



Mello Act Ordinance Project

Case Number: ENV-2019-7394-ND

Project Location: The Project Area consists of the Coastal Zone which includes portions of Pacific Palisades, Venice, Del Rey, Playa Del Rey, San Pedro and Wilmington in the City of Los Angeles.

Community Plan Area: Brentwood-Pacific Palisades; Venice; Palms-Mar Vista-Del Rey; Westchester - Playa Del Rey; San Pedro; Wilmington-Harbor City

Council District: 11 - Bonin, 15 - Buscaino

Project Description: The Mello Act Ordinance (“Project”) is an ordinance to implement California Government Code Section 65590-65590.1, also known as the Mello Act adopted by the Legislature in 1982. The Mello Act seeks to preserve and expand the number of affordable dwelling units in the Coastal Zone areas of the State of California. The City has been complying with the Mello Act through the application of the Interim Administrative Procedures (IAP) adopted by the City Council (CF 98-0255) effective April 15, 2001. The Project will adopt permanent local regulations, process and project review requirements in the Los Angeles Municipal Code that will replace the existing Interim Administrative Procedures for projects that result in demolition, loss, or conversion of Residential Units and/or the development of new Residential Units in the Coastal Zone. The Project will also include the establishment of the Coastal Zone Affordable Housing Trust Fund for the purposes of collecting in lieu fees and expending funds to create additional affordable housing units in the Coastal Zone.

No land use changes are proposed as part of this Project. The main changes between the proposed Project and how the City has implemented Mello under the IAP are procedural and administrative in nature. More specifically the Project will:

- Be consistent with and implement the provisions of the Mello Act (Government Code Section 65590-65590.1).
- Ensure the preservation and maintenance of existing Residential Units, both affordable and market rate.
- Clarify the roles between the Housing and Community Investment Department (HCIDLA) and the Department of City Planning (DCP).
- Apply to any action for which a permit, authorization, or determination is required to be issued, resulting in the Conversion, Demolition, or reduction of the number of existing Residential Units; and/or the construction of new dwelling units.

- Apply to Change of Use from residential to a non-residential use and Condominium Conversion that converts one or more existing Residential Units to a condominium, cooperative, or similar form of owner.
- Apply to all Existing Affordable Residential Units that are rent restricted.
- Modify location allowance for Existing Affordable Residential Units replacement requirements.
- Create an in-lieu fee option for qualified affordable replacement units and fractional inclusionary units.
- Apply inclusionary requirements to developments of five or more units and require units to be built “on-site”.
- Introduce new and standardize methodology for financial feasibility studies.
- Incorporate regulations for Protected units and Right of First Refusal.
- Establish the Coastal Zone Affordable Housing Trust Fund.

The Project Area includes the Coastal Zone portions of the Brentwood-Pacific Palisades, Venice, Palms-Mar Vista-Del Rey, Westchester-Playa del Rey, San Pedro, and Wilmington-Harbor City Community Plan areas. These Coastal Zone areas are aggregated into the following subareas (see Figure 1): Subarea 1 Palisades (comprised of the Pacific Palisades Coastal Zone areas); Subarea 2 Venice (comprised of the Venice, Del Rey, and Playa del Rey Coastal Zone areas); Subarea 3 Harbor (comprised of the San Pedro Coastal Zone areas and the Wilmington Coastal Zone areas). The Project, in and of itself, does not propose or approve any development or any construction.

PREPARED BY:

The City of Los Angeles
Department of City Planning
Community Planning Bureau

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from construction and operation of the proposed **Mello Act Ordinance** Project (“Project”). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

The Los Angeles City Council instructed the Department of City Planning to prepare the Project. The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise, the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study, and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	MELLO ACT ORDINANCE
ENVIRONMENTAL CASE NO.	ENV-2019-7394-ND
RELATED CASES	CPC-2019-7393-CA

PROJECT LOCATION	COASTAL ZONE
COMMUNITY PLAN AREA	BRENTWOOD-PACIFIC PALISADES; VENICE; PALMS-MAR VISTA-DEL REY; WESTCHESTER - PLAYA DEL REY; SAN PEDRO, WILMINGTON-HARBOR CITY
GENERAL PLAN DESIGNATION	VARIOUS
ZONING	VARIOUS
COUNCIL DISTRICT	11 - BONIN, 15 - BUSCAINO

LEAD AGENCY	LOS ANGELES CITY PLANNING
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PROJECT DESCRIPTION

The Mello Act Ordinance (“Project”) is an ordinance to implement California Government Code Section 65590-65590.1, also known as the Mello Act adopted by the California State Legislature in 1982. The Mello Act seeks to preserve and expand the number of affordable dwelling units in the Coastal Zone areas of the State of California. The City has been complying with the Mello Act by implementing the Interim Administrative Procedures (IAP) adopted by the City Council (CF 98-0255). The Project consists of an ordinance with two actions:

- The Project will adopt permanent local regulations, process and project review requirements in the Los Angeles Municipal Code that will replace the existing Interim Administrative Procedures for projects that result in demolition, loss, or conversion of Residential Units and/or the development of new Residential Units in the Coastal Zone; and
- The Project will also establish the Coastal Zone Affordable Housing Trust Fund for the purposes of collecting in lieu fees and expending funds to create additional affordable housing units in the Coastal Zone.

No land use changes are proposed as part of this Project. The main changes between the proposed Project and how the City has implemented Mello under the IAP are procedural and administrative in nature. More specifically the Project will:

- Be consistent with and implement the provisions of the Mello Act (Government Code Section 65590-65590.1).
- Ensure the preservation and maintenance of existing Residential Units, both affordable and market rate.
- Clarify the roles between the Housing and Community Investment Department (HCIDLA) and the Department of City Planning (DCP).
- Apply to any action for which a permit, authorization, or determination is required to be issued, resulting in the Conversion, Demolition, or reduction of the number of existing Residential Units; and/or the construction of new dwelling units.
- Apply to Change of Use from residential to a non-residential use and Condominium Conversion that converts one or more existing Residential Units to a condominium, cooperative, or similar form of owner.
- Apply to all Existing Affordable Residential Units that are rent restricted.
- Modify location allowance for Existing Affordable Residential Units replacement requirements.
- Create an in-lieu fee option for qualified affordable replacement units and fractional inclusionary units.
- Apply inclusionary requirements to developments of five or more units and require units to be built “on-site”.
- Introduce new and standardize methodology for financial feasibility studies.
- Incorporate regulations for Protected units and Right of First Refusal.
- Establish the Coastal Zone Affordable Housing Trust Fund.

The Project includes the Coastal Zone portions of the Brentwood-Pacific Palisades, Venice, Palms-Mar Vista-Del Rey, Westchester-Playa del Rey, San Pedro, and Wilmington-Harbor City Community Plan areas (Project Area). These Coastal Zone areas are aggregated into the following subareas: Subarea 1 Palisades (comprised of the Pacific Palisades Coastal Zone areas); Subarea 2 Venice (comprised of the Venice, Del Rey, and Playa del Rey Coastal Zone areas); Subarea 3 Harbor (comprised of the San Pedro Coastal Zone areas and the Wilmington Coastal Zone areas). The Project, in and of itself, does not propose or approve any development or any construction.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

ENVIRONMENTAL SETTING

The total Project Area consists of the Coastal Zone and is approximately 26 square miles, or about six percent of the total land area of the City of Los Angeles. Coastal Zone areas are aggregated into the following subareas: Subarea 1 Palisades (comprised of the Pacific Palisades Coastal Zone area); Subarea 2 Venice (comprised of the Venice, Del Rey, and Playa del Rey Coastal Zone areas); Subarea 3 Harbor (comprised of the San Pedro Coastal Zone areas and Wilmington Coastal Zone areas). The three Subareas are each located along the Pacific Ocean coastline within the City of Los Angeles boundaries although not directly adjacent to one another. Hereafter, they are collectively referred to as the Project Area or distinctively referenced by Subarea.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

None

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.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions 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.

SUSAN WONG

PRINTED NAME

Susan Wong

SIGNATURE

CITY PLANNER

TITLE

01/25/2021

DATE

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 than 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 significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project consists of an ordinance with two actions, the first action adds a section to the Los Angeles Municipal Code to adopt permanent local regulations and procedures to conform with and implement the Mello Act (California Government Code Section 65590-65590.1). The purpose of the Mello Act is to preserve and expand affordable housing in the Coastal Zone. The Mello Act applies to demolition, conversion, change of use, subdivision, and new construction activities that involve existing or proposed dwelling units located in the Coastal Zone in the State of California. Since 2000, the City has been complying with the Mello Act by implementing the Interim Administrative Procedures (IAP). The intent of the Project is to adopt permanent procedures and regulations to implement the Mello Act in the Coastal Zone, adoption of the Project will replace the existing IAP. The Project also consists of a second action to establish the Coastal Zone Affordable Housing Trust Fund. Funds from any in lieu fees for qualified projects will be placed in the trust fund and expended for the purposes of developing and expanding affordable housing units in the Coastal Zone.

Consistent with the Mello Act, the Project will continue to ensure the preservation and maintenance of existing Residential Units, protect affordable units occupied ensuring the replacement of those units occur on a one-for-one basis, with a like-for-like affordability level, or lower and require new residential projects of a certain size to provide Inclusionary Residential Units.

The Project applies more restrictive requirements than the IAP with changes to process and regulations intended to ensure that the City continues to meet the intent of the Mello Act. The changes include but are not limited to applicability to types of units, inclusionary requirements and fractional unit provisions.

No land use changes are proposed as part of this Project. The main changes between the proposed Project and how the City has implemented Mello under the IAP are procedural and administrative in nature. More specifically the Project will:

- Be consistent with and implement the provisions of the Mello Act (Government Code Section 65590-65590.1).
- Ensure the preservation and maintenance of existing Residential Units, both affordable and market rate.

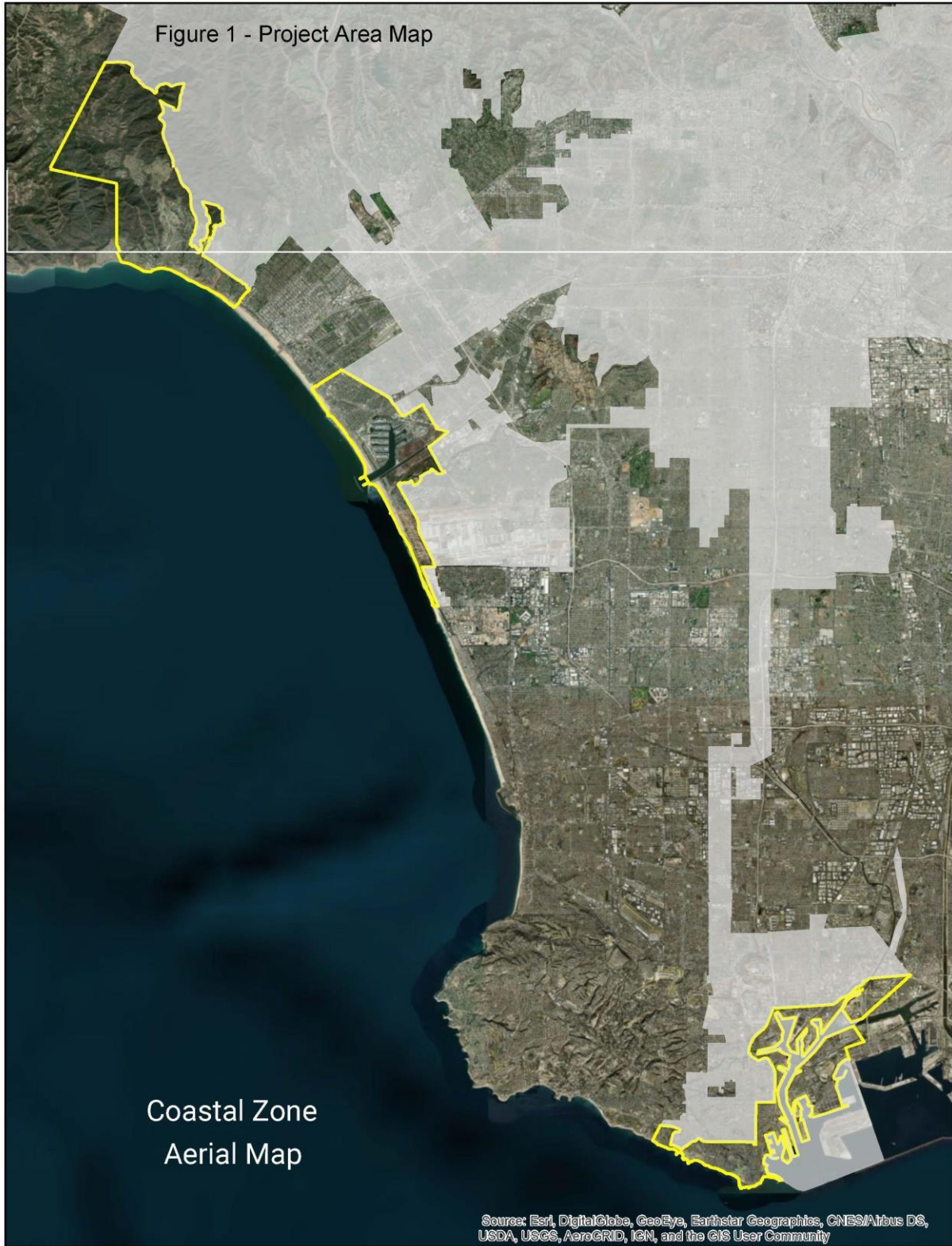
- Clarify the roles between the Housing and Community Investment Department (HCIDLA) and the Department of City Planning (DCP).
- Apply to any action for which a permit, authorization, or determination is required to be issued, resulting in the Conversion, Demolition, or reduction of the number of existing Residential Units; and/or the construction of new dwelling units.
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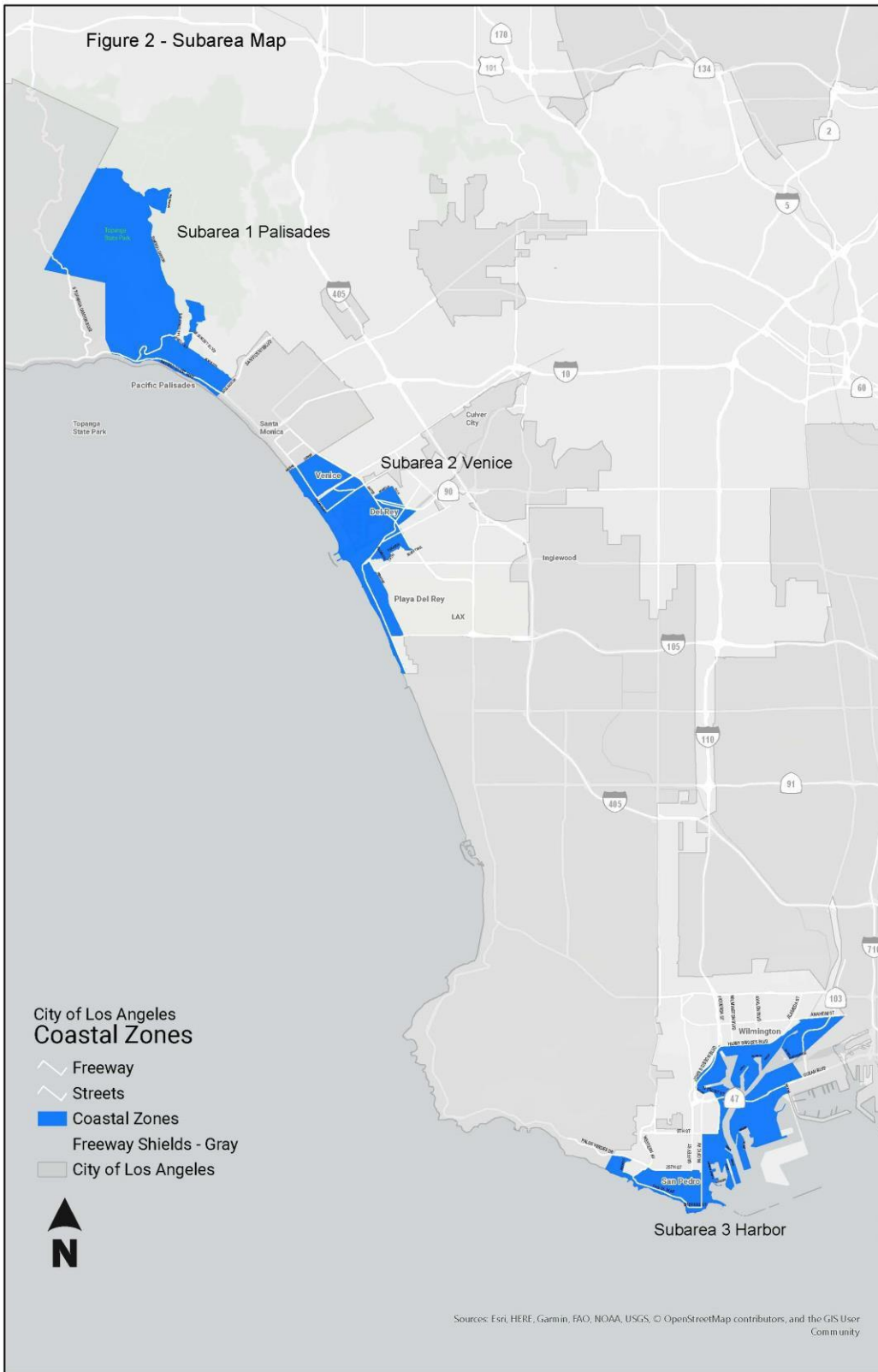
The proposed Project, by itself, does not propose or authorize new development or construction or ground disturbing activity. The proposed Project will provide more certainty and clarity for stakeholders and supports the intent of the Mello Act.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The total Project Area consists of approximately 26 square miles, or about six percent of the total land area of the City of Los Angeles. (See Figure 1 Map of Project Area) Coastal Zone areas are aggregated into the following subareas: Subarea 1 Palisades (comprised of the Pacific Palisades Coastal Zone areas); Subarea 2 Venice (comprised of the Venice, Del Rey, and Playa del Rey Coastal Zone areas) Subarea 3 Harbor (comprised of the San Pedro Coastal Zone area and the Wilmington Coastal Zone areas). (See Figure 2 - Subarea Map) The three Subareas are located along the Pacific Ocean coastline within the City of Los Angeles although not directly adjacent to one another.





For planning purposes, the City of Los Angeles (City) is divided into 35 Community Plan Areas (CPAs). These Community Plan Areas and their Plans make up the City’s General Plan Land Use Element. Each Coastal Zone community is located within one or more CPAs as shown in Table 1: Coastal Zone Community Plan Areas.

Table 1: Coastal Zone Community Plan Areas

Community	Subarea	Community Plan
Pacific Palisades	Subarea 1 Palisades	Brentwood-Pacific Palisades
Venice	Subarea 2 Venice	Venice
Del Rey	Subarea 2 Venice	Palms-Mar Vista-Del Rey
Playa del Rey	Subarea 2 Venice	Westchester-Playa del Rey
San Pedro	Subarea 3 Harbor	San Pedro
Wilmington	Subarea 3 Harbor	Wilmington- Harbor City

Subarea 1: Palisades (See Figure 3)

The Pacific Palisades Coastal Zone Community is the northernmost Community in the Project Area comprising approximately 7,685 acres, or about 46% of the total Project Area. It is generally bounded by Topanga State Park to the north, Adelaide Drive to the south, Almoloya, Las Lomas and Temescal Canyon to the east, and Pacific Coast Highway and Topanga to the west. The Palisades Subarea or Subarea 1 is a mix of developed and undeveloped lots. The developed areas consist of a mix of housing and a limited amount of commercial. The undeveloped areas consist mostly of hillsides and the Topanga State Park. The land use zoning is primarily made up of a mix of Open Space and various Residential lots. There are also lots zoned for Agricultural, Commercial, Public Facility and Parking uses in the Subarea 1.

Subarea 2: Venice (See Figure 4)

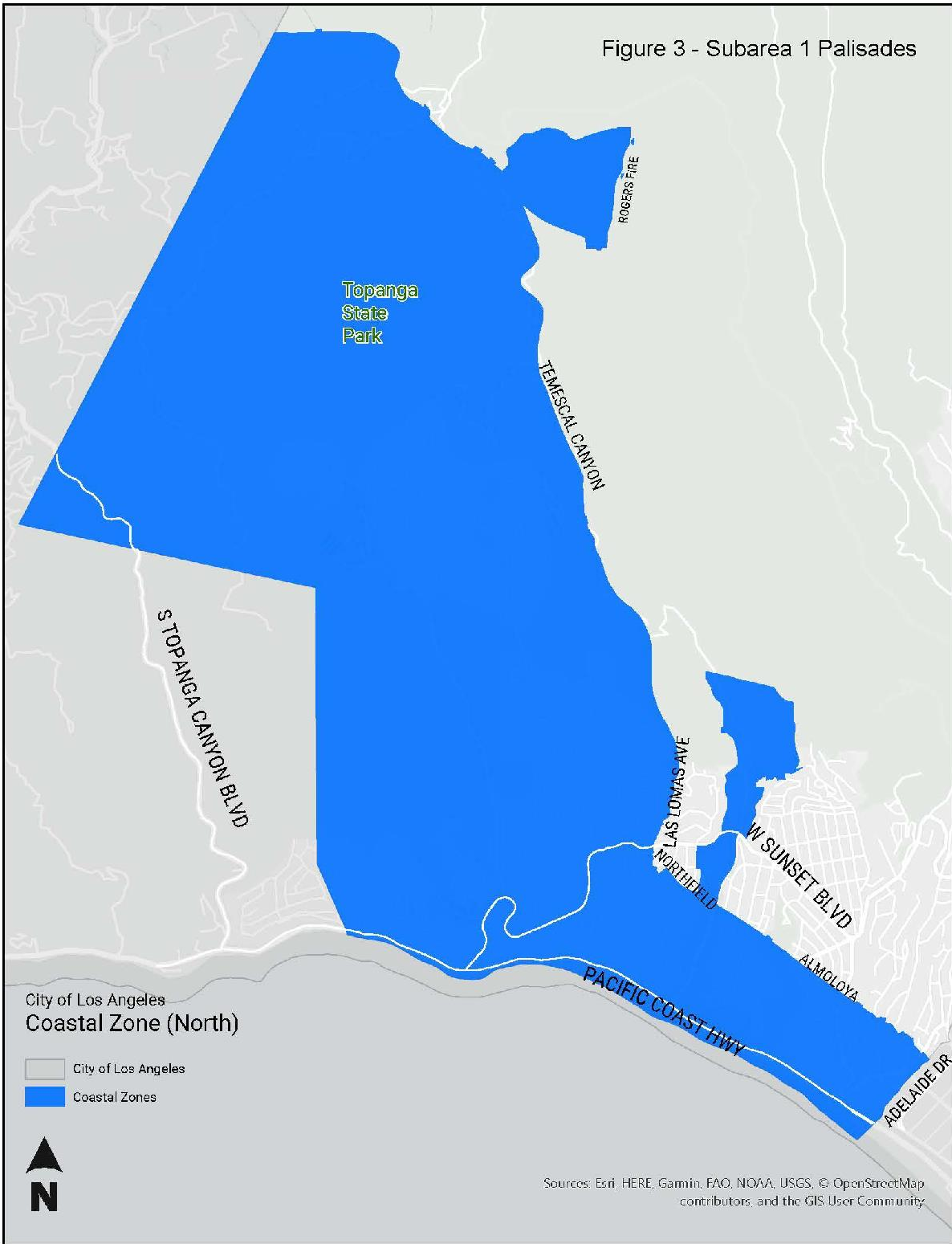
The Venice, Del Rey and Playa Del Rey Coastal Zone Area is located in the central portion of the Project Area comprising approximately 4,016 acres, or about 24% of the total Project Area. It is generally bounded by Marine and Dewey to the north, Veragua and 79th to the south, Pershing, Alla and Carter to the east, and the Pacific Ocean to the west. Subarea 2 is mostly built out with a mix of uses including Residential, Commercial, Manufacturing, Open Space uses which includes the beach front.

Subarea 3: Harbor (See Figure 5)

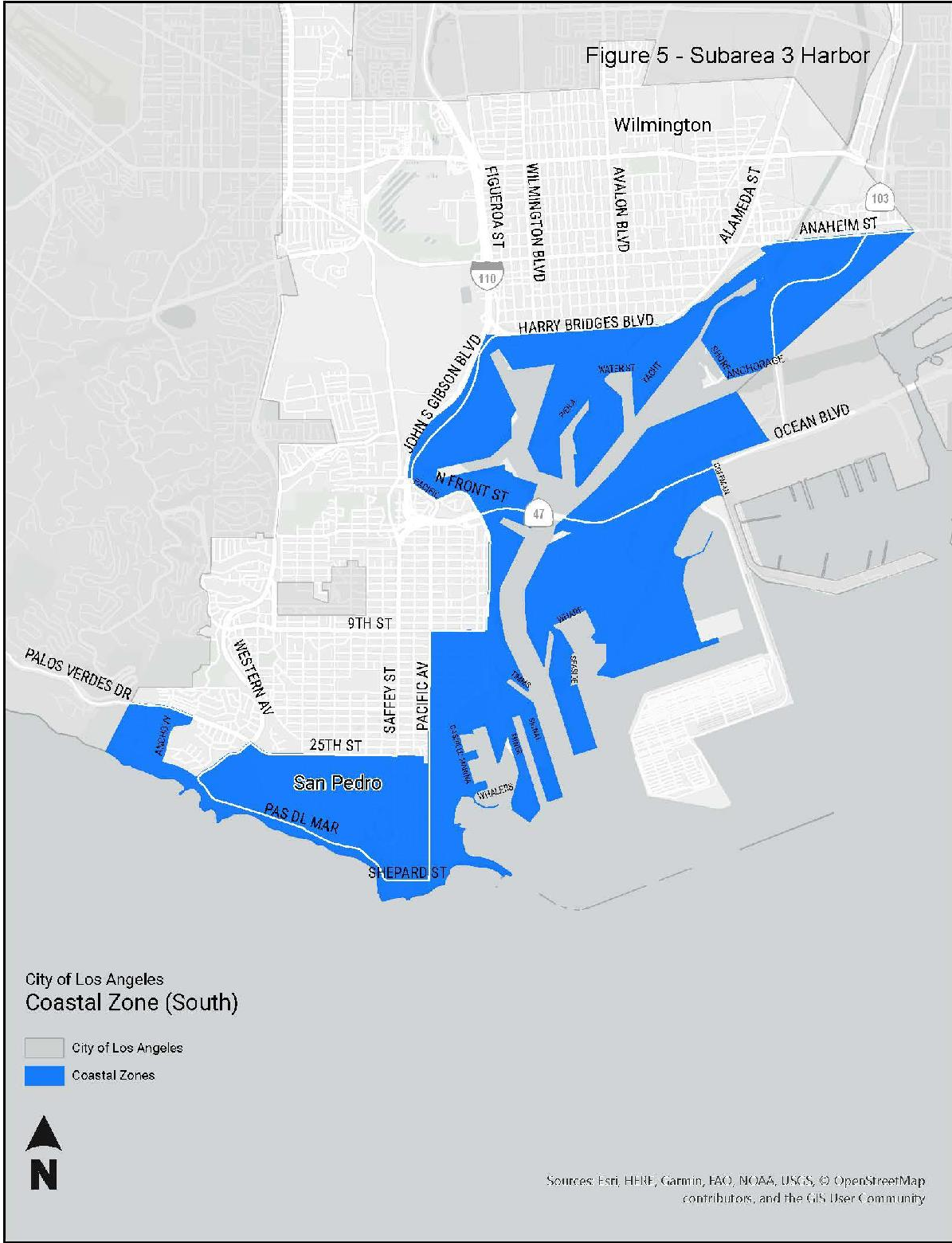
The San Pedro and Wilmington Coastal Zone Area is the southernmost part of the Project Area comprising approximately 4,959 acres, or about 30% of the total Project Area. It is generally bounded by Anaheim, Harry Bridges and 25th to the north, Paseo del Mar and Sheppard to the south, Cabrillo Marina and Coffman to the east, and Pacific and John Gibson to the west. Subarea 3 is made up largely

of Manufacturing uses including portions of the Port of Los Angeles and Port adjacent uses. Subarea 3 also contains various lots zoned for Residential uses, single-family and multi-family, Public Facility, Open Space, Agricultural and Commercial uses.

Figure 3 - Subarea 1 Palisades







3.2.2 Existing Conditions

The California State Mello Act was adopted in 1982 by the California State Legislature intended to protect and increase the supply of affordable housing in California's Coastal Zone. The law imposes two primary duties on local governments. First, a city or county may not approve a project that removes or converts existing housing units occupied by low or moderate-income households, unless provision is made for their one for-one replacement with new affordable units on site or within 3 miles of the Coastal Zone. Exceptions based on feasibility are provided. Second, a city or county may not approve a new housing development unless it provides the affordable units it can feasibly accommodate. In the City of Los Angeles, the Mello Act applies to portions of the Pacific Palisades, Venice, Del Rey, Playa Del Rey, San Pedro and Wilmington area.

In 2000, the City of Los Angeles approved a settlement agreement which resolved a lawsuit filed against the City in 1993 (Venice Town Council vs. City of Los Angeles BC089678). The settlement agreement created a document called the "Interim Administrative Procedures," designed to give further specificity to an interim Mello Act policy. The Interim Administrative Procedures (IAP) is the City's current mechanism for implementing the state Mello Act. The IAP involves the City's Planning Department, Housing Department and Building and Safety Department and sets forth the City's process for initial screening, application processing and enforcement and monitoring. The IAP requires the review of discretionary and non-discretionary applications that involve residential units for compliance with the Mello Act and is the interim process for review of projects. Consistent with the Mello Act, the IAP also requires that developers of residential projects within the Coastal Zone of the City both replace existing affordable housing in addition to setting aside a specified percentage of the project units for lower income residents or buyers. Moreover, the IAP requires that such set-aside units be built on the same site as the project or off-site at another property in the Coastal Zone or within 3 miles of the Coastal Zone, upon the granting of a feasibility waiver by the appropriate Area Planning Commission.

The Coastal Zone contains a wide variety of residential, commercial and industrial uses which is mostly built out but also includes large portions of undeveloped land including beaches, wetlands and hillside areas. The Project Area is within a mostly urban environment except in portions of Subarea 1 and 2 with a majority of the lots zoned for single family residential (35.40%), industrial (26.04%), and open space (25.94%), uses per the LAMC. There are also several other types of land uses permitted within the Project Area including multi-family residential (8.06%), public facilities (1.49%), parking (0.06%), commercial (1.48%) and agricultural (1.52%).

The following Table 2: Zoning in the Project Area by Subarea, includes a breakdown of the different generalized zoning categories (per the LAMC).

Table 2: Zoning in Project Area by Subarea

Subarea	Zoning	Percentage
1- Palisades	Agriculture	4.22%
	Commercial	0.3%
	Single-Family Residential	22.64%
	Multi-Family Residential	2.03%
	Public Facility	0.58%
	Open Space	70.21%
	Parking	0.02%
	Total	100%
2 - Venice	Agriculture	1.03%
	Commercial	9.27%
	Industrial	5.79%
	Single-Family Residential	6.86%
	Multi-Family Residential	44.67%
	Open Space	30.05%
	Public Facility	1.91%
	Parking	0.43%
Total	100%	
3- Harbor	Agriculture	0.48%
	Commercial	0.38%
	Industrial	82.04%
	Single-Family Residential	5.26%
	Multi-Family Residential	4.27%
	Open Space	4.12%
	Public Facility	3.44%
	Total	100%

According to building permit data provided by the Los Angeles Department of Building and Safety, from 2009 - 2019, there have been approximately 13,800 building permits issued in the Coastal Zone. The total square footage of new construction projects, demolitions, and additions from 2009-2019 in the Project Area is displayed by square footage in the following Tale 3: Permits Issued in Coastal Zone by Permit Type (2009-2019).

Table 3: Permits Issued in Coastal Zone by Permit Type (2009-2019)

	Demolitions (in square feet)	New Construction (in square feet)	Additions (in square feet)	Net New Construction and Additions (in square feet)
Project Area	-2,152,225 sf	43,185,792 sf	5,523,974 sf	48,709,766 sf

As shown in the table above, over the last ten years, there has been consistent development of new construction and additions in the Project Area. Approximately 75% of new construction projects are residential projects both single-family and multi-family. Approximately 29% are commercial developments and approximately 10% are industrial developments.

3.2.3 Surrounding Land Uses

The Project Area is divided into 3 non-contiguous subareas each within the Coastal Zone boundaries. In the northernmost subarea - Subarea 1 Palisades, the Project's surroundings consist mostly of open space and undeveloped lots to the north and west of the subarea. Lots southwest of Subarea 1 is developed with commercial and residential uses. To the west of Subarea 1 is the Pacific Ocean. The area surrounding Subarea 2 is set within an urbanized environment and consistent with the mix of uses within Subarea 2 which includes a mix of industrial, commercial and residential uses to the east and south of the subarea. To the north of Subarea 2 is the City of Santa Monica and to the west of Subarea 2 is the Pacific Ocean. Subarea 2 is also located adjacent to the Ballona Wetlands and does not include Marina del Rey which is surrounded by Subarea 2. Subarea 3 Harbor is the southernmost portion of the Project Area and is set within an urban environment. To the north and to the west of Subarea 3 are lots that are built out with a mix of uses including industrial, commercial, residential, open space and public facility uses. To the east and south of Subarea 3 are industrial uses and Port related uses in addition to the Pacific Ocean.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project consists of an ordinance with two actions; the first action adds a section to Los Angeles Municipal Code to adopt permanent local regulations and procedures to apply the Mello Act Government Code Section 65590-65590.1 to the Coastal Zone in the City of Los Angeles and the second action establishes the Coastal Zone Affordable Housing Trust Fund for the purpose of collecting in lieu fees from development projects associated with Mello. The Project does not propose or approve of any development project, any construction or any ground disturbing activities. The Project would only apply to existing and new residential in the Project Area that meets the regulation requirements for replacement units or new residential units. Based on the above, the Project will not have direct impacts on the physical environment. The Project will be analyzed for its reasonably foreseeable indirect impacts.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Initial Study /Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 12.32(C)(7), amend the LAMC to establish regulations and procedures to apply the Mello Act Govt Code Section 65590-65590.1 in the Coastal Zone in the City of Los Angeles and establish the Coastal Zone Affordable Housing Trust Fund.
- Pursuant to Section 556 and 558 of the Los Angeles City Charter to establish regulations and procedures to apply the Mello Act Govt Code Section 65590-65590.1 in the Coastal Zone in the City of Los Angeles and to establish the Coastal Zone Affordable Housing Trust Fund.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099 would the project:

- 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 within a state scenic highway?
- c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

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

Less-Than-Significant-Impact. A scenic vista is generally defined as a public view of highly valued visual and scenic resources exhibiting a unique or unusual feature, such as mountains, hillsides, bodies of water and/or urban skylines. A scenic vista may also be a particular distant view that provides visual relief from less attractive nearby features. Designated federal and state lands, as well as local open space or recreational areas, and may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape. Examples of local scenic views include public views of the Pacific Ocean, the Santa Monica Mountains, and the downtown Los Angeles skyline. A

significant impact would occur if a proposed project would have a substantial adverse effect on a scenic vista. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

Senate Bill (SB) 743 was signed into law by Governor Brown in September 2013, which made several changes to the CEQA for projects located in areas served by transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered to have a significant impact on the environment.

The Project Area is located within the designated California Coastal Zone thus lots in these subareas may have scenic vistas of the Pacific Ocean and hillside lots in Subarea 1 Palisades may also have scenic vistas of the Santa Monica Mountains, Hollywood Hills or the downtown Los Angeles skyline. According to Southern California's Association of Government's (SCAG) Transit Priority Areas (TPA)- 2045 Plan¹ only portions of Subarea 2: Venice is located in a TPA. Subarea 1 Palisades and Subarea 3 Harbor are not identified as areas in Transit Priority Areas. However, the Project is limited to an ordinance to adopt permanent local regulations and procedures to apply the Mello Act to the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The Project in and of itself does not propose or approve a development project and is not changing or expanding any land uses. The Project does not change zoning or General Plan designations, create any zoning entitlements, or introduce any new land uses that would result in an adverse effect on a scenic vista. Any future development projects that are proposed in conformance with the ordinance would be subject to further environmental analysis and it would be speculative to opine on where a project specific development would occur based on the purpose and scope of the Mello Ordinance. Furthermore, the Project will not result in changes to a structure's physical shape or size, nor will it create any physical changes to the environment. Therefore, there will be a less than significant impact related to scenic vistas.

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 state scenic highway?

No Impact. A significant impact would occur if a proposed project would substantially damage scenic resources within a State Scenic Highway. The California Department of Transportation manages the State Scenic Highway Program. According to the California State Scenic Highway System Map, a portion of the northern part of the Project Area contains a small segment of the officially designated State Route 27 (SR-27) Topanga Canyon State Scenic Highway and a portion of the eligible State Route Highway

¹ SCAG TPA - 2045 Plan, http://gisdata-scag.opendata.arcgis.com/datasets/c9249b6bba0f49829b67ce104f81ef20_1, accessed on August 11, 2020.

12. However, the proposed Project does not propose or approve any development project. The Project does not change zoning or General Plan designations, create any zoning entitlements, or introduce any new land uses that would result in an adverse effect on a state scenic highway. Moreover, the Project is limited to an ordinance to adopt procedures and regulations to comply with the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project will not result in changes to a structure's physical shape or size, nor will it create any physical changes to the environment. Any future development project within a state scenic highway would be subject to the City's Tree Ordinance and the Historic Cultural Monument (HCM) Ordinance as it relates to impacts on trees or historic buildings. Therefore, no impacts related to scenic highways would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. A significant impact would occur if a proposed project would substantially degrade the existing visual character or quality of the project site and its surroundings. Significant impacts to the visual character of a site and its surroundings are generally based on the removal of features with aesthetic value, the introduction of contrasting urban features into a local area, and the degree to which the elements of a proposed project detract from the visual character of an area.

The Project consists of an ordinance to adopt procedures and regulations to apply the Mello Act to preserve and increase affordable housing in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project itself does not incentivize or remove levels of individual project review for projects in the Coastal Zone. Moreover, the Project does not propose or approve a development or any construction activities. The Project does not change zoning or General Plan designations, create any zoning entitlements, or introduce any new land uses that would result in an adverse effect related to visual character. Future projects that occur, following the adoption of the ordinance would still be subject to the regulations consistent with and in some cases more restrictive than the existing Interim Administrative Procedures in place today. Therefore, the Project, by itself would not alter the visual character or quality of the Project Area and its surroundings, as such a less than significant impact would occur. No further analysis is required.

² California State Scenic Highway Map, <https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983>, accessed on August 11, 2020.

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

No Impact. A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and night-time 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 composed 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 Project is limited to an ordinance to adopt regulations and procedures to comply with the Mello Act which seeks to preserve and expand affordable housing in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project Area is mostly built out with a mix of uses and generally set within an urbanized environment with existing levels of ambient nighttime lighting, including streetlights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures that passes through windows) and automobile headlights except in Subarea 1 Palisades. These uses either are currently producing some light (as in the case of existing commercial, residential, mixed-use and industrial buildings) or would generally be located in areas that are developed and well-lit and zoned for development. Further, existing allowable uses would not be expected to emit large amounts of nighttime lighting or glare as all development projects are required to comply with provisions of the LAMC in this regard. The Project Area contains a number of lots that are undeveloped in Subarea 1 Palisades. However, the Project by itself does not propose or approve of any development and is not changing or expanding any land uses. Thus, the Project is not expected to create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. There would be no impacts and no further analysis is required.

II. AGRICULTURE AND FORESTRY 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 and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

No Impact. A significant impact would occur if a proposed project would convert valued farmland to non-agricultural uses. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland”. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Area has no Farmland³. The Project consists of an ordinance to adopt regulations and procedures to implement the Mello Act to preserve and expand affordable housing in the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The Project does not involve or include farmland or agricultural use. The Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new development that would convert any farmland to non-agricultural use. Therefore, the proposed Project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur.

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

No Impact. A significant impact would occur if a proposed project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The Project Area does not contain any use under a Williamson Contract. The Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new development that would conflict with or change existing zoning for agricultural use or a Williamson Act Contract. As such, the Project would not conflict with existing zoning

³ State of CA Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring, <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed on August 11, 2020

for agricultural use or conflict with a Williamson Contract. Therefore, no impacts would occur.

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))?

No Impact. A significant impact would occur if a proposed project conflicted with existing zoning or caused rezoning of forest land or timberland or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The Project Area is not zoned for forest land or timberland. Accordingly, the proposed Project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

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

No Impact. See response to Section II(c) above. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”⁴ The Project Area does not consist of any forest land or timberland. Thus, any development project following the adoption of the proposed Project would not result in the loss of or conversion of forest land. Therefore, there would be no impact and no further analysis is required.

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. See response to Section 2(a) through (d) above. A significant impact would occur if a proposed project caused the conversion of farmland to non-agricultural use. The Project Area does not contain Farmland identified by the State of CA Department of Conservation, Division of Land Resource Protection as Unique Farmland⁵. Moreover, the Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new development that would involve other changes in the existing environment which could result in the conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. Therefore, no impacts would occur.

⁴ California Public Resources Code Section 4526

⁵ State of CA Department of Conservation, Division of Land Resource Protection. CA Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency primarily responsible for comprehensive air pollution control in the SCAB and reducing emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2016 AQMP to meet federal and state ambient air quality standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG). A significant air quality impact may occur if a project is inconsistent with the AQMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The Project involves an ordinance to adopt regulations and procedures to apply the Mello Act to preserve and increase affordable housing in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. No development or ground disturbing

activity is proposed or approved as part of the Project. Additionally, the proposed Project does not change or expand any existing land uses. Since the Project does not propose or approve construction or development in the Project Area, it is not reasonably foreseeable that the Project will cause additional impact to air quality. As such, the Project is not expected to conflict with or obstruct the implementation of the AQMP and SCAQMD rules. Therefore, impacts would be less than significant, and no further analysis is required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

No Impact. A significant impact would occur if a proposed project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Project Area is located in an urbanized environment surrounded by existing public facilities, residential, industrial, and commercial buildings, traffic impacts that would have been included in the AQMP. It does, however, include a largely undeveloped area in Subarea 1 Palisades, that includes the hillside areas and the Topanga State Park. Nevertheless, the proposed Project does not propose or approve any development project, does not change zoning or General Plan designations, create any zoning entitlements, or introduce any new land uses. The Project consists of an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone in order to continue to preserve and expand affordable housing and to establish an affordable housing trust fund in the Coastal Zone. As such the Project is not anticipated to result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard. Therefore, the Project by itself would result in no impact and no further analysis is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities⁶.

As described above in section III (a) and (b), the Project does not propose or approve any development project or ground disturbing activity, nor does it change or expand any existing land uses. The Project does not incentivize or disincentivize construction of new residential, commercial, mixed use or industrial development, therefore, it is not reasonably foreseeable that the Project will expose sensitive receptors to substantial

⁶ South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issue in General Plans and Local Planning. <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf> accessed on September 8, 2020.

pollutant concentrations. Thus, the Project would result in a less than significant impact and no further analysis is required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. According to the SCAQMD, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding⁷ Odors from these types of uses would be localized and generally confined to the immediate area surrounding a project site. A proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Since no construction activity or development project is proposed or approved as part of this Project, it would not cause an odor nuisance. Furthermore, the Project does not change zoning or General Plan designations, create any zoning entitlements, or introduce any new land uses, and is not anticipated to result in new development that would result in other emissions, such as those leading to odors that could adversely affect a substantial number of people. The Project would not result in activities that create objectionable odors. Therefore, the Project would result in no impact and no further analysis is required.

⁷ South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf> accessed on September 8, 2020.

IV. BIOLOGICAL RESOURCES

<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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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 regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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 regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A project would have a significant biological impact through the loss or destruction of individuals of a species or through the degradation of sensitive habitat. Habitats are natural and/or artificial environments that support the survival of wild animals and native plants. Five habitat types have been identified by the City. These habitat types include Inland Habitats, Significant Ecological Areas (SEA), Wildlife Corridors, Ocean, and Coastal Wetlands.

The Project Area is primarily located in an urbanized setting located in the Coastal Zone with the exception of Subarea 1 which consists of undeveloped land including Topanga State Park. The Project Area or adjacent to the Project Area consists of Ocean habitat areas (San Pedro Bay and Santa Monica Bay), Coastal Wetlands (Palos Verdes Peninsula and Coastline and Ballona Wetlands) and Significant Ecological Areas (Terminal Island and Ballona Wetlands)⁸. It is important to note that sensitive habitat areas such as Topanga State Park and the Ballona Wetlands are largely zoned Open Space thus limiting potential development at these sites further protecting ecologically sensitive habitat, sensitive or special status species. The proposed Project does not propose to change any existing land uses or approve any new development in the habitat areas identified above or expand any new or existing allowable land uses. As such, the proposed Project would not directly or indirectly affect any special status species and would not modify any special status species habitat. The proposed Project would have no substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CA Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the proposed Project would result in less than significant impacts related to candidate, sensitive, or special status species. No further analysis is required.

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

No Impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. As previously mentioned above in section IV (a) areas where sensitive biological resources exist such as the Topanga State Park and the Ballona Wetlands are largely zoned Open Space thus limiting potential development at these sites and any potential adverse effects on riparian habitat or other sensitive natural communities in these areas. Moreover, the Project by itself, does not propose or approve any development and would not change or expand

⁸ LA County Sensitive Ecological Areas Program, <http://planning.lacounty.gov/site/sea/maps/>, accessed August 11, 2020

any new or existing land uses. The Project consists of an ordinance to adopt development regulations and procedures to apply the Mello Act which preserves and expands affordable housing in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. Development that occurs pursuant to the proposed Project would require its own individual environmental review. Thus, the Project would not result in direct impacts to biological resources, including riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service, within the Project Area or in the surrounding area, and no impacts would occur. No further analysis is required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. There are two categories of wetlands, coastal/tidal wetlands and inland/non-tidal wetlands. Inland/non-tidal wetlands are most common on floodplains along rivers and streams (riparian wetlands), in isolated depressions surrounded by dry land (for example playas, basins and “potholes”), along the margins of lakes and ponds, and in other low-lying areas where the groundwater intercepts the soil surface or where precipitation sufficiently saturates the soil (vernal pools and bogs)⁹. A significant impact would occur if federally protected wetlands would be modified or removed by a project.

The Project Area contains the Ballona Wetlands Ecological Reserve in Subarea 2, a federally protected wetlands as defined by Section 404 of the Clean Water Act¹⁰. The Project Area surrounding the Ballona Wetlands is located in an urbanized area and is mostly developed with existing public facilities, residential, office, commercial and industrial uses. However, the proposed Project does not approve or propose any development project, nor does it modify any City regulations that would adversely affect federally protected wetlands. Therefore, the proposed Project would not have any 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, and a less than significant impact would occur. No further analysis would be required.

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. Wildlife corridors are land segments that connect two or more large habitat areas and provide a habitat for movement of animals between those

⁹ United States Environmental Protection Agency, Wetlands - <https://www.epa.gov/wetlands/what-wetland>, accessed on August 11, 2020

¹⁰ U.S. Fish & Wildlife Service, National Wetlands Inventory, <https://www.fws.gov/wetlands/data/Mapper.html>, accessed on August 11, 2020

areas. A significant impact would occur if a proposed project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites.

According to the Los Angeles County Regional Planning Department, a wildlife corridor or regional wildlife linkage is located in Subarea 1 Palisades of the Project Area¹¹. Additionally, bodies of water in which fish are present are located in areas surrounding the Project Area (e.g., the Pacific Ocean). However, as previously mentioned, the Project is limited to an ordinance to adopt regulations and procedures to apply the Mello Act to the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The Project itself does not propose or approve a development project or any construction activity.

Additionally, nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code. Any future development project in the Project Area would be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA). The Migratory Bird Treaty Act of 1918 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. Compliance with the MBTA would ensure that no significant impacts to nesting birds or sensitive biological species or habitat would occur.

As the Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new development that would substantially interfere 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 nature wildlife nursery sites, there would be a less than significant impact.

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

Less Than Significant Impact. A significant impact would occur if a proposed project would be inconsistent with local regulations pertaining to biological resources. The Project would not conflict with any policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance. The City's Protected Tree Ordinance No. 177,404 (Chapter IV Article 6 of the Los Angeles Municipal Code), defines

¹¹ Los Angeles County Regional Planning. Regional Habitat Linkages and Wildlife Corridors. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-2_Regional_Wildlife_Linkages.pdf, accessed on August 30, 2020

protected trees as: Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree:

- Oak trees including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*);
- Southern California Black Walnut (*Juglans californica* var. *californica*);
- Western Sycamore (*Platanus racemosa*); and
- California Bay (*Umbellularia californica*):

The Project Area likely does contain locally protected biological resources, such as oak trees, Southern California black walnut, western sycamore, and California bay trees. However, the Project consists of an ordinance to adopt regulations and procedures to implement the Mello Act which preserves and increases affordable housing in the Coastal Zone and establish an affordable housing trust fund in the Coastal Zone. The Project by itself does not propose or approve a development project. Any future development project would be required to comply with the provisions of the Protected Tree Ordinance. Therefore, there would be no conflict with any local policies or ordinances protecting biological resources, and a less than significant impact would occur.

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. The Project Area does not fall within any identified Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, the Project would not conflict with the provisions of any adopted conservation plan, and no impacts would occur. No further analysis is required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines state that a “historical resource” is defined as: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record; in addition, (4) the fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register or historical resources, or identified in an historical resources survey does not preclude a lead agency from determining that the resource may be an historical resource.

Under the City’s Cultural Heritage Ordinance, local buildings and sites that meet the criteria for designation can be declared HCMs by the City Council after recommendation from the Cultural Heritage Commission. Within the Project Area, there are 64 declared City HCMs (see Table 4). The City also has a Historic Preservation Overlay Zone (HPOZ) Program (commonly known as historic districts) to provide for review of proposed exterior alterations and additions to historic properties within these designated historic districts. There are 35 adopted HPOZs in various neighborhoods citywide, there is one (1) HPOZ partially or wholly located within the Project Area, Vinegar Hill is located in San Pedro in Subarea 3 Harbor.

Table 4: Historic Cultural Monuments within the Project Area

Historic Cultural Monument	Coastal Zone Subarea	Site Address
Case Study House #8 - The Eames House and Studio and Grounds	Subarea 1 Palisades	203 Chautauqua Boulevard
Sycamore Trees	Subarea 1 Palisades	Bienveneda Avenue
Feuchtwanger House (Villa Aurora)	Subarea 1 Palisades	520 Paseo Miramar
Bradbury House	Subarea 1 Palisades	60-102 Ocean Way
Sten / Frenke-Gould Residence	Subarea 1 Palisades	126 Mabery Road
Barsha House	Subarea 1 Palisades	302 North Mesa Road
Site of Port of Los Angeles Long Wharf	Subarea 1 Palisades	Will Rogers State Beach Lifeguard Headquarters (15100 West Pacific Coast Highway)
Venice of America Home	Subarea 1 Palisades	1223 Cabrillo Avenue
Eames House	Subarea 1 Palisades	203 North Chautauqua Boulevard
Case Study House No. 9	Subarea 1 Palisades	205 Chatauqua Boulevard
Case Study House No. 18	Subarea 1 Palisades	199 Chatauqua Boulevard
Parry Residence	Subarea 1 Palisades	14924 West Camarosa Drive
Isherwood Bachardy Residence and Studio	Subarea 1 Palisades	145 Adelaide Drive
Monday Women's Club	Subarea 2 Venice	1206 South 6th Avenue
Morris Abrams Chateau des Roses	Subarea 2 Venice	515 E. Rose Avenue, 254 S Rennie Avenue
Venice Arcades (including Columns and Capitals)	Subarea 2 Venice	67-71 Windward Avenue
Venice Canal System	Subarea 2 Venice	Roughly bounded by Grand Canal, Carroll Canal, Eastern Canal, and Sherman Canal
Venice Division Police Station	Subarea 2 Venice	685 Venice Boulevard
"Binoculars "	Subarea 2 Venice	340 Main Street
Venice of America Home	Subarea 2 Venice	1223 Cabrillo Avenue
Venice City Hall	Subarea 2 Venice	681 East Venice Boulevard
Temple Mishkon Tephilo	Subarea 2 Venice	206 Main Street

Sturdevant Bungalow	Subarea 2 Venice	721 East Amoroso Place
Dickinson and Gillespie Building	Subarea 2 Venice	200 East Culver Boulevard
Venice West Café	Subarea 2 Venice	321 South Ocean Front Walk
Playa del Rey Pillars	Subarea 2 Venice	179 & 200 East Culver Boulevard
Irvin Tabor Family Residences	Subarea 2 Venice	605-607 East Westminister Avenue
The Potter	Subarea 2 Venice	1305 Ocean Front Walk
Winn Apartments	Subarea 2 Venice	417 South Ocean Front Walk
Municipal Warehouse No. 1	Subarea 2 Venice	2500 Signal Street
Bradbury House	Subarea 2 Venice	102 Ocean Way
The Ellison	Subarea 2 Venice	15 Paloma Avenue
Venice Canal Historic District	Subarea 2 Venice	Roughly bounded by Grand Canal, Carroll Canal, Eastern Canal, and Sherman Canal
Warren Wilson Beach House (Venice Beach House)	Subarea 2 Venice	15 30th Street
Venice Branch Library	Subarea 2 Venice	610 California Avenue
1110-1116 South Abbot Kinney Boulevard	Subarea 2 Venice	1110-1116 South Abbot Kinney Boulevard
Point Fermin Light Station	Subarea 3 Harbor	807 West Paseo Del Mar
San Pedro Municipal Ferry Building	Subarea 3 Harbor	Berth 84 (Foot of 6th Street)
S.S. Lane Victory	Subarea 3 Harbor	Berth 94
LAFD Fireboat 2 (Ralph J. Scott)	Subarea 3 Harbor	Berth 85
Fort MacArthur	Subarea 3 Harbor	2400 block of Pacific Avenue (Fort MacArthur)
US Post Office - San Pedro Main	Subarea 3 Harbor	839 South Beacon Street
American Trona Corporation Building	Subarea 3 Harbor	Pacific Avenue
John Barlow and Saxton Battery	Subarea 3 Harbor	Fort MacArthur
Battery Osgood - Farley	Subarea 3 Harbor	Fort MacArthur Upper Reservation
Point Fermin Lighthouse	Subarea 3 Harbor	805 Paseo Del Mar
Fort MacArthur, Upper Reservation	Subarea 3 Harbor	3601 South Gaffey Street
Liberty Hill Monument	Subarea 3 Harbor	North side of 5th Street between Palos Verde Street and Harbor Boulevard

Casa de San Pedro	Subarea 3 Harbor	2400 block of Pacific Avenue (Fort MacArthur)
Timms Point and Landing	Subarea 3 Harbor	Sampson Way and Timms Way at Southern Pacific Slip
Kinney-Tabor House	Subarea 3 Harbor	1310 South Sixth Avenue
The Danish Castle	Subarea 3 Harbor	324-324 1/2 West 10th Street
Redmen's Hall	Subarea 3 Harbor	543 Shepard Street
Cabrillo Beach Bathhouse	Subarea 3 Harbor	3720 Stephen White Drive
Wilbur F. Wood House	Subarea 3 Harbor	4020-4026 Bluff Place
Residence	Subarea 3 Harbor	381-383 West 10th Street
Harbor View House	Subarea 3 Harbor	907-945 Beacon Street and 912-928 Palos Verdes Street
USS Los Angeles Naval Monument (John S. Gibson Jr. Park)	Subarea 3 Harbor	Harbor Boulevard
Korean Bell and Belfry of Friendship (Angel's Gate Park)	Subarea 3 Harbor	Gaffey Street and 37th Street
Morgan House (Harbor Area YWCA)	Subarea 3 Harbor	437 West 9th Street
Site of Timm's Landing (landscaped park of Fishermens Co-op)	Subarea 3 Harbor	Fish Slip (San Pedro Harbor)
Fireboat No. 2 and Firehouse No. 112 (Berth 227)	Subarea 3 Harbor	Berth 85 and 227
Municipal Ferry Building (Maritime History Museum)	Subarea 3 Harbor	Berth 84 (Foot of 6th Street)
Saint Peter's Episcopal Church (24th and San Pedro)	Subarea 3 Harbor	2330-2338 Grand Avenue (Harbor View Memorial Park)

A significant impact would occur if a proposed project would substantially alter the environmental context of or remove identified historical resources. The proposed Project consists of an ordinance to adopt regulations and procedures to apply the Mello Act for projects that result in demolition, loss, or conversion of Residential Units and/or the development of new Residential Units in the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The Project, by itself, does not propose or approve any development. Future development activity within the Project Area that includes the issuance of a building, grading, demolition, sign, or change of use permit on sites with identified historic resources or on any sites with a resource not previously identified but with substantial evidence submitted to the City's Office of Historic Resources that a resource is a historical resource under the CEQA Guidelines would need to comply with any applicable ordinances and provisions of the LAMC and any applicable mitigation measures. In addition, future projects would be subject to all federal, state, and local regulations regarding the protection and preservation of historic resources. Therefore, the Project would result in a less than significant impact causing a substantial adverse change in the significance of a historical resource. No further analysis is required.

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

Less Than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of a proposed development. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources.

The Project consists of an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone and establish an affordable housing trust fund in the Coastal Zone. Any future development in the Project Area would continue to be subject to the numerous laws and regulations that require State and local agencies to consider the effects of a development project on potentially buried archaeological resources. 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.

The proposed Project, by itself, does not propose or approve any development project or ground disturbing activity. As such, there is less than significant potential for archeological resources to be affected by the proposed Project. Therefore, impacts to archeological resources would be less than significant. No further analysis is required.

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

Less Than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. Human remains could be encountered during excavation and grading activities associated with a proposed project. However, the Project does not propose or approve any development project. As such, no construction activities or ground disturbing activities are anticipated.

In the event that human remains are uncovered during ground-disturbing activities of future development projects, 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 addition, if human remains are encountered unexpectedly during construction demolition and/or grading activities for future developments in the Project Area, 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. If human remains of Native American origin are discovered during project construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resource Code Section 5097), relating to the disposition of Native American burials will be adhered to.

The Project is limited to an ordinance to adopt procedures and regulations to implement the Mello Act for projects that result in demolition, loss, or conversion of Residential Units and/or the development of new Residential Units in the Coastal Zone and establish an affordable housing trust fund in the Coastal Zone. Since the Project, by itself, does not involve any development as previously mentioned, no human remains would be disturbed as a result of the adoption of the Project. Therefore, a less than significant impact would occur, and no further analysis is required.

VI. ENERGY

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No Impact. The Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, and is not anticipated to result in new development that would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. As the Project does not consist of a development project, there is no construction activity and consequently no activity associated with the operation of a structure that would result in wasteful, inefficient or unnecessary consumption of energy resources. The Project will not change the existing building pattern. Future development that occurs subsequent to the adoption of the Project would remain subject to the Los Angeles Green Building Code (LAGBC - Ord. No. 181,479 and Ord. No. 181,480), which is based on the California Green Building Standards Code. The LAGBC serves as the mechanism to regulate and reduce a building's energy use, water use and overall carbon footprint. As the Project is not proposing any development, it is not reasonably foreseeable that there would be a significant direct or indirect effect to the environment due to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the Project would result in no impacts related to energy resources. No further analysis is needed.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. A significant impact would occur if a proposed project were to conflict or obstruct a state or local plan for renewable energy or energy efficiency. As mentioned in VI (a), any future development would be subject to the City's Green Building Code which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional and global

ecosystems. In addition, the California Energy Commission is the state's primary energy policy and energy planning agency responsible for assessing California's energy systems and trends as well as generating information resulting in renewable energy and energy efficiency promoting policies. There are several adopted State bills that promote renewable energy and energy efficiency for which future development projects will be required to comply including but not limited to: Senate Bill (SB) 350 Clean Energy and Pollution Reduction Act (2015), and Assembly Bill 2514 Energy Storage System Procurement Targets from Publicly Owned Utilities (2010). Some of these new policies inform and or expand the framework for local plans, programs and regulations regarding renewable energy and increased energy efficiency including, but not limited to: the City of Los Angeles' Green New Deal Plan, the Los Angeles Green Building Code; and the City's Existing Buildings Energy and Water Efficiency (EBEWE) Program. The proposed Project is limited to an ordinance to adopt regulations and procedures to comply with the Mello Act and apply those regulations to the Coastal Zone and establish an affordable housing trust fund in the Coastal Zone. No development project is proposed or approved as part of the Project. As such, the Project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no impacts would occur, no further analysis is required.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

i. Less Than Significant Impact. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zone, which are regulatory zones around active faults. These zones, which extend from 200 to 500 feet on each side of known active faults could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. A significant impact may occur if a project would cause personal injury or death or result in property damage as a result of a fault rupture occurring in the Project Area and is also located in a State-designated Alquist-Priolo fault zone or where appropriate building practices are not employed. The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy.

According to the California Department of Conservation Special Studies Zone Map, a portion of the Project Area is located in the Alquist Priolo Earthquake Fault Zone. The southern portion of Subarea 1 - Pacific Palisades falls along the Potrero Canyon Fault Zone¹². However, the proposed Project does not propose or approve a development project. Therefore, grading, excavation or other fault endangering activities associated with new development are not anticipated. The proposed Project would not expose people or structures to potential adverse effects resulting from the rupture of known earthquake faults. Thus, there would be a less than significant impact related to personal injury or death or resulting in property damage due to a fault rupture would occur. No other analysis is required.

ii. Less Than Significant Impact. A significant impact would occur if a proposed project would cause personal injury or death or result in property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Consequently, any development could expose people and structures to strong seismic ground shaking. The Project Area is located within seismically active Southern California and therefore, could be subject to moderate and possibly strong ground motion due to earthquakes on the Portrero Canyon Fault Line. However, the Project does not change zoning or General Plan designations, create

¹² California Department of Conservation, EQ Zapp: California Earthquake Hazards Zone Application, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed on August, 17, 2020

any zoning entitlements, approve any development projects, or introduce any new land uses that would result in strong seismic ground shaking or exacerbate existing environmental conditions so as to potentially cause strong seismic ground shaking.

In addition, all future development in the Project Area would be required to comply with all relevant California Building Code (CBC) and the City of Los Angeles Uniform Building Code (UBC) seismic standards, and if necessary the preparation of a site-specific geotechnical investigation that would evaluate the potential for seismic risk and identify appropriate mitigation measures. Implementation of the proposed Project does not trigger new development or construction and is not expected to induce development or otherwise alter existing development patterns. Grading, excavation, or other activities associated with increasing strong seismic ground shaking are not anticipated. Therefore, the proposed Project would result in less than significant impacts. No further analysis is required.

iii. Less Than Significant Impact. A significant impact may occur if a proposed project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. 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.

The California Department of Conservation's Seismic Hazard Zones Map identifies liquefaction zones in the Project Area. Liquefaction zones can be found in Subarea 1 Palisades - Topanga Liquefaction Zone, in Subarea 2 Venice - Venice Liquefaction Zone and Subarea 3 Harbor - San Pedro Liquefaction Zone¹³. The Project is limited to an ordinance to adopt regulations to implement the Mello Act in the Coastal Zone and establish an affordable housing trust fund in the Coastal Zone. The Project does not propose or approve any development project or ground disturbing activity. Current and future construction activities would continue to be required to comply with current seismic design provisions of the California Building Code and City's Building Code, which incorporates relevant provisions related to protection against liquefaction. Compliance with regulatory measures would reduce potential impacts. As such, the proposed Project would result in a less than significant impact related to seismic-related ground failure, including liquefaction and so no further analysis is required.

iv. Less Than Significant 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 shear strength, and increased water pressure. A significant impact would occur if a proposed project would be implemented on a site that would be located in a

¹³ California Department of Conservation, EQ Zapp: California Earthquake Hazards Zone Application <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed on August 17, 2020.

hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated that would suggest potential for sliding.

According to the California Department of Conservation, the Project Area contains identified landslide zones in each of the Subareas including the Topanga Landslide Zone in the Subarea 1 Palisades, Venice Landslide Zone in Subarea 2 Venice, and the San Pedro Landslide Zone in Subarea 3 Harbor¹⁴. The Project is limited to an ordinance to adopt regulations and procedures to comply with the Mello Act in the Coastal Zone and a secondly to establish an affordable housing trust fund in the Coastal Zone. The Project does not propose or approve any development project or any ground disturbing activity that would result in a landslide.

Future developments in the Project Area would be required to comply with all applicable regulations and standards of the LAMC, which sets specific building requirements beyond the CBC. In addition, if deemed necessary by the Department of Building and Safety, project applicants would be required to prepare a site-specific geotechnical investigation that would evaluate the potential for landslide risk and identify appropriate mitigation measures. Compliance with these regulatory measures would ensure that any development project would not create substantial geologic risk due to landslides. Therefore, the Project will have a less than significant impact as it relates to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No further analysis is required.

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

Less Than Significant Impact. A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. 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 including the coastline. 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 or where erosion control measures are not used.

The Project is limited to an ordinance to adopt regulations and procedures to implement the Mello Act in the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The Project does not propose or approve any development project. Construction of future development projects that would result in ground surface disturbance during site clearance, excavation, and grading and could create the potential for soil erosion would be required to perform in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. In addition, the proposed Project would be required to develop a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would require implementation of an erosion control plan to reduce the potential for wind or waterborne erosion during the construction process. All

¹⁴ California Department of Conservation, EQ Zapp: California Earthquake Hazards Zone Application <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed on August 17, 2020.

onsite grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, and conditions imposed by the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter. Furthermore, all development of new homes would be subject to all applicable Best Management Practices (BMPs) relating to erosion and stormwater runoff and included in the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899). Therefore, a less than significant impact would occur with respect to erosion or loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

No Impact. A significant impact would occur if a proposed project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. As previously mentioned, according to the California Department of Conservation, Division of Mines and Geology, the Seismic Hazard Zones Map shows the Project Area is located within landslide hazard zones and is susceptible to liquefaction. The proposed Project does not propose or approve development or any ground disturbing activity and does not authorize or expand any land uses. The Project is limited to an ordinance to adopt regulations and procedures to comply with the Mello Act in the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. Since the Project does not approve any construction or ground disturbing activity, the Project would not expose people or structures to soil that is unstable or that would become unstable and the potential effects resulting from landslides, lateral spreading, subsidence, liquefaction, or collapse and no impacts would occur.

d) Be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. A significant impact would occur if a proposed project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Expansive soils have relatively high clay minerals and expand with the addition of water and shrink when dried, which can cause damage to overlying structures.

Any future development in the Project Area would be required to comply with the requirements of the Uniform Building Code (UBC), LAMC, and other applicable building codes. Compliance with such requirements would reduce impacts related to expansive soils, thus impacts would be less than significant. However, since the proposed Project does not propose or approve any development project or any ground disturbing activity, the proposed Project would result in no impact.

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. A project would cause a significant impact if adequate wastewater disposal is not available. The Project Area is mostly located in a developed area which includes existing public infrastructure for wastewater disposal systems. The use of septic tanks or alternative wastewater disposal systems would not be required. The proposed Project does not propose or approve development and does not adopt or expand any allowable land uses. The proposed Project is limited to an ordinance to adopt procedures and regulations to comply with the Mello Act in the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. Therefore, the proposed Project would result in no impacts to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. No further analysis is required.

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

No Impact. 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. A significant impact may occur if a project destroys a unique paleontological resource site or unique geologic feature. The proposed Project is limited to an ordinance to adopt procedures and regulations to comply with the Mello Act in the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The Project does not involve any development project, construction or ground disturbing activity that would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. There, the proposed Project would result in no impact and no further analysis is required.

VIII. GREENHOUSE GAS EMISSIONS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant Impact. Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. GHG has been recognized to contribute 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.

The Project is an ordinance to adopt regulations and procedures to comply with the Mello Act in the city's Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The proposed Project by itself does not expand any land uses and does not alter the existing building pattern.

In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code (LAGBC) (Ordinance No. 181,480). The LAGBC requires projects to achieve a 20 percent reduction in potable water use and wastewater generation. The City has also adopted the LA Green New Deal Plan to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. Through required implementation of the LAGBC and the LA Green New Deal Plan, the proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs. Therefore, the proposed Project's generation of GHG emissions would not make a cumulatively considerable contribution to emissions and impacts would be less than significant.

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

Less Than Significant Impact. The California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the Southern California Association of Government (SCAG) region, the SCS is contained in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020-2045 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and commercial corridors, resulting in more opportunity for transit-oriented development. In addition, SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions that reduce vehicle miles traveled, which contribute to GHG emissions, as required by AB 32. As the proposed Project does not consist of a development project, there is no construction activity and consequently no activity associated with the operation of a structure. The proposed Project also is not expected to alter existing development patterns. The Project is the adoption of an ordinance to adopt permanent local regulations to comply with the Mello Act which is intended to preserve housing in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020-2045 RTP/SCS. The Project, therefore, would not conflict with statewide, regional and local goals and policies aimed at reducing GHG emissions and would result in a less than significant impact related to plans that target the reduction of GHG emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No Impact. A significant impact would occur if a proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Project would not specifically result in the transport, use, and disposal of construction related hazardous materials, as no specific development is proposed or approved. The Project consists of an ordinance to adopt regulations and procedures to comply with the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project does not consist of a development or any construction related activity. The Project does not propose or approve any activities that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. Any future development in the Project Area would be required to comply with all applicable local, state and federal regulations governing the routine transport, use or disposal of hazardous materials. With compliance to applicable standards and regulations and adherence to manufacturer’s instructions related to hazardous materials, the proposed Project would not create a significant hazard and would result in no impact.

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?

Less Than Significant Impacts. A significant impact would occur if a proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. However, the Project does not approve or propose any new development and is not expected to alter existing development or development patterns. No excavation or construction-related activities are anticipated to occur which could result in the release of hazardous materials into the environment. Therefore, the Project would not 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. Therefore, the Project would result in less than significant impacts related to upset and accident conditions. No further analysis is required.

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. Construction activities have the potential to result in the release, emission, handling, and disposal of hazardous materials within one-quarter mile of an existing school. There are 16 existing schools located within the Project Area (Table 5).

Table 5: Schools within the Project Area

School	Coastal Zone Subarea	Site Address
Marquez Charter School	Subarea 1 Palisades	16821 Marquez Ave

Palisades Charter High School	Subarea 1 Palisades	15777 Bowdoin St
Canyon Elementary School	Subarea 1 Palisades	421 Entrada Dr
Ánimo Venice Charter High School	Subarea 2 Venice	820 Broadway St
Broadway Elementary School	Subarea 2 Venice	1015 Lincoln Blvd
Broadway Elementary School Mandarin Language Immersion Program	Subarea 2 Venice	1015 Lincoln Blvd
Broadway Elementary School Spanish Language Immersion Program	Subarea 2 Venice	1015 Lincoln Blvd
Westminster Avenue Elementary School (Math & Technology/Environmental Studies Magnet)	Subarea 2 Venice	1010 Abbot Kinney Blvd
Westside Global Awareness Magnet	Subarea 2 Venice	104 Anchorage St
15th Street Elementary School	Subarea 3 Harbor	1527 S Mesa St
Alliance: Alice M. Baxter College-Ready High School	Subarea 3 Harbor	461 W 9th St
Angel's Gate Continuation High School	Subarea 3 Harbor	3607 S Gaffey St
Point Fermin Elementary School (Marine Sciences Magnet)	Subarea 3 Harbor	3333 Kerckhoff Ave
San Pedro Senior High (Marine Science, Math Science, & Technology Magnet)	Subarea 3 Harbor	1001 W 15th St
San Pedro Senior High (Police Academy Magnet)	Subarea 3 Harbor	1001 W 15th St
White Point Elementary School	Subarea 3 Harbor	1410 Silvius Ave

The Project does not approve or propose any new development. As discussed in Section IX (a) above, any future development project may include the use of those hazardous materials that are typically necessary for construction of new developments (e.g., paints, building materials, cleaners, fuel for construction equipment, etc.) where construction activities would involve routine transport, use and disposal of construction-related hazardous materials. Conformance with all applicable local, state and federal regulations governing such activities would result in a less than significant impact related to hazardous emissions, acutely hazardous materials, substances, or waste impacting schools. However, since there is no development project and no related construction activity the proposed Project would result in less than significant impacts related to schools. No further analysis 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?

No Impact. A significant impact would occur if the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC’s oversight.

A review of the EnviroStor website showed that there were 50 Cleanup Sites located in the Project Area, 4 in Subarea 1, 12 in Subarea 2 and 34 in Subarea 3.

Table 6: Clean Up Sites within the Project Area¹⁵

Location	Coastal Zone Subarea	Clean Up Type/ Status
Pacific Palisades Village 1045 Swarthmore Avenue	Subarea 1 Palisades	Voluntary Clean Up/Active
Former Mobil Gas Station 15281 Sunset Blvd.	Subarea 1 Palisades	Voluntary Clean Up/Active
Texas/Mobil Service Station 16605 Sunset Blvd.	Subarea 1 Palisades	Voluntary Clean Up/Active
Sunset Cleaners 16605 Sunset Blvd.	Subarea 1 Palisades	Voluntary Clean Up/Active
Edision/Venice MGP Parce A 340 Main Street & 321 Hampton Drive	Subarea 2 Venice	State Response/Certified
Pioneer French Bakery 354 Third Avenue	Subarea 2 Venice	Evaluation/Refer to Local Agency
Combined Properties Inc. 201 Lincoln Blvd.	Subarea 2 Venice	Voluntary Clean Up/Certified
Guaranteed Muffler 609 Lincoln Blvd.	Subarea 2 Venice	Evaluation/Refer to Local Agency
Animo Venice Charter High School 841 California Avenue	Subarea 2 Venice	School Investigation/No further action
El Segundo Batter Site	Subarea 2 Venice	Military Evaluation/Inactive
Playa del Rey FCS #1	Subarea 2 Venice	Military Evaluation/Inactive
Gus Storage Reservoir	Subarea 2 Venice	Military Evaluation/Inactive
Marina One Hour Cleaner 4019 Lincoln Blvd.	Subarea 2 Venice	Voluntary Clean Up/Refer RWQCB
Commercial Complex 3237 Carter Avenue	Subarea 2 Venice	Voluntary Clean Up/Refer to Local Agency
Jefferson at Marina del Rey 3217 -3221 & 3237 Carter	Subarea 2 Venice	Voluntary Clean Up/Certified O&M Land Use Restrictions

¹⁵ Department of Toxic Controlled Substances, Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60002866 accessed on September 1, 2020

Nike TY 70	Subarea 2 Venice	Military Evaluation/Inactive
Fort MacArthur Lower & Middle Res 2901 Arthur MacArthur	Subarea 3 Harbor	State Response/Inactive
LA District Office and Yard	Subarea 3 Harbor	Military Evaluation/Inactive
Pacific View Investments 1415-1460 West 25th Street	Subarea 3 Harbor	Evaluation/ Refer
Fort MacArthur Upper Reservation 28th Street Gaffey Street and 31st Street	Subarea 3 Harbor	Military Evaluation/No Further Action
South Region High School #15 3200 South Alameda	Subarea 3 Harbor	School Clean Up/ Certified O&M Land Use Restriction
Los Angeles Air Force Base (Fort MCA) MacArthur Douglas Street	Subarea 3 Harbor	Military Evaluation/Refer
Fort MacArthur Lower Reservoir	Subarea 3 Harbor	Military Evaluation/Inactive
Naval Dir Finder	Subarea 3 Harbor	Military Evaluation/Inactive
Naval Landing	Subarea 3 Harbor	Military Evaluation/Inactive
San Pedro Boat Works Port of Los Angeles BERTHS 44-45	Subarea 3 Harbor	State Response/Active
GATX Annex Terminal 208 East 22nd Street	Subarea 3 Harbor	State Response/Certified O&M Land Use Restrictions
Western Pipe & Steel	Subarea 3 Harbor	Military Evaluation/Inactive
Wilmington Supply CSC	Subarea 3 Harbor	Military Evaluation/ Inactive
AMTB Batteries	Subarea 3 Harbor	Military Evaluation/Inactive
Res NT La Harbor	Subarea 3 Harbor	Military Evaluation/Inactive
Bethlehem Ship Building Corp	Subarea 3 Harbor	Military Evaluation/Inactive
Southwest Marine Terminal Island Facility - 985 Seaside	Subarea 3 Harbor	State Response/Active
Camp Ross	Subarea 3 Harbor	Military Evaluation/Inactive
Catalina Terminal	Subarea 3 Harbor	Military Evaluation/Inactive
DW Russell Co. 412 Harry Bridges	Subarea 3 Harbor	Evaluation/Refer to Local Agency
California Yacht Club	Subarea 3 Harbor	Military Evaluation/Inactive
Gibson Environmental 401 Canal Street	Subarea 3 Harbor	Hazardous Waste/Undergoing Closure
Koppers Los Angeles 210 South Avalon	Subarea 3 Harbor	Voluntary Clean Up/No Further Action
Roehl Disposal Services 131 N. Marine	Subarea 3 Harbor	Hazardous Waste/Closed
Avalon Triangle 101 N. Broad Street	Subarea 3 Harbor	Voluntary Clean Up/Active
CALTRANS Terminal Island 420 Henry Ford	Subarea 3 Harbor	State Response/No Further Action

Wilmington Disposal Center	Subarea 3 Harbor	Military Evaluation/Inactive
Hugo Neu Proler Company 901 New Dock Avenue	Subarea 3 Harbor	Corrective Action/Active
Port of Long Beach Parcel 1 New Dock Street and Henry Ford	Subarea 3 Harbor	Evaluation/Inactive
Roosevelt Naval Base	Subarea 3 Harbor	Military Evaluation/Inactive
Long Beach Naval Complex Off Ocean Blvd and Navel Way	Subarea 3 Harbor	State Response/Active Land Use Restrictions
EPTC Long Beach	Subarea 3 Harbor	Hazardous Waste/Closed with Land Use Restrictions
Long Beach Generation Station 2685 Seaside Blvd.	Subarea 3 Harbor	Corrective Action/Active
Pier S Area 4 Port of Long Beach	Subarea 3 Harbor	Voluntary Clean Up/Inactive

The Project would not produce any impact causing a significant hazards risk to the public. The Project does not propose or approve development or ground disturbing activity and would not authorize or expand any new or allowable land uses.

Although the proposed Project contains Clean Up sites it would not create a significant hazard to the public or the environment since no development or ground disturbing activity is associated with the Project thus no impact would occur. Any future development that occurs in the Project Area would be required to comply with existing regulations related to hazardous materials. Therefore, with no proposed or approved development project and compliance of state and local laws and regulations for future projects, the Project by itself would result in no impacts related to hazardous materials sites. No further analysis is 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 result in a safety hazard or excessive noise for people residing or working in the project area?

Less Than Significant Impact. The Project Site is located within one mile of the Los Angeles International Airport (LAX) and the Santa Monica Municipal Airport. The Project consists of an ordinance to adopt regulations and procedures to comply with and apply the Mello Act in the Coastal Zone and to establish an affordable housing trust fund in the Coastal Zone. The proposed Project does not change zoning or General Plan designations, create any zoning entitlements, approve any development projects, or introduce any new land uses, or foreseeably result in new development that would result in a safety hazard or excessive noise for people in the Project Area. Therefore, it is not anticipated that the proposed Project would result in a safety hazard for people residing or working in the Project Area who are within an airport land use plan, where such a plan has been adopted or are within two miles of a public airport, and a less than significant impact would occur.

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

No 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 (EOC). The EOC is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the U.S. Department of Interior 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, General Plan Safety Element identifies the following streets as designated disaster routes serving the Project Area: Subarea 1 Palisades - Sunset Blvd, Subarea 2 Venice - Venice Blvd., Lincoln Blvd., Sepulveda and Manchester, Subarea 3 Harbor - Pacific, Western, 25th, Alameda, 9th, Paseo del Mar, Harbor and Figueroa¹⁶ The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Area or surrounding area. The Project itself does not propose or approve any development project, expand any land uses or alter any development patterns. Emergency access to and from the Project Area would be provided in accordance with requirements of the Los Angeles Fire Department (LAFD). Therefore, it is not anticipated that the Project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The Project Area is located within an urbanized area with a mix of uses including single-family, multi-family residential, commercial, open space and manufacturing uses. The Selected Wildfire Hazard Areas are located mostly in the hilly areas of the City. Within the Project Area, Exhibit D Selected Wildfire Hazard Areas Map of the General Plan Safety Element identifies parts of Subarea 1 Palisades containing areas with Mountain Fire Districts or Fire Buffer Zones¹⁷. However, as previously stated, the Project does not propose or approve any development or expand any allowable land uses. The Project consists of an ordinance to adopt regulations and procedures to comply with the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. Thus, the Project is not anticipated to increase risk or expose people or structures to a significant risk of loss, injury or death involving

¹⁶ City of Los Angeles, General Plan Safety Element, Exhibit H Critical Facilities and Lifeline Systems. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed on September 1, 2020

¹⁷ City of Los Angeles, General Plan, Safety Element Exhibit D WildFire Hazard Areas. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed on September 1, 2020

wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Prior to the issuance of any building permits for any future development pursuant to the Project, developments would be reviewed by the Los Angeles Fire Department to ensure any new development is designed and constructed to conform with all applicable Los Angeles Fire Code regulations protecting it from wildfires. This would include the addition of automatic sprinklers, smoke detectors and a fire alarm system for new development projects located in high fire severity zones. Therefore, the Project would result in less than significant impacts related to wildland fires. No further analysis is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. 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; or				
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A significant impact would occur if a development discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) or the State Water Resources Control Board (SWRCB). The LARWQCB issued Waste Discharge Requirements for Municipal Stormwater and Urban Runoff Discharges (NPDES Permit No. CAS004001), which requires new development and redevelopment projects to incorporate stormwater mitigation measures. Depending on the type of project, either a SUSMP or a Site-Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves a project site.

The Project does not propose or approve a development or expand any land uses and does not produce any point source discharge (discharge of polluted water from a single point such as sewage outflow pipe). Stormwater runoff from any future development has the potential to introduce small amounts of pollutants such as pesticides, fertilizers and ordinary household cleaners into the stormwater system. Future developments would be required to comply with the National Pollutant Discharge Elimination System standards and the City's Stormwater Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No.173,494) to ensure pollutant loads from the project site are minimized for downstream receiving waters. Developments would be required during construction activities and operation of projects to integrate low impact development practices and standards for stormwater pollution mitigation, and maximize open, green and previous space on all projects consistent with the City's landscape ordinance and other related requirements in the City's Development Best Management Practices (BMPs) Handbook. In addition, projects, would also be required to comply with the City of Los Angeles Low Impact Development (LID) (Ordinance No. 181,899) which is a stormwater management strategy and requirements of the City's Standard Urban Stormwater Mitigation Plan (SUSMP) to address stormwater pollution from new development projects. Conformance with these regulations would be required during the City's building plan review and approval process and ensure a less than significant impact to violations of any water quality standards, waste discharge requirements or degradation of surface or ground water quality. As such, the Project would result in a less than significant impact related to water quality and water discharge. No further analysis is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. A significant impact would occur if a proposed project would substantially deplete groundwater or interfere with groundwater recharge. Potable water would be supplied by the Los Angeles Department of Water and Power (LADWP), which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. The proposed Project consists of an

ordinance to adopt regulations and procedures to comply with the Mello Act in the Coastal Zone and adopt the Coastal Zone Affordable Housing Trust Fund. The Project does not propose or approve any development project, expand any land uses or change any development patterns. Therefore, it is anticipated that the Project would not require direct additions or withdrawals of groundwater. There would be no impact on groundwater supplies or groundwater recharge, no further analysis is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on- or off-site;**
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
- iii. 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; or**
- iv. Impede or redirect flood flows?**

Less Than Significant Impact. A significant impact would occur if a proposed project would substantially alter the drainage pattern of an existing stream or river so that erosion or siltation would result. In general, the Project Area is mostly built out with single-family, multi-family, commercial and industrial uses with the exception of Subarea 1, where there are large areas of undeveloped parcels. There are natural waterways and streams located throughout the Project Area in each Subarea¹⁸.

The proposed Project does not propose or approve development, nor does it intensify or change any land uses. Significant alterations to existing drainage patterns within the Project Area and surrounding area would not occur as a result of the Project. As discussed in Section X(a) above, development that occurs in the Project Area would be required to comply with all federal, state and local regulations regarding stormwater runoff, including the City's LID Ordinance and the City's UWWMP Best Management Practices (BMPs). Compliance with these regulatory measures would reduce the amount of surface water runoff in the Project Area after a storm event. In addition, compliance with construction related BMPs and/or the Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation on or off-site. Moreover, the Project does not construct any structures that would impede flood flows within a 100 year or 500-year flood plain. Therefore, it is not anticipated that the proposed Project would result in impacts related to stormwater drainage patterns that would cause flooding, contribute to excess polluted runoff, on- or off-site erosion or siltation impeding or redirecting of flood flows, as such, there would be a less than significant impact. No further analysis is needed.

¹⁸ City of Los Angeles, Navigate LA. <https://navigatea.lacity.org/navigatea/>, accessed on August 19, 2020.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. A significant impact would occur if a proposed project would be located within an area susceptible to inundation by seiche, tsunami, or inundation. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. The Project Area is not located in an area where it would be susceptible to a seiche. A tsunami is a great sea wave produced by a significant undersea disturbance. The Project Area is in the Coastal Zone which is located adjacent to the Pacific Ocean and could be susceptible to a tsunami or possible inundation in the event of a natural disaster. According to the Safety Element of the City of Los Angeles General Plan, Exhibit F 100-Year & 500-Year Flood Plains Map, all three Subareas within the Project Area are located within a 100-year or 500-year flood plain. Additionally, the General Plan Safety Element, Exhibit G identifies portions of the Project Area as areas susceptible to inundation and tsunamis; Subarea 1 Palisades - inundation, Subarea 2 - Venice - inundation and tsunami and Subarea 3 San Pedro Harbor - tsunami¹⁹. However, the Project does not propose or approve a development project or ground disturbing activity. The Project is limited to an ordinance to adopt regulations and procedures to comply with the Mello Act in the Coastal Zone and to establish a Coastal Zone Affordable Housing Trust Fund. Therefore, it is not anticipated that the Project by itself would release pollutants due to project inundation in flood hazard, tsunami or seiche zones, and a less than significant impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. A significant water quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans. The Project does not propose or approve any development and is not intensifying any existing allowable land uses, thus, existing conditions are not expected to significantly change or cause a conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Any future development would continue to be subject to all applicable state or local water quality control plans or sustainable groundwater management plans. Therefore, the proposed Project would result in no impacts related to implementation of a water quality control plan or sustainable groundwater management plan. No further analysis is needed.

¹⁹ City of Los Angeles, General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed on August 19, 2020.

XI. LAND USE AND PLANNING

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a) Physically divide an established community?

No Impact. A significant impact would occur if a proposed project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The Project would not involve any street vacation or closures or result in development of new thoroughfares or highways which would divide established communities. The Project consists of an ordinance to adopt regulations and procedures to comply with the Mello Act in the Coastal Zone and to adopt an affordable housing trust fund in the Coastal Zone. The Project does not propose or approve any development project or expand or intensify any land uses. Therefore, no impact would occur as it relates to the physical division of an established community. No further analysis is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site, and would cause adverse environmental effects, which the General Plan and zoning are designed to avoid or mitigate.

In the City of Los Angeles, the General Plan Framework Element serves as the City's strategy for long-term growth and sets the citywide context to help guide the update of the Community Plans (Land Use Element) and citywide elements (e.g., Housing Element, Conservation Element, Air Quality Element, Safety Element, etc.). The City's Land Use Element consists of the 35 Community Plans, which include goals and land use policies to guide the physical development of specific areas throughout the City.

The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy or regulation. The Project Area consists of the City's Coastal Zone which is located in portions of the Venice Community Plan, Brentwood-Palisades Community Plan, Mar Vista Del Rey Community Plan, San Pedro Community Plan and Wilmington Community Plan. As previously mentioned, the Project consists of an ordinance to adopt regulations and procedures to comply with the Mello Act in the Coastal Zone and adopt the Coastal Zone Affordable Housing Trust Fund. The Project would support the vision and purpose of the adopted General Plan Framework and land use plans in a manner that is complementary to the goals and policies of the City as it relates to housing.

The General Plan Framework identifies the following goals in relation housing Citywide.

- *An adequate supply of housing accessible to persons of all income levels*
- *A City of residential neighborhoods that maintains a sense of community by conserving and improving existing housing stock*
- *Housing opportunities accessible to all City residents without discrimination, including groups with special needs*
- *Preservation of the City's stable single-family residential neighborhoods.*
- *Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.*
- *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Housing Element Policy

- *Discourage development, demolition and conversion that contribute to the loss of affordable housing and encourage one for one replacement (based on bedroom count) of demolished affordable units.*
- *Actively promote the financing of affordable housing.*
- *Support public and private programs to maximize home ownership opportunities (including homeowner counseling/training) through provision of private and public programs such as subsidized interest loans, reduced down payments and loan counseling and packaging.*

The Project does not conflict with and is consistent with the stated goals related to housing in the City's General Plan Framework Element and the City's Housing Element. Therefore, no impact would occur, and no further analysis is necessary.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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. A significant impact would occur if a proposed project would result in the loss of availability of known mineral resources of regional value or locally important mineral resource recovery site. According to the City's General Plan Conservation Element, the Project Area has no lots classified by the City as containing significant mineral deposits nor is it designated for mineral extraction land use²⁰. In addition, the Project itself does not propose or approve development or expand any land uses. Therefore, the Project would not result in the loss of availability of any known mineral resource that would be of value to the region, and no impact would occur.

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. A significant impact would occur if a proposed project would result in the loss of availability of known mineral resources of regional value or locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. As discussed in XII (a), there are no portions of the Project Area that are designated as a mineral resource as delineated in the City's General Plan Conservation Element. Therefore, the Project would result in no impact related to the loss of availability of a locally important mineral resource recovery site as delineated on a local general plan, specific plan or other land use plan.

²⁰ City of Los Angeles General Plan, Conservation Element, Exhibit A Mineral Resources. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed on August 20, 2020.

XIII. NOISE

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project result in:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. For a project located within the vicinity of a private airstrip or 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. The Citywide noise regulations are included in the LAMC, Chapter XI, Section 111.03 which sets forth presumed day/night ambient noise levels based on zones. Presumed ambient noise levels for residential zones are 50 dB(A) during the day and 40 dB(A) during the night and 60 dB(A) during the day and 55 dB(A) during the night for commercial uses. Section 112.05 of the LAMC establishes that between the hours of 7 a.m. and 10 p.m. a maximum noise level for construction equipment is 75 dB(A) at a distance of 50 feet when operated within 500 feet of a residential zone. Construction activity could result in temporary increases in ambient noise levels in the project area on an intermittent basis. Noise levels could fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

The Project consists of an ordinance to adopt regulations and procedures to apply the Mello Act in the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The Project by itself does not propose or approve development, construction or any ground disturbing activity and does not change or expand any allowable land uses. Any future development in the Project Area would need to comply with the Citywide Noise Regulations. Thus, it is not anticipated that a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies would be expected. A less than significant impact would occur, and no further analysis is needed.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

No Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation. Construction activities can generate varying degrees of vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. Unless heavy construction activities are conducted extremely close (within a few feet) to the neighboring structures, vibrations from construction activities rarely reach the levels that damage structures.

The Project is limited to an ordinance to adopt procedures and regulations to apply the Mello Act to the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. The Project does not propose or approve any development project, operational use of any equipment, and does not directly result in construction activities. Therefore, the Project is not expected to generate excessive groundborne vibration or groundborne noise levels. Consequently, the Project would result in no impacts and no further analysis is required.

c) For a project located within the vicinity of a private airstrip or 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. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. The Project Area is located within two miles of a public airport or public use airport, the Los Angeles International Airport and the Santa Monica Municipal Airport. However, the Project is limited to an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone and to establish an affordable housing trust fund in the Coastal Zone. The Project does not propose or approve any development or any ground disturbing activity which would expose people residing or working in the Project Area to excessive noise levels located within the vicinity of a public or private airport. As such, the Project would have no impact and no further analysis is required.

XIV. POPULATION AND HOUSING

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <p>a. Induce substantial unplanned 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)?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) Induce substantial unplanned 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. A significant impact would occur if a proposed project would induce substantial population growth by locating new development such as homes, businesses or infrastructure, with the effect of substantially inducing unplanned growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project would not induce substantial population growth in an area directly or indirectly. The increase in residential population resulting from the Project would not be considered substantial in consideration of anticipated growth for the Coastal Zone and is within the Southern California Association of Governments' (SCAG) 2020 population projections for the City in their 2016-2040 Regional Transportation Plan. The Project is limited to an ordinance to adopt regulations and procedures to apply the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project does not propose or approve any development including new homes or businesses nor does it change or expand any land uses. Therefore, it is not anticipated that the Project will induce substantial unplanned growth in the Project Area. Additionally, the Project does not propose to change or add roads or other infrastructure that would induce such growth. Therefore, a less than significant impact related to population growth would occur.

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

Less Than Significant Impacts. A significant impact would occur if a proposed project would displace a substantial quantity of existing residences or a substantial number of people or housing units necessitating construction of replacement housing elsewhere. The Project would not result in displacement of substantial numbers of existing housing or people necessitating the construction replacement housing elsewhere. The Project is limited to an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project does not propose or approve any development, it would not displace substantial numbers of existing housing or people necessitating construction of replacement housing elsewhere. In fact, the Project regulations require replacement of housing units at a one for one replacement ratio in the Project Area. Compliance with this regulation would minimize displacement impacts to less than significant. No further analysis is required.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Fire protection?

Less Than Significant Impact. The Los Angeles Fire Department (LAFD) is responsible for providing fire prevention, protection and emergency medical services to the Project Area. A significant impact would occur if the LAFD requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain services. Table 7, LAFD Fire Station Serving the Project Area provides the LAFD Fire Stations servicing the Project Area.

Table 7: Fire Stations within the Project Area²¹

Fire Stations	Coastal Zone Subarea	Site Address
Fire Station 23	Subarea 1 Palisades	17281 Sunset Boulevard
Fire Station 19	Subarea 1 Palisades	12229 West Sunset Boulevard
Fire Station 69	Subarea 1 Palisades	15045 Sunset Boulevard
Fire Station 63	Subarea 2 Venice	1930 Shell Avenue
Fire Station 67	Subarea 2 Venice	5451 Playa Vista Drive

²¹ Los Angeles Fire Department Fire Stations. <https://www.lafd.org/fire-stations/station-results>, accessed on August 21, 2020

Fire Station 51	Subarea 2 Venice	10435 Sepulveda Boulevard
Fire Station 101	Subarea 3 Harbor	1414 25th Street
Fire Station 48	Subarea 3 Harbor	1601 South Grand Avenue
Fire Station 112	Subarea 3 Harbor	444 South Harbor Boulevard, Berth 86
Fire Station 40	Subarea 3 Harbor	330 Ferry Street
Fire Station 49	Subarea 3 Harbor	400 Yacht Street, Berth 194

The proposed Project is limited to an ordinance to adopt regulations and procedures to apply the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. Since the proposed Project does not propose or approve any development, it would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, the Project would result in a less than significant impact related to fire protection. No further analysis is required.

b) Police protection?

Less Than Significant Impact. The Los Angeles Police Department (LAPD) is responsible for providing police protection services to the Project Area. A significant impact would occur if the LAPD could not adequately serve a proposed project, necessitating a need for a new or physically altered station, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other service objectives.

Table 8, Police Stations Serving the Project Area, provides the LAPD Stations within close proximity to the Project Area.

Table 8: Police Stations within the Project Area²²

Police Stations	Coastal Zone Subarea	Site Address
WEST LOS ANGELES Community Police Station	Subarea 1 Palisades	1663 BUTLER AVE.
PACIFIC Community Police Station	Subarea 2 Venice	12312 CULVER BLVD.
HARBOR Community Police Station	Subarea 3 Harbor	2175 JOHN S. GIBSON BLVD.

²² Los Angeles Police Department. http://lapd-assets.lapdonline.org/assets/pdf/Citywide_09.pdf accessed on August 24, 2020

As previously stated, the Project consists of an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone and to establish an affordable housing trust fund in the Coastal Zone. The Project does not propose or approve development in the Project Area. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. It is not anticipated that more police services would be required in the Project Area as a result of the Project, therefore there would be a less than significant result related to Police Services.

c) Schools?

Less than significant Impact. The Project Area is located within the boundaries of the Los Angeles Unified School District (LAUSD). A significant impact would occur if a proposed project would include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the school district. The Project is an ordinance that adopts procedures and regulations to apply the Mello Act in the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. Table 9 Schools Serving the Project Area provides the schools located within the Project Area.

Table 9: Schools within the Project Area

School	Coastal Zone Subarea	Site Address
Marquez Charter School	Subarea 1 Palisades	16821 Marquez Ave
Palisades Charter High School	Subarea 1 Palisades	15777 Bowdoin St
Canyon Elementary School	Subarea 1 Palisades	421 Entrada Dr
Ánimo Venice Charter High School	Subarea 2 Venice	820 Broadway St
Broadway Elementary School	Subarea 2 Venice	1015 Lincoln Blvd
Broadway Elementary School Mandarin Language Immersion Program	Subarea 2 Venice	1015 Lincoln Blvd
Broadway Elementary School Spanish Language Immersion Program	Subarea 2 Venice	1015 Lincoln Blvd
Westminster Avenue Elementary School (Math & Technology/Environmental Studies Magnet)	Subarea 2 Venice	1010 Abbot Kinney Blvd
Westside Global Awareness Magnet	Subarea 2 Venice	104 Anchorage St
15th Street Elementary School	Subarea 3 Harbor	1527 S Mesa St
Alliance: Alice M. Baxter College-Ready High School	Subarea 3 Harbor	461 W 9th St
Angel's Gate Continuation High School	Subarea 3 Harbor	3607 S Gaffey St

Point Fermin Elementary School (Marine Sciences Magnet)	Subarea 3 Harbor	3333 Kerckhoff Ave
San Pedro Senior High (Marine Science, Math Science, & Technology Magnet)	Subarea 3 Harbor	1001 W 15th St
San Pedro Senior High (Police Academy Magnet)	Subarea 3 Harbor	1001 W 15th St
White Point Elementary School	Subarea 3 Harbor	1410 Silvius Ave

The Project would not introduce any new population into the area to require the construction of new or physically altered school facilities since the Project does not propose or approve any development project. Any future development as a result of the Project would be subject to California Government Code Section 65995, which would allow LAUSD to collect impact fees from developers of new residential and commercial space. Conformance to California Government Code Section 65995 is deemed to provide full and complete mitigation of impacts to school facilities. Therefore, the Project would result in a less than significant impact to public schools.

d) Parks?

Less than significant Impact. The City of Los Angeles Department of Recreation and Parks (RAP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The RAP operates and maintains over 16,000 acres of parkland and 444 park sites. A significant impact would occur if a proposed project would exceed the capacity or capability of the local park system to serve the proposed project resulting in the need for new or physically altered park, the construction of which could cause substantial adverse impacts. Table 10, Parks Serving the Project Area provides the parks located within the Project Area.

Table 10: Parks within the Project Area

Parks	Coastal Zone Subarea	Site Address
Portrero Canyon Park	Subarea 1 Palisades	15200 - 15499 De Pauw St
Santa Ynez Canyon Park	Subarea 1 Palisades	17399 Vereda De La Montura
Temescal Gateway Park	Subarea 1 Palisades	15601 Sunset Blvd.
Asilomar View Park	Subarea 1 Palisades	15900 Asilomar Blvd
Palisades Park	Subarea 1 Palisades	1450 Ocean
Titmouse Park	Subarea 2 Venice	415 Culver Blvd
Triangle Park	Subarea 2 Venice	Oxford Ave & Marr St
Del Rey Lagoon Park	Subarea 2 Venice	6660 Esplanade Place
Glen-Alla Park	Subarea 2 Venice	4601 Alla Rd

Canal Park	Subarea 2 Venice	200 Linnie Canal,
Venice of America Centennial Park	Subarea 2 Venice	501 S Venice Blvd
Marco Triangle	Subarea 2 Venice	Venice, CA 90291
Marco Place Parkway	Subarea 2 Venice	Between Marco Court and Superba Court
Crescent Place Triangle	Subarea 2 Venice	1646 Crescent Place
Trask Triangle Park	Subarea 2 Venice	Trask St (Earldom Ave)
Amoroso Triangle	Subarea 2 Venice	
Nowita Triangle	Subarea 2 Venice	
Via Dolce Park	Subarea 2 Venice	3503 Via Dolce
Vista Del Mar Park	Subarea 2 Venice	Century Bl & Vista Del Mar,
Venice Beach Recreation Center	Subarea 2 Venice	1800 Ocean Front Walk
Venice Beach Skate Park	Subarea 2 Venice	1800 Ocean Front Walk
Joan Milke Flores Park	Subarea 3 Harbor	3601 Gaffey
Lookout Point Park	Subarea 3 Harbor	3515 S. Gaffey
Point Fermin Park	Subarea 3 Harbor	807 W. Paseo Del Mar
San Pedro Plaza Park	Subarea 3 Harbor	7000 S. Beacon
John S. Gibson Jr. Park	Subarea 3 Harbor	550 S. Harbor
Harbor View Memorial Park	Subarea 3 Harbor	2411 S Grand Ave
Cabrillo Beach Bath House	Subarea 3 Harbor	3800 Stephen M. White Drive

The Project is an ordinance to adopt regulations and procedures to apply the Mello Act to the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project does not propose or approve any development and does not directly or indirectly increase population in the Project Area. Therefore, it is not anticipated that the Project would create unplanned capacity or service level problems or result in substantial physical impacts associated with the provision or new or altered parks facilities. Accordingly, the Project would result in a less than significant impact on park facilities.

e) Other public facilities?

Less than significant Impact. A significant impact would occur if a proposed project would result in substantial employment or population growth that could generate a

demand for other public facilities, such as libraries, which exceed the capacity available to serve the project area, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts. The Los Angeles Public Library (LAPL) provides library services within the City of Los Angeles. The LAPL provides services at the Central Library, 8 Regional Branch Libraries and 72 Community Branch Libraries and 4 Bookmobiles.

The Project Area is served by the following library facilities, as listed in Table 12 Libraries Serving the Project Area.

Table 11: Libraries within the Project Area

Libraries	Coastal Zone Subarea	Site Address
Palisades Branch Library	Subarea 1 Palisades	861 Alma Real Drive
Venice Abbot Kinney Memorial Branch Library	Subarea 2 Venice	501 S. Venice
San Pedro Regional Library	Subarea 3 Harbor	931 Gaffey Street

As previously mentioned, the Project consists of an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone and to establish an affordable housing trust fund in the Coastal Zone. The Project does not propose or approve any development and would not cause a substantial increase in population. The Project would not create substantial capacity or service level problems that would require the provision of new or expanded public facilities in order to maintain an acceptable level of service for libraries and other public facilities. As such, there would be no increase in demand for library services and resources and no need for additional library resources or facilities to be constructed. Therefore, the Project would result in a less than significant impact to libraries and other public facilities. No further analysis is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. A significant impact would occur if a project resulted in substantial population growth that would generate a demand for recreation and park services such that substantial physical deterioration of the park facilities would occur or be accelerated. The Department of Recreation and Parks operates and maintains over 16,000 acres of parkland and 444 park sites²³. Additionally, the Project Area is located near many regional parks and State Parks including Topanga State Park and Yvonne Brathwaite Burke Park. The Project is an ordinance to adopt regulations and procedures to apply the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project, by itself, does not propose or approve any development that would directly or indirectly increase population in the Project Area that would increase the use of existing and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. As such, the Project would create a less than significant impact on park and recreation facilities. No further analysis is required.

²³ Los Angeles Recreation and Parks. <https://www.laparks.org/department/who-we-are> accessed on September 1, 2020.

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. A significant impact would occur if a project resulted in substantial population growth that would generate a demand for recreation and park services requiring the construction of new or physically altered park facilities within the project area. The Department of Recreation and Parks operates and maintains 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, and 12 museums located throughout the City²⁴. The Project is limited to an ordinance to adopt regulations and procedures to apply the Mello Act to the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project, by itself, does not propose or approve any development which would require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, a less than significant impact on park and recreation facilities would occur. No further analysis is required.

²⁴ Los Angeles Recreation and Parks. <https://www.laparks.org/department/who-we-are> accessed on September 1, 2020.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

No Impact. A significant impact may occur if a project would conflict with a program, plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. The City of Los Angeles has adopted programs, plans ordinances and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. The Circulation Element of the City's General Plan, the Mobility Plan 2035, offers a comprehensive vision and set of policies and programs for the City and aims to provide streets that are safe and convenient for all users. Furthermore, the Department of Transportation's Vision Zero Los Angeles aims to reduce transportation fatalities to zero by using extensive crash data analysis to identify priority corridors and intersections and applying safety countermeasures.

The Project consists of an ordinance to adopt regulations and procedures to apply the Mello Act in the Coastal Zone and establish an affordable housing trust fund in the Coastal Zone. The Project does not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Additionally, the Project does not increase population or provide land use incentives that would increase the density, FAR or height of development in the Project Area. The Project does not propose or approve any development and is not expected to

generate significant traffic impacts, which would conflict with an applicable plan, ordinance or policy, related to traffic. Therefore, the Project would result in no impacts related to the circulation system. No further analysis is required.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. A significant impact may occur if a project's vehicle miles traveled substantially increase compared to existing counts. The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) which states that land use projects that indicate VMT exceeding an applicable threshold of significance may indicate a significant impact. Pursuant to CEQA Guidelines section 15064.3(b)(1), Projects that decrease VMT in a proposed project area compared to existing conditions should be presumed to have a less than significant transportation impact. CEQA Guidelines section 15064.3, subdivision (b), also states that transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. The Project is an ordinance to adopt regulations and procedures to apply the Mello Act to the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. No Vehicle Miles Traveled (VMT) would be generated from the Project that would otherwise occur from any new development since no development project is approved or proposed as part of the Project. Therefore, the Project would result in less than significant impacts related to any applicable congestion management plan. No further analysis is required.

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

No Impact. A significant impact would occur if a proposed project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. No hazardous design features or incompatible land uses would be introduced with the Project that would create significant hazards to the surrounding roadways. The Project is an ordinance to adopt procedures and regulations to apply the Mello Act to the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project does not propose or approve any development project nor does it change or expand any land uses, thus no increase in hazards due to geometric design features or incompatible uses would occur to local vehicular circulation routes and patterns, or impede public access or travel on any public rights of way. The Project would result in no impacts related to traffic hazards. No further analysis is required.

d) Result in inadequate emergency access?

No Impact. A significant impact may occur if a project design does not provide emergency access meeting the requirements of the Fire Department or threatens the ability of emergency vehicles to access and serve a project site or adjacent uses. As

previously identified in Section IX(f) per the City's General Plan Safety Element (Exhibit H, Critical Facilities & Lifeline Systems, 1996), the nearest emergency/disaster routes serving the Project Area is: Subarea 1 Palisades - Sunset Blvd, Subarea 2 Venice - Venice Blvd., Lincoln Blvd., Sepulveda and Manchester, Subarea 3 San Pedro - Harbor - Pacific, Western, 25th, Alameda, 9th, Paseo del Mar, Harbor and Figueroa. The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Area or surrounding area. The Project is an ordinance to adopt regulations and procedures to apply the Mello Act to the Coastal Zone and to establish an affordable housing trust fund in the Coastal Zone. The Project does not propose or approve any development or change or expand any land uses. As such, the Project would not require the closure of any public or private streets, would not impede emergency vehicle access, would not impede access to the City's designated disaster routes, and would not impair the City's emergency response plan. Therefore, the Project would result in no impact with respect to inadequate access to emergency routes.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Less Than Significant Impact. 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 project if the Tribe has submitted a request in writing to be notified of proposed projects. 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 Area. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB52 also gives lead agencies the discretion to determine supported by substantial evidence, whether a resource qualifies as a TCR.

On October 21, 2020, AB52 Tribal Consultation Notice letters were mailed to the following nine (9) California Native American Tribes via certified mail and subsequently emailed on October 22, 2020. The notice described the Project and requested any information regarding resources that may exist on or near the Project Area.

- Fernandeno Tataviam Band of Mission Indians
- Gabrieleno Band of Mission Indians - Kizh Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrielino-Tongva Tribe
- San Fernando Band of Mission Indians
- Soboba BAnd of Luiseno Indians
- Torres Martinez Desert Cahuilla Indians

Two Tribes, the Fernandeno Tataviam Band of Mission Indians and Gabrieleno Band of Mission Indians – Kizh Nation responded to the notification requesting to initiate tribal consultation. Tribal Consultation with the Fernandeno Tatviam Band of Mission Indians Tribe was initiated on November 2, 2020. After providing background and discussing the proposed Project, the Tribe agreed that the proposed Project would not have an impact on tribal cultural resources and agreed to conclude AB52 Consultation. While communicating with the Gabrieleno Band of Mission Indians – Kizh Nation to set up an initial Tribal Consultation meeting, the Tribe decided not to move forward with consultation after learning the Project is limited to an ordinance and no development, construction or ground disturbing activity is involved with the proposed Project. To date, no other additional information and materials related to tribal cultural resources have been submitted.

The Project consists of an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. As previously mentioned, the Project does not consist of any development project, includes no ground disturbing activity or any other related construction activity. Any future development projects requiring a Negative Declaration, Mitigated Negative Declaration or an Environmental Impact Report will need to comply with AB 52 and conduct the necessary research and prepare the necessary reports to determine if the individual development project would cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, it is not anticipated that the Project would result in impacts related to potential substantial adverse changes in the cultural significance of a tribal cultural resource as defined in Public Resources Code section 21074 that is listed

or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources tribal cultural resources. No further analysis is required.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. See response to Section XVIII (a) above. Further, as mentioned in the previous section, any future development projects requiring a Negative Declaration, Mitigated Negative Declaration or an Environmental Impact Report will need to comply with AB52 and conduct the necessary research and/or prepare the necessary reports to determine if the individual development project would cause a substantial adverse change in the significance of a tribal cultural resources. As previously stated, the Project does not include a development project or any ground disturbing activity or any other related construction activity. Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource resulting in less than significant impacts. No further analysis is required.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

No Impact. A significant impact would occur if a proposed project would exceed water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded.

The Project does not propose or approve development or ground disturbing activity. The Project itself is not intensifying any of the existing allowable land uses, thus, existing conditions are not expected to significantly change related to public facilities. Future development projects would be reviewed on a case-by-case basis and depending on the scope of the development project would be subject to its own environmental review. Therefore, the proposed Project would not increase the demand for water and the generation of wastewater, consequently increasing the demand of treatment facilities compared to existing conditions such that physical expansion of the treatment facilities or construction of a new treatment facility may be required. Additionally, the Project by itself would not increase consumption of electrical power and natural gas such that existing supply facilities may need to be expanded or relocated. Similarly, telecommunications facilities would not need to be expanded or relocated as the Project itself does not propose or approve development. As such, the Project does not propose nor will it require construction of new water, wastewater treatment, storm water drainage facilities, electric power, natural gas, or telecommunication facilities or expansion of existing facilities. Thus, because the Project does not intensify or change any land uses and does not propose or approve any development or alter existing development or development patterns. No impact would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact would occur if a proposed project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City and conducts water planning based on forecast population growth. As the Project Area is located within an urban environment, any future development within the Project Area would likely be connected to the City's water line and serviced by LADWP. Prior to any construction activities for future development projects, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the project, and any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately serve the project would be undertaken as part of the project.

The Project is an ordinance to adopt procedures and regulations to apply the Mello Act to the Coastal Zone and to establish an affordable housing trust fund in the Coastal Zone. The Project does not intensify or change any land uses and does not alter existing development or development patterns. No development project is proposed or approved as part of the Project. Thus, the Project would be consistent with the anticipated Citywide growth, and the Project demand for water is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water treatment facilities beyond those already considered in the LADWP 2015 Urban Water Management Plan (UWMP). Therefore, it is not reasonably foreseeable that there would be insufficient water supplies available to serve the Project Area and future development in the Project Area during the normal, dry, and multiple dry years. Less than significant impacts would occur, no further analysis is needed.

c) 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?

No Impact. See response to Section XIX (b) above. As previously mentioned, LADWP conducts water planning based on population growth forecasts. The Project is not anticipated to impact population growth in the City since the Project, by itself does not propose or approve any development project. As such, the Project will not change demand for water or wastewater treatment. The Project is limited to an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. The Project does not intensify or change any land uses and does not alter existing development or development patterns. Therefore, no impact will occur as it relates to adequate capacity to serve the Project's projected demand for wastewater treatment and the provider's existing commitment.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The Los Angeles Bureau of Sanitation (LABOS) and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the Project Area. Construction waste materials are expected to be typical construction debris, including wood, paper, glass, plastic, metals, cardboard and green wastes. However, the Project will not produce a significant amount of solid waste since the Project by itself does not propose or approve any development. Waste generated by future individual development projects would be assessed on a case-by-case basis through the environmental review process. Pursuant to the California Green Building Code, individual project applicants would be required to recycle/divert 65 percent of the construction waste (CALGreen Sections 4.408 and 5.408). Since the Project does not involve a development and does not intensify or change any land uses and does not alter existing development or development patterns, impacts are expected to be less than significant. Therefore, the Project is expected to have a less than significant impact related to the generation of solid waste in excess of State or local standards, exceed the capacity of local infrastructure or impair the attainment of solid waste reduction goals. No further analysis is necessary.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project does not intensify or change any land uses and does not alter existing development or development patterns. The Project, by itself, does not propose or approve any development that would generate solid waste. Current and future individual development projects are required and would continue to be required to comply with all federal, state, and local statutes and regulations related to solid waste. All applicable

regulations would ensure that the impact to reduction statutes and regulations related to solid waste is less than significant.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities.

According to the Safety Element, the Project Area is located along the following designated disaster routes: Subarea 1 Palisades - Sunset Blvd, Subarea 2 Venice - Venice Blvd., Lincoln Blvd., Sepulveda and Manchester, Subarea 3 San Pedro - Harbor - Pacific, Western, 25th, Alameda, 9th, Paseo del Mar, Harbor and Figueroa. However, the Project does not intensify or change any land uses and does not alter existing development or development patterns. The Project also does not propose or approve development, nor does it modify any existing regulations regarding permanent street

closures, uses, intensities, or densities of development which may directly or indirectly impair an adopted emergency response plan or emergency evacuation plan.

Further, future development that would occur in the Project Area would be required during construction to comply with construction management plans that would be implemented to ensure adequate circulation and emergency access. As such, the Project would not impair an adopted emergency response plan or emergency evacuation plan, no impacts would occur, and no further analysis is needed.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. A portion of the Project Area is located within a High Fire Hazard Severity Zone. Subarea 1 Palisades is identified by the City's Safety General Plan Element Exhibit D, Selected Wildfire Hazard Areas, as an area designated as a wildfire hazard area²⁵. The Project Area is mostly within an urbanized area with the exception of Subarea 1 Palisades which has large sections of undeveloped land. However, the Project does not propose or approve a development project and does not intensify or change any land uses nor does it alter existing development or development patterns, including in Wildfire Hazard Areas. Therefore, impacts would be less than significant relative to slope, prevailing winds and other factors that could exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, no further analysis is needed.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project does not propose or approve development or any construction and does not change or expand any land uses. The Project is limited to an ordinance to adopt procedures and regulations to apply the Mello Act to the Coastal Zone and establish the Coastal Zone Affordable Housing Trust Fund. Given the Project's scope, no impacts would occur that would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Thus, the Project would result in no impact and no further analysis is needed.

²⁵ City of Los Angeles, Safety Element, Exhibit D Wildfire Hazard Area Map, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed on August 25, 2020.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. As discussed in Section IX (g) and Section XX (b) above, a portion of the Project Area - Subarea 1 Palisades is located within a City-designated Wildfire Hazard Area. However, the Project does not propose or approve development and does not change or expand any land uses and does not alter existing development or development patterns. Therefore, it is anticipated that the Project will result in a less than significant impact as it relates to exposure of people or structures to significant risks including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, no further analysis is needed.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially 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. Based on the analysis in this Initial Study, the Project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. Compliance

with existing regulations would reduce impacts to less than significant levels. 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. The Project is an ordinance to adopt procedures and regulations to apply the Mello Act in the Coastal Zone and to establish the Coastal Zone Affordable Housing Trust Fund. Consistent with the Mello Act and the existing Interim Administrative Procedures, the ordinance proposes permanent regulations to preserve and increase the supply of affordable housing in the Coastal Zone by requiring replacement housing, limiting the replacement of housing with other types of uses that are non-Coastal related and adopting an inclusionary requirement. The Project does not propose or approve any development projects, does not change or expand any land uses and does not alter any existing development or development patterns. As such, the Project would not potentially result in any significant impacts and would not have the potential to contribute to cumulative impacts. The Project is not anticipated to result in substantial new development and as such will not contribute to cumulative impacts or have cumulatively considerable impacts.

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

No impact. As identified throughout the analysis, the Project would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. No other impacts have been identified that would result in adverse effects. No impacts would occur, no further analysis is needed.