

# Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning



**Project title:** Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP)

**Lead agency name and address:** Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

**Contact Person and phone number:** Thuy Hua, 213.974.6461

**Project sponsor's name and address:**

Los Angeles County Department of Regional Planning

320 West Temple Street, 13<sup>th</sup> Flr

Los Angeles, California 90012

**Project location:** Los Angeles County (County-wide)

*APN:* \_\_\_\_\_ *USGS Quad:* \_\_\_\_\_

**Gross Acreage:** Approximately 1,696,000 acres (approximately 2,650 square miles)

**General plan designation:** Implementation of the Draft 2045 CAP, once approved, would occur throughout unincorporated Los Angeles County in all General Plan designations.

**Community/Area wide Plan designation:** Implementation of the Draft 2045 CAP, once approved, would occur throughout unincorporated Los Angeles County in all Community Plan and Area Plan designations.

**Zoning:** Implementation of the Draft 2045 CAP, once approved, would occur throughout unincorporated Los Angeles County in all zoning designations.

**Description of project:**

## Background

The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan (General Plan) (Los Angeles County 2015). The 2020 CCAP projected greenhouse gas (GHG) emissions from community activities in the unincorporated areas of Los Angeles County (County) to the year 2020 and identified actions to reduce those emissions below the level prescribed by AB 32, the Global Warming Solutions Act of 2006 (Los Angeles County 2015). Since then, various actions have been implemented and expanded to include other related efforts to reduce GHG emissions.

Generally, statewide targets are to reduce emissions to 40 percent below 1990 levels by 2030 (SB 32) and achieve carbon neutrality by 2045 (EO B-55-18). While not required to do so by law, the Draft 2045 CAP will allow the County to demonstrate how local actions can support these goals and ensure that the County contributes to the reduction of GHG emissions in alignment with the goals of the state and the OurCounty

Sustainability Plan (Los Angeles County 2019), including a 25 percent reduction in GHG emissions below 2015 levels by 2025, a 50 percent reduction below 2015 levels by 2035, and carbon neutrality by 2045.

The 2020 CCAP projected GHG emissions based on the General Plan growth to the year 2020 and identified actions which would reduce those emissions below the identified state targets at the time. The Draft 2045 CAP will provide a similar approach to the reduction of GHG emissions from community activities, including future development projected to 2030, 2035 under the General Plan, and 2045. Similar to the 2020 CCAP, the Draft 2045 CAP will be modeled with the land use assumptions, policies and implementation programs found within the General Plan (including the current Housing Element (6th Cycle), as well as within other County projects and programs.

In early 2020, the Department of Regional Planning (DRP) released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns, such as locating new housing developments away from existing sources of air pollution, and ensuring revenues from the state's Cap and Trade program benefit the County's disadvantaged communities; and a new development review consistency checklist to allow projects to streamline CEQA compliance for their projects by using the CAP, per CEQA Guidelines § 15183.5.

#### Contents of the Draft 2045 CAP

The Draft 2045 CAP will contain an executive summary and four chapters. Appendices A through C will provide additional detail on topics covered within the Draft 2045 CAP. A brief summary of each component follows:

- **Executive Summary:** The executive summary will include a synopsis of the Draft 2045 CAP, including its goals, GHG inventories and business-as-usual (BAU) forecasts, new 2030/2035/2045 targets, revised GHG reduction actions and their impact, and implementation steps.
- **Chapter 1 – Introduction and Need:** This chapter will provide a summary of the latest climate change science and regulations, and discussion of policies implemented since the 2020 CCAP was adopted. Chapter 1 also will provide an overview of the climate hazards and risks expected in Los Angeles County under high and low emissions scenarios. A discussion on resilience and equity will also be included.
- **Chapter 2 – Emissions Inventory, BAU Forecasts, and GHG Reduction Targets:** This chapter will present the results of the 2010, 2015, and 2018 GHG inventories and the BAU forecasts for 2025, 2035, and 2045. It will also summarize the 1990 GHG emissions backcast as it relates to the CAP's emission reduction targets. It will include a discussion of each emission sector and its major sources of GHG emissions, and a concise trends analysis to compare the 2010 and 2015 inventories with the current 2018 inventory and identify the primary sources of change in emissions (i.e., economic growth or contraction, technology and regulatory changes, climatic conditions, differences in methods and datasets, and new emission factors). This chapter will also discuss the County's 2030, 2035, and 2045 targets.
- **Chapter 3 – GHG Emission Reduction Strategy:** This chapter will describe the series of GHG reduction actions (GRAs) needed for the County to achieve its reductions targets, and the timeline for implementation. Estimated GHG emission reductions for all state, regional, and local GRAs (and supporting actions) for each future target/forecast year will be provided. A high-level cost-benefit

analysis will be provided for each GRA, including co-benefits to public health, equity, community resilience, climate adaptation, and the economy. Details of quantification methods and assumptions will be provided in a technical appendix. The Draft 2045 CAP includes 11 overarching strategies and 26 measures, each of which has multiple implementing actions (GRAs). The differences among strategies, measures, and GRAs are as follows:

- Strategies aim for overarching goals within each emissions sector.
  - Measures are focused, sub-sector specific programs and goals to achieve each strategy; most measures include performance standards, which are designed to be quantified for GHG emission reductions. Measures will be achieved through individual implementing GRAs.
  - GRAs are the specific policies, programs, or tools that will be implemented for each measure. GRAs are intended to be implemented in a coordinated manner to make meaningful progress toward achieving the associated measure.
- **Chapter 4 – Implementation and Monitoring:** This chapter will include the Draft 2045 CAP implementation and monitoring program, outlining for each GRA the specific actions to be taken, the needs for operational and capital resources, policy and regulatory changes, and the department and/or other entities responsible for implementation. The implementation plan will include performance indicators for each GRA that will be used to track progress toward achieving each future target, which can be done on an annual basis. This chapter will also summarize CEQA provisions and any development project review requirements for CEQA streamlining.
  - **Appendix A – GHG Inventory Report:** This appendix will include a more detailed presentation of the County’s 2010, 2015, and 2018 GHG inventories, including a description of the protocols and quantification methods used to prepare them.
  - **Appendix B – GHG Reduction Action Quantification Methods:** This appendix will describe the methods used to quantify GHG reductions for all GRAs.
  - **Appendix C – CAP Consistently Checklist:** This appendix will include the consistency checklist for new development.

#### List of GHG Reduction Strategies and Measures

The Draft 2045 CAP is anticipated to include approximately 26 recommended GHG reduction measures. Each includes multiple implementing actions. The recommended GHG reduction measures are to be organized under the five main categories and 11 strategies listed below.

##### *Climate Leadership*

- Strategy 1: Lead by example towards carbon neutrality
  - Measure CL1: Develop a Sunset Strategy for all Oil and Gas operations
  - Measure CL2: Establish GHG Requirements for New Development

##### *Transportation*

- Strategy 2: Increase densities and diversity of destinations with an emphasis near transit
  - Measure T1: Increase Density Near High-Quality Transit Areas
  - Measure T2: Develop Land Use Plans Addressing Jobs/Housing Balance & Increase Mixed Use
- Strategy 3: Reduce single-occupancy vehicle trips

- Measure T3: Expand Bicycle & Pedestrian Network to Serve Residential, Employment, & Recreational Trips
- Measure T4: Encourage Transit, Active Transportation, & Alternative Modes of Transportation
- Measure T5: Parking Limitations & Removal of Parking Minimums
- Strategy 4: Institutionalize low-carbon transportation
  - Measure T6: Increase ZEV Market Share and Reduce Gasoline and Diesel Fuel Sales
  - Measure T7: Electrify County Fleet Vehicles
  - Measure T8: Accelerate Freight Decarbonization
  - Measure T9: Expand Use of Zero-Emission Technologies for Off-Road Vehicles & Equipment

#### *Building Energy & Water*

- Strategy 5: Decarbonize buildings and energy use
  - Measure E1: Procure Zero-Carbon Electricity
  - Measure E2: Transition Existing Buildings to All-Electric
  - Measure E3: Standardize All-Electric New Development
  - Measure E4: Other Decarbonization Actions
- Strategy 6: Increase generation and resilience of renewable energy
  - Measure E5: Increase Renewable Energy Production
  - Measure E6: Increase Energy Resilience
- Strategy 7: Improve efficiency of building energy use
  - Measure E7: Improve Energy Efficiency of Existing Buildings
- Strategy 8: Promote water conservation
  - Measure E8: Increase Use of Recycled Water and Gray Water Systems
  - Measure E9: Reduce Indoor and Outdoor Water Consumption

#### *Waste*

- Strategy 9: Reduce and divert waste
  - Measure W1: Increase Organic Waste Diversion
  - Measure W2: Maximize Countywide Diversion Rate
  - Measure W3: Institutionalize Sustainable Waste Systems & Practices

#### *Agriculture, Forestry, and Other Land Use*

- Strategy 10: Conserve Forests and Working Lands
  - Measure A1: Conserve Agricultural and Forest Lands

- Strategy 11: Promote Carbon Sequestration and Sustainable Agriculture
  - Measure A2: Implement Regenerative Agricultural Practices
  - Measure A3: Expand the County’s Tree Canopy & Green Spaces

References

County of Los Angeles, 2015. Unincorporated Los Angeles County Community Climate Action Plan 2020 (2020 CCAP). August 2015. URL: [https://planning.lacounty.gov/assets/upl/project/ccap\\_final-august2015.pdf](https://planning.lacounty.gov/assets/upl/project/ccap_final-august2015.pdf).

County of Los Angeles, 2019. Los Angeles Countywide Sustainability Plan (OurCounty). Adopted August 9, 2019.

**Surrounding land uses and setting:** Los Angeles County is geographically one of the largest counties in the country. The County stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. Los Angeles County includes two offshore islands, Santa Catalina Island and San Clemente Island.

The project area includes only the unincorporated areas of Los Angeles County (unincorporated areas), which are comprised of approximately 2,650 square miles (approximately 65 percent of the total land area of Los Angeles County) as identified in Figure 1, Map of Unincorporated Los Angeles County.<sup>1</sup> Los Angeles County is geographically diverse. The unincorporated areas in the northern portion of the County are covered by large amounts of sparsely populated land, and include the Angeles National Forest, and parts of the Los Padres National Forest and the Mojave Desert. In the western portion of Los Angeles County, the unincorporated areas include Marina del Rey and the Santa Monica Mountains. The unincorporated areas in the southern portion of Los Angeles County consist of many non-contiguous land areas, which are often referred to as the County’s “unincorporated urban islands” including Hacienda Heights, Rowland Heights, and unincorporated areas in the San Gabriel Valley.

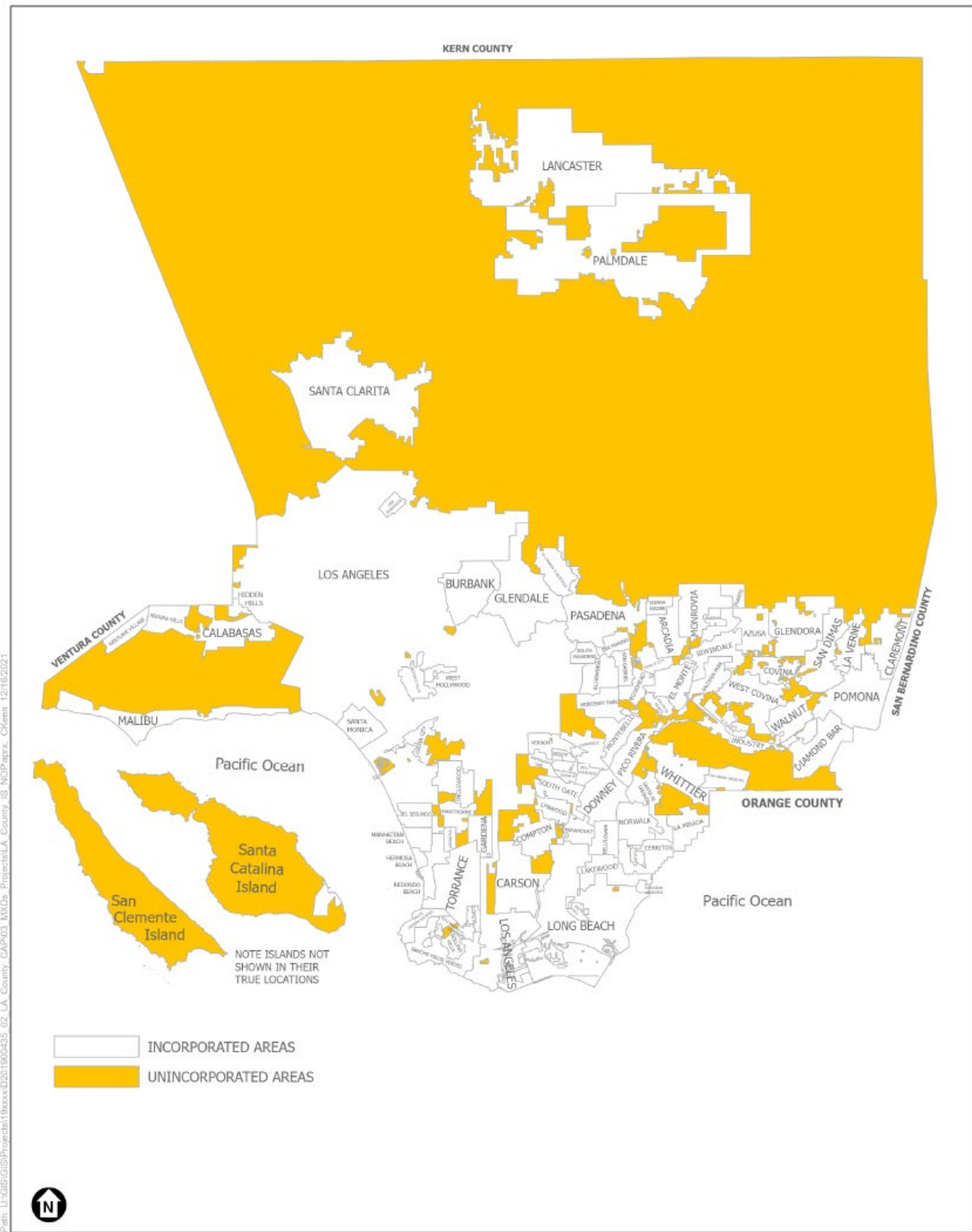
**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

The Los Angeles County CAP update began in the summer of 2019. The analysis of potential emission reductions began at the end of 2019 along with the initial drafting of an Initial Study. During this time, the tribal consultation process required by Assembly Bill 52 (AB 52) (Public Resource Code § 21080.3.1 et seq.) began.

On November 13, 2019, five California Native American Tribes were notified via U.S. Mail of the CAP update in compliance with AB 52. None of the tribes notified subsequently responded in writing or otherwise requested AB 52 consultation. Receiving no responses, the AB 52 tribal consultation process was completed and concluded in December of 2019.

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<sup>1</sup> The Los Angeles County, 2015. Los Angeles County General Plan. Available online: <https://planning.lacounty.gov/generalplan>. Adopted October 6, 2015.



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SOURCE: Los Angeles County Climate Action Plan  
March 2020 Public Review Draft

Los Angeles County 2045 Climate Action Plan (2045 CAP)

**Figure 1**  
Map of Unincorporated Los Angeles County



**Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):**

Los Angeles County has approval authority over the Draft 2045 CAP. Approval from other public agencies is not required. The County would certify the Final Environmental Impact Report (EIR), approve the General Plan Amendment, and adopt the Draft 2045 CAP.

**Reviewing Agencies:**

*Responsible Agencies*

- None
- Regional Water Quality Control Board:
  - Los Angeles Region
  - /  Lahontan Region
- Coastal Commission
- Army Corps of Engineers
- LAFCO

*Special Reviewing Agencies*

- None
- Santa Monica Mountains Conservancy
- National Parks
- National Forest
- Edwards Air Force Base
- Resource Conservation District of Santa Monica Mountains Area
- 

*Regional Significance*

- None
- SCAG Criteria
- Air Quality
- Water Resources
- Santa Monica Mtns. Area
- 

*Trustee Agencies*

- None
- State Dept. of Fish and Wildlife
- State Dept. of Parks and Recreation
- State Lands Commission
- University of California (Natural Land and Water Reserves System)

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially significant impacts affected by this project.

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

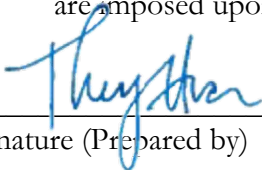
DETERMINATION: (To be completed by the Lead Department.)

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

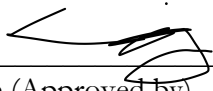
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to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



\_\_\_\_\_  
Signature (Prepared by)

December 22, 2021

\_\_\_\_\_  
Date



\_\_\_\_\_  
Signature (Approved by)

December 22, 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 the Lead Department 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 Department 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 mitigation measures has reduced an effect from "Potentially Significant Impact" to a "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 Section XVII, "Earlier Analyses," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 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) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

## 1. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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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?**                                                                               

Los Angeles County is a large region with a diverse visual setting that includes both built and natural environments. Natural environments in the region include the coastline, beaches, foothills, mountains, ridgelines, and deserts. The urban and built environments within the County include industrial, commercial, residential, office, institutional, and public land uses (LA County 2015). Topography in the region such as the San Gabriel Mountains, Verdugo Hills, Santa Susana Mountains, Simi Hills, Santa Monica Mountains, and Puente Hills shape the topography within the region and create distinct communities with varying aesthetic character. These landforms, along with the coastline, define the scenic character of the region. The General Plan does not identify specific scenic vistas for the purpose of conservation purposes but does identify scenic highways and corridors, hillsides, viewsheds, and ridgelines as important scenic resources (LA County 2015). While there are no designated scenic vistas in the County, the combination of the wide LA Basin, foothills, and mountains allows for long range views of the LA Basin, the coastline, desert, and mountains from a variety of informal viewing locations.

The Draft 2045 CAP would be a policy document that does not include specific projects that could have a direct, adverse effect on scenic vistas. However, projects implementing Draft 2045 CAP measures could alter views of scenic vistas. Impacts could include short-term, temporary visual impacts from construction or long-term impacts if implementing projects were to introduce new forms or buildings with height, forms, or colors that could create contrast with existing conditions. Many of the projects that would implement the Draft 2045 CAP measures would involve retrofitting existing buildings, development along existing transit areas, or infill projects in urban locations that are already developed. These types of projects are not expected to significantly impact views from scenic vistas as they would be located in developed areas, would be likely to blend in with surrounding development, and would not be likely to create changes in visual quality that would be visible from a scenic vista or that would significantly interrupt views available from scenic vistas. Other potential projects promoted by Draft 2045 CAP Strategies could include composting facilities, renewable energy generation facilities, or water recycling facilities which could be located in more rural areas of the County and, depending on the design and location, create a greater level of visual contrast compared with existing conditions.

The Draft 2045 CAP would promote the development of rooftop solar and could incentivize the development of small-scale or utility-scale solar projects. Rooftop photovoltaic panels generally do not significantly alter rooflines or create large features that could be visible from the street level. From elevated viewing locations, rooftop solar panels may be visible. The form of solar panels is likely to blend in with existing rooflines and development. Therefore, the form and line created by rooftop solar panels is not likely to contrast with existing visual conditions to an extent that it would degrade views from scenic vistas. Depending on the angle of the sun, reflection off of solar panels may be visible from elevated locations at certain times of the day. However, solar panels are generally considered less reflective than water, glass, or metals used in residential and commercial construction (Shields 2010). Therefore, the reflection from rooftop solar panels is not likely to create a significant amount of contrast from scenic vistas compared to the reflection from existing development. Both small-scale

and utility-scale solar energy generation projects would be required to comply with the Renewable Energy Ordinance (REO), which regulates ground-mounted solar projects to address community concerns and minimize environmental impacts. The REO requires that any ground-mounted solar project obtain a Minor Conditional Use Permit or Conditional Use Permit. Both permits require that ground-mounted solar be analyzed for negative visual impacts and the potential for the facility to impact the viewshed (LA County Office of the County Counsel, 2016). Compliance with the REO and the enforcement of conditions listed as part of the REO would ensure that the potential for small-scale and utility-scale solar energy generation projects to impact visual resources would be minimized.

Any proposed development would be required to comply with the sections of the County Code, which regulate the appearance and siting of physical developments such as the Hillside Management Areas Ordinance and other portions of the code which regulate modification of scenic resources and the visual quality of new development. Projects requiring a Conditional Use Permit would have to meet development standards of the County Code. Additionally, components of the County Code that relate to the protection of Hillside Management Areas would ensure that the scenic character of ridgelines and hillsides would be preserved. As most of the scenic vistas in LA County are available from hillsides and ridgelines, compliance with the Hillside Management Areas Ordinance would ensure that visual impacts from scenic vistas would be reduced. Projects promoted by the Draft 2045 CAP also would be required to comply with the following policies of the General Plan which are intended to protect visual quality and prevent degradation of scenic vistas:

- Policy C/NR 13.1:** Protect scenic resources through land use regulations that mitigate development impacts.
- Policy C/NR 13.2:** Protect ridgelines from incompatible development that diminishes their scenic value.
- Policy C/NR 13.4:** Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.
- Policy C/NR 13.6:** Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.
- Policy C/NR 13.8:** Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.
- Policy LU 10.2:** Design development adjacent to natural features in a sensitive manner to complement the natural environment.
- Policy LU 10.3** Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.
- Policy LU 10.5:** Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction
- Policy LU 10.10:** Promote architecturally distinctive buildings and focal points at prominent locations, such as major commercial intersections and near transit stations or open spaces.  
Therefore, projects implementing the Draft 2045 CAP measures would be

evaluated for project-level compliance with existing requirements and environmental regulations.

Furthermore, the Draft 2045 CAP includes Measure A1 that encourages the preservation of agricultural and forest lands and Measure A3 that promotes the expansion of the County's tree canopy and green spaces. These policies would preserve existing open spaces which contribute to the visual quality of scenic vistas and would result in a beneficial impact. Additionally, Measure T3 encourages the expansion of bicycle and pedestrian networks which could result in expanding the number and accessibility of publicly accessible scenic vistas, resulting in a beneficial impact.

The compliance of future projects with the General Plan and County Code would reduce the potential impact of future projects on scenic vistas. Additionally, subsequent projects requiring discretionary approval would undergo project-level CEQA review. The potential for any project to cause or contribute to the degradation of scenic vistas would be evaluated through that analysis and mitigation, if necessary, to reduce any significant impacts would be incorporated. As a result of requisite consistency with the General Plan and compliance with local ordinances, potential impacts of the Draft 2045 CAP on scenic vistas are considered less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

**b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?**                       

A wide variety of trail types are found throughout the County, including multiuse trails that are accessible to pedestrians, equestrians, and mountain bikers. The highest concentration of trails in the County existing within the Santa Monica Mountains, near the foothills of the San Gabriel Mountains, and in the eastern areas of the county near Lancaster and Palmdale (LA County 2015).

As described above, the Draft 2045 CAP could promote projects that result in visual changes that are visible from regional trails or scenic vistas. Some of the Draft 2045 CAP strategies such as Strategy 4, Strategy 5, and Strategy 8 would include measures that would require retrofits to existing buildings in order to increase energy efficiency, and reduce water consumption. Measure E2 would encourage the transition of existing buildings to all-electric and RNG and Measure E7 would encourage improving the energy efficiency of existing buildings. These types of building retrofits would not be expected to result in changes to the mass, height, or color of buildings or other changes that could create visual change visible from regional trails. While these types of projects would not result in significant visual impacts, some projects could result in more noticeable visual contrast and changes, especially if projects are located in more rural areas of the County such as solar projects proposed in the Antelope Valley. As evaluated under criterion a), future projects would be required to comply with General Plan policies (identified above) and the County Code, which includes components to protect visual quality and resources such as the Hillside Management Areas Ordinance which protects views accessible from hills and ridgelines. Additionally, as described under criterion a), solar energy generation projects would be required to comply with the REO, which includes conditions to reduce the visual impacts of solar projects and would require that a site-specific analysis of the potential for visual impacts be conducted. Furthermore, future projects would be required to undergo project-specific environmental review which would evaluate the potential for a project to affect views from regional trails and mitigate any significant impacts. For these reasons, impacts of the Draft 2045 CAP on views from regional trails would be less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

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

There are three adopted scenic highways within the Project Area: Angeles Crest Highway Route-2, from 2.7 miles north of I-210 to the San Bernardino County line; Mulholland Highway (two sections), from SR-1 to Kanan Dume Road, and from west of Cornell Road to east of Las Virgenes Road; and Malibu Canyon–Las Virgenes Highway, from SR-1 to Lost Hills Road. There are also eight highways within unincorporated LA County that are eligible for designation (LA County 2015; Caltrans 2021).

As disclosed above, the Draft 2045 CAP could promote projects that would result in visual contrast or changes during the construction of projects or by creating new structures that would create contrast compared to existing visual conditions. These projects could occur near designated scenic highways and could, depending on the location and design of the projects, result in changes to the visual resources visible along a scenic highway such as trees, rock outcroppings or historic buildings. Most projects that would be encouraged by the Draft 2045 CAP would involve modifications to existing buildings or would be located in areas that are already developed and are not as likely to be located near scenic resources such as rock outcroppings or trees. These projects would not be likely to damage scenic resources. Projects that would involve new development have a greater potential to impact scenic resources visible from a scenic highway. However, such projects are likely to be spread out within the County and located in areas that are already urbanized and developed and not located near scenic resources such as rock outcropping or trees. These projects are not likely to be located near significant scenic resources that could be altered by projects implementing the Draft 2045 CAP. Therefore, projects developed to implement the measures of the Draft 2045 CAP are not likely to substantially degrade scenic resources visible from a scenic highway.

Additionally, any future development proposed to implement the measures of the Draft 2045 CAP would be required to comply with policies in the General Plan (identified above), which are intended to protect scenic resources, protect ridgelines and hillsides, prohibit advertising along scenic routes, protect historical resources, and support the preservation of historic buildings. Future projects also would be required to comply with elements of the County Code, including elements to protect visual quality and resources such as the Hillside Management Areas Ordinance (which protects views accessible from hills and ridgelines) and the Mills Act Program (which is designed to protect historical properties). Future projects encouraged by the Draft 2045 CAP would be subject to project-level CEQA review which would evaluate the potential for the project to impact scenic resources visible from a scenic highway and apply mitigation to address significant impacts if necessary. As a result, the Draft 2045 CAP’s impacts on scenic resources visible from a designated scenic highway are considered less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

**d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from a publicly accessible vantage point)**

The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly result in new or expanded development. The

Draft 2045 CAP includes measures that would promote the retrofitting of buildings to include water and energy efficiency upgrades. These types of retrofits and modifications to existing buildings are not expected to create significant changes in visual character that would be visible from publicly accessible locations. The Draft 2045 CAP also includes measures that would incentivize mixed use developments, infill developments along transit-oriented areas, and could encourage the development of projects to reach the water recycling, waste management, and energy goals identified in the Draft 2045 CAP. These projects could include compost processing facilities, renewable energy generation facilities, or water recycling facilities. These projects are likely to be located in developed areas. However, some projects such as solar energy generation projects or composting facilities, could be located in rural areas of the County where the visual contrast created by implementing projects would be greater.

Each of these projects would be required to comply with the County Code, which includes provisions to regulate height limits, setbacks, bulk etc. and apply development standards appropriate to each zone. The County Code also includes specific ordinances to protect the visual quality of hillsides management areas and ridgelines. Future projects would also be required to be consistent with policies of the General Plan intended to protect overall visual quality and scenic resources. Overall, most projects resulting from implementation of the Draft 2045 CAP are expected to be located in areas that feature existing urban development. The introduction of higher density development, mixed uses, incorporation of rooftop solar, adjustment of landscaping to drought tolerant plants etc. are expected to result in small adjustments to community character and visual appearance. Retrofits to existing buildings to incorporate water and energy efficiency measures would likely involve changes to the interior of building structures and would not be visible from publicly accessible viewpoints. The potential for utility-scale or other sized solar energy generation projects to be proposed in more rural areas such as the Antelope Valley would continue to be analyzed on a project-specific basis for purposes of CEQA.

Other future development projects implementing the Draft 2045 CAP measures also would be evaluated on an individual basis once details are known. Individual future development projects supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review and disclose any potential impacts related to aesthetics and provide mitigation of any significant impacts, if necessary. The Draft 2045 CAP does not include specific proposed development, and it would be speculative to guess where any specific future development might be proposed in furtherance of Draft 2045 CAP goals. For the reasons discussed here and in the preceding two paragraphs, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

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

Shade and shadow could be created if buildings or structures block direct sunlight from adjacent properties potentially affecting the users or occupants of adjacent land uses. Shade and shadow can be influenced by the time of day, season, weather, height and bulk of building, spacing, topography and other factors. Shade can result in positive effects such as cooling or can result in negative effects such as the loss of natural light.

The Draft 2045 CAP could result in the development of projects such as mixed use or infill developments, building retrofits, the development of facilities such as composting facilities, water recycling facilities and solar energy generation facilities. Depending on the location and design of these projects, they have the potential to create shade, shadows, daytime glare, and nighttime lighting. Nighttime lighting would mostly be limited to lighting from infill and mixed-use projects. These projects could be located in more urbanized areas developed with considerable existing sources of nighttime lighting. Therefore, nighttime lighting resulting from any such projects would not create a significant contrast compared to existing conditions. The Draft 2045 CAP would

encourage the installation of rooftop solar projects. Rooftop solar would generally be unnoticeable from the ground level; however, reflection created from solar panels could be seen from elevated locations. As described under criterion a), above, photovoltaic panels can result in reflection and glare depending on the time of the day, angle of the sun, etc. However, photovoltaic panels are designed to absorb as much light as possible rather than to reflect light. While the panels can result in some reflection or glare, the glare created by photovoltaic panels is generally considered to be less than that created by water or common building materials such as metal or glass (Shields 2010).

The Draft 2045 CAP could also indirectly incentivize the development of solar facilities in rural areas (such as the Antelope Valley), where they could be more visible from roads, trails and other at-grade elevations. Projects located in the Rural Outdoor Lighting District would be required to comply with development requirements and lighting restrictions intended to protect dark skies in rural areas of the County. Compliance with this component of the Zoning Ordinance would reduce the potential for projects located in rural areas to result in a significant lighting impact. Utility-scale solar projects would be required to comply with the REO (described in more detail under criterion a) and to obtain a Conditional Use Permit. The REO requires that utility-scale solar projects include a glare study that evaluates the potential for a solar project to result in glare. The glare study conducted as part of the Conditional Use Permit process would disclose the potential for a proposed utility-scale solar project incentivized by the Draft 2045 CAP to result in a significant impact relating to glare, and would inform County decision-makers' decision of whether to approve the Conditional Use Permit. Therefore, the potential for glare to result from any utility scale solar projects incentivized by the Draft 2045 CAP would be evaluated as part of the Conditional Use Permit process.

Each development encouraged by the Draft 2045 CAP would be subject to the goals and policies within the General Plan and development standards with the County Code related to reducing the impact of glare, light, and shadows on surrounding land uses. This would ensure that each development would be designed in a manner that would not create significant shadow impacts for surrounding land uses.

Development of potential future projects supported by Draft 2045 CAP measures would be evaluated on an individual basis once details are known. Individual proposals facilities supported by CAP measures would be required to undergo project-level CEQA review and disclose any potential impacts related to light, glare, and shadow and provide mitigation of any significant impacts, if necessary. The Draft 2045 CAP does not include any specific proposed facilities or facility locations and it would be speculative to guess where any specific future development might be proposed in furtherance of Draft 2045 CAP goals. For the reasons discussed here and in the preceding three paragraphs, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

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## 2. AGRICULTURE / FOREST

*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.*

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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**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 checked="" type="checkbox"/>	<input type="checkbox"/>
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There is a relatively small quantity of land area located within Los Angeles County that contains designated farmland. Important farmland in the County is located in Antelope Valley, Santa Clarita Valley, the Santa Monica Mountains, and the San Fernando Valley. Approximately 90 percent of the important farmland in the County is located in Antelope Valley. Within unincorporated areas of the County, there are approximately 26,235 acres of prime farmland, farmland of statewide importance, and unique farmland. There are approximately 6,853 acres of farmland of local importance and 205,193 acres of grazing land (Los Angeles County 2014; DOC 2021). The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly convert designated farmland to non-agricultural use.

However, implementation of Draft 2045 CAP GHG reduction measures that involve ground disturbance could, depending on the location, result in the conversion of farmland to non-agricultural use. For most types of development projects that may be proposed in furtherance of Draft 2045 CAP goals, construction is anticipated to occur primarily within developed areas such as parking lots, improvements to existing structures, and urban areas near public transportation. However, other types of new projects encouraged by Draft 2045 CAP measures could occur in previously undeveloped areas such as facilities to increase waste diversion or renewable energy. Measure E1: Procure Zero-Carbon Electricity and Measure E5: Increase Renewable Energy Production could result in the development of photovoltaic solar or other renewable energy generation facilities in undeveloped areas, which development could result in the conversion of farmland to a non-agricultural use. However, when proposals for renewable energy generation facilities are submitted, the County directs would-be developers of such projects to areas that previously have been disturbed (e.g., sites where farming may no longer be viable due to factors such as access to water) and away from actively farmed sites. Further, consistency with General Plan policies included in the Conservation and Natural Resources Element have been adopted to protect agricultural lands would further reduce the likelihood that solar energy-related or other development would result in the conversion of farmland to a non-agricultural use. See, for example, General Plan Policies C/NR 8.1, 8.2 and 8.3 in furtherance of Goal C/NR 8, which protects productive farmland for local food production, open space, public health, and the local economy. (County of Los Angeles 2015) Therefore, conversion of a significant amount of CEQA-defined

Farmland is not likely due to the small amount of designated farmland in the unincorporated areas of the County, discouragement of proposals that could result in such conversion, and the fact that conversion of designated farmland would conflict with General Plan policies and a GHG reduction measure proposed as part of the Draft 2045 CAP (described below). Impacts are considered to be less than significant.

Development of potential future projects supported by Draft 2045 CAP measures would be evaluated on an individual basis once details are known. Individual proposals for renewable energy generation facilities or other facilities supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review to disclose potential significant impacts, if any, related to the conversion of designated farmland and to mitigate any such significant impacts, if feasible. Therefore, this consideration will not be evaluated further in the EIR.

**b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?**

Title 22 (Zoning Code) Chapter 22.16 (Agricultural, Open Space, Resort and Recreation, and Watershed Zones) establishes the Light Agricultural Zone (A-1) and Heavy Agricultural Zone (A-2) which allow for a comprehensive range of agricultural uses in areas particularly suited for agricultural activities. As described within Section 22.16.100 (Purpose), permitted uses are intended to encourage agricultural activities and other such uses required for, or desired by, the inhabitants of the community. An area so zoned may provide the land necessary to permit low-density single-family residential development, outdoor recreational uses, and public and institutional facilities. For example, some older suburban communities particularly in the East San Gabriel Valley maintain agricultural zoning. Existing communities like these could potentially be located in proximity to high quality transit areas (HQTAs) and, as such, may experience rezoning as a part of community plan updates to implement the Housing Element. Nonetheless, any such rezoning would result from Housing Element implementation, not from implementation of the Draft 2045 CAP.

The Zoning Code implements the General Plan policies via detailed development regulations. The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions. The Draft 2045 CAP would not propose changes to the General Plan Land Use Designations that could in turn require changes to zoning nor does it include specific projects that could conflict with existing zoning. Further, the Draft 2045 CAP includes Measure A1: Conserve Agricultural and Working Lands, Forest Lands and Wildlands to help preserve existing agricultural lands. Conserving and restoring agricultural and forest lands keeps carbon in the ground and provides a multitude of benefits from maintaining biodiversity in Significant Ecological Areas (SEA) to preserving the character of the unincorporated County's rural areas. Draft 2045 CAP Action A1.1 calls for the creation of agricultural easements to preserve agricultural lands, working lands, rangelands, and forestlands. Draft 2045 CAP Action A1.1 would create an agricultural easement program; create necessary ordinance to support the preservation of these lands; identify areas for easements; and develop plan for creating easements. Therefore, adoption of the Draft 2045 CAP would not directly or indirectly conflict with Agricultural Zoning as a result of future energy, housing, or other projects proposed in furtherance of the Draft 2045 CAP.

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners in order to restrict specific parcels of land to agricultural or related open space use. The only Williamson Act contracts in effect in Los Angeles County are for land on Santa Catalina Island (LA County 2015). The Draft 2045 CAP includes Measure A1 to help conserve agricultural lands which would be consistent with the purpose of the Williamson Act to restrict specific parcels of land to agricultural or related open space use. Therefore, no direct impacts related to conflicts with Williamson Act contracts would result with adoption of the Draft 2045 CAP. Indirect impacts resulting from

solar energy generation, housing, or other projects that could be proposed in the future in furtherance of the Draft 2045 CAP also would not be expected to result in conflicts with Williamson Act contracts because of the small amount of land in the unincorporated areas of the County that are or could be subject to a Williamson Act contract, the County’s discouragement of proposals that could result in impacts to productive agricultural lands, and the fact that such conflicts would not be consistent with General Plan policies promoting Goal C/NR 8, which protects productive farmland for local food production, open space, public health, and the local economy.

For the reasons discussed above, potential impacts relating to conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract would be less than significant. Therefore, this consideration will not be evaluated further in the EIR.

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

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” (Public Resources Code § 12220[g]). 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” (Public Resources Code § 4526).

The Angeles National Forest and the Los Padres National Forest encompass approximately 650,000 acres of land within unincorporated Los Angeles County. These forests occupy a large portion of Los Angeles County and support oak woodlands, black walnut, grey pine, and other native tree species (Los Angeles County 2014; California Wilderness Coalition 2020; DOC 2021). For example, 11 of California’s 20 species of native oaks are found in the Los Padres National Forest, including blue oak, valley oak, and California black oak; California shrub oak species, including leather oak and Nuttall’s (“coastal”) scrub oak also are found in the Los Padres National Forest (Los Padres ForestWatch, Inc. 2013).

The Draft 2045 CAP would not propose changes to the General Plan Land Use Designations and includes Measure A1 to conserve forestlands. Further, as a general matter, forest land would not be suitable for the implementation of actions in furtherance of the Draft 2045 CAP. For example, solar energy generation requires access to sun; forested areas do not provide that resource and would not be deforested to serve a solar energy generation use (which itself would be counter to another Draft 2045 CAP implementing action). Additionally, private in-holdings within the forests have a large number of owners, with each not necessarily owning large contiguous parcels that would be conducive to development of solar energy generation. The County has no existing zoning specific to forest use or timberland, and does not have land use authority to approve development proposed in national forests like the Angeles National Forest and the Los Padres National Forest. Instead, the U.S. Forest Service, which provides land use oversight in those locations, may authorize uses in national forests that benefit the general public and protect public and natural resources values. The construction of new private residences in national forest lands is prohibited by Forest Reserve Act of 1891, and Forest Service land usually is not made available if the overall needs of an individual project proponent or business can be met on nonfederal lands (U.S. Forest Service 2013). The County is not aware of any applications for the development of a solar energy generation project on Angeles National Forest or

Los Padres National Forest lands and whether or not the U.S. Forest Service would allow such development in the future is speculative. Therefore, the Draft 2045 CAP would not cause a significant impact relating to conflicts with existing zoning of timberland or forest land.

Individual proposals for renewable energy generation facilities or other facilities supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review, and to disclose and mitigate any potential significant impacts related to the conversion of forest or timberland. This includes project compliance with Draft 2045 CAP Measure A1 (if approved) to conserve forest lands. Therefore, for the reasons discussed in the preceding two paragraphs, this consideration will not be evaluated further in the EIR.

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

The Draft 2045 CAP does not propose changes to the General Plan Land Use Designations and includes Measure A1 to conserve forestlands. As described above under criterion c) forest land located in unincorporated areas of the County (i.e., in the Angeles National Forest and Los Padres National Forest) would not directly be affected by adoption of the Draft 2045 CAP and would not likely be developed in the future with projects proposed in furtherance of Draft 2045 CAP goals. Additionally, the GHG reduction measures proposed as part of the Draft 2045 CAP that could result in construction impacts would be focused primarily in urbanized areas of the unincorporated County and so would be unlikely to impact forest land. The Antelope Valley is not urbanized, and solar energy generation facilities are common there. Consistent with past practice, additional solar energy generation projects could be proposed in the Antelope Valley. However, because resources meeting the definition of forest land (Public Resources Code § 12220[g]) are not located there, potential future solar energy generation projects that may be proposed in the Antelope Valley in furtherance of Draft 2045 CAP goals would not cause a significant impact in this regard. Additionally, as described above, Draft 2045 CAP Measure A1 is intended to conserve agricultural and working lands, forest lands and wildlands. Therefore, impacts would be less than significant.

Individual proposals for projects supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review, and to disclose and mitigate any potential significant impacts related to the conversion of forest land. This includes project compliance with Draft 2045 CAP measure A1 to conserve forest lands. Therefore, for the reasons discussed in the preceding paragraph, this consideration will not be evaluated further in the EIR.

**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?**                                                                               

The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use designations with the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly convert designated farmland to non-agricultural use or convert forest land to non-forest use. In general, construction associated with Draft 2045 CAP measures is anticipated to occur primarily within existing developed areas. As discussed in the context of criterion d), potential future solar energy generation projects could be proposed in the Antelope Valley, but would not cause a potential significant impact associated with the conversion of forest land. The Draft 2045 CAP proposes measures that support the efficient use of urban land, transit-oriented projects, renewable energy use, and facilities to increase waste diversion among others. The Draft 2045 CAP also includes Measure A1 to conserve agricultural and working lands, forest lands and wildlands. Therefore, potential impacts related to the conversion of designated farmland or forest land would be less than significant.

Individual proposals for projects supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review, and to disclose and mitigate any potential significant impacts related to the conversion of farmlands and/or forestland. The Draft 2045 CAP does not include any specific proposed facilities or facility locations and it would be speculative to guess where any such developments would be proposed or located. Therefore, for these reasons and those summarized in preceding paragraphs, this consideration will not be evaluated further in the EIR.

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### 3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>Would the project:</b>				
<b>a) Conflict with or obstruct implementation of applicable air quality plans of either the Antelope Valley AQMD (AVAQMD) or the South Coast AQMD (SCAQMD)?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The AVAQMD and SCAQMD, together with the Southern California Association of Governments (SCAG), are responsible for formulating and implementing air pollution control strategies throughout the County. The AVAQMD is responsible for regulating stationary sources of air pollution in the northern desert portion of the County, while the SCAQMD is responsible for regulating stationary sources of air pollution in the non-desert portion of the County. The AVAQMD 2017 Federal 75 ppb Ozone Attainment Plan includes planning assumptions regarding population, vehicle activity and industrial activity that addresses ozone precursor-producing activities within the AVAQMD to demonstrate attainment of the 75 parts per billion Federal 8-hour ozone standard by July 2027. The SCAQMD 2016 Air Quality Management Plan (AQMP) contains measures to meet the Federal 24-hour standards for particulate matter less than 2.5 microns in diameter (PM 2.5) by 2019, annual PM2.5 standards by 2025, and 1-hour ozone (O3) standards by 2022.

The Draft 2045 CAP would be a policy document, the approval of which would not directly result in the construction or operation of new land uses that may be developed within the County and would not result in direct conflicts with the AQMP. However, indirect impacts associated with implementation of proposed Strategies, Measures, and Actions could result. Indirect pollutant emissions resulting from the construction and operation of future development within the County under the Draft 2045 CAP would also have the potential to affect implementation of the AQMP. Therefore, this topic will be analyzed further in the EIR.

<b>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?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Los Angeles County is characterized by relatively poor air quality. State and Federal air quality standards often are exceeded in portions of the County. The County currently is designated as non-attainment of Federal and/or State air quality standards for O<sub>3</sub>, particulate matter less than 10 microns in diameter (PM 10), and for PM 2.5. The Draft 2045 CAP would result in increased indirect air emissions associated with implementation of proposed Strategies, Measures, and Actions. As such, implementation of the Draft 2045 CAP could have the potential to contribute to cumulatively significant air quality impacts in combination with other existing and future emission sources in the Project area. Indirect pollutant emissions resulting from the construction and operation of future development within the County under the Draft 2045 CAP also would have the potential to affect implementation of the AQMP. Therefore, this topic will be analyzed further in the EIR.

**c) Expose sensitive receptors to substantial pollutant concentrations?**                       

Sensitive receptors include children, elderly people, people with asthma, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. Existing sensitive receptor locations in the County include, but are not limited to, residential communities, schools and school yards, day care centers, parks and playgrounds, hospitals and medical facilities. Implementation of the Draft 2045 CAP could increase air emissions above current levels, including potentially toxic air contaminants (TACs), thereby potentially affecting nearby sensitive receptors. Therefore, this topic will be analyzed further in the EIR.

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

Other emissions, such as those leading to odors, typically are associated with industrial developments involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors also are associated with such uses as sewage treatment facilities and landfills. The Draft 2045 CAP would be a policy document, the approval of which would not directly result in the generation of other emissions, such as those leading to odors. Indirect pollutant emissions, such as odorous emissions, could result from the construction and operation of future development within the County under the Draft 2045 CAP. Common sources of odors from development within a community may include the use of volatile organic compound (VOC)-containing architectural coatings and solvents, municipal solid waste collection areas, and transfer stations and material recovery facility operations. The AVAQMD and SCAQMD have adopted rules for controlling nuisance emissions, such as those leading to odors, from community sources. AVAQMD Rule 402 and SCAQMD Rule 402 both prohibit emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. The AVAQMD and SCAQMD both regulate the VOC content of architectural coatings and solvents via several adopted rules including Rules 442, 1107, 1113 and 1171, as numbered by both air districts. The SCAQMD, which has jurisdiction over an area with a substantially greater population density than the AVAQMD, has adopted additional source-specific rules that assist in controlling odors including Rule 410 for controlling odors from transfer stations and material recovery facilities and Rule 1138 for controlling emissions from restaurant cooking operations. While the AVAQMD has no rules identical to SCAQMD Rules 410 and 1138, potential odorous emissions would still be subject to the overall nuisance requirements in Rule 402. Future development within the County under the Draft 2045 CAP would be required to comply with all applicable regulatory requirements for controlling emissions such as those leading to odors. Furthermore, the Draft 2045 CAP would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and no changes to land use designations are proposed. Thus, the Draft 2045 CAP would not increase exposure of people to other emissions such as those leading to odors, and would not have the potential to generate odors that affect a substantial number of people. Impacts from adoption of the Draft 2045 CAP would be less than significant and this issue will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

#### 4. BIOLOGICAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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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 (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Species and habitats identified by CDFW as candidate, sensitive, or special status that may be present in unincorporated areas of the County include, for example, Swainson’s hawk (*Buteo swainsoni*). Species and habitats identified by USFWS that may be present include, for example, arroyo toad (*Anaxyrus californicus*). There is a potential for any of these species or their habitats to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county-wide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environments and on disturbed areas with existing infrastructure. These include a majority of the CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use (Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19). The implementation of Draft 2045 CAP measures would create a safer bikeway network (Measure T6), would promote shade for pedestrians to support alternative modes of transportation (Measures T15 and T17), support the preservation of restored forest lands (Measure A1), and increasing urban forests (Measure A2, Measure A3), which would reduce pressures on vacant and undeveloped land.

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes, electric vehicle (EV) chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction could result in impacts to candidate, sensitive, or special status species, or their habitats. Future individual projects to implement the measures proposed in the Draft 2045 CAP would undergo site-specific review and CEQA analysis to analyze and mitigate potential significant impacts to candidate, sensitive, or special status species and their habitats. Further, implementation of individual projects implementing Draft 2045 CAP measures would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding candidate, sensitive, or special status species. Impacts to candidate, sensitive, or special status species are considered to be potentially significant and will be further evaluated in the EIR.



**b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?**

Sensitive natural communities present in unincorporated LA County include southern riparian forest and juniper woodland. There is a potential for any of these sensitive natural communities to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environments and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use (Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19).

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes, EV chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction could result in impacts to sensitive natural communities. Future individual projects to implement the measures proposed in the Draft 2045 CAP would undergo site specific review and CEQA review to analyze and mitigate potential significant impacts to sensitive natural communities. Further, the individual projects implementing Draft 2045 CAP measures also would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding sensitive natural communities. Impacts to sensitive natural communities are considered to be potentially significant and will be further evaluated in the EIR.

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

Protected wetlands are present in unincorporated areas of the County. For example, marshes may be found in San Fernando Valley, vernal pools may be found in Simi Valley, and coastal wetlands may be found in Topanga Lagoon and Arroyo Sequit. There is a potential for any of these species or corridors to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environment and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use

(Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19).

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes, EV chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction could result in impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. Future individual projects to implement the 2045 CAP Draft 2045 CAP would undergo site specific review and CEQA analysis to identify and mitigate potential significant impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. Further, implementation of individual projects implementing Draft 2045 CAP measures also would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. For example, individual projects implementing Draft 2045 CAP measures would be subject to the Migratory Bird Treaty Act, which prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. Impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites are considered to be potentially significant and will be further evaluated in the EIR.

**e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?**

Oak woodlands may be found in unincorporated areas of the county including, but not limited to, the Santa Monica Mountains and areas around the Angeles National Forest. Other unique native woodlands (such as juniper and southern California black walnut) also may be found there. Joshua woodland can be found in northern Los Angeles County throughout the Antelope Valley. There is a potential for any of these unique native woodlands to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environment and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use (Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19). The Draft 2045 CAP measures would support the preservation of restored forest lands (Measure A1), and increase urban forests (Measure A2, Measure A3) which would protect existing oak woodland and other unique woodlands as well as increase canopy cover such as oak woodland within the County.

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes,

EV chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction could result in impacts to oak woodlands or other unique native woodlands. Future individual projects implementing Draft 2045 CAP measures also would be subject to policies included in the General Plan, as well as other state and federal laws and regulations regarding conversion of oak woodlands or other unique native woodlands, such as the state's Oak Woodlands Protection Act, which prohibits a person from removing from an oak woodland (as defined) or specified oak trees, unless an oak removal plan and oak removal permit application for the oak tree removal has been submitted to and approved by the Director of Fish and Wildlife. The County administers the Oak Woodlands Plan and other biological resource protection ordinances which similarly prohibits a person from removing or converting native woodlands unless a discretionary permit application has been submitted to and approved by the Director of Regional Planning. Potential impacts relating to the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174) are analyzed below. Impacts to oak woodlands or other unique native woodlands are considered to be potentially significant and will be further evaluated in the EIR.

**f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?**

Wildflower Reserve Areas are found, but not limited to, the areas in northern Los Angeles County within the Antelope Valley. Significant Ecological Areas (SEA) can be found throughout Los Angeles County. Oaks are widely dispersed throughout the County. Coastal Resource Areas can only be found in three areas (Santa Catalina Island, Marina Del Rey, and Santa Monica Mountain Coastal Zone). There is a potential for Wildflower Reserve Areas, SEAs, oaks, or Coastal Resource Areas to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a County-wide policy document intended to reduce GHG emissions. It would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. Individual projects implementing the Draft 2045 CAP measures are anticipated to be located primarily within the urban environment and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use (Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19).

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes, EV chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction would be required to comply with local

policies or ordinances, such as the General Plan and the County’s Zoning Code, protecting biological resources, such as SEAs and oak trees. Note that the County’s Renewable Energy Ordinance prohibits ground-mounted utility-scale solar facilities in SEAs. Future individual projects to implement the measures proposed in the Draft 2045 CAP would undergo site specific review and CEQA analysis to identify and mitigate potential significant impacts relating to consistency with applicable policies and ordinances protecting biological resources, where avoidance is not attainable. Future individual projects implementing Draft 2045 CAP measures also would be subject to policies included in the General Plan, as well as other local, state, and federal regulations. Impacts to biological resources protected under local policies and ordinances are considered to be less than significant through the County’s discretionary approval for compliance with local ordinances, and this issue will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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

There are currently no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved state, regional, or local habitat conservation plans in effect in unincorporated Los Angeles County. Therefore, no impact would occur. This consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

## 5. CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP is a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2021 Housing Element. As a policy document, the Draft 2045 CAP itself would not result in direct impacts to historical resources. However, future projects implementing GHG reduction measures contained in the Draft 2045 CAP could involve structural improvements and/or ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of historical resources. For example, such changes could result from construction of new solar s, electric vehicle (EV) charging infrastructure (Measure T6), photovoltaic systems (Measure E5), creating a more connected bikeway network (Measure T3), and also tree planting to expand the County’s Tree Canopy (Measure A3). Future projects would be required to comply with existing federal, State, and local regulations that protect historical resources and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects could nonetheless result in significant impacts to historic architectural resources and/or archaeological resources qualifying as historical resources. Impacts to historical resources are considered to be potentially significant and will be further evaluated in the EIR.

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

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions. the 2021-2029 Housing Element. As a policy document, the Draft 2045 CAP itself would not result in direct impacts to unique archaeological resources. However, future projects to implement some GHG reduction measures contained in the Draft 2045 CAP could involve ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of unique archaeological resources. Future projects would be required to comply with existing federal, State, and local regulations that protect historical resources and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects could nonetheless result in significant impacts to unique archaeological resources. Impacts to unique archaeological resources are considered to be potentially significant and will be further evaluated in the EIR.

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



Paleontological resources are the fossilized remains of plants and animals, including vertebrates (animals with backbones; mammals, birds, fish, etc.), invertebrates (animals without backbones; starfish, clams, coral, etc.), and microscopic plants and animals (microfossils), and can include mineralized body parts, body impressions, or footprints and burrows. They are valuable, non-renewable, scientific resources used to document the existence of extinct life forms and to reconstruct the environments in which they lived. A significant impact would occur if a project would destroy a unique paleontological resource or site, or a unique geologic feature.

In its “Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources,” the Society of Vertebrate Paleontology (SVP) defines four categories of paleontological potential for rock units: high, low, undetermined, and no potential: **High Potential**, rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources; **Low Potential**, rock units that are poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule; **Undetermined Potential**, rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment; and **No Potential**, rock units like high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites) that will not preserve fossil resources (SVP, 2010). It is important to note that while paleontological potential as defined above can provide a rough idea of whether subsurface fossils may exist, the uniqueness or significance of a fossil locality is unknown until it is identified to a reasonably precise level (Scott and Springer, 2003). Therefore, any fossil discovery should be treated as potentially unique or significant until determined otherwise by a professional paleontologist.

As indicated by geologic mapping, the surficial geology within the planning area is varied, with a majority of the deposits composed of Holocene, Pleistocene, Pliocene, and Miocene-age sedimentary deposits. Additionally, there are occurrences of Cretaceous, Jurassic, and Triassic-age metamorphic and igneous rocks associated with the San Gabriel and Eastern Santa Monica mountains in the planning area. For areas that are mapped as having Holocene-age deposits at the surface, there may be older, Pleistocene-age deposits at unknown depths within the subsurface (Yerkes & Campbell, 2005).

Among the Pliocene and Miocene-age deposits in the planning area, geologic mapping indicates that deposits associated with the Los Angeles Basin (i.e., San Pedro, Inglewood, Puente, and Fernando formations, and the Topanga Group) are present at the surface, and assumingly, in the subsurface (Yerkes & Campbell, 2005).

### Paleontological Sensitivity

Records that are available through the University of California Museum of Paleontology (UCMP) online fossil localities database indicate numerous fossil localities within Los Angeles County. Among the available records, there are 77 vertebrate, 1767 invertebrate, 108 plant, and 271 microfossil localities, several from the deposits that occur in the planning area (UCMP, 2021a).

In general, Holocene-age alluvial deposits are considered to have a low potential to contain significant paleontological resources, based on the recent age of the deposits (SVP, 2010); late Holocene-age deposits (i.e., younger than 5,000 radiocarbon years) have a particularly low potential. Deposits that date to the middle Holocene (i.e., older than 5,000 radiocarbon years) have a potential that increases as the depth into the deposits increases. In general, Pleistocene-age sedimentary deposits are considered to have a high potential to contain significant paleontological resources, as is evident by the numerous fossil discoveries throughout

California (UCMP, 2021; Sub Terra Consulting, 2017)—as well as within Los Angeles County (UCMP, 2021a). The exact transition from Holocene- to Pleistocene-age deposits is not known in the planning area. In summary, the surficial Holocene-age alluvial deposits are considered to have a low potential to contain significant paleontological resources, with the potential increasing to high within the deeper layers of the unit; any Pleistocene-age deposits encountered in the subsurface are considered to have a high potential to encounter significant paleontological resources. Additionally, due to the previous fossil discoveries from within the Pliocene and Miocene-age deposits (UCMP, 2021b) from the County, the formations from this age range would be considered to have a high potential to contain significant paleontological resources as well.

Construction associated with the implementation of most GHG reduction measures could result in ground-disturbing activities that could have the potential to damage or destroy a unique paleontological resource or site or unique geologic feature. However, the specific locations of future projects are not known. Therefore, the specific resources present within a project footprint of construction sites cannot be determined. Factors necessary to identify specific impacts include the design and footprint of a project, and the type and precise location of construction activities. Project-level impacts would be addressed in future site-specific environmental analysis conducted by the County at the time such projects are proposed. Because there could be the potential for adverse changes to paleontological resources due to the construction and operations of future projects, this impact would be potentially significant. Impacts to paleontological resources are considered to be potentially significant and will be further evaluated in the EIR.

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

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions. As a policy document, the Draft 2045 CAP itself would not result in disturbance of human remains. However, future projects to implement some GHG reduction measures contained in the Draft 2045 CAP would involve ground disturbing activities that could, depending on their location, result in disturbance of human remains interred outside of a dedicated cemetery. Impacts to human remains are considered to be potentially significant and will be further evaluated in the EIR.

## 6. ENERGY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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**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"/>
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The Draft 2045 CAP provides an approach to the reduction of GHG emissions and associated co-benefits of reducing energy demand from community activities, including future development under the General Plan. Potential energy reductions provided by proposed Strategies, Measures, and Actions include increases in renewable energy production and improvement of energy efficiency.

The Draft 2045 CAP would be a policy document containing GHG emissions reduction measures and implementation actions to reduce GHG emissions. It does not propose any specific development or other physical changes to the environment and would not facilitate growth beyond what the General Plan would allow. To promote energy conservation, the County has adopted an amended California Green Building Standards Code per Title 31 (Green Building Standards) of the County Code. Therefore, any construction associated with projects undertaken to implement the Draft 2045 CAP would be required to be designed to comply with the performance levels of the California Green Building Standard Code, as amended in Title 31. Likewise, all such projects would be required to comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24) and the green building standards in Part 11 of Title 24.

Furthermore, the purpose and intended effect of the Draft 2045 CAP is to reduce GHG emissions generated in unincorporated areas of the County to help reduce the effects of climate change, including those emissions generated by energy demand and supply. The Draft 2045 CAP includes strategies, with corresponding implementation measures and actions, that would reduce energy use in buildings and decarbonizing the energy that is used, reduce indoor and outdoor water consumption through ordinances, tiered billing structures, education and outreach and/or promotion of conservation programs, and increasing the supply of energy to communities with zero-carbon or low-carbon electricity through a number of means including solar power generation, distributed or decentralized power generation, energy storage and microgrids, strategic partnerships with the Clean Power Alliance of Southern California and other actions. Specifically, the Draft 2045 CAP aims to reduce electricity use through increasing the efficiency of existing buildings (Measure E7), increasing the use of recycled water which would reduce electricity associated with water conveyance and distribution (Measure E8), and reducing indoor and outdoor water use (Measure E9). Further the Draft 2045 CAP would promote adoption of renewable energy production in both new and existing residential and commercial development (Measure E5), which would decrease grid energy demand and advance the County towards its electrification and zero net energy goals (Measure E3), all of which would support the State's energy efficiency and renewable energy goals.

The Draft 2045 CAP would also include strategies, with corresponding implementation measures and actions, that would reduce vehicle miles traveled, emissions and transportation fuel consumption. The CAP includes transportation strategies, measures and actions that would reduce fuel consumption such as locating



development within High Quality Transit Areas, emphasizing non-motorized travel through the County's Pedestrian Action Plan, Bicycle Master Plan, Active Transportation Plans, and Vision Zero Action Plan and expanding the electric vehicle charging infrastructure, partnering with transit agencies to electrify County bus and shuttle fleets. For example, the Draft 2045 CAP aims to electrify 100 percent of its bus fleet by 2030 (Measure T7), in line with Metro's goal of electrification for its fleet. This would reduce diesel, gasoline, and natural gas consumption from buses and would have the co-benefit of reducing air pollutant and greenhouse gas emissions. Similarly, the Draft 2045 CAP would aim to electrify passenger and heavy-duty vehicles in line with the State's Mobile Source Strategy (Measure T6 and T8), which would reduce diesel, gasoline, and natural gas consumption of vehicles in support of State goals. The Draft 2045 CAPs waste measures (Measure W1 through W3) also would result in greater waste diversion from landfills and decreased waste generation per capita resulting in less fuel consumption from haul trucks to landfills and would generate energy through waste-to-energy conversion systems.

For these reasons, the Draft 2045 CAP would result in no impact regarding wasteful, inefficient, or unnecessary consumption of energy resources. and impacts would be less than significant. Because no impact would result, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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

For the reasons explained in the context of criterion a), the Draft 2045 CAP would not cause an impact relating to a conflict with or obstruction of a state or local plan for renewable energy or energy efficiency. Because no impact would result, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

## 7. GEOLOGY AND SOILS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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 active fault trace? Refer to Division of Mines and Geology Special Publication 42.**

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) prohibits the development of structures for human occupancy across Holocene-active<sup>2</sup> fault traces. Under this Act, the California Geological Survey (CGS) has established “Zones of Required Investigation” on either side of an active fault that delimits areas susceptible to surface fault rupture. The zones are referred to as Earthquake Fault Zones (EFZs) and are shown on official maps published by the CGS (CGS 2021). Surface rupture occurs when the ground surface is broken due to a fault movement during an earthquake; typically, these types of hazards occur within 50 feet of an active fault.

The California Earthquake Hazards Zone Application (EQ Zapp) is an interactive map available on CGS’s website. The EQ Zapp allows users to view all available earthquake hazard zone data, including earthquake fault, liquefaction, and earthquake-induced landslide zones. According to the EQ Zapp, there are eight EFZs that cross through portions of unincorporated Los Angeles County including the East Montebello, Hollywood, Newport-Inglewood-Rose Canyon, San Andreas, San Gabriel, Santa Monica, Sierra Madre, and Raymond fault zones (CGS 2021).

The Draft 2045 CAP would be a policy document for unincorporated County that does not include the development of specific habitable structures that could be directly impacted by known EFZs. However, projects implementing Draft 2045 CAP measures would require project-specific evaluation once details are known. New projects encouraged by the Draft 2045 CAP measures could include habitable structures within or adjacent to EFZs. However, the construction of any new structure and improvements to certain existing structures in California is subject to the standards and requirements included in the most current versions of the California Building Code (CBC) and the County of Los Angeles Building Code (which is derived from the CBC). In general, the CBC requires that every newly constructed structure (habitable or not) be subject to a geotechnical review (usually a preliminary and final review). The CBC further requires that a fault study be included in the geotechnical review of any new development that is proposed near an active fault.

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<sup>2</sup> Holocene-active faults are faults that have shown evidence of movement within the Holocene Epoch (11,700 years – present)

All new developments would be constructed in accordance with all applicable state and local laws (e.g., Alquist-Priolo Act, CBC, and the County Building Code). EFZs would be identified during the planning process for any new project, and avoided when deciding on the location of new habitable structures. Adherence to project-specific geotechnical recommendations and applicable state and local laws would ensure that any adverse effects due to the presence of a known EFZ would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**ii) Strong seismic ground shaking?**

The County is located in an historically seismically active region of California, as is evident by the presence of several Holocene-active faults in the area. The 2014 Working Group on California Earthquake Probabilities<sup>3</sup> (WGCEP) concluded that there is a 50 percent probability (approximate) that a magnitude ( $M_w$ ) 6.7 earthquake or higher could occur in the Los Angeles region before the year 2044<sup>4</sup>, and a 53 percent chance of a  $M_w$  6.7 (or higher) earthquake within the southern portion of the San Andreas fault zone before the year 2044 (Field et al., 2015). As discussed above, there are several faults that transect unincorporated Los Angeles County. The presence of these faults suggests that unincorporated Los Angeles County may be subjected to strong seismic ground shaking in the event of an earthquake in the region.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide wide GHG emissions and would support development allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Implementation of these strategies, measures and actions would not directly affect the potential to expose people or structures to adverse effects resulting from geologic hazards such as earthquakes.

Projects implementing Draft 2045 CAP measures would be subject to all relevant federal, state, and local regulations and building standards, including the CBC and the and County of Los Angeles Building Code. Compliance with applicable building codes would ensure that each new development has undergone a project-specific geotechnical review prior to issuance of permits, whereby project-specific geotechnical hazards would be identified and the specific design criteria would be incorporated into individual project design plans. Geotechnical design criteria are incorporated to ensure structures can withstand potential ground shaking from regional fault sources. Compliance with project-specific geotechnical design recommendations and all applicable building code standards and requirements would ensure that projects implementing Draft 2045 CAP measures would not cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**iii) Seismic-related ground failure, including liquefaction and lateral spreading?**

Liquefaction is a phenomenon in which unconsolidated, water saturated sediments become unstable due to the effects of strong seismic shaking. During an earthquake, these sediments can behave like a liquid, potentially causing severe damage to overlying structures. Lateral spreading is a variety of minor landslide that occurs when unconsolidated liquefiable material breaks and spreads due to the effects of gravity, usually down gentle slopes. Liquefaction-induced lateral spreading has been defined as the finite, lateral displacement of

3 Also referred to as WGCEP 2014, this is a working group comprised of seismologists from the U.S. Geological Survey (USGS), California Geological Survey (CGS), Southern California Earthquake Center (SCEC), and California Earthquake Authority (CEA).

4 The probabilities generated by the WGCEP reflect the probability of an earthquake to occur within a given fault zone or geographic location, within 30 years of when the study was executed. The year 2014 was used as a starting point for the 30-year projection; the year 2044 is 30 years after 2014.

gently sloping ground as a result of pore-pressure buildup or liquefaction in a shallow underlying deposit during an earthquake (Rauch 1997). The occurrence of this phenomenon is dependent on many complex factors, including the intensity and duration of ground shaking, particle-size distribution, and density of the soil. In general, a relatively high potential for liquefaction exists in loose, sandy soils that are within 50 feet of the ground surface and are saturated (below the groundwater table).

The potential damaging effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of structure slabs due to sand boiling, and buckling of deep foundations due to ground settlement. Dynamic settlement (i.e., pronounced consolidation and settlement from seismic shaking) may also occur in loose, dry sands above the water table, resulting in settlement of and possible damage to overlying structures. Lateral spreading can move blocks of soil, placing strain on buried pipelines that can lead to leaks or pipe failure.

According to the EQ Zapp, there are several areas of concern regarding liquefaction potential in unincorporated areas of the County (CGS 2021). The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Projects implementing Draft 2045 CAP measures could be subject to the effects of liquefaction and/or lateral spreading if they are proposed in susceptible areas, thereby exposing people and structures to the potentially damaging effects of liquefaction and/or lateral spreading. Earthquake-induced liquefaction or lateral spreading could occur in the unincorporated County, resulting in potential damage new structures and the public, which could cause various structural damage, service interruptions, and potential injury. However, projects implementing Draft 2045 CAP measures would be subject to all relevant federal, state, and local regulations and building standards, including the CBC and the and County of Los Angeles Building Code. Compliance with these standards and codes would ensure that each new development has undergone a project-specific geotechnical review prior to issuance of grading permits, whereby project-specific geotechnical hazards would be identified and the specific design criteria would be incorporated into individual project design plans. Geotechnical design criteria and proper soil engineering procedures would be incorporated to ensure problematic soils are accounted for and structures are able to withstand potential damage due to liquefaction and/or lateral spreading.

Compliance with project-specific geotechnical design recommendations and all applicable building code standards and requirements would ensure projects implementing Draft 2045 CAP measures would not cause substantial adverse effects, including the risk of loss, injury, or death involving strong liquefaction and/or lateral spreading. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**iv) Landslides?**

Landslides are one of the various types of downslope movements (mass wasting) in which rock, soil, and other debris are displaced due to the effects of gravity. The potential for material to detach and move down slope depends on multiple factors including the type of material, water content, and steepness of terrain.

According to the EQ Zapp, there are several areas that have the potential for earthquake-induced landslides in the unincorporated County (CGS 2021). The Draft 2045 CAP would be a policy document intended to reduce County-wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Projects implementing Draft 2045 CAP measures would be subject to the effects of earthquake-induced landslides if they are proposed in susceptible areas, thereby exposing people and structures to the potentially damaging effects of landslides. Earthquake-induced landslides could occur in the unincorporated County, resulting in potential damage new

structures and the public, which could cause various structural damage, service interruptions, and potential injury.

However, as discussed above, all new developments are obligated by state and local laws to comply with the CBC and County of Los Angeles Building Code. Compliance with the applicable standards and codes would ensure that each new development has undergone a project-specific geotechnical review prior to issuance of grading permits, whereby project-specific geotechnical hazards would be identified and the specific design criteria would be incorporated into individual project design plans. Geotechnical design criteria would be incorporated into geotechnical reviews to verify the stability of nearby slopes and soils, and to provide recommendations to protect developments from causing or being affected by landslides.

Compliance with project-specific geotechnical design recommendations and all applicable building code standards and requirements would ensure that new developments in support of Draft 2045 CAP measures would not cause substantial adverse effects, including the risk of loss, injury, or death involving strong liquefaction and/or lateral spreading. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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

The Draft 2045 CAP would be a policy document intended to reduce County-wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Construction projects implementing Draft 2045 CAP measures could include earth-moving activities that could increase the risk of erosion or sediment transport, such as clearing, excavation, grading, trenching, or soil stockpiling. Implementation of Draft 2045 CAP measures could create a significant impact relating to erosion or sediment transport if construction activities associated with multiple new developments implementing Draft 2045 CAP measures went unregulated.

However, sufficient independently enforceable laws, regulations, plans, and standards are in place to assure that the potential impact would be less than significant. To combat erosion and sedimentation caused by earth-moving activities, new developments that would disturb one or more acres are subject to the provisions of the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities Order 2012-0006-DWQ (Construction General Permit). For projects that disturb less than one acre, but are part of a larger common plan of development that in total disturbs one or more acres, would also be regulated under this permit. Projects that would disturb less than one acre would be regulated under the Los Angeles County Municipal Separate Storm Water System (MS4) Permit. These state requirements were developed to ensure that erosion from construction site is controlled and monitored. The Construction General Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which requires implementation of Best Management Practices (BMPs) to control stormwater run-on and runoff from construction work sites. BMPs may include, but would not be limited to, physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures to be identified by a qualified SWPPP developer that would substantially reduce or prevent erosion from occurring during construction. Similar to building code compliance, the Construction General Permit is a state requirement; all new developments that may be proposed by individual projects implementing Draft 2045 CAP measures would be subject to this requirement. Therefore, this impact would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**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?**

As discussed above, EQ Zapp indicates that there are several areas within the unincorporated County that are susceptible to earthquake-induced liquefaction, lateral spreading, and landslides. Additionally, according to the interactive map depicting areas of land subsidence in California, provided on the United States Geological Survey (USGS) website, there are areas within the unincorporated County that show evidence of land subsidence due to groundwater withdrawal (USGS 2021). New developments supporting Draft 2045 CAP measures could include projects that require dewatering during construction. Dewatering is a common technique used during construction to lower the water table when excavations are planned to be deeper than the existing water table. Dewatering involves the removal or draining of groundwater via various pumping methods. If excessive dewatering occurs as a result of individual projects supporting Draft 2045 CAP measures, it could exacerbate land subsidence in the region.

As discussed above, all new developments are obligated by state and local laws to comply with the CBC and County of Los Angeles Building Code. Compliance with the applicable building codes would ensure that each new development has undergone a project-specific geotechnical review prior to issuance of grading permits, whereby project-specific geotechnical hazards would be identified and the specific design criteria would be incorporated into individual project design plans. Geotechnical design criteria are incorporated into geotechnical reviews to verify the stability of nearby slopes and soils, and to provide recommendations to protect developments from causing or being affected by liquefaction, lateral spreading, landslides, and subsidence. Compliance with project-specific geotechnical design recommendations and all applicable building code standards and requirements would ensure that projects implementing the Draft 2045 CAP measures would not cause substantial adverse effects, including the risk of loss, injury, or death involving strong liquefaction, lateral spreading, landslides, and subsidence. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994)<sup>5</sup>, creating substantial direct or indirect risks to life or property?**

Expansive soils are soils that possess a “shrink-swell” characteristic. Shrink-swell is the cyclic change in volume (expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying; the volume change is reported as a percent change for the whole soil. This property is measured using the coefficient of linear extensibility (COLE) (NRCS 2017). The Natural Resources Conservation Service (NRCS) relies on linear extensibility measurements to determine the shrink-swell potential of soils. If the linear extensibility percent is more than 3 percent (COLE=0.03), shrinking and swelling may cause damage to building, roads, and other structures (NRCS 2017). NRCS Web Soil Survey data indicates that the soils within unincorporated areas of the County have highly variable linear extensibility ratings with percentages ranging from 1.5 to 6.5, indicating linear extensibility ratings ranging from low to high (NRCS 2021a). New projects implementing CAP measures could be constructed on expansive soils.

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<sup>5</sup> The CBC, based on the International Building Code and the now defunct Uniform Building Code, no longer includes a Table 18-1-B. Instead, Section 1803.5.3 of the CBC describes the criteria for analyzing expansive soils.

However, sufficient independently enforceable laws, regulations, plans, and standards are in place to assure that the potential impact would be less than significant. The CBC requires geotechnical reviews to include soil testing, which identify the presence of a variety of geotechnical constraints related to soil quality, including the expansion potential of the soil. As discussed above, all new developments proposed in the unincorporated County would be subject to the standards and requirements included in the California and County building codes. Additionally, each new project implementing Draft 2045 CAP measures would be subject to individual project review. Project-specific reviews would identify any potential geotechnical hazards (such as the presence of expansive soils) and each project would adhere to the specific geotechnical requirements, as required by law. Compliance with state and local laws governing new development in the unincorporated County would ensure impacts related to expansive soils would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?**                       

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Implementation of future development supported by the Draft 2045 CAP measures may generate waste water. Individual projects that include structures may connect to existing sewer lines, on-site septic tanks, and/or alternative waste water disposal systems (rare). In the event that a septic tank or alternative waste water disposal system installation is proposed, there is a testing a permitting process that would be completed prior to installation based on individual project-level review.

The Web Soil Survey provides septic tank absorption field data to inform developers of the suitability of soil for supporting the use of septic tanks and other alternative wastewater treatments systems. Web Soil Survey data suggests that the suitability of the soils in the unincorporated County varies from not limited to very limited and may have one or more features that are unfavorable to septic tank usage (NRCS 2021b). Any new development that would include the utilization of a septic tank or alternative waste water disposal system would be regulated by the Los Angeles County Department of Public Health (LACDPH) and the Land Use Program of the Environmental Health Division.

Home and business property owners that want to install or replace an onsite wastewater treatment system (OWTS) must submit an application and the required documents listed on the application in order to go through the OWTS review process. Obtaining a permit would be required prior to the construction of any septic tank or alternative waste water disposal system, and each system would be constructed within the parameters of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (SWRCB 2012). System design approvals may be submitted to the County Building and Safety Department prior to obtaining building permits for proposed projects.

As this procedure would be required prior to construction of any and all septic tanks and alternative wastewater disposal systems, all new projects implementing Draft 2045 CAP measures would be subject to these state and local requirements. Proper soils are essential for installation and maintenance of septic tank and alternative waste water disposal systems; compliance with these state and local requirements would ensure that impacts related to adequate soils for supporting such systems would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?**

The Hillside Management Area (HMA) Ordinance is a component of the County’s General Plan and is designed to preserve significant natural features in hillside areas. HMAs are defined as areas with natural slopes of 25 percent or greater. Compliance with the Hillside Design Guidelines is required for development in HMAs, unless exempted under the HMA Ordinance’s provisions. In hillside areas with less than 25 percent slope, use of the Hillside Design Guidelines is optional but encouraged. These guidelines include specific and measurable design techniques that can be applied to residential, commercial, industrial, and other types of projects to ensure natural features in hillside areas are preserved.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Implementation of future activities supported by the Draft 2045 CAP measures could occur within HMA designated areas. If so, the new development would be regulated under the HMA Ordinance and subject to the Hillside Design Guidelines on a project specific basis. Requisite compliance with the ordinance would assure that new projects implementing Draft 2045 CAP measures would not result in a significant impact. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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## 8. GREENHOUSE GAS EMISSIONS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>Would the project:</b>				
<b>a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Draft 2045 CAP would provide an approach to the reduction of GHG emissions from community activities, including future development under the General Plan. The Draft 2045 CAP, if adopted, would establish County-wide GHG reduction targets of: 25 percent below 2015 levels by 2025; 40 percent below 2015 levels by 2030; 50 percent below 2015 levels by 2035; and carbon neutrality<sup>6</sup> by 2045. While significant impacts are not anticipated, potential GHG emissions reductions provided by proposed Strategies, Measures, and Actions and consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions will nonetheless be further evaluated in the EIR.

<b>b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The potential for implementation of the Draft 2045 CAP to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs will be evaluated further in the EIR. Applicable plans, policies, or regulations that will be evaluated in the EIR include the 2017 Climate Change Scoping Plan, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, the Renewables Portfolio Standard (Senate Bill 1078 and subsequent amendments in Senate Bill 100), and the California Building Energy Efficiency Standards and Green Building Code (Title 24, Parts 6 and 11). While the Draft 2045 CAP would be designed to be consistent with state and local GHG reduction plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases, and significant impacts are not anticipated, the EIR analysis will nevertheless analyze the potential for conflicts.

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<sup>6</sup> Carbon neutrality means “net zero” emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of carbon dioxide that is stored, both in natural sinks and through mechanical sequestration.

## 9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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**Would the project:**

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Future construction activities associated with projects implementing Draft 2045 CAP measures could involve the use of standard construction equipment and materials, which would include the following commonly used materials and substances: fuel, oils and lubricants, hydraulic fluid, paints and thinners, and cleaning solvents to maintain vehicles and motorized equipment. Routine use of any of these substances could pose a hazard to people or the environment and, unless handled in accordance with regulatory requirements, could cause a potential significant impact.

There are numerous laws and regulations that regulate the transportation, handling, storage, and disposal of hazardous materials. The Health and Safety Code and the California Code of Regulations require preparation of a Hazardous Materials Business Plan/Spill Prevention Control and Countermeasures Plan (HMBP/SPCC) when conditions have been determined to warrant regulation and, when required, that they be prepared prior to construction. HMBPs include best management practices (BMPs) for the transport, storage, use, and disposal of hazardous materials and waste. HMBPs also include information regarding construction activities, worker training procedures, and hazardous materials inventory procedures.

Any fuel tanks required for a project implementing the Draft 2045 CAP would be maintained and operated according to all local, state, and federal regulations during construction and operation, and hazardous material storage would be detailed in a SPCC Plan. Refueling and general maintenance for construction equipment, such as changing fluids and lubricating parts, also would be subject to sufficient containment capabilities and according to measures outlined in an SPCC Plan.

During construction of projects implementing Draft 2045 CAP measures, waste disposal and collection receptacles would be located on-site to ensure proper disposal of hazardous materials in accordance with regulatory requirements. Additionally, construction activity would be subject to the Construction General Permit and its required SWPPP, which include BMPs to control potentially contaminated run-off from construction sites.

Compliance with applicable federal, state, and local laws and regulations would ensure that any impact resulting from projects implementing 2045 CAP measures would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. As discussed above, the adoption of the Draft 2045 CAP could lead to new developments in support of 2045 CAP measures. During the construction of projects implementing Draft 2045 CAP measures, construction activities may involve the transportation, storage, use, or disposal of a variety of hazardous materials, including batteries, hydraulic fluid, diesel fuel, gasoline, grease, lubricants, paints, solvents, and adhesives. Additionally, if future developments are affected by the presence of known hazardous materials sites, the removal and handling of hazardous wastes could lead to an accidental release. If during the course of development, hazardous materials were accidentally released into the environment, a potential significant impact could result.

As previously noted, there are numerous laws and regulations that regulate the transportation, handling, storage, and disposal of hazardous materials. The required HMBP and SPCC Plan discussed above would include procedures that would help prevent the accidental release of hazardous materials into the environment. A standard HMBP and SPCC Plan would include BMPs as well as spill control and spill response measures to ensure any potential release would be handled appropriately. In the event that a spill did occur, the SPCC would include appropriate measures to ensure that workers cease work activities to contain any release and enact the protocols for cleanup including the notification of appropriate agencies and the use of materials stored onsite such as absorbent pads to minimize the spread or exposure.

Accidents or mechanical failure involving heavy equipment could result in the accidental release of fuel, lubricants, hydraulic fluid, or other hazardous substances. These types of spills on construction sites are typically in small quantities, localized, and cleaned up in a timely manner. Construction contractors are contractually responsible for their hazardous materials and are required under their contract to properly store and dispose of these materials in compliance with state and federal laws, including implementing a HMBP/SPCC. As discussed, projects implementing CAP measures would require coverage under the Construction General Permit (or related stormwater permit), and so would be subject to the protections included in a SWPPP, which would outline BMPs to contain a potential release and to prevent any such release from reaching an adjacent waterway or stormwater collection system (e.g., erosion control, sediment control, and waste management). As the location of future development is not known at the time of this analysis, it is not known whether new developments would be proposed on or near known hazardous materials sites.

If a future development is planned on or near a known hazardous materials site, then previously or currently contaminated soil or groundwater may be encountered during construction activities (e.g., grading, excavation, utility installation, soil remediation, etc.), and could result in a significant impact. To account for this potential, Mitigation Measure HAZ-1 shall be included in any future environmental document that will be prepared during subsequent project-specific evaluations, in compliance with CEQA.

Compliance with applicable federal, state, and local laws and regulations and the applicable BMPs and HMBP/SPCC plan, ensure that any impact resulting from projects implementing Draft 2045 CAP measures would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?**                       

Some populations (e.g., children, elderly, sick or disabled persons) are more susceptible to health effects of hazardous materials than the general population. Hazardous materials used near schools, day care centers, senior living communities, hospitals, etc., must consider potential health effects to these populations, often referred to as “sensitive receptors.” Construction or redevelopment on contaminated properties that could potentially generate vapors or fugitive dust containing contaminants may potentially pose a health risk to these populations. In addition, commercial businesses in proximity to sensitive receptors may have hazardous emissions or handle hazardous or acutely hazardous materials or wastes that could pose a health risk to these sensitive receptors.

As discussed in Section 3, *Air Quality*, there are several sensitive receptors and receptor locations within the unincorporated County, and it is not known at the time of this analysis whether projects implementing Draft 2045 CAP measures would be constructed in proximity to one or more of them. Typically, developments that would handle hazardous materials or discharge hazardous emissions within one-quarter mile of a sensitive receptor are at risk of exposing sensitive receptors to hazardous materials and emissions. While the Draft 2045 CAP adoption would not directly cause hazardous emissions, it would encourage new developments that could create hazardous emissions. Impacts generated by the release of hazardous emissions in proximity to sensitive receptors would occur during construction phases and would be temporary.

To protect sensitive receptors, Section 17210 et seq. of the State Education Code, Sections 21151.2 and 21151.4, and 21151.8 of the Public Resources Code require that prospective school sites be reviewed to determine that such sites are not a current or former hazardous waste disposal site, a hazardous substance release site, or the site of hazardous substance pipelines. These laws also require consultation with local hazardous materials agencies and air quality districts to ensure that sites within one-quarter mile of a school that handle or emit hazardous substances would not potentially endanger sensitive receptors.

The other federal, state, and local laws and regulations that regulate hazardous materials, discussed above in criteria a) and b) and in criterion d) below, also would be applied to any activities involving handling hazardous materials or releasing hazardous emissions within one-quarter mile of a sensitive receptor. Compliance with the applicable federal, state, and local laws and regulations would ensure any potential impacts to sensitive receptors would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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

The provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” require the DTSC to compile and maintain a list of Hazardous Waste and Substances sites, including SWRCB leaking underground storage tank (LUST) Sites, active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO), and certain solid waste disposal sites and hazardous waste facilities. As discussed in the context of criterion a), above, there are several hazardous materials sites within the unincorporated County, many of which are included on the Cortese List. If new developments implementing Draft 2045 CAP measures are

proposed on or near hazardous materials sites that have been included on the Cortese List, then the risk of creating a significant hazard to the public or environment increases, as potentially contaminated soil and/or groundwater could be exposed during ground-disturbing activities. A potential significant impact would occur if new development implementing Draft 2045 CAP measures on or near a site listed on the Cortese List exposed hazardous materials to people or the environment.

The previously discussed laws governing the use, transportation, storage, and disposal of hazardous materials would apply to developments proposed on or near Cortese List sites. In addition, sites listed on the Cortese List are under the jurisdiction of a regulatory agency (e.g., Department of Toxic Substances Control [DTSC] or Regional Water Quality Control Board [RWQCB] or a local agency), hence the reason for their inclusion on the Cortese List. As such, the overseeing regulatory agency is in the process of requiring the owners/operators of listed sites to bring their sites into compliance. This includes requiring sites with spills or releases to soil and/or groundwater to investigate and clean up their sites to levels that no longer pose risks to people or the environment. The listings on the Cortese List are public records. At the time when a specific project is implemented, the current status of nearby sites on the Cortese list can be checked and the project planned accordingly to comply with the overseeing regulatory agency requirements, if any. Compliance with applicable federal, state, and local laws and regulations would ensure that any potential impacts would be considered less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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?

According to the County’s General Plan and the Los Angeles County Airport Land Use Plan (ALUP), there are 14 airports within the County (Los Angeles County ALUC, 2004), all of which would be within two miles of at least a portion of the unincorporated County. The airports in the County are as follows:

- Agua Dulce Airport
- Compton/Woodley Airport
- Hawthorne Municipal Airport
- Hollywood Burbank Airport
- El Monte Airport
- Long Beach Municipal Airport
- Los Angeles International Airport
- Palmdale Regional Airport
- Santa Monica Municipal Airport
- Van Nuys Airport Burbank Airport
- Whiteman Airport
- Brackett Field
- Zamperini Field
- General Williams J. Fox Airfield

The Draft 2045 CAP would be a policy document intended to reduce unincorporated wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. As the Draft 2045 CAP could result in new projects implementing Draft 2045 CAP measures within the unincorporated County, adoption of the Draft 2045 CAP could result in new developments being located within a delineated safety or noise hazard zone and could result in a safety hazard or excessive noise for people residing or working in the area.

The Federal Aviation Administration (FAA) identifies and regulates potential impacts related to air traffic and related safety hazards. The FAA’s Federal Aviation Regulation (FAR) at 14 CFR Part 77 establishes standards and notification requirements for objects affecting navigable airspace. These potential impacts are regulated at the federal level; as such, all new developments that may be proposed within any airport safety or noise hazard zones, or that would include components that may cause a safety hazard, would be obligated to comply with FAA regulations. Additionally, any development proposed in a delineated safety or noise hazard zone (as provided by the County ALUP) would be required to comply with any requirements included in the County ALUP. Through compliance with FAA regulation and the County ALUP guidelines, potential impacts resulting from the adoption of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The 2019 County of Los Angeles All-Hazards Mitigation Plan does not include specific evacuation routes to be used in the event of an emergency (County of Los Angeles 2019). However, the County’s General Plan includes a map of freeway and highway Disaster Routes, many of which cross through portions of the unincorporated County (Los Angeles County 2015). Depending on the nature of projects implementing Draft 2045 CAP measures, they may require construction in major roadways or the closure of major roadways to facilitate construction activities. If construction activities within major roadways or road closures were required to facilitate projects implementing Draft 2045 CAP measures, then activities could obstruct major roadways and could hinder evacuation procedures.

Although the locations and details of potential projects implementing Draft 2045 CAP measures are not known at the time of this analysis, such projects would be subject to individual project review pursuant to the grading or building permit application process. If, based on such review, it is determined that a specific project could conflict with an emergency response or evacuation plan, then a project-specific traffic control plan would be required to avoid such conflicts. Because any potential impacts to the implementation of an emergency response or evacuation plan would be identified and addressed before a related impact could occur, the impacts associated with implementation of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located: (i) within a high fire hazard area with inadequate access; (ii) within an area with inadequate water and pressure to meet fire flow standards; (iii) within proximity to**

**land uses that have the potential for dangerous fire hazard; or (iv) would constitute a potentially dangerous fire hazard.**

According to fire hazard mapping by the California Department of Forestry and Fire Protection (CAL FIRE), as part of the Fire and Resource Assessment Program (FRAP), there are several areas of the unincorporated County that are classified as Very High Fire Hazard Severity Zones (VHFHSZ) (CAL FIRE 2012). The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. If new projects implementing Draft 2045 CAP measures would involve construction activities, then the use of construction equipment and the possible temporary on-site storage of fuels and/or other flammable construction chemicals could pose an increased fire risk resulting in injury to workers or the public during construction. However, contractors would be required to comply with hazardous materials storage and fire protection regulations, which would minimize potential for fire creation.

Further, a detailed site-specific, project-specific fire risk analysis would occur for any proposed new development that would be subject to a project-specific CEQA analysis. If it is determined during the CEQA process that the implementing project would be constructed within or adjacent to a VHFHSZ, or future project activities would exacerbate an existing fire risk, then mitigation measures would be proposed at the time to address the potential fire risk. In addition to any project-specific fire-related mitigation recommendations, any new development within Los Angeles County (included the unincorporated areas) would be subject to Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance with the County Fire Code would also ensure developments that are within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques.

Given that any project that would result from the adoption of the Draft 2045 CAP would address fire risks at the time of development, and that any future development would be required to comply with the County Fire Code, the impacts as a result of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**References**

- California Department of Forestry and Fire Protection (CAL FIRE), 2011. Fire Hazard Severity Zones in Local Responsibility Areas (LRA). Forest Resource Assessment Program. Map. Scale 1:150,000.
- Los Angeles County, 2015. Los Angeles County General Plan 2035. Chapter 12, Safety Element. Disaster Routes.
- County of Los Angeles, 2019. 2019 County of Los Angeles All-Hazards Mitigation Plan.
- Department of Toxic Substances Control (DTSC), 2021. EnviroStor database. Hazardous materials sites in Los Angeles County.
- Los Angeles County Airport Land Use Commission (ALUC), 2004. Los Angeles County Airport Land Use Plan.

State Water Resources Control Board (SWRCB), 2021. GeoTracker database. Hazardous materials sites in Los Angeles County.



## 10. HYDROLOGY AND WATER QUALITY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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*Less than Significant Impact.* The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP would not include measures or actions that would degrade surface or groundwater quality or violate any water quality standards or waste discharge requirements. However, projects implementing Draft 2045 CAP measures, depending on the nature of future developments, could include activities that may create an impact to surface or groundwater quality.

Projects implementing Draft 2045 CAP measures within the unincorporated County would be required to comply with independently enforceable requirements of the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities Order 2012-0006-DWQ (Construction General Permit) and the Los Angeles County Municipal Separate Storm Water System (MS4) Permit. Compliance with the provisions of these permits would ensure that construction activities would not create a significant adverse impact to water quality. In addition, new projects would be required to undergo a project-specific CEQA analysis, during which any potential impact to water quality would be identified and addressed during the planning process. Therefore, implementation of the Draft 2045 CAP would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. As a result, impacts would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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 checked="" type="checkbox"/>	<input type="checkbox"/>
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As discussed above, the Draft 2045 CAP would not directly impact water resources, including groundwater resources. While the adoption of the Draft 2045 CAP would not directly impact groundwater supplies or groundwater recharge, it could encourage new projects implementing Draft 2045 CAP measures in unincorporated areas of the County. Depending on the nature of future developments, they could include activities that may impact groundwater supplies and groundwater recharge. However, the Draft 2045 CAP would include a number of actions to increase the use of alternate water sources and reduce water consumption.

While the Draft 2045 CAP may promote development that may require water for construction and operation, these developments would be required to comply with the Draft 2045 CAP measures that require net zero water in new development and significant reductions in indoor and outdoor water use for municipal,

commercial, and industrial development. Therefore, overall, the strategies and measures proposed in the Draft 2045 CAP would result in reductions in water demand. While the Draft 2045 CAP may result in the development of facilities that would require water for construction and operation, these developments would be required to comply with the adopted Draft 2045 CAP; therefore, would be required to be net zero water and would not result in additional water demand. Therefore, the Draft 2045 CAP would have a beneficial impact with regard to water supply, impacts would be less than significant and these considerations will not be evaluated further in the EIR.

**c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; 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, amount, or depth 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 which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?**                       

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The adoption of the Draft 2045 CAP would not directly cause alterations to drainage patterns through alteration of the course of a stream or river, or through the addition of impervious surfaces. It is possible, however, that future projects implementing Draft 2045 CAP measures would include activities that could contribute to the alteration of an existing drainage pattern of a site. The General Plan Safety Element includes goals and policies that would discourage development within delineated flood hazard zones; the Safety Element is currently undergoing an update and it expected that similar or more stringent goals and policies will be included. Compliance with the existing and newly adopted goals and policies would ensure that impacts would be less than significant, and this potential impact will not be evaluated further in the EIR.

**d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?**                       

The adoption of the Draft 2045 CAP would not place structures within a flood hazard or floodplain area. The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. However, it is not known at the time of this analysis whether the adoption

of the Draft 2045 CAP would encourage new developments within a flood hazard or floodplain area. However, as discussed above, the existing General Plan goals and policies discourage new development in flood hazard or floodplain areas. Compliance with the goals and policies included in the General Plan would ensure impacts would be less than significant, and potential impacts will not be evaluated further in the EIR.

**e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?**                       

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. New projects implementing Draft 2045 CAP measures would be evaluated independent of the Draft 2045 CAP for compliance with the Los Angeles County Low Impact Development (LID) Ordinance.

New developments within the unincorporated County also could be subject to the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities Order 2012-0006-DWQ (Construction General Permit) and the Los Angeles County Municipal Separate Storm Water System (MS4) Permit. Compliance with the provisions of these permits would ensure that construction activities would further assure project consistency with the County LID Ordinance. Requisite compliance with the independently enforceable requirements of the LID Ordinance would assure that adoption and implementation of the Draft 2045 CAP would result in no impact relating to this criterion. Accordingly, this criterion will not be evaluated further in the EIR.

**f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?**                       

*Less than Significant Impact.* The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Potential future projects implementing Draft 2045 CAP measures may connect to existing sewer lines, on-site septic tanks, and/or alternative waste water disposal systems (rare). In the event that a septic tank or alternative waste water disposal system installation is proposed, a testing and permitting process would need to be completed prior to installation.

The Web Soil Survey provides septic tank absorption field data to inform developers of the suitability of soil for supporting the use of septic tanks and other alternative wastewater treatments systems. Web Soil Survey data suggests that the suitability of the soils in the unincorporated County varies not limited to very limited and may have one or more features that are unfavorable to septic tank usage (NRCS 2021). Any new development that would include the utilization of a septic tank or alternative waste water disposal system, would be regulated by the Los Angeles County Department of Public Health (LACDPH) and the Land Use Program of the Environmental Health Division.

Home and business property owners that want to install or replace an onsite wastewater treatment system (OWTS) must submit an application and the required documents listed on the application in order to go

through the OWTS review process. Obtaining a permit would be required prior to the construction of any septic tank or alternative waste water disposal system, and each system would be constructed within the parameters of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (SWRCB 2012). System design approvals may be submitted to the County Building and Safety Department prior to obtaining building permits for proposed projects.

As this procedure would be required prior to construction of any and all septic tanks and alternative waste water disposal systems, all new developments would be subject to these state and local requirements. Proper soils are essential for installation and maintenance of septic tank and alternative waste water disposal systems; requisite compliance with these independently enforceable state and local requirements would ensure that adoption and implementation of the Draft 2045 CAP would have no impact related to this criterion. Accordingly, this criterion will not be evaluated further in the EIR.

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

Adopting the Draft 2045 CAP would not directly result in an increased risk of release of pollutants due to inundation by a flood, tsunami, or seiche. According to the General Plan, there are several areas that have been mapped as a flood hazard zones and the entire County coastline is considered a tsunami hazard area (Los Angeles County 2015a; Los Angeles County 2015b). The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element.

Although adoption of the Draft 2045 CAP would not directly result in the release of pollutants, it is possible that future projects implementing Draft 2045 CAP measures could be located in or near a flood or tsunami hazard zone. However, it is not known at the time of this analysis whether the adoption of the Draft 2045 CAP would encourage new developments that would release pollutants due to inundation in flood hazard, tsunami, or seiche zones. If future developments subject to a discretionary agency approval are proposed in areas of flood or tsunami risk, then project-specific CEQA analyses would be required. However, as discussed above, the existing General Plan goals and policies discourage new development in flood hazard or floodplain areas. Compliance with the goals and policies included in the General Plan would ensure impacts would be less than significant. This consideration will not be evaluated further in the EIR.

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

Adoption of the Draft 2045 CAP would not directly affect the beneficial uses of surface waters governed in the basin plan or involve direct extraction of groundwater.

The Los Angeles Regional Water Quality Control Board describes its water quality control plan as follows: “Los Angeles Regional Board’s Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the Basin Plan.” The

Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties is available online (Los Angeles RWQCB 2021).

The Sustainable Groundwater Management Act (SGMA), which became law in 2014, created a new structure for local groundwater management by local agencies through groundwater sustainability agencies (GSAs) toward achieving sustainable groundwater management within 20 years. The formation of GSAs for all basins that have been designated as high- and medium-priority groundwater basins was required by July 1, 2017. Each GSA for these high- and medium-priority basins must then develop a groundwater sustainability plan (GSP) that details how sustainable groundwater management will be achieved within 20 years of implementing the GSP. The GSP is a tool used to help the GSA sustainably manage the basin. The Department of Regional Planning represents the County of Los Angeles on two GSAs: Santa Clarita Valley GSA and Santa Monica Basin GSA.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. It is possible that future projects would be developed as part of furthering the goals of the Draft 2045 CAP, and that such projects could include activities that may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. However, any future projects would be subject to the independently enforceable requirements of the of the basin plan and SGMA. This requisite compliance would assure that the Draft 2045 CAP would have no impact relative to this criterion. Accordingly, this criterion will not be evaluated further in the EIR.

## **References**

County of Los Angeles, 2015a. Los Angeles County General Plan 2035. Chapter 12, Safety Element. Tsunami Hazard Area.

County of Los Angeles, 2015b. Los Angeles County General Plan 2035. Chapter 12, Safety Element. Flood Hazard Zones.

Los Angeles RWQCB, 2020. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. Available online: [https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/basin\\_plan\\_documentation.html](https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html). Page updated May 18, 2020.

Natural Resources Conservation Service (NRCS), 2021. Web Soil Survey. Septic Tank Absorption Fields—Contra Costa County, California. Map. Scale 1:24,500.

State Water Resources Control Board (SWRCB), 2012. Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Water Treatment Systems. June 19, 2012.

**11. LAND USE AND PLANNING**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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**Would the project:**

**a) Physically divide an established community?**                                                                               

The Draft 2045 CAP would be a policy level document that does not include site-specific projects or proposals that could physically divide an established community. The Draft 2045 CAP would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and future activities supported by the Draft 2045 CAP are anticipated to be located primarily within established communities. Therefore, the Draft 2045 CAP would have no direct impacts.

The projects implementing Draft 2045 CAP strategies would generally improve connections between and within communities. Examples of measures proposed in the Draft 2045 CAP that would encourage infill development to increase density to the extent allowed in the General Plan near high quality transit areas are Measures T1 and T2. Development of transit, bicycle transit and pedestrian routes would be encouraged by Measures T3 and T4. Draft 2045 CAP Measures E1, E5, E8, and W1 could promote the construction of facilities such as solar generation, water recycling, or waste management facilities. Implementation of these types of projects would be subject to project level review and are typically designed to connect to the communities they are anticipated to serve. No changes to General Plan land use designations are proposed as part of the Draft 2045 CAP. Therefore, adoption of the Draft 2045 CAP would result in no impacts relating to the potential to divide an established community. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

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

The Draft 2045 CAP would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and no changes to land use designations are proposed. The CAP is part of the Air Quality Element of the General Plan and adoption of the Draft 2045 CAP would replace the CCAP and require a General Plan Amendment. While significant impacts are not anticipated, this issue will nonetheless be further evaluated in the EIR to provide a more detailed analysis of the Draft 2045 CAP's consistency with existing land use plans and zoning. Most notably, the analysis will evaluate the CAP's consistency with the General Plan, its respective elements (including the 2021-2029 Housing Element), and SCAG's 2020-2045 RTP/SCS (Connect SoCal).

**c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?**                                                                               

The Draft 2045 CAP would be a policy level document that would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and no changes to land

use designations are proposed. The potential for the Project to conflict with policies related to Hillside Management Areas are analyzed in Section 7, Geology and Soils, under criterion f). As described in Section 7, no impact would result. The potential for the Project to conflict with policies related to the management of Significant Ecological Areas is addressed in Section 4, Biological Resources, under criterion f). As indicated in that section, the possibility that the Draft 2045 CAP could conflict with the goals and policies of the General Plan related to SEAs would be less than significant and this will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

## 12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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**Would the project:**

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <b>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The General Plan includes a map of designated Mineral Resource Zones (MRZs) locations within the County (County of Los Angeles 2015). The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Projects implementing Draft 2045 CAP measures could be proposed in the area of a known mineral resource that would be of value to the region and the residents of the state and, as a result, could result in the loss of availability to such resources. However, the Conservation and Natural Resources Element of the General Plan includes goals and policies that are designed to protect significant mineral resources and to ensure that new developments proposed in designated MRZs are not lost or destroyed. Additionally, the Surface Mining and Reclamation Act of 1975 (SMARA) regulates surface mining operations to assure that adverse environmental impacts are minimized, and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the state’s mineral resources.

As compliance with SMARA and the General Plan goals and policies protecting mineral resources would be required prior to construction of any new developments in MRZs, all new projects implementing Draft 2045 CAP measures would be subject to these state and local requirements. Compliance with these state and local requirements would ensure that adoption of the Draft 2045 CAP would not result in the loss of availability of known mineral resources. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <b>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?</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

For the reasons discussed in the context of criterion a), adoption and implementation of projects in furtherance of the Draft 2045 CAP could result in a potential significant impact related to this criterion. However, as discussed in criterion a), any new developments encouraged by adoption of the Draft 2045 CAP would be subject to existing goals and policies included in the General Plan, as well as the SMARA. Accordingly, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

### References

Los Angeles County, 2015. Los Angeles County General Plan 2035. Chapter 9, Conservation and Natural Resources Element. Mineral Resources Zones.



### 13. NOISE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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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 County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?**

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------	--------------------------	--------------------------

The Draft 2045 CAP identifies Strategies, Measures, and Actions to provide an approach for the reduction of GHG emissions from community activities, including future development under the General Plan. While the Draft 2045 CAP would not directly result in development, implementation of the CAP could indirectly result in construction and operation of future development what would increase noise levels in unincorporated areas of the County. During construction associated with future development, the potential would exist for temporary or periodic increases in noise levels and/or ground-borne noise and vibration levels on and adjacent to project sites. This potential significant impact will be analyzed further in the EIR.

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

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------	--------------------------	--------------------------

The Draft 2045 CAP identifies Strategies, Measures, and Actions to provide an approach for the reduction of GHG emissions from community activities, including future development under the General Plan. While the Draft 2045 CAP would not directly result in development, implementation of the CAP could indirectly result in temporary construction activities of future development that could increase groundborne vibration or groundborne noise levels in unincorporated areas of the County. This potential significant impact will be analyzed further in the EIR.

**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 checked="" type="checkbox"/>	<input type="checkbox"/>
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Los Angeles County includes a large number of public- and private-use airports that contribute to the noise environment, including in unincorporated areas of the County. Adoption of the Draft 2045 CAP would not directly result in development within plan areas of Airport Land Use Compatibility Plans (ALUCPs). Implementation of the CAP could indirectly result in development within ALUCPs, including the comprehensive Los Angeles County ALUCP and the ALUCP for the General William J. Fox Airfield. However, independent of the Draft 2045 CAP, future development would be required to be consistent with any applicable ALUCP constraints. Furthermore, compliance with policies included in the Land Use Element

and Noise Element of the General Plan related to land use compatibility would ensure that future development would not conflict with ALUPs. In particular, General Plan Policy LU 7.6 explicitly requires consistency that airport land use plans address conflicts between airport operations and surrounding land uses. Policy N 1.12 requires that land use decisions on parcels adjacent to transportation facilities, including those adjacent to airports, consider existing and future noise levels of the adjacent transportation facilities. Requisite compliance with independently enforceable obligations of ALUPs and the General Plan would ensure that the Draft 2045 CAP would result in a less than significant impact relative to the potential exposure of people residing or working in unincorporated areas of the County to excessive airport or airstrip noise. Accordingly, this criterion will not be evaluated further in the EIR.

## 14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

- 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)?**
- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
|  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Draft 2045 CAP would support development allowed under the General Plan land use assumptions with the 2021-2021 Housing Element. The Draft 2045 CAP would be a policy level document that does not include site-specific projects or proposals that could directly induce population growth. Projects implementing Draft 2045 CAP policies are anticipated to primarily be located within the urban environment and in disturbed areas with existing infrastructure. The Draft 2045 CAP includes Measure T1 to encourage density near high-quality transit areas and Measure T2 to develop land use plans addressing jobs/housing balance and increased mixed use to the extent allowed by the General Plan. No changes to General Plan land use designations are proposed. Therefore, the Draft 2045 CAP would not result in an unanticipated increase in density or population growth outside of what was accounted for in the General Plan with the 2021-2029 Housing Element. Therefore, impacts would be less than significant, and this issue will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

- b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?**
- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
|  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Implementation of the measures in the Draft 2045 CAP would involve retrofitting existing building or requiring new developments incorporate water conservation systems, energy efficiency upgrades, and sustainable waste management upgrades. These retrofits and upgrades for new developments are not anticipated to displace existing housing or people. Some of the CAP strategies could promote the construction of larger projects such as solar facilities, water recycling facilities, and waste management facilities. These types of facilities are typically sited away from existing residential areas and would not be likely to displace existing housing. Projects implementing Draft 2045 CAP measures would be evaluated for project level compliance with existing regulations and environmental requirements once details are known. Draft 2045 CAP Impacts would be less than significant and will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

## 15. PUBLIC SERVICES

<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of 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:

Fire protection, sheriff protection, schools, parks, libraries?

### **Regulatory Setting**

#### **California Health and Safety Code (Section 13000 et seq.)**

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations related to building standards, fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and child care facility standards, and fire suppression training.

#### **California Code of Regulations Title 24, Part 2 and Part 9**

Part 2 refers to the California Building Code, which includes complete regulations and general construction building standards including administrative, fire and life safety, and field inspection provisions. Part 9 refers to the California Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24. This code was revised in January 2019 with a change in the base model/consensus code from the Uniform Fire Code series to the International Fire Code.

#### **California Public Resources Code, Section 4201-4204**

This section of the California Public Resources Code requires the California Department of Forestry to classify all State Responsibility Areas (SRAs) into fire hazard severity zones. The purpose of this code is to provide classification of lands within SRAs in accordance with the severity of fire hazard present for the purpose of identifying measures to be used to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

#### **State Responsibility Area Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry and Fire Protection)**

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in SRAs. Title 14 mandates that the future design

and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures.

### **2019 California Fire Code**

The California Fire Code (24 CCR Part 9) establishes regulations to protect life and property from the hazards of fires in new and existing buildings and structures. The Fire Code also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California. The Fire Code includes regulations regarding fire resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire service features such as fire apparatus access roads, means of egress fire safety during construction and demolition, and wildland-urban interface areas.

### **Los Angeles County 2035 General Plan**

The Safety Element of the General Plan provides the following goals and policies potentially relevant to the Draft 2045 CAP (County of Los Angeles 2015):

**Goal S 4:** Effective County emergency response management capabilities.

- Policy S 4.1:** Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- Policy S 4.2:** Support County emergency providers in reaching their response time goals.
- Policy S 4.3:** Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.
- Policy S 4.4:** Encourage the improvement of hazard prediction and early warning capabilities.
- Policy S 4.5:** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.
- Policy S 4.6:** Ensure that essential public facilities are maintained during natural disasters, such as flooding.

The Public Services and Facilities Element of the General Plan provides the following goals and policies potentially relevant to the Draft 2045 CAP (County of Los Angeles 2015):

**Goal PS/F 1:** A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.

- Policy PS/F 1.1:** Discourage development in areas without adequate public services and facilities.
- Policy PS/F 1.2:** Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.

- Policy PS/F 1.3:** Ensure coordinated service provision through collaboration between County departments and service providers.
- Policy PS/F 1.4:** Ensure the adequate maintenance of infrastructure.
- Policy PS/F 1.5:** Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.
- Policy PS/F 1.6:** Support multi-faceted public facility expansion efforts, such as substations, mobile units, and satellite offices.
- Policy PS/F 1.7:** Consider resource preservation in the planning of public facilities.

### **Developer Fee for the Consolidated Fire Protection District of Los Angeles County**

In response to increasing demands for new facilities, equipment, and staffing created by new development, the County has implemented a Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment in the high-growth areas of the County (County of Los Angeles 2020a). The developer fees, which are specified in the Developer Fee Detailed Fire Station Plan (County of Los Angeles 2020a), are paid to the Consolidated Fire Protection District of Los Angeles County (Fire District). This Fire District developer fee is adjusted annually and is charged on all new development, including residential buildings, new detached residential accessory structures, new commercial buildings, and new additions over 2,000 square feet prior to building permit issuance.

### **Los Angeles County Title 22 Planning and Zoning Codes – Mitigation Fees Section 22.246.060**

#### **Section 22.246.070 Law Enforcement Facilities Fee**

According to Chapter 22.14, Definitions, of Los Angeles County’s Title 22 Planning and Zoning Code, law enforcement fees provide funds for law enforcement facilities related to residential, commercial, office, and/or industrial development projects. The amount to be paid is determined based on which law enforcement facilities fee zone the proposed project is located in: Zone 1: Santa Clarita Zone, Zone 2: Newhall Zone, and Zone 3: Gorman Zone.

#### **Library Facilities Mitigation Fee**

According to the County’s General Plan, the library facilities mitigation fee is based on the estimated cost of providing the projected library facility needs in each library planning area (County of Los Angeles 2015). The mitigation fee shall provide funds for library facilities related to a residential development project.

#### **School District Developer Fees**

Los Angeles Unified School District has developer fee collection rates for residential and commercial/industrial developments. Compton Unified School District collects developer fees for residential and commercial/industrial developments. Districts that do not collect developer fees include Montebello Unified, Pasadena Unified, Hawthorne Unified, Rowland Unified, and Centinela Valley Union High School District (Los Angeles County, 2021).

### **Discussion**

Increases in demand for public services such as fire protection, schools, parks, and libraries are generally created by increases in population. The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions. The Draft 2045 CAP does not propose any changes to the land use

designations or density beyond what is currently allowed under the General Plan. Therefore, adoption of the Draft 2045 would not be anticipated to result in substantially new or increased population growth not already accounted for in the General Plan that could in turn require the construction of new or expanded public services.

While the Draft 2045 CAP itself does not include any project proposals, it would promote the development of projects designed to increase water conservation, energy efficiency, and low-carbon transportation. Many of these projects would involve retrofitting and improving existing buildings and developments. The Draft 2045 CAP includes measures that would encourage green space, which could result in the construction or expansion of parks and open spaces. Some of the projects could involve new construction of water recycling facilities, composting facilities, and solar energy generation facilities as allowed under General Plan land use designations. Projects implementing CAP measures are likely to require construction work crews. However, projects implementing CAP measures are anticipated to have generally short construction periods and construction workers could come from within the existing community. Thereby, substantial population growth inducement is not expected beyond what was accounted for in the General Plan buildout. The location and design of projects intended to implement CAP policies are not known. Individual projects implementing CAP policies would be required to comply with applicable land use plans and regulations designed to ensure adequate public services including those identified above under the regulatory setting. Therefore, impacts from adoption of the Draft 2045 CAP on demand for public services would be less than significant.

### **References**

County of Los Angeles Department of Regional Planning, 2021. Program Environmental Impact Report for the Los Angeles County Housing Element Update. June 2021. URL: [https://planning.lacounty.gov/assets/upl/project/Housing\\_peir.pdf](https://planning.lacounty.gov/assets/upl/project/Housing_peir.pdf)

**16. RECREATION**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) <b>Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Regulatory Setting**

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. An increase in the use of existing neighborhood and regional parks or recreational facilities typically would occur as a result of population growth. The Draft 2045 CAP does promote buildout to the higher densities allowed near high quality transit areas and mixed-use development (Measure T1 and T2). However, as described in Section 14, *Population and Housing*, the Draft 2045 CAP would not result in an unanticipated increase in density or population growth outside of what was accounted for in General Plan. Therefore, the Draft 2045 CAP would not result in substantial new unplanned population growth that could in turn result in the increase use of recreational facilities causing the creation or acceleration of substantial physical deterioration of recreational facilities.

The Draft 2045 CAP would promote implementation projects that could include mixed-use developments, solar energy generation facilities, waste management facilities, transit routes, and water recycling facilities. Depending on the location of such implementing projects, construction could have the potential to result in minor disruptions to recreational resources. However, these disruptions are expected to be temporary, would occur at different locations throughout the County, and would not result in a significant disruption of recreational resources in one neighborhood or location such that any increase in use of the facilities would create or accelerate substantial physical deterioration.

The Draft 2045 CAP would not result in population growth outside of densities and growth accounted for in the existing General Plan and 2021-2019 Housing Element. For these reasons, the potential for the Draft 2045 CAP to cause or accelerate substantial physical deterioration would be less than significant., this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

b) <b>Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. The Draft 2045 CAP includes measures that would encourage green space, which could result in the construction or expansion of parks and open spaces. The Draft 2045 CAP includes Measure A3 which encourages the expansion of green spaces in unincorporated areas of the County. This



measure could promote the construction of new parks or recreational facilities or the expansion of existing green spaces as allowed under current General Plan land use designations. The expansion of existing recreational facilities could require some demolition and minor construction impacts. The construction of new recreational facilities could also result in demolition of existing buildings and minor construction impacts. The creation of new green space could result in environmental impacts; however, in general, the expansion of green spaces is likely to improve environmental conditions by creating more potential habitat improving aesthetics, creating more carbon sequestration opportunities, and creating more infiltration for water runoff. Furthermore, the construction impacts of creating new open space would generally be expected to be short-term and minor. Overall creating additional green space is expected to result in beneficial environmental impacts. Additionally, projects implementing CAP measures would be required to comply with applicable land use plans and policies for recreational facilities including those identified above. Impacts are considered less than significant.

**c) Would the project interfere with regional trail connectivity?**                                                                                       

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. The Draft 2045 CAP promotes the expansion of bicycle and pedestrian networks (Measure T3) and the expansion of green space (Measure A3). These measures are anticipated to promote projects to expand regional trail connectivity that would result in beneficial impacts. Additionally, projects implementing CAP measures would be required to comply with applicable land use plans and policies for recreational facilities including those identified above. Impacts are considered less than significant.

## 17. TRANSPORTATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

The Draft 2045 CAP would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and no changes to land use designations are proposed as part of the Draft 2045 CAP. The Draft 2045 CAP would be a policy document to provide a community-wide approach to the reduction of GHG emissions from community activities, including future development under the General Plan. While significant impacts are not anticipated, consistency with applicable plans, policies, and regulations related to the circulation system, transit, roadway, bicycle and pedestrian facilities will nonetheless be evaluated further in the EIR.

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

The Draft 2045 CAP would provide an approach to the reduction of GHG emissions from community activities, including future development under the General Plan. The potential for GHG reduction measures to result in reductions in vehicles miles traveled (VMT) is anticipated to result in less than significant impacts. Nonetheless, this issue will be further evaluated in the EIR.

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

The Draft 2045 CAP would provide an approach to the reduction of GHG emissions from community activities, including future development under the General Plan. While significant impacts are not anticipated, the potential for GHG reduction measures to increase hazards due to a road design feature or incompatible uses will be evaluated further in the EIR.

**d) Result in inadequate emergency access?**

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The 2019 County of Los Angeles All-Hazards Mitigation Plan does not include specific evacuation routes to be used in the event of an emergency (County of Los Angeles 2019). However, the General Plan includes a map of freeway and highway Disaster Routes, many of which cross through portions of the unincorporated County (Los Angeles County 2015). Depending on the nature of projects implementing Draft 2045 CAP measures, they may require construction in major roadways or the closure of major roadways to facilitate construction activities. If construction activities within major roadways or road closures were required to facilitate projects implementing Draft 2045 CAP measures, then activities could obstruct major roadways and could hinder evacuation procedures.

Although the locations and details of potential projects implementing Draft 2045 CAP measures are not known at the time of this analysis, such projects would be subject to individual project review pursuant to the grading or building permit application process. If, based on such review, it is determined that a specific project could conflict with an emergency response or evacuation plan, then a project-specific traffic control plan would be required to avoid such conflicts. Because any potential impacts to the implementation of an emergency response or evacuation plan would be identified and addressed before a related impact could occur, the impacts associated with implementation of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

## 18. TRIBAL CULTURAL RESOURCES

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- |  |                                     |                          |                          |                          |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <p><b>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or</b></p> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|

Los Angeles County is situated on land traditionally occupied by indigenous people associated with five Native American groups: Gabrielino (including the Tongva and Kizh), Tataviam, Serrano, Kitanemuk, and Ventureño Chumash. These groups have rich heritage and deep traditional and cultural values associated with the natural environment and material culture.

Signed into law in September of 2014, Assembly Bill (AB) 52, established “tribal cultural resources” as a new class of resources under CEQA. Tribal cultural resources are defined in PRC 21074 as “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.” Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, where one or more California Native American Tribes has requested formal written notification of proposed projects from a lead agency, the lead agency shall provide formal written notification of proposed projects and engage in consultation with requesting tribes as prescribed in the statute.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element. As a policy document, the Draft 2045 CAP itself would not result in direct impacts to tribal cultural resources.

On October 21, 2019, the County submitted notification and request to consult letters to five (5) individuals and organizations pursuant to AB 52. On October 21, 2019, the County also submitted notification and request to consult letters to twenty-four (24) individuals and organizations pursuant to SB 18. In particular, AB 52 letters were sent via mail to the following California Native American tribes and individuals:

- Andrew Salas, Gabrieleño Band of Mission Indians – Kizh Nation
- Anthony Morales, Gabrieleno Tongva San Gabriel Band of Mission Indians
- Jairo Avila, Fernandeño Tataviam Band of Mission Indians
- Lee Clauss, San Manuel Band of Mission Indians

- Octavio Escobedo, Tejon Indian Tribe

No responses were received from any of the individuals/organizations pursuant to AB 52.

SB 18 letters were sent via mail to the following California Native American tribes and individuals:

- Andrew Salas, Gabrieleño Band of Mission Indians – Kizh Nation
- Anthony Morales, Gabrieleno Tongva San Gabriel Band of Mission Indians
- Charles Alvarez, Gabrielino – Tongva Tribe
- Donna Yocum, San Fernando Band of Mission Indians
- Fred Collins, Northern Chumash Tribal Council
- Gino Altamirano, Coastal Band of the Chumash Nation
- Jairo Avila, Fernandeno Tataviam Band of Mission Indians
- Julie Tumamait-Stenslie, Barbareno/Ventureno Band of Mission Indians
- Julio Quair, Chumash Council of Bakersfield
- Kenneth Kahn, Santa Ynez Band of Chumash Indians
- Lee Clauss, San Manuel Band of Mission Indians
- Gino Altamirano, Coastal Band of the Chumash Nation
- Mark Cochrane, Serrano Nation of Mission Indians
- Mark Vigil, San Luis Obispo County Chumash Council
- Matias Belardes, Juaneno Band of Mission Indians Acjachemen Nation
- Mona Tucker, yak tityu tityu yak tithini-Northern Chumash Tribe
- Robert Dorame, Gabrielino Tongva Indians of California Tribal Council
- Robert L. Gomez, Tubatulabals of Kern Valley
- Robert Martin, Morongo Band of Mission Indians
- Robert Robinson, Kern Valley Indian Community
- Rudy Ortega, Fernandeno Tataviam Band of Mission Indians
- Sandonne Goad, Gabrielino/Tongva Nation
- Sonia Johnston, Juaneno Band of Mission Indians
- Teresa Romero, Juaneno Band of Mission Indians Acjachemen Nation – Romero
- Wayne Walker, Serrano Nation of Mission Indians

A total of five responses were received from the individuals/organizations pursuant to SB 18. The Juaneño Band of Mission Indians Acjachemen Nation-Belardes, Morongo Band of Mission Indians, and the San Manuel Band of Mission Indians indicated they had no concerns regarding the project and did not request consultation. The Santa Ynez Band of Chumash Indians also did not request consultation; however, they indicated that if supplementary literature reveals additional information, or if the scope of work were to change, that they would like to be notified. The Coastal Band of Chumash Indians requested consultation. In response, the County submitted emails on November 21, 2019 and January 8, 2020 to schedule a consultation meeting with the Coastal Band of Chumash Indians, but no response was received. The County also sent a letter via regular mail and email on March 11, 2020 to once again schedule a consultation call with the Coastal Band of the Chumash Nation; however, no response was received.

The AB 52 and SB 18 Native American consultation documentation is provided in Appendix A of this IS.

No tribal cultural resources were identified as a result of consultations that are either listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources.

Future projects to implement some GHG reduction measures contained in the Draft 2045 CAP would involve structural improvements and/or ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of a tribal cultural resource. Future projects would be required to comply with existing federal, State, and local regulations, and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA, including compliance with AB 52. Such projects could nonetheless result in significant impacts to tribal cultural resources either listed in or eligible for listing in the CRHR or local register and mitigation measures may be needed. Impacts to tribal cultural resources are considered to be potentially significant and will be further evaluated in the EIR.

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

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2021 Housing Element. As a policy document, the Draft 2045 CAP itself would not result in direct impacts to tribal cultural resources.

As mentioned above, no tribal cultural resources were identified as a result of consultations

Future projects to implement some GHG reduction measures contained in the Draft 2045 CAP would involve structural improvements and/or ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of a tribal cultural resource. Future projects would be required to comply with existing federal, State, and local regulations, and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA, including compliance with AB 52. Such projects could nonetheless result in significant impacts to tribal cultural resources determined by the lead agency in its discretion to be

significant. Impacts to tribal cultural resources are considered to be potentially significant and will be further evaluated in the EIR.

**19. UTILITIES AND SERVICE SYSTEMS**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly result in new or expanded facilities. However, Draft 2045 CAP Strategies could promote the construction of new facilities in order to achieve water conservation and recycling goals, energy efficiency goals, renewable energy goals, and waste diversion goals. Some of the measures may result in retrofitting, plumbing and electrical modifications in existing buildings or the installation of new features such as rooftop solar or water recycling systems (Measure E2, Measure E7, Measure E8, Measure E9, and Measure W3). In general, projects implementing Draft 2045 CAP measures are expected to result in beneficial environmental impacts to utilities by reducing water demand, reducing the demand on water recycling facilities, and reducing the demand for natural gas and electrical power through energy efficiency measures and measure to achieve low-carbon energy use (Measures E1 through E4 and Measure E7).

As described above, the Draft 2045 CAP would result in primarily beneficial impacts with regard to the use of water wastewater treatment, electric power, natural gas, stormwater drainage. The Draft 2045 CAP could promote the construction of new facilities such as new water recycling facilities, EV charging stations, composting facilities, and solar energy generation facilities which have the potential to result in environmental impacts. Development of potential future projects supported by Draft 2045 CAP measures would be evaluated on an individual basis once details are known. No changes to General Plan land use designations are proposed. Therefore, the Draft 2045 CAP would not result in an unanticipated increase in density or population growth outside of what was accounted for in the General Plan that could result in increased demand for utilities. As such, implementing the Draft 2045 CAP would not create new demand related to water, wastewater, stormwater drainage, electric power, natural gas power, or telecommunications utilities. Impacts to this criterion are considered less than significant. Accordingly, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**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"/>
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The Draft 2045 CAP includes a number of actions to increase the use of alternate water sources and reduce water consumption. Included within Measure E8 are implementing actions to develop a net zero water ordinance, remove barriers for retrofitting on-site gray water recycling systems, and to partner with LA County



to explore the potential for indirect potable reuse. The performance goals for Measure 8 include the following: 1) 100% of new development is net zero water by 2030; and 2) achieve 80% use of recycled water for agricultural and industrial uses by 2045. Measure E9 which is intended to reduce indoor and outdoor water consumption includes the following performance goals: 1) reduce water consumption by 50% by 2045; 2) adopt a water efficiency ordinance for existing buildings; 3) reduce outdoor landscaping water use by 50% by 2045; and 4) reduce municipal water consumption by 50% by 2045. As demonstrated by the performance metrics, implementation of Measure E8 and E9 would reduce municipal, agricultural, industrial, and outdoor landscaping water use substantially. While the Draft 2045 CAP may promote development that may require water for construction and operation, these developments would be required to comply with the Draft 2045 CAP measures that require net zero water in new development and significant reductions in indoor and outdoor water use for municipal, commercial, and industrial development. Therefore, overall, the strategies and measures proposed in the Draft 2045 CAP would result in reductions in water demand. While the Draft 2045 CAP may result in the development of facilities that would require water for construction and operation, these developments would be required to comply with the adopted Draft 2045 CAP and; therefore, would be required to be net zero water and would not result in additional water demand. Therefore, the Draft 2045 CAP would have a beneficial impact with regard to water supply, impacts would be less than significant this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**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?**

The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly result in increased demand on wastewater treatment facilities. Increases in the demand for wastewater treatment is generally associated with an increase in population. As described in Section 14, *Population and Housing*, the Draft 2045 CAP would be consistent with the General Plan and the 2021-2029 Housing Element and would not result in population growth outside of what was accounted for in the General Plan. Therefore, the buildout assumptions that inform the measures in the Draft 2045 CAP would be consistent with the population growth planned for in the General Plan and 2021-2029 Housing Element.

The Draft 2045 CAP would include measures to increase water conservation which could result in a slight decrease in the amount of wastewater required to be treated by wastewater treatment providers. Some measures in the Draft 2045 CAP would promote the development of facilities which could include mixed use development, water recycling facilities, or compost processing facilities (Measure E8, Measure W1, and Measure W3). These facilities could result in an increase in demand for wastewater treatment. Development of potential future projects supported by Draft 2045 CAP measures would be evaluated on an individual basis once details are known. Individual proposals for projects supported by CAP measures would be required to undergo project-level CEQA review and disclose any potential impacts related to wastewater treatment and provide mitigation of any significant impacts, if necessary. Impacts are considered less than significant.

**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?**

The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly generate solid waste. The Draft 2045 CAP encourages the reduction of solid waste and includes Strategy 9 to reduce GHG emissions associated with solid waste generation. The intent is to increase solid waste diversion in order to reduce the amount of solid waste placed in landfills. Strategy 9 includes Measure W1, which includes implementing actions to increase organic composting in non-residential buildings and within communities. The performance goal for Measure W1 is to reach an organic diversion rate of 95% by 2045. Measure W2 includes implementing actions in order to increase the diversion of recyclable materials. Measure W3 includes implementing measures to incorporate sustainable waste systems and practices with a goal of decreasing per capita waste by 35% by 2045. The implementation of these measures would reduce solid waste generation within the County and impacts would be beneficial. While the Draft 2045 CAP could indirectly promote the construction of facilities in order to meet water recycling, waste diversion, and renewable energy goals which could result in minor amount of waste generated by project construction and operation, these implementing projects would also be required to comply with the waste management measures proposed in the Draft 2045 CAP. Therefore, adoption of the Draft 2045 CAP would not generate substantial solid waste or impair attainment of solid waste reduction goals and impacts would be less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

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

As mentioned above, the adoption of the Draft 2045 CAP would result in beneficial impacts with regard to solid waste management and the diversion of waste from landfills. Any new facilities required to support the measures in the Draft 2045 CAP would be required to comply with existing regulations for solid waste management including the permitting requirements of CalRecycle. Requisite compliance with management and reduction statutes and regulations related to solid waste would ensure that the impacts of the Draft 2045 CAP would be less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

**20. WILDFIRE**

	<i>Less Than Significant</i>		
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

**If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**

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

According to fire hazard mapping by the California Department of Forestry and Fire Protection (CAL FIRE), as part of the Fire and Resource Assessment Program (FRAP), there are several areas classified as Very High Fire Hazard Severity Zones (VHFHSZ) within the unincorporated County (CAL FIRE 2012). Fire Protection within unincorporated LA County is provided by the Los Angeles County Fire Department (LACoFD). Areas designated as VHFHSZs are located in the Santa Monica Mountains, the Palos Verdes Peninsula, the San Gabriel Mountains, and portions of the Angeles National Forest and Los Padres National Forest. Within the portions of the County designated as VHFHSZs, there are areas designated as Federal Responsibility Areas, State Responsibility Areas, and Local Responsibility Areas. LACoFD responds to wildland fires and urban fires. In recent year, the LACoFD has faced planning issues related to the recent increase in the frequency and severity of wildland fires and changes to urban fire considerations due to increases in the intensity of development and the number of potentially affected populations (LA County 2015). The LA County Fire District’s 2017-2021 Strategic Fire Plan includes strategies to meet three overarching goals related to emergency operations, public service, and organizational effectiveness. Most of the strategies included in this plan are administrative in nature and aimed at building the LACoFD’s capacity to respond to hazards. The Draft 2045 CAP would be a policy document and does not propose any specific projects that could conflict with the Strategic Plan (LA County 2018). All projects that would be indirectly encouraged by the Draft 2045 CAP would be required to be consistent with this plan and any future LACoFD emergency response or planning documents.

As described in Section 9, *Hazards and Hazardous Materials* under criterion f), the Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2021 Housing Element. The Draft 2045 CAP itself does not include any specific projects or proposals that could directly conflict with adopted emergency response or emergency evacuation plans.

The 2019 County of Los Angeles All-Hazards Mitigation Plan does not include specific evacuation routes to be used in the event of an emergency (County of Los Angeles 2019). However, the General Plan includes a map of freeway and highway Disaster Routes, many of which cross through portions of the unincorporated County (Los Angeles County 2015). Depending on the nature of projects implementing Draft 2045 CAP measures, there may be activities that require construction in major roadways or may require the closure of major roadways to facilitate construction activities. If construction activities within major roadways or road closures were required to facilitate projects implementing Draft 2045 CAP measures, then activities could obstruct major roadways and could hinder evacuation procedures.

Although the locations and details of potential projects implementing Draft 2045 CAP measures are not known at the time of this analysis, such projects would be subject to individual project review pursuant to the grading or building permit application process. If, based on such review, it is determined that a specific project could conflict with an emergency response or evacuation plan, then a project-specific traffic control plan would be required to avoid such conflicts. Because any potential impacts to the implementation of an emergency response or evacuation plan would be identified and addressed before a related impact could occur, the impacts associated with implementation of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**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?**

LA County is large, and the topography, vegetation and climate vary across the County. Large portions of the undeveloped areas of the County (particularly in the Santa Monica Mountains, Santa Clarita Valley, and Antelope Valley) include the following vegetation types: coastal sage, riparian oak woodlands, and chaparral. Fire risk in LA County is particularly high in the undeveloped areas of the County that are designated as VHFHSZ. These areas typically contain chaparral ecosystems as they contain volatile oils that are particularly flammable. Additionally, chaparral communities are typically located in mountainous areas where the steep terrain can fuel the spread of wildfire (LA County 2021).

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include any specific projects that could directly expose structures or occupants to wildfire risks. Since no changes to land use designations or specific projects are proposed as part of the Draft 2045 CAP, no new or substantially increased risks associated with wildfires are anticipated.

Projects promoted by the Draft 2045 CAP that could include housing would likely be developed in urban areas which are already developed and not located in undeveloped areas with high fire risk. Some projects implementing Draft 2045 CAP measures such as composting facilities, water recycling facilities, or renewable generation facilities could be located in areas designated as VHFHSZs. Depending on the location and site-specific conditions of implementing projects, such projects could increase the risk of an ignition during construction due to the use of equipment, vehicles, and tools and the storage of fuels and other flammable materials. As described in Section 9, *Hazard and Hazardous Materials*, under criterion g), new development would be required to comply with Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance with the County Fire Code also would ensure developments that are within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. The operation of most facilities that would be promoted by the Draft 2045 CAP would not be expected to substantially increase wildfire risk. Projects also would be required to comply with the California Building Code which identifies building fire safety requirements such as sprinklers, resistance standards, and the clearance of debris and vegetation within a prescribed distance from structures in wildfire hazard areas.

Furthermore, future projects would be required to comply with the General Plan policies, which are intended to reduce the potential for development to be located in high fire hazard areas and encourage mitigation to ensure that developments are built to be fire resistant and have the capacity to ensure proper ingress, egress, and sufficient fire suppression resources onsite:

- Policy S 3.1:** Discourage high density and intensity development in VHFHSZs.
- Policy S 3.2:** Consider climate change implications in planning for FHSZs.
- Policy S 3.3:** Ensure that the mitigation of fire related property damage and loss in FHSZs limits impacts to biological and other resources.
- Policy S 3.4:** Reduce the risk of wildland fire hazards through the use of regulations and performance standards, such as fire-resistant building materials and vegetation.
- Policy S 3.5:** Encourage the use of fire-resistant vegetation that is compatible with the area’s natural vegetative habitats in fuel modification activities.
- Policy S 3.6:** Ensure adequate infrastructure, including ingress, egress, and peak load water supply availability for all projects located in FHSZs.
- Policy S 3.7:** Consider siting and design for developments located within FHSZs, particularly in areas located near ridgelines and on hilltops, to reduce the wildfire risk.
- Policy S 3.8:** Support the retrofitting of existing structures in FHSZs to help reduce the risk of structural and human loss due to wildfire.

Compliance with the LA County Fire Code, California Building Code, and the LA County General Plan would reduce the risk that future projects would be in fire-prone areas and would ensure that developments contain proper fire prevention measures and capacity for fire suppression during construction and operation. While the Draft 2045 CAP itself would not result in any direct impacts to wildfire risk, compliance with these codes and policies would significantly reduce the potential for the Draft 2045 CAP to indirectly result in projects that could expose people to the risks from the spread of wildfire. Requisite compliance with independently enforceable provisions of laws, regulations, plans and standards (including those set forth in the LA County Fire Code, California Building Code, and the General Plan) would assure that the adoption and implementation of the Draft 2045 CAP would result in a less than significant impact relating to the potential exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

**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?**

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with

adoption of the 2021-2021 Housing Element. The Draft does not include any specific project proposal and therefore, would not result in any direct increases in wildfire risk that would necessitate the installation of fire prevention infrastructure such as fuel breaks, and emergency water sources. Individual proposals for project supported by Draft 2045 CAP measures would be required to undergo project-level review and disclose any potential impacts related to wildfire risk and provide mitigation of any significant impacts, if necessary. If fuel breaks, emergency water sources, or other fire prevention features are required to reduce wildfire risks, then the environmental impacts of those features would be evaluated as part of the project-level CEQA review. In addition to any project-specific fire-related mitigation recommendations, any new development within Los Angeles County (including the unincorporated areas) would be subject to Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance with the County Fire Code would also ensure developments that are within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. Further, any project that would result from the adoption of the Draft 2045 CAP would be required to address fire risks before the potential impact could result. Accordingly, this topic will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

**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?**                                                                               

As described under criterion b), the portions of the County that are designated as VHFHSZs are characterized by steep slopes that could create the potential for downslope or downstream flooding, landslides, or runoff. Also as described under criterion b), the Draft 2045 CAP would not directly result in any projects that would increase wildfire risk or alter slopes or drainage patterns in a manner that could increase the risk for post fire downslope or downstream flooding or landslides. Projects implementing Draft 2045 CAP measures could, depending on the location and site-specific conditions of projects, increase the risk of wildfire and post-fire flooding or landslides. As described above, all future projects would be required to comply with the County Fire Code, California Building Code, and the General Plan policies which would reduce the extent to which future projects would increase fire risk. Additionally, future projects would be subject to project-level review where site specific fire risk would be evaluated and mitigation, if necessary, would be applied to address significant impacts. Therefore, the potential for future implementing projects to result in the ignition of a fire which could result in downstream flooding or landslides would be less than significant at the project level as well as cumulatively.

Additionally, As discussed in Section 7, *Geology and Soils*, under criterion a.iv), if projects implementing the CAP measures were to be proposed in susceptible areas, significant effects due to the impacts of landslides could result. However, all new developments would be required to comply with the California Building Code and the County Building Code. Requisite compliance with these codes would ensure that each new development would not result in a potential significant impact either at the project level or cumulatively.

Requisite compliance with applicable laws, regulations, and ordinances would assure that new projects implementing Draft 2045 CAP measures would not result in a significant impact. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2021 Housing Element. The Draft 2045 CAP does not include any specific projects that could directly expose structures or occupants to a significant risk of loss, injury or death involving wildland fires. Since no changes to land use designations or specific projects are proposed as part of the Draft 2045 CAP, no new or substantially increased risks associated with wildfires are anticipated.

Some projects implementing Draft 2045CAP measures such as composting facilities, water recycling facilities, or renewable energy generation facilities could be located in areas designated as VHFHSZs. Depending on the location and site-specific conditions of implementing projects, they could increase the risk of an ignition during project construction due to the use of equipment, vehicles, and tools and the storage of fuels and other flammable materials. As described in Section 9, *Hazard and Hazardous Materials*, under criterion g), and further analyzed above under criterion b), new development would be required to comply with the Los Angeles County Fire Code, the California Building Code, and policies in the General Plan that require that fire prevention measures be incorporated into development and that developments include proper ingress and egress and equipment to respond to fire hazards. Compliance with these requirements would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance also would ensure that any future developments that are proposed within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. The operation of most facilities that would be promoted by the Draft CAP would not be expected to substantially increase wildfire risk.

For these reasons, any new projects implementing Draft 2045 CAP measures would not result in a significant impact relating to this criterion. Therefore, it will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

**References**

LA County Fire Department (LACoFD), 2018. 2017-2021 Strategic Plan. URL: <https://fire.lacounty.gov/wp-content/uploads/2019/09/LACoFD-Strategic-Plan-2017-2021.pdf> . June 21, 2018.

LACoFD, 2021. LA County Fire Department 2021 Strategic Plan. URL: [https://osfm.fire.ca.gov/media/lyulfm3z/2021\\_lac\\_fireplan.pdf](https://osfm.fire.ca.gov/media/lyulfm3z/2021_lac_fireplan.pdf) . June 9, 2021.

California Department of Forestry and Fire Protection (CAL FIRE), 2011. Fire Hazard Severity Zones in Local Responsibility Areas (LRA). Forest Resource Assessment Program. Map. Scale 1:150,000.

Los Angeles County, 2015. Los Angeles County General Plan 2035. Chapter 12, Safety Element. Disaster Routes.

**21. MANDATORY FINDINGS OF SIGNIFICANCE**

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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**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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As disclosed in Section 4, Biological Resources under criterion a), projects implementing Draft 2045 CAP measures have the potential to result in impacts to candidate, sensitive, or special status species such as Swainson’s hawk and Arroyo toad. Impacts to candidate, sensitive, and special status species are considered to be potentially significant and will be further evaluated in the EIR. Similarly, the potential for the Draft 2045 CAP to result in substantial adverse effects on sensitive natural communities (evaluated in Section 4, Biological Resources under criterion b) is considered to be potentially significant and will be evaluated further in the EIR. Section 4, Biological Resources also identified the potential for projects implementing Draft 2045 CAP measures to impact federally protected wetlands (evaluated in criterion c), interfere with the movement of migratory fish, native resident, or wildlife species (evaluated under criterion d), or convert oak woodlands or other unique native woodlands (evaluated under criterion e) to be potentially significant. Therefore, the potential for the Project to result in impacts to these biological resources will be evaluated further in the EIR.

As analyzed in Section 5, Cultural Resources, the Draft 2045 CAP has the potential to impact historical resources and archaeological resources. As analyzed in Section 13, the Draft 2045 CAP has the potential to impact tribal cultural resources. Therefore, potential impacts related to cultural resources and tribal cultural resources will be evaluated further in the EIR.

**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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. According to CEQA Guidelines Section 15130(e), if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further



analyze that cumulative impact. Potential cumulative impacts would result if the Draft 2045 CAP promotes growth in the County in excess of what was accounted for in the General Plan and the 2021-2029 Housing Element. The potential for cumulative effects will be considered in the EIR.

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

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. The Draft 2045 CAP does not include any specific projects that could directly result in adverse effects on human beings. However, projects implementing Draft 2045 CAP measures could result in potentially significant impacts as disclosed throughout this Initial Study. Therefore, the potential for Air Quality, Noise, and Transportation and other potentially significant impacts to result in a potentially significant impact to human beings will be evaluated further in an EIR.

# APPENDIX A

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## Tribal Consultation