



## DEPARTMENT OF CITY PLANNING Executive Office

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

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May 2, 2019

TO: Department of City Planning Staff

FROM: Vincent P. Bertoni, AICP  
Director of Planning

**SUBJECT: ADVISORY MEMO ON THE DEPARTMENT OF CITY PLANNING  
2019 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)  
THRESHOLDS**

This memo serves to document that the Department of City Planning is adopting the State CEQA Guidelines and Appendix G environmental checklist questions as the Department's CEQA thresholds of significance pursuant to CEQA Guidelines Section 15064.7(b), effective May 2, 2019, the date of this memo. This update is to comply with State law, the 2019 updates to CEQA, and all future updates to CEQA.

### **Overview of 2019 Changes to the CEQA Thresholds**

Changes to CEQA addressing aesthetics, water supply, utilities, greenhouse gas emissions, energy, and wildfire will better enable communities to respond to the effects of climate change. The most significant change to the thresholds is the addition of Energy and Wildfire as two new environmental impact categories.

The new Energy section includes questions that focus on energy consumption and potential conflict with existing energy plans. The new Wildfire section includes questions pertaining to development in Very High Fire Hazard Severity Zones (VHFHSZ).

The State has clarified with this update to CEQA that cities may use existing regulations put in place to protect the environment, such as the Low Impact Development and Noise ordinances, as thresholds.

### **Using the New Thresholds**

The Department's new CEQA thresholds of significance are the CEQA Appendix G environmental checklist questions. As of May 2, 2019, all new CEQA analysis undertaken will use these updated thresholds for environmental review.

The Department previously used a combination of the State CEQA Guidelines Appendix G questions, as well as other agency regulations, as thresholds for project

review. The 2006 LA City CEQA Thresholds Guide may still be used to inform environmental analysis, as appropriate, and be used as a reference guide, but will no longer be used as the Department's default threshold.

Any project with an initial study is now required to include Energy and Wildfire analysis. Wildfire analysis is only necessary when a project is located in or near a VHFHSZ. Additionally, all initial studies must now include energy analysis. If there are any questions about whether any project requires an Energy or Wildfire analysis, or how to include those analyses, please bring the case to the Environmental Staff Advisory Committee (ESAC) or the Environmental Policy Unit.

At this time, planners will no longer use eForms to produce any new initial study. The updated Initial Study template should be used instead for the preparation of all new initial studies until such time as eForms is updated. If a project has draft initial study material prepared by an applicant, or there is uncertainty regarding using the new template or amending the existing clearance, the case may be scheduled for ESAC review, or contact the Environmental Policy Unit.

These new procedures do not apply to environmental documents which have already been published.

### **Authority**

The Department's action complies with CEQA Guidelines Section 15064.7(b) as the Appendix G thresholds were adopted after a public review process, which included noticed public workshops and hearings on November 28 and 29, 2018, and December 4 and 6, 2018, and a City Planning Commission hearing on February 28, 2019; and pursuant to the Director's rulemaking authority provided in City Charter Section 506.

### **Additional Resources**

Additional information regarding the State CEQA updates can be found in P:\Environmental\CEQA Guidelines\2019 CEQA. The revised Initial Study template can be found in P:\Environmental\Initial Study.

The Environmental Policy Unit continues to work with the City Attorney's Office on updates to CEQA and will provide further direction to staff as needed. Additional guidance on the updated CEQA thresholds is forthcoming. If you have any questions, comments, or concerns, please contact Diana Kitching in the Environmental Policy Unit at (213-847-3653) or at [Planning.CEQA@lacity.org](mailto:Planning.CEQA@lacity.org)

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