

CRA Transfer of Land Use Authority Project

Case Number: ENV-2019-4121-ND

Project Location: The Project Location consists of the 19 unexpired Redevelopment Project Areas located throughout the City. The 19 unexpired Redevelopment Project Areas are: North Hollywood, Chinatown, Broadway/Manchester, Wilshire/Koreatown, Crenshaw, Crenshaw/Slauson, Watts Corridor, Council District 9, Hollywood, Mid-City, Western/Slauson, Vermont/Manchester, Laurel Canyon, Westlake, Exposition/University Park, Adelante Eastside, Pacific Corridor, City Center, and Central Industrial.

Community Plan Area: San Pedro, Wilmington-Harbor City, Southeast Los Angeles, South Los Angeles, West Adams-Baldwin Hills-Leimert, Boyle Heights, Central City North, Central City, Westlake, Wilshire, Northeast Los Angeles, Hollywood, and North Hollywood-Valley Village.

Council District: 1–Cedillo, 2–Krekorian, 4–Ryu, 8–Harris-Dawson, 9–Price, 10–Wesson, 13– O'Farrell, 14–Huizar, 15–Buscaino

Project Description: The proposed Project consists of two legislative actions to transfer the land use authority from the Community Redevelopment Agency of the City of Los Angeles, Designated Local Authority (CRA/LA-DLA) to the City of Los Angeles: (1) a Resolution transferring the land use plans and functions to the City pursuant to Assembly Bill (AB) 1484 and (2) an Ordinance amending the Los Angeles Municipal Code (LAMC) to facilitate the transfer of land use plans and functions to the City, including codifying Redevelopment Plan review processes into the City's procedures for review and approval of development projects ("Project"). The proposed Project, by itself, does not propose or authorize new development or construction or ground disturbing activity. The proposed Project will authorize and establish processes for the Department of City Planning to administer the land use plans and consolidate project review of development projects within a single entity in the City in the remaining 19 unexpired Redevelopment Project Areas. The intent of the proposed Project is to ensure continuity of land use controls in the 19 unexpired Redevelopment Project Areas (collectively known as "Project Location"). CRA/LA Designated Local Authority (CRA/LA-DLA), as the Successor Agency, will no longer perform redevelopment activities but is expected to wind down operations pursuant to Assembly Bill (AB)X1 26 (which dissolved redevelopment agencies).

> **PREPARED BY:** The City of Los Angeles Department of City Planning

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INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

For the project, the City of Los Angeles is the Lead Agency and the City Council is the decisionmaker. The Department of City Planning (DCP) is the department responsible for preparing the environmental document and recommending the CEQA findings to the City Council. The DCP in its initial review of the project pursuant to CEQA Guidelines Section 15061(a) determined the project is categorically exempt from CEQA pursuant to CEQA Guidelines Section 15308 and 15320. Based on this, the DCP prepared a notice of exemption pursuant to CEQA Guidelines Section 15062 and processed the project with an exemption through all public hearings on the project, including the December 20, 2018 City Planning Commission hearing and the March 19, 2019 Planning and Land Use Management Council Committee (PLUM) hearing. At the March 19, 2019, PLUM hearing, the City received numerous comments on the City's environmental review of the project. Based on the entire administrative record, including all comments received at the PLUM hearing and this initial study, the DCP is recommending that the project is exempt under CEQA Guidelines section 15308 and 15320.

With the above said, courts have recognized that a lead agency may prepare and approve multiple CEQA documents for the same project all of which may be valid and comply with CEQA. See, e.g., *Rominger v. County of Colusa* (2014) 229 Cal.App.4th 690, 700 (county not prohibited from both approving MND and arguing CEQA exemption); *Santa Barbara County Flower and Nursery Growers Assoc., Inc. v. County of Santa Barbara* (2004) 121 Cal.App.4th 864 (county did not waive exemption argument by preparing an EIR). Based upon this and in light of comments received at the March 19, 2019 PLUM Committee Hearing, the DCP desires to provide additional review and analysis for the public and the decision-maker prior to final project approval. Therefore, the DCP has prepared this Initial Study/Negative Declaration and will circulate it for public review consistent with CEQA Guidelines Section 15072 and 15073 prior to going back to PLUM with the project for Council approval. CEQA Guidelines Section 15202. Finally, notwithstanding the preparation and/or adoption of this Initial Study/Negative Declaration, the City does not intend to waive the ability of the City to determine that the project is exempt from CEQA.

This Initial Study (IS) document evaluates potential environmental effects resulting from reasonably foreseeable indirect impacts of the proposed CRA Transfer of Land Use Project ("Project"). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment.

1.1 PURPOSE OF AN INITIAL STUDY

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the

environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

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

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	CRA TRANSFER OF LAND USE AUTHORITY
ENVIRONMENTAL CASE NO.	ENV-2019-4121-ND
RELATED CASES	CPC-2018-6005-CA; ENV-2018-6006-CE
PROJECT LOCATION	
COMMUNITY PLAN AREA	San Pedro, Wilmington-Harbor City, Southeast Los Angeles, South Los Angeles, West Adams-Baldwin Hills- Leimert, Boyle Heights, Central City North, Central City, Westlake, Wilshire, Northeast Los Angeles, Hollywood, North Hollywood-Valley Village
GENERAL PLAN DESIGNATION	Multiple
ZONING	Multiple
COUNCIL DISTRICT	1-Cedillo, 2-Krekorian, 4-Ryu, 8-Harris-Dawson, 9-Price,
	10–Wesson, 13-O'Farrell, 14-Huizar, 15-Buscaino
LEAD CITY AGENCY	City of Los Angeles Department of City Planning
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PROJECT DESCRIPTION

The proposed Project consists of two legislative actions to transfer the land use authority from the Community Redevelopment Agency of the City of Los Angeles, Designated Local Authority (CRA/LA-DLA) to the City of Los Angeles: (1) a Resolution transferring the land use plans and functions to the City pursuant to Assembly Bill (AB) 1484 and (2) an Ordinance amending the Los Angeles Municipal Code (LAMC) to facilitate the transfer of land use plans and functions to the City, including codifying Redevelopment Plan review processes into the City's procedures for review and approval of development projects ("Project"). The proposed Project, by itself, does not propose or authorize new development or construction or ground disturbing activity. The proposed Project will authorize and establish processes for the Department of City Planning to administer the land use plans and consolidate project review of development Project Areas. The intent of the proposed Project is to ensure continuity of land use controls in the 19 unexpired Redevelopment Project Areas as the Successor Agency, CRA/LA-DLA winds down operations pursuant to Assembly Bill (AB)X1 26 (which dissolved redevelopment agencies).

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

ENVIRONMENTAL SETTING

The proposed Project consists of a Resolution and an Ordinance (Code Amendment), which applies to all developed and vacant lots within the 19 unexpired Redevelopment Project Areas. The 19 unexpired Redevelopment Project Areas encompass approximately 22 square miles, or five percent of the total land area within the City of Los Angeles (Figure 1: Project Area). The 19 unexpired Redevelopment Project Areas are generally located in the South Valley, Central Los Angeles, East Los Angeles, South Los Angeles and Harbor regions of the City, although not directly adjacent to each other, hereafter they are collectively referred to as the "Project Area." The Project Area is generally set within the urban environment and is generally within the Regional Center Commercial designated areas and major transit corridors.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None

CALIFORNIA NATIVE AMERICAN CONSULTATION

Pursuant to Public Resources Code section 21080.3.1, DCP sent letters to the following tribes:

- Fernandeño Tataviam Band of Mission Indians
- Gabrieleño Band of Mission Indians Kizh Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians

- Gabrielino-Tongva Tribe
- San Fernando Band of Mission Indians
- Soboba Band of Luiseño Indians
- Torres Martinez Desert Cahuilla Indians

No consultation was requested by the California Native American tribes listed above and in Section XVIII pursuant to Assembly Bill 52.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- □ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Giselle Joyce B. Corella

PRINTED NAME SIGNATURE

City Planning Associate

7/15/2019

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The proposed Project consists of two legislative actions to transfer the land use authority from the Community Redevelopment Agency of the City of Los Angeles, Designated Local Authority (CRA/LA-DLA) to the City of Los Angeles: (1) a Resolution transferring the land use plans and functions to the City pursuant to Assembly Bill (AB) 1484 and (2) an Ordinance amending the Los Angeles Municipal Code (LAMC) to facilitate the transfer of land use plans and functions to the City, including codifying Redevelopment Plan review processes into the City's procedures for review and approval of development projects ("Project"). The proposed Project, by itself, does not propose or authorize new development or construction or ground disturbing activity. The proposed Project will authorize and establish processes for the Department of City Planning to administer the land use plans and consolidate project review of development projects within a single entity in the City in the remaining 19 unexpired Redevelopment Project Areas. The intent of the proposed Project is to ensure continuity of land use controls in the 19 unexpired Redevelopment Project Areas (collectively known as "Project Location") as the Successor Agency, CRA/LA-DLA winds down pursuant to Assembly Bill (AB)X1 26 (which dissolved redevelopment agencies).

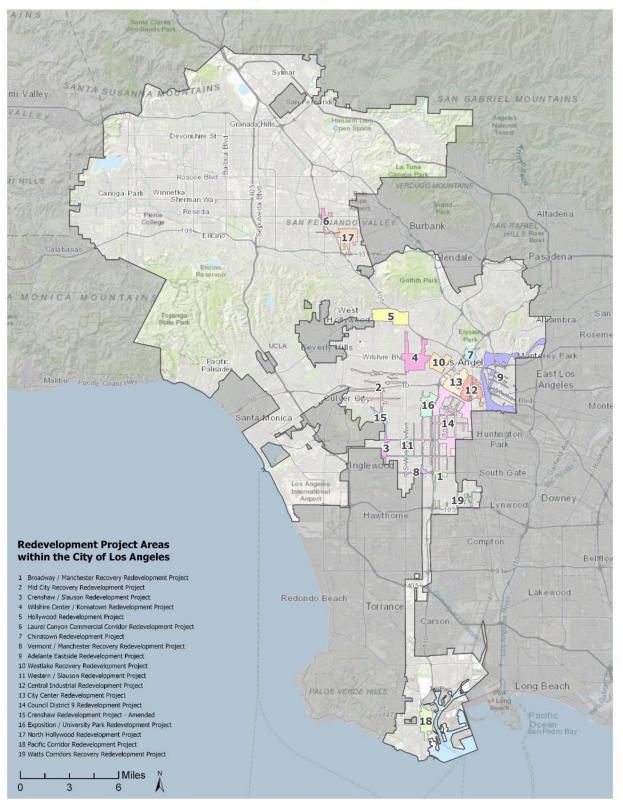
3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The proposed Project consists of a Resolution and an Ordinance (Code Amendment), which applies to all developed and vacant lots within the 19 unexpired Redevelopment Project Areas. The 19 unexpired Redevelopment Project Areas encompass approximately 22 square miles, or five percent of the total land area within the City of Los Angeles (Figure 1: Project Area). The 19 unexpired Redevelopment Project Areas are generally located in the South Valley, Central Los Angeles, East Los Angeles, South Los Angeles and Harbor regions of the City, although not directly adjacent to each other, hereafter, they are collectively referred to as the "Project Area."

For planning purposes, the City of Los Angeles (City) is divided into 35 Community Plan Areas (CPAs). These Community Plan Areas and their Plans make up the City's General Plan Land Use Element. Each unexpired Redevelopment Project Area is located within one or more CPAs throughout the City as shown in Table 1: Unexpired Redevelopment Project Areas.





Redevelopment Project Area	Redevelopment Project Area in Square Miles	Community Plan Area(s)
Adelante Eastside	3.38	Boyle HeightsNortheast Los Angeles
Broadway / Manchester Recovery	0.29	South Los AngelesSoutheast Los Angeles
Central Industrial	1.16	Central City Central City North
Chinatown	0.47	Central City Central City North
City Center	1.37	Central City
Council District 9 Corridors Recovery	4.40	South Los AngelesSoutheast Los Angeles
Crenshaw / Slauson Recovery	0.41	West Adams - Baldwin Hills - Leimert
Crenshaw	0.32	West Adams - Baldwin Hills - Leimert
Exposition / University Park	0.90	South Los AngelesSoutheast Los Angeles
Hollywood	1.77	Hollywood
Laurel Canyon Commercial Corridor	0.43	North Hollywood - Valley Village
Mid-City Recovery	1.10	 West Adams - Baldwin Hills – Leimert Wilshire
North Hollywood	1.16	North Hollywood - Valley Village
Pacific Corridor	1.07	San Pedro
Vermont / Manchester Recovery	0.25	South Los Angeles
Watts Corridors Recovery	0.38	Southeast Los Angeles
Western / Slauson Recovery	0.59	South Los Angeles
Westlake Recovery	1.00	Westlake
Wilshire Center/ Koreatown	1.88	• Westlake • Wilshire

Table 1: Unexpired Redevelopment Project Areas

3.2.2 Existing Conditions

The Project Area is within an urban environment with a majority of the lots zoned for commercial (35.38%), manufacturing (29.27%), and multi-family residential (20.97%) uses per the LAMC. There are also several other types of land uses permitted within the Project Area including public facilities (9.27%), open space (3.13%), single-family residential (1.08%), parking (0.85%), and agricultural (0.04%). Each of the 19 Redevelopment Project Areas includes a variety of zoning categories that correspond to the City's General Plan Land Use designations (i.e., Regional Center Commercial, Industrial-Transit, etc.). Additionally, some parcels within the Project Area are subject to additional land use regulations applicable to the lot including Permanent [Q] Qualified Classifications, D Development Limitations, Community Plan Implementation Overlay (CPIO) regulations. and regulations of any applicable Supplemental Use District or Specific Plan. These individual Redevelopment Project Areas have similar CRA/LA land use designations; however, the CRA/LA Land Use designations generally align with the City land use designations as required by Redevelopment Law. The following Table 2: Zoning within the Redevelopment Project Areas, includes a breakdown of the different generalized zoning categories (per the LAMC) within each of the 19 unexpired Redevelopment Project Areas.

Redevelopment Project Area	City Generalized Zoning	Total Square Footage	Percentage of Redevelopment Project Area
	Agricultural	163.19	0.00%
	Commercial	11,594,896.21	15.56%
	Manufacturing	43,746,711.34	58.71%
Adelante Eastside	Multiple Family Residential	2,275,096.68	3.05%
Adelante Eastside	Open Space	2,613,547.26	3.51%
	Parking	185,404.22	0.25%
	Public Facilities	14,045,765.51	18.85%
	Single Family Residential	52,046.19	0.07%
	Total	74,513,630.59	100.00%
	Commercial	3,611,029.97	70.70%
	Manufacturing	869,594.22	17.03%
Broadway / Manchester Recovery	Multiple Family Residential	44,226.82	0.87%
broadway / Marichester Recovery	Open Space	2,239.27	0.04%
	Public Facilities	579,813.71	11.35%
	Single Family Residential	407.61	0.01%
	Total	5,107,311.60	100.00%
	Commercial	55,596.85	0.25%
Central Industrial	Manufacturing	20,530,069.40	91.63%
Central Industrial	Open Space	14,823.48	0.07%
	Public Facilities	1,804,303.40	8.05%
	Total	22,404,793.14	100.00%
	Agricultural	8,700.40	0.09%
	Commercial	3,892,073.60	42.05%
	Manufacturing	17,920.29	0.19%
Chinatown	Multiple Family Residential	3,891,320.38	42.04%
	Open Space	114,602.32	1.24%
	Parking	4,260.91	0.05%
	Public Facilities	1,327,781.80	14.34%
	Total	9,256,659.71	100.00%
	Commercial	12,214,795.40	46.60%
	Manufacturing	8,244,660.86	31.46%
City Center	Multiple Family Residential	3,931,028.89	15.00%
	Open Space	12,866.08	0.05%
	Public Facilities	1,806,221.99	6.89%
	Total	26,209,573.23	100.00%
	Commercial	27,870,037.29	33.18%
	Manufacturing	39,258,036.14	46.74%
	Multiple Family Residential	7,035,648.79	8.38%
Council District 9	Open Space	2,196,756.23	2.62%
	Parking	183,120.49	0.22%
	Public Facilities	7,438,935.50	8.86%
	Single Family Residential	4,304.94	0.01%
	Total	83,986,839.39	100.00%
	Commercial	4,435,547.65	59.71%
	Manufacturing	839,623.42	11.30%
Crenshaw / Slauson	Multiple Family Residential	1,927,672.99	25.95%
Gionaldy / Gladboll	Open Space	11,356.28	0.15%
	Public Facilities	27,492.12	0.37%
	Single Family Residential	186,747.19	2.51%
	Total	7,428,439.65	100.00%

Table 2: Zoning within the Redevelopment Project Areas

Redevelopment Project Area	City Generalized Zoning	Total Square Footage	Percentage of Redevelopment Project Area
	Commercial	5,363,537.33	94.82%
	Multiple Family Residential	183,663.90	3.25%
Crenshaw	Open Space	44,216.99	0.78%
	Public Facilities	64,846.83	1.15%
	Single Family Residential	191.83	0.00%
	Total	5,656,456.88	100.00%
	Commercial	8,984,101.13	46.05%
	Multiple Family Residential	4,372,045.03	22.41%
Exposition / University Park	Open Space	5,673,643.51	29.08%
	Parking	107,953.14	0.55%
	Public Facilities	370,108.34	1.90%
	Total	19,507,851.14	100.00%
	Commercial	13,971,520.40	38.05%
	Manufacturing	2,102,699.85	5.73%
	Multiple Family Residential	16,518,803.90	44.99%
Hollywood	Open Space	131,019.33	0.36%
	Parking	231,690.80	0.63%
	Public Facilities	3,734,703.51	10.17%
	Single Family Residential	24,375.56	0.07%
	Total	36,714,813.33	100.00%
	Commercial	3,022,026.42	33.32%
	Multiple Family Residential	2,831,929.24	31.22%
Laurel Canyon Commercial	Open Space	236,732.84	2.61%
Corridor	Parking	1,162,978.23	12.82%
	Public Facilities	761,728.45	8.40%
	Single Family Residential	1,055,435.20	11.64%
	Total	9,070,830.38	100.00%
	Commercial	13,674,118.54	74.96%
	Manufacturing	2,436,878.98	13.36%
Mid-City Recovery	Multiple Family Residential	982,613.05	5.39%
wild only recovery	Open Space	71,722.58	0.39%
	Public Facilities	1,008,000.56	5.53%
	Single Family Residential	69,132.34	0.38%
	Total	18,242,466.05	100.00%
	Agricultural	57,239.11	0.25%
	Commercial	7,170,535.71	31.22%
	Manufacturing	2,830,661.37	12.32%
North Hollywood	Multiple Family Residential	9,830,327.52	42.80%
····· · ··· · ························	Open Space	60,303.94	0.26%
	Parking	92,084.73	0.40%
	Public Facilities	1,027,999.79	4.48%
	Single Family Residential	1,898,977.62	8.27%
	Total	22,968,129.79	100.00%
	Commercial	5,329,404.91	25.55%
	Manufacturing	1,366,365.23	6.55%
Pacific Corridor	Multiple Family Residential	10,340,132.08	49.58%
	Open Space	226,914.99	1.09%
	Public Facilities	3,108,285.37	14.90%
	Single Family Residential	484,998.30	2.33%
	Total	20,856,100.88	100.00%

Redevelopment Project Area	City Generalized Zoning	Total Square Footage	Percentage of Redevelopment Project Area
	Commercial	3,575,662.31	80.80%
	Multiple Family Residential	653,026.49	14.76%
Vermont / Manchester Recovery	Open Space	40.22	0.00%
vermont / wanchester Recovery	Parking	178,052.14	4.02%
	Public Facilities	11,956.66	0.27%
	Single Family Residential	6,685.46	0.15%
	Total	4,425,423.29	100.00%
	Agricultural	107,075.69	1.60%
	Commercial	3,023,004.18	45.20%
	Manufacturing	571,783.52	8.55%
Watts Corridors Recovery	Multiple Family Residential	1,020,755.93	15.26%
	Open Space	195,838.07	2.93%
	Public Facilities	1,708,772.65	25.55%
	Single Family Residential	60,971.93	0.91%
	Total	6,688,201.96	100.00%
	Commercial	4,725,836.39	45.06%
	Manufacturing	5,021,587.11	47.88%
Western / Slauson	Multiple Family Residential	343,132.91	3.27%
western / Stauson	Open Space	9,109.83	0.09%
	Public Facilities	14,468.79	0.14%
	Single Family Residential	374,446.46	3.57%
	Total	10,488,581.48	100.00%
	Commercial	7,440,201.06	38.60%
	Multiple Family Residential	8,841,461.01	45.86%
Westlake Recovery	Open Space	1,358,022.21	7.04%
	Parking	393,760.46	2.04%
	Public Facilities	1,243,830.37	6.45%
	Total	19,277,275.11	100.00%
	Commercial	15,695,959.87	42.31%
	Manufacturing	928,895.29	2.50%
	Multiple Family Residential	17,216,910.72	46.41%
Wilshire Center / Koreatown	Open Space	810,533.35	2.18%
	Parking	1,210,985.01	3.26%
	Public Facilities	698,934.79	1.88%
	Single Family Residential	533,447.36	1.44%
Source: Department of City Planning, GIS Divisio	Total	37,095,666.39	100.00%

Source: Department of City Planning, GIS Division

As the Project Area is located within the context of an urban environment, almost all of the lots are developed and have existing building structures. By way of background, the former CRA/LA was established in 1948 and until 2012, when ABX1 26 dissolved redevelopment agencies throughout California, the former CRA/LA developed, implemented, and updated the Redevelopment Plans. The former CRA/LA existed primarily to spur economic development within the City so many of these Redevelopment Project Areas were often in the City's major corridors and Regional Center Commercial areas facilitating development of a mix of uses including affordable housing, increasing job and economic opportunities, and improving mobility and transit connections. Since 1948, these Redevelopment Plans coexisted with the City's regulations and catalyzed redevelopment in neighborhoods throughout the City.

The total square footage of new construction projects, demolitions, and additions from 2008-2018 for each of the 19 unexpired Redevelopment Project Areas is displayed in the following Table 3: Permits Issued in Redevelopment Project Areas by Permit Type (2008-2018). The square

footages are based on building permit data provided by the Los Angeles Department of Building and Safety. As shown in Table 3, each of the Redevelopment Project Areas experienced a net increase in square footage of development, with the exception of the Crenshaw Redevelopment Project Area, which saw a decrease in net new square footage. Consistent with the development trends throughout the City, the Redevelopment Project Areas with the highest total of net new construction are portions of the City with the highest concentrations of people, housing and employment centers (i.e., City Center, Hollywood, and Wilshire Center/ Koreatown).

		Permit Type					
Redevelopment Project	Redevelopment Project Area Size (sq. mi.)	Bldg- Demolition (sq.ft.)	Bldg-New (sq.ft.)	Bldg- Addition (sq.ft.)	Net New Construction and Addition Total (sq.ft.)		
Adelante Eastside	3.38	-1,630,506	2,502,245	179,743	1,051,482		
Broadway / Manchester Recovery	0.29	-63,698	179,861	6,139	122,302		
Central Industrial	1.16	-590,892	2,360,656	31,816	1,801,580		
Chinatown	0.47	-75,329	1,466,740	22,897	1,414,308		
City Center 64	1.37	-617,557	14,335,042	2,261	13,719,746		
Council District 9	4.40	-1,034,363	4,413,808	375,894	3,755,339		
Crenshaw / Slauson	0.41	-277,021	300,515	8,591	32,085		
Crenshaw	0.32	-312,515	279,304	21,730	-11,481		
Exposition / University Park	0.90	-687,796	4,094,571	51,898	3,458,673		
Hollywood	1.77	-927,251	11,276,090	135,355	10,484,194		
Laurel Canyon Commercial Corridor	0.43	-111,572	209,110	151,261	248,799		
Mid-City Recovery	1.10	-256,368	1,739,313	33,048	1,515,993		
North Hollywood	1.16	-633,778	3,396,991	29,683	2,792,896		
Pacific Corridor	1.07	-61,984	385,195	10,036	333,247		
Vermont / Manchester Recovery	0.25	-73,212	147,452	4,347	78,587		
Watts Corridors Recovery	0.38	-13,048	124,199	1,489	112,640		
Western / Slauson	0.59	-131,721	184,591	-1,513	51,357		
Westlake Recovery	1.00	-163,161	1,069,989	26,156	932,984		
Wilshire Center / Koreatown	1.88	-787,116	5,996,163	235,396	5,444,443		
Total	22.33	-8,448,888	54,461,835	1,326,227	47,339,174		

Table 3: Permits Issued in Redevelopment Project Areas (2008 - 2018)

Source: LADBS

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The proposed Project consists of two legislative actions to transfer the land use authority from the Community Redevelopment Agency of the City of Los Angeles, Designated Local Authority (CRA/LA-DLA) to the City of Los Angeles: (1) a Resolution transferring the land use plans and functions to the City pursuant to Assembly Bill (AB) 1484 and (2) an Ordinance amending the Los Angeles Municipal Code (LAMC) to facilitate the transfer of land use plans¹ and functions² to the City, including codifying Redevelopment Plan review

As defined in the proposed Resolution, "land use related plans" of the Former Agency mean only those provisions of the Redevelopment Plans and Guidelines that govern land use or development, including, but not limited to, provisions that establish allowable land uses, land use restrictions, controls, processes or procedures, Designs for Development and Design Guidelines (collectively, the "Land Use Provisions" or "Redevelopment Regulations")

As defined in the proposed Ordinance, "functions" shall mean functions which allows the City to apply the Land Use Provisions to the Project Areas and undertake related activities including: updating and amending the Land Use Provisions or performing any other actions pursuant to State law; adopting and updating the General Plan, Community Plans, policies and other rules, regulations, and guidelines governing design,

processes into the City's procedures for review and approval of development projects ("Project"). The proposed Project, by itself, does not propose or authorize new development or construction or ground disturbing activity. The proposed Project will authorize and establish processes for the Department of City Planning to administer the land use plans and consolidate project review of development projects within a single entity in the City in the remaining 19 unexpired Redevelopment Project Areas. The intent of the proposed Project is to ensure continuity of land use controls in the 19 unexpired Redevelopment Project Areas as the Successor Agency, CRA/LA-DLA winds down pursuant to Assembly Bill (AB)X1 26.

Based on the above, the Project will not have direct impacts on the physical environment. The Project will be analyzed for its reasonably foreseeable indirect impacts.

The dissolution of the CRA/LA, became effective on February 1, 2012, resulting in an end to redevelopment activities by the Agency and a significant reduction in staff to administer the Redevelopment Plans, which included reviewing development proposals for consistency with Redevelopment Plans. Additionally, the principle focus of the CRA/LA-DLA by legal mandate is to wind down operations. It is expected that the transfer of the redevelopment land use plans and functions to the City, as authorized by State law, will better ensure the continued implementation of the 19 unexpired Redevelopment Plans. The CRA/LA-DLA will continue to have authority and responsibility over enforceable obligations³ consistent with State Law, including those in the 19 unexpired Redevelopment Project Areas. The proposed Project will not affect the land use plans and functions of the 19 unexpired mandate plans.

The proposed actions do not change or amend any redevelopment land use provisions of any of the existing 19 unexpired Redevelopment Plans. The proposed actions are limited to the following:

- 1) Authorize the City to administer the 19 unexpired Redevelopment Plans by resolution;
- 2) Establish procedures in the Los Angeles Municipal Code (LAMC) to implement the 19 unexpired Redevelopment Plans; and
- Clarify references to the former CRA/LA in the LAMC to facilitate the implementation of the 19 unexpired Redevelopment Plans by the Department of City Planning and other City departments.

The intent of the proposed Project is to implement the 19 unexpired Redevelopment Plans with the same level of review that currently exists under the purview of the CRA/LA-DLA. The proposed Project is not intended to change the substantive requirements or level of review for development projects for any of the existing land use provisions in the 19 unexpired Redevelopment Plans. If the City were to propose any substantive land use provision changes or changes to the level of review of the unexpired Redevelopment Plans, a separate action with the appropriate environmental clearance would be prepared

signs, open space, streets, utilities, land use, or development within the Project Areas; and promulgating administrative guidelines to interpret and implement the Land Use Provisions.

³ As defined in Health and Safety Code Section 34171 (as amended by AB 1484)

to convey how the proposed changes could potentially affect the environment. Further, since the proposed Project does not change any existing redevelopment land use provisions, or the level of review of proposed development projects within the Project Area, it is not reasonably foreseeable that the proposed resolution and ordinance will result in different development patterns or building types. The proposed Project is not anticipated to increase development or construction as the redevelopment land use provisions will continue to be subject to individual project review. Continuation of individual project review ensures conformance with the land use provisions of the unexpired Redevelopment Plans and is consistent with the existing level of project review done by the CRA/LA-DLA and in accordance with CEQA guidelines.

During the proposed Project's public review period, members of the public and interested parties commented that the proposed Project would have reasonably foreseeable indirect impacts to the physical environment. The comments were focused on the following issues: (1) less protection of historical resources than currently protected by the CRA/LA-DLA under settlement agreements, Redevelopment Plan language, or mitigation measures; (2) various impacts resulting from the CRA/LA-DLA losing its land use authority, including where necessary, to enforce adopted former CRA/LA mitigation measures; and (3) impacts resulting from the application of Transit Oriented Communities (TOC) Affordable Housing Incentive Program in certain Redevelopment Project Areas. The following analysis is intended to address the City's project assumptions relied upon for the analysis in this Initial Study/Negative Declaration in relation to the above comments.

1) Historical Resources

Hollywood Heritage, Inc., as well as its legal counsel, submitted several comment letters arguing that the transfer of land use authority to the City will result in impacts to historical resources.

Upon transfer, the City will continue to review all permits (including those issued by the Department of Building and Safety for building or demolition permits) affecting designated and identified historical resources to meet the goals for preserving historical resources as identified in each Redevelopment Plan and reserves all powers the CRA/LA had to protect historical resources under its land use plans and functions. The review of all permits affecting City Historic-Cultural Monuments will continue to be reviewed by the City's Cultural Heritage Commission, staffed by the Department of City Planning's Office of Historic Resources (OHR). All permits for properties listed in or determined eligible for listing in the National Register of Historic Places, including properties in the Hollywood Boulevard National Register District, will continue to be referred to the OHR for review and permit clearances, in accordance with LAMC Section 91.106.4.5. All resources identified as appearing eligible in a historic resources survey of the Redevelopment Project Area. with status codes of 3 or 5, will continue to be treated as presumptive historical resources under CEQA, including historic resources surveys adopted by the former CRA/LA. Permit clearances for these properties will continue to be reviewed for conformance with the applicable Redevelopment Plan, with reviews conducted by qualified professional staff in the OHR. Additionally, properties that have not previously been identified in a survey or are not considered eligible for listing or designation, but are otherwise determined to be historically significant by the OHR based on substantial evidence, will be considered for the purposes of complying with CEQA Guidelines Section 15064.5 and the

Redevelopment Plan. Finally, the City will implement CRA mitigation measures as discussed below.

The OHR has been allocated one additional staff position expressly for the purpose of supplementing its capacity to conduct reviews of presumptive historical resources within Redevelopment Project Areas. The Department of City Planning also intends to maintain CRA/LA-DLA's current protocol for notifying Hollywood Heritage on demolition permits.

2) Mitigation Measures

The Project is not expected to change the implementation of the CRA's adopted mitigation measures, either for projects or adopted plans. The City has reviewed numerous Mitigation Monitoring Programs (MMPs) or Mitigation Monitoring and Reporting Programs (MMRPs) adopted by the former CRA/LA and CRA/LA-DLA, including MMPs and MMRPs for both development projects and Redevelopment Plans, including but not limited to the Metropolis Mixed-Use Project, Sunset and Gordon Mixed-Use Project, and the Hollywood Redevelopment Plan (2003). Almost all MMPs or MMRPs for development projects identify City Departments as the enforcing or monitoring agency, including the Los Angeles Department of Building and Safety (LADBS), the Los Angeles Department of Transportation (LADOT), and the Los Angeles Bureau of Engineering (BOE). For these mitigation measures, it is not reasonably foreseeable that the proposed Project will have any effect on the implementation of those measures. For the Plan EIR, the MMRP identified the CRA as the implementing agency. For these measures and any development project measures that do not identify the City as an implementing, enforcing or monitoring agency, if the measure falls within a traditional land use function, it is the City's intention to continue to implement the mitigation measure under the authorities provided to the City by the Project. As identified in the proposed Resolution to be adopted as part of the proposed actions of the Project, the City will develop guidelines to monitor and enforce mitigation measures. Consequently, there is no basis to find that the proposed Project, in relation to the former CRA/LA's adopted mitigation measures, will result in reasonably foreseeable indirect impacts from the transfer of land use authority from CRA/LA-DLA to the City. While the Draft Hollywood Community Plan EIR has expressed an intent to delete the mitigation measures for the Hollywood Redevelopment Plan, this is a draft plan and the City is not required to analyze impacts from a draft plan. To the extent that the City seeks to delete or modify any mitigation measures that fall within the land use functions of the CRA/LA-DLA, the City will need to comply with the requirements of CEQA, including but not limited to, identifying why the measure is no longer feasible and analyzing whether the deletion or modification will result in a significant impact to the environment, and if it will result in a significant impact, preparing the necessary environmental clearance

3) Transit Oriented Communities Affordable Housing Incentive (TOC) Program

On June 27, 2018, the CRA/LA-DLA issued a memorandum that concluded specific Redevelopment Plans' density limitations are not superseded by voter approved Measure JJJ and the implementing TOC Ordinance. Subsequently, on January 9, 2019, the City memorialized in a memorandum that it does not currently intend to take any specific action regarding the application of the TOC program in the specified Redevelopment Project Areas. The proposed Project does not propose to modify the Redevelopment Plans to allow the use of the TOC program where not currently permitted by the CRA/LA-DLA, nor does it make an interpretation on the density limitations that is inconsistent with that of the

CRA/LA-DLA. Applying the TOC program to development projects within the specified Redevelopment Project Areas with density limitations that are inconsistent with CRA/LA-DLA's current practice will require subsequent legislative action and is not part of the proposed Project at this time and has not been initiated or planned. While there has been some interest expressed by the development community, including at the PLUM hearing on this Project, in taking steps or actions to allow TOC in the Project area after this Project is approved and some City staff or officials may have expressed interest in exploring how that may be done, there is no work program or official action that has been taken by the City Council, the Director of the Planning Department, or any other City official or body at this time to take any step towards using TOC in the Project areas inconsistent with the CRA/LA-DLA interpretation. As such, it is not reasonably foreseeable that this Project will result in a change to the use of TOC in the Project area.

CRA/LA-DLA has reviewed a number of TOC projects since the adoption of the TOC Ordinance for conformance with the associated Redevelopment Plan. Each of these TOC projects have their own individual environmental clearances in accordance with CEQA. With the proposed Project, DCP will continue to interpret the TOC Ordinance's applicability in accordance with CRA/LA-DLA's current practice and as stated in CRA/LA-DLA's memorandum dated June 27, 2018. TOC is a program to allow density increases and waiver of development standards for residential projects providing affordable housing that is consistent with, and implementing, Measure JJJ and the City's Density Bonus law. The TOC program consists of four tiers of density increases ranging from 50% to 80% and floor area increases ranging from 40% or at least 2.75:1 up to 55% or 4.25:1. While the TOC program allows increases in the City's base density, it is possible in certain areas of the City, including those redevelopment project areas listed in CRA/LA-DLA's memorandum dated June 27, 2018 with CRA density limitations, that a proposed development project could utilize TOC and stay at or below the CRA density and FAR limitation. Certain redevelopment plans allow as much as 80 to 130 dwelling units per gross acre and an additional 30% density increase depending on the CRA's designated land use⁴. As such, it is possible that a TOC project could stay within the CRA's density limitations because CRA's method for calculating density is by gross acre and includes portions of a street or alley, and/or, any of the City's Q Conditions could further limit the City's base density of a site, making the CRA's base density higher. Therefore, a proposed TOC project within the specified Redevelopment Project Areas would not be prohibited on the basis that it is a TOC project if it conforms to the applicable redevelopment plan. It would be speculative to analyze the scope or amount of development under the TOC program in the specified Redevelopment Project Areas as the Project does not propose any changes to the land use provisions for the redevelopment plans or any other legislative action related to the use of TOC in the Project area or inconsistent interpretations of those land use provisions then that of the CRA/LA-DLA.

⁴ The Hollywood Redevelopment Plan

CRA Transfer of Land Use Authority Initial Study/ Negative Declaration

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to Section 558 of the Los Angeles City Charter, a Resolution transferring the land use authority of the Community Redevelopment Agency of the City of Los Angeles, Designated Local Authority (CRA/LA-DLA) to the City of Los Angeles.
- Pursuant to LAMC Section 12.32(C)(7), an Ordinance amending the LAMC to establish procedures to implement the redevelopment land use provisions and facilitate the transfer of land use authority from the CRA/LA-DLA.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

-	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public				
Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?				\boxtimes
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				\boxtimes
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? 				\boxtimes

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

No Impact. A scenic vista is generally defined as a public view of highly valued visual and scenic resources exhibiting a unique or unusual feature, such as mountains, hillsides, bodies of water and/or urban skylines. A scenic vista may also be a particular distant view that provides visual relief from less attractive nearby features. Designated federal and state lands, as well as local open space or recreational areas, may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape. Examples of local scenic views include public views of the Pacific Ocean and the Santa Monica Mountains.

The Project Area is located within the context of an urbanized area. In general, the Project Area is developed with commercial, manufacturing, multiple-family residential, public facilities, open space, single-family residential, parking and (some) agricultural uses.

The Project would have no impact on a scenic vista as it does not authorize or propose any development. The Project establishes the procedures to implement the Redevelopment

Regulations⁵. Overall, the densities and intensities of future development remain the same as no changes to density, height or floor area ratios (FAR) are proposed through the Ordinance. It is expected that development will continue to occur in the Project Area including additions, rehabilitations, demolitions, and/or new construction.

It is not reasonably foreseeable that there would be a substantially adverse effect on a scenic vista as a result of the Project. The City will review development proposals for consistency with the Redevelopment Plans providing more oversight of scenic vistas than currently exists since CRA/LA DLA is understaffed. Therefore, the Project would have no impact as it would not block or otherwise impede an existing public view of a scenic vista. No further analysis is needed.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. A designated state scenic highway generally consists of a scenic corridor that is comprised of memorable landscape that showcases the natural scenic beauty or agriculture of California with minimal visual intrusions. Within the City of Los Angeles there are two designated state scenic highways, the Arroyo Seco Historic Parkway, (also known as the Pasadena Freeway SR0110) and the recently designated Topanga Canyon State Scenic Highway (SR-27). There are no designated state scenic highways within the Project Area. As mentioned, the Project does not propose any development, construction, or ground disturbing activity, nor does it propose to amend any Redevelopment Regulations or reduce the level of individual project review. Therefore, there is no basis to find the proposed amendments will indirectly result in different development patterns or building types. The proposed Project will consolidate project review within a single entity, the City. Thus, no impact would occur to scenic resources within a state scenic highway.

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

No Impact. Significant impacts to the visual character of a site and its surroundings are generally based on the removal of features with aesthetic value, the introduction of contrasting urban features into a local area, and the degree to which the elements of the proposed Project detract from the visual character of an area.

The Project is transferring the land use authority of the CRA/LA-DLA to the City and establishing implementation procedures, it does not propose or authorize development. The Project is not anticipated to induce construction as the Project itself does not incentivize or remove levels of individual project review or modify existing Redevelopment Regulations. Therefore, the Project would not alter the visual character or quality of the site and its surroundings. Additionally, any

⁵ Redevelopment Regulations shall mean all the land use provisions of the Redevelopment Plans and design or development guidelines adopted pursuant to such Redevelopment Plans that govern land use or development that were transferred to the City pursuant to the proposed Ordinance (e.g., provisions that establish required or allowable land uses, density, lot area, floor area ratio, height of Buildings or Structures, setbacks, yards, buffers, parking, drainage, fences, landscaping, lighting, trash enclosures, and signage), including required processes or procedures (e.g., requirements regarding the imposition of conditions, the making of findings or the holding of hearings).

Redevelopment Plan Project⁶ will continue to be subject to the respective Redevelopment Plan provisions and Design Guidelines or Design for Development (collectively known as "DFD") and other Redevelopment land use provisions. Therefore, there is no impact, no further analysis is required.

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

No Impact. Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective building cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The proposed Project is limited to: the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. Additionally, the Project Area is generally set within an urbanized environment with existing levels of ambient nighttime lighting, including streetlights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures that passes through windows) and automobile headlights.

Development will continue to occur in the Project Area including demolition and modifications to existing structures and new development. These uses either are currently producing some light (as in the case of existing commercial, multiple-family residential and mixed-use buildings) or would generally be located in areas that are developed and well lit. Further, existing allowable uses would not be expected to emit large amounts of nighttime lighting or glare as all development projects are required to comply with provisions of the LAMC in this regard. In any case, the Project is not expected to result in new development. There would be no impacts and no further analysis is required.

⁶ Redevelopment Plan Project shall mean any proposed activity within a Redevelopment Project Area with an unexpired Redevelopment Plan that includes the issuance of a building, grading, demolition, sign or change of use permit, provided that a Redevelopment Plan Project shall not include activity that consists solely of interior remodeling, interior rehabilitation or interior repair work. Notwithstanding the above, all projects involving the following shall be considered a Redevelopment Plan Project: (i) A Historic Resource including interior remodeling, interior rehabilitation, or interior repair work that affects the exterior; and/or (ii) A Residential Hotel/Single Room Occupancy Hotel (SRO), vacant Dwelling Unit, or a Dwelling Unit housing Lower Income Households in the City Center Project Area and the Central Industrial Project Area including interior remodeling, interior rehabilitation or interior remodeling unit.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				\boxtimes
C.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
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?				

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

No Impact. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Area is not included in the Important Farmland category⁷. Furthermore, no parcels located in the Project Area are categorized as Farmland on a state map as the Project Area is located in an urbanized environment. Therefore, implementation of the proposed Project would not convert State mapped farmland to non-agricultural use. No impacts would occur, and no further analysis is required.

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

No Impact. As mentioned **Section II (a)** above, the there is only 0.04% land in the project area currently zoned agriculture use and it is surrounded by urban uses and not usable for commercial farming. Additionally, no zone changes are currently proposed. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. The Project Area does not contain any lands covered by a Williamson Act contract. Therefore, the proposed Project would not conflict with existing agricultural zoning or a Williamson Act Contract. No impacts would occur and no further analysis is required.

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

No Impact. The Project Area primarily consists of commercial, manufacturing, residential, public facilities, and open space uses. The Project Area and the surrounding areas do not contain any forest land, timberland, or land zoned for timberland production⁸. The proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. No impacts would occur and no further analysis is required.

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

No Impact. See response to **Section II (c)** above. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."⁹ 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."¹⁰ A variety of street trees are located throughout the Project Area, along the parkways adjacent to public and

⁷ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland Mapping, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed April 2, 2019.

⁸ City of Los Angeles General Plan, Conservation Element, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed April 2, 2019.

⁹ California Public Resources Code Section 12220[g]

¹⁰ California Public Resources Code Section 4526

private property, but are largely ornamental. There is no forest land or timberland in the Project Area. No impacts would occur and no further analysis is required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. See responses to **Sections II (a)** through **(d)** above. The Project, by itself, does not propose or authorize development and is limited to: the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the Former CRA/LA in the LAMC. No changes of land use or zoning is proposed, therefore, no impacts would occur that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use, no further analysis is required.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?				\boxtimes	
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?					
c. Expose sensitive receptors to substantial pollutan concentrations?				\boxtimes	
 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? 				\boxtimes	

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

No Impact. The City of Los Angeles is entirely within the South Coast Air Basin (SCAB) and is subject to the Air Quality Management Plan (AQMP) prepared by the SCAQMD. The SCAQMD has adopted a 2016 AQMP that focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG)¹¹.

The Project by itself, does not propose or authorize development nor does it authorize or expand any new or existing land uses. All proposed development projects located within the Project Area are currently reviewed under the CRA/LA-DLA's individual project review process and would be subject to their own environmental review by the City.

The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. It is anticipated that development will continue to occur in the Redevelopment Project Areas, however, because no zoning or land use changes are proposed and no changes to the level of individual project review is proposed, new construction is not expected to exceed levels that would occur under the existing CRA/LA-

¹¹ South Coast Air Quality Management District, Final Air Quality Management Plan; http://www.aqmd.gov/docs/default-source/clean-air-plans/airquality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15, April 9, 2019.

DLA approval process and LAMC zoning. Additionally, new construction of residential and mixeduse developments participating in state programs are expected to be consistent with the existing pace of similar development projects, such as those participating in State Density Bonus Law which offers incentives or concessions for the construction of affordable housing. The Project is not anticipated to significantly induce construction or otherwise alter development patterns in the Project Area, therefore, it is not reasonably foreseeable that the proposed Project will cause additional impacts to air quality as no development or construction is proposed, incentivized or dis-incentivized. Since the Project Area is located in an urbanized environment with existing residential, commercial, and industrial buildings, traffic impacts would have already been included in the AQMP. Therefore, the Project does not conflict with the applicable air quality plan or obstruct implementation of the applicable air quality plan. No impacts would occur.

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

No Impact. As described above in **Section III (a)**, the Project Area is located in an urbanized environment with existing public facilities, residential, industrial, and commercial buildings, traffic impacts that would have been included in the AQMP. Therefore, the Project itself, does not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under federal or state ambient air quality standard. No impacts would occur.

c) Expose sensitive receptors to substantial pollutant concentrations?

No Impact. A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant¹². According to the SCAQMD, land uses where sensitive receptors are typically located include: schools, playgrounds, and childcare centers; long-term health care facilities; rehabilitation centers; hospitals; retirement homes; and residences. As described above in **Section III (a)** and **(b)**, the Project does not propose or authorize development, nor does it change any existing land uses. The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project is not anticipated to significantly induce construction or otherwise alter development patterns in the area or the City, therefore, it is not reasonably foreseeable that the proposed Project would expose sensitive receptors to substantial pollutant concentrations.

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

No Impact. According to the SCAQMD, land uses and industrial operations that are associated with odor complaints include agricultural uses, chemical plants, composting operations, dairies,

¹² South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning; http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4, April 9, 2019.

fiberglass molding, landfills, refineries, rendering plants, rail yards and wastewater treatment plants¹³.

The proposed Project, by itself, would not authorize or propose any development. The implementation of the proposed Project by itself would not generate objectionable odors affecting a substantial number of people. Under the proposed Project, development projects would still be subject to individual development project review and subject to any existing Redevelopment Regulations regarding odors or other emissions. Impacts related to odors in the Project Area would generally be due to construction activities and would be typical of most construction sites. Additionally, the odors from the construction of individual development projects would be temporary and the construction activity would be required to comply with SCAQMD Rule 402¹⁴. No impact relative to an odor nuisance would occur as a result of the Project as the Project does not propose or authorize development or reasonably foreseeable induce construction or ground disturbing activities.

¹³ South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning; http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4, April 9, 2019.

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

IV. BIOLOGICAL RESOURCES

Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
		\boxtimes	
		\boxtimes	
			\boxtimes
			\boxtimes
			\boxtimes

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. Habitats are natural and/or artificial environments that support the survival of wild animals and native plants. Five habitat types have been identified by the City¹⁵. These habitat types include Inland habitats, Significant Ecological Areas (SEA), Wildlife Corridors, Ocean, and Coastal Wetlands.

The Project Area is in an urbanized setting and is not generally within the vicinity of Inland habitats, SEAs, Wildlife Corridors, Ocean or Coastal Wetlands. The proposed Project does not propose to change any existing land uses or authorize any new development in the habitat areas identified above, or expand any new or existing allowable land uses. As such, the proposed Project would not directly or indirectly affect any special status species and would not modify any special status species habitat.

Species expected to occur within the Project Area would be limited to terrestrial species (such as squirrel, opossum, or gopher) and birds that are commonly found in, and are tolerant of, urban environments. Therefore, the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. No impacts would occur and no further analysis is required.

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

Less Than Significant Impact. Some riparian habitats or other sensitive natural community exists within the Project Area¹⁶. Riparian habitats or riparian areas are generally plant communities contiguous to and affected by surface and subsurface hydrologic features of perennial or intermittent lotic and lentic water bodies (rivers, streams, lakes, or drainage ways); usually transitional between wetland and upland; and have one or both of the following characteristics: distinctly different vegetative species than adjacent areas and species similar to adjacent areas but exhibiting more vigorous or robust growth forms¹⁷. As the Project Area consists of varying urban typographies citywide, some portions of the 19 unexpired Redevelopment Project Areas are within or adjacent to, some riparian areas such as the Los Angeles River and MacArthur Park Lake. However, the proposed Project is limited to: the transfer of land use authority of the CRA/LA-DLA to the City; the establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references in the LAMC, it does not propose or authorize development, nor is it reasonably foreseeable that it will induce or disincentivize (and

¹⁵ City of Los Angeles General Plan, Conservation Element, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed April 4, 2019.

¹⁶ US Fish and Wildlife Service National Wetlands Inventory, Wetlands Data Mapper, https://www.fws.gov/wetlands/data/Mapper.html, accessed April 4, 2019.

¹⁷ US Fish and Wildlife Service National Wetlands Inventory, Riparian Product Summary, https://www.fws.gov/wetlands/Other/Riparian-Product-Summary.html, accessed April 8, 2019.

displace) development as the level of review of individual projects within the Redevelopment Project Areas will remain the same.

Implementation of the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service. Therefore, less than significant impacts would occur and no further analysis is required.

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

Less Than Significant Impact. As discussed in Section IV (b), there are some wetlands located within the Project Area. There are two categories of wetlands, coastal/tidal wetlands and inland/non-tidal wetlands. Inland/non-tidal wetlands are most common on floodplains along rivers and streams (riparian wetlands), in isolated depressions surrounded by dry land (for example, playas, basins and "potholes"), along the margins of lakes and ponds, and in other low-lying areas where the groundwater intercepts the soil surface or where precipitation sufficiently saturates the soil (vernal pools and bogs)¹⁶. A significant impact would occur if federally protected wetlands would be modified or removed by a development project. The proposed Project, by itself, does not propose or authorize any development, nor does it propose or modify Redevelopment Regulations or City regulations that would adversely affect federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, less than significant impacts would occur and no further analysis is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. Wildlife corridors are land segments that connect two or more large habitat areas and provide a habitat for movement of animals between those areas. The Project Area is located within the context of an urbanized environment generally in the City's multi-family residential, commercial and manufacturing zoned areas, therefore, no wildlife corridors, or native wildlife nursery sites are located within the Project Area. However, a number of mature trees are scattered within the Project Area and may provide suitable habitat, including nesting habitat, for migratory birds.

The Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, selling, purchasing, and bartering of any migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA.

Construction activities that occur pursuant to the proposed Project would be required to comply with the provisions of the MBTA. The Project itself does not propose or authorize development

¹⁸ United States Environmental Protection Agency, Wetlands, https://www.epa.gov/wetlands/what-wetland, accessed April 23, 2019.

and is not expected to induce development or otherwise alter existing development or development patterns, therefore, no impacts would occur and no further analysis is required.

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

No Impact. The Project does not propose or authorize development, nor does it change any existing land uses so it would not conflict with any local polices or ordinances protecting biological resources such as a tree preservation policy or ordinance. The City's Protected Tree Ordinance No. 177,404 (Chapter IV, Article 6 of the Los Angeles Municipal Code), defines protected trees as:

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

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

There are a number of trees located along roadways and on private property within the Project Area that may potentially meet the requirements of the City's Protected Tree Ordinance. The Project by itself does not propose or authorize any development and is not expected to induce development or otherwise alter existing development or development patterns. Construction activities that occur pursuant to the Project would be required to comply with the City's Protected Tree Ordinance.

Additionally, there is a proposed code amendment ordinance (Planning Case file number: CPC-2016-4520-CA) to include native shrub species in the definition for a "Protected Tree and Shrub" which would include the Mexican Elderberry (Sambucus Mexicana) and Toyon (Heteromeles arbutifolia). Although the proposed code amendment ordinance has not been adopted, any subsequent code amendments to include additional Protected Trees and Shrubs would also be considered, thus, compliance with the City's existing Protected Tree Ordinance would ensure no impacts to protected trees and no further analysis is required.

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

No Impact. The City does not have any adopted Habitat Conservation Plans.

V. CULTURAL RESOURCES

-	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
 Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? 			\boxtimes	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?				\boxtimes
c. Disturb any human remains, including those interred outside of dedicated cemeteries?				\boxtimes

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

Less Than Significant Impact. According to California Public Resources Code (PRC) Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Pursuant to Section 15064.5 of the State CEQA Guidelines, a "historical resource" is defined as:

- A resource listed in or determined to be eligible for listing in the California Register of Historical Resources;
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g), are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant;
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852); and
- The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or identified in an historical resources survey meeting the criteria set forth in subdivision (g) of Section 5024.1 does not preclude a lead agency from determining

whether the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

The proposed Project, which consists of a Resolution and an Ordinance (code amendment) includes a definition of a "Historic Resource"¹⁹ to further clarify when Redevelopment Plan Projects require additional individual project review. The former CRA/LA prepared Historic Resources Surveys and additional historical resources may be identified and included in SurveyLA.²⁰ Therefore, if a proposed development project is on a site identified in any of the former CRA/LA Historic Resources Surveys the City will presume it a Historic Resource or historical resource for the purpose of complying with CEQA and require Redevelopment Plan Projects to incorporate mitigation measures as required, absent substantial evidence the resource does not meet the criteria for listing on the state or local register (e.g., the resource has lost integrity).

Under the City's Cultural Heritage Ordinance, local buildings and sites that meet the criteria for designation can be declared "Historic-Cultural Monuments" (HCMs) by the City Council after recommendation from the Cultural Heritage Commission. The City also has a Historic Preservation Overlay Zone (HPOZ) Program (commonly known as historic districts) to provide for review of proposed exterior alterations and additions to historic properties within these designated historic districts. There are 35 adopted HPOZs in various neighborhoods citywide, however, only small portions of HPOZs are located within the Project Area boundaries.²¹ Portions of the Jefferson Park, Country Club Park, and Vinegar Hill HPOZs are located within the Mid-City Recovery, Wilshire Center/Koreatown and Pacific Corridor Redevelopment Project Areas, respectively.

Further, future activity within the Project Area that includes the issuance of a building, grading, demolition, sign or change of use permit on sites with identified resources as listed in CRA/LA Historic Resources Surveys or SurveyLA, or contain a designated HCM, or is within the boundaries of an HPOZ, would need to comply with the respective regulations and permit clearance procedures outlined in each Redevelopment Plan. Any future development project would also need to comply with other applicable ordinances and provisions of the LAMC and any applicable mitigation measures, including applicable Redevelopment Plan mitigation measures.

As previously stated, in CEQA Guidelines Section 15064.5, properties that have not been previously identified in a City recognized historic resources survey or are not considered eligible for listing or designation, may be treated as historical resources if substantial evidence is submitted to the City's Office of Historic Resources that the resource is a historical resource under the CEQA Guidelines.

The Project by itself, does not include any proposed development or modifications to any existing structures or changes to existing project review procedures in the Project area. As discussed, the proposed Project is not expected to induce development or otherwise alter existing development or development patterns. As such, there is less than significant potential for historical resources

¹⁹ Historic Resource shall mean designated or surveyed resources including properties listed in or formally determined eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, locally designated Historic-Cultural Monuments (HCMs) and Historic Preservation Overlay Zones (HPOZs); and properties identified as significant per eligibility criteria in SurveyLA and the Community Redevelopment Agency surveys or any subsequent City sanctioned or accepted surveys.

Department of City Planning Office of Historic Preservation, https://preservation.lacity.org/surveyla-findings-and-reports, accessed April 17, 2019
 Department of City Planning Office of Historic Preservation, http://preservation.lacity.org/, accessed April 17, 2019.

to be affected by the proposed Project. Therefore, impacts to historical resources would be less than significant. No further analysis is required.

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

No Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which meet the criteria for unique archaeological resources. Pursuant to State CEQA Guidelines Section 15064.5 (c)(3), if an archaeological site does not meet the criteria defined in subdivision (a), but does meet the definition of a unique archeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

The Project does not propose or authorize any development and is not expected to induce development or otherwise alter existing development or development patterns. No impact would occur as a result of the Project, therefore, no further analysis is required.

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

No Impact. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project does not propose or authorize development or ground disturbing activities. Future development that would occur in the Project Area would be required to comply with California Health and Safety Code Section 7050.5, Public Resource Code 5097.97, and CEQA Guidelines Section 15064.5(e) to address the handling of human remains. No human remains would be disturbed as a result of the implementation of the proposed Project, therefore, no impact would occur and no further analysis is required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				\boxtimes

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

No Impact. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. As the proposed Project does not consist of a development project, there is no construction activity and consequently no activity associated with the operation of a structure. The proposed Project is not expected to induce development or alter existing development patterns. Future development to occur subsequent to the adoption of the proposed Project would be subject to the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Standards Code. The LAGBC serves as the mechanism to regulate and reduce a building's energy use, water use and overall carbon footprint. As the Project is not proposing any development or modifications to the existing land use plans of the unexpired Redevelopment Plans, it is not reasonably foreseeable that there would be a significant direct or indirect effect to the environment due to wasteful, inefficient, or unnecessary consumption of energy resources. No impact would occur; no further analysis is needed.

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

No Impact. A significant impact would occur if the Project were to conflict or obstruct a state or local plan for renewable energy or energy efficiency. The California Energy Commission²² is the state's primary energy policy and energy planning agency responsible for assessing California's energy systems and trends as well as a generating information resulting in renewable energy and energy efficiency promoting policies. There are several state legislation promoting renewable energy and energy and energy efficiency including but not limited to: Senate Bill (SB) 350 Clean Energy and Pollution Reduction Act (2015), Assembly Bill 2514 Energy Storage System Procurement Targets from Publicly Owned Utilities (2010); and Assembly Bill (AB) 802 Building Energy Benchmarking Program (2015). As a result of some of these adopted state laws, some of these policies inform and/or create the framework for local plans, programs, and regulations including, but not limited

²² California Energy Commission, https://www.energy.ca.gov/, accessed April 18, 2019.

to: the City of Los Angeles' Green New Deal Plan²³; the Los Angeles Green Building Code; and implementation of AB 802, the City's Existing Buildings Energy and Water Efficiency (EBEWE) Program. As the proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the Former CRA/LA in the LAMC; the proposed Project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore no impacts would occur, no further analysis is required.

²³ Green New Deal PlanSustainable Plan 2019, http://plan.lamayor.org/, accessed April 18, 2019.

VII. GEOLOGY AND SOILS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
	ii. Strong seismic ground shaking?				\boxtimes
	iii. Seismic-related ground failure, including liquefaction?				\boxtimes
	iv. Landslides?				\boxtimes
b.	Result in substantial soil erosion or the loss of topsoil?				\boxtimes
C.	Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				\boxtimes
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				\boxtimes
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				\boxtimes

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

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

i) No Impact. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults. These zones identify areas where potential surface ruptures along active faults could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. Some portions of the Project Area (i.e., Hollywood) is located within the Alquist-Priolo Earthquake Fault Zone²⁴. The Project by itself does not propose or authorize any development and is not expected to induce development or otherwise alter existing development or development patterns so no ground rupture is expected to occur from the proposed Resolution and Ordinance. The Project itself would not change the existing built environment or the natural environment, or increase the risk of exposing people or structures to potential risk of loss, injury, or death, therefore, no impacts related to ground rupture would occur.

ii) Strong seismic ground shaking?

ii) No Impact. The Project Area is located within seismically active Southern California and therefore, could be subject to moderate and possibly strong ground motion due to earthquakes on the faults shown in Figure 2. The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC; and is not expected to induce development or otherwise alter existing development or development patterns. The Project itself does not propose or authorize development and all development in the Project Area would continue to be required to comply with all relevant California Building Code (CBC)²⁵ and the City of Los Angeles Uniform Building Code (UBC) seismic standards. As necessary, development projects may be required to also prepare a site-specific geotechnical investigation that would evaluate the potential for seismic risk and identify appropriate mitigation measures. Compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would reduce potential impacts. The proposed Project, by itself, does not trigger development, construction, or ground disturbing activity and is not expected to induce development or otherwise alter existing development or development patterns, therefore, no impacts would occur directly or indirectly as a result of the Project, no further analysis is required.

²⁴ City of Los Angeles General Plan, Safety Element, Exhibit A Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed April 4, 2019.

²⁵ California Building Standards Code, https://www.dgs.ca.gov/BSC/Codes, accessed April 18, 2019.

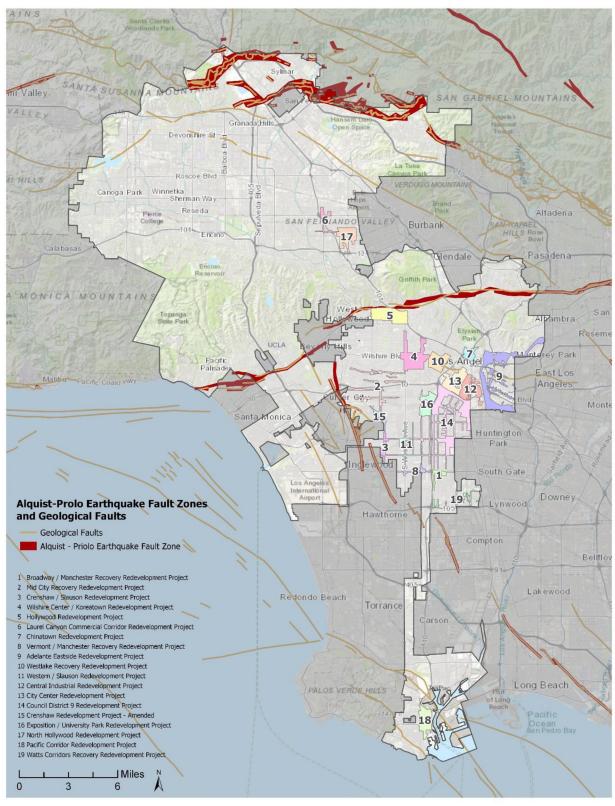


Figure 2: Alquist-Priolo Earthquake Fault Zones and Geological Faults

iii) Seismic-related ground failure, including liquefaction?

iii) No Impact. Soil liquefaction occurs when loosely packed, water-logged sediments at or near the ground surface lose their strength in response to strong ground shaking²⁶. Portions of the Project Area are susceptible to liquefaction as shown in **Figure 3** and thus may be susceptible to seismic-related ground failure such as lateral spreading, subsidence, or settlement. Current and future construction activities would continue to be required to comply with current seismic design provision of the California Building Code and City's Building Code, which incorporates relevant provisions related to protection against liquefaction. Compliance with regulatory measures would reduce potential impacts. Implementation of the proposed Project by itself does not trigger new development or construction and is not expected to induce development or otherwise alter existing development or development patterns, thus, no impacts would occur and so no further analysis is required.

iv) Landslides?

iv) No Impact. Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. Portions of the Project Area is located in sections of the City with hills and slopes, and is susceptible to landslides.

Portions of the Project Area (i.e., Adelante Eastside, Chinatown, and Pacific Corridor) are susceptible to landslides and a cluster of small shallow surface landslides as shown in **Figure 3**²⁷. Development in the Project Area is required to comply with all applicable regulations and design standards of the LAMC and the City's "Hillside" Development regulations, which generally sets specific building requirements beyond the CBC that relate directly to development of lots in designated "Hillside Areas." In addition, if deemed necessary by Department of Building and Safety, project applicants would be required to prepare a site-specific geotechnical investigation that would evaluate the potential for landslide risk and identify appropriate mitigation measures. Compliance with these regulatory measures would ensure that the any development project would not create substantial geologic risk due to landslides. Additionally, the implementation of the proposed Project by itself does not propose new development or construction by itself and is not expected to induce development or otherwise alter existing development or development patterns, thus, no impacts would occur and no further analysis is required.

²⁶ USGS, https://www.usgs.gov/faqs/what-liquefaction?qt-news_science_products=0#qt-news_science_products, accessed April 9, 2019.

²⁷ City of Los Angeles General Plan, Safety Element, Exhibit C Landslide Inventory & Hillside Areas in the City of Los Angeles, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed April 9, 2019.

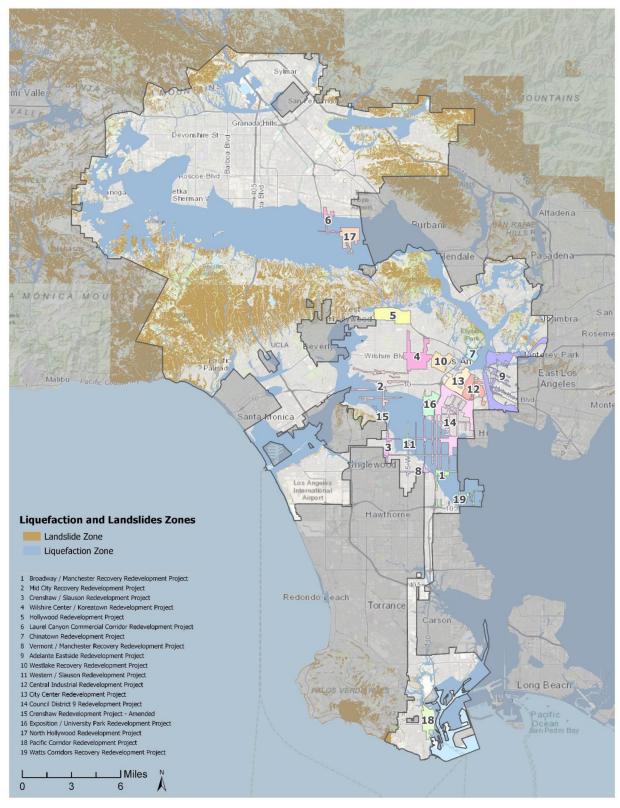


Figure 3: Liquefaction and Landslides Zones

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

No Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the Project Area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used. Portions of the Project Area is located in sections of the City with hills. Construction activities in designated "Hillside Areas" are subject to all applicable Best Management Practices (BMPs) relating to erosion and stormwater runoff and included in the City's Low Impact Development (LID) Ordinance (Ordinance No. 181899). LID is a stormwater management strategy that seeks to mitigate the impacts of runoff and stormwater pollution as close to its source as possible. LID comprises a set of site design approaches and BMPs that are designed to address runoff and pollution at the source. The proposed Project by itself does not propose or authorize development and is not expected to induce development or otherwise alter existing development or development patterns, thus, adoption and implementation of the Project would not result in substantial erosion or loss of topsoil, no impacts would occur and no further analysis is required.

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

No Impact. As previously discussed in **Section VII a(iii)** and **a(iv)**, portions of the Project Area is susceptible to surface landslides and liquefaction. However, the Project does not propose or authorize development and would not authorize or expand any allowable land uses.

Future development that occurs would be designed and constructed in conformance with the Redevelopment Regulations, CBC, as well as the City's UBC requirements and other laws designed to protect site occupants from risks related to unstable soil. Compliance with existing laws regarding the risk of loss, injury, or death, from lateral spreading, subsidence, liquefaction or collapse would reduce potential impacts to less than significant levels, however, since no development project is proposed and is not expected to induce development or otherwise alter existing development or development patterns, no impacts would occur by adoption of the proposed Resolution transferring the land use authority of the CRA/LA-DLA to the City and implementation of the Redevelopment Regulations by the proposed Ordinance. No further analysis is required.

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

No Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content and poor drainage. Compliance with existing laws, as required by the Los Angeles Department of Building and Safety (LADBS) would reduce potential impacts from expansive soils to less than significant levels, however, the proposed Project does not propose or authorize development and would not authorize or expand any new or allowable land uses and is therefore, not expected to induce development or otherwise alter existing development or development patterns, so no impacts would occur by adoption of the proposed Project. No further analysis is required.

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

No Impact. The proposed Project does not propose or authorize any new development, and would not authorize or expand any allowable land uses. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. Additionally, the Project Area is also located within the urban environment and a majority of the lots within the Project Area are developed with residential, commercial, industrial or open spaces used for recreation, that are generally connected or required to connect to the City's existing sewer infrastructure. As the Project is not proposing or authorizing development, no impact would occur and no further analysis is required.

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

No Impact. Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations.

The Project itself, does not propose or authorize development and is not expected to induce development or otherwise alter existing development or development patterns. In general, most sites that would be developed subsequent to the adoption of the proposed Project would have been previously disturbed as the Project Area is in an urban environment. Therefore, no impact would occur directly or indirectly as a result of the implementation of the proposed Resolution and Ordinance and no further analysis is required.

VIII. GREENHOUSE GAS EMISSIONS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would	the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				\boxtimes
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				\boxtimes

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

No Impact. Greenhouse gases (GHG) have been recognized to contribute to global climate change. Predicted effects of global climate change include sea level rise, water supply changes; changes to ecosystems and habitat; and human health effects. Until the passage of Assembly Bill (AB) 32, CEQA documents generally did not evaluate GHG emissions or impacts on global climate change. With the passage of AB 32, California is required to reduce its GHG emissions. Under AB 32 GHGs include:

- Carbon dioxide (CO2);
- Methane (CH4);
- Nitrous oxide (N2O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs);
- Sulfur hexafluoride (SF6); and
- Nitrogen trifluoride (NF₃)²⁸

The transportation sector remains the substantial source of GHG emissions in California, with emission coming from the tailpipe of cars, trucks, off-road transportation sources, intrastate aviation, etc. The residential and commercial sectors contribute a much smaller percentage of GHG emission in California compared to the transportation, industrial, electricity, and agriculture sectors. Greenhouse gas emissions from the commercial and residential sectors are dominated by the combustion of natural gas and other fuels for household use and for commercial businesses, such as space heating, cooking, and hot water or steam generation. Emissions from the electricity used for cooling (air-conditioning) and appliance operation are already accounted for in the electricity sector²⁹.

²⁸ Nitrogen trifluoride was not listed initially in AB 32 but was subsequently added to the list via legislation.

²⁰¹⁸ Edition, California Greenhouse Gas Emission Inventory: 2000 – 2016, https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2016/ghg_inventory_trends_00-16.pdf, accessed April 9, 2019

The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC; it does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. Therefore, it is not reasonably foreseeable that the proposed Project by itself, or subsequent implementation of the proposed Project would generate greenhouse gas emissions that may have a significant impact on the environment either directly or indirectly, no impact would occur, no further analysis is needed.

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

No Impact. As mentioned in **Section VIII (a)** above, the transportation sector remains the substantial source of GHG emissions in California, with emission coming from the tailpipe of cars, trucks, off-road transportation sources, intrastate aviation, etc. The California legislature passed Senate Bill (SB) 375 (2008) to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the SCS is contained in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2012-2035 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and commercial corridors, resulting in more opportunity for transit-oriented development. Additionally, SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions that reduce vehicle miles traveled (which contribute to GHG emissions), as required by AB 32.

As previously discussed, the proposed Project does not consist of a development project and does not propose or authorize development or construction activity. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC it does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. Based on the above, no impacts would occur.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?
- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
- f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
			\boxtimes
			\boxtimes
			\boxtimes
		\boxtimes	
			\boxtimes

Less Than

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

No Impact. A significant impact would occur if the proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Project would not specifically result in the transport, use, and disposal of construction-related hazardous materials, as no specific development is proposed. Any

development under the proposed Project would occur in conformance with all applicable local, state, and federal regulations governing such activities.

Operation of future residential and mixed-use development would foreseeably use common hazardous materials for cleaning purposes, landscaping, and routine maintenance. Examples of such materials could include cleaning solvents, fertilizers, pesticides, and herbicides for landscaping, and painting supplies. Such products would only be considered hazardous if used inappropriately or if exposed to unfavorable conditions. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and disposal of these materials would not pose a significant hazard to the public or the environment. As the proposed Project does not authorize development and would not authorize or expand any new or allowable land uses and is not expected to induce development or otherwise alter existing development or development patterns, no impacts related to the use of hazardous materials would occur. No further analysis is required.

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

No Impact. Refer to **Section IX (a)** above. Some existing structures within the Project Area that are demolished or renovated may contain lead-based paint (LBP) and/or asbestos containing materials (ACMs). If not properly abated, the demolition of these structures could accidently release hazardous materials, and the transport of these materials could create a public health risk. Construction activities would be required to comply with the SCAQMD Rule 1403 which regulates the removal of ACMs to ensure that asbestos fibers are not released into the air during demolition and renovation activities. California Code of Regulations (CCR) Title 8, Section 1532.1 et seq. requires that all LBPs be abated and removed by a licensed lead contractor. The Project does not authorize or propose any new development and is not expected to induce development or otherwise alter existing development or development patterns. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No impacts would occur as the result of the Project. No further analysis is required.

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

No Impact. There are several schools located within the Project Area. The Project does not authorize or propose any new development. As discussed in **Section IX (a)** above, any future development would generally include the use of those hazardous materials that are typically necessary for construction of building structures (e.g., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction activities would involve routine transport, use, and disposal of these types of hazardous materials. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities.

All potentially hazardous materials transported, stored, or used on individual project sites for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and

handled in compliance with applicable standards and regulations. Future development would be required to comply with all federal, state and local standards and regulations. Therefore, the Project is not expected to adversely affect the existing schools in and around the Project Area. No impact would occur. No further analysis is required.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the California Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on an annual basis.

As listed in **Table 4, Cortese List**, there are several DTSC Cleanup Sites and Leaking Underground Storage Tank (LUST) Cleanup Sites^{30,31}located within the Project Area.

It is considered unlikely that the Project would cause any impact causing a significant risk to the public. The Project does not propose or authorize any specific development projects, and only relates to the transfer of land use authority of the CRA/LA-DLA to the City and the implementation of Redevelopment Regulations by establishment of procedures in the LAMC and clarification of references to the Former CRA/LA. The proposed Project is not expected to induce development or otherwise alter existing development or development patterns. Thus, any future development that occurs in the Project Area would be required to comply with existing regulations related to hazardous materials. Accordingly, compliance with state and local laws and regulations would ensure impacts would be less than significant. No further analysis is required.

Table 4: Cortese List ³²					
Redevelopment Project	Facility Name	Address	Туре		
Council District 9	Standard Nickel Chromium Plating Co.	811,817/819, 825 & 826 E. 62nd Street	DTSC Site Cleanup Program		
Council District 9	Palace Plating	710 East 29th Street	DTSC Site Cleanup Program		
Adelante Eastside	Arco - Serrato, Rudy C.	5555 E Alhambra Ave	Lust Cleanup Site		
Adelante Eastside	Manual Gallegos	4635 Valley Blvd. E.	Lust Cleanup Site		
Adelante Eastside	Lac/Usc Medical Center	1200 State St N	Lust Cleanup Site		
Adelante Eastside	Shell	1203 Soto St.	Lust Cleanup Site		
Adelante Eastside	Moza Automotive Repair	1201 Mission Rd N.	Lust Cleanup Site		
Adelante Eastside	Winall #1	401 Soto St. S.	Lust Cleanup Site		
Adelante Eastside	Former Service Station	110-114 Boyle Ave S	Lust Cleanup Site		
Broadway / Manchester					
Recovery	Buy Rite Gasoline	251 Manchester Ave	Lust Cleanup Site		
Broadway / Manchester					
Recovery	Shell Station	9915 Broadway S	Lust Cleanup Site		
Chinatown	Jimmie Joe's Texaco	900 Hill St N	Lust Cleanup Site		

³⁰ GeoTracker Site/Facility Type Definitions, https://geotracker.waterboards.ca.gov/site_type_definitions, accessed April 10, 2019.

³¹ This lists include, but are not limited to, the 'EnviroStor' (http://www.envirostor.dtsc.ca.gov/public/) and 'GeoTracker' (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and the SWRCB, respectively, accessed April 10, 2019.

 ³² California Environmental Protection Agency, Cortese List Data Resources, https://calepa.ca.gov/SiteCleanup/CorteseList/, accessed April 11, 2019

Table 4: Cortese List (Continued)					
Redevelopment Project	Facility Name	Address	Туре		
	Jackson, Demarco &				
Council District 9	Peckenpaugh	5843-51 Wall St	Lust Cleanup Site		
	Golden Gate Knitting Mill (Designs				
Council District 9	In Pipe)	6930 Avalon Blvd	Lust Cleanup Site		
Council District 9	Fomer Gasoline Station	7402 S Avalon Blvd	Lust Cleanup Site		
Council District 9	Former Target Service Station	6121 Vermont Avenue	Lust Cleanup Site		
Council District 9	Winall Oil #2	615 Florence Ave	Lust Cleanup Site		
		3950 Martin Luther King			
Crenshaw	James Lee Service Center	Jr. Bl.	Lust Cleanup Site		
Exposition / University Park	Chevron Station #207669	4000 Figueroa St	Lust Cleanup Site		
Hollywood	Gas To Go (Former)	1353 Western Ave. N.	Lust Cleanup Site		
*	Mobil #18-Hyo/Circle K Store		·		
Hollywood	#2211262	5857 Sunset Blvd W	Lust Cleanup Site		
		1260 Saint Andrews			
Hollywood	Caltrans Pumping Station	Place N.	Lust Cleanup Site		
Mid City Recovery	Ken's Automotive	5787 Adams Blvd W	Lust Cleanup Site		
Mid City Recovery	Mobil 17314 (Former)	5501 Adams Blvd.	Lust Cleanup Site		
Mid City Recovery	World Oil #27	5234 Adams Blvd W	Lust Cleanup Site		
Mid City Recovery	Magic Auto Body	5217 W Pico Blvd	Lust Cleanup Site		
,	Great American Gas Co. (Former		•		
Mid City Recovery	Texaco)	5801 Pico Blvd W	Lust Cleanup Site		
Mid City Recovery	Dong Á Auto Service	1510 La Brea Ave, S.	Lust Cleanup Site		
Vermont / Manchester					
Recovery	Chung's Auto Repair	8620 Normandie Ave. S.	Lust Cleanup Site		
Vermont / Manchester		1247 Manchester			
Recovery	Former Service Station	Avenue, West	Lust Cleanup Site		
Vermont / Manchester		,			
Recovery	Manchester St Andrews Carwash	1923 Manchester Ave W	Lust Cleanup Site		
Vermont / Manchester					
Recovery	Mobil #18-Kwl (Former #11-Kwl)	1803 Manchester Ave W	Lust Cleanup Site		
Vermont / Manchester	, , , , , , , , , , , , , , , , , , , ,				
Recoverv	Mobil 18-K1r	1406 Manchester Ave W	Lust Cleanup Site		
Vermont / Manchester			•		
Recovery	Shell #204-4539-0600	1553 Manchester Ave W	Lust Cleanup Site		
Watts Corridors Recovery	United Oil #38	11320 Main St S	Lust Cleanup Site		
Western / Slauson	Pizza Hut Site #11-7488	1851 Slauson Ave. W.	Lust Cleanup Site		
Western / Slauson	Western Gage Property	6300 Western Ave	Lust Cleanup Site		
Western / Slauson	Smith Auto Repair (Former)	6610 Normandie Ave S	Lust Cleanup Site		
Western / Slauson	Southwest Street Maint Yard	5860 Wilton PI S	Lust Cleanup Site		
Westlake Recovery	Former International Tire Facility	800 Hoover, South	Lust Cleanup Site		
Westlake Recovery	Mobil #18-Hyq	958 Alvarado St S	Lust Cleanup Site		
	Former Chevron #306417 (Former				
Westlake Recovery	Unocal #0219)	2101 8th St W	Lust Cleanup Site		
Wilshire Center / Koreatown	HK Market	124 Western Ave. N.	Lust Cleanup Site		
Wilshire Center / Koreatown	Circle K #2211315/Mobil #18-Lgg	4605 Beverly Blvd	Lust Cleanup Site		
Wilshire Center / Koreatown	Paks Western Plaza Llc	833 Western Ave S	Lust Cleanup Site		
Wilshire Center / Koreatown	Fisher Property	3800-3832 6th Street	Lust Cleanup Site		
Wilshire Center / Koreatown	Mobil #18-LIr	989 Western Ave W	Lust Cleanup Site		
Wilshire Center / Koreatown Wilshire Center / Koreatown	Car Wash	401 South Western Ave	Lust Cleanup Site		
VVIISNIFE Center / Koreatown Source: California Environmental Protection Age		401 South Western AVe	Lust Cleanup Site		

Source: California Environmental Protection Agency

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Area is not located within an airport land use plan or generally within the vicinity of a public airport or private airstrip, except that the North Hollywood Redevelopment Project Area is 1.48 miles from the Bob Hope Airport (See Table 4: Airports Serving the Project Area). As the Project does not propose or authorize development and is not expected to induce or disincentivize development or otherwise change development patterns, there will be no safety hazard or excessive noise for the people residing or working within the Project Area, therefore, no impact would occur. No further analysis is required.

	Table 5: Airports Serving the Project Area				
Redevelopment Project Area	Airport Name	Distance (in miles)			
Adelante Eastside	San Gabriel Valley Airport	7.25			
Broadway / Manchester Recovery	Hawthorne Municipal Airport	3.18			
Central Industrial	Hawthorne Municipal Airport	8.43			
Chinatown	Hawthorne Municipal Airport	10.62			
City Center	Hawthorne Municipal Airport	8.43			
Council District 9	Hawthorne Municipal Airport	3.70			
Crenshaw / Slauson	Hawthorne Municipal Airport	3.07			
Crenshaw (Amended)	Hawthorne Municipal Airport	4.98			
Exposition / University Park	Hawthorne Municipal Airport	6.33			
Hollywood	Bob Hope Airport	6.29			
Laurel Canyon Commercial Corridor	Bob Hope Airport	2.01			
Mid City Recovery	Santa Monica Municipal Airport	4.74			
North Hollywood	Bob Hope Airport	1.48			
Pacific Corridor	Zamperini Field (Torrance Airport)	4.08			
Vermont / Manchester Recovery	Hawthorne Municipal Airport	2.54			
Watts Corridors Recovery	Compton / Woodley Airport	2.68			
Western / Slauson	Hawthorne Municipal Airport	3.19			
Westlake Recovery	Hawthorne Municipal Airport	9.24			
Wilshire Center / Koreatown	Bob Hope Airport	8.08			

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

No Impact. Emergency services in the City are provided by the City of Los Angeles Fire Department (LAFD) and the City of Los Angeles Police Department (LAPD). Emergency incidents of a larger natural or manmade disaster require coordinated efforts between the LAFD, LAPD and the City's Emergency Operation Center (EOC). The EOC is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the National All-Hazards approach to major disasters such as fires, floods, earthquakes, acts of terrorism and large-scale events in the City that require involvement by multiple City departments³³.

The Project Area is largely along major transit corridors, therefore, along City designated disaster routes³⁴. Disaster Routes are freeway, highway or arterial routes pre-identified for use during times of crisis³⁵. Implementation of the Project would not require or result in modifications to any of the roadways that would impact emergency traffic. The Project does not propose or authorize development and is not expected to induce development or change development patterns and would not make changes to existing policies, programs, or regulations that address emergency response. Therefore, the Project would not physically interfere with any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan. No impacts would occur. No further analysis is required.

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

No Impact. The Project Area is located within a highly urbanized area. The Very High Fire Hazard Severity Zone comprises most of the hilly and mountainous regions of the City, and does not include a majority of the Project Area as shown in Figure 4: Very High Fire Hazard Severity Zones.

³³ Emergency Management Department, Emergency Operations Center, http://emergency.lacity.org/eoc, accessed April 10, 2019.

³⁴ City of Los Angeles, Safety Element, Exhibit D, November 1996, pg. 53

³⁵ Los Angeles County, Public Works, https://dpw.lacounty.gov/dsg/DisasterRoutes/, accessed April 19, 2019.

Adelante Eastside, Chinatown, Crenshaw, and Hollywood redevelopment project areas have only a small portion located within High Fire Hazard Severity Zone.

Additionally, Red Flag Restricted Areas are areas where illegally parked vehicles may be removed because they create hazardous conditions on Red Flag Days. These areas are identified to be very narrow roads, have hairpin turns, tight curves, and key intersections that, if not cleared of vehicles would create a choke point thereby delaying the ability for citizens to evacuate and limiting access by fire companies. The Project Area does not contain any Red Flag Restricted Areas³⁶. The Project, by itself, does not propose or authorize any development or authorize or expand any allowable land uses, therefore, the Project would not expose people or structures to a significant risk of loss, injury of death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

³⁶ NavigateLA, http://navigatela.lacity.org/navigatela/, accessed April 10, 2019.

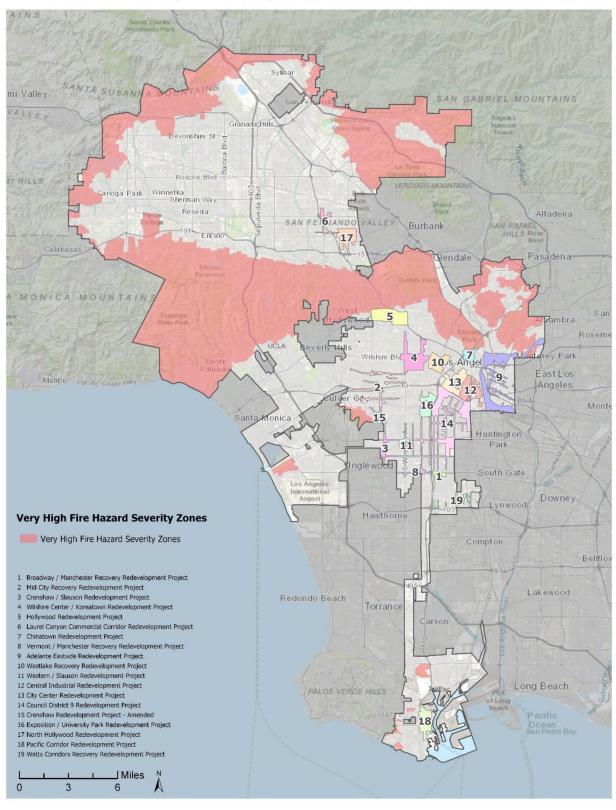


Figure 4: Very High Fire Hazard Severity Zones

X. HYDROLOGY AND WATER QUALITY

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	
		Impact	Incorporated	Impact	No Impact
Would th	he project:				
c	/iolate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				\boxtimes
ii s	Substantially decrease groundwater supplies or nterfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
t t a	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	 Result in substantial erosion or siltation on- or off-site; 				
	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
	iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
	iv. Impede or redirect flood flows?				
	n flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				\boxtimes
c	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				\boxtimes

Loce Then

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

No Impact. A significant impact may occur if a development project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a development project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). The Project by itself, does not authorize or expand any land uses so the Project does not include any point-source discharge (discharge of polluted water from a single point such as sewageoutflow pipe). Additionally, future development projects, when applicable, are required to comply with the City of Los Angeles Low Impact Development (LID) Ordinance No. 181,899³⁷ which is a stormwater management strategy and requirements of the City's Standard Urban Stormwater Mitigation Plan (SUSMP) to address stormwater pollution from new developments and redevelopment projects. Therefore, the Project would not result in an impact to water quality and waste discharge. No further analysis is required.

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

No Impact. A significant impact would occur if the Project substantially depleted groundwater or interfered with groundwater recharge. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from four primary sources according to the Five-Year Average, Fiscal Year 2012-2016, water was supplied by the Metropolitan Water District (MWD) at 64 percent (broken down by Bay Delta at 54 percent and Colorado River at 10 percent); the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (20 percent), local groundwater (14 percent), and recycled water (2 percent)³⁸. Based on the City's most current Urban Water Management Plan (UWMP)³⁹ in 2011-2014 the LADWP had a total water demand of 566,990 acre-feet per year with approximately 209,651 acre-feet or 37% of the demand from single-family; 165,364 acre-feet⁴⁰ or 29% of the demand from multifamily: 98,994 acre-feet or 17% from commercial: 17,663 acre-feet or 3% from industrial: 42,453 acre-feet or 8 % from government; and 32,774 acre-feet from non-revenue sources. The lots located within the Project Area are developed with a range of single-family, multi-family, manufacturing, commercial, and government uses and would not be expected to substantially change surface area on the lots as the Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC; it does not propose or authorize development and will not incentivize or disincentive development or change development patterns. Therefore, there would be no impacts related to groundwater supplies. No further analysis is required.

³⁷ Ordinance No. 181,899, http://clkrep.lacity.org/onlinedocs/2009/09-1554_ord_181899.pdf, accessed April 10, 2019.

³⁸ Los Angeles Department of Water and Power - Water: Facts and Figures, Briefing Book 2017-2018, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrlstate= 18i8d8hpzl_21&_afrLoop=430938015435485, accessed April 10, 2019.

³⁹ Los Angeles Department of Water and Power – 2015 Urban Water Management Plan, website: https://www.ladwp.com/ladwp/faces/wcnav_externalld/a-w-sosuwmp;jsessionid=xfbvbyzXCCdnN6nmkbznXJSp86hLJgvnrFB12bQLsdSrFSvSfyKT!-1896400610?_afrLoop=353937528751225&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D3539375 28751225%26_afrWindowMode%3D0%26_adf.ctrl-state%3D9enb0ard3_4, accessed April 10, 2019.

⁴⁰ One acre foot equals 325,851 gallons of water.

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

- i. Result in substantial erosion or siltation on- or off-site;
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- iv. Impede or redirect flood flows?

Less Than Significant Impact. Significant impact would occur if the Project substantially altered the drainage pattern of the Project Area or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. In general, the Project Area is developed and built-out with a range of single-family residential, multi-family residential, manufacturing, government, and commercial uses. There are no natural watercourses within the Project Area⁴¹.

As discussed in **Section X (a)** above, development that occurs in the Project Area would be required to comply with all federal, state and local regulations regarding stormwater runoff, including the City's LID Ordinance and the City's UWMP Best Management Practices (BMPs). Compliance with these regulatory measures would reduce the amount of surface water runoff leaving the Project Area after a storm event. Any development that occurs in the project area would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site. The Project does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. No further analysis is needed.

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

No Impact. A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

No parts of the Project Area are located within a potential inundation area⁴². Seiches can occur in areas adjacent to water storage facilities. Inundation from a seiche can occur if a wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. LADWP regulates the level of water in its storage facilities and provides

⁴¹ NavigateLA, http://navigatela.lacity.org/navigatela/, accessed April 10, 2019

⁴² City of Los Angeles Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf., access April 10, 2019.

walls of extra height to contain seiches and prevent overflow. In addition, the LADWP monitors dams and reservoirs during storm events and implements mitigation measures to prevent potential overflow. No portion of the Project Area is subject to flooding as a result of inundation from water storage facilities. The Project does not include any development and only relates to the transfer of land use authority from the CRA/LA-DLA to the City within the Project Area. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. Therefore, the Project would not expose people or structures to significant risk of injury. No impact would occur and no further analysis is necessary.

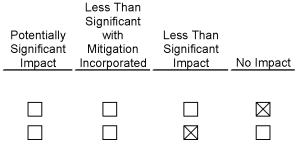
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The Project, by itself, does not propose or authorize any development. The Project is not intensifying any of the existing allowable land uses, thus, existing conditions are not expected to significantly change or cause a conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Any future development would be restricted to the existing allowable land uses and would continue to be subject to all applicable state or local water quality control plan or sustainable groundwater management plan. Therefore, no impacts related to implementation of a water quality control plan or sustainable groundwater management plan would occur, no further analysis is needed.

XI. LAND USE AND PLANNING

Would the project:

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



a) Physically divide an established community?

No Impact. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The proposed Project would not involve any street vacation or closure or result in development of new thoroughfares or highways which would divide established communities.

The proposed Project, consisting of a Resolution and Ordinance, is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishing procedures in the LAMC to implement the 19 unexpired Redevelopment Plans; and clarifying references to the former CRA/LA in the LAMC to facilitate the implementation of the 19 unexpired Redevelopment Plans. No impacts that would physically divide an established community would occur, therefore, no further analysis is needed.

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

Less Than Significant Impact. The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC; and is not expected to induce development or otherwise alter existing development or development patterns.

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

Redevelopment Project Area	Redevelopment Project Area in Square Miles	Community Plan Area(s)
		Boyle Heights
Adelante Eastside	3.38	 Northeast Los Angeles
		South Los Angeles
Broadway / Manchester Recovery	0.29	 Southeast Los Angeles
		Central City
Central Industrial	1.16	Central City North
		Central City
Chinatown	0.47	Central City North
City Center	1.37	Central City
		South Los Angeles
Council District 9 Corridors Recovery	4.40	 Southeast Los Angeles
Crenshaw / Slauson Recovery	0.41	West Adams - Baldwin Hills - Leimert
Crenshaw	0.32	West Adams - Baldwin Hills - Leimert
		South Los Angeles
Exposition / University Park	0.90	 Southeast Los Angeles
Hollywood	1.77	Hollywood
Laurel Canyon Commercial Corridor	0.43	North Hollywood - Valley Village
		 West Adams - Baldwin Hills – Leimert
Mid-City Recovery	1.10	Wilshire
North Hollywood	1.16	North Hollywood - Valley Village
Pacific Corridor	1.07	San Pedro
Vermont / Manchester Recovery	0.25	South Los Angeles
Watts Corridors Recovery	0.38	Southeast Los Angeles
Western / Slauson Recovery	0.59	South Los Angeles
Westlake Recovery	1.00	Westlake
Wilshire Center/ Koreatown	1.88	Westlake Wilshire

Table 1: Unexpired Redevelopment Project Areas

Community Plans share many of the same goals and objectives as the Redevelopment Plans because they must be consistent with the General Plan as required by Redevelopment Law. Pursuant to Redevelopment Law, Health and Safety Code (HSC) Sec. 33331, every redevelopment plan shall be consistent with the community's general plan.

Prior to the dissolution of redevelopment agencies, the former CRA/LA would update the Redevelopment Plans whenever there were Community Plan updates or changes to legislation in order to remain consistent with the General Plan in accordance with HSC Sec. 33331. Since dissolution in 2012, the City has updated General Plan Elements including the Housing Element, the Mobility Element, and numerous Community Plans that overlap with unexpired Redevelopment Plans including the San Pedro Community Plan, the South Los Angeles Community Plan, the Southeast LA Community Plan, and the West Adams Community Plan. Additionally, new State and local laws have also been enacted since dissolution with policies related to land use and affordable housing that have evolved since 2012 such as Senate Bill (SB) 35 Streamlined Infill Projects for certain affordable housing developments and Assembly Bill (AB) 3194 the Housing Accountability Act which limits local agencies' ability to disapprove, or unfairly condition approval of, housing development projects for lower and moderate income housing. In addition, the City's recently adopted TOC program as previously discussed was adopted by referendum pursuant to Measure JJJ to increase the City's supply of affordable housing. The City's local plans, policies and some of the recent state legislation addressing the California housing crisis may conflict with the CRA/LA-DLA's unexpired Redevelopment Plans particularly plans with density limitations in certain Redevelopment Project Areas. While the proposed Project does not do anything to modify the Redevelopment Plan density limitations either through direct intervention, or interpretations of the Redevelopment Regulations, the proposed Project will

provide the City the ability to further review and determine the steps necessary to create consistency between the Redevelopment Plans and City and State legislation.

Furthermore, when the CRA/LA operated at full capacity, it performed and prioritized economic development activities. Many of the goals, objectives and regulations of the Redevelopment Plans aimed to revitalize neighborhoods by directing tax increment funds into these communities and negotiating certain community benefits in conjunction with the approval of development projects such as requiring affordable housing. The former CRA/LA provided significant financial assistance or development incentives to these development projects while requiring projects to provide community benefits. As a result, many of the Redevelopment Plan Regulations require additional levels of review and sign-off from CRA/LA staff and/or discretionary approvals from the CRA/LA's Board than would otherwise be required under City regulations. Post dissolution, CRA/LA-DLA's primary objective is to wind-down the operations of the former CRA/LA and no longer pursue redevelopment activities. The CRA/LA-DLA only has limited staff dedicated to implementing the Redevelopment Regulations.

Due to the diminished staffing levels and the CRA/LA-DLA's current goal to wind down operations, Redevelopment Plans have not remained consistent with recent updates to the City's adopted plans or changing policies at the state and local level. CRA-LA/DLA no longer has the capacity to support regular updates to the Redevelopment Plans to ensure consistency with evolving local and state policy goals. Subsequently, there is more likely to be a conflict between the Redevelopment Plans and City and State land use plans, policies or regulations. Approving the proposed Project would allow the City the ability to address and minimize any conflicts.

The proposed Project consolidates the land use authority with a single entity within the City, the proposed Project does not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, but rather aims to reduce any conflict. As mentioned, no changes to the Redevelopment Regulations or interpretations of the Redevelopment Regulations are proposed with the Project, nor have any changes been initiated or are planned. Any future policy development in response to any existing land use conflict between the existing Redevelopment Plans and City or State policies would be addressed in a separate legislative action in accordance with the applicable State Redevelopment Plans, policies and interpretations, less than significant impacts would occur, no further analysis is needed.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				\boxtimes
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?				

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

No Impact. According to the City of Los Angeles General Plan, primary mineral resources within the City are rock, gravel and sand deposits⁴³. Under the California Surface Mining and Reclamation Act of 1975 (SMARA), the state geologist (Division of State Mining and Geology Board) identifies and classifies all the mineral deposits in the state. The state geologist classified Mineral Resources Zone-2 (MRZ-2 sites) within the City. MRZ-2 sites contain potentially significant sand and gravel deposits to be conserved. The Project Area does not contain any MRZ-2 sites as they are located outside of the Project Area's boundaries in the Sun Valley-LA Tuna Canyon and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan Areas. No impacts would occur, no further analysis is required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. See response to **Section XII (a)** above. As discussed, there are no portions of the Project Area that are designated as a mineral resource. The proposed Project itself does not propose or authorize development or expand any land uses, therefore, implementation of the Project would not result in the loss of availability of a mineral resource. No impact associated with mineral resources would occur. No further analysis is required.

⁴³ City of Los Angeles General Plan, Conservation Element, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed April 4, 2019.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
 b. Generation of excessive groundborne vibration or groundborne noise levels? 				\boxtimes
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				

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

No Impact. The Citywide noise regulations are included in the Chapter XI, of the LAMC. Chapter XI, Section 111.03 sets forth presumed day/night ambient noise levels based on zones. Presumed ambient noise levels for the Project Area are described in the table below.

	Presumed Ambient Noise Level (dB(A)) ⁴⁴	
Zone	Day	Night
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50	40
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60	55
M1, MR1, and MR2	60	55
M2 and M3	65	65

Note: In this chart, daytime levels are to be used from 7:00 a.m. to 10:00 p.m. and nighttime levels from 10:00 p.m. to 7:00 a.m.; At the boundary line between two zones, the presumed ambient noise level of the quieter zone shall be used.

Section 112.05 of the LAMC establishes that between the hours of 7 a.m. and 10 p.m. a maximum noise level for construction equipment is 75 dB(A) at a distance of 50 feet when operated within 500 feet of a residential zone. Construction noise from future development would be temporary and exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies would be less

project expose people residing or working in the

project area to excessive noise levels?

⁴⁴ Source: LAMC Section 111.02 Table II: Sound Level "A" Decibels

than significant. The proposed Project is not a development project and future development would need to comply with the Citywide noise regulations. Additionally, the proposed Project does not change or expand any allowable land uses, so no additional ambient noise levels would be expected to occur. Therefore, impacts related to noise would be no impact. No further analysis is needed.

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

No Impact. Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on structures located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels.

The Federal Transit Administration (FTA) and Caltrans have published standard vibration velocities for construction equipment operations. The reference vibration levels (peak particle velocities, PPV) for typical construction equipment is 0.0076 PPV at 25 ft. (in/sec) for a loaded truck and 0.089 PPV at 25 ft. (in/sec) for a large bulldozer⁴⁵. These types of equipment can create intense noise that can result in ground vibrations. As described, loaded trucks and large bulldozers are capable of producing vibration levels of approximately 0.076 and 0.089 PPV, respectively, at 25 feet from the source, which is below the FTA threshold of 0.2 PPV for non-engineered masonry and other structures; therefore, these activities would not result in significant vibration impacts.

The Project itself, does not propose or authorize development, nor does it expand allowable land uses. Adoption of the proposed Project to transfer the land use authority of the CRA/LA-DLA to the City; establish procedures to implement the Redevelopment Regulations; and clarify references to the former CRA/LA would not directly result in construction activities and is not expected to induce development or otherwise alter existing development or development patterns. Thus, the proposed Project would not create excessive groundborne vibration or groundborne noise levels. No impact would occur.

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

No Impact. As discussed in **Section IX (e)**, Hazards and Hazardous Materials, the Project Area is generally not located within an airport land use plan, or the vicinity of a public airport or private airstrip. The majority of the Project Area is generally located outside of any Airport Influence Areas defined as an area which current or future airport-related noise, over flight, safety, and/or airspace

⁴⁵ The Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf, accessed April 19, 2019.

protection factors may significantly affect land uses or necessitate restrictions on those areas. Airport Influence Areas includes airport owned property, Runway Protections Zones, inner and outer safety zones, and Community Noise Equivalent Level contours⁴⁶. With the exception of the North Hollywood Redevelopment Project Area generally within two miles of the Bob Hope Airport (See Table 4) and a small portion of the Vermont/Manchester Recovery Redevelopment Project Area (roughly from South Van Ness Ave. to South Gramercy PI.)⁴⁷ located within the Los Angeles International Airport (LAX) Airport Influence Area, the proposed Project would not increase the existing noise levels as the Project does not propose or authorize any specific development or modify any existing land uses. No impact would occur. No further analysis is required.

⁴⁶ Airport Land Use Commission, http://planning.lacounty.gov/aluc/, accessed April 19, 2019.

⁴⁷ Los Angeles International Airport, Airport Influence Area Map, http://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf, accessed April 19, 2019.

XIV. POPULATION AND HOUSING

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

Significant Potentially with Less Than Significant Mitigation Significant Impact Incorporated Impact No Impact \square \square \square

Less Than

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC; it does not propose or authorize development. It is not expected to induce development or otherwise alter existing development or development patterns which would induce substantial unplanned population growth in an area either directly or indirectly. As the proposed Project itself, does not consist of a development project or propose modifications to any regulations or introduce regulations that would induce unplanned population growth, less than significant impacts are expected to occur as a result of the proposed Project.

Although speculative at this point in time, should the City take a future discretionary action that would allow the TOC program to be implemented in parts or all of the Redevelopment Plan areas, in a way, that is inconsistent with CRA/LA-DLA's existing practice for the identified Redevelopment Project Areas with density limitations; creating greater housing opportunity and a more dense environment, the outcome would be consistent with the State and Citywide housing policy goals to support more housing production during California's housing crisis. If applied to the specific Redevelopment Project Areas identified in the June 27, 2018, CRA/LA-DLA memorandum, the TOC program would generally be compatible with the Framework Element and SCAGs RTP/SCS and their policies and goals for putting housing and density in areas in proximity to transit stations and along transit corridors. However, the proposed Project is not currently proposing to make inconsistent interpretations regarding the applicability of the TOC program in the identified Redevelopment Projects Areas with density limitations and it is not reasonably foreseeable at this time that the TOC program within the Project Area would differ upon Project

approval. Therefore, less than significant impacts are expected to occur as a result of the Project, no further analysis is needed.

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

Less Than Significant Impact. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. It is therefore, not expected to displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. There are several State and Citywide regulations aimed at protecting and replenishing housing units, including, but not limited to: Measure JJJ, AB 2556 as it relates to Density Bonus projects, Rent Stabilization Ordinance and the Affordable Housing Linkage Fee. Summarized below are some of the regulations aimed at protecting and replenishing housing units:

• Measure JJJ

City of Los Angeles voters approved Measure JJJ in November 2016, which added provisions to the City's municipal code to require developers of certain residential projects to either provide affordable units or pay an in-lieu fee.

Measure JJJ institutes affordable housing requirements for projects that receive a discretionary General Plan amendment, zone change, or height district change resulting in either an increase in residential density of more than 35 percent or development of a residential use where residential uses where not previously allowed.

• AB 2556

On September 27, 2014, Governor Jerry Brown signed AB 2222 as amended by AB 2556 on August 19, 2016, to amend sections of California's Density Bonus Law (Gov. Code §§ 65915). Major changes to the law are applicable to new density bonus developments resulting in a loss in existing affordable units or rent-stabilized units. The law aims to replace units and ensure rental affordability periods for 55 years.

• Rent Stabilization Ordinance (RSO)

Under certain instances buildings subject to RSO that demolish affordable rental units may replace those affordable units on a one-for-one basis or at least 20% of the total number of newly constructed rental units, whichever is greater.

• Affordable Housing Linkage Fee

Certain new market-rate residential and commercial development to generate local funding for affordable housing. The amount of the fee varies by the type of use and location. There are certain types of residential and commercial development that are exempt, however, in general, the fee is applicable to most development projects.

Currently these regulations apply to proposed development projects Citywide and will continue to be required subsequent to the adoption of the proposed Project. The proposed Project do not conflict with these regulations and they do not propose to modify any of those regulations,

therefore, less than significant impacts would occur in regards to the displacement of substantial numbers of existing people or housing which necessitate the construction of replacement housing elsewhere. No further analysis is required.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?				\boxtimes
b. Police protection?				\boxtimes
c. Schools?				\boxtimes
d. Parks?				\boxtimes
e. Other public facilities?				\boxtimes

a) Fire protection?

No Impact. The Los Angeles Fire Department (LAFD) is responsible for providing fire protection and emergency medical services to the Project Area. The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project, by itself, does not propose or authorize any development and is not expected to induce development or otherwise alter existing development or development patterns.

Table 6, LAFD Fire Stations Serving the Project Area, provides the LAFD Fire stations within close proximity of each of the 19 unexpired Redevelopment Project Areas. As the Project would not foreseeably result in any increase in population, it is not anticipated that the LAFD would require any additional staffing or need to construct any new or physically altered facilities as a result of the Project. No impacts to fire and emergency services would occur as a result of the Project. No further analysis is required.

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b) Police protection?

No Impact. The LAPD is responsible for providing police protection services to the Project Area. **Table 7, LAPD Police Stations Serving the Project Area**, lists the LAPD stations within close proximity to the Project Area. As the Project would not foreseeably induce or result in population growth in the Project Area, it is expected that no new or physically altered police facilities would be necessary to be constructed as a result of the Project. Impacts to police services would be less than significant. No further analysis is required.

Redevelopment Project Area	Police Station Division Name	Precinct
Adelante Eastside	Hollenbeck	4
Adeiante Eastside	Newton	13
Due estructure (Mercele estern	77th Street	12
Broadway / Manchester	Southeast	18
Central Industrial	Central	1
Central Industrial	Newton	13
Chinatown	Central	1
Chinatown	Northeast	11
	Central	1
City Center	Newton	13
	Rampart	2
	77th Street	12
Council District 9	Central	1
Council District 9	Newton	13
	Southwest	3
Crenshaw / Slauson	77th Street	12
Crenshaw	77th Street	12
Creitsitaw	Southwest	3
Exposition / University Park	Southwest	3
Hollywood	Hollywood	6
Laurel Canyon Commercial Corridor	North Hollywood	15
	Olympic	20
Mid City Recovery	Southwest	3
	Wilshire	7
North Hollywood	North Hollywood	15
Pacific Corridor	Harbor	5
Vermont / Manchester Recovery	77th Street	12
Vermonit / Wanchester Recovery	Southeast	18
Watts Corridors Recovery	Southeast	18
Western / Slauson	77th Street	12
Western / Slauson	Southwest	3
Westlake Recovery	Olympic	20
	Rampart	2
	Hollywood	6
Wilshire Center / Koreatown	Olympic	20
Source: City of Los Angeles Department of City Planning, Geog	Rampart	2

Table 7: LAPD Stations Serving the Project Area

c) Schools?

No Impact. The Project Area is located within the boundaries of the Los Angeles Unified School District (LAUSD), which has approximately 1,323 schools and centers for students to enroll and apply⁴⁸. The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project would not change any existing uses or alter existing development or development patterns which would introduce any new population into the Project Area requiring the construction of new or physically altered school

⁴⁸ Los Angeles Unified School District, https://achieve.lausd.net/, accessed April 11, 2019

facilities. Thus, there would be no impacts to the elementary, middle, and high schools that serve the Project Area. No further analysis is required.

d) Parks?

No Impact. A significant impact would occur if the Project resulted in substantial population growth that would generate a demand for recreation and park services requiring the construction of new or physically altered park facilities within the Project Area which extends throughout the City of Los Angeles. The Department of Recreation and Parks operates and maintains over 16,000 acres of parkland and 444 park sites⁴⁹. The Project is not expected to induce development or otherwise alter existing development or development patterns which would result in a substantial population growth. Further, the Project, by itself, does not propose or authorize any development. Impacts on park and recreation facilities would be less than significant. No further analysis is required.

e) Other public facilities?

No Impact. A significant impact would occur if the Project includes substantial population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Area. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services. LAPL provides services at 72 locations located throughout the City⁵⁰. There would not be a substantial increase in population associated with the Project, thus, there would be no need for additional library resources or facilities to be constructed. There would be no impacts, no further analysis is required.

⁴⁹ Department of Recreation and Parks, https://www.laparks.org/department/who-we-are, accessed April 11, 2019

⁵⁰ Los Angeles Public Library, Library Directory, https://www.lapl.org/sites/default/files/media/pdf/about/branch_map.pdf, accessed April 11, 2019

XVI. RECREATION

а.

b.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
•	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?					
•	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				\boxtimes	

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

No Impact. A significant impact would occur if the Project resulted in substantial population growth that would generate a demand for recreation and park services such that substantial physical deterioration of the park facilities would occur or be accelerated. The Department of Recreation and Parks operates and maintains over 16,000 acres of parkland and 444 park sites⁵¹. Additionally, the Project Area is located near many regional parks including Los Angeles State Historic Park and Exposition Park. The Project is not expected to induce development or otherwise alter existing development or development patterns which would result in a substantial population growth. Further, the Project, by itself, does not propose or authorize any development. There would be no impacts on park and recreation facilities. No further analysis is required.

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

No Impact. A significant impact would occur if the Project resulted in substantial population growth that would generate a demand for recreation and park services requiring the construction of new or physically altered park facilities within the Project Area. The Department of Recreation and Parks operates and maintains hundreds of athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, and 12 museums located throughout the City⁵². The Project is not expected to induce development or otherwise alter existing development or development patterns which would result in a substantial population growth. Further, the Project,

⁵¹ Department of Recreation and Parks, https://www.laparks.org/department/who-we-are, accessed April 11, 2019

⁵² Department of Recreation and Parks, https://www.laparks.org/department/who-we-are, accessed April 11, 2019

by itself, does not propose or authorize any development. No impacts on park and recreation facilities would occur. No further analysis is required.

XVII. TRANSPORTATION⁵³

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? 			\boxtimes	
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				\boxtimes
d. Result in inadequate emergency access?				\boxtimes

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

Less Than Significant Impact. The Project itself does not propose or authorize development. Traffic volumes are not expected to significantly increase as a result of the proposed Project. Future development projects would continue to be reviewed for conformance with the applicable Redevelopment Plan and would continue to be subject to their own environmental review in accordance with CEQA guidelines.

Traffic associated with the Project is not reasonably foreseeable to increase existing vehicle trips associated with the existing land uses of commercial, industrial/manufacturing, residential, mixed use developments, public facilities, and open space as the proposed project does not change any existing land uses or alter existing development or development patterns. The proposed Project itself, does not increase density or provide incentives that would increase the density or FAR of a site. The Project is not expected to generate significant traffic impacts, which would conflict with an applicable plan, ordinance or policy, related with traffic. It is expected new development would only occur in areas currently zoned for those allowed uses as the Project does not modify or expand existing allowable land uses. Future development projects that seek zone changes or

⁵³ Until the City has adopted new Transportation thresholds (or July 1, 2020, whichever is sooner), question b will remain unchanged. Once new thresholds have been adopted, the Initial Study will be updated to reflect the 2019 Appendix G for question b.

expand an existing allowable land use would need to go through the City's discretionary review process in addition to any processes as required by the applicable Redevelopment Plan. It is not reasonably foreseeable that the Project will cause significantly new construction as the Redevelopment Regulations have always been part of the regulatory framework in the Project Area. Future development projects in the Project Area would continue to be evaluated on an individual case-by-case basis. The Project does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns, therefore, impacts would be less than significant.

b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact. The Congestion Management Program (CMP) in effect in Los Angeles County was issued by the Los Angeles County Metropolitan Transportation Agency in 2010. The CMP is intended to address the impact of local growth on the regional transportation system. The CMP Traffic Impact Analysis (TIA) Guidelines require intersection analyses if a project will add 50 or more trips during either the AM or PM weekday peak hours, or, arterial segments are analyzed if the proposed project will add 50 or more peak hour trips (total of both directions). The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project, by itself, does not propose or authorize any development. It is not reasonably foreseeable that the Project will significantly induce development as the proposed resolution and ordinance do not increase density, height, FAR, or change any allowable land uses. Future development projects would be subject to their environmental review as part of the Redevelopment Plan Project review process. No impact would occur and no further analysis is required.

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

No Impact. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project does not propose or authorize development. Therefore, no changes would be made to the local vehicular circulations routes and patterns, or impede public access or travel on any public rightsof-way as part of the Project. No impacts related to hazards due to a design feature or incompatible uses would occur. No further analysis is required.

d) Result in inadequate emergency access?

No Impact. As discussed in **Section IX (f)**, Hazards and Hazardous Materials, the Project Area is largely along major transit corridors and includes designated disaster routes. The Project by itself does not propose or authorize any development. The Project would not require the closure of any public or private streets, and therefore, would not impede emergency vehicle access to the Project site or surrounding area. No impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES

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

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				
b.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native				

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

No Impact. Section 5020.1(k) of the Public Resources Code defines "Local register of historical resources" as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. In the City of Los Angeles, local buildings and sites that meet specific criteria for designation can be declared a "Historic-Cultural Monument (HCM)" by the City Council after recommendation from the Cultural Heritage Commission. There are no "tribal cultural resources" as defined in the Public Resources Code Section 21074 that are designated HCMs in the Project Area.

Further, Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and

American tribe.

culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. In compliance with the requirements of AB 52, the City provided formal notification of the Project on May 3, 2019. Letters were sent via certified mail to the following California Native American tribes:

- Fernandeño Tataviam Band of Mission Indians
- Gabrieleño Band of Mission Indians Kizh Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrielino-Tongva Tribe
- San Fernando Band of Mission Indians
- Soboba Band of Luiseño Indians
- Torres Martinez Desert Cahuilla Indians

No Tribe requested consultation within the 30-day time limit to respond. To date, additional information and materials related to tribal cultural resources have not been submitted.

The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project does not consist of any proposed development projects, includes no ground disturbing activity or any related construction activity. It is not expected to induce development or otherwise alter existing development or development patterns, therefore, there is no impact.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource to a California Native American tribe?

No Impact. See response to **Section XVIII (a)** above. Further, future development projects requiring a Negative Declaration, Mitigated Negative Declaration or an Environmental Impact Report will need to comply with AB 52 and conduct the necessary research and/or prepare the necessary reports to determine if the individual development project would cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, because the Project does not consist of any proposed development projects, includes no ground disturbing activity or any related construction activity, or propose modifications to regulations pursuant to CEQA guidelines, and is not expected to result in changes to development patterns or induce development or construction activities, there is no impact, no further analysis is required.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- 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?
- 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?
- e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

No Impact. The Project does not propose or authorize development. The Project itself is not intensifying any of the existing allowable land uses, thus, existing conditions are not expected to significantly change related to public facilities. Any future development would be restricted to the existing allowable land uses and expected to be within the growth in the City of Los Angeles and region. Future development projects would be reviewed on a case-by-case basis through the Redevelopment Project review process. Any City Planning administrative or discretionary review (depending on the scope of the development project) would be subject to its own environmental review. Therefore, it is not reasonably foreseeable that the proposed Project would increase the demand for water and the generation of wastewater, consequently increasing the demand of

treatment facilities compared to existing conditions such that physical expansion of the treatment facilities or construction of a new treatment facility may be required. Additionally, implementation of the proposed Project would not increase consumption of electrical power and natural gas such that existing supply facilities may need to be expanded or relocated. Similiarily, telecommunications facilities would not need to be expanded or relocated as the proposed Project itself does not propose or authorize development. Therefore, because the proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. No impact would occur.

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

Less Than Significant Impact. As described in Section X, Hydrology and Water Quality, the Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. As the Project Area is located within the urban environment, it is likely that any future development within the Project Area would be connected to the City's water line and serviced by LADWP. A significant impact would occur if LADWP was unable to provide water service to the Project Area. Water is supplied to the City from four primary sources, the Metropolitan Water District (MWD); the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct, local groundwater, and recycled water⁵⁴. The Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC; and does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. Therefore, it is not reasonably foreseeable that there would be insufficient water supplies available to serve the Project Area and future development in the Project Area during the normal, dry, and multiple dry years. Less than significant impacts would occur, no further analysis is needed.

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

No Impact. See response to **Section XIX (a)** above. Further, LADWP conducts water planning based on population growth forecast. The Project is not anticipated to induce population growth in the City, therefore, it will not change demand of water or wastewater treatment. As mentioned, the Project, by itself, does not propose or authorize any development and is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project does not propose or authorize development. The proposed

⁵⁴ Los Angeles Department of Water and Power - Water: Facts and Figures, Briefing Book 2017-2018, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrlstate= 18i8d8hpzl_21&_afrLoop=430938015435485, accessed April 10, 2019.

Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. No impact will occur.

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

Less Than Significant Impact. The Los Angeles Bureau of Sanitation and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the Project Area. Any future construction activities that could reasonably be associated with development that occur pursuant to the Project would generate inert waste. Construction waste materials are expected to be typical construction debris, including wood, paper, glass, plastic, metals, cardboard and green wastes. Pursuant to the California Green Building Code, individual project applicants would be required to recycle/divert 65 percent of the construction waste. However, the amount of waste created would not be substantial as the Project, by itself, does not propose or authorize any development. Waste generated by individual development projects would be assessed on a case-by-case basis through the environmental review process. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. Therefore, the impact is less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project, by itself, does not propose or authorize any development. Individual development projects which would reasonably occur subsequent to the adoption and implementation of the proposed Project is currently required and would continue to be required to comply with all federal, state, and local statutes and regulations related to solid waste. The Project does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. All applicable regulations would ensure that the impact is less than significant.

XX. WILDFIRE

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

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				\boxtimes
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?				
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?				
 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?

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

No Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities. According to the Safety Element, the Project Area is located along some designated disaster routes⁵⁵.

The proposed Project does not propose or authorize development nor does it modify any existing regulations regarding permanent street closures, uses, intensities, or densities of development which may directly or indirectly impair an adopted emergency response plan or emergency evacuation plan. Further, future development that would occur in the Project Area would be confined to a site and during construction the proposed development project would need to comply construction management plans that would be implemented to ensure adequate circulation and emergency access. The Project does not propose or authorize development. The

⁵⁵ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, pg. 61

proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. Therefore, the proposed Project itself would not impair an adopted emergency response plan or emergency evacuation plan, no impacts would occur, no further analysis is needed.

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

Less Than Significant Impact. As described in Section IX (g), the Project Area is located within a highly urbanized area and exposure to wildfire is generally identified to be the Very High Fire Hazard Severity Zone comprised mostly of hilly and mountainous regions of the City which does not include a majority of the Project Area (See Figure 4: Very High Fire Hazard Severity Zones). The City's Safety General Plan Element Exhibit D, Selected Wildfire Hazard Areas[™], also identifies some additional Wildfire Hazard Areas throughout the City which could potentially expose the Project Area occupants to wildfire. These potential wildfire hazard areas are speculative and is not intended to designate their relative risk. The Selected Wildfire Hazard Areas are categorized as Selected Wildland Fire Hazards and Selected Urban Fire and Secondary Hazards. These Selected Urban Fire and Secondary Hazards are generally overlap more of the Project Area than the Wildland Fire Hazards areas which, as mentioned, is generally comprised of the hilly and mountainous regions of the City. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. The Project does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns, including in Wildfire Hazard Areas. Therefore, impacts would be less than significant, no further analysis is needed.

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

No Impact. The proposed Project does not propose or authorize development and it is not reasonably foreseeable that the proposed Project would induce construction. The proposed Project is limited to the transfer of land use authority from the CRA/LA-DLA to the City; establishment of procedures for the implementation of the Redevelopment Regulations; and clarification of references to the former CRA/LA in the LAMC. Given the Project's scope, no impacts would occur that would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No further analysis is needed.

⁵⁶ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit D, November 26, 1996, p.53.

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

Less Than Significant Impact. As discussed in Section IX (g) and Section XX (b) above, very small portions of the Project Area are located within a City-designated Very High Fire Hazard Severity Zone and/or near a City-designated Fire Buffer Zone. The Project does not propose or authorize development and is intended to facilitate the transfer of land use authority. Any future development would be required to be developed in accordance with LAMC requirements pertaining to fire safety. The Project does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns. Less than significant impacts would occur, no further analysis is needed.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?

No Impact. As described in **Section IV Biological Resources**, the Project Area is in an urbanized setting and is not generally within the vicinity of Inland Habitats, SEAs, Wildlife Corridors, Ocean or Coastal Wetlands which support fish or wildlife or rare/endangered plant species. Further, the proposed Project primarily transfers the land use authority of the CRA/LA-DLA to the City and modifies the LAMC to facilitate the transfer of land use authority and does not consist of a development nor does it propose or authorize development. Given the proposed Project's limited scope, it is not expected to induce construction or ground disturbing activity which may directly or indirectly degrade the quality of the environment. Therefore, no impacts would occur, no further analysis is needed.

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

No Impact. The Project, which transfers the land use authority of the CRA/LA-DLA to the City, establishes procedures for the implementation of the Redevelopment Plans within the LAMC and updates relevant sections of the LAMC referencing the CRA/LA, by themselves, does not propose or authorize any development or construction activities. Additionally, the proposed Project itself, does not change any land uses, increase any building heights, densities or intensities. The proposed Project will consolidate the land use authority of the CRA/LA-DLA with the City. Pursuant to ABX1 26, redevelopment agencies officially dissolved, however, it did not eliminate the land use regulations of the former CRA/LA's Redevelopment Plans. Currently, development projects located within a Redevelopment Project Area are subject to review by both the CRA/LA-DLA and the City. Since ABX1 26, the primary role of the CRA/LA-DLA has been to wind down its operations including performing activities related to enforceable obligations, disposing its assets, and making payments on bonds and loans. As such, the CRA/LA-DLA's capacity to implement the land use related plans and functions continues to be limited. Consolidation of land use authority would facilitate the CRA/LA-DLA's wind down pursuant to ABX1 26 and streamline the process for future development ensuring continuity in the implementation of the land use provisions of the Redevelopment Plans.

The transfer of related land use plans and functions and associated amendments to the LAMC is not expected to generate cumulative impacts. The Project does not promote, authorize or incentivize new development. The proposed resolution and ordinance serves to consolidate local control over land use policy within its City boundaries. Therefore, an accumulation of similar ordinances to this effect would serve only add review processes. Therefore, no impact would occur, no further analysis is needed.

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

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

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