing Action Plan, the County is confronting a housing crisis.² Residents are experiencing a shortage of 551,807 affordable homes for households earning less than \$41,500 for a four-person household.³ The County's lowest-income renters spend about 70 percent of their income on rent, which leaves only 30 percent of their income for daily essentials such as food, transportation, health expenses, and other needs.⁴

The Regional Housing Needs Assessment (RHNA) is a requirement of State housing law and is a process that determines projected and existing housing need for all jurisdictions (cities and unincorporated areas in counties) in California. The process to determine a RHNA allocation is conducted by a council of governments. The Southern California Association of Governments (SCAG), which includes Los Angeles County, is responsible for updating the RHNA every eight years.

Housing need in the County is expected to continue to rise with projected population growth. Projected County population growth translates into a RHNA for the County's unincorporated areas for the 2014-2021 Housing Element planning period of 27,440 units.⁵ **Table 2-2** shows the breakdown of the RHNA allocation by Area Median Income (AMI) categories. As of the end of 2019, 21,283 units were needed by October 2021 in order to meet housing needs in the unincorporated areas of the County. Given past annual performance, the County is well short of being on-track to meet this number.

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

³ Maxwell, C. (February 24, 2017). New Study Finds Los Angeles County Needs 551,807 Affordable Homes. <https://chpc.net/resources/newsletter-new-study-finds-los-angeles-county-needs-551807-affordable-homes/>

⁴ Los Angeles County Rents in Crisis: A Call for Action, California Housing Partnership Corporation (May 2017) <http://1p08d91kd0c03rlxhmhtydpr.wpengine.netdna-cdn.com/wp-content/uploads/2017/05/Los-Angeles-County-2017.pdf>

⁵ The County's RHNA for the 2014-2021 planning period is 30,145 units, but it has been adjusted to account for annexations that have occurred to date.

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

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

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

Further, the Draft RHNA Allocation for the 2021 through 2029 period for unincorporated areas of Los Angeles County is increasing substantially from past allocations as result of additional quantification of “existing need.” The region as a whole RHNA allocation is increasing by approximately two-thirds. The Draft Allocation for unincorporated Los Angeles County is for an additional approximately 90,000 units.⁶ As shown in **Table 2-2**, the County is not producing enough affordable housing to adequately meet the identified need.

In response to the local and statewide housing crisis, the County is working to increase housing choice, affordability and livability in the unincorporated areas. One piece of the County’s overall plan is the proposed BRHO.

On February 20, 2018, the County Board of Supervisors directed the County Department of Regional Planning (DRP) to prepare the BRHO to allow multi-family residential development by-right in certain zones and circumstances, along with other ordinances to address the affordable housing needs in the unincorporated areas of the County.

⁶ Southern California Association of Governments (SCAG). Estimate of SCAG RHNA Allocation Based on Regional Council Approved Final Methodology. Available at: <http://www.scag.ca.gov/programs/Documents/RHNA/Staff-Recommended-RHNA-Estimated-Allocations-030520.pdf>

2.3 APPROACH TO ANALYSIS

DRP sought State funding assistance with the BRHO, Inclusionary Housing Ordinance (IHO), Interim and Supportive Housing Ordinance (ISHO), and Affordable Housing Preservation Ordinance (AHPO). DRP sought a grant authorized under the Planning Grants Program (PGP) provisions of SB 2 (Chapter 364, Statutes of 2017). For purposes of the grant application and the County's affordable housing projections under these proposed four ordinances, DRP estimated the number of units that the four ordinances together could be expected to provide. Estimates of units were made by category: supportive, affordable, and market rate housing. DRP based their estimate on the previous five years of approved housing permits for each of the categories. As a result, DRP estimated that the number of units would increase by a total of about 92 percent compared to the number of units approved in the years 2014 to 2018, as shown in **Table 2-3** below. However, this estimate of the number of units that could be developed was based on a period of relatively low growth in the County.

In addition to the data reviewed for the grant application, a review of recent housing permit data was conducted to determine the overall development trend in the unincorporated areas over a longer period of time. Development is generally subject to a typical boom and bust cycle (2018-2019 representing a relative boom year), the overall trend in the unincorporated areas has been an increase in the number of permitted units since 2008. **Table 2-4, Housing Permits Approved (2008-2019)**, shows the number of housing permits and units approved from 2008 to 2019.

Table 2-3
Estimated Number of Units Attributable to Four Housing Ordinances

	Baseline Units Approved 2014 to 2018	Anticipated Number of Units after Implementation of Four Housing Ordinances (Over 5- years)	5-Year Increase Attributable to Ordinances	Annual Increase Attributable to Ordinances	Percentage Increase
Supportive	80	480	400	80	500
Affordable	715	1,308	593	118.6	83
Market Rate	1,010	1,675	665	133	66
Total	1,805	3,463	1,658	331.6	92

Note: DRP assumed: 1) the by-right ordinance would increase residential building activity by 50 percent, 2) the IHO would result in 15 percent set-aside on all new residential projects with more than 10 units; 3) there would be greater application of the Density Bonus ordinance, 4) the ISHO would increase supportive housing by 30 percent and 4) the number of supportive units created by motel conversions based on a 20 percent conversion rate of non-corporate and confirmed motels.

Source: SB 2 Planning Grants Program Application, March 28, 2019

Table 2-4
Housing Permits Approved (2008-2019)

Total Housing Permits Approved:	46
Total Number of Units Approved:	2,949
<i>Total Units from Projects with Affordable Housing Set-Aside:</i>	2,168
<i>Extremely Low:</i>	80
<i>Very Low:</i>	677
<i>Lower:</i>	620
<i>Moderate:</i>	19
<i>Market-Rate:</i>	772
<i>Total Units from Projects with Senior Citizen Housing (Market-Rate):</i>	781
<i>Senior:</i>	446
<i>Non-Senior:</i>	335

Source: County of Los Angeles Housing Unit permit data, 2020

Given the increased focus on streamlining housing approvals and accelerating housing production at all levels of government, this CEQA document assumes the BRHO (together with the other three ordinances aimed at increasing affordable housing as addressed in the SB 2 Grant Application discussed above) could result in more units than estimated by DRP in the SB 2 Grant Application. Therefore, this Addendum, rather than basing the analysis on the potential number of units that could be developed based on past trends, follows the approach used in the analysis of the General Plan Update in the General Plan Update EIR. The General Plan Update EIR identifies forecast housing development (post 2035) based on zoning use capacity. The number of housing units analyzed in the General Plan Update EIR far exceeds the number of units forecast by SCAG to occur in the region (in the 2020 Connect SoCal Plan, SCAG forecasts that the unincorporated County will have a total of 419,300 units in 2045, compared to the 659,409 units evaluated in the General Plan Update EIR (a total increase of 358,931 housing units over the General Plan Update existing conditions – see **Table 2-1**).⁷ Thus, the General Plan Update EIR is a conservative analysis of potential development and associated impacts. Total development subject to the BRHO in the County would represent a small component of the total anticipated forecast development analyzed in the General Plan Update EIR.

The recent effects of the COVID-19 pandemic will undoubtedly have at least a short-term dramatic impact on housing demand and production. At the time of this Addendum (May 2020), the County is under a

⁷ SCAG. Connect SoCal: Demographics and Growth Forecast Technical Report. Available at: https://www.connectsocial.org/Documents/Proposed/pfConnectSoCal_Demographics-And-Growth-Forecast.pdf

stay-at-home order and millions of jobs have been at least temporarily lost with associated impacts on housing. However, it would be entirely speculative to try to determine the potential for long-term effects on housing demand and production in the County. Therefore, this Addendum continues to conservatively assume that by 2035 and beyond, housing production will have recovered and (by post 2035) occurred as anticipated in the General Plan Update EIR.

This Addendum provides that the Proposed Project (together with other ordinances aimed at increasing affordable housing, see **Chapter 1.0, Introduction**), would result in some fraction of the forecast development identified and evaluated in the General Plan Update EIR. It is not anticipated that the BRHO would add to the number of units already evaluated in the General Plan Update EIR since the General Plan Update forecast growth is based on capacity, and the BRHO does not change the population forecast or zoning capacity as analyzed in the General Plan Update EIR.

Given the complexity associated with housing development at the present time, the precise number and location of units anticipated to result from each of the housing ordinances (or all of them together) is not possible to forecast with any reasonable approach. Such an exercise would be entirely speculative. Therefore, this Addendum takes a comparative qualitative approach to the analysis of the Proposed Project.

2.4 PROJECT CHARACTERISTICS

The BRHO contains the following major components for the purpose of streamlining housing development:

1. The BRHO streamlines multi-family residential development by allowing by-right development in specified zones subject to locational criteria.
2. The BRHO includes a zone change program to remove the DP (Development Program) combining zone and/or the U (Dwelling Units) suffix on certain residentially or commercially zoned lots.
3. The BRHO clarifies density calculations by establishing that maximum allowable residential density is determined by the General Plan, or an applicable Area, Community or Neighborhood Plan; removing some of the “U” designations; and specifying that fractional numbers are rounded up when calculating density.
4. The BRHO streamlines certain density bonus projects. Currently, specific affordable housing types and requests require a discretionary review unless the project meets certain CEQA exemption criteria. The BRHO will revise the density bonus sliding scale table to remove that criteria to enable those project types and requests to be reviewed by right, subject to the findings for incentives and waivers. The BRHO also revises certain provisions of the Los Angeles County Code for internal consistency,

including removal of discretionary review requirements for some residential and mixed-use developments in certain combining zones and Community Standards Districts (CSDs). In general, streamlined development would be allowed in specified zones subject to the following locational criteria:

- Outside of a Very High Fire Hazard Severity Zone, as defined in Title 32 (Fire Code) of the County Code, in its entirety;
- Outside of a Coastal Zone, as defined in Division 2 (Definition), in its entirety;
- Outside of an SEA, as defined in Division 2 (Definition), in its entirety;
- Outside of an HMA, as depicted in the Los Angeles County General Plan, in its entirety;
- Outside of the 70 or above decibel Community Noise Equivalent Level (dB CNEL) noise contour of an airport influence area, as depicted in the Los Angeles County General Plan, in its entirety;
- Served by a public water system;
- Served by a public sewer system; and
- Fronting a highway or a public street.

The locational criteria would determine which lots would qualify for a streamlined development process. **Figure 2-3, By Right Housing Applicability**, shows the areas which meet the locational criteria and would therefore allow by-right multi-family housing.

2.4.1 Streamline Multi-Family Residential Development

The Project would make amendments to the Los Angeles County Code to streamline multi-family residential development in specified zones. Specifically, the BRHO would amend:

- Title 21 – Subdivisions, to exempt certain developments of up to four dwelling units in two or more residential buildings (i.e. in the form of multiple detached units and/or duplexes) from the discretionary lease project subdivision process if the development is in Zones R-2 or R-3 and meets certain criteria pertaining to lot size and project location; and
- Title 22 – Planning and Zoning, to allow some multi-family residential developments “by-right,” requiring only a Ministerial Site Plan Review (SPR), if the development is in Zone R-2, C-H, C-1, C-2,

C-3, or C-MJ, and to streamline and increase options for joint live and work units and mixed use developments in the commercial zones.

2.4.2 Zone Change Program

The BRHO would also include a zone change program to remove the ()-DP (Development Program) combining zone and/or the U (Dwelling Units) suffix on certain residentially or commercially zoned lots.

- The ()-DP combining zone was established to provide a zone in which development occurring after a lot has been rezoned would conform to plans and exhibits submitted by the applicant in instances where such plans and exhibits constitute a critical factor in the decision to rezone. Adherence to such developmental plans is assured by requiring a Conditional Use Permit (CUP) for all future developments on the lot. As part of the BRHO, lots that are vacant or currently developed with a residential use and that meet the locational criteria mentioned above are proposed to be rezoned in order to remove the ()-DP combining zone, so that future residential developments would not be subject to a CUP.
- The U suffix to a zoning symbol indicates the maximum allowable density in terms of units per net acre. As part of the BRHO, certain lots that meet the locational criteria mentioned above are proposed to be rezoned in order to remove the U suffix, since the density indicated by the U suffix may not be consistent with the maximum allowable density in the General Plan, or an applicable Area, Community, or Neighborhood Plan.

Below is a detailed description of the zone change methodology:

Removal of ()-DP Zone

In general, the removal of the ()-DP combining zone is proposed on parcels that meet all locational criteria mentioned above, with the following exceptions:

- In some master plan greenfield developments, some lots may meet all locational criteria. However, rezoning is not proposed on these lots if the original parcel of the larger master plan subdivision does not meet all locational criteria (i.e., where other portions of the larger subdivision are within an HMA);
- In some existing urban or suburban communities, rezoning is proposed on scattered lots that meet all but one locational criteria (i.e., lots are within an HMA) if such lots are developed with existing residential uses, and the surrounding area in general meet all locational criteria; and

- In some existing urban or suburban communities, rezoning is proposed on lots that do not front a public street but meet all other locational criteria, if the lots are part of a larger geographic area zoned for multi-family residential uses and served by public streets.

For lots that meet all locational criteria, other factors such as existing land uses and ownership are also considered:

- The removal of the ()-DP combining zone is proposed on lots that are:
 - Developed with existing residential uses;
 - Vacant and zoned for residential uses, including commercial zones; or
 - Government-owned.
- The removal of the ()-DP combining zone is not proposed on lots that are:
 - Developed with existing non-residential uses even if the lots meet all locational criteria. Per the draft ordinance provisions, future residential developments on these lots will be subject to the same permit and review requirements of the base zone, meaning future multi-family residential projects would not be subject to a CUP since these lots meet the locational criteria; or
 - Adjacent to a freeway.

Removal of U Suffix

Similar to the removal of the ()-DP combining zone, the removal of the U suffix is proposed on parcels that meet all locational criteria mentioned above, with the following exceptions:

- In some master plan greenfield developments, some lots may meet all locational criteria. However, rezoning is not proposed on these lots if the original parcel of the larger master plan subdivision does not meet all locational criteria (i.e. where other portions of the larger subdivision are within an HMA);
- In some existing urban or suburban communities, rezoning is proposed on scattered lots that meet all but one locational criteria (i.e., lots are within an HMA) if such lots are developed with existing residential uses, and the surrounding area in general meets all locational criteria; and
- In some existing urban or suburban communities, rezoning is proposed on lots that do not front a public street but meet all other locational criteria, if the lots are part of a larger geographic area zoned for multi-family residential uses and served by public streets.

For lots that meet all locational criteria, other factors such as existing land uses and ownership are also considered:

- The removal of the U suffix is proposed on lots that are:
 - Developed with existing residential uses;
 - Vacant and zoned for residential uses;
 - Developed with existing institutional uses, such as schools and churches, and zoned for residential uses; or
 - Government-owned.
- The removal of the U suffix is not proposed on lots that are adjacent to a freeway.

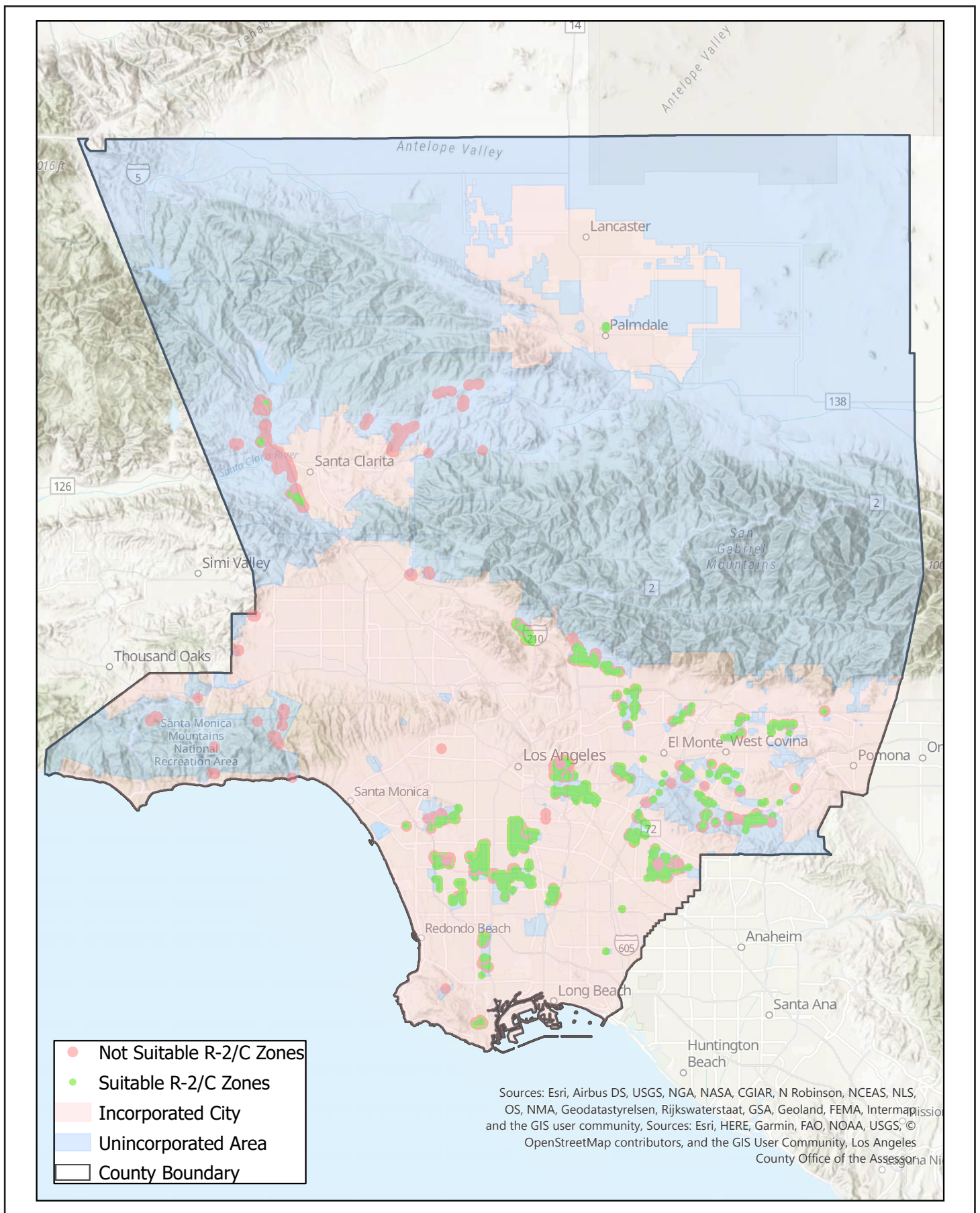
Figure 2-4, Proposed Zone Changes, shows the locations where the BRHO would remove the DP and U designations.

Density Calculation Clarifications

The BRHO clarifies that, except as specified in Title 22, all proposed densities, exclusive of density bonus units, shall fit within the range of density specified by the land use designation in the General Plan, or applicable Area, Community, or Neighborhood Plan. The BRHO further clarifies that the maximum density specified by the land use designation in the respective Plan must be used to calculate the maximum number of units permitted on a lot, exclusive of units permitted by a density bonus. With the exception of the “U” suffix to a zoning symbol, the BRHO removes any references to “required area per dwelling unit” or “units per net acre” in Title 22 for consistency purposes. Furthermore, the BRHO changes the rules for measurement of density calculations to be rounded up to the nearest whole number, as opposed to rounding down.

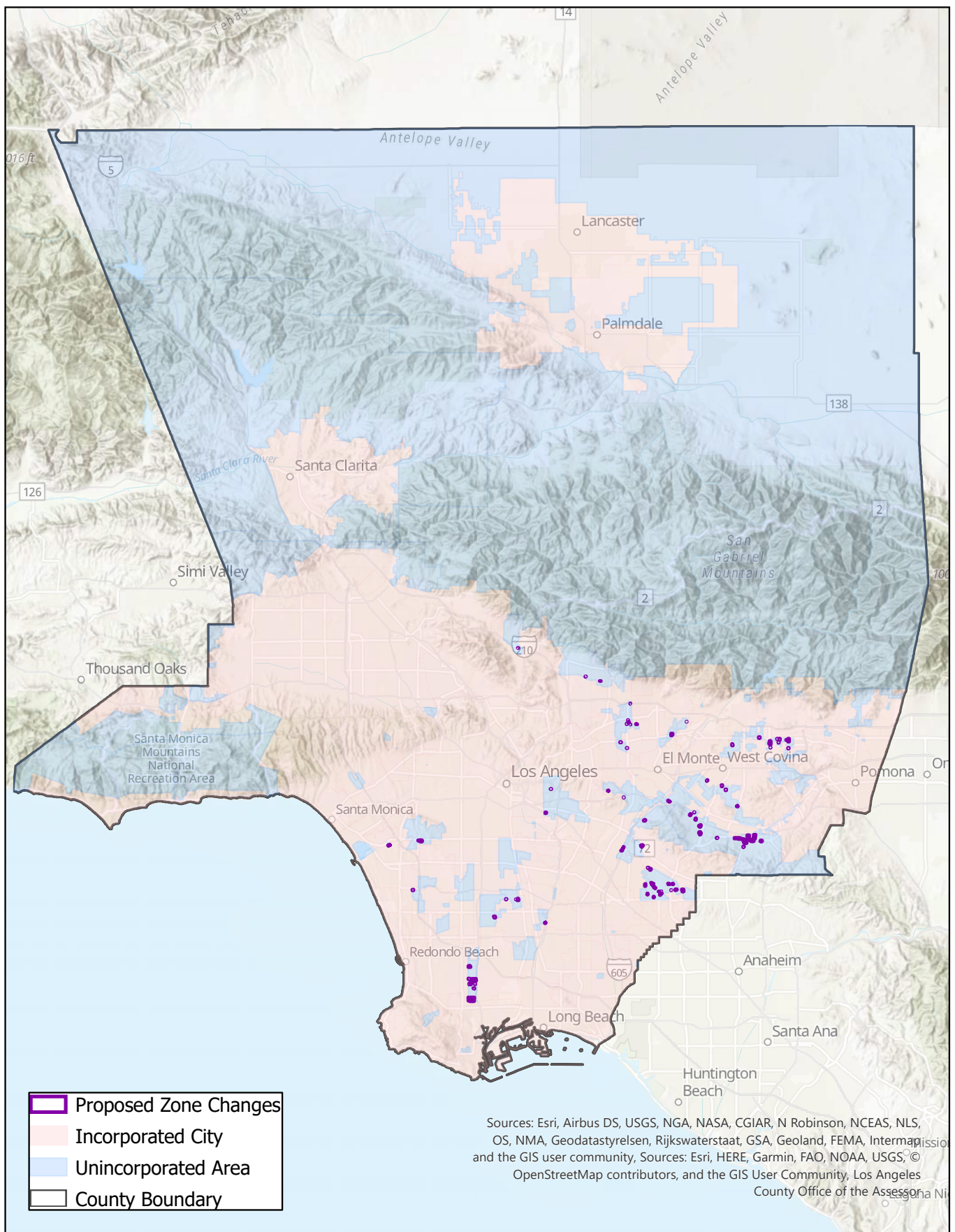
Density Bonus Streamlining

Existing code requires developments that set aside units for extremely low income households, rental developments with a moderate income set-aside, single-family developments with a moderate income set-aside, and developments requesting more than 35 percent density bonus to meet certain CEQA exemption criteria to be eligible for by-right review. The BRHO will remove that criteria to enable those project types and requests to be reviewed by right, subject to the findings for incentives and waivers.



SOURCE: Esri et al., 2020

FIGURE 2-3



SOURCE: Esri et al., 2020

FIGURE 2-4

Proposed Zone Changes

2.5 PROJECT OBJECTIVE

The objective of the BRHO is to further goals of the General Plan, such as supporting a reasonable share of projected regional population growth, by streamlining the permitting of housing developments by allowing by-right development in specified zones subject to locational criteria, and by clarifying how allowable density should be calculated.

2.6 DISCRETIONARY ACTIONS AND APPROVALS

The following actions by the County will be required in order to implement the BRHO:

- Approval of this By-Right Housing Ordinance Addendum
- Adoption of the Proposed By-Right Housing Ordinance to amend County Code Sections (21.08.080, 21.08.090, 22.02.050, 22.04.050, 22.06.020, 22.14.010, 22.18.030, 22.18.060, 22.20.030, 22.20.040, 22.20.050, 22.24.030, 22.26.030, 22.52.030, 22.58.010, 22.58.030, 22.58.040, Appendix I of Chapter 22.104, Section headings for Chapter 22.110, 22.110.120, 22.110.130, 22.110.140, 22.110.150, 22.120.050, 22.120.080, 22.120.090, 22.120.100, 22.140.170, 22.140.230, 22.140.320, 22.140.350, 22.140.360, 22.140.370, 22.140.600, 22.172.020, 22.346.070, 22.348.080, Figure 22.348-A, Figure 22.348-C, 22.350.070, 22.352.070,)

3.0 ENVIRONMENTAL ANALYSIS

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

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

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

3.1 AESTHETICS

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The BRHO facilitates and streamlines multi-family residential developments by allowing them by-right in specified zones of unincorporated areas of the County subject to locational criteria. Specifically, the BRHO would remove the existing Conditional Use Permits (CUP) required for various multi-family housing types in Zones R-2, C-1, C-2, C-3, C-MJ, ()-DP, and ()-CRS, and would require a Ministerial Site Plan Review (SPR) instead, subject to the locational criteria as specified in the ordinance. Also, the BRHO would exempt the certain lease project developments, of a maximum of four dwelling units in two or more residential buildings (i.e. in the form of multiple single-family residences and/or duplexes), from the lease project subdivision process if the development is in Zones R-2 or R-3 and meets certain criteria pertaining to lot size and project location. Since these zones are already designated for residential and commercial use and are already generally urban in nature, it is anticipated that the BRHO would likely result in development in already urbanized areas and therefore would not result in substantial development that would impact scenic vistas, including views along a scenic highway or scenic corridor. The BRHO would not change the

location where development would occur, nor would it increase development beyond that evaluated in the General Plan Update EIR. While the BRHO may result in additional housing in areas not primarily zoned for multi-family housing, such as in commercial zones, or where the zone would previously require a CUP, such zones are in already urbanized areas of the County where residential development is generally planned for. Furthermore, the locational criteria in the BRHO requires that a by-right development be outside the Coastal Zone (CZ), Significant Ecological Areas (SEAs), or Hillside Management Areas (HMAs), which are areas that are more likely to include scenic vistas.

Removal of the “U” suffix for certain lots that meet the locational criteria would continue to be consistent with the maximum allowable density in the General Plan. The increase from rounding up, instead of down, may slightly increase the number of housing units but the total housing units would still be within the allowable General Plan density.

To the extent that the BRHO would facilitate development, it is anticipated that such development would be consistent with the General Plan Update and would not be beyond the growth that is already evaluated in the General Plan Update EIR. As with development anticipated under the General Plan Update, some impingements of views of scenic resources could occur, but overall impacts are anticipated to be less than significant. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The General Plan Update EIR concluded that no development or changes would occur along or near any of the four adopted state scenic highways within the unincorporated areas. The General Plan Update EIR

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

As discussed above, the BRHO streamlines multi-family residential developments, by allowing them by-right in specified zones in the unincorporated area of the County. Specifically, the BRHO would remove the existing Conditional Use Permits (CUP) required for various multi-family housing types in Zones R-2, C-1, C-2, C-3, C-MJ, ()-DP, and ()-CRS, and would require a Ministerial Site Plan Review (SPR) instead, subject to the locational criteria that exclude resource and hazard areas. Also, the BRHO would exempt certain lease project developments, of a maximum of four dwelling units in two or more residential buildings (i.e. in the form of multiple single-family residences and/or duplexes), from the lease project subdivision process if the development is in Zones R-2 or R-3 and meets certain criteria pertaining to lot size and project location that exclude resource and hazard areas. While the BRHO would facilitate multi-family housing, all development would be within the assumptions analyzed within the General Plan Update EIR.

The BRHO would not allow by-right multi-family housing in the Very High Fire Hazard Severity Zones (VHFHSZ), SEAs, HMAs, or the Coastal Zone (CZ). These areas are generally zoned for low density single-family development, where the BRHO does not apply.

Removal of the "U" suffix for certain lots that meet the locational criteria would continue to be consistent with the maximum allowable density in the General Plan. The increase from rounding up, instead of down, may slightly increase the number of housing units but the total housing units would still be within the allowable General Plan density.

The four scenic highways listed above would not be impacted beyond what was already evaluated in the General Plan Update EIR. Impacts under the BRHO to other eligible scenic highways would be less than those anticipated for the General Plan Update because individual projects are anticipated to be developed

within urbanized areas and not in locations where any of these routes could be impacted. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

As discussed above, the BRHO facilitates and streamlines multi-family residential developments by allowing them by-right in specified zones subject to locational criteria. Specifically, the BRHO would remove the existing Conditional Use Permits (CUP) required for various multi-family housing types in Zones R-2, C-1, C-2, C-3, C-MJ, ()-DP, and ()-CRS, and would require a Ministerial Site Plan Review (SPR) instead, subject to the locational criteria that exclude resource and hazard areas. Also, the BRHO would

exempt certain lease project developments of a maximum of four dwelling units in two or more residential buildings (i.e. in the form of multiple single-family residences and/or duplexes) from the lease project subdivision process if the development is in Zones R-2 or R-3 and meets certain criteria pertaining to lot size and project location that exclude resource and hazard areas.. The BRHO also clarifies how to determine the allowable density by deferring to the General Plan, and includes a zone change program to remove the U suffix to the zoning symbol in some areas since, as specified in the ordinance, allowable density in general should be dictated by the General Plan. While the BRHO could result in more housing in these “by-right” areas than is currently allowed, it would not allow more than is allowed by the underlying zone or the land use designation and therefore the BRHO would not increase development above that analyzed in the General Plan Update EIR.

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO only modifies specified zones. Specifically, the BRHO would remove the existing Conditional Use Permits (CUP) required for various multi-family housing types in Zones R-2, C-1, C-2, C-3, C-MJ, ()-DP, and ()-CRS, and would require a Ministerial Site Plan Review (SPR) instead, subject to the locational criteria. Also, the BRHO would exempt a lease project development of a maximum of four dwelling units in two or more residential buildings (i.e. in the form of multiple single-family residences and/or duplexes), from the lease project subdivision process if the development is in Zones R-2 or R-3 and meets certain criteria pertaining to lot size and project location. The BRHO also clarifies how to determine the allowable density by deferring to the General Plan, and includes a zone change program to remove the U suffix to the zoning symbol in some areas since, as specified in the ordinance, allowable density in general should be dictated by the General Plan.

Individual projects could introduce new lighting sources when located near industrial, warehouse, residential, commercial, and mixed-use land uses. However, individual projects developed in accordance with the BRHO are anticipated to occur where development already occurs and where existing lighting is typical of urban uses. The County's Dark Skies Ordinance protects areas in the Antelope, Santa Clarita and San Fernando valleys and the Santa Monica Mountains North Area from light pollution by requiring measures, such as directing lighting towards the ground. Development of individual projects that are subject to the BRHO would be subject to County requirements that regulate spillover lighting including the Rural Outdoor Lighting Ordinance, which applies to rural areas throughout Los Angeles County. Additionally, the California Building Code (CBC) contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulation light power and brightness, shielding, and sensor controls. Individual projects would be required to comply with County requirements addressing spillover light and glare, and projects would generally be limited to urbanized areas. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

While not specifically addressed by CEQA, the General Plan Update EIR evaluated shade and shadow impacts specifically related to the Antelope Valley Planning Area where the General Plan anticipates development to occur. However, these projects would be in urban areas that would not be substantially affected by these incremental increases in shade/shadow. It is not anticipated that the BRHO would substantially change impacts as compared to those identified for the General Plan Update EIR; no new or greater impacts would occur.

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the Agricultural Resource Area (ARA) policies under the General Plan would reduce both direct and indirect impacts of conversion of mapped Important Farmland. However, these ARAs would not be agricultural preserves and some conversion to non-agricultural uses would be permitted. As such, impacts anticipated to result from development under the General Plan Update were identified as significant in the Antelope Valley Planning Area and Santa Monica Mountains Planning Area. As most of Los Angeles County is 1) urbanized, 2) mountainous terrain unsuitable for intensive commercial agriculture, or 3) land with other constraints that make commercial agriculture infeasible (such as lack of water supply or soil suitability), use of offsite preservation as a mitigation measure would require acquisition of land outside of Los Angeles County and therefore was considered infeasible. Impacts in the remaining nine Planning Areas were identified as less than significant.

The BRHO's by-right streamlining provisions, zone changes, and clarifications do not apply in agricultural zones. Therefore, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that implementation of the zoning changes within the General Plan would not involve any rezoning of farmland and impacts regarding conversion of farmland to non-agricultural uses would be less than significant. Furthermore, the General Plan Update EIR identified that

the only Williamson Act contracts in effect in Los Angeles County are located on Santa Catalina Island, of which there is no Important Farmland mapped. No impact to Williamson Act contracts would occur according to the General Plan Update EIR.

The BRHO will streamline certain multi-family residential developments by allowing them “by-right” in certain zones. These zones, as discussed above, apply to certain existing residential and commercial zones. Agricultural zoning would not be affected by the BRHO’s by-right streamlining provisions and associated zone changes. Therefore, impacts to Williamson Act contracts as a result of the development in accordance with the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

As described above, the BRHO will only apply to specified zones as identified by the ordinance. These zones, as discussed above, consist of residential and commercial zones. Therefore, the BRHO’s by-right streamlining provisions and associated zone changes would not apply to existing zoning for forest land. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Forests in the County are largely limited to mountain ranges in three of the eleven Planning Areas: Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains. Small areas of forest are also found at the northern edge of the East San Gabriel Valley and West San Gabriel Valley Planning Areas. The largest concentration of forest is in the Angeles National Forest, which covers 25 percent of the land area of the County. Despite the large extent of the Angeles National Forest, very little of its area contains forests or woodlands as defined by the California Public Resources Code. Most of the land area in the Angeles National Forest is chaparral or similar scrub communities. Forests in the County are limited to narrow formations along creeks and other watercourses and the highest elevations of the San Gabriel Mountains. The General Plan Update EIR indicates that Forest land within Los Angeles County is protected through the County's Significant Ecological Area (SEA) Ordinance. As part of the General Plan, the County completed minor updates to the SEA designations and policies, including minor changes to the policies, boundaries and technical descriptions of the County's SEAs. The General Plan Update EIR concluded that compliance with the SEA Ordinance would reduce potential impacts to forest land to a less than significant level.

The Angeles National Forest and Los Padres National Forest lie within the unincorporated areas of Los Angeles County and are managed by the U.S. Forest Service. The County also includes small areas of forest outside of the National Forests. These consist primarily of small areas in the Santa Monica Mountains, Sierra Pelona Mountains, and areas of the San Gabriel Mountains adjacent to the Angeles National Forest. These forest areas are zoned for watershed, open space, agriculture and a limited amount of low-density residential and rural commercial development. Projects under the BRHO will be multi-family homes and construction of such projects in rural areas is unlikely due to existing zoning and lot size. The BRHO would facilitate multi-family development by including modifications to the specified zones that would allow multifamily development to occur by right. Further, the locational criteria included in the BRHO for permit streamlining require that development be located outside SEAs. As discussed above, the locations where the ordinance would apply are currently zoned for residential or commercial development within the unincorporated portions of the County. Therefore, these areas are planned for development, and impacts related to the loss of forest land would remain less than significant. The BRHO would not substantially

change impacts as compared to those identified for the General Plan Update; no new or greater impact would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR, due to agricultural uses being incompatible with some other land uses, concluded that development anticipated to occur under the General Plan Update could lead to new nonagricultural uses that develop around existing agricultural uses, which would create pressure for them to be converted to nonagricultural uses. Implementation of Agricultural Resource Area (ARA) policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to incompatible non-agricultural uses. However, ARAs are not agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. The General Plan Update EIR found that in the Antelope Valley Planning Area and Santa Clarita Valley Planning Area there would be a significant indirect impact on conversion of mapped Important Farmland to nonagricultural use due to pressure to convert farmland to non-agricultural uses and related incompatibilities between agricultural and urban uses. The General Plan Update EIR indicated that there are no feasible mitigation measures to reduce impacts to farmland in these areas. The General Plan Update EIR found that impacts would be less than significant in the nine other Planning Areas.

The BRHO's permit streamlining provisions in Titles 21 and 22 would only apply collectively to residential zones R-2 and R-3; commercial zones C-1, C-2, C-3, and C-MJ; and the combining zones ()-DP and ()-CRS and not in any agricultural zones. Therefore, BRHO would not result in development that would result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Forests and farmland in the County are relatively isolated from urban areas. Development under the BRHO is likely to occur in urbanized areas of the County as the BRHO only applies within the zones specified above. Therefore, forests and farmlands would not be significantly impacted. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.3 AIR QUALITY

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that the Antelope Valley Air Quality Management District (AVAQMD) and the South Coast Air Quality Management District (SCAQMD) consider a project consistent with the air quality management plan (AQMP) if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, vehicle trips, or vehicle miles traveled (VMT) are deemed to not exceed this threshold. The General Plan Update EIR concludes that individual development projects would be consistent with the control measures and regulations identified in the SCAQMD and AVAQMD's AQMPs. However, the General Plan Update EIR found that development would not be consistent with the AQMPs because the anticipated development in the unincorporated areas would exceed forecasts in the AQMPs. In order to present a conservative analysis, the General Plan Update EIR evaluated development based on a percentage of capacity and not based on the population forecast provided by the Southern California Association of Governments (SCAG). SCAG identifies and evaluates regional population and anticipated development in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) every four years; the SCAG forecast is carried in to the relevant AQMPs. As such, the impact of development under the General Plan Update was found to be significant and unavoidable.

The BRHO will facilitate and streamline multi-family residential developments by allowing them "by-right" in specified zones. These zones, as described above, include existing residential and commercial zones. The BRHO would not increase the growth and development beyond what is anticipated from development under the General Plan Update. Since the release of the General Plan Update EIR, the SCAQMD adopted an updated AQMP in 2017 that incorporates SCAG's updated population projection numbers from the 2016/2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that would account for the SCAG forecast population increase in the County; anticipated development under the General Plan Update continues to exceed 2016/2040 and current (2020 Connect SoCal) SCAG forecasts. The AVAQMD's Ozone Attainment Plan has not been updated and anticipated development under the General Plan Update could continue to exceed the AVAQMD's plan. Impacts under the BRHO would not be greater than those evaluated in the General Plan EIR.

The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur. The General Plan EIR found impacts would be significant and unavoidable.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The General Plan Update EIR concludes that construction emissions must be addressed on a project-by-project basis and that for a broad-based General Plan Update, it is not possible to determine whether the scale and phasing of individual projects could result in the exceedance of the SCAQMD's or the AVAQMD's short-term regional or localized construction emissions thresholds. **Mitigation Measure AQ-1** (construction equipment and procedures), regulatory measures, as well as goals and policies in the General Plan Update would reduce air pollutant emissions. However, due to the likely scale and extent of construction activities pursuant to the future development that would be accommodated by the General Plan Update, at least some projects would likely continue to exceed the SCAQMD and AVAQMD

thresholds. Therefore, the General Plan Update EIR determined construction- and operation-related air quality impacts development under the General Plan Update would be significant and unavoidable.

Under the BRHO individual projects have the potential to violate air quality standards or contribute substantially to an air quality violation. While overall total emissions in the future are expected to be less than today (as a result of emissions controls), there is the potential for violations of standards adjacent to individual construction sites and individual industrial uses. As with development under the General Plan Update, it is not possible to determine the scale or phasing of individual projects. An evaluation of the construction emissions would be undertaken on a project-by project basis.

As noted above, the BRHO may result in an increase in multi-family residential projects in the specified zones. As under the General Plan Update, construction of multiple projects simultaneously could result in total daily construction emissions exceeding regional thresholds and therefore emissions associated with construction could be significant. Such emissions would be within the assumptions identified in the General Plan EIR. As indicated in the General Plan Update EIR, the risk posed from Valley Fever would be reduced to less than significant levels with the implementation of the SCAQMD or AVAQMD's fugitive dust measures. However, even with the implementation of **Mitigation Measure AQ-1**, regulatory measures, as well as general plan goals and policies, it is likely that some projects would exceed the relevant SCAQMD and AVAQMD criteria air pollutant thresholds, as described above, these impacts were fully disclosed within the General Plan Update EIR and no new or greater impacts would occur.

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

The BRHO would not substantially change construction or operational air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO would not increase the growth and development beyond what is anticipated from development evaluated in the General Plan Update EIR. Development related to the BRHO would likely be within urbanized areas and would incentivize transit and active transportation. While the BRHO could incentivize the development of housing projects, overall, it is not anticipated to result in development greater than the growth assumptions in the General Plan Update. As a result, the cumulative air quality emissions associated with the BRHO are already evaluated in the General Plan Update EIR. The BRHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

As discussed above, the BRHO would not increase the growth and development beyond what is anticipated in the General Plan Update EIR nor would the ordinance change the location in which development would occur. The BRHO is designed to increase the availability of housing within the County; the Ordinance is only applicable to multi-family projects in specified zones. As a result, the Ordinance

would not generate new sources of mobile or stationary-source TAC emissions typically associated with industrial or commercial processes.

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project, as well as other impacted individuals. Nonetheless, **Mitigation Measure AQ-3** requires projects that will cite new sensitive receptors within a certain distance of land uses associated with high levels of TAC emissions to prepare a health risk assessment and, if necessary, apply additional on-site mitigation. The BRHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO is only applicable to multi-family residential projects in the specified zones as defined within the ordinance. Therefore, the BRHO would not encourage the development of industrial land uses that could create objectionable odors. Residential use is not associated with odor nuisance and therefore this impact is less than significant. The BRHO would not substantially change cumulative air quality impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.4 BIOLOGICAL RESOURCES

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The BRHO would not make changes to any SEA designations or policies. The BRHO's permit streamlining provisions would only apply to specified residential and commercial zones; locational criteria in the BRHO also requires that any by-right developments under the ordinance be situated outside of any SEA, HMA, or the CZ. Therefore, the areas impacted by the BRHO's permit streamlining provisions would likely occur

within urban areas. Generally, these areas provide little, if any, biological resources in the form of habitat, species or plant communities therefore, threatened, endangered, protected and sensitive species, and habitats, are not anticipated to be affected.

Mitigation Measures BIO-1 and BIO-2 would remain in effect to mitigate potential direct impacts to a less than significant level. However, indirect impacts would remain significant and unavoidable, as was determined in the General Plan Update EIR. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The locational criteria require by-right projects developed under the BRHO be outside many of the areas with the most sensitive natural communities such as SEAs, HMAs, and the coastal zone. Further, **Mitigation Measure BIO-1** and **BIO-3** would remain in effect to reduce potential impacts to a less than significant level.

The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or expanded impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that anticipated development under the General Plan Update could impact wetland areas and these impacts may have a significant adverse effect on wetlands through hydromodification, filling, diversion or change in water quality. **Mitigation Measure BIO-1** would ensure that, on a project-specific level, necessary surveys are conducted, and a biological resources assessment is prepared to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. In addition, for wetlands under the jurisdiction of the USACE, CDFW, and/or RWQCB, as well as waters and riparian habitat under their respective jurisdictions, permits and mitigation may be required, subject to the approval of the regulatory agencies. Furthermore, project locations with plant communities considered sensitive by the CDFW must be analyzed under CEQA. The General Plan EIR found impacts with implementation of these mitigation measures in combination with the requirements for regulatory permitting (e.g., Section 404 permitting and any associated mitigation requirements), impacts to wetlands would be considered less than significant.

The BRHO's permit streamlining provisions would only apply collectively to residential zones R-2 and R-3; commercial zones C-1, C-2, C-3, and C-MJ; and the combining zones ()-DP and ()-CRS. While the BRHO could increase the number of multi-family residential projects by streamlining the permit review process and changing the allowable density by clarifying that fractional numbers shall be rounded up when calculating densities, the BRHO would not increase the overall growth and development beyond what is anticipated in the General Plan Update EIR, nor would the ordinance change the location of planned development. The County contains areas with coastal wetlands, drainages, marshes and vernal pools. Any

impacts related to implementation of the BRHO to these areas has already been evaluated by the General Plan Update EIR.

Impacts to federally or state protected wetlands and waters of the United States would be limited for development due to the fact that these areas have building requirements and discretionary permit review processes designed to protect the most sensitive marshes, vernal pools, coastal wetlands, and drainages. Since the most sensitive of these resources are protected in the General Plan Update, the impacts of the ordinance would be less than what was disclosed in the General Plan Update EIR.

For waterways in the County that are not located in special management areas, the General Plan Update includes policies to preserve wetlands and streambeds. In addition, state and federal agencies are involved in the review and permitting of projects in these areas when necessary. Further, the locational criteria in the BRHO require that by-right projects developed under the BRHO be outside the areas most likely to include wetlands, such as SEAs, HMAs, and the coastal zone. Therefore, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Policies within the General Plan Update, including updates to the SEA Ordinance, have both direct and indirect beneficial effects protecting regional wildlife linkages and facilitating wildlife movement by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas. However, the General Plan Update EIR indicated that anticipated development under the General Plan Update could impact regional wildlife linkages and nursery sites, constituting a potentially significant

adverse effect on wildlife movement and nursery sites. **Mitigation Measure BIO-1** and the update to the SEA Ordinance may provide some protection to avoid or minimize impacts to wildlife corridors and nursery sites; however, for those projects where avoidance or minimization of impacts is infeasible, the policies proposed in the General Plan Update do not provide for mitigation for loss of wildlife movement opportunities or nursery sites. If development impacts regional wildlife linkages and impedes wildlife movement, connectivity will be lost on a regional scale in these vital landscape corridors and linkages. Thus, the General Plan Update EIR found impacts would be significant and unavoidable.

Many of the areas that are identified as wildlife linkages or that serve as important habitat and/or connections between habitat and wildlife migratory routes, are zoned for watershed, open space, agriculture and a limited amount of low-density residential development. The BRHO would only apply within the specified residential and commercial zones, and therefore in general would not affect areas that provide wildlife linkages or nursery sites. Further, the locational criteria in the BRHO require by-right projects developed under the BRHO be outside the areas most likely to include wildlife movement corridors or nursery sites, such as SEAs, HMAs, and the CZ. Therefore, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

BRHO projects would still be subject to the regulations within the Oak Tree Ordinance. The BRHO streamlines multi-family residential projects in the specified zones. It also clarifies how density shall generally be calculated pursuant to the General Plan land use designations with fractional numbers

rounded up. Projects subject to the BRHO would be developed on parcels already zoned for residential or commercial uses, and overall development would not increase beyond what is anticipated in the General Plan Update EIR (the General Plan assumed residential build out of 80 percent of the land use designation capacity). Further, the removal of oak trees requires appropriate permits and approvals through the Los Angeles County Department of Regional Planning, such as Oak Tree Permits. The BRHO would not make any changes to the County Oak Tree Ordinance or OWCMP. Therefore, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Los Angeles County's coastal zone contains valuable biological resources, including San Clemente Island, Santa Catalina Island, Marina del Rey, Ballona Wetlands and the Santa Monica Mountains. The study and management of these resource areas is more rigorous than other areas in Los Angeles County, and any land disturbance is regulated through coastal land use plans and local coastal programs (LCPs), in compliance with the California Coastal Act. The General Plan Update EIR found that the policies of the General Plan Update would not conflict with these goals and policies of these plans and LCPs. The General Plan EIR found impacts would be less than significant.

The BRHO would not make any changes to the coastal land use plans and local coastal programs, because the locational criteria for permit streamlining would require that by-right projects subject to the BRHO be outside of an SEA, and/or the Coastal Zone, including those covered by a Local Coastal Plan (LCP). The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.5 CULTURAL RESOURCES

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that compliance with the goals, policies, and implementation measures of the General Plan Update would reduce impacts to historical resources. However, the policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the General Plan Update. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur in the future. The General Plan Update EIR found that even with implementation of **Mitigation Measures CUL-1** (Mills Act incentives), **CUL-2** (draft a historic preservation ordinance), and **CUL-3** (draft an adaptive reuse ordinance) impacts would be significant and unavoidable.

The BRHO would allow for streamlining multi-family residential projects within specified zones. The BRHO could encourage the development of multi-family housing in these zones which are generally in urbanized areas. Streamlining housing development could result in a modification or other impact to historic buildings. The Historic Preservation Ordinance and State Historic Building Code, as applicable, would be applied on a project by project basis and would, to a limited extent, protect certain historic buildings in the County. As for development under the General Plan Update, it is not possible to determine exactly where development subject to the BRHO would occur, although general locations are provided in the Project Description. The policies within the General Plan Update would continue to apply and minimize to a limited extent the probability of historic structures being demolished and **Mitigation Measures CUL-1**, **CUL-2**, and **CUL-3** would reduce impacts to historic resources. Further any project that includes an historical resource, as defined by PRC § 21084.1 that meet PRC § 5024.1(g) as potentially eligible, would require discretionary review to ensure the development meets Secretary of Interior Standards for Rehabilitation or Reconstruction.

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that forecast development could impact known and unknown archaeological sites. Locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The County is considered potentially sensitive for archaeological resources. Thus, ground disturbance has a high potential for uncovering archaeological resources. However, existing federal, state, and local regulations address the provision of studies to identify archaeological and paleontological resources; application review for projects that would potentially involve land disturbance; project-level standard conditions of approval that address unanticipated archaeological discoveries; and requirements to develop specific mitigation measures if resources are encountered during any development activity. The General Plan Update EIR found impacts would be less than significant with implementation of **Mitigation Measures CUL-4** (archaeologist monitoring) and **CUL-5** (paleontologist monitoring), which apply in the event of an unanticipated discovery of archaeological resources during grading and excavation of the site.

The BRHO's provisions would generally be expected to apply in urban areas where sites are already developed, and impacts would not be substantial since land is already disturbed and resources already impacted. If unexpected archaeological or paleontological resources are discovered during excavation activities such resources must be evaluated in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code § 21083.2, Health and Safety Code § 7050.5, Public Resource Code § 5097.98, and Guidelines § 15064.5(e) address how unexpected finds of human remains are to be handled. In addition, mitigation measures identified in the General Plan Update EIR would apply to development under the BRHO.

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO's provisions would generally be expected to apply in urban areas where sites are already developed, and impacts would not be expected to occur. In cases where undeveloped parcels are found to contain paleontological resources, or parcels that are adjacent to paleontological resources, may have to undergo mitigation per consultation with a designated paleontologist or archeologist, consistent with **Mitigation Measure CUL-4**. In the event that paleontological resources are encountered during the construction process, the project would be required to halt all development activities and retain the services of a qualified paleontologist, who can advise when construction activities can recommence, per the Public Resource Code (PRC) § 5097.5. Compliance with these guidelines would ensure no new or greater impacts would occur.

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR determined that since there are thousands of archaeological sites within Los Angeles County, and human habitation in Los Angeles County is known to date to at least approximately 7,000 years B.C., human remains could be buried in soils. Excavation during construction activities has the potential to disturb human burial grounds, including Native American burials, in underdeveloped areas of the County. However, there are Public Resources Code § 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The Health and Safety Code (§§ 7050.5, 7051, and 7054) also has provisions protecting human burial remains from disturbance, vandalism, or destruction. The General Plan Update EIR found impacts would be less than significant upon compliance with these regulations.

Projects subject to the BRHO would be required to comply with Public Resources Code § 5097.98 as well as the Health and Safety Code (§§ 7050.5, 7051, and 7054). The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Tribal Cultural Resources

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

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

- (e) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?
- (f) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO's zone change and streamlining provisions would generally be expected to apply in urban areas where sites are already developed, and impacts would not be substantial. However, projects subject to the BRHO may cause impacts to unknown archaeological sites containing tribal cultural resources. **Mitigation Measure CUL-4** would continue to apply, and impacts would be reduced to a less than significant level. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.6 GEOLOGY AND SOILS

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

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

- (a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?
 - iv) Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rupture of a Known Earthquake Fault

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

The BRHO would not increase development beyond what is anticipated under the General Plan Update. The siting of residential projects subject to the BRHO would have to comply with the Alquist-Priolo Earthquake Fault Zoning Act. Development under the BRHO would not exacerbate existing earthquake faults and associated risks conditions. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Strong Seismic Ground Shaking

The General Plan Update EIR explains that development projects are required to adhere to the provisions of the California Building Code (CBC). Projects are required to undertake detailed, site-specific geotechnical investigations. The geotechnical investigations identify seismic design parameters pursuant to CBC requirements, including foundation and structural design recommendations, as needed, to reduce hazards to people and structures arising from ground shaking. The General Plan Update EIR found impacts

would be less than significant upon compliance with the requirements of the CBC for structural safety during a seismic event.

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

Liquefaction

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

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

Seismically Induced Landslides

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

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

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

- (b) Result in substantial soil erosion or the loss of topsoil?
- (c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- (d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial risks to life or property?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Erosion

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

Residential projects subject to the BRHO would be required to comply with CBC regulations and the County's development review process, which would ensure appropriate erosion controls are devised and implemented during project construction. Applicable BRHO projects would also have to comply with NPDES requirements as appropriate. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Unstable Geologic Units or Soils and Expansive Soils

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that soil conditions would adequately support proposed septic tanks. Most new development that is anticipated in the County would not require the use of septic tanks or alternative wastewater disposal systems. In those few cases where septic systems might be necessary, such as rural areas of the Santa Clarita Valley and Antelope Valley Planning Areas, the prevailing soil conditions in Los Angeles County are generally amenable to the use to such systems. In addition, all on-site wastewater treatment systems (OWTS) will be required to comply with County Code, Titles 11 and 28 and other regulations applicable to OWTS, including requirements for preparation and submittal of feasibility reports in order to obtain the Department of Public Health - Environmental Health approval for construction and installation of OWTS. As such, there would be no impact from implementation of the

General Plan Update at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. The General Plan Update EIR found impacts would be less than significant.

The BRHO does not increase development beyond what is already anticipated in the General Plan Update EIR. Further, as required by the locational criteria, projects that are eligible for permit streamlining under the BRHO must be located on lots that are served by a public sewer system, and thus would not require the use of septic tanks or alternative wastewater disposal systems. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.7 GREENHOUSE GAS EMISSIONS

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Implementation of the BRHO would not increase GHG emissions beyond that evaluated within the General Plan Update EIR. Furthermore, the County's Community Climate Action Plan (CCAP), which was adopted as part of the General Plan Air Quality Element, described Los Angeles County's plan to reduce GHG emissions in the unincorporated areas of the County by at least 11% below 2010 levels by the year 2020.

The CCAP contains policies and implementing ordinances intended to promote energy efficiency and reduce the urban heat island effect.

The BRHO supports the CCAP in promoting housing in developed areas that are generally near transit. Development will be energy efficient, given that housing would need to comply with Los Angeles County's Green Building regulations in Title 31 and the California Green Building Code (CALGreen), which reference provisions for energy efficiency measures, and housing that promotes alternative modes of transportation. Development subject to the BRHO would comply with the CCAP.

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

To achieve the local goals identified in CARB's 2008 Scoping Plan, the General Plan Update included the CCAP which identifies and evaluates feasible and effective policies to reduce GHG emissions. Implementation of the CCAP would be necessary to ensure that the local GHG reduction goals for the County under AB 32 would be met. Prior to the adoption of the CCAP, the General Plan Update EIR found that consistency with plans adopted for the purpose of reducing GHG emissions toward the short-term target of AB 32 would be significant.

The BRHO will be consistent with the statewide GHG reduction policies evaluated within the General Plan Update EIR. As described above, since the adoption of the General Plan Update in 2015, the state has passed SB 32, which called for a statewide reduction of GHG emissions to 40% below 1990 levels by 2030 and the California Air Resources Board (CARB) released the 2017 Scoping Plan in order to create a framework to meet these deadlines. The General Plan Update determined that the CCAP was necessary to meet local goals within the 2008 CARB Scoping Plan to meet AB 32. Projects subject to the BRHO within the unincorporated portions of the County will be consistent with the CCAP in promoting housing near transit and constructing energy efficient homes consistent with the County's Green Building Regulations. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update, although projects would now be required to comply with the CCAP which could reduce impacts; no new or greater impacts would occur.

3.8 HAZARDS AND HAZARDOUS MATERIALS

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

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- (b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The BRHO would facilitate and streamline multi-family residential projects as identified in the ordinance. Construction of new housing could require the demolition of existing buildings which could contain hazardous materials such as asbestos or lead paint. Handling of hazardous materials in the course of construction would be regulated by existing Health & Safety Code and Fire Code requirements. In some cases, a project level environmental assessment would determine the potential for impacts as well as any required mitigation.

Projects subject to the BRHO are residential projects that do not typically involve the use, storage, disposal, and transportation of hazardous materials other than typical household cleaning products. Therefore, projects subject to the BRHO would not involve the substantial transport, use, and disposal of hazardous materials. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The BRHO would facilitate and streamline multi-family residential projects in the specified zones as defined in the ordinance. Some projects subject to the BRHO could occur on contaminated sites. However, federal and state regulations as well as policies within the Land Use Element of the General Plan would reduce the potential for the public and the environment to be exposed to hazardous materials from existing site conditions. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The locational criteria for permit streamlining would require that by-right projects subject to the BRHO be outside of the 70 or above decibel Community Noise Equivalent Level (dB CNEL) noise contour of an airport influence area, as depicted in the Los Angeles County General Plan. Furthermore, all projects would continue to be subject to existing FAA regulations, County policies and regulations, and General Plan Update goals and policies intended to address potential airport hazards to specific projects. As such, the BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Disaster routes mapped in the General Plan Safety Element are freeways and highways and therefore it is unlikely that a project would be approved that blocks access to such public rights of way. The BRHO would not increase population or the number of total housing units as compared to what was evaluated within the General Plan Update EIR. Projects subject to the BRHO would be required to implement applicable regulations as well as General Plan Update goals and policies to reduce the risk of impaired implementation or physical interference of an adopted emergency response plan or emergency evacuation plan. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO facilitates and streamlines the review process for certain multifamily projects. The locational criteria would not allow multi-family residential developments “by-right” within Very High Fire Hazard Severity Zones. Based on the affected zones, projects subject to the BRHO’s permit streamlining provisions would likely be built in urban areas that are accessible to services and municipal water systems. Any projects subject to the permit streamlining provisions constructed in these areas as a result of this ordinance would be regulated by existing Health & Safety Code, Building Code and Fire Code requirements. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.9 HYDROLOGY AND WATER QUALITY

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO is not expected to result in new development that would not otherwise occur as the permit streamlining provisions would only apply to specified residential and commercial zones located outside of the specified locational criteria and in urban areas. Therefore, it is unlikely there would be any increase in impervious surface as a result of the BRHO. Further, projects would be subject to the County's Low Impact Development Ordinance which requires project runoff now exceed pre-development conditions. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Development within these flood zones, including under the BRHO, is required to improve flood control facilities and obtain a Letter of Map Revision from FEMA to demonstrate improvement; or construct floor beams raised above the 100-year flood elevations. Additionally, projects are required to comply with the County's municipal code for building with flood-prone areas. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR indicates that dam inundation areas span some unincorporated areas of all the County except the South Bay Planning Area; and parts of the Antelope – Fremont Valleys, Santa Clara,

San Gabriel River, Santa Monica Bay, Los Angeles River, and San Pedro Channel Islands watersheds. Considering the relatively small proportional net increases in numbers of residents and workers that would be put at potential risk from dam inundation; the operation of most of the dams as flood control dams, not impounding large reservoirs most of the time; and safety requirements and inspections by the Division of Safety of Dams, the General Plan Update EIR found that impacts would be less than significant.

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

(h) Does the BRHO Require Subsequent or Supplemental CEQA Documentation with respect to inundation by seiche, tsunami, or mudflow?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The presence of a potential landslide hazard is determined at the project level and is addressed by existing regulatory requirements. The County includes 75 miles of coastline, coastal areas near this coastline lie in

tsunami hazard zones, as provided by the California Department of Conservation. The locational criteria for permit streamlining would require that by-right projects subject to the BRHO be outside of the Coastal Zone. Furthermore, the Local Coastal Program contains analysis and policies governing assessment and mitigation of tsunami and seiche risk. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.10 LAND USE AND PLANNING

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO would not incentivize the construction of transportation or other types of projects that have the ability to physically divide an area. The BRHO would facilitate and streamline multifamily housing in zones that are consistent with such housing and as such would not be expected to create any physical barriers. Projects subject to the BRHO would be consistent with the allowable densities specified in the General Plan Land Use Element. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Development in accordance with the BRHO's permit streamlining provisions would occur primarily in urban residential, commercial, and mixed-use areas that are serviced by transit. The BRHO would be consistent with local land use plans, goals, and policies calling for more housing, affordable housing, and transit serving development. All development under the BRHO has already been evaluated by the General Plan Update. The BRHO would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by expanding the supply of affordable housing. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concluded that the General Plan Update would not conflict with adopted habitat conservation plans. Although anticipated development under the General Plan Update would include development and redevelopment in areas covered by conservations plans, such development

would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.

As described in **Section 3.4, Biological Resources**, any projects subject to the BRHO developed in areas covered by conservation plans would be required to comply with provisions of those plans. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.11 MINERAL RESOURCES

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The BRHO's permit streamlining provisions would address development in residential and commercial zones that are already mostly urbanized and would not be expected to substantially reduce the regional availability of oil and natural gas. While projects subject to the BRHO could be constructed in the Antelope Valley Planning Area, it is not anticipated that project sites to be developed under the BRHO are currently in use as mineral extraction. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

3.12 NOISE AND VIBRATION

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO would result in projects that would generate some construction noise and could expose residents to sources of noise. However, construction activities are subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The BRHO would not lead to the development of industrial uses, which tend to generate the most significant operational noise impacts. Projects resulting from the BRHO would be multi-family residential developments which do not generate significant amounts of noise compared to other types of uses (i.e., industrial). As demonstrated within the Project Description, the location of the BRHO's by-right projects would be distributed throughout the County, as a result, any associated traffic increases would not be site specific. Traffic associated with development under the BRHO would be within the assumptions

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO is not anticipated to result in significant generation of, groundborne vibration or groundborne noise levels in excess of County standards. Projects that would occur as a result of the BRHO are multi-family residential projects. The BRHO would not include the development of industrial land uses typical of excessive groundborne vibration or groundborne noise levels. However, construction of projects subject of the BRHO may result in short-term ground-borne vibration or groundborne noise levels and would be required to implement **Mitigation Measure N-4**, consistent with the General Plan Update. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Projects would be subject to Title 12 of Los Angeles County Code, which regulates construction noise and establishes acceptable noise exposure standards for different land use types. The BRHO does not provide incentives for industrial uses, which tend to generate the most significant noise impacts. Additionally, the projects would be required to implement the General Plan's **Mitigation Measure N-1**, which would reduce impacts associated with construction activities to the extent feasible. Existing noise levels on sites where projects are most likely to occur is anticipated to be generally urban and in proximity to transit. Noise impacts would be temporary and typical for construction activity, which is allowable in urban areas and therefore reasonably anticipated to occur. In addition, all stationary equipment (primarily anticipated to be HVAC equipment) would be required to comply with county regulations to ensure noise levels do not exceed ambient noise level standards. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR explains that development is required to be consistent with any applicable Airport Land Use Compatibility Plan (ALUCP) constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Land Use Element and Noise Element of the General Plan related to land use compatibility would ensure that development would not conflict with airport land

use plans. Therefore, future development under the General Plan Update would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels (and would not exacerbate existing impacts).

The BRHO projects would be required to comply with policies included in the Land Use Element and Noise Element of the General Plan to ensure that development would not conflict with airport land use plans. Further, the locational criteria for permit streamlining would require that by-right projects subject to the BRHO be outside of the 70 or above decibel Community Noise Equivalent Level (dB CNEL) noise contour of an airport influence area, as depicted in the Los Angeles County General Plan, in its entirety. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.13 POPULATION AND HOUSING

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that the General Plan Update would directly result in population growth in the County. According to the General Plan Update EIR, the estimated post 2035 population of Los Angeles County would be 2,356,890 residents. The mixture of land uses and densities anticipated for to occur under the General Plan Update would more than accommodate the growth projected by SCAG for 2035 and beyond. The General Plan Update EIR anticipates a total of up to 659,409 housing units. At the time of the General Plan Update EIR, SCAG projected a total of 405,500 units by 2035. The housing and population growth anticipated under the General Plan Update would more than accommodate SCAG projections and do not constitute a significant adverse environmental impact.

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

The BRHO encourages development of additional housing units and is one strategy proposed by the County to meet its RHNA. However, due to the limited nature of where the BRHO's permit streamlining provisions would apply, it is not anticipated to result in a substantial increase in population, and the effects of the BRHO on its own would be within the assumptions of the General Plan Update. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO is unlikely to result in the displacement of substantial numbers of existing housing units, either market rate or affordable. The purpose of the BRHO is to increase housing supply in the County. Additionally, by-right multi-family residential projects developed under the BRHO will most likely be on parcels that are zoned commercial with existing non-residential uses, therefore these projects will likely not displace existing housing or residents. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.14 PUBLIC SERVICES

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Fire Protection and Emergency Response

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

By-right projects that are subject to the BRHO will likely be outside of areas with the highest fires risk in Los Angeles County. The locational criteria for permit streamlining would require that by-right projects subject to the BRHO be outside of Very High Fire Hazard Severity Zones. Projects subject to the BRHO's permit streamlining provisions are more likely to occur in urban infill areas where the fire risk is lower. The BRHO would not increase development beyond what is already anticipated in the General Plan Update

EIR. Therefore, consistent with the General Plan Update EIR, implementation of **Mitigation Measures PS-1, PS-2, and PS-3** would reduce any potential impacts associated with projects subject to the BRHO. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Law Enforcement

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

Similar to fire services, the by-right projects subject to the BRHO are not expected to increase population, but rather to facilitate and streamline housing development in the County. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

School Services

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

The BRHO encourages the development of multi-family residential projects in specified zones by the permit review process; it would not be expected to increase population substantially as it only applies to a limited number of parcels that meet specific locational criteria. Therefore, it is unlikely that additional schools would need to be constructed as a result of the BRHO. Projects subject to the BRHO would be required to pay established impact fees at the time of building permit issuance, which would adequately

mitigate any impacts generated to school service. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Library Services

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

The BRHO may encourage the development of new projects, however as discussed above, the projected development under the BRHO has already been evaluated within the General Plan Update and the BRHO would not increase total forecast population as it would apply to a limited number of parcels and within specific zones. Therefore, it is unlikely that additional libraries would need to be constructed as a result of the BRHO. Regardless, consistent with the General Plan Update, projects subject to the BRHO would be required to pay the County's established library facility fee at the time of building permit issuance, which would adequately mitigate any impacts generated to libraries. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.15 RECREATION

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO would not induce population growth within the County; rather it would serve the existing residents by adding units to the housing stock and streamlining the permit review process for multi-family housing. All new development would continue to be subject to local policies and guidelines regarding the provision of parks and recreation facilities. Therefore, the BRHO would not increase the use of existing neighborhood and regional parks and recreational facilities such that substantial physical deterioration would be substantially exacerbated. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

As discussed above, the BRHO would not induce population growth within the County; rather it would serve the existing residents by adding units to the housing stock and streamlining the permit review process for multi-family housing. Projects subject to the BRHO would comply with existing federal, state, and local regulations regarding parks and recreational facilities. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.16 TRANSPORTATION AND TRAFFIC

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

- (a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- (b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that anticipated development under the General Plan Update would impact levels of service on the existing roadway system. **Mitigation Measures T-1** through **T-5** would reduce these impacts. **Mitigation Measure T-1** would ensure projects are evaluated and traffic improvements identified to maintain minimum levels of service in accordance with the County's Traffic Impact Analysis Guidelines. **Mitigation Measure T-2** would require the county to implement over time objectives and policies contained within the General Plan Mobility Element. **Mitigation Measure T-3** would require the county to participate on a potential Congestion Mitigation Fee program. **Mitigation T-4** directs the County secure the funding needed to implement the future planned improvements. **Mitigation**

Measure T-5 directs the County to work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent to unincorporated areas. These mitigation measures would reduce impacts; however, the impacted locations are still considered to be significant. Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements located within cities lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control (e.g., the County cannot undertake or require improvements outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans' approval). Therefore, the General Plan Update EIR determined impacts would be significant and unavoidable.

Similar to the General Plan Update, it is not possible to determine exactly where by-right developments pursuant to the BRHO would occur. **Figure 2-3** and **Figure 2-4** show the general locations of where by-right developments under BRHO would and would not apply. In general, projects that are subject to the BRHO's permit streamlining provisions would be located in urbanized areas in close proximity to transit and walkable areas. As shown in the Project Description, these projects would be distributed throughout the County. In general, the BRHO would facilitate and streamline development in urban areas that would be expected to reduce VMT in the County. The BRHO would not substantially change traffic impacts as compared to those anticipated to occur under the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

In general, the locational criteria for projects that are subject to the BRHO's permit streamlining provisions require a project to be located outside of the 70 or above decibel Community Noise Equivalent Level (dB CNEL) noise contour of an airport influence area. While the BRHO could allow projects in the vicinity of an airport, these projects would be limited in number and therefore unlikely to significantly affect flight paths or air travel. Projects would be subject to the height restrictions for the associated zone therefore, it is unlikely that projects would exceed 200 feet in height (a threshold for consultation with the Federal Aviation Administration).

Existing FAA regulations and the ALUCPs and are intended to identify and properly address potential airport hazards prior to implementation of specific projects. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Development in accordance with the BRHO would be located within residential and commercial zones, as defined in the Project Description. Projects would continue to be consistent with General Plan Update policies. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

3.17 UTILITIES AND SERVICE SYSTEMS

Wastewater Treatment and Collection

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

- (b) Would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- (c) Would result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR explains that projects are required to pay connection fees to the LACSD, or corresponding types of fees to the City of Los Angeles Bureau of Sanitation, as applicable. Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Antelope Valley and Santa Clarita Valley Planning Areas. The General Plan Update EIR determined there is sufficient wastewater treatment capacity in the remaining Planning Areas and impacts would be less than significant.

Wastewater. By-right developments subject to the BRHO would likely occur in urbanized areas zoned for residential development and would be required to connect to the existing sewer lines based on the locational criteria for permit streamlining. The size of individual projects is anticipated to be relatively small, resulting in minor impacts to the sewer system in the vicinity of each site. Development in accordance with the BRHO would be required to comply with all applicable County regulations. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Water. Water would be conveyed to projects along existing circulating water mains of varying sizes. By-right projects are anticipated to be generally located in infill areas on land previously developed with residential uses and be served by water systems as required by the locational criteria for permit streamlining. Projects would be subject to Los Angeles County's Low Impact Development (LID) requirements, Los Angeles County's drought-tolerant landscaping requirements, and CALGreen construction requirements for low flow fixtures and other water conservation features. Development in accordance with the BRHO would be required to comply with water conservation requirements and ensure that adequate infrastructure exist. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Water Supply and Distribution System

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

- (d) Would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- (e) Would not have sufficient water supplies available to serve the project from existing entitlements and resources, and new and/or expanded entitlements would be needed?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The General Plan Update EIR concludes that adequate water supplies have been identified in the UWMP's for the County for demand as projected through the year 2035. However, additional water supplies necessary to serve anticipated development under the General Plan Update, which is expected to occur beyond the year 2035, have not been identified for the Antelope Valley and Santa Clarita Valley Planning Areas. It is uncertain whether the water districts serving the Antelope Valley and Santa Clarita Valley Planning Areas would be able to secure water supplies greater than those currently forecasted for 2035.

Mitigation Measures USS-1 through USS-23 would lower these impacts, however the General Plan Update EIR finds that impacts would be significant and unavoidable.

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

Solid Waste

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

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

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The BRHO does not increase development beyond what is already anticipated in the General Plan Update EIR. It is unlikely to result in projects that would significantly impact landfill capacity. "By-right" housing developments are likely to be located in areas with existing residential or commercial uses that are already served by existing landfills. Projects that obtain planning and building approvals would be consistent with

solid waste regulations. The BRHO would not substantially change impacts as compared to those identified for the General Plan Update; no new or greater impacts would occur.

Other Utilities

Does the By-Right Require Subsequent or Supplemental CEQA Documentation with respect to the following:

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

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
New or Substantially More Severe Significant Impacts Shown by New Information?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ability to Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Electricity

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

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

Natural Gas

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

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

3.18 CUMULATIVE IMPACTS

Cumulative projects to the BRHO that would also further General Plan goals and would facilitate housing/affordable housing in the County are described in the **Chapter 1.0, Introduction, Section 1.7 Background and Planning History**.

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

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

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

The geographic area for evaluation of cumulative impacts is the area within which impacts of the General Plan Update could overlap with impacts of other projects within Los Angeles County. The General Plan

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

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

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

4.0 REFERENCES AND PREPARERS

4.1 REFERENCES

California Housing Partnership Corporation (May 2017). Los Angeles County Rents in Crisis: A Call for Action. <http://1p08d91kd0c03rlxhmhtydpr.wpengine.netdna-cdn.com/wp-content/uploads/2017/05/Los-Angeles-County-2017.pdf>

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

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

Maxwell, C. (February 24, 2017). New Study Finds Los Angeles County Needs 551,807 Affordable Homes. <https://chpc.net/resources/newsletter-new-study-finds-los-angeles-county-needs-551807-affordable-homes/>

Southern California Association of Governments (SCAG). Estimate of SCAG RHNA Allocation Based on Regional Council Approved Final Methodology. Available at: <http://www.scag.ca.gov/programs/Documents/RHNA/Staff-Recommended-RHNA-Estimated-Allocations-030520.pdf>

SCAG. Connect SoCal: Demographics and Growth Forecast Technical Report. Available at: https://www.connectsocial.org/Documents/Proposed/pfConnectSoCal_Demographics-And-Growth-Forecast.pdf

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