CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY:	COUNCIL DISTRICT:
City of Los Angeles	CD 1 – CD 15

PROJECT TITLE:	ENVIRONMENTAL CASE NO:
Permanent Supportive Housing Ordinance (PSH)	ENV-2017-3137-MND

PROJECT LOCATION: Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use and located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion and Demolition Ordinance in LAMC Section 47.70 et seq.).

PROJECT DESCRIPTION:

The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 and 16.05 of the LAMC establishing regulations that define PSH and project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review and approval, as well as modify certain provisions related to height and density, consistent with State Density Bonus Law.

The PSH Ordinance would allow for projects to select up to four concessions with respect to the Zoning Code, including up to 20 percent decrease in required setbacks, up to 20 percent reduction in required open space, up to 20 percent increase in lot coverage limits, up to 35 percent increase in FAR and depending on the height district up to a 35 percent increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle.

FINDING: The Department of City Planning of the City of Los Angeles finds that the proposed Project WILL NOT have a significant effect on the environment, an ENVIRONMENTAL IMPACT REPORT is NOT required. The INITIAL STUDY/MITIGATED NEGATIVE DECLARATION prepared for this project is attached.

NAME OF PERSON PREPARING FORM:	PLANNER NAME AND TITLE:	TELEPHONE NUMBER:
Los Angeles Department of City Planning	Cally Hardy, Planning Assistant	213-978-1643
ADDRESS	**SIGNATURE (Official)**	**DATE:**
200 N. Spring Street, Room 278 Los Angeles, CA 90012	Cally Hardy	11/27/2017

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST (Article IV B City CEQA Guidelines)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 1 – CD 15	**DATE:** November 16, 2017

RESPONSIBLE AGENCY: Department of City Planning

ENVIRONMENTAL CASE: ENV-2017-3137-MND	

PROJECT DESCRIPTION:

The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 and 16.05 of the LAMC establishing regulations that define PSH and project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review and approval, as well as modify certain provisions related to height and density, consistent with State Density Bonus Law.

The PSH Ordinance would allow for projects to select up to four concessions with respect to the Zoning Code, including up to 20 percent decrease in required setbacks, up to 20 percent reduction in required open space, up to 20 percent increase in lot coverage limits, up to 35 percent increase in FAR and depending on the height district up to a 35 percent increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle.
See attached Initial Study for further details.

ENVIRONMENTAL SETTING: Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use and located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion and Demolition Ordinance in LAMC Section 47.70 et seq.).

PROJECT LOCATION: The City of Los Angeles

COMMUNITY PLAN AREA: All **STATUS:** ☐ Preliminary ☐ Proposed ☒ **ADOPTED,**	☒ Does Conform to Plan ☐ Does NOT Conform to Plan	**AREA PLANNING COMMISSION:** All	**CERTFIED NEIGHBORHOOD COUNCIL:** All

EXISTING ZONING: Generally multi-family residential zones, plus Residential Hotel conversions any zone, plus PF zones.	**LA River Adjacent:** Yes
GENERAL PLAN LAND USE: Various	

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Planning Assistant Title	213-978-1643 Phone

City of Los Angeles

Department of City Planning • Policy Division

City Hall • 200 N. Spring Street, Suite 667 • Los Angeles, CA 90012

INITIAL STUDY

Permanent Supportive Housing Ordinance

Case Number: ENV- 2017-3137-MND

Project Location: The Proposed Permanent Supportive Housing (PSH) Ordinance would be applicable within the City of Los Angeles.

Council Districts: 1 - 15

Project Description:

The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 and 16.05 of the LAMC establishing regulations that define PSH and project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review and approval, as well as modify certain provisions related to height and density.

The PSH Ordinance would allow for projects to select up to four concessions with respect to the Zoning Code, including up to 20 percent decrease in required setbacks, up to 20 percent reduction in required open space, up to 20 percent increase in lot coverage limits, up to 35 percent increase in FAR and depending on the height district up to a 35 percent increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle.

PREPARED BY:

Impact Sciences, Inc.
28 N. Marengo Avenue
Pasadena, CA 91101

ON BEHALF OF:

City of Los Angeles
Department of City Planning
Policy Division

November 2017

TABLE OF CONTENTS

Section	Page
I. INTRODUCTION	I-1
II. PROJECT DESCRIPTION	II-1
III. INTIAL STUDY CHECKLIST	III-1
IV. ENVIRONMENTAL IMPACT ANALYSIS	IV-1
1. Aesthetics	IV-1
2. Agriculture and Forestry Resources	IV-5
3. Air Quality	IV-6
4. Biological Resources	IV-13
5. Cultural Resources	IV-16
6. Geology and Soils	IV-21
7. Greenhouse Gas Emissions	IV-26
8. Hazards and Hazardous Materials	IV-36
9. Hydrology and Water Quality	IV-41
10. Land Use and Planning	IV-49
11. Mineral Resources	IV-51
12. Noise	IV-52
13. Population and Housing	IV-58
14. Public Services	IV-59
15. Recreation	IV-61
16. Transportation and Traffic	IV-62
17. Tribal Cultural Resources	IV-65
18. Utilities and Service Systems	IV-67
19. Mandatory Findings of Significance	IV-74
V. PREPARERS	V-1
VI. ACRONYMS AND ABBREVIATIONS	VI-1

LIST OF FIGURES

Figure **Page**

1 City of Los Angeles II-2
2 City of Los Angeles Planning Areas II-3
3 Current PSH Project Locations , Projects Completed 2008 to 2016 ..... II-11
4 PSH Eligible Parcels II-19
5 City Owned Parcels Map II-21
6 Residential Hotel Locations, City of Los Angeles II-23

LIST OF TABLES

Table **Page**

1 Housing Success by Type II-9

2 Retention Rates for Chronically Homeless (CH) in Permanent Supportive Housing (PSH) II-9

3 Permanent Supportive Housing Units Completed Between 2008 and 2016 ..... II-10

4. AHOS Round One Properties II-20

5 Modeled Annual Construction Schedule – 200 PSH Units IV-8

6 Estimated Daily Construction Emissions – 200 PSH Units IV-8

7 Estimated Daily Operations Emissions IV-9

8 Estimated Construction CO2e Greenhouse Gas Emissions (Metric Tons per Year) IV-32

9 Estimated Annual Operational CO2e Greenhouse Gas Emissions (Metric Tons per Year) IV-32

10 Consistency with Applicable Greenhouse Gas Reduction Strategies IV-33

11 Construction Equipment Vibration Levels (PPV) IV-54

12 Construction Equipment Noise Levels IV-56

I. INTRODUCTION

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) is a proposed new Project that includes adoption of text amendments to the Zoning Ordinance that would provide a streamlined development process for of PSH units (Project, PSH Ordinance or Proposed Ordinance), and permit PSH development to exceed the minimum lot area per dwelling unit or guest room standards for zone in which it is located, consistent with State Density Bonus Law. The City of Los Angeles (City) conservatively estimates that up to an additional 200 units a year could be developed based on the net benefit of the changes to the City's Zoning Code included in the PSH Ordinance.

The PSH Ordinance does not approve specific development projects. PSH development in the future under the PSH Ordinance could occur anywhere that is zoned for multifamily residential development in the City of Los Angeles and that is within a High Quality Transit Area (HQTA), as well as some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion and Demolition Ordinance in LAMC Section 47.70 et seq.). A full description of the Proposed Ordinance and development that could occur as a result of the Proposed Ordinance is provided in **Section II, Project Description**. The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

ORGANIZATION OF INITIAL STUDY

This Initial Study is organized into four sections as follows:

Introduction: This section provides introductory information such as the Project title, Project location, and the lead agency for the Project.

Project Description: This section provides a detailed description of the environmental setting and the Project, including Project characteristics and environmental review requirements.

Initial Study Checklist: This section contains the completed Appendix G Initial Study Checklist included in the State CEQA Guidelines.

Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area.

II. PROJECT DESCRIPTION

This section provides information regarding the proposed Permanent Supportive Housing Ordinance ("Project" or "Proposed Ordinance" or "PSH Ordinance") being evaluated in this environmental document. The project description contains the following information: (1) project location; (2) a general description of the project's technical, economic, and environmental characteristics; and (3) a statement briefly describing the intended uses of the MND. The *CEQA Guidelines* state that a project description need not be exhaustive, but should provide the level of detail needed for the evaluation and review of potential environmental impacts.

PROJECT LOCATION

The Proposed Ordinance would apply citywide. The City of Los Angeles encompasses 503 square miles (refer to **Figure 1 City of Los Angeles**). For planning purposes, the City of Los Angeles is divided into 37 planning areas -- 35 Community Plan Areas (CPA) plus the Port of Los Angeles and Los Angeles World Airport. The 37 planning areas are shown in **Figure 2, City of Los Angeles Planning Areas**.

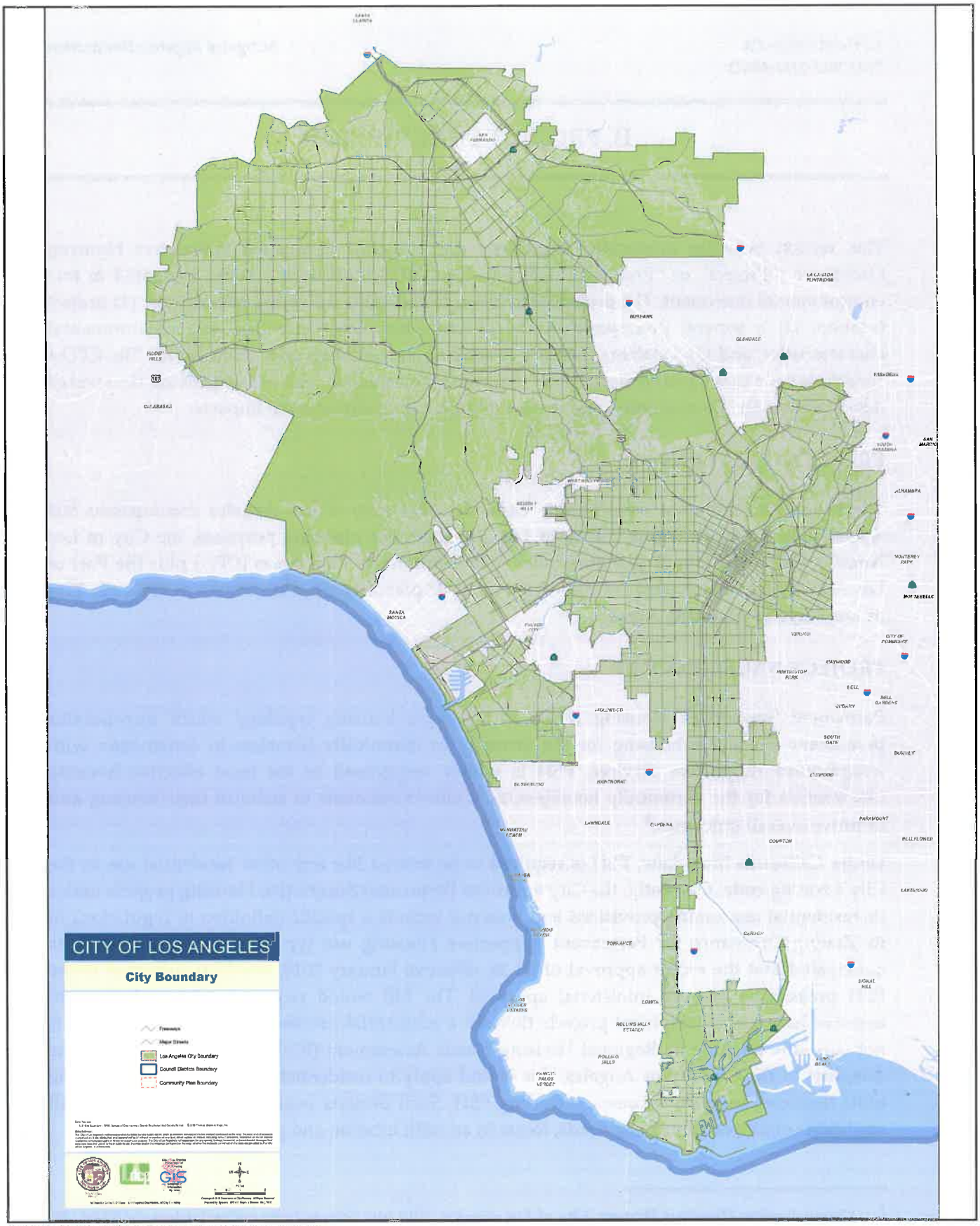
PROJECT BACKGROUND

Permanent Supportive Housing (PSH) is a unique housing typology which incorporates permanent affordable housing for the formerly or chronically homeless in conjunction with wraparound supportive services. PSH is widely recognized as the most effective housing intervention for the chronically homeless, as it allows residents to stabilize their housing and improve overall outcomes.[1]

Under California State Law, PSH is required to be treated like any other residential use in the City's zoning code. Currently, the City approves Permanent Supportive Housing projects under its residential use zoning provisions and does not include a specific definition or regulations in its Zoning Ordinance for Permanent Supportive Housing use typologies. Furthermore, it is anticipated that the recent approval of SB 35, effective January 2018, would require that many PSH projects be granted ministerial approval. The bill would require local jurisdictions to approve housing development projects through a ministerial process provided that the City is not currently meeting its Regional Housing Needs Assessment (RHNA) goals for that income category. In the City of Los Angeles, this would apply to residential projects with 100% of the units restricted to lower incomes, including PSH. Such projects would be required to meet all applicable objective zoning standards, locate in an infill location and pay a prevailing wage.

---

1 Comprehensive Homeless Strategy, City of Los Angeles, 2015 http://clkrep.lacity.org/onlinedocs/2015/15-1138-S1_misc_1-7-16.pdf



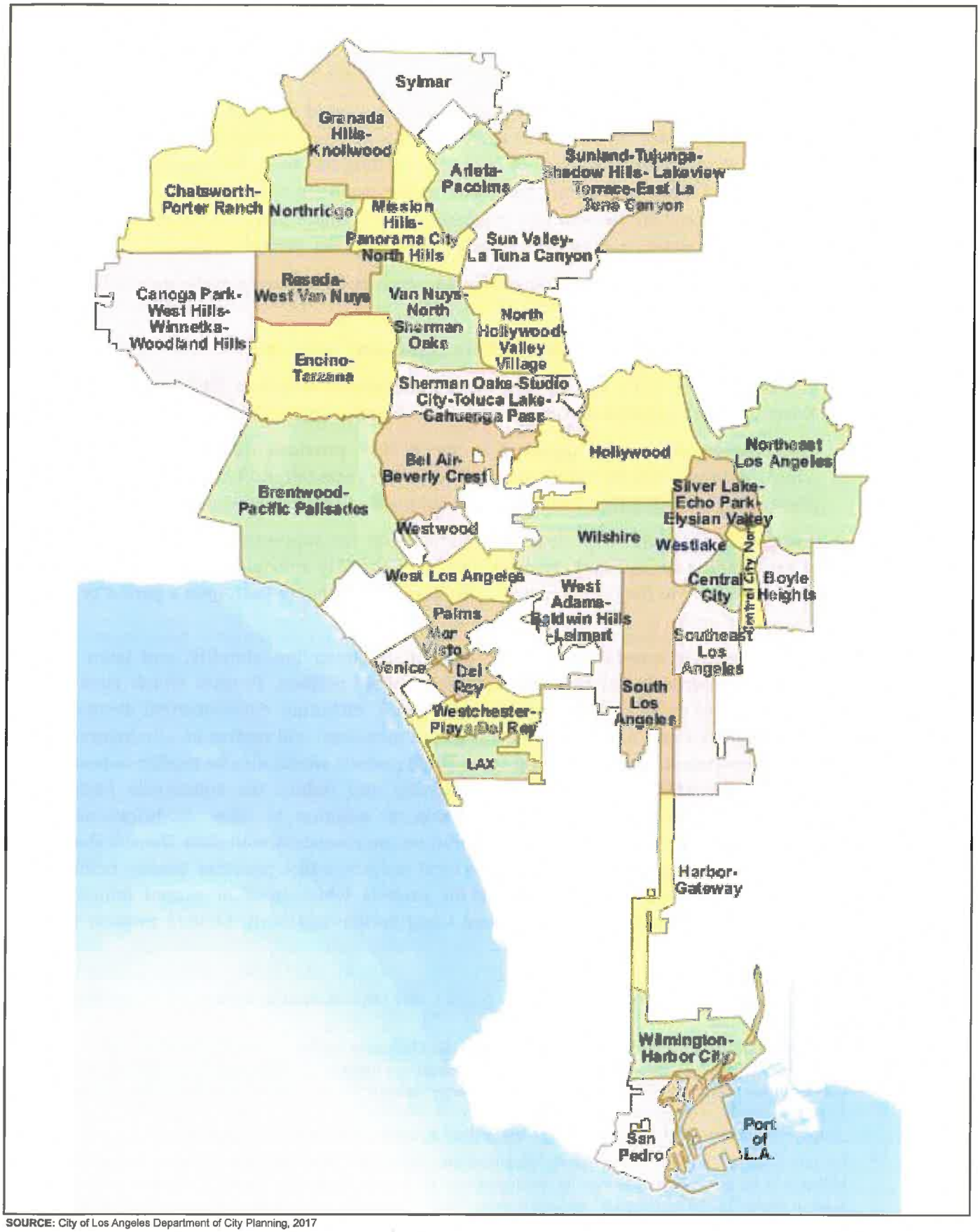
SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE **1**

IMPACT SCIENCES

City of Los Angeles

1264.008•03/17



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE **2**

IMPACT SCIENCES

City of Los Angeles Planning Areas

1264.008•03/17

The City's Comprehensive Homeless Strategy[2] identified a need to build at least 1,000 PSH units per year, an increase of up to 700 units from its current average production rate of approximately 300 units per year. Lack of adequate funding has been the primary barrier to achieving this goal. Exacerbating this constraint is the extent to which PSH projects often require lengthy planning entitlement and processing times, where project costs are driven up and construction completion may be delayed as long as one to two years.[3]

A number of new dedicated funding sources have recently been approved at the state and local levels:

- $2 billion bond in the California "No Place Like Home" initiative; [4]
- $1.2 billion local (City of Los Angeles) bond measure (Measure HHH) approved in November 2016, generated over a period of ten years;
- County-wide Measure H, approved in March 2017, provides a 0.25 percent sales tax which could generate $355 million annually for ten years to fund homeless services and prevention, including rental subsidies and supportive services associated with PSH.

These revenue streams will help close the funding gap for supportive housing. Based on historical gap-funding sources and construction trends, the City anticipates that these funding sources will contribute to the production of 1,000 new PSH units per year, over a period of ten years.

The PSH Ordinance is a code amendment intended to streamline, simplify, and tailor the entitlement and environmental review processes for PSH projects. Projects which meet all required regulations developed through this ordinance, including environmental standards which incorporate relevant and applicable mitigation measures, will receive an administrative clearance by Department of City Planning staff. These projects would also be eligible to receive an increase in the project's total residential density and reduce the automobile parking requirements consistent with PSH resident needs, in addition to other modifications in development standards. These bonuses and incentives are consistent with State Density Bonus law, which allows for jurisdictions to adopt a local ordinance that provides density bonuses greater than 35% and additional incentives for projects which meet or exceed minimum affordable housing requirements (Government Code Section 65915(n)). Limited projects will

---

2 Comprehensive Homeless Strategy, City of Los Angeles, 2015 http://clkrep.lacity.org/onlinedocs/2015/15-1138-S1_misc_1-7-16.pdf

3 Affordable Housing Cost Study, Analysis of the Factors that Influence the Cost of Building Multi-Family Affordable Housing in California, The California Department of Housing and Community Development, the California Tax Credit Allocation Committee, the California Housing Finance Agency, and the California Debt Limit Allocation Committee, October 2014 _https://www.novoco.com/sites/default/files/atoms/files/ca_development-cost-study_101314.pdf

4 On July 1, 2016, Governor Brown signed legislation enacting the No Place Like Home program to dedicate $2 billion in bond proceeds to invest in the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or who are at risk of chronic homelessness.

require some level of discretionary review, either Site Plan review or review under LAMC Section 14.00B, where they will be required to demonstrate that they substantially fulfill the requirements of the PSH Ordinance, are consistent with the General Plan, and adequate project level CEQA clearance is adopted. These changes to the process for obtaining PSH approvals are expected to gain efficiencies to allow the City to increase the amount of expected housing units from 1,000 up to a potential 1,200 a year.

It is anticipated that the effect of the Proposed PSH Ordinance would be to result in cost efficiencies that would allow additional units to be generated from the previously approved gap-funding sources discussed above, beyond those already projected. A 2014 study by the State of California analyzed the effect of regulatory zoning hurdles (such as those the PSH Ordinance intends to remove) on affordable housing.[5] The study concluded the following:

- Projects subject to discretionary design-review processes were on average about 7 percent more expensive to develop relative to projects to non-discretionary projects.
- Podium parking added approximately 5 percent to cost of project. (By comparison to the City's parking standards, using the same formula, this parking would add 1.5% to a project.)
- Allowing density increases results in decrease in per unit costs. For each 10% increase in the number of units, the cost per unit declines by 1.7%. (Using a conservative estimate, this could result in an 11.7% savings with a 100 percent density increase.)

Based on this study, and due to the fact that the construction of PSH is constrained by the availability of public funding, it is reasonably foreseeable that the Proposed PSH Ordinance could, with the most generous assumptions (and conservative for purposes of environmental review), result in the construction of an additional 200 units per year of PSH in addition to the 1,000 units per year anticipated to result from Measure HHH and other previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance in this MND, the City is analyzing the impacts of construction and operation of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 or 1,000 units a year for the next 10 years is part of the cumulative development allowed by the previously approved gap funding projects, identified above.

---

5 Affordable Housing Cost Study, Analysis of the Factors that Influence the Cost of Building Multi-Family Affordable Housing in California, The California Department of Housing and Community Development, the California Tax Credit Allocation Committee, the California Housing Finance Agency, and the California Debt Limit Allocation Committee, October 2014
https://www.novoco.com/sites/default/files/atoms/files/ca_development-cost-study_101314.pdf

Need for the Project

Demographic Overview of Los Angeles Homeless Population

According to the Los Angeles Homeless Services Authority (LAHSA) January 2017 Greater Los Angeles Homeless Count there are approximately 34,189 homeless in the City of Los Angeles, of which 25,237 (74%) are unsheltered and 8,952 (26%) are sheltered.[6] The unsheltered live on the streets, in river drainages, under freeway overpasses and in other similar locations not intended for human habitation. Females comprise 31 percent (10,606 persons) of the homeless and males comprise 68 percent (23,139 persons). The majority are single adults (26,728 or 78%), approximately 13 percent or 4,509 are family members and 0.5 percent of the homeless population (156 persons) is comprised of unaccompanied minors. All ethnicities and ages and segments of the City have been affected by homelessness, although persons of color are disproportionately represented in the City's homeless population. Over half of the homeless are between the ages of 25 and 54, while almost a quarter is 55 and over. African Americans make up the largest group of homeless individuals in the City (47%) followed by nearly equal numbers of white and Hispanic individuals (30% and 21% respectively). A significant portion of homeless persons often experience multiple health issues, trauma, and disability. Nearly one fifth are physically disabled and approximately one third are experiencing a mental illness. A fifth have substance abuse issues needing treatment. Over a third has experienced domestic violence.

Homelessness has been shown to be linked to dangerous human health conditions.[7] While some health problems can precede and/or contribute to persons becoming homeless, many health problems can arise as a consequence of homelessness. Because many people experiencing homelessness are unsheltered and do not have ready access to healthcare, homelessness has been shown to exacerbate preexisting health conditions and increase an individual's risk of developing health problems such as diseases of the extremities, skin disorders, malnutrition, parasitic infections, dental and periodontal disease, degenerative joint diseases, venereal diseases and infectious hepatitis related to intravenous drug use. Homelessness also increases the possibility of trauma, especially as a result of physical assault or rape. Conditions in many areas where homeless individuals reside pose additional risks. In 2017, several outbreaks of Hepatitis A were documented in communities throughout Southern California, leading the Governor to declare a statewide state of emergency. The California Department of Public Health reported that there were at least 600 documented cases of Hepatitis A since November 2016, including 420 hospitalizations and 21 deaths.[8] The outbreak was largely attributed to poor

---

6 Los Angeles Homeless Services Authority, Data and Reports, City of Los Angeles, 2016, https://documents.lahsa.org/Planning/homelesscount/2016/datasummaries/La_City.pdf

7 Institute of Medicine Committee on Health Care for Homeless People, "Homelessness, Health, and Human Needs," National Academies Press, 1988.

8 California Department of Public Health, Hepatitis A Outbreak in California, Weekly Update as of November 3, 2017, https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Immunization/Hepatitis-A-Outbreak.aspx

hygiene conditions and lack of access to sanitary restrooms among unsheltered homeless communities.

Although traditionally associated with the downtown area ('Skid Row'), multiple concentrations of homeless individuals are found in areas outside of downtown. This includes areas like Venice and Arroyo Seco Park, with lower density populations found in areas of the San Fernando Valley, Hollywood, and, South Los Angeles.

Types of Homeless Housing

It is important to distinguish between shelters and housing. Shelters provide temporary housing and safety for those living in public spaces, while housing is permanent. Shelters are a temporary option to begin the process of securing permanent housing, and providing a shelter space is not a solution in and of itself. Below are some descriptions for the types of shelters and housing for the homeless funded by the City and County.

Emergency Shelter. Emergency shelters provide a space, most commonly overnight, when one becomes homeless or otherwise experiences a housing crisis and has no other place to go. This is a time-limited intervention that federal HUD guidelines are deprioritizing in favor of permanent housing.

Winter Shelter. Winter Shelter (WS) provides a place to stay or bed to sleep in overnight if one becomes homeless or otherwise experiences a housing crisis and has no place to go. This type of shelter is typically limited to winter months for 90 days, usually from November 1 to February 28/29 in the City and County. As the City systematically addresses the needs of the homeless, temporary expansions in the shelter supply will be needed. When shelters are paired with a Bridge Housing model (discussed immediately below), supportive services and housing navigators help reduce the chance that homeless individuals fall back into street homelessness. Funding for shelters at the federal level is no longer prioritized by HUD. As Los Angeles works to reduce street homelessness over time, the need for shelters will contract accordingly.

Bridge Housing. Like the short-term shelter options, Bridge Housing provides an interim facility to homeless individuals or families to ensure they are not sleeping in the public space while they await permanent housing. Bridge Housing offers a stronger value proposition to homeless Angelenos through a one-on-one case management relationship that leverages personal trust and expertise to help a homeless person into permanent housing. Shelter alone does not offer this added level of assistance.

Permanent Supportive Housing (PSH). PSH is non time-limited housing with supportive services provided to assist homeless persons based on assessed need. People experiencing chronic homelessness often incur significant public costs – through emergency room visits, run-ins with law enforcement, incarceration, and access to existing poverty and homeless programs. Individuals placed in PSH typically do not incur these costs as they are provided with stable housing, contributing to PSH high retention rates of 90 percent and above, according to the Los Angeles Homeless Services Authority and the Conrad N. Hilton Foundation Chronic

Homelessness Initiative, effectively ending chronic homelessness in a cost-efficient manner. PSH has been prioritized by HUD in Super-NOFA funding.

Rapid Rehousing (RRH). RRH is time-limited housing provided to assist homeless persons with moderate to lower levels of assessed need. RRH is individualized and flexible. Services prevalent in PSH such as integrated mental health often involve employment assistance and other programs that reinforce financial independence for the individual or family once the RRH rental assistance ends. While it can be used for any homeless person, preliminary indications show that it can be particularly effective for households with children. Generally the time-limited amount of assistance averages around six months. RRH clients enter into lease agreements with landlords upon move-in. Once time-limited subsidies end, a formerly homeless tenant pays the full rate of the housing unit agreed upon in the lease. The tenant can continue living at the unit pursuant to agreement with the landlord, just like a standard rental contract.

Transitional Housing (TH). Transitional Housing is time-limited with a wide variety of housing periods lasting up to 24 months as defined by HUD, with averages of six to 13 months. Many TH programs place conditions on potential residents prior to move in. Requirements often involve mental counseling or sobriety. Though TH offers an important next step for many in their journey to housing, retention rates tend to be lower than RRH and PSH programs. HUD has deprioritized this type of housing in their Super-NOFA funding.

Housing Success

As a means to understand the needs to place the homeless population in permanent housing, **Table 1, Housing Success by Type** shows the average length of time a homeless individual or family stays in a shelter before moving on to a different form of housing assistance.

According to the City's Comprehensive Homeless Strategy,[9] historically, housing strategies, such as emergency shelter and TH, have fallen short of effectively serving the chronically homeless, as their limited time horizons hamper individuals from gaining a permanent foothold in housing and alleviating the medical and social problems they face. As a result, the chronically homeless have not retained spots in permanent housing upon exiting shelter or TH.

The key difference in PSH is that if a client is not ready to exit to permanent housing without services, they remain in PSH and register as permanently housed. Additionally, PSH does not maintain prerequisites such as sobriety. This difference has proven successful in keeping the chronically homeless off the streets, as it allows individuals to function without facing a prescribed exit date. In shelter and TH, this exit date sometimes discourages the chronically homeless from entering in the first place, or results in the individual leaving before their stay is up. **Table 2, Retention Rates for Chronically Homeless (CH) in Permanent Housing**, below

9 Comprehensive Homeless Strategy, City of Los Angeles, 2015 http://clkrep.lacity.org/onlinedocs/2015/15-1138-S1_misc_1-7-16.pdf

shows the proportion of families and individuals remaining permanently housed both six months and one year after having entered into a PSH program.

Table 1
Housing Success by Type

Program	Length of Shelter Stay (days)	Length of Program Stay (months)
Prevention	N/A/a/	1
Shelter Only	N/A	1
Transitional Housing	60	6-13
Rapid Re-Housing	90	6
Permanent Supportive Housing (from shelter)	90	N/A/b/

Source: City of Los Angeles, Comprehensive Homeless Strategy, 2016

/a/ Prevention and Shelter Only programs do not include shelter stays prior to program entrance. If an individual or family is enrolled in Prevention, the services they receive are meant to prevent them from ever having to enter shelter. If an individual or family is enrolled in a Shelter Only program, then no shelter stay prior to enrollment exists because they are coming from a situation where they were either previously housed or living on the streets

/b/ Permanent Supportive Housing, on average, includes a 90 day stay in shelter before an individual or family is enrolled. The reason there is no applicable length of program stay in PSH is that it is a permanent and, therefore, on-going housing outcome.

Table 2
Retention Rates for Chronically Homeless (CH) in Permanent Supportive Housing (PSH)

	2011 Households		2012 Households		2013 Households		2014 Households	
	With children	Without children	With children	Without children	With children	Without children	With children	Without children
Total CH served by PSH	8	596	38	839	37	944	44	1033
6-month retention rate	88%	90%	100%	92%	100%	95%	100%	96%
1-year retention rate	88%	84%	100%	86%	92%	89%	100%	90%

Source: City of Los Angeles Comprehensive Homeless Strategy, 2016

With most years showing retention rates of 85 percent or higher for individuals and families, the data supports the conclusion that PSH is the best avenue for ending chronic homelessness. Although individuals are slightly less likely to remain permanently housed (permanent or PSH) at each time interval, they are more likely to exit PSH for traditional permanent housing than households with children. Furthermore, the small percentage of those not retaining a permanent housing outcome does not necessarily mean that they have returned to the streets or

shelter. Some may find a permanent living situation with a friend or family; however, most of the time, members of this group are shown as not retaining permanent housing because they leave without communicating where they are going or because the PSH provider is unable to confirm that they moved on to other housing. According to LAHSA and the Conrad N. Hilton Foundation's Chronic Homelessness Initiative,[10] increasing numbers of chronically homeless in PSH from year to year show that the strategy has been strongly embraced as the best practice for serving this subpopulation.

History of PSH Projects

Currently, the City maintains approximately 7,960 PSH units. Between 2008 and 2016, 2,398 PSH units (approximately 300 units per year) were constructed in the City in 47 individual projects (approximately six projects per year, and an average size of 44 units).

In an effort to understand the types of projects that could occur in the future, the City undertook an evaluation of the types of PSH projects that have occurred. For the purposes of this analysis, the City considered projects completed after 2008, in order to study projects completed in a similar regulatory environment as exists today.[11] **Table 3, Permanent Supportive Housing Units Completed Since 2008 to 2016,** shows the number of units and their general characteristics. **Figure 3, PSH Project Locations**, shows the general location of the PSH projects. As shown in the figure, while many of the PSH projects are located in or near Downtown, PSH units have been built throughout the City.

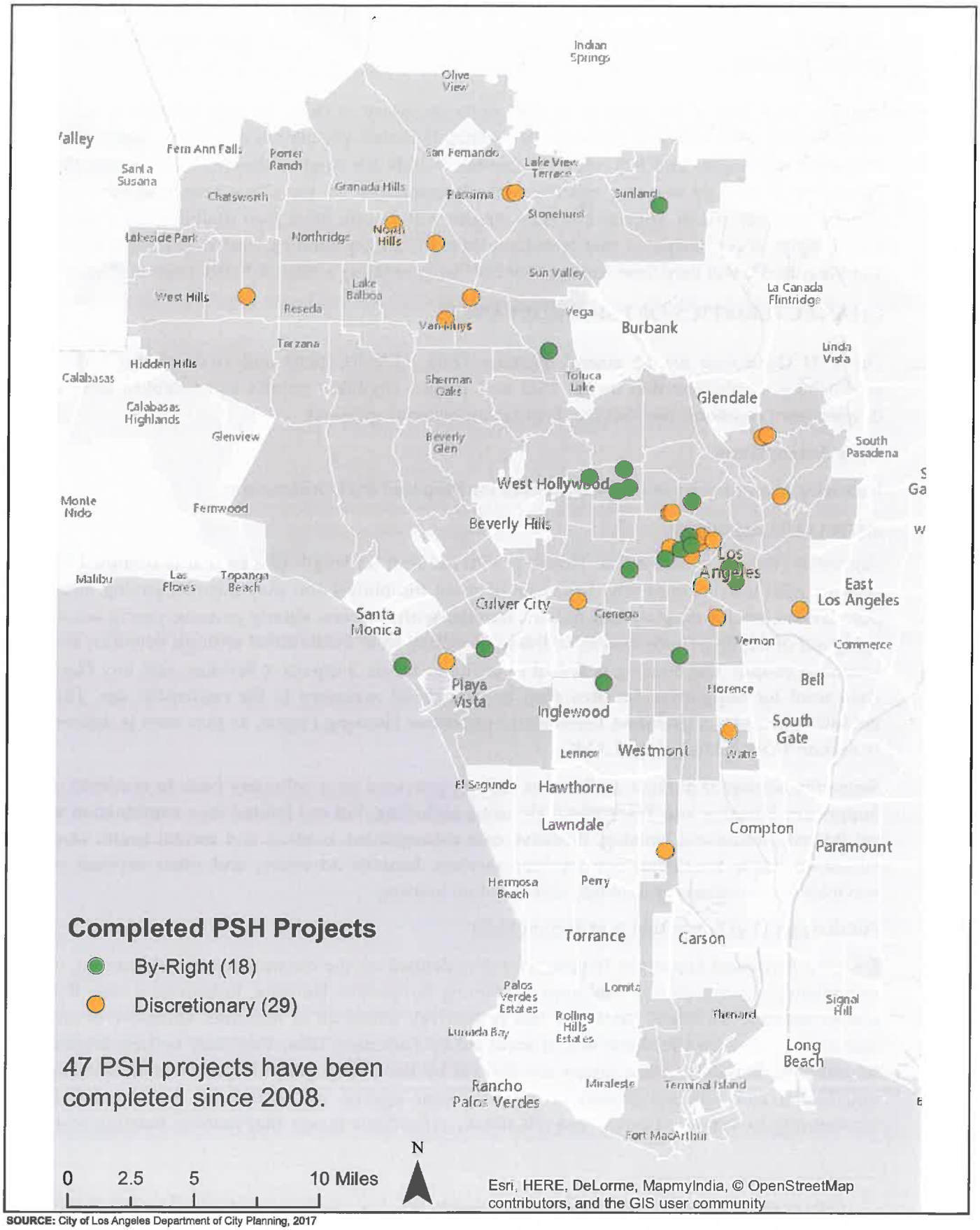
Table 3
Permanent Supportive Housing Units Completed Between 2008 and 2016

	Discretionary Projects		Ministerial Projects		All Projects	
	Total	Percent	Total	Percent	Total	Percent
Projects	25	61%	16	39%	41	100%
Rehab	3	25%	9	22%	12	29%
New Construction	22	54%	7	17%	29	71%
Total Units	1,623	68%	775	32%	2,398	100%

Source: City of Los Angeles, Department of City Planning, 2017

10 Conrad N. Hilton Foundation Chronic Homelessness Initiative Phase I Final Report, October 2016 https://hilton-production.s3.amazonaws.com/documents/255/attachments/Chronic_Homelessness_Report_2016_FINAL.pdf?1476817070

11 The City's Density Bonus Ordinance was adopted in 2008 (LAMC 12.22 A.25). This is the most common entitlement pathway for PSH Projects.



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE 3

IMPACT SCIENCES

Current PSH Project Locations, Projects Completed 2008 to 2016

1264.008-03/17

The City estimates of the number of PSH units necessary to close the gap between what is available and what is needed to house the existing homeless population is approximately 9,050 PSH units for singles and 845 units for families.[12] PSH for single individuals represents the highest need the City is facing relative to the housing gap for the City's homeless. Housing current numbers of Los Angeles homeless singles will require more than doubling the current PSH supply. It is anticipated that recently-adopted local gap-funding sources (Measure HHH and Measure H) will help meet the need for PSH by generating a total of 10,000 units of PSH.

CHARACTERISTICS OF PSH ORDINANCE

The PSH Ordinance would amend Sections 12.03, 12.04.09, 14.00 and 16.05 of the LAMC establishing regulations that define PSH and project eligibility criteria and establish unique development standards for PSH that facilitate ministerial approval.

Code Amendments

Following is a summary of the provisions of the Proposed PSH Ordinance.

Section 12.03 Definitions

Supportive Housing is defined as: Housing with no limit on length of stay that is occupied by persons with low incomes who have one or more disabilities and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people. The housing is linked to onsite or offsite Supportive Services, and any Floor Area used for Supportive Services shall be considered accessory to the residential use. This definition includes a Qualified Permanent Supportive Housing Project, as that term is defined in Section 14.00 A.11(a) of the LAMC.

Supportive Services is defined as: Services that are provided on a voluntary basis to residents of Supportive Housing and Transitional Housing, including, but not limited to, a combination of subsidized, permanent housing, intensive case management, medical and mental health care, substance abuse treatment, employment services, benefits advocacy, and other services or service referrals necessary to obtain and maintain housing.

Subdivision 11 of Subsection A of Section 14.00

Qualified Permanent Supportive Housing Project is defined as: the construction of, addition to, or remodeling of a building or buildings containing Supportive Housing, located in a zone that allows multiple dwellings (RD1.5 or less restrictive), where all of the units, exclusive of any manager's units, are affordable to and occupied by Extremely Low, Very Low or Low Income households, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD) or any successor agency, as verified by the Housing & Community Investment Department (HCIDLA). Affordable means that rents or housing costs

---

12 Comprehensive Homeless Strategy, City of Los Angeles, 2015 http://clkrep.lacity.org/onlinedocs/2015/15-1138-S1_misc_1-7-16.pdf

cannot to the tenant exceed 30 percent of the maximum gross income of each respective household income group. A minimum of fifty (50) percent of the total units must be occupied by the *Target Population*.

Target Population is defined as: Persons with qualifying lower incomes who:

(i) Have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, and are homeless as defined by any Los Angeles City, Los Angeles County, State of California, or Federal guidelines; or

(ii) Are chronically homeless, as defined by any Los Angeles City, Los Angeles County, State of California, or Federal guidelines.

Application and Approval. Procedures for Qualified Permanent Supportive Housing Projects are established as:

The process whereby the applicant shall submit an application on a form developed by the Department of City Planning (DCP) that contains basic information about the project, the owner and/or applicant and conformance with this section. The Director of Planning shall review all applications for compliance with the definitions, requirements, zoning compliance, and adherence to the performance standards. The application shall be approved by the Director of Planning through a ministerial Public Benefit process if the eligibility criteria and performance standards are met.

Projects utilizing other affordable housing incentive programs would not be eligible for this application and approval process. For projects requesting additional waivers of development standards that would otherwise physically preclude the construction of the Qualified Permanent Supportive Housing Project, the discretionary application procedures in Section 12.22 A.25(g)(3) of the LAMC would apply.

Requirements. A Qualified Permanent Supportive Housing project must comply with the following requirements:

(1) *Supportive Services.* Projects shall provide documentation that describes the level and types of services that will be provided onsite and/or offsite. Prior to project approval, the application shall provide a signed funding commitment letter from a local public agency, verifying that the Supportive Services will be provided.

(2) *Affordable Housing Covenant.* Projects shall record a covenant acceptable to the Housing and Community Investment Department (HCIDLA) that reserves and maintains the number of dwelling units designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy by the Department of Building and Safety.

(3) *Housing Replacement.* Projects shall meet any applicable dwelling unit replacement requirements of California Government Code Section 65915(c)(3), as verified by the Housing and Community Investment Department (HCIDLA) prior to the issuance of any building permit.

(4) *Public Notification.* Applicants shall be required to provide the following public notice of the application:

(i) Provide written notice of the application to the abutting property owners and the Council District Office with jurisdiction over the site; and

(ii) Post a public notice of the project application on the project site.

Bonuses and Incentives

Qualified Permanent Supportive Housing Projects complying with the requirements and performance standards provided in the ordinance would be eligible for the following bonuses and incentives:

(1) *Minimum Area per Dwelling Unit or Guest Room.* In any zone which permits multiple dwelling uses (RD1.5 and less restrictive), the number of allowable dwelling units or guest rooms shall not be subject to the otherwise maximum allowable residential density under any applicable zoning ordinance and/or specific plan, except in the RD1.5 Zone, where the minimum lot area per dwelling unit shall be 500 square feet (3 times increase from current residential density limit in that Zone).

(2) *Automobile Parking Requirements.* Up to 40 percent of the total required parking may be provided by compact stalls.

(i) No parking spaces shall be required for dwelling units or guest rooms restricted to the *Target Population.*

(ii) For Qualified Permanent Supportive Housing projects located within ½ mile of a Transit Stop, no more than ½ parking space (including spaces allocated for guest parking) shall be required for each income restricted dwelling unit or guest room not occupied by the *Target Population.* Otherwise no more than one parking space (including spaces allocated for guest parking) shall be required for each income-restricted dwelling unit or guest room not occupied by the *Target Population.*

(iii) One parking space for every 20 dwelling units and/or guest rooms shall be required for the purpose of accommodating supportive services and case management.

(3) *Floor Area.* Areas to be used for supportive services, public area accessible to all residents, and any unenclosed areas of a building are not considered in the total allowable floor area calculation.

(4) *Residential Hotel Conversion.* Conversion of Residential Hotels (subject to the Hotel Unit Conversion and Demolition Ordinance LAMC Section 47.70 et seq.) to PSH housing shall be permitted, notwithstanding the use provisions of the underling zoning.

Additional Concessions and Incentives

Qualified PSH projects shall also be eligible for up to four concessions or incentives described in the proposed ordinance, including:

(1) *Yard/Setback.* Up to 20% decrease in the required width or depth of any individual yard or setback except along any property line that abuts an R1 or more restrictively zoned property.

(2) *Lot Coverage.* Up to 20% decrease in lot coverage limits.

(3) *Floor Area Ratio.*

(i) Up to 35% increase in the allowable Floor Area Ratio; or

(ii) In lieu of the otherwise applicable Floor Area Ratio, a Floor Area Ratio not to exceed 3: 1, provided the parcel is in a commercial zone.

(4) *Height.* Up to 35% increase in the height requirement in feet, applicable over the entire parcel regardless of the number of underlying height limits.

(i) In any zone in which the height or number of stories is limited, this height increase shall permit a maximum of one additional story up to eleven feet.

(ii) When adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45 degree angle as measured from a point 25 feet above grade at the property line.

(5) *Open Space.* Up to 20% decrease from an open space requirement.

(6) *Common Open Space.* Recreation rooms at least 600 square feet in area for a development of 16 or more dwelling units or guest rooms, or at least 400 square feet in area for a development of fewer than 16 dwelling units or guest rooms, may qualify as common open space, but shall not qualify for more than 40 percent of the total required usable open space.

(7) *Averaging of Floor Area Ratio, Parking or Open Space, and permitting Vehicular Access.* A project that is located on two or more contiguous parcels may average the floor area, open space and parking over the project site, and permit vehicular access through a more restrictive zone to a less restrictive zone, provided that:

(i) The proposed use is permitted by the underlying zone(s) of each parcel; and

(ii) No further lot line adjustment or any other action that may cause the Project site to be subdivided subsequent to this grant shall be permitted.

(8) *Ground Floor Use.* Where nonresidential floor area is required by the DCP in a zoning ordinance, Specific Plan, Community Plan, Pedestrian Overlay Zone or other set of development standards, that requirement may be satisfied by any active ground floor use such as community rooms, resident amenities, supportive service areas, and common open space.

(9) *Other Development Standard.* Up to a 20% relief may be provided from one other development standard not described in this section, as that term is defined in California Government Code Section 65915(o)(1).

Performance Standards

The following Performance Standard requirements would also apply to all Qualified Permanent Supportive Housing Projects:

(1) *Location.* Projects would be required to be located in a High Quality Transit Area (HQTA), as identified in the current Regional Transportation Plan (RTP/SCS).

(2) *Resident Amenities.* Projects would be required to provide the following amenities:

(i) All units must include a private bathroom and cooking facilities; and

(ii) Physical space must be provided to accommodate on-site supportive services at a minimum ratio of 90 square feet of dedicated case management office space for projects with 20 or fewer units, or three percent of the total residential floor area for projects with greater than 20 units.

(3) *Design Standards.* Additional urban design requirements related to building façade transparency, building orientation, massing, landscaping, and security lighting would also apply.

Construction Standards

Individual development projects are required to adhere to the following additional performance standards. These standards are based on the Mitigation Measures identified in the analysis below.

(i) No pile driving will be allowed unless required by geological conditions; where piles are needed, they shall use quiet techniques such as vibratory piles;

(ii) Where excavating below previously excavated depths, the project shall require monitoring by a qualified archeologist and/or paleontologist if any fossil remains are found at the project site;

(iii) Where past use indicates potential for contamination, Phase I and, as needed Phase II Environmental Site Assessments shall be prepared. Applicants shall consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination; and

(iv) Where excavation could extend below previously disturbed levels, notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site, if the Tribe has submitted to the Department of City Planning a request in writing to be notified of proposed projects in that area and monitoring may be required if needed.

(v) The Qualified Permanent Supportive Housing shall not involve a historical resource as defined by Public Resources Code Section 21084.1 as determined by the Director, in consultation with the Office of Historic Resources.

Projects that cannot comply with these requirements would be required to utilize the discretionary alternative compliance procedures in Section 14.00 B of the LAMC, and would not be eligible for the administrative clearance application provided in Section 14.00 A.11.

Amendment to Section 12.04.09 "PF" Public Facilities Zone

The project would add to Section 12.04.09 a provision to allow the uses and standards of the least restrictive adjoining zoning to be applied for joint public and private PSH projects located in the "PF" Public Facilities Zone and developed in accordance with Section 14.00 A.11.

Amendment to Section 16.05 D Site Plan Review

An amendment is proposed to Section 16.05 D of the LAMC to provide an exemption from otherwise applicable Site Plan Review procedures for Qualified Permanent Supportive Housing Projects with fewer than 120 units (fewer than 200 units if located in the Greater Downtown Housing Incentive Area) and developed pursuant to the requirements and procedures in Section 14.00 A.11 of the LAMC.

Methodology and Assumptions

Methodology

As discussed above, on November 8, 2016, voters in the City of Los Angeles approved Measure HHH, which along with other previously approved gap-funding projects, will fund 10,000 PSH units (up to 20 percent of units may be affordable for those at risk of becoming homeless). The PSH Ordinance would streamline the development process for PSH units including streamlining the environmental review process, expediting the permit process and by removing zoning hurdles. The PSH Ordinance could reasonably foreseeably, with the most generous (and conservative) assumptions, result in approximately 200 units in addition to the 1,000 a year units anticipated to result from the previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance, the City is analyzing impacts of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 units or 1,000 units per year for the next 10 years is assumed to be part of cumulative development in the impact analysis.

The City's method to estimate the 200 units a year potentially resulting from the PSH Ordinance is consistent with CEQA legal decisions that recognize that a City is not required to reanalyze the effect of ordinances or other projects that are already approved and are not being amended or are intended to be amended with the project. See, e.g., *Black Property Owners Assn. v. City of Berkeley* (1984) 22 Cal.App.4th 974, 985 (holding that a city was not required to analyze the effects of a rent control ordinance in its update to its housing element where there were no changes proposed to its rent control laws). Again, Measure HHH, along with other previously approved cumulative gap-funding projects, are existing projects that will foreseeably result in the construction of up to 1,000 units a year for the next 10 years. (See discussion above related to historical construction of 300 PSH units a year and cumulative impact discussion for analysis of these cumulative gap-funding projects.) Additionally, the City is not modifying its existing land use plans and is making limited amendments to its zoning ordinance to in substantial part eliminate discretionary review for most PSH projects and otherwise, facilitate the ability to construct PSH projects on PF zoned property and potentially larger PSH projects. As discussed, PSH projects are dependent on gap-funding and although the City may be modifying some of

the allowed density restrictions (i.e. minimum lot area per du or guest room), the number of PSH units is not expected to go beyond the additional 200 units. Additionally, while PSH developments may be slightly larger, historical development of PSH projects demonstrates that applicants prefer smaller projects. The reasonably foreseeable result of these amendments is to potentially obtain larger PSH projects and up to 200 additional units, as explained above.

Analytic Assumptions

As discussed above, the PSH Ordinance is expected to result in 200 units a year for 10 years. Additionally, the particular terms of the PSH Ordinance would reasonably be expected to result in the following development patterns and development parameters.

Potential PSH Sites

A map of all eligible PSH parcels is shown in **Figure 4 PSH Eligible Parcels**. Based on review of past PSH projects, the City has identified the following types of sites and land uses as Potential PSH Sites under the PSH Ordinance:

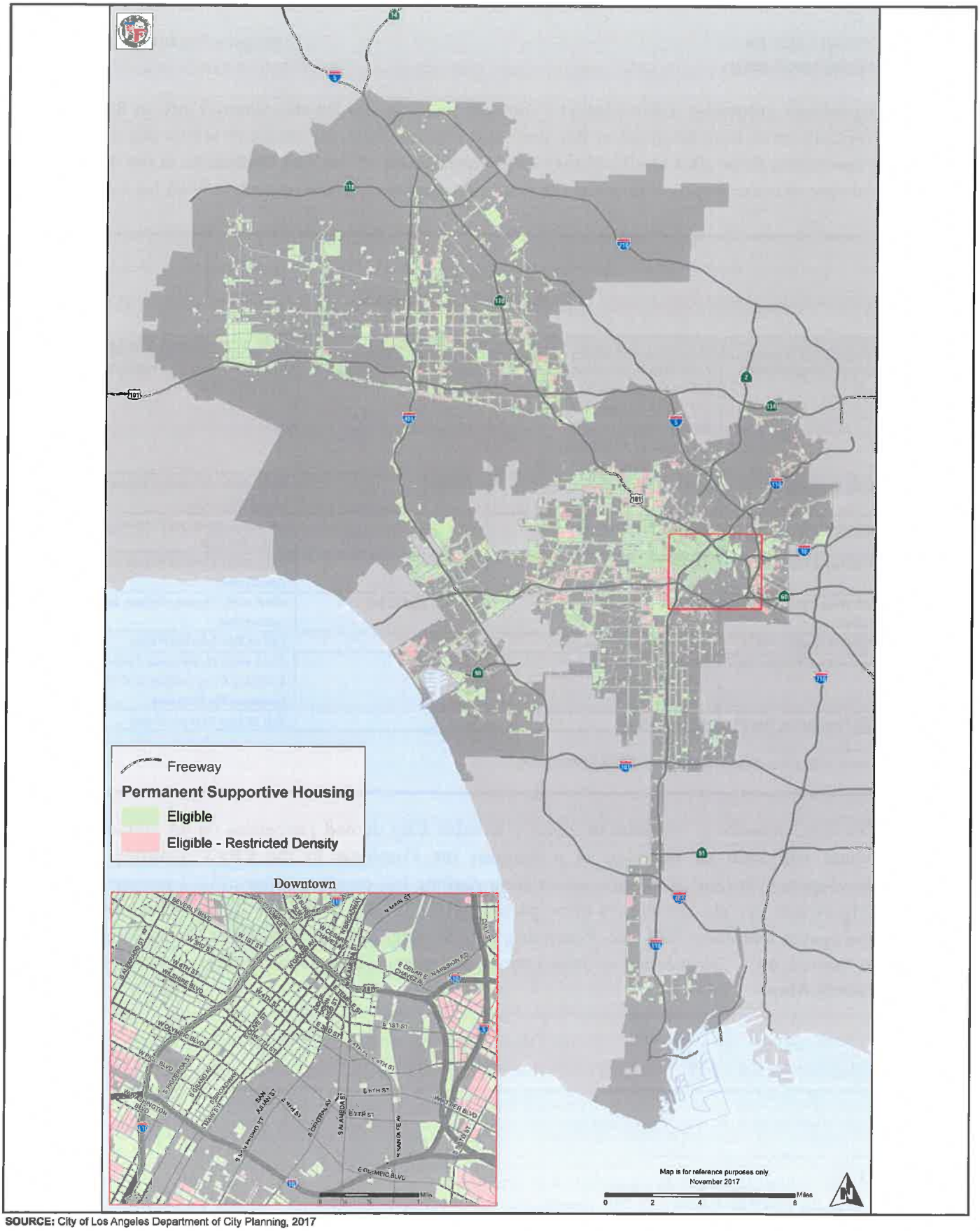
Sites Zoned for Multiple Dwelling Use and located in a High Quality Transit Area

PSH projects could occur on available sites throughout the City as allowed by zoning; therefore, this document does not assume any specific site for development, other than the PSH Ordinance requires that sites be located in HQTAs. This requirement has to do with the limited mobility of the PSH population; many residents would not have cars and would be transit dependent, in addition to the requirement that Qualified PSH Projects are located in a HQTA. For this reason, proximity to transit is essential for daily activities.

PSH Projects are expected to occur on sites throughout the City; however the City has identified several key opportunity sites which may be suitable for PSH projects.

City-Owned Properties and PF Zones

The Office of the City Administrative Officer (CAO) launched in 2016 an Affordable Housing Opportunity Site (AHOS) initiative to solicit proposals for affordable housing, and PSH developments and other types of homeless housing discussed above on City-owned properties. In the first year of the program, the City solicited development proposals (RFQ/P) for eight City owned properties that could be suitable for affordable housing and/or PSH projects. Based on the development proposals received, the City Council approved a prequalified list of 39 developers and entered into Exclusive Negotiating Agreements (ENA) with developers for four project sites (Council File No. 16-0600-S145). For the remaining project sites, the City intends to either issue a subsequent Request for Proposals to the prequalified list of developers, or



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE **4**

IMPACT SCIENCES

PSH Eligible Parcels

1264.008-11/17

dispose/sell properties at Fair Market Value (see **Table 4**). For the sites entered into an ENA, no proposals have been finalized at this time and it is not clear the extent to which any projects proposed for those sites would qualify for the provisions of the PSH Ordinance as the number and type of units proposed may change pending negotiation of the respective ENA for each site.

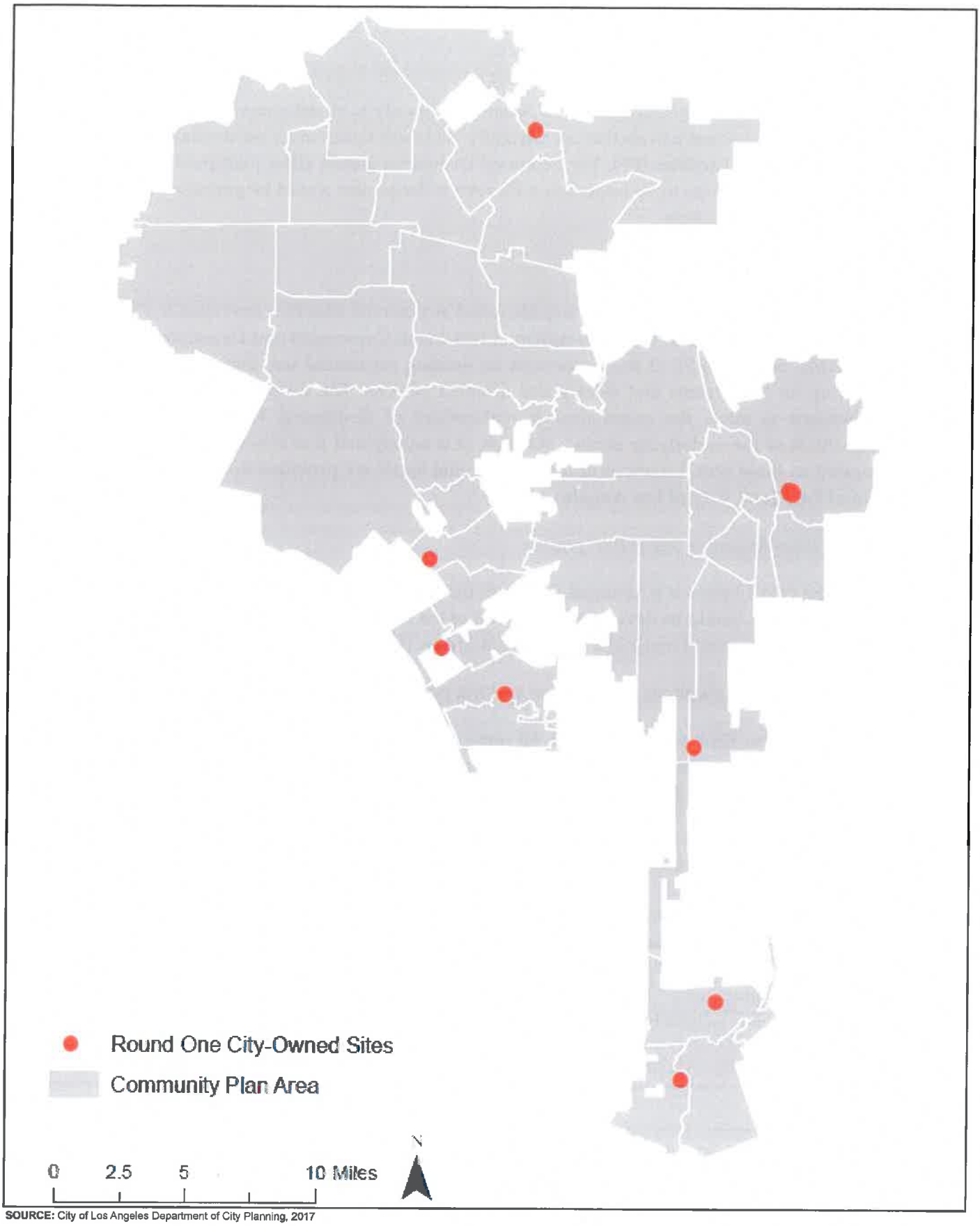
Table 4
AHOS Round One Properties

Site	Address	Zone(s)	Site Disposition
Lincoln Heights DOT Lots	2332-2340 N. Workman 216-224 S. Avenue 24 2331-2337 N. Workman and 2330-2338 N. Daly 2416-2422 N. Workman 154-164 S. Avenue 24	[Q]C4-1XL-CDO and PF-1-CDO	Issue a Request for Proposals to Pre-Qualified List
Hillside Parcel	11681 W. Foothill Blvd.	(T)RD2-1	ENA with LA Family Housing and Many Mansions
Imperial Lot	283 W. Imperial Highway	C2-1	Issue a Request for Proposals to Pre-Qualified List
Thatcher Yard	3233 S. Thatcher Ave.	(Q)PF-1XL	ENA with Thomas Safran and Associates
Old West LA Animal Shelter	11950 W. Missouri Ave.	PF-1XL and M2-1	ENA with Thomas Safran and Associates
Old Fire Station No. 5	6621 W. Manchester Ave.	R1-1	Sell at Fair Market Value
Venice Dell Pacific Site	200 E. Venice Blvd.	OS-1XL-O	ENA with Hollywood Community Housing Corporation and Venice Community Housing
Old Fire Station No. 53	438 N. Mesa St.	R2-1XL	Sell at Fair Market Value

Source: City of Los Angeles, Department of City Planning, 2017

The CAO intends to continue to identify suitable City owned properties on an annual basis, which will then be included in a Request for Proposals to the City's qualified list of developers.[13] Several of the sites are existing parking lots or other underutilized properties. For City-owned parcels, developers often partner with the City in order to facilitate development and ensure long-term PSH use. Partnering with the City reduces costs, and allows PSH projects to "pencil-out." The location of these City-owned properties is shown in **Figure 5 City Owned Parcels Map**.

13 The City anticipates releasing no more than approximately 20 sites per year; this list is used as a representation of the potential locations of PSH projects, but development of PSH projects on these sites is not considered certain.



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE 5

IMPACT SCIENCES

City Owned Parcels Map

1264.008•11/17

Of these sites, the Proposed Ordinance would apply only to development of a Qualified PSH Project on City-owned parcels that are currently zoned for multifamily residential use, or which are zoned Public Facilities (PF). The Proposed Ordinance would allow joint public and private Qualified PSH projects to be located in a PF zone if the project would be permitted by the least restrictive adjoining zone.

Conversion of Residential Hotels

Residential Hotels are also preliminary identified as potential sites for conversion to PSH. These Residential Hotels (subject to the Residential Hotel Unit Conversion and Demolition Ordinance in LAMC Section 47.70 et seq.) represent an existing residential use that generally provides housing for low income and elderly and disabled persons. The Proposed Ordinance includes provisions to allow the conversion or replacement of Residential Hotels to PSH projects, regardless of the underlying zoning. As such, it is anticipated that some PSH Projects may be located on these sites. Locations of these residential hotels are provided in **Figure 6 Residential Hotel Locations, City of Los Angeles**.

Assumptions Regarding Size of PSH projects

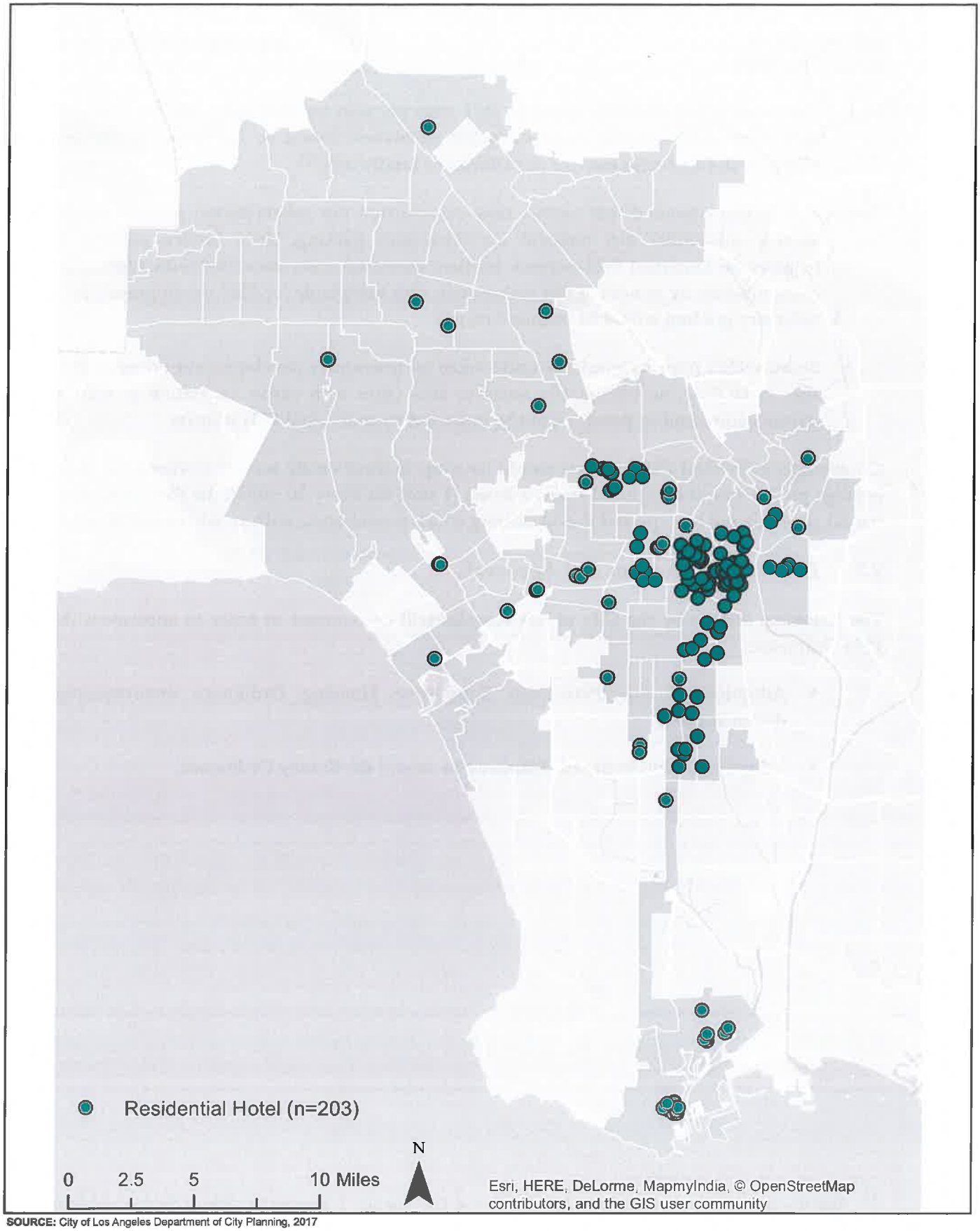
Over the next 10 years it is assumed that, with the proposed PSH ordinance, 2,000 (200 per year) new PSH units would be developed as a result of the Project. Units developed as a result of the PSH Ordinance would occur in a combination of new (i.e., ground up) and rehabilitation.

The following assumptions are based on existing patterns of development of PSH units:

- Current PSH projects average 60 units per project; however, it is anticipated that the PSH Ordinance will result in slightly larger projects than the City has historically seen, approximately 75 units per project.
- On an annual basis, approximately 71 percent of all PSH projects would be new construction and 29 percent of all projects would be rehabilitation of existing structures.
- The PSH Ordinance requires a minimum of 50 percent of the total units as PSH. However, based on existing projects and Measure H and HHH funding allowance, it is assumed that 85% of the units would be PSH units (with a unit size of approximately 200 square feet)[14] and 15% of units would be affordable for families at risk of becoming homeless (with a unit size of approximately 1,000 square feet).

---

14 Unit size of 200 square feet based on California Tax Credit Allocation Committee Regulations Implementing The Federal And State Low Income Housing Tax Credit Laws; California Code Of Regulations; Title 4, Division 17, Chapter 1; May 17, 2017 http://www.treasurer.ca.gov/ctcac/programreg/2017/20170517/clean.pdf page 66 minimum of 200 square feet for special needs projects



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE 6

IMPACT SCIENCES

Residential Hotel Locations, City of Los Angeles

1264.008•05/17

- Peak hour trip generation would be 0.12 trips per unit for PSH units and 0.5 trips per unit for affordable family units; daily trip generation would be 1.27 trips per day per PSH unit and 4.08 trips per day per affordable family unit.[15]

- It is further assumed that neither new construction nor rehabilitation projects would involve substantial dirt removal for subsurface parking, since limited parking is required for Qualified PSH projects. Further, increased costs associated with addressing contamination by removing dirt makes such sites unsuitable for PSH development. Any necessary grading would be balanced on site.

- Because PSH projects would be undertaken on previously developed but underutilized sites in HQTAs, no biologically sensitive sites (sites with native vegetation or natural stream course and/or pond) would be impacted by individual PSH projects.

On average, individual PSH projects would have up to three onsite service workers, based on average project size and required staffing levels (1 staff for every 20 units); the PSH Ordinance would generally not be expected to add staffing which would occur with an additional 20 units.

2.7 Discretionary Actions and Approvals

The following actions by the City of Los Angeles will be required in order to implement the PSH Ordinance:

- Adoption of this Permanent Supportive Housing Ordinance environmental document, and

- Adoption of the Proposed Ordinance to amend the Zoning Ordinance.

15 This trip generation rate from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016.

III. INITIAL STUDY CHECKLIST

Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

a. Earlier Analysis Used. Identify and state where they are available for review.

b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9. The explanation of each issue should identify:

a. The significance criteria or threshold, if any, used to evaluate each question; and

b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

❑ AESTHETICS	❑ GREENHOUSE GAS EMISSIONS	❑ POPULATION AND HOUSING
❑ AGRICULTURE AND FOREST RESOURCES	❑ HAZARDS AND HAZARDOUS MATERIALS	❑ PUBLIC SERVICES
❑ AIR QUALITY	❑HYDROLOGY AND WATER QUALITY	❑ RECREATION
❑ BIOLOGICAL RESOURCES	❑ LAND USE AND PLANNING	❑ TRANSPORTATION AND TRAFFIC
❑ CULTURAL RESOURCES	❑ MINERAL RESOURCES	❑ TRIBAL CULTURAL RESOURCES
❑ ENERGY	❑ NOISE	❑ UTILITIES
❑ GEOLOGY AND SOILS		❑ MANDATORY FINDINGS OF SIGNIFICANCE

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

PROPONENT NAME:
City of Los Angeles Department of City Planning

PHONE NUMBER:
213-978-1643

PROPONENTADDRESS:
200 N. Spring St., Room 278
Los Angeles, CA 90012

AGENCY REQUIRING CHECKLIST:
City of Los Angeles Department of City Planning

DATE:
November 16, 2017

PROPOSAL NAME (If Applicable):
Permanent Supportive Housing Ordinance

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS**				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	☐	☐	☒	☐
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	☐	☐	☐	☒
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	☐	☐	☒	☐
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	☐	☐	☒	☐
II.	**AGRICULTURE AND FOREST RESOURCES**				
a.	CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?	☐	☐	☐	☒
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	☐	☐	☐	☒
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	☐	☐	☐	☒
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	☐	☐	☐	☒
e.	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?	☐	☐	☐	☒
III.	**AIR QUALITY**				
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	☐	☐	☒	☐
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	☐	☐	☒	☐
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	☐	☐	☒	☐
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	☐	☐	☒	☐
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	☐	☐	☒	☐

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.	**BIOLOGICAL RESOURCES**				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE ?	☐	☐	☒	☐
b.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	☐	☐	☐	☒
c.	HAVE 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?	☐	☐	☐	☒
d.	INTERFERE 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?	☐	☐	☒	☐
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	☐	☐	☒	☐
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	☐	☐	☐	☒
V.	**CULTURAL RESOURCES**				
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	☐	☒	☐	☐
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	☐	☒	☐	☐
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	☐	☒	☐	☐
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	☐	☐	☒	☐
VI.	**GEOLOGY AND SOILS**				
a.	EXPOSURE OF 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	☐	☐	☐	☒

	WOULD THE PROJECT:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?	☐	☐	☐	☒
iv.	LANDSLIDES?	☐	☐	☐	☒
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 POTENTIAL RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE?	☐	☐	☐	☒
d.	BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY?	☐	☐	☐	☒
e.	HAVE 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?	☐	☐	☐	☒
VII.	**GREENHOUSE GAS EMISSIONS**				
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	☐	☐	☒	☐
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	☐	☐	☒	☐
VIII.	**HAZARDS AND HAZARDOUS MATERIALS**				
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?	☐	☐	☒	☐
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	☐	☒	☐	☐
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 THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?				
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	☐	☐	☐	☒
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	☐	☐	☒	☐
h.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	☐	☐	☒	☐
IX.	**HYDROLOGY AND WATER QUALITY**				
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	☐	☐	☒	☐
b.	SUBSTANTIALLY DEPLETE GROUNDWATER SUPPLIES OR INTERFERE 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 PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	☐	☐	☒	☐
c.	SUBSTANTIALLY 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 SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	☐	☐	☒	☐
d.	SUBSTANTIALLY 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 AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	☐	☐	☒	☐
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	☐	☐	☒	☐
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	☐	☐	☒	☐
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	☐	☐	☐	☒
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	☐	☐	☐	☒

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	☐	☐	☐	☒
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	☐	☐	☐	☒
X.	**LAND USE AND PLANNING**				
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	☐	☐	☐	☒
b.	CONFLICT WITH 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, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	☐	☐	☐	☒
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	☐	☐	☐	☒
XI.	**MINERAL RESOURCES**				
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	☐	☐	☐	☒
b.	RESULT IN 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?	☐	☐	☐	☒
XII.	**NOISE**				
a.	EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?	☐	☐	☐	☒
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	☐	☒	☐	☐
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	☐	☐	☒	☐
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	☐	☐	☒	☐
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 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, EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	☐	☐	☐	☒
XIII.	**POPULATION AND HOUSING**				
a.	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)?	☐	☐	☒	☐

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	☐	☐	☐	☒
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	☐	☐	☐	☒
XIV. PUBLIC SERVICES					
a.	FIRE PROTECTION?	☐	☐	☒	☐
b.	POLICE PROTECTION?	☐	☐	☒	☐
c.	SCHOOLS?	☐	☐	☒	☐
d.	PARKS?	☐	☐	☒	☐
e.	OTHER PUBLIC FACILITIES?	☐	☐	☒	☐
XV. RECREATION					
a.	WOULD THE PROJECT 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?	☐	☐	☒	☐
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	☐	☐	☒	☐
XVI. TRANSPORTATION/CIRCULATION					
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?	☐	☐	☒	☐
c.	RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	☐	☐	☐	☒
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	☐	☐	☐	☒
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	☐	☐	☒	☐
f.	CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	☐	☐	☐	☒

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES					
a.	BE LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCE CODE SECTION 5020.1(K)?	☐	☒	☐	☐
b.	BE A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1? IN APPLYING THE CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE.	☐	☒	☐	☐
XVIII. UTILITIES					
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	☐	☐	☒	☐
b.	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.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	☐	☐	☒	☐
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	☐	☐	☒	☐
e.	RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?	☐	☐	☒	☐
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	☐	☐	☒	☐
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	☐	☐	☐	☒
XIX. MANDATORY FINDINGS OF SIGNIFICANCE					
a.	DOES THE PROJECT HAVE THE POTENTIAL TO DEGRADE THE QUALITY OF THE ENVIRONMENT, SUBSTANTIALLY REDUCE THE HABITAT OF FISH OR WILDLIFE SPECIES, CAUSE A FISH OR WILDLIFE POPULATION TO DROP BELOW SELF-SUSTAINING LEVELS, THREATEN TO ELIMINATE A PLANT OR ANIMAL COMMUNITY, REDUCE THE NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	☐	☐	☒	☐
b.	DOES THE PROJECT HAVE IMPACTS WHICH ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY CONSIDERABLE?	☐	☐	☐	☒

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	("CUMULATIVELY CONSIDERABLE" MEANS THAT THE INCREMENTAL EFFECTS OF AN INDIVIDUAL PROJECT ARE CONSIDERABLE WHEN VIEWED IN CONNECTION WITH THE EFFECTS OF PAST PROJECTS, THE EFFECTS OF OTHER CURRENT PROJECTS, AND THE EFFECTS OF PROBABLE FUTURE PROJECTS).				
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	☐	☐	☒	☐

DISCUSSION OF THE ENVIRONMENTAL EVALUATION

The Environmental Impact Assessment includes the use of City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, Geology, etc.). Impact evaluations are based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigations, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the City's Proposed Ordinance and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with CEQA and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts.

The proposed Project as identified in the Project Description, with required mitigation imposed, will not cause potentially significant impacts on the environment. Therefore, this environmental analysis concludes that an Environmental Impact Report is not necessary.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the Department of City Planning, City Hall, 200 N Spring Street, Room 750.

For City information, addresses, and phone numbers: visit the Environmental Review Unit, Room 750, City Hall, 200 N Spring Street, or the City's websites at:

http://www.lacity.org; and City Planning and Zoning Information Mapping Automated System (ZIMAS) at http://www.cityplanning.lacity.org/.

Engineering/Infrastructure/Topographic Maps/Parcel Information is available at:

http://boemaps.eng.ci.la.ca.us/index0.1htm or City's main website under the heading "Navigate LA."

This Mitigated Negative Declaration is available on-line at planning.lacity.org under "Environmental Review" and then "Negative Declaration Public Notices."

PLANNER NAME:	TITLE:	TELEPHONE NO:	DATE:
Cally Hardy	Planning Assistant	213-978-1643	November 16, 2017

IV. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study/Mitigated Negative Declaration (IS/ND) contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist. The thresholds of significance are based on Appendix G of the State CEQA Guidelines.

IMPACT ANALYSIS

1. AESTHETICS

Under Public Resources Code Section 21099, enacted by Senate Bill (SB) 743, a development project's aesthetic (exclusive of aesthetic impacts to cultural resources) impacts are not considered significant impacts on the environment if:

- The project is a residential, mixed-use residential, or an employment center project, and
- The project is located on an infill site within a Transit Priority Area (TPA); a TPA is an area within ½ mile of a major transit stop.

All PSH projects are required to be developed within High Quality Transit Areas (HQTAs) that encompass slightly larger area than TPAs. (An HQTA is an area within one-half mile of (1) a fixed guideway transit stop, or (2) bus transit corridors where buses pick up passengers every 15 minutes or less during peak commute hours.)

SB 743 applies to individual development projects. It is unclear if SB 743 applies to ordinances such as the PSH Ordinance or just development projects. This initial study considers aesthetic impacts from the PSH Ordinance. However, for informational purposes, it is noted that most PSH projects developed under the PSH Ordinance and/or the cumulative previously approved gap-funding projects would be expected to meet SB 743 criteria if individually evaluated.

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact.

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, examples in the City of Los Angeles, include views of the Pacific Ocean, Santa Monica

Mountains, Hollywood Hills, Simi Valley Hills, and San Gabriel Mountains from public parks and along city roadways.

The PSH Ordinance could result in the construction of 200 new PSH units annually over a ten-year period within the City of Los Angeles. The construction of these units would occur on both vacant and utilized lots within HQTAs. Construction vehicles and ground disturbance associated with the Proposed Ordinance would be visible from the surrounding properties and streets. However, these views would be temporary and typical of urbanized areas undergoing redevelopment. Due to the developed nature of these areas, public views of scenic vistas are intermittent and would continue to be so even after adoption of the Proposed Ordinance.

Individual Qualified PSH Projects would be integrated with other developments in already-urbanized areas. Views of and to the potential PSH sites would be limited to the immediate area and the density of existing development and landscaping in the vicinity. The availability of broad views to scenic resources (i.e. the Santa Monica Mountains and the Pacific Ocean) is frequently limited and frequently restricted. Development under the PSH Ordinance is required to be located in HQTAs. These transit area are generally in the densest parts of the City with the tallest structures. In these areas, scenic vistas are not readily available.

Implementation of the PSH Ordinance project would streamline processes for new and remodeled residential structures within the City of Los Angeles in areas of the City designed to accommodate the highest densities. Some impingement of views of scenic resources could occur, but overall impacts are anticipated to be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact.

Currently, the only portion of a scenic highway officially designated by the California Department of Transportation (Caltrans) in Los Angeles County is the 2 Freeway near La Canada-Flintridge.

Within the City of Los Angeles, a six-mile portion of the Pasadena Freeway (also known as the Arroyo Seco Historic Parkway) from milepost 25.7 to 31.9 is designated as a Historic Parkway and other portions of freeways are considered eligible but not officially designated including 2.5 miles of Topanga Canyon State Scenic Highway (State Route 27).[16] While development of PSH units may occur adjacent to an existing scenic highway (i.e., Arroyo Seco Historic Parkway) such development would not be out of

16 California Scenic Highway Mapping System http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/

scale or character with the surrounding area to damage scenic resources. Views of the eligible portion of the Pacific Coast Highway (Highway 1 or SR 1) are generally blocked by terrain and developments, and are generally not available. As such, the Proposed Ordinance would not damage a scenic resource in a state scenic highway and there would be no impacts.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact.

The PSH Ordinance would allow for projects to select up to four concessions with respect to the Zoning Code, including up to 20 percent decrease in required setbacks, up to 20 percent reduction in required open space, up to 20 percent increase in lot coverage limits, up to 35 percent increase in FAR and depending on the height district up to a 35 percent increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. This would allow for gradual transitions to an R2 or more restrictive zone. Although PSH projects would receive some concessions on typical design requirements (i.e., setbacks and open space) in large part, they would remain consistent with the zoning of the site. Further, with the additional consideration for R2 and more restrictive zones, projects, which are anticipated to have an average size of 75 units, would be located in the most dense parts of the City where structures are the tallest, and therefore would not be out of character with the surrounding urban development. Impacts would be less than significant, and no mitigation would be required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact.

Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The Proposed Ordinance would not directly introduce new sources of glare as building materials would be non-reflective materials such as wood, brick, and similar materials. Therefore glare impacts would be less than significant.

Individual PSH 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 PSH Ordinance are anticipated to occur where development already occurs and where existing lighting is typical of urban uses similar to, or greater than, lighting levels associated with PSH projects. Development of individual projects would be subject to City requirements that regulate spillover lighting including LAMC Chapter 9, Article 3, Section 93.0117. Impacts would be less than significant, and no mitigation would be required.

2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and Assessment Project and Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

b) **Conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

d) **Result in the loss of forest land or conversion of forest land to non-forest use?**

e) **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?**

No Impact.

PSH development is anticipated to occur in urban areas in proximity to transit. Because development in accordance with the PSH Ordinance is required to be located in HQTAs, implementation of the PSH Ordinance would not convert farmland to non-agricultural use, affect an agricultural preserve eligible for enrollment under a Williamson Act contract, or impact forest land or timber land. The PSH Ordinance would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. Therefore the PSH Ordinance would have no impact related to agricultural and forestry resources as there are no such resources present in areas where development is anticipated to occur (HQTAs). No impact would occur, and no mitigation would be required.

3. AIR QUALITY

It should be noted that each individual PSH development project would in all likelihood fall below the City's air-quality-related screening criteria for projects eligible for a Categorical Exemption (80 units and less than 20,000 cubic yards of soil export) and therefore would not foreseeably result in significant adverse impact on air quality. The City's air quality screening criteria for preparation of Categorical Exemptions is based on numerous models of various projects; significant air emissions have not been identified for projects of this size (80 units) and less. As discussed above, based on historical PSH projects, PSH development of more than 75 units is unlikely. Projects with more than 120 units (200 units in Greater Downtown) are subject to site plan review and additional environmental review. While the PSH Ordinance would allow for individual projects of up to 120 units, because excavation is anticipated to be minor (since PSH projects have low parking requirements) and because model runs for typical (not PSH) residential projects with up to 200 units and moderate (less than 20,000 cubic yards of soil export) have not shown significant air quality impacts, impacts adjacent to all PSH Projects are anticipated to be less than significant.

Where available and applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact.

The City of Los Angeles is entirely within the South Coast Air Basin (SCAB) and is subject to the Air Quality Management Plan (AQMP) prepared by the SCAQMD. The SCAQMD has adopted a 2016 AQMP that focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles.[17] The 2016 RTP/SCS anticipates up to 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs in the City of Los Angeles by 2040.

The 2016 AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formation of the AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of

17 SCAG adopted the 2016 RTP/SCS on April 7, 2016. The 2016 AQMP was adopted March 3, 2017 by the AQMD.

the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

Consistency with the assumptions in the AQMP is established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast. The 2016 AQMP based its assumptions on growth forecasts contained in the SCAG's 2016 RTP/SCS.[18] The 2016 RTP/SCS is based on growth assumptions through 2035 developed by each of the cities and counties in the SCAG region.

The Proposed Ordinance would establish permanent supportive housing to homeless persons already residing within the region. The Proposed Ordinance would not add any new population to the region. For the 2,000 units anticipated to occur over 10 years, approximately 3,664 daily trips would be expected to occur.[19] These trips are within the assumptions for development assumed to be located within the City of Los Angeles as part of the 2016 RTP/SCS. Thus, the PSH Ordinance would be considered consistent with the air quality-related regional plans, and would not jeopardize attainment of state and federal ambient air quality standards. The PSH Ordinance would have a less than significant impact. No further analysis is required.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact.

Pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. Air pollutants are categorized as primary or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO) volatile organic compounds (VOC), nitrogen dioxide (NO2), sulfur dioxide (SO2), coarse inhalable particulate matter (PM10), fine inhalable particulate matter (PM2.5), and lead (Pb) are primary air pollutants. Of these, CO, SO2, NO2, PM10, and PM2.5 are considered "criteria air pollutants," which means that ambient air quality standards have been established for them at the federal (National Ambient Air Quality Standards (NAAQS)) and state level (California Ambient Air Quality Standards (CAAQS)). The SCAB is currently in nonattainment for the one-hour and eight-hour ozone (O_3), PM10, PM2.5, and Pb.[20]

---

18 South Coast Air Quality Management District, 2017, 2016 Air Quality Management Plan.

19 Trip generation rates from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016. Peak hour trip generation would be 0.12 trips per unit for PSH units and 0.5 trips per unit for family units; daily trip generation would be 1.27 trips per day PSH and 4.08 trips per day per family unit. For a total of 2,000 units: daily trips: 1,600 single units = 2032 trips daily trips; 400 family units = 1,632 trips daily trips, = 3664 total daily trips.

20 2016 NAAQS and CAAQS Attainment Status for SCAB, http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2, accessed November 7, 2016.

Construction

Construction phase modeling assumptions for each PSH Project would be approximately as shown in **Table 5, Modeled Construction Schedule** below.

Table 5
Modeled Annual Construction Schedule – 200 PSH Units

Phase	Approximate Duration
Demolition	2 weeks
Site Preparation	2 weeks
Grading	2 weeks
Building Construction	9.5 months
Paving	1 week
Architectural Coating	2 weeks

Source: Impact Sciences, 2017

Table 6, Estimated Daily Construction Emissions, shows the emissions associated with construction of 200 units each year. As shown in Table 5, construction of 200 units would not exceed the SCAQMD's regional thresholds. As shown in **Table 5**, even if all 200 units were constructed on one site, localized emissions of NOx, CO, PM10 and PM2.5 would not exceed the SCAQMD's localized significance thresholds. As a result, this impact is considered less than significant with mitigation incorporated.

Table 6
Estimated Daily Construction Emissions – 200 PSH Units

	Pounds Per Day					
Construction Phase	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Maximum Regional Total (2018)	28	20	23	<1	5	1
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***
Maximum Localized Total	28	4	15	<1	4	1
Localized Construction Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	***N/A***	***No***	***No***	***N/A***	***No***	***No***

Source: Impact Sciences, 2017 based on CalEEMod 2016.3.1 model runs, included as Appendix A.
LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.

Operation

Long-term air quality impacts to the region can occur from projects like PSH development primarily from operation of motor vehicles that access PSH project sites

and landscaping operations. In order to evaluate the impact of the PSH Ordinance, operation of 2,000 PSH units was modeled. As stated previously, operation of 2,000 PSH units is estimated to result in 3,664 daily trips.[21] In addition, each of the units would generate air quality emissions associated with general use (water, cooking, heating and cooling operations). Landscaping of common grounds would also result in area source and energy emissions. Combined operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NOX, CO, PM10 and PM2.5 emissions (**Table 6, Estimated Daily Operations Emissions**). As a result, the Project's operational impacts on regional air quality are considered less than significant.

With regard to localized air quality impacts, assuming 2,000 PSH units were constructed, the PSH Ordinance would result in minimal emissions of NO2, CO, PM10, and PM2.5 from area and energy sources. As shown in **Table 7**, these emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The Project's operational impacts on localized air quality would be less than significant.

Table 7
Estimated Daily Operations Emissions

	Pounds per Day					
Emission Source	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
Area Sources	17	2	125	<1	1	1
Energy Sources	1	7	3	<1	1	1
Mobile Sources	7	34	71	<1	15	4
Total Regional Total	25	42	200	<1	17	6
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	*No*	*No*	*No*	*No*	*No*	*No*
Localized Total	17	2	125	<1	1	1
Localized Operational Significance Threshold	--	74	680	--	2	1
Exceed Threshold?	*N/A*	*No*	*No*	*N/A*	*No*	*No*

Source: Impact Sciences, 2017 based on CalEEMod 2016.3.1 model runs, included as Appendix A.
LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.
Totals may not reflect the addition of each individual source due to rounding within the table.

21 Trip generation rates from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016. Peak hour trip generation would be 0.12 trips per unit for PSH units and 0.5 trips per unit for family units; daily trip generation would be 1.27 trips per day PSH and 4.08 trips per day per family unit. For a total of 2,000 units total daily trips: 1,600 single units x 1.27 = 2,032 trips daily trips; 400 family units x 4.08 = 1,632 trips daily trips = 3664 total daily trips.

The long-term operation of the PSH Ordinance would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality. Project impacts would be less than significant and no further analysis is required.

Construction of PSH projects would occur throughout the year (a little less than one per month), and would not occur simultaneously. PSH projects would have to comply with the following regulatory requirements:

Regulatory Compliance Measures

RCM AIR-1: Demolition, grading and construction activities must comply with provisions of the SCAQMD District Rule 403, including the following:

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.

RCM AIR-2: PSH projects are required to comply with South Coast Air Quality Management District Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos- containing materials (ACM).

RCM AIR-3: PSH projects are required to comply with Sections 2485 in Title 13 of the California Code of Regulations, which requires that idling of all diesel fueled

commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

RCM AIR-4: PSH projects are required to comply with Section 93115 in Title 17 of the California Code of Regulations, that requires operation of any stationary, diesel-fueled, compression-ignition engines meet specified fuel and fuel additive requirements and emission standards.

RCM AIR-5: PSH projects are required to comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

RCM AIR-6: PSH projects are required, as may be needed, to install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Less Than Significant Impact.

A significant impact would occur if implementation of the Proposed Ordinance could result in a cumulative net increase in any criteria pollutant above the SCAQMD significance threshold.

As shown in **Table 5** and **Table 6,** the Proposed Ordinance would not generate significant criteria pollutant emissions during construction or operation. Other related projects in the area would be required to comply with local and regional air quality emission regulations. Because individual projects constructed in accordance with the Proposed Ordinance would not emit significant quantities of air pollutants, it is not anticipated that Qualified PSH Projects resulting from the Proposed Ordinance would contribute significantly to cumulative air emissions.

Therefore, the Proposed Ordinance would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality. Impacts would be less than significant and no further analysis is required.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

An impact is significant if sensitive receptors (such as children and the elderly) are exposed to substantial pollutant concentrations such as toxic air contaminants (TACs) and CO concentrations. Sensitive receptors include residences, schools, playgrounds,

childcare centers, athletic facilities, churches, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Land that are sensitive to air pollution could include residential uses, schools, churches, and parks.

During construction, sensitive receptors could be exposed to a variety of airborne emissions including those from construction equipment. As shown in **Table 5**, emissions would not exceed the SCAQMD's significance thresholds. Due to the limited scale, the short duration, of construction activities, as well as the distribution of units constructed in accordance with the PSH Ordinance across multiple sites across the City, the PSH Ordinance would not result in the exposure of sensitive receptors to substantial pollutant concentrations during construction. As shown in **Table 6**, development in accordance with the Proposed Ordinance (2,000 units after ten years) would not result in substantial emissions that could impact sensitive receptors.

As a result, project-related impacts to sensitive receptors would be less than significant.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact.

Construction activities that occur pursuant to the Proposed Ordinance would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, the odors would be temporary, and construction activity would be required to comply with SCAQMD Rule 402.[22] A less than significant impact relative to an odor nuisance would occur during construction activities associated with development of Proposed Ordinance sites.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[23] The PSH Ordinance would not authorize or propose any development of these types of odor producing facilities. Therefore, the development of the PSH Ordinance would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant, and no further analysis is required.

---

22 SCAQMD Rule 402 states the following, "[a] person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

23 South Coast Air Quality Management District, CEQA Air Quality Handbook; http://www.aqmd.gov/ceqa/hdbk.html, December 11, 2015.

4. BIOLOGICAL RESOURCES

Would the project:

a) Have 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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less than Significant Impact.

Potential PSH projects are expected to occur on vacant/underutilized infill parcels in existing multi-family residential zones in an urbanized context (located in HQTAs). 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. The potential presence of native trees would be addressed by Los Angeles Municipal Code Ordinance No. 177,404, which requires protection and replacement of protected trees.

Mature trees may be located on project sites as well as in parkways and other public right-of-ways which may abut potential PSH development sites. Although the trees are mainly ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. Construction activities that occur pursuant to the Proposed Ordinance would be required to comply with the provisions of the MBTA as detailed in the Regulatory Compliance Measure RCM BIO-1. Adherence to RCM BIO-1 would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds if present. Thus impacts would be less than significant, and no mitigation is required.

Regulatory Compliance Measure

RCM BIO-1: The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact.

PSH Projects are expected to occur on existing vacant/underutilized infill parcels in existing residential zones within HQTAs. Given the location of potential PSH Sites within urban areas in proximity to transit, no significant riparian habitat or other sensitive natural communities occurs in such urban areas. Therefore, the Proposed Ordinance would have no impacts on these resources.

c) Have 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?

No Impact.

See response to **Section 4(b)**, above.

d) Interfere 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?

Less Than Significant Impact.

Given the location of the project sites within HQTAs within the City of Los Angeles and the absence of habitat in such urban areas, no significant wildlife movement occurs through potential PSH sites. See also discussion of MBTA in response to a) above.

With adherence to RCM BIO-1, less than significant impacts would occur and no mitigation is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact.

Numerous trees are located along roadways that could abut PSH sites and on private property. Construction activities that occur pursuant to the Proposed Ordinance would be required to comply with the City's Protected Tree Ordinance,, BIO-2.

Compliance with the City's Protected Tree Ordinance as detailed in RCM BIO-2 would ensure that impacts to protected trees would be less than significant and no mitigation is required.

Regulatory Compliance Measure

RCM BIO-2: Los Angeles Municipal Code (LAMC) Sec. 46 Tree Preservation Ordinance (Ordinance No. 177,404) applies to protected trees (4 inches and greater in diameter) that are located on public and private properties. Protected tree removal requires a removal permit by the City of Los Angeles Department of Public Works (LADPW). Any act that may cause the failure or death of a protected tree requires inspection by the LADPW's Urban Forestry Division. The following tree species are protected: all native Oak tree species (Quercus spp), Western or California Sycamore (Platanus racemosa), California Bay (Umbellularia californica), Southern California Black Walnut (Juglans californica).

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact.

See response to **Section 4(b)**, above.

There are no Habitat Conservation Plans, or Natural Community Conservation Plans, or other approved habitat conservation plans that could be affected by PSH development in the City of Los Angeles. No impacts would occur and no mitigation is required.

5. CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less Than Significant Impact with Mitigation Incorporated.

The PSH Ordinance would streamline a process for development of PSH units throughout the City. Redevelopment could include sites that contain historical resources. Impacts could potentially occur if the PSH Ordinance had the potential to result in a substantial adverse change in the significance of a historical resource.

Use of sites with historical resources seems unlikely for PSH projects. As discussed above, construction of PSH developments requires meeting tight budgets. Construction that would significantly impact a historical resource includes the additional hurdles and requirements, including the time and cost to prepare an EIR.

Impacts to designated resources are unlikely because demolition of such resources requires regulatory review before a building permit can be pulled. However, buildings identified in Survey LA (or similar surveys that meets the requirements of PRC 5024.1(g)) do not always require regulatory review prior to demolition.

Based on the above, it is speculative at this time to identify the loss of any particular resource and it is not foreseeable that an impact could occur to either designated resources in HPOZs or a designated Cultural Heritage Monument. Although unlikely there may be a potential for impacts to resources identified in Survey LA but not designated.

Mitigation Measure MM-CUL-1 below includes requirements for avoiding impacts to undesignated historical resources identified in qualified surveys (MM-CUL-1 below). In particular, any project that includes an historical resource, as defined by PRC Section 21084.1, including those in SurveyLA 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.

With imposition of the following Mitigation Measure (MM-CUL-1), impacts to historical resources are expected to be less than significant. This Mitigation measure is incorporated in to the PSH Ordinance as a requirement (Construction Standard).

Mitigation Measure

MM-CUL-1: Identify the potential for an historical resource (as defined by Public Resources Code Section 21084.1 as determined by the Director, in consultation with the

Office of Historic Resources) to be present on the site. Any project that may impact an historical resource identified in a Survey meeting the requirements of Public Resources Code section 5024.1(g), including Survey LA, unless determined by the Director of City Planning, in consultation with OHR, to not be a historical resource, shall comply with the Secretary of the Interior Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995).

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact With Mitigation Incorporated.

Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which constitute unique archaeological resources.

Development in the City would continue to be subject to the numerous laws and regulations that require state and local agencies to consider the effects of a Proposed Ordinance on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies.

In general, it is expected that most sites that would be developed with individual PSH projects have been previously disturbed. Further, individual PSH projects are not expected to include substantial parking that would necessitate the construction of underground parking (due to the low auto use rates of the PSH population and reduced parking requirements). Therefore, the potential for uncovering previously unidentified archeological resources is low. However an impact could occur in previously undisturbed areas where resources are present if construction extended below these levels.

In accordance with Mitigation Measure MM-CUL-2 (included in the PSH Ordinance as a requirement – Construction Standard), if archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts would be less than significant with mitigation incorporated, and no further analysis is necessary.

Mitigation Measure

MM-CUL-2: Conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether archaeological resources are potentially present. If the potential for archeological

resources exists, excavation in previously undisturbed soils shall be monitored by a qualified archeologist. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction personnel shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Significant archaeological resources affected by a project shall be protected and preserved.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated.

Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations.

In general, it is expected that most sites that would be developed with individual PSH projects have been previously disturbed. Further, individual PSH projects are not expected to include substantial parking that would necessitate the construction of underground parking (due to the low auto use rates of the PSH population and reduced parking requirements). Therefore, the potential for uncovering previously unidentified paleontological resources is low. However an impact could occur in previously undisturbed areas where resources are present if construction extended below these levels.

In accordance with Mitigation Measure MM-CUL-3 (included in the PSH Ordinance as a requirement – Construction Standard), if paleontological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified paleontologist has evaluated the find in accordance with federal, State, and local guidelines. Therefore, impacts would be less than significant with mitigation incorporated, and no further analysis is necessary.

Mitigation Measure

MM-CUL-3: Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to impact parent material with a moderate to high potential to contain unique paleontological resources, or to require the substantial alteration of a unique geologic feature. If the potential for paleontological resources exists, excavation in previously undisturbed soils shall be monitored by a qualified paleontologist. If potential paleontological resources

are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact.

In the event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e).

In general, it is expected that most sites that would be developed with individual PSH projects have been previously disturbed. Further, individual PSH projects are not expected to include substantial parking that would necessitate the construction of underground parking (due to the low auto use rates of the PSH population and reduced parking requirements). Therefore, the potential for uncovering previously unidentified human remains is low. The PSH Ordinance includes Construction Standards related to the accidental discovery of human remains. Regulatory Compliance Measure RCM-CUL-1 also ensures against impacts to human remains.

Regulatory Compliance Measure

RCM CUL-1: If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

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 future residents and users of a project, as well as other impacted individuals.

Would the project:

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.

No impact.

Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults. These zones, which extend from 200 to 500 feet on each side of known active faults, identify areas where potential surface ruptures along active faults could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. There are several Alquist-Priolo Fault Zones located in the City.[24]

Development in accordance with the PSH Ordinance would not exacerbate existing geologic conditions. While PSH development would be subject to ground shaking during future seismic events, (as most structures within Southern California are) through the incorporation of proper engineering measures in accordance with existing regulations (see RCM's listed below), and building codes, risks to life and property would be minimized; PSH Projects would not exacerbate existing hazards. Therefore, the PSH Ordinance would have no impact related to seismic hazards. No mitigation measures are required.

---

24 City of Los Angeles General Plan, Safety Element, Exhibit A Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed June 10, 2017.

Regulatory Compliance Measures

RCM GEO-1: The design and construction of a project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

RCM GEO-2: Projects shall comply with the conditions contained within any Department of Building and Safety Geology and Soils Report Approval Letter.

RCM GEO-3: Applicants to provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

RCM GEO-4: Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Applicants are required to implement Best Management Practices (BMPs) during grading and excavation to reduce erosion, including, but not limited to the following:

Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April I), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio- degradable soil stabilizer.

RCM GEO-5/HYD-1: National Pollutant Discharge Elimination System General Permit. Prior to issuance of a grading permit, Applicants shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002, Construction General Permit). Applicants shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. Storm Water Pollution Prevention Plans shall be prepared and implemented in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

ii) Strong seismic ground shaking?

No Impact.

The City of Los Angeles is located within seismically active Southern California and therefore could be subject to moderate and possibly strong ground motion due to earthquakes from one of the several faults that traverses the Project Area.

All development in the Project Area would be required to comply with regulatory requirements above. Compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would ensure no impacts; PSH Projects would not exacerbate existing hazards. No mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

No Impact.

Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

Portions of the City of Los Angeles are susceptible to liquefaction,[25] and thus may be susceptible to seismic-related ground failure such as lateral spreading, subsidence, or settlement. However, development in accordance with the PSH Ordinance would not exacerbate existing geologic conditions. Construction activities that occur pursuant to the Proposed Ordinance would be required to comply with current seismic design provision of the CBC and City's Building Code, which incorporates relevant provisions related to protection against liquefaction. Compliance with regulatory measures would ensure no impacts. No further analysis is required.

---

25 City of Los Angeles General Plan, Safety Element, Exhibit B Areas Susceptible to Liquefaction in the City of Los Angeles, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed June 10, 2017.

iv) Landslides?

No Impact.

Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure.

A number of neighborhoods in the City are susceptible to bedrock landslides and small shallow surface landslides.[26] In general, development in the City is required to comply with all applicable regulations and design standards of the LAMC and the City's "Hillside" Development regulations, which sets specific building requirements beyond the CBC that relate directly to development of lots in designated "Hillside Areas." Development in accordance with the PSH Ordinance would not exacerbate existing geologic conditions. No impact would occur and no further analysis is required.

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

Less Than Significant Impact.

Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

Construction activities pursuant to the Proposed Ordinance would be subject to all applicable RCMs, including Best Management Practices (BMPs) relating to erosion and stormwater runoff included in the City's Low Impact Development (LID) Ordinance (LAMC Ordinance No. 181,899).[27] LID is a stormwater management strategy that seeks to mitigate the impacts of runoff and stormwater pollution as close to its source as possible. LID comprises a set of site design approaches and BMPs that are designed to address runoff and pollution at the source. Thus, implementation of the Proposed Ordinance would not result in substantial erosion or loss of topsoil. Impacts would be less than significant and no mitigation would be required.

---

26 City of Los Angeles General Plan, Safety Element, Exhibit C Landslide Inventory & Hillside Areas in the City of Los Angeles, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed June 10, 2017.

27 The City's LID Ordinance became effective in May 2012. The main purpose of this ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater at its source, while utilizing natural resources.

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?

No Impact.

Refer to **Section 6 a (iii)** and **(iv)**.

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.

Development in accordance with the PSH Ordinance would be required to comply Building Code regulations that ensure buildings' safety and that appropriate engineering solutions address site conditions. Compliance with existing code would ensure structures constructed on suitable soils and that appropriate engineering practices are adhered to. The PSH Ordinance would not result in exacerbation of any site conditions related to unstable geologic units. Therefore, the PSH Ordinance would result in no impact related to unstable geologic units. No mitigation measures are required.

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

No Impact.

Development in accordance with the PSH Ordinance would be required to comply Building Code regulations that ensure buildings' safety and that appropriate engineering solutions address site conditions. Compliance with existing code would ensure structures constructed on suitable soils and that appropriate engineering practices are adhered to. The PSH Ordinance would not result in exacerbation of any site conditions related to expansive soils. Therefore, the PSH Ordinance would result in no impact related to expansive soils. No mitigation measures are required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact.

All development pursuant to the Proposed Ordinance would connect to existing City's sewers mainlines and service lines, and therefore, would not require the use of septic systems. Therefore, no impact would occur and no further analysis is required.

7. GREENHOUSE GAS EMISSIONS

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

Construction and operation (i.e., use of the new building by occupants and mobile emissions associated with such use) of the Proposed Ordinance would generate greenhouse gas emissions.

GHGs trap heat in the earth's atmosphere. GHGs include carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). The international scientific communities have recognized that GHGs are contributing to global climate change. Predicted effects of global climate change include sea level rise, water supply changes; changes to ecosystems and habitat; and human health effects. Carbon dioxide is the primary contributor to global climate change. As a result, GHG contributions are commonly quantified in the equivalent mass of CO_2, denoted as CO_2e.

Executive Orders S-3-05 establishes the following greenhouse gas reduction goals: 1) by 2010, reduce GHG emissions to 2000 levels; 2) by 2020, reduce GHG emissions to 1990 levels; 3) by 2050, reduce GHG emissions to 80 percent below 1990 levels

The first and second goals were passed in to law by AB 32, the Global Warming Solutions Act of 2006 that gave the California Air Resources Board (CARB) broad authority to implement a market-based system (also known as cap-and-trade) to achieve these goals. California Executive Order B-30-15 added the intermediate target of, by 2030, reducing GHG emissions to 40 percent below 1990 levels. This intermediate target was passed into law by SB 32. SB 350 requires that electricity sold to retail customers include 50% renewable resources by the end of 2030.

Until the passage of AB 32, CEQA documents generally did not evaluate GHG emissions or impacts on global climate change. Rather, the primary focus of air pollutant analysis in CEQA documents was the emission of criteria pollutants, or those identified in the California and federal Clean Air Acts as being of most concern to the public and government agencies (e.g., toxic air contaminants). With the passage of AB 32 and SB 97, CEQA documents now contain a more detailed analysis of GHG emissions. However, the analysis of GHGs is different from the analysis of criteria pollutants. Since the half-life of CO_2 is approximately 100 years, GHGs affect the global

climate over a relatively long timeframe. Conversely, for criteria pollutants, significance thresholds/impacts are based on daily emissions; and the determination of attainment or non-attainment are based on the daily exceedance of applicable ambient air quality standards (e.g., 1-hour and 8-hour exposures). Also, the scope of criteria pollutant impacts is local and regional, while the scope of GHG impacts is global.

Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance." Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact. The following two questions relating to the effects of GHGs were added to the CEQA Guidelines, Appendix G.

- Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice, this section urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. In addition to quantification, this section recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments do not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis.[28]

---

28 See generally Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources (April 13, 2009).

As indicated above, the CEQA Guidelines were amended in response to Senate Bill 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[29] To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[30] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[31] CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[32]

Greenhouse gas emissions are addressed at the federal, state, and local level through a number of plans, policies, and regulations.

At the federal level, in 2007, the US Supreme Court ruled in *Massachusetts v. Environmental Protection Agency* (127 S. Ct. 1436) that greenhouses gases are pollutants

---

29 14 CCR § 15064(h)(3).

30 14 CCR § 15064(h)(3).

31 14 CCR § 15064(h)(3).

32 See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA..." Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO2e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2).

under the federal Clean Air Act, and therefore, the US Environmental Protection Agency has the responsibility to regulate greenhouse gases.

In response to concern regarding GHGs and global climate change, the state passed Assembly Bill 32 (AB 32) also known as the California Global Warming Solutions Act of 2006. AB 32 (Health and Safety Code Section 38500 et. seq) mandated a reduction in the state's GHG levels. AB 32 is the basis for reduction of GHG emissions in California. Local agencies such as the SCAQMD base their planning and regulations on the requirements included in AB 32, which include a reduction of GHG emissions to 1990 rates by 2020 (15 percent below business as usual).

Senate Bill 375 (SB 375) passed by the State of California in 2009, requires metropolitan regions to adopt transportation plans and sustainable communities strategy that reduce vehicle miles travelled. In accordance with SB 375, SCAG prepared and adopted the 2016 RTP/SCS with the primary goal of enhancing sustainability by increasing mobility through various public transit options, increasing the number and variety of housing options to meet the demands of the growing population, creating more compact communities while decreasing urban sprawl, and ensuring people are able to live closer to work, school, and recreation uses. Additionally, the 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS. Development that occurs pursuant to the Proposed Ordinance would be consistent with the following land use policies included in the 2016 RTP/SCS:[33]

- Develop "Complete Communities"
- Continue to protect stable, existing single-family areas
- Incorporate local input and feedback on future growth

Pursuant to the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), the City adopted a Climate Action Plan (CAP) in 2007 with the goal of reducing the City's GHG emissions to 35 percent below the 1990 levels by the year 2030. The CAP details steps for City departments and agencies to reduce GHG emissions and create a more sustainable environment.[34] The Proposed Ordinance would not prohibit the implementation of City policies and objectives included in the City's CAP.

As of January 3, 2014, the City of Los Angeles implemented Ordinance No. 182,849 as the most recent update to the Los Angeles Green Building Code. The Los Angeles Green Building Code is based on the 2013 California Green Building Standards Code and commonly known as *CAL*Green that was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to

---

33 SCAG 2016 RTP/SCS, p. 75.

34 City of Los Angeles 2007 Climate Action Plan, http://environmentla.org/pdf/greenla_cap_2007.pdf, accessed May 4, 2016.

reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the Los Angeles Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)
- Alterations with building valuations over $200,000 (residential and non-residential)

Specific measures to be incorporated into future development to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;
- Enhanced refrigerant management;
- Use of energy efficient lighting;
- Use of Energy Star appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15 percent of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping; and
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems.

- Provision of electric vehicle charging stations in the parking structure; 5% of total spaces will be designated for low emitting, fuel efficient and carpool/van pool vehicles.

Executive Orders S-3-05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance all apply to PSH development and are all intended to reduce GHG emissions to meet the statewide targets set forth in AB 32. Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions: Executive Orders S-3-05 and B-30-15; Senate Bill (SB 375); SCAG's Sustainable Communities Strategy; and the City of Los Angeles Green Building Ordinance.

Regulatory Compliance Measures

RCM GHG-1: Title 24 2016 standards and include ENERGY STAR appliances. An approximate 16% reduction in energy demand and associated GHG emissions is attributable to compliance with Title 24 standards and the installation of Energy Star appliances.

RCM GHG-2: Construction waste is required to be reduced by at least 50 percent. AB 939 requires diversion of 50 percent of solid waste to landfills through source reduction, recycling, and composting. The California Solid Waste Reuse and Recycling Access Act of 1991 requires adequate storage areas for collection and storage of recyclable waste materials.

RCM GHG-3: The LA Green Building Code, requires a schedule of plumbing fixtures and fixture fittings that reduce potable water use within development by at least 20 percent. Irrigation design and controllers are required that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. An approximate 16% reduction in water demand and associated GHG emissions is attributable to compliance with this measure.

RCM GHG-4: PSH projects would use energy from the Los Angeles Department of Water and Power (LADWP), which is required to diversify its portfolio of energy sources to increase the use of renewable energy.

RCM GHG-5: In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), projects are required to comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.

In addition, based on requirements associated with tax credit funding, it is anticipated that PSH projects would meet or exceed Title 24 and the Los Angeles Green Building Code requirements.

The Proposed Ordinance could result in construction of 200 PSH units each year for 10 years. During construction activities, future development would directly contribute to climate change through its contribution of the GHGs from the exhaust of construction equipment and construction workers' vehicles. Based on the analysis below, these contributions are less than significant.

The Proposed Ordinance could result in the addition of operational sources of GHG emissions from vehicles, as well as water, energy, waste, and area sources associated with daily use of the units. This includes energy production for electricity usage (e.g., residential lighting, appliances, etc.), emissions from landscaping equipment, residential water usage (faucets, sprinklers, etc.), and waste disposal. Based on the analysis below, operational contributions to GHG are less than significant.

Construction emissions were estimated using CalEEMod according to the same methodology as described above in **Section 3, Air Quality.** The SCAQMD recommends that construction GHG emissions be amortized over a 30-year project lifetime and are shown in **Table 8, Estimated Construction CO2e Greenhouse Gas Emissions**. **Table 9, Estimated Operational Greenhouse Gas Emissions,** shows a summary of total estimated GHG emissions from operation of the Proposed Ordinance at buildout of all 2,000 units.

Table 8
Estimated Construction CO2e Greenhouse Gas Emissions (Metric Tons per Year)

Scenario and Source	Annual Emissions
Construction Emissions	17

Annual construction emissions of 511 tons amortized over 30-year period.
Source: Impact Sciences, 2017.

Table 9
Estimated Annual Operational CO_2e Greenhouse Gas Emissions (Metric Tons per Year)

Scenario and Source	2028 Project Emissions
Area Sources	24
Energy Sources	5,943
Mobile Sources	4,784
Waste Sources	462
Water Sources	1,261
Total Emissions	12,474

Source: Impact Sciences, 2017.

Development that occurs pursuant to the Proposed Ordinance would be subject to the measures included in the Los Angeles Green Building Code. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that development that occurs pursuant to the Proposed Ordinance's GHG emissions would cause a measurable increase in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, current energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. Consistency with GHG reduction strategies is an important priority, and reasonable reduction efforts should be taken. As shown in **Table 10, Consistency with Applicable Greenhouse Gas Reduction Strategies,** the Proposed Ordinance would be consistent with GHG reduction measures from other applicable plans.

Table 10
Consistency with Applicable Greenhouse Gas Reduction Strategies

Source	Category/Description	Consistency Analysis
AB 1493 (Pavley Regulations)	Reduces GHG emissions in new passenger vehicles from 2012 through 2016. Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020	**Consistent.** The Proposed Ordinance would not conflict with implementation of the vehicle emissions standards.
Executive Order S-3-05	Establishes GHG emission reduction targets: By 2010 reduce GHG emissions to 2000 levels By 2020 reduce GHG emissions to 1990 levels By 2050 reduce GHG emissions to 80 percent below 1990 levels	**Consistent.** The Proposed Ordinance would not prohibit the state from reaching these targets.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	**Consistent.** The Proposed Ordinance would not conflict with implementation of the emissions standards for power plants.
SB 375	Supports the state's climate actions goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under SB375 the California Air Resources Board set regional targets for GHG emissions reductions from passenger vehicle use.	**Consistent.** The Proposed Ordinance would not conflict with the implementation of passenger vehicle emission reduction measures.
Executive Order B-30-15	Establishes a state GHG reduction target of 40 percent below 1990 levels by 2030.	**Consistent.** The Proposed Ordinance would not prohibit the state from reaching the 2030 GHG reduction target.
SB 350	Establishes California's 2030 greenhouse gas reduction target of 40 percent below 1990 levels and increases California's renewable electricity procurement goals from 33 percent by 2020 to 50 percent by 2030.	**Consistent.** The Proposed Ordinance would not prohibit the state from reaching the 2030 GHG reduction target.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	**Consistent.** The Proposed Ordinance would not conflict with implementation of the transportation fuel standards.

Source	Category/Description	Consistency Analysis
California Green Building Code Standards Code Requirements	All bathroom exhaust fans to be ENERGY STAR compliant.	**Consistent.** The Proposed Ordinance would comply with the Title 24 Building Standards Code as required by the City's Green Building Code (Ordinance No. 181,480).
	Parking spaces to be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces to be designated for such vehicles.	**Consistent.** The Proposed Ordinance would comply with the Los Angeles Green Building Code (LAGBC) implementation of designated parking spaces for carpool or alternative fuel vehicles.
	Long-term and short-term bike parking to be provided for up to five percent of vehicle trips.	**Consistent.** The Proposed Ordinance would comply with the LAGBC implementation of designated bicycle parking.
	Stormwater Pollution Prevention Plan (SWPPP) required.	**Consistent.** The Proposed Ordinance would comply with the LAGBC that requires future development that disturb less than one acre of land and is not part of a larger common plan of development which in total disturbs one acre or more, to manage storm water drainage during construction by implementing one or more of the following measures (LAGBC, Article 9, Division 4, 99.04.106.2): Retention basins of sufficient size required to retain storm water; Where stormwater is conveyed to a public drainage system, collection point, gutter, or similar disposal method, water required to be filtered with a barrier system, wattle or other method approved by the City Where more than one acre is disturbed a SWPPP would be prepared.
	Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow.	**Consistent.** Development that occurs pursuant to the Proposed Ordinance would meet this requirement as part of its compliance with the LAGBC requirements.
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	**Consistent.** Development that occurs pursuant to the Proposed Ordinance would meet this requirement as part of its compliance with the LAGBC requirements (Article 9, Division 4, 99.04.304.1.1)
	Requires a minimum of 50% recycle or reuse of non-hazardous construction and demolition debris.	**Consistent.** Development that occurs pursuant to the Proposed Ordinance would exceed this requirement and recycle or reuse 65 percent of non-hazardous construction and demolition debris.
Climate Action Team	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	**Consistent.** Development that occurs pursuant to the Proposed Ordinance would comply with this requirement as part of its compliance with the City's requirements.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	**Consistent.** The Proposed Ordinance would not conflict with the planting of trees in public spaces.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** Development that occurs pursuant to the Proposed Ordinance would be required to comply with LAGBC Article 9, Division 4, 99.04.303.1, which requires a reduction of the overall water use of potable water within a single-family unit by at least 20%.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent.** The Proposed Ordinance would comply with the Title 24 Building Standards Code.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/ commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** Development that occurs pursuant to the Proposed Ordinance would occur in existing urbanized areas with access to regional transportation systems, and would not conflict with strategies that integrate transportation and land-use decisions.
	Reduce energy use in private buildings.	**Consistent.** Development that occurs pursuant to the Proposed Ordinance would comply with the Title 24 Building Standards Code.

Source: Impact Sciences, 2017.

As discussed in the Project Description, the PSH Ordinance would be located in urban areas (HQTAs) and would provide limited parking. PSH projects are anticipated to result in a minor increase in vehicle trips in the region, and would not substantially increase VMT from automobile use in the region. The size of PSH units is generally smaller than market rate units (200 square feet for PSH and 1,000 for affordable) in multi-unit buildings that are the most energy efficient pattern of residential development. The PSH Ordinance would result in development consistent with the 2016 RTP/SCS. Therefore, the PSH Ordinance would not result in a significant increase in GHG emissions. Thus, the Proposed Ordinance would comply with all applicable plans, policies, and programs adopted for the purpose of reducing GHG emissions. The cumulative net increase in GHG emissions, direct and indirect, would be consistent with applicable greenhouse gas reduction strategies.

Many Qualified PSH Projects are expected to be eligible for the allowable SB 375 CEQA exemption (projects located in TPAs, 200 or fewer units, 8 acres or less).

For the reasons stated above, the PSH Ordinance would result in less than significant impacts related to GHG emissions. No mitigation measures are required.

8. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Less Than Significant Impact.

A significant impact would occur if the Proposed Ordinance would result in a substantial hazard though the routine transfer, use, or disposal of hazardous materials. Any development under the PSH Ordinance would occur in conformance with all applicable local, state, and federal regulations governing such activities. All future development would be required to implement standard BMPs set forth by the Regional Water Quality Control Board (RWQCB) which would ensure that waste generated during the construction process is disposed of properly. Therefore, the Proposed Ordinance would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction and impacts would be less than significant.

Implementation of the PSH Ordinance could result in the routine transport and use of minor amounts of hazardous materials (e.g., diesel-fuel, paint and cleaning solutions). It is not anticipated that the PSH Ordinance would result in transportation of substantial amounts of excavated soil and/or groundwater containing contaminants from previously contaminated areas because these sites tend to be more expensive to develop and therefore unattractive for PSH projects. Implementation of the PSH Ordinance would likely involve the abatement and disposal of lead-based paint (LBP) and asbestos containing materials (ACMs) present in existing buildings dating from before 1978 consistent with federal and state laws. Construction activities would be required to comply with the SCAQMD Rule 1403 which regulates the removal of ACMs to ensure that asbestos fibers are not released into the air during demolition and renovation activities. California Code of Regulations (CCR) Title 8, Section 1532 et seq. requires that all LBPs be abated and removed by a licensed lead contractor.

Projects developed in accordance with the PSH Ordinance would be required to comply with applicable federal, state and local regulations for the handling and transport of hazardous materials and wastes. Therefore, impacts of the PSH Ordinance related to routine transport, use or disposal of hazardous materials or accidental hazards would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact.

Refer to **Section 8 (a)**, above, and **8(d)**, below.

The Proposed Ordinance would not 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. Impacts would be less than significant including with the imposition of MM HAZ-1.

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

Less Than Significant Impact.

As discussed above, development that occurs pursuant to the Proposed Ordinance would involve the use of those hazardous materials that are typically necessary for development of housing units (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Given the typical residential nature of PSH projects, the associated use of hazardous material, substances, or waste is not expected to result in hazardous emissions that could affect nearby schools. The Proposed Ordinance would comply with all applicable local, state, and federal laws, and regulations, that regulate and control, handling, transport and disposal of hazardous materials and hazardous waste.

All potentially hazardous materials transported, stored, or used on individual project sites for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Future development would be required to comply with all federal, state and local standards and regulations. Therefore, the 200 units that would be developed as a result of the PSH Ordinance are not expected to adversely affect existing schools in and around the Project Area. Impacts would be less than significant and no mitigation is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact With Mitigation Incorporated.

California Government Code Section 65962.5 requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of

hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.[35]

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.

The PSH Ordinance streamlines the process for the construction of PSH units which could occur on or adjacent to sites that are contaminated (buildings and/or soil and/or groundwater) due to past use or disposal of hazardous materials. However, redevelopment of contaminated sites tends to be expensive and therefore it is anticipated that PSH development would avoid heavily contaminated sites. Development in accordance with the PSH Ordinance would be required to comply with applicable federal, state, and local laws that provide for remediation of contaminated sites. Although unlikely, an impact has potential to occur if a PSH Project is constructed on a hazardous materials site. Such sites would likely be those where past industrial or other uses have occurred that used hazardous materials. In urban environments, such properties are previous or existing sites zoned for industrial uses, or previously had a gas station or dry cleaner facility on site.

The PSH Ordinance incorporates MM-HAZ-1 as a Construction Standard. MM-HAZ-1 would require that sites that would potentially have hazardous waste would be researched, and if necessary would be required to prepare Phase I and, as needed Phase II Environmental Site Assessments, and to consult with appropriate agencies and implement remediation measures to minimize human exposure and prevent further environmental contamination. Therefore, impacts of the PSH Ordinance related to hazardous material sites would be less than significant with implementation of MM-HAZ-1.

Mitigation Measure

MM-HAZ-1: Projects that involve construction-related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.2. A report setting forth the results of this database search shall be provided to the City and shall be

35 These lists include, but are not limited to, the 'EnviroStor' (http://www.envirostor.dtsc.ca.gov/public/) and 'GeoTracker' (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and the SWRCB, respectively.

made publicly available (e.g. historical environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations §312.10 Definitions). Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. All remediation shall be subject to City review and approval. Applicants shall consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination. No development shall occur until a letter of No Further Action is obtained, if required, by an appropriate agency.

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 the project result in a safety hazard for people residing or working in the project area?

No Impact.

Three airports are located within the City of Los Angeles: two public and one general aviation, respectively they are: Los Angeles International (LAX) and Van Nuys, and Whiteman Airport. Development in accordance with the PSH Ordinance is anticipated to be located in HQTAs away from airport clear zones and accident potential zones. No impact would occur.

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

No Impact.

See response to **Section 8(e)**, above. No further analysis is required.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact.

Emergency services in the City are provided by the City of Los Angeles Fire Department (LAFD) and the City of Los Angeles Police Department (LAPD). Emergency incidents of a larger natural or manmade disaster require coordinated efforts between the LAFD, LAPD and the City's Emergency Operation Center (EOS). The EOC is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the National All-Hazards approach to major disasters such as

fires, floods, earthquakes, acts of terrorism and large-scale events in the City that require involvement by multiple City departments.

The City of Los Angeles is largely developed with residential, commercial, institutional, and industrial uses. Implementation of the Proposed Ordinance would not require or result in modifications to any of the roadways that would impact emergency access. The PSH Ordinance would not result in changes to existing policies, programs, or regulations that address emergency response. Construction of PSH units that occur pursuant to the Proposed Ordinance would be reviewed by the LAFD and LAPD to ensure new development conforms to all applicable regulations (including those applicable to construction related traffic) that address emergency response and access, including the LAFD Fire Code requirements.

While road closures could occur as a result of PSH development, it is not anticipated that such closures would result in substantial delays to service providers. Any lane closures must be approved by LADOT and they would not be approved if substantial delays could result. Typically LADOT will require a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Therefore, impacts related to emergency response and access as a result of the PSH Ordinance would be less than significant. No mitigation measures are required.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant Impact.

The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Very High Fire Hazard Severity Zone comprises most of the hilly and mountainous regions of the City.

The hilly and mountainous areas of the City of Los Angeles are located within a Very High Fire Hazard Severity Zone. These areas include portions of the following communities: Baldwin Hills, Bel Air Estates, Beverly Glen, Brentwood, Castellammare, Chatsworth, Eagle Rock, East Los Angeles, Echo Park, El Sereno, Encino, Glassell Park, Granada Hills, Hollywood, Lake View Terrace Los Angeles, Los Feliz, Montecito Heights, Monterey Hills, Mount Olympus, Mount Washington, Pacific Palisades, Pacoima, Palisades Highland, Porter Ranch, San Pedro, Shadow Hills, Sherman Oaks, Silver Lake, Studio City, Sunland, Sun Valley, Sylmar, Tarzana, Tujunga, West Hills, Westwood, Woodland Hills. As described in the Project Description, Qualified PSH Projects would be located in HQTAs and therefore would not be located hilly or mountainous areas. Development in accordance with the PSH Ordinance would be required to comply with building fire codes that minimize the risk of fire. Therefore, no impact would occur and no mitigation would be required.

9. HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact.

Urban stormwater runoff from municipal storm drain systems has been identified by local regional and national agencies as one of the principal causes of water quality impacts in urban areas. Urban stormwater runoff contains a host of pollutants such as debris, bacteria, sediments, nutrients, and toxic chemicals. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations

Development in accordance with the PSH Ordinance would generally occur in urbanized areas that are already developed, covered with impervious surfaces and contributing urban runoff. Development in accordance with the PSH Ordinance would be required to comply with the following regulations (see also RCM GEO-1/HYD-1 above):

Regulatory Compliance Measures

RCM HYD-2: Stormwater Best Management Practices (BMPs) for demolition, grading, and construction activities address sediment. Sediment carries with it work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life. BMPs include:

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off- site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained.

- Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

RCM HYD-3: Prior to the issuance of a grading permit, PSH projects to comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

RCM HYD-4: If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No.CAG994004) or subsequent permit. This will include submission of Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.

RCM HYD-5: Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RCM HYD-6: Best Management Practices required to be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

Compliance with these regulations would ensure runoff would not contribute to violation of a water quality standard. Therefore, the potential for impacts related to water quality standard violations as a result of the PSH Ordinance would be less than significant. No mitigation measures are required.

b) Substantially 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 pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact.

A significant impact would occur if the Proposed Ordinance substantially depleted groundwater or interfered with groundwater recharge.

The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including water supplied by the Metropolitan Water District (MWD) (53 percent; Bay Delta 45 percent, Colorado River 8 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (34 percent), local groundwater (12 percent), and recycled water (1 percent).[36] Over the last five years, groundwater, largely from the San Fernando Basin (SFB) has provided approximately 12 percent of the total water supply for Los Angeles. Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins found primarily in the San Fernando Valley.

Development in accordance with the PSH Ordinance is anticipated to occur in urban areas on sites that are substantially covered with impervious surfaces. However, an incremental increase in impervious surfaces could incrementally interfere with groundwater recharge. As noted above, development in accordance with the PSH Ordinance would be subject to regulations that address stormwater runoff and increase groundwater recharge, including NPDES and LID requirements. Compliance with these regulations would reduce any potential impact from PSH projects to less than significant levels. The Proposed Ordinance would comply with all applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms with federal, state, regional, and local standards for sustainable management of groundwater basins, as applicable and feasible.

Therefore, impacts related to groundwater supplies would be less than significant. No mitigation would be required.

---

36 Los Angeles Department of Water and Power - Water: Facts and Figures, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=18i8d8hpzl_21&_afrLoop=430938015435485 , access June 14, 2017.

c) Substantially 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 substantial erosion or siltation on- or off-site?

Less Than Significant Impact.

Construction activities associated with the Proposed Ordinance could result in sediment loading into local waterways and the increase in the amount of surface runoff. However, urbanized areas (HQTAs) are generally well served by drainage systems and redevelopment of relatively small sites for PSH projects is anticipated to have minor effects on local drainage. Once completed, impervious surfaces (buildings, pavement, etc.) and landscaping, would minimize the potential for erosion and sedimentation in the long term.

Development under the Proposed Ordinance would be required to comply with all federal, state, and local regulations regarding stormwater runoff, including the City's LID Ordinance (during operation) and BMPs included in the Master Plan. Compliance with these regulatory measures would reduce the amount of surface water runoff leaving the Project Area after a storm event. The LID Ordinance would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period.

Therefore, development that occurs pursuant to the Proposed Ordinance would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

d) Substantially 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?

Less Than Significant Impact.

As discussed in **Section 9(c)** above, construction activities that occur pursuant to the Proposed Ordinance are not anticipated to substantially change drainage patterns. Further, Qualified PSH Projects would be required to comply with the BMPs included in the LID Ordinance and Master Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on or off-site. As such, impacts would be less than significant and mitigation would be required.

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

Less Than Significant Impact.

A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance

as defined in Section 13050 of the CWC or that cause regulatory standards to be violated. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Area were to increase to a level which exceeds the capacity of the storm drain system serving the individual project site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

Three general sources of potential short-term construction-related stormwater pollution associated with future development are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Second, the area should be secured to control off-site migration of pollutants.

While it is anticipated that most urban infill sites where PSH projects would be located would be substantially covered with impervious surfaces, there is the potential for construction activities in accordance with the PSH Ordinance to result in incremental sediment loading into local waterways and increased surface runoff. However, urbanized areas are generally well served by drainage systems and redevelopment of relatively small sites for PSH projects is anticipated to have minor effects on local drainage. Once completed, impervious surfaces (buildings, pavement, etc.) and landscaping, would minimize the potential for erosion and sedimentation in the long term.

Development in accordance with the PSH Ordinance would be required to comply with all federal, state, and local regulations regarding stormwater runoff, including NPDES regulations and the City's LID Ordinance as well as BMPs included in the City's Master Plan. Compliance with these regulatory measures would reduce the amount of surface water runoff after a storm event. The LID Ordinance requires preparation of a Stormwater Management Plan and implementation of stormwater BMPs to retain or treat runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, development in accordance with the PSH Ordinance would result in less than significant impacts related to potential alteration in drainage patterns or otherwise

degrading water quality would be less than significant. No mitigation measures are required.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact.

A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. As described above, development under the Proposed Ordinance does not include a potential source of contaminants, which could potentially degrade water quality and would comply with all federal, state and local regulations governing stormwater discharge. As described above, all the Qualified PSH Projects would be subject to numerous regulatory requirements. Impacts would be less than significant, and no mitigation is required.

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

No Impact.

The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk.

Portions of the City are within and identified 100 and 500-Year floodplain.[37, 38]

Development in accordance with the PSH Ordinance is required to be located in HQTAs and therefore no impacts with respect to housing in flood hazard area are anticipated. In addition, most PSH sites are anticipated to be small and unlikely to impede or redirect flood flows. Urbanized areas of the City of Los Angeles including HQTAs are subject to Flood Management Plans and major flood control infrastructure has been constructed to constrain the 100-year flood hazard area in to flood control systems. The City of Los Angeles is within the Los Angeles Flood Control District which includes drainage infrastructure designed to handle water flow from storm drains and other runoff. To minimize impacts to properties located in areas prone to flooding, mudflow, and coastal inundation, the City adopted the 1980 Flood Hazard Management Specific Plan and amended it in 1988 (Ordinance No. 163,913).[39] The amendment requires properties that are located in areas prone to flooding, mudflow, and/or coastal

37 A 100-Year flood is a flood which results from a serve rainstorm with a probability of occurring approximately once every 100 years.

38 A 500-Year flood is a flood which results from a severe rainstorm with a probability of occur once every 500 years.

39 City of Los Angeles General Plan Safety Element, p. II-15.

inundation to undergo additional permit review and implement measures (as necessary), including structure reinforcement, increased base elevation (compared to existing regulations), anchoring, and installation of protective barriers. Development in accordance with the PSH Ordinance would be required to comply with applicable federal, state, and local floodplain regulations. Therefore, there would be no impacts from development of housing in accordance with the PSH Ordinance in flood zones. No mitigation measures are required.

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

No Impact.

See response to **Section 9(g)**, above. There would be no impacts and no further analysis is required.

i) 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?

No Impact.

See response to **Section 9(j)**, below.

j) Inundation by seiche, tsunami, or mudflow?

No Impact.

A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

Seiches can occur in areas adjacent to water storage facilities. Inundation from a seiche can occur if a wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. LADWP regulates the level of water in its storage facilities and provides walls of extra height to contain seiches and prevent overflow. In addition, the LADWP monitors dams and reservoirs during storm events and implements mitigation measures to prevent potential overflow.[40]

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

40 City of Los Angeles General Plan Safety Element, p. II-16.

exacerbated condition on future residents and users of a project, as well as other impacted individuals.

Development in accordance with the PSH Ordinance could occur in areas susceptible to impacts from seismic activity including seiches, tsunamis, or mudflow, but such development would not be expected to exacerbate impacts.

The City of Los Angeles Flood Hazard Specific Plan, including Ordinance No. 163,913, sets forth design criteria for development in areas subject to flooding, mud flow and in coastal zones, including increased base building elevations. In addition, the Army Corps of Engineers (ACOE) is responsible for constructing and maintaining the breakwaters designed to mitigate damaging wave action, particularly in the harbor area. The Harbor Department works cooperatively with the ACOE relative to maintenance and protection of the breakwater facilities. Along with the fire and police departments, it participates in the federal tsunami alert program to warn potentially affected properties and harbor tenants of tsunami threats and to advise them concerning protective response actions.

Development in accordance with the PSH Ordinance would result in no impacts related to failure of a levee or dam or by inundation by seiche, tsunami, or mudflow.

10. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact.

The PSH Ordinance is not a project that would result in a physical division of an existing community. Moreover, development in accordance with the PSH Ordinance would occur within existing urbanized areas in proximity to transit; these relatively small developments in urbanized areas would not have the potential to divide communities. The PSH Ordinance would encourage walkability through increased density and by encouraging development near transit. Potential PSH Sites as described in the Project Description would be located in HQTAs, which are generally fully developed. Qualified PSH would be allowed to replace non-conforming Residential Hotels in zones that do not currently allow residential use, and would allow PSH in the PF (Public Facilities zone) if permitted in an adjoining zone. Such uses are not anticipated to result in land use conflicts because the PSH use would either be a continuation of an existing similar use (residential hotel) or compatible with allowable uses on adjacent sites. Other than replacement of a Residential Hotel use and development in a PF zone (as described above), any projects that are not consistent with zoning (and therefore with the potential to disrupt an existing neighborhood) would be subject to the City's process for zone changes. Therefore, development in accordance with the PSH Ordinance would not create a physical barrier to divide established communities. There would be no impacts related to dividing an established community. No mitigation measures are required.

b) 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?

No Impact.

Development in accordance with the PSH Ordinance would occur primarily in urbanized areas close to transit. The PSH Ordinance would be consistent with local land use plans, goals, and policies calling for higher density and more compact, mixed-use development served by high-quality transit and bicycle and pedestrian improvements. The PSH Ordinance would amend Sections 12.03, 12.04.09, 14.00 and 16.05 of the LAMC to establish regulations that define PSH and project eligibility criteria and establish unique development standards for PSH that facilitate ministerial approval. The PSH Ordinance would add to Section 12.04.09 a provision to allow PSH development in a Public Facilities Zone in accordance with the least restrictive adjoining zoning. Consistent with State Density Bonus Law, the PSH Ordinance would provide for reduced parking requirements as well as additional incentives/concessions (up to four per project) with respect to the Zoning Code, including up to 20 percent decrease in

required setbacks, up to 20 percent reduction in required open space, up to 20 percent increase in lot coverage, up to 35 percent increase in FAR, and depending on the height district up to a 35 percent increase in height -- one to two stories. These changes would not result in conflicts with overlying policies that reduce impacts and ensure compatibility of land uses, and the regulations of any applicable overlay (including the Coastal Zone) would still apply to individual projects. The PSH Ordinance is in substantial conformance with the purpose, intent and provisions of the General Plan, as well as in conformance with the public necessity, convenience, general welfare and good zoning practice. The PSH Ordinance meets the intent of the General Plan Framework Element to encourage the creation of an equitable distribution of housing opportunities for households of all types and incomes, while at the same time promoting livable neighborhoods. The PSH Ordinance would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by expanding the supply of PSH throughout the City, and by reducing zoning and other regulatory barriers to the placement and operation of PSH in appropriate locations. Therefore, the PSH Ordinance would have less than significant impacts with respect to plan consistency. No mitigation measures are required.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact.

As previously stated in **Section 4, Biological Resources,** the City has not adopted a Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, implementation of the Proposed Ordinance would not conflict with the provisions of an adopted Habitat Conservation Plan. No impacts would occur and no mitigation would be required.

11. MINERAL RESOURCES

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact.

Portions of the San Fernando Valley as well as portions of the area immediately adjacent to the Ventura Freeway (State Route 134), the Golden State Freeway (Interstate-5), and the Harbor Freeway (State Route 110) are designated as Mineral Resource Zone-2 (MRZ-2).[41] According to the Surface Mining and Reclamation Act, MRZs-2 zones are areas where significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.[42] In addition, some urbanized areas in the City of Los Angeles are zoned for oil drilling use including the Mid-Wilshire area, Mid-City area, and Venice area. While mineral resource extraction zones (i.e., MRZ-2 and oil extraction) exist throughout the City, the potential PSH sites are not currently in use for mineral extraction. Most of the sites include the conversion of existing urbanized uses or infill development on sites zoned for a multi-family residential use. It is not expected that any sites that are in use for mineral extraction would be converted to PSH, in part because mineral extraction is generally not consistent with urban uses and most PSH projects would be in TPAs. Therefore, the anticipated development of PSH projects in urbanized areas would no significant impact on mineral resources and mineral resource recovery.

b) Result in 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?

No Impact.

See response to **Section 11(a)**, above.

---

41 City of Los Angeles General Plan, Conservation Element, Exhibit A Mineral Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed June 3, 2017.

42 Department of Conservation, SMARA Statutes and Associated Regulations, http://www.conservation.ca.gov/omr/lawsandregulations, accessed June 3, 2017.

12. NOISE

Would the project would result in:

a) 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?

No Impact.

Construction: As discussed in the Project Description, the 2,000 units that could be constructed as a result of the Proposed Ordinance likely would be added to projects already anticipated to be constructed as a result of Measure HHH.

LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday. Demolition and construction activities are prohibited on Sundays and all federal holidays. The construction activities associated with development in accordance with the PSH Ordinance would comply with these LAMC requirements.

PSH projects would also be required to comply with other sections of the Municipal Code regulating noise (Sections 111.0 through 116.01). Construction noise greater than 75 dBA at 50 feet is prohibited between the hours of 7 a.m. and 10 p.m. within 500 feet of a residential zone unless compliance is technically infeasible. It is unlawful for any person to make loud, unnecessary and unusual noise that disturbs the quiet of any neighborhood.

In addition to on-site construction noise, off-site construction-related noise impacts from haul trucks could temporarily increase ambient noise levels at nearby sensitive receptors. Haul truck operators would be required to comply with the City's DBS Haul Route Monitoring Program, including complying with the City's Good Neighbor Construction Practices.

Based on the above, there is no basis to foresee that the PSH Ordinance would exceed the City's noise ordinance.

Operation: Upon completion and operation of Qualified PSH Projects, on-site operational noise would likely be generated by heating, ventilation, and air conditioning (HVAC) equipment. The operation of on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Noise from on-site equipment would not be expected to generate noise levels in excess of standards established in the City's General Plan or noise ordinance.

Development in accordance with the PSH Ordinance would add housing in urbanized areas that have pedestrians and bicycle facilities and are serviced by local transit services. Individual PSH projects would not be expected to increase noise levels in excess of standards established the City's noise ordinances. Therefore, operational impacts associated with development in accordance with the PSH Ordinance would be less than significant.

Regulatory Compliance Measures

RCM NOI-1: LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. Demolition and construction activities are prohibited on Sundays and all federal holidays.

RCM NOI-2: LAMC Sections 111.0 through 116.01 require that construction noise greater than 75 dBA at 50 feet is prohibited between the hours of 7 am and 10 pm within 500 feet of a residential zone unless compliance is technically infeasible. It is unlawful for any person to make loud, unnecessary and unusual noise that disturbs the quiet of any neighborhood.

RCM NOI-3: PSH projects are required to comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

RCM NOI-4: LAMC Section 112.02 requires that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact with Mitigation Incorporated.

Construction: Ground-borne vibration would be generated by on-site construction activities of PSH projects. **Table 11** shows vibration levels associated with typical construction equipment

Ground-borne vibration is generated by a number of on-site construction activities. At 25 feet, construction activity can generate up to 0.089 inches per second (Tables 12). This vibration intensity is below the 0.5 inches per second PPV building damage threshold for residential structures. The Proposed Ordinance (and MM- NOI-1) prohibits pile driving unless required by geologic conditions. If required by geologic conditions it requires quiet techniques be used. Pile driving can generate vibration levels above 0.5 inches per second; typically pile driving results in vibration levels of 0.644 inches per second at 25 feet and can result in vibration levels up to 1.518 inches per second.[43]

Therefore, groundborne vibration associated with individual PSH project construction would be less than significant.

Table 11
Construction Equipment Vibration Levels (PPV)

Equipment	Approximate PPV (in/sec) at 25 Feet At 25 Feet
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Source: Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

Based on mitigation in the 2016 RTP/SCS PEIR the Proposed PSH Ordinance prohibits pile driving except in very limited circumstances, see MM- NOI-1 below.

Operation: PSH projects would not have significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Development in accordance with the PSH Ordinance would provide housing in urbanized areas with developed pedestrians and bicycle facilities and serviced by local transit services. Individual PSH projects would not generate significant vehicular trips and therefore would not have the potential to expose nearby land uses and other sensitive receptors to perceptible vibration levels. Therefore, operational groundborne vibration associated with the PSH Ordinance would be less than significant. No operational mitigation measures are required

43 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, 2006.

Mitigation Measure

MM-NOI-1: No pile driving shall be allowed unless required due to geological conditions. For projects where piles would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as vibratory piles.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact.

According to the Los Angeles CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speed and fleet mix remain constant. The Proposed Ordinance is anticipated to result in the addition of approximately 3,664 daily trips. [44] These trips would be dispersed across the different PSH Project sites; therefore, their addition to the local roadways would not double any one roadway's traffic volumes. As a result, the project's noise long-term operational noise impacts would be considered a less than significant impact.

Other permanent increases in operational noise include heating, ventilation and air conditioning (HVAC) systems, and car door slamming noise. Automobile activity would be very infrequent. Additionally, HVAC systems are regulated the LAMC and are anticipated to located on the rooftops of the project sites, and shielded by rooftop parapets from sensitive receptors. Neither of these noise sources would increase ambient noise levels by 3 dBA or greater.

As a result, the project's impacts related to permanent increase in ambient noise would be considered less than significant.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact.

Construction of PSH projects would generate noise from a variety of on- and off-site activities. Typical sound levels associated with construction equipment are shown in **Table 12, Construction Equipment Noise Levels.**

---

44 Trip generation rates from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016. Peak hour trip generation would be 0.12 trips per unit for PSH units and 0.5 trips per unit for family units; daily trip generation would be 1.27 trips per day PSH and 4.08 trips per day per family unit. For a total of 2,000 units: total daily trips: 1,600 single units x 1.27 = 2,032 trips daily trips; 400 family units x 4.08 = 1,632 trips daily trips, = 3,664 total daily trips.

Table 12
Construction Equipment Noise Levels

Type of Equipment	Typical Measured Noise Level (dBA at 50 feet from Source)
Air Compressor, Generator	81
Backhoe, Tie handler	80
Ballast Equalizer, Concrete Pump, Compactor, Shovel	82
Ballast Tamper, Scarifier, Crane Mobile	83
Concrete Mixer, Grader, Pneumatic Tool, Impact Wrench, Dozer, Tie Inserter, Loader	85
Concrete Vibrator, Pump, Saw	76
Jack Hammer, Crane Derrick, Truck	88
Paver, Scraper	89
Pile-driver (Impact)	101
Pile-driver (Sonic)	96
Rail Saw	90
Rock Drill	98
Roller	74
Spike Driver	77
Tie Cutter	84

Sources: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

Redevelopment in urban infill locations is very common and usual within the City and the associated short-term construction activities are not considered unusual or significant impacts.

Existing noise levels on sites where PSH is anticipated to occur are 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.

As discussed above, construction activities associated with the Proposed Ordinance, including required Construction Standards (shown here as MM-NOI-1) would not result in significant temporary noise impacts. Temporary noise levels associated with the Proposed Ordinance would be less than significant with mitigation incorporated. In addition, all stationary equipment (primarily anticipated to be HVAC equipment) would be required to not exceed 5 dBA above ambient noise levels (see regulatory requirement RCM NOI-4 above). Development in accordance with the PSH Ordinance would result in less-than-significant impacts with respect to operational increases in noise. No mitigation measures are required.

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 the project expose people residing or working in the project area to excessive noise levels?

No Impact.

The SCAG 2016 RTP/SCS PEIR projects a 7 percent decrease in regional passenger demand for air travel in the year 2040 as compared to the year 2035 analyzed in the 2012 RTP/SCS.[45] The Proposed Ordinance would provide permanent housing for very- and extremely-low income residents already living within the region. Construction of 2,000 units of PSH housing would not increase the demand for air travel. Additionally, major airports have an airport land use plan that provides guidance on noise levels and land use in adjacent areas. If a site would locate residents within the vicinity of a major airport, the project site would be subject to the guidance provided in the airport land use plan.[46] Therefore, impacts would be less than significant, and the consideration of mitigation measures is not required.

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?

No Impact.

As previously discussed above, the SCAG 2016 RTP/SCS PEIR projects a 7 percent decrease in regional passenger demand for air travel. The Proposed Ordinance would not increase the demand for air travel. Impacts would be less than significant, and the consideration of mitigation measures is not required.

---

[45] Southern California Association of Governments, *2016 RTP/SCS Draft PEIR*, December 2015.

[46] Ibid.

13. POPULATION AND HOUSING

Would the project:

a) 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)?

Less Than Significant Impact.

PSH is a type of affordable housing for the formerly or chronically homeless. The PSH Ordinance would not induce substantial population growth, as it would serve an existing population located within the City of Los Angeles. These units would provide new housing for the homeless population that currently exists and is therefore not anticipated to induce substantial population growth. Some homeless population could seek to move in to the area in search of PSH housing, but this population is not very mobile and it is not anticipated to be a large impact. Further, development in accordance with the PSH Ordinance would not displace existing housing or people, through the conversion of existing housing. While some of the units are anticipated to be the result of the rehabilitation of existing structures, in general, it is anticipated that vacant structures would be rehabilitated and the conversion of existing housing to residential would not occur. As indicated in the Project Description, Potential PSH sites include excess City properties and underutilized infill sites zoned for multifamily use. Development in accordance with the PSH Ordinance would help to provide shelter for the existing homeless population. Therefore, the PSH Ordinance's impacts related to population and housing would be less than significant. No mitigation measures are required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact.

See discussion under 13 a) above.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. See response above.

No impact would occur and no further analysis is required.

14. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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:

i) Fire protection?

Less Than Significant Impact.

The PSH Ordinance would be implemented on underutilized parcels within the City of Los Angeles, and would therefore contribute to the infill and compact development in an urbanized area. Development in accordance with the PSH Ordinance would include rehabilitation of underutilized parcels in urbanized areas in proximity to transit. In general, urban areas are well served with fire protection services. Further, the goal of PSH is to remove homeless persons from the streets where they are currently living (i.e., accommodating an existing population). It is far more likely that those living on the streets would require public services such as emergency response due to exposure to weather conditions and other dangerous factors than they would require in PSH. Once housed, the PSH population would have access to on-site services, which would also reduce the need for additional emergency personnel. Therefore, PSH projects would not result in the need for new or expanded fire protection services such that new or physically altered fire protection facilities will not be required.

LAFD operates 114 stations throughout the city. Development in accordance with the PSH Ordinance would be required to comply with applicable provisions of the LAMC Fire Code, including, but not limited to, installation of an automatic sprinkler system, smoke detectors, and a fire alarm system. Therefore, the PSH Ordinance would result in less than significant impacts related to fire protection; no mitigation measures are required.

ii) Police protection?

Less Than Significant Impact.

The LAPD is responsible for providing police protection services to the City. Similar to fire services, the developments of PSH units are not expected to induce population growth but instead house existing homeless populations into permanent shelters and reduce the need for police services. Therefore, development in accordance with the PSH Ordinance would result in less than significant impacts related to police protection.

iii) Schools?

Less Than Significant Impact.

The PSH Ordinance would provide shelter to the existing homeless population within the City. In most cases, the homeless population that would use PSH units would be above 18, the typical age in which youth matriculate out of the public school system. While some units in PSH projects could be affordable and include families, it is assumed that this population is already present in the City and already attends local schools. Therefore, the implementation of the Proposed Ordinance would have no impact to school services. Impacts would be less than significant, and no mitigation would be required.

iv) Parks?

Less Than Significant Impact.

A significant impact would occur if the PSH Ordinance resulted in substantial population growth that would generate a demand for recreation and park services. As discussed above, the Proposed Ordinance would not induce substantial population growth and would house the existing homeless population, some of whom are likely using public parks and similar facilities for shelter, in permanent shelters. Impacts on park and recreation facilities would be less than significant and no further analysis is required.

v) Other Public Facilities?

Less Than Significant Impact.

A significant impact would occur if the PSH Ordinance resulted in substantial population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the project area. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services. Los Angeles. LAPL provides services at the Central Library, eight Regional Branch Libraries and 64 Community Branch Libraries.

As there would not be a substantial increase in population associated with the PSH Ordinance, there would be no need for additional library resources or facilities. Impacts would be less than significant and no further analysis is required.

15. RECREATION

a) **Would the project 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?**

Less Than Significant Impact.

The City of Los Angeles Department of Recreation and Parks operates and maintains over 16,000 acres of parkland, hundreds of athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, and nine dog parks throughout the Project Area.

As discussed in **Section 15, Public Services,** the PSH Ordinance would not induce substantial population growth within the City. Developments in accordance with the PSH Ordinance would house the existing homeless population, some of whom are likely using public parks and similar facilities for shelter, in permanent shelters. Therefore, impacts would be less than significant, and no mitigation is needed.

b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact.

The Proposed Ordinance would facilitate the development of approximately 2,000 PSH units per year. The ordinance would not result in increased recreational facilities, nor the construction or expansion of recreational facilities. Furthermore, as stated above, the Proposed Ordinance would not induce substantial population growth within the City. Impacts would be less than significant, and mitigation measures would not be needed.

16. TRANSPORTATION AND TRAFFIC

Would the project:

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?

Less Than Significant Impact.

The PSH Ordinance would allow for reduced parking spaces for PSH and affordable dwelling units (zero spaces for PSH units, and for affordable units 0.5 spaces per unit within 0.5 miles of transit; 1 space per unit otherwise). The Proposed Ordinance would develop housing units within walkable and transit serviced areas. Therefore, traffic volumes are not expected to significantly increase as a result of the Proposed Ordinance. Each PSH Project is anticipated to generate less than 10 peak hour trips[47] (25 peak hour trips is the threshold for preparing a traffic analysis for a development project to determine whether an individual project could impact the nearby roadway network). Operation of 2,000 PSH Units is estimated to result in 3,664 daily trips.[48] Trips from individual projects would be distributed throughout the City, and would have a negligible impact on the transportation network. Loss or increase in parking is not a CEQA impact unless it results in secondary impacts. Although the PSH Ordinance reduces parking standards for PSH projects, this is not expected to result in secondary traffic impacts based on evidence demonstrating that PSH residents have reduced vehicle ownership than other types of housing. Therefore, impacts to traffic would be less than significant. No mitigation measures are required

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?

Less Than Significant Impact.

---

47 Assuming 75 units comprised of 60 PSH units and 15 family affordable units, peak hour trip generation would be: 60 x 0.12 = 1.92 trips, plus 15 x 0.5 = 7.5, for a total of 9.42 units; daily trip generation would be 60 x 1.27 = 76.2, plus 15 x 4.08 = 61.2, for a total of 137.4 daily trips per PSH project. This trip generation rate from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016.

48 Trip generation rates from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016. Peak hour trip generation would be 0.12 trips per unit for PSH units and 0.5 trips per unit for family units; daily trip generation would be 1.27 trips per day PSH and 4.08 trips per day per family unit. For a total of 2,000 units total daily trips: 1,600 single units x 1.27 = 2,032 trips daily trips; 400 family units x 4.08 = 1,632 trips daily trips = 3,664 total daily trips.

CMP Traffic Impact Analysis (TIA) Guidelines require that intersection monitoring locations must be examined if an individual development project will add 50 or more trips during either the AM or PM weekday peak hours. Traffic volumes in conjunction with development of PSH units that occur pursuant to the Proposed Ordinance would be minimal (as analyzed above) and would not meet the CMP TIA Guidelines requiring intersection monitoring. As mentioned above, most vehicle trips to and from the PSH units would be from service/maintenance workers. There would be less than significant impacts to applicable congestion management programs. No mitigation measure would be needed.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact.

Three airports are located in the City of Los Angeles, two public airports and one general aviation airport: LAX, Van Nuys Airport, and Whiteman Airport. Development in accordance with the PSH Ordinance would occur in urbanized areas in proximity to transit (HQTAs), where risk associated with air traffic patterns is low. Therefore, implementation of the PSH Ordinance would have less-than-significant impacts related to air traffic patterns. No mitigation measures are required.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact.

Development in accordance with the PSH Ordinance is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The PSH Ordinance 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 PSH Ordinance would have no impacts related to design feature hazards. No mitigation measures are required.

e) Result in inadequate emergency access?

Less Than Significant Impact.

The City has designated disaster routes throughout the project area through the Safety Element of the City General Plan. Construction of future projects could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to access standards to allow adequate emergency access. Compliance with access standards, including the City's DBS Haul Route Monitoring Program would reduce potential impacts on roadways designated as haul routes and emergency response services during construction of future projects.

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 LADOT and they would not be approved if substantial delays could result. Typically LADOT will require 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 PSH projects. Therefore, implementation of the PSH Ordinance would have less-than-significant impacts related to emergency access. No mitigation measures are required.

Regulatory Compliance Measures

RCM TR-1: A construction work site traffic control plan is required to be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans must show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties, as applicable to individual project construction plans. All construction related traffic is restricted to off-peak hours.

f) Conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact.

Development in accordance with the PSH Ordinance would result in the conversion of underutilized lots primarily in urban areas. Qualified PSH projects are required to be located in close proximity to transit and therefore would not conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities and would not decrease the performance or safety of such facilities. Therefore, the PSH Ordinance would have no impacts related to policies, plans, and programs supporting transit, bicycle and pedestrian facilities. No measures are required.

17. TRIBAL CULTURAL RESOURCES

Would the project affect:

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

Less Than Significant Impact with Mitigation Incorporated.

Historical buildings suitable for adaptive reuse are not anticipated to be an issue with respect to tribal cultural resource impacts. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. In general, it is expected that most PSH project sites would have been previously disturbed. Further, individual projects are not expected to include substantial parking that would necessitate the construction of underground parking (due to the relaxed parking requirements) that would require excavation below previously disturbed soils. Therefore, the potential for uncovering previously unidentified tribal cultural resources is low. When excavation is required below depth previously identified depths, notice to tribes will be provided and a Tribal Monitor may be required as detailed in MM-TCR-1. Specifically, MM-TCR-1 requires where excavation could extend below previously disturbed levels, notification be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed PSH project (if the Tribe has submitted a request in writing to be notified of proposed projects in that area) and a Tribal Monitor will be required. Therefore, the Proposed Project would have less-than-significant impact related to tribal cultural resources.

Mitigation Measure

MM-TCR-1: Where excavation could extend below previously disturbed levels, notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site, if the Tribe has submitted to the Department of City Planning a request in writing to be notified of proposed projects in that area. If the potential for tribal resources exists, excavation in previously undisturbed soils shall be monitored by a qualified Tribal Monitor. If tribal resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until an appropriate Tribal Representative has evaluated the find. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the Project site. Any tribal resources shall be treated with appropriate dignity and protected and preserved as appropriate.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact with Mitigation Incorporated.

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a Proposed Ordinance if the Tribe has submitted a request in writing to be notified of Proposed Ordinances. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site. In accordance with AB 52 notice of the PSH Ordinance has been provided to tribes who have requested such notice in the City of Los Angles. In addition, for individual PSH Projects, affected tribes would be notified in accordance with MM- TCR-1.

The potential impacts to tribal cultural resources from implementation of the Proposed Ordinance would be less than significant with MM-TCR-1, which is imposed as a construction standard by the PSH Ordinance.

18. UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact.

Wastewater generated in the City is primarily treated at the Hyperion Treatment Plant in Playa del Rey. Wastewater reclamation plants that comprise the Hyperion Service Area have a total design capacity of 580 million gallons of wastewater per day (MGD). The City of Los Angeles Integrated Resources Plan indicates by the year 2020, projected wastewater flows would total approximately 531 MGD.[49] The RWQCB regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The Hyperion Treatment Plant is responsible for adhering to RWQCB regulations as they apply to wastewater generated in the Project Area.

Development in accordance with the PSH Ordinance would be well within the expected growth in the City of Los Angeles and region, and would not exceed the RWQCB standards for treatment of wastewater or the wastewater treatment capacity. Additionally, water conservation practices and compliance with best management practices (i.e., low flow toilets and automatic sinks) are likely to substantially reduce wastewater. Therefore, impacts related to wastewater treatment facilities would be less than significant. No mitigation is required.

Regulatory Compliance Measure

RCM UTIL-1: As part of the normal construction/building permit process, Applicants are required to confirm that the capacity of the existing wastewater infrastructure system can supply the needs of projects during construction and operation.

b) 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?

Less Than Significant Impact.

Wastewater. Development in accordance with the PSH Ordinance would occur in urbanized areas and would be expected to connect to the existing sewer lines. The size of individual PSH 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

---

49 City of Los Angeles, Department of Public Works, Bureau of Sanitation, Integrated Resources Plan Executive Summary, December 2006, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010372.pdf

the PSH Ordinance would be required to comply with all applicable City regulations. It is estimated that the City would not outgrow its wastewater treatment capacity by the year 2028 especially given aggressive water conservation strategies. Therefore, the PSH Ordinance would result in less than significant impacts related to wastewater facilities. No mitigation measures are required.

Water. The LADWP provides water service to the City. Water would be conveyed to PSH projects along existing circulating water mains of varying sizes. The LADWP has an ongoing program of facility replacement and upgrades to meet the anticipated water demands based upon the City's adopted General Plan Framework Element. The LADWP can supply water to development projects that are consistent with SCAG growth assumptions contained in the Urban Water Management Plan; development in accordance with the PSH Ordinance would be consistent with SCAG's growth assumptions. Development in accordance with the PSH Ordinance would be required to comply with water conservation requirements, and ensure that adequate infrastructure exists. Therefore, the PSH Ordinance would result in less than significant impacts related to water conveyance facilities. No mitigation measures are required.

Regulatory Compliance Measures

RCM UTIL-2: Projects are required to comply with the Water Management Ordinance, No. 170,978, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

RCM UTIL-3: As part of the normal construction/building permit process, Applicants are required to confirm that the capacity of the existing water infrastructure system can supply the needs of projects.

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

Less Than Significant Impact.

Development that occurs in accordance with the PSH Ordinance would occur in existing urbanized areas and is not anticipated to result in a significant increase in individual site runoff or changes to the local drainage patterns. Runoff from individual PSH sites would continue to be collected and directed towards existing storm drains. In addition, development in accordance with the PSH Ordinance would be required to comply with existing local, state, and federal regulations to mitigate potential stormwater impacts.

To comply with the City's Green Building Code, future development that disturbs less than one acre of land and is not part of a larger common plan of development which in total disturbs one acre or more, would be required to manage stormwater drainage during construction by implementing one or more of the following measures:

- Retention basins of sufficient size shall be utilized to retain stormwater on the site;
- Where stormwater is conveyed to a public drainage system, collection point, gutter, or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the City
- Compliance with the City's stormwater management ordinance.

All PSH construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during the rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with City grading regulations, construction impacts related to stormwater discharge would be less than significant.

In accordance with the City's LID Ordinance, individual PSH projects would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Therefore, the PSH Ordinance would result in less than significant impacts with respect to stormwater facilities. No mitigation measures are required.

d) Have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact.

The California Urban Management Planning Act requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (afy) of water to prepare an UWMP. When preparing an UWMP and projecting the area's future water demand, water agencies must consider demographic factors including expected population and housing growth. The 2015 UWMP prepared by LADWP includes estimates of past, current, and projected probable and recycled water use, identifies conservation and reclamation measures currently in practice, describes alternative conservation measures, and provides an urban water shortage contingency plan.

Water supply in the City is provided by the LADWP. The LADWP continuously upgrades water infrastructure and facilities to ensure the City's anticipated water demands can be met. In addition, as required by the California Urban Management Planning Act, the LADWP releases an updated UWMP every five years. The main goal of the UWMP is to forecast future water demands and water supplies under average and

dry year conditions; identify future water supply projects such as recycled water; provide a summary of water conservation BMPs; and provide a single and multi-dry year management strategy.[50] When projecting water demand the LADWP considers demographics, socioeconomics, conservation regulations, historical weather patterns, and non-revenue water (e.g., the difference between total water consumption and billed water use).[51] The 2015 UWMP is the latest UWMP prepared by LADWP. According to LADWP, there are adequate supplies available to serve City needs through 2040. The LADWP provide water for the growth planned.

Development in accordance with the PSH Ordinance would be consistent with growth assumed in the UWMP. Development in accordance with the PSH Ordinance would comply with City water conservation requirements to reduce overall water consumption from each development. Therefore, the PSH Ordinance would result in less than significant impacts with respect to water supply. No mitigation measures are required.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact.

See **Response 19(a)** above.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

g) Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact.

Solid waste collected throughout the City by private and public haulers is disposed of at facilities (e.g., landfills and incinerators) owned and operated by Los Angeles County (County), as well as in landfills located in surrounding counties. While the majority of the solid waste generated by local jurisdictions is disposed of at facilities owned, operated, and located in the County, the County has established importation agreements with several surrounding counties including, Kern, Orange, Riverside, San Bernardino, and Ventura. In 2015 the County exported 4,127,261 tons of solid waste, approximately 42 percent of the total solid waste collected, to surrounding counties' Class III landfills.[52]

---

50 City of Los Angeles Department of Water and Power, *Draft 2015 UWMP*, February 2016.

51 City of Los Angeles Department of Water and Power, *Draft 2015 UWMP*, February 2016.

52 Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2015 Annual Report, Table "Annual Disposal of Tonnage for 2015."

In 2015, residents and businesses in the City generated a total of 3,817,695 tons of solid waste.[53] The Sunshine Canyon Landfill was the primary disposal facility for the City in 2015; accepting 1,512,000 tons of solid waste.

The Azusa Land Reclamation Landfill is the only facility owned and operated by the County that accepts inert waste. In 2015, the total amount of inert waste collected countywide was 308,790 tons, and the remaining capacity of this landfill was estimated to be 57.56 million tons.[54] Further, several additional inert facilities are located throughout the County and operate under a state permit, including Durbin Landfill located in the City of Irwindale, Sun Valley Landfill located in the City of Los Angeles, and Chandler's Palos Verdes Sand and Gravel located in the City of Rolling Hills Estates.[55] Inert waste collected in the County can be disposed of at these facilities.

In 2007, the City of Los Angeles initiated a Solid Waste Integrated Resource Plan (SWIRP) with goals of moving toward zero waste by 2030. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70 percent of the solid waste generated in the City by 2013, diverting 90 percent by 2025, and becoming a zero waste city by 2030.

Construction activities associated with development that occurs pursuant to the Proposed Ordinance would generate inert waste. Construction waste materials are expected to be typical construction debris, including wood, paper, glass, plastic, metals, cardboard, and green wastes. Pursuant to the California Green Building Code, individual project applicants would be required to recycle/divert 65 percent of the construction waste. Construction and operation of PSH units would be required to comply with all applicable regulations related to solid waste, including County and City General Plans, and goals and policies for recycling and diversion of solid waste to ensure compliance with the California Integrated Waste Management Act (AB 9393), the California Solid Waste Reuse and Recycling Act, and the Solid Waste Diversion Rule (AB 341).

The remainder would be disposed of in a Class III landfill. As the remaining tonnage in 2014 for Azusa Land Reclamation Landfill was approximately 57 million tons for inert waste, there is ample capacity for construction waste that would be generated by construction activities undertaken in accordance with the PSH Ordinance. Development undertaken in accordance with the PSH Ordinance would produce waste typical of PSH units that would be disposed in the Sunshine Canyon Landfill. Individual PSH projects

---

53 Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2015 Annual Report

54 Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2014 Annual Report, Table "Annual Disposal Tonnage for 2014."

55 Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2015 Annual Report

would be required to comply with the CalGreen Building Code, which requires diversion and recycling of waste to the maximum extent feasible.

Operationally, the Proposed Ordinance would produce waste typical of PSH units that would be disposed in the Sunshine Canyon Landfill, as a majority of the City's solid waste is disposed of in the Sunshine Canyon Landfill.[56] However, depending on with whom the hauler has contracts, the waste could be sent to Chiquita Canyon, Simi Valley, or any of a number of other sites.

The County identifies landfill capacity in 15 year planning periods, the most recent of which ends in 2027.[57] Recent landfill expansion approvals and proposal for expansion at existing County landfills indicate that solid waste disposal facilities and other waste management options will be available beyond this date as new facilities and technologies are created to meet demand. Further, the County completes annual reviews of solid waste demand and existing capacity (of each facility) in each subsequent annual report, to ensure the solid waste generated in the County can be properly disposed of at existing solid waste facilities. Thus, sufficient capacity remains at the existing solid waste facilities, necessary to accommodate the solid waste generated during operation of the Proposed Ordinance. There would be no impacts, and no mitigation would be required.

Regulatory Compliance Measure

RCM UTIL-4: All waste required to be disposed of properly. Use of appropriately labeled recycling bins is required to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

(Operational.) Recycling bins to be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.

(Demolition/Construction.) Prior to the issuance of any demolition or construction permit, Applicants shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and

---

56 City of Los Angeles, 2013 Zero Waste Progress Report, http://www.forester.net/pdfs/City_of_LA_Zero_Waste_Progress_Report.pdf, accessed May 5, 2016.

57 County of Los Angeles Department of Public Works, Los Angeles County Integrated Waste Management Plan 2012 Annual Report.

Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes. To facilitate on-site separation and recycling of demolition- and construction-related wastes, contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

19. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact.

Construction activities associated with the Proposed Ordinance would not impact any endangered fauna or flora, modify any special status species habitat, and would only occur on lots deemed suitable for PSH development by the City, (i.e., infill lots zoned for multifamily use). Due to the general urban and built nature of the City, construction activities and operation of future development would not impact the habitat or population. The PSH Ordinance would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Section 5, Cultural Resources** and **Section 17, Tribal Cultural Resources**, potential impacts related archaeological and paleontological resources and tribal cultural resources would be less than significant with mitigation. With Construction Standards incorporated in to the PSH Ordinance all impacts are anticipated to be less than significant. (The Construction Standards identified in the PSH Ordinance are based on the mitigation measures identified herein, which in turn are refinements to mitigation measures identified in the 2016 RTP/SCS PEIR.) No further analysis is required.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

No Impact.

PSH is one component of growth in the City of Los Angeles. As described above, it is anticipated that the PSH Ordinance could result in incremental growth of up to 2,000 PSH units (located in proximity to transit) over the course of ten years, in addition to 10,000 PSH units anticipated to result from Measure HHH and other previously approved gap-funding projects. By 2040 SCAG forecasts that, in the city of Los Angeles, there will be an additional approximately 237,000 households (compared to 2016) as well as other types of development. In addition SCAG forecasts that the City will add 665,400 people over the same time period. Construction of PSH units represent a small fraction of anticipated growth in the City of Los Angeles between 2016 and 2040 (about 5 percent); the potential increment of additional PSH housing that could be attributable to

the PSH Ordinance would be even smaller (0.8 percent). The 2016 RTP/SCS PEIR identifies the anticipated impacts of cumulative development through 2040 throughout the region. While overall cumulative development in the City could result in significant impacts in some issue areas, PSH development in general would not result in a cumulatively significant contribution to these impacts because:

- PSH development must comply with numerous applicable regulations in the City of Los Angeles (see identified Regulatory Compliance measures throughout this document)
- PSH development would be located in urban areas well-served by infrastructure
- PSH units are generally required to be energy efficient by funding sources
- PSH units have generally very low trip generation

In a separate effort, the City is pursuing the adoption of an Interim Motel Conversion Ordinance (IMCO) that would facilitate the temporary re-use of existing hotels and motels for the purposes of providing transitional and supportive housing. The IMCO is independent of the PSH Ordinance and is not dependent on the passage of the PSH Ordinance. Additionally, the PSH Ordinance is not dependent on the passage of the Interim Motel Conversion Ordinance. The City would pursue either of these ordinances independent of the other ordinance. Additionally, neither are the reasonably foreseeable outcome of the other ordinance as both have independent utility. The IMCO would facilitate interim use of guest rooms in existing hotels, motels, apartment hotels, transient occupancy residential structures and hostels as supportive housing and/or transitional housing. Unlike the PSH Ordinance, this ordinance is focused on interim or temporary use. While the Interim Motel Conversion Ordinance does allow for minor construction associated with the addition of cooking facilities, it does not allow for an increase in rooms/dwellings. The temporary conversion of hotel/motel use to supportive or transitional housing is not anticipated to result in significant adverse physical environmental impacts because it would involve little to no construction and would involve negligible to no expansion of an existing use – i.e., converting one type of residential use to another. The location and number of properties that would use this ordinance is unknown and would be speculative to identify; however, the number of properties which participate in the IMCO is likely to be a small percentage of the overall stock of hotels and motels in the City as this use is reliant on public funds to subsidize the cost of providing the associated supportive services and rental subsidies. The IMCO is not anticipated to result in a significant increase in trips (and associated impacts) at each hotel/motel conversion, because, similar to the target population of the PSH Ordinance, the target population of the IMCO is largely transit-dependent. Since the IMCO would not increase the number of units, the infrastructure serving the properties would already be present and sized for the facilities. The Proposed IMCO is not expected to result in substantial physical environmental impacts and therefore the

potential for overlapping or cumulative impacts with the Proposed PSH Ordinance is negligible.

As evaluated throughout this document, the Proposed PSH Ordinance allows for conversion of residential hotels to PSH (subject to the Hotel Unit Conversion and Demolition Ordinance LAMC Section 47.70 et seq.). Residential hotels represent an existing residential use that generally provides housing for low income and elderly and disabled persons. The Proposed PSH Ordinance includes provisions to allow the conversion or replacement of Residential Hotels to PSH, regardless of the underlying zoning.

Based on the proceeding discussions, no significant impacts were identified for the 18 environmental factors analyzed above. The PSH Ordinance would not result in impacts that are cumulatively considerable. No impact would occur and no further analysis is required.

c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact.

As identified throughout the analysis, the Proposed Ordinance would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant.

V. PREPARERS OF THE INITIAL STUDY

Lead Agency

City of Los Angeles
Department of City Planning
Policy Division
200 North Spring Street, Suite 278
Los Angeles, CA 90012

Environmental Consultant

Impact Sciences, Inc.
28 N. Marengo Avenue
Pasadena, CA 91101
(626) 564-1500

Jessica Kirchner Flores, AICP, Principal
Rima Ghannam, Associate Principal
Lynn Kaufman, Associate Principal
Brandon Whalen, Staff Planner
Jared Jerome, Technical Specialist
Van Hoang, Publications Coordinator

Sirius Environmental

Wendy Lockwood, Principal

VI. ACRONYMS

Acre-Feet Per Year	AFY
Air Quality Management Plan	AQMP
Asbestos Containing Material	ACM
Assembly Bill 32	AB 32
Best Management Practices	BMP
California Air Pollution Control Officers Association	CAPCOA
California Air Resources Board	CARB
California Ambient Air Quality Standards	CAAQS
California Building Code	CBC
California Code of Regulations	CCR
California Department of Transportation	Caltrans
Carbon Dioxide	CO_2
California Environmental Quality Act	CEQA
California Geological Survey	CGS
California Integrated Waste Management Act	AB 939
California Water Code	CWC
Carbon Monoxide	CO
Climate Action Plan	CAP
Coarse Inhalable Particular Material	PM10
Congestion Management Program	CMP
Department of Building and Safety	DBS
Department of Toxic Substances Control	DTSC
Emergency Operation Center	EOC
Equivalent Mass of CO_2	CO_2e
Federal Emergency Management Agency	FEMA
Federal Highway Administration	FHWA
Federal Transit Administration	FTA
Fine Inhalable Particular Material	PM2.5
Flood Insurance Rate Maps	FIRM
Floor Area Ratio	FAR
Greenhouse Gas	GHG
Heating Ventilating and Air Conditioning	HVAC
High Quality Transit Area	HQTA
Hydrofluorocarbon	HFC
Initial Study	IS
Lead	Pb
Lead Based Paint	LBP
Los Angeles Department of Water and Power	LADWP
Los Angeles Fire Department	LAFD
Los Angeles International Airport	LAX

Los Angeles Municipal Code	LAMC
Los Angeles Police Department	LAPD
Los Angeles Public Library	LAPL
Los Angeles Unified School District	LAUSD
Low Impact Development	LID
Methane	CH_4
Metropolitan Water District	MWD
Migratory Bird Treaty Act	MBTA
Most Likely Descendant	MLD
National Ambient Air Quality Standards	NAAQS
National Pollution Discharge Elimination System	NPDES
Native American Heritage Commission	NAHC
Negative Declaration	ND
Nitrogen Dioxide	NO2
Nitrogen Oxide	NO_x
Nitrous Oxide	N_2O
Office of Historic Resources	OHR
Office of Planning and Research	OPR
Ozone	O_3
Peak Particle Velocity	PPV
Perfluorocarbons	PFC
Permanent Supportive Housing	PSH
Regional Transportation Plan/Sustainable Communities Strategy	RTP/SCS
Regional Water Quality Control Board	RWQCB
San Fernando Basin	SFB
Senate Bill 375	SB 375
Special Flood hazard Areas	SFHA
Solid Waste Integrated Resource Plan	SWIRP
State Water Resources Control Board	SWRCB
Sulfur Hexafluoride	SF_6
Toxic Air Contaminants	TAC
Transit Priority Area	TPA
Tribal Cultural Resource	TCR
Traffic Impact Analysis	TIA
Urban Water Management Plan	UWMP
Uniform Building Code	UBC
Southern California Association of Governments	SCAG
South Coast Air Basin	(SoCAB)
South Coast Air Quality Management District	SCAQMD
Sulfur Dioxide	SO2
Volatile Organic Compounds	VOC
Watershed Protection Divisions	WPD