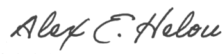


CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: July 27, 2026

TO: Energy and Environment Committee
Honorable Adrin Nazarian, Chair
Honorable Katy Yaroslavsky, Vice Chair
Honorable Ysabel Jurado, Member
Honorable Nithya Raman, Member
Honorable Imelda Padilla, Member

FROM: For  Sarai Bhaga, Interim Director and General Manager
Los Angeles Sanitation and Environment

For
Vincent P. Bertoni, AICP, Director of Planning 
Los Angeles Department of City Planning

Osama Younan, P.E., General Manager
Los Angeles Department of Building & Safety



SUBJECT: REPORT BACK ON CLEAN UP GREEN UP (CUGU) / PROGRAM EXPANSION / MARGINALIZED COMMUNITIES / ENVIRONMENTAL IMPACT([CF 15-1026-S1](#))

On August 29, 2025, the City Council adopted Motion Council File 15-1026-S1, relative to the Clean Up Green Up (CUGU) Program Expansion, marginalized communities, and environmental impacts. The Motion instructed the Bureau of Sanitation, Department of City Planning (DCP), and the Los Angeles Department of Building and Safety (LADBS), including its Local Enforcement Agency, to report on lessons learned since the adoption of CUGU Ordinance No. 184246 and the resources needed to expand the program to additional areas or provide more in-depth solutions to incompatible land uses that unfairly impact longstanding communities. **The Motion further instructed the Departments to address the following:**

- a. Strategies to incorporate the regulations set forth in the CUGU Ordinance into the development of community plans.
- b. Ways to modernize or replace Zoning Information (ZI) No. 2355, which pre-dates CUGU and is not currently enforced in a substantial way.
- c. An equity analysis to assess whether CUGU has measurably improved outcomes in Sun Valley, Pacoima, Wilmington, and Boyle Heights.
- d. An analysis of all CUGU cases implemented since the Ordinance took effect.

e. Recommendations for legislative and procedural changes to strengthen CUGU and provide robust environmental protections, community notification, business support, implementation, and enforcement.

This report provides a coordinated response from LA Sanitation and Environment (LASAN), the Department of City Planning (DCP), and the Los Angeles Department of Building and Safety (LADBS) to each of the Council's directives.

RECOMMENDATIONS FOR COUNCIL ACTION

1. Note and file this report as an informational response to Council File 15-1026-S1.

SUMMARY

In 2016, the LA City Council established the CUGU Program by way of Ordinances 184245 and 184246. These Ordinances were established with the support from the community grassroots organizations collectively called LA Collaborative. LA Collaborative works with residents, academic partners, and foundations to document the problem of the over-concentration of polluting land uses adjacent to homes, schools, parks, and other sensitive uses in the LA communities of Boyle Heights, Pacoima/Sun Valley, and Wilmington (also referred to as the Harbor).

Since the adoption of the CUGU ordinance, LASAN, DCP, and LADBS have been actively working to reduce pollution burdens in designated Environmental Justice (EJ) communities through their various roles and responsibilities. Each Department's role varies in the implementation of CUGU and any future expansion of the program should be specific to the Department's oversight.

LADBS enforces CUGU regulations through permit review and inspections of development projects in these areas. LASAN conducts CUGU canvassing of businesses, addresses pollution, manages waste, and works to improve public health in affected communities. DCP has been actively updating community plans with a new zoning code to incorporate best practices to mitigate incompatible land uses; this work expands and embeds EJ standards into all community plan areas as their land use and zoning designations are updated. DCP also conducts compliance reviews for sites designated as CUGU Zones and provides overall implementation of environmental strategies. An equity analysis of CUGU zones highlights LASAN's significant contributions since 2016, including thousands of inspections, infrastructure projects, brownfield cleanups, illegal dumping abatement, and interagency enforcement. Between 2016 and 2025, LADBS processed 2,538 building permits applications requiring CUGU clearance: 555 were approved, 454 are pending, 1,527 were exempt/not applicable/not required, and two were denied. 1,594 of those permit applications were issued.

Due to significant budgetary constraints, the City Council deleted the dedicated CUGU Ombudsperson authority in the 25/26 FY budget and thus no further work on this program has been achieved since July 1, 2025.

The primary recommendation from LASAN is the creation of an EJ training program for all City personnel. This training would draw on insights gleaned from the CUGU Program, with the ultimate objective of embedding environmental justice principles into the core operations of every City Department. The suggested areas for City Departments to consider in regards to EJ are: Environmental Justice Dashboard; Business Compliance; Community Engagement; and Funding.

DEPARTMENT RESPONSES TO MOTION

Los Angeles Department of City Planning (DCP)

DCP is responsible for integrating CUGU into long range urban planning, zoning, and development standards, ensuring a balance between urban growth and environmental health within CUGU zones. DCP has been actively updating community plans to incorporate best practices for mitigating incompatible land uses directly into the new zoning code, thereby embedding EJ standards into all community plan areas as their land use and zoning designations are updated. DCP serves as the key authority for implementing and it reviews the implementation of the CUGU Overlay District regulations. The Department responsibilities are to provide compliance review for sites designated as CUGU Zones and provide overall implementation of environmental strategies. The purpose of the compliance review is to confirm that a proposed project meets the applicable CUGU development regulations before a building permit can be issued. When a proposed project is not in full compliance with the program regulations, its size, use, or location may trigger an additional formal review and changes to the plans. As an environmental strategy, the CUGU program works to reduce cumulative health impacts by establishing and reviewing strict development standards for heavy, noxious uses near residential and sensitive areas in communities.

Los Angeles Department of Building and Safety (LADBS)

The role of LADBS in the CUGU Program is to be responsible for the approval of building permit applications for construction and development on private property. The permit process ensures compliance with state and local laws when undertaking any work or construction that requires a building permit, such as the California Building Standards Code (Title 24) and the Los Angeles Municipal Code (LAMC). The process in which the project scope is reviewed for code compliance is called the plan check process. Within the plan check process approval from other City Departments and agencies are required before a permit can be issued. As part of the LADBS plan check review process, a Clearance Summary Worksheet will be provided to the permit applicant that lists all of the required clearances which need to be approved by other agencies along with their contact information.

Los Angeles Sanitation and Environment (LASAN)

LASAN's role in the CUGU Program, as a part of the broader Environmental Justice Program, promotes public health, community cleanliness, and business prosperity through pollution prevention, reduction, and economic revitalization. Initially focused on land use, CUGU expanded its implementation via an Ombudsperson role to address cumulative health impacts, foster synergy with "LA Industry", improve environmental compliance, increase resource

accessibility, support civic engagement, lead working groups, and enhance inter-agency relationships.

The following sections will highlight major accomplishments since the Ordinance was passed, including enforcement actions, legislative/regulatory improvements, and community benefits. Additionally, it will provide updates on current CUGU program initiatives, outlining how these three Departments are implementing the ordinance and its programs, tracking environmental improvements, and engaging in public outreach to keep residents informed about their community's environmental health. Please refer to **Appendix A** for more details mentioned in this section.

DEPARTMENT RESPONSES TO MOTION

A. Strategies to Incorporate the Regulations Set Forth in the CUGU Ordinance in the Development of Community Plans

Implementation of CUGU through Community Plan Updates

The CUGU Ordinance was initially established as a Supplemental Use District under the Original Zoning Code (LAMC Section 13.18) and is now being absorbed into the New Zoning Code (Chapter 1A) through the ongoing Community Plan Update process. As each of the city's 35 Community Plans are updated, CUGU's regulatory and policy objectives transition from being supplemental to baseline zoning standards of the municipal code. One of the key components of CUGU was elevating and validating the input of community and advocate groups. With the shift from a one-off pilot Supplemental Use District to a baseline in all zoning standards, this takes the burden off of community and advocacy groups in other Environmental Justice communities and places the responsibility on the Planning Processes to ensure that every community is realizing the benefits of that inaugural effort under CUGU. This is evident in the updated Boyle Heights Community Plan and Harbor Los Angeles Community Plans. Subsequently, other community plans will also incorporate similar CUGU-related policies and objectives in the future. Elevating environmental justice community voices to the level of consistent policy implementation was one of the key goals of the CUGU work program and as such has created a lasting impact on future planning efforts in the City.

Boyle Heights Community Plan

The Boyle Heights Community Plan Update proposes specific district standards for Industrial and Industrial-Mixed Use Districts, mirroring those found in Downtown Los Angeles' New Zoning Code. The CUGU program significantly influences urban design standards and establishes limitations within the New Zoning Code. These zoning standards implement landscape requirements, including buffering, to separate noxious and sensitive uses. To prevent over-concentration of uses, locational standards mandate that mechanical equipment and loading areas be kept away from sensitive areas. Furthermore, the CUGU program led to changes in the Building Code, requiring specific air filtration methods for residential projects near freeways. This air filtration standard is now a citywide requirement. The City Council approved the Boyle Heights Community Plan Update on September 25, 2024 and its final ordinances are currently under legal review by the City Attorney's Office before final adoption and effectuation.

Harbor Los Angeles Community Plans

The Harbor Los Angeles Community Plans, initiated in 2018, update the Wilmington-Harbor City and Harbor Gateway plans. They remove Wilmington from the CUGU Overlay by integrating CUGU regulations into new, area-specific Industrial-Mixed and Industrial Use Districts. These districts refine definitions of heavy commercial/industrial uses and incorporate CUGU-inspired standards (distancing, screening) plan-wide, promoting a shift from heavier to light industrial uses and preventing new heavier industrial uses near residential/sensitive areas to minimize negative impacts. Beyond zoning, the Plans propose new policies and an Environmental Justice Chapter. This chapter addresses land use, public health, and the environment through an equity lens, considering existing conflicts and evolving planning priorities. By embedding the CUGU regulations in the new zoning districts, it allows these standards to be applicable plan wide and in both Plan Areas, whereas it's currently only applicable to the Wilmington community.

The two Harbor Plans were approved by the City Council on September 9, 2025. They are currently undergoing legal review with the City Attorney's Office before final adoption and effectuation.

Pacoima/Sun Valley Los Angeles Community Plans

The Arleta-Pacoima and Sun Valley-La Tuna Canyon Community Plans were last updated in 1996 and 1999, respectively. CUGU regulations will remain in place until these plans are updated as part of the Community Plan Update program and implementation of the new zoning code. At that point, regulations will be absorbed and integrated into new Industrial Use Districts using the new, adapted zoning regulations. Strategies and tools to be used will be informed by the work conducted on the Boyle Heights and Harbor Community Plans work programs coupled with supplemental area specific regulations. The expectation is to initiate these plans once work on community plans in the South Valley have concluded in the 2027 timeframe.

For more information on the Los Angeles Community Plans please refer to **Appendix A**.

Integration of Environmental Justice into LASAN Operations

Although LASAN does not contribute to the development of community plans, the CUGU Program has influenced and shaped LASAN's operational procedures, education, and services. The CUGU Program at LASAN has undergone significant evolution, resulting in the development of several distinct initiatives. These include the CUGU Canvassing Inspection Form, comprehensive EJ training for all LASAN employees, and the Green Talks Showcase, a sustainability education series specifically designed to serve CUGU communities. A summary of these programs is provided below; full details can be viewed in **Appendix A**.

CUGU Canvassing

The Industrial Waste Management Division (IWMD) has developed the CUGU Canvassing Inspection Form to systematically inspect businesses within CUGU areas and ensure compliance with environmental regulations. In fiscal year 2023-2024, IWMD completed a total of 229 CUGU canvassing inspections in CUGU Zones reviewing all aspects of these businesses and providing referrals to external agencies if needed. IWMD also performed an additional 243

regular canvassing inspections for unpermitted facilities in CUGU Zones. These two types of inspections combine to a total of 472 LASAN inspections of businesses in CUGU Zones.

EJ Training for LASAN Staff

LASAN prioritizes EJ training for all employees, integrating it into onboarding for new hires and providing ongoing workshops for existing staff. Over the last two years, five training sessions have been held for both staff and students. Future plans include interactive elements like field visits and community-led tours, contingent upon budgetary support.

Green Talks Showcase

Launched in April 2025, the Green Talks Showcase, a sustainability education series by DCP and LASAN, targets Disadvantaged Communities (DACs). Promesa Boyle Heights hosted four sessions (Composting, Zero Waste, Stormwater Reuse, Tree Care). The South Bay Center for Counseling also requested a Composting Workshop. The program was paused in June 2025 due to budget and safety concerns.

B. Ways to Modernize or Replace ZI-2355, Which Pre-Dates CUGU and is Not Currently Enforced in a Substantial Way

Overview of ZI-2355

Zoning Information (ZI) No. 2355 predates the adoption of the CUGU Ordinance and serves to notify the respective Council Offices when certain industrial land uses are proposed including landfills, waste transfer stations, auto dismantling or recycling facilities, solid waste vehicle yards, green waste facilities and other uses that include hazardous materials. ZI-2355 suggests that mitigation measures may be recommended as a condition of project approval. In situations where discretionary entitlement actions are required, the City does maintain the authority to impose such conditions of approval and CEQA-required mitigation measures to reduce environmental impacts associated with such industrial operations. However, ZI-2355 is limited in circumstances where the Zoning Code allows industrial uses as by-right (or ministerial) which restricts the City's ability to impose requirements as part of the permitting process. The CUGU Overlay has standards which incorporate best practices into the zoning review processes, but even that is through an additional Planning clearance.

Going forward, the New Zoning Code takes these basic best practices and embeds them into the base zoning regulations so that the uses outlined in the ZI are required to provide these zoning, design, and development practices that are predicated on mitigating adjacent and incompatible land uses to improve public health, for both by-right and discretionary processes. In this way, a higher benchmark is established requiring the land use in question to adhere to best practice development standards anywhere in the City with the New Zoning Code via the Community Plan update processes, making the EJ standards mainstream.

Please refer to **Appendix B** for more details on the Case Study: CUGU Review and Environmental Justice ZI-2355 Review.

Analysis of CUGU-related Cases

Of the 51 CUGU-related cases reviewed across three levels, approximately 68% received approval. Analyzing the type of cases submitted indicates a slight disparity in approval rates. Housing-related (including improvements) cases demonstrated a higher approval rate of approximately 71%, suggesting a marginally greater likelihood of approval compared to non-housing cases, which had a lower approval rate of 57%. This data implies that the scope of work associated with housing projects may benefit from a slightly more favorable review outcome.

As noted in the preceding sections related to the cases filing, the review process encompasses three levels: Administrative, Director, and Area Planning Commission. These levels incorporate processes ranging from expedited reviews without public hearings (clearance or administrative review) to those that may trigger a public hearing via an appeal or final project approval (Director and Area Planning Commission approvals). It should be noted that the review of cases do not include sites that bypass one of the three levels of review, such as a clearance sign-off for compliance.

LADBS will continue to plan check review, issue project clearances and implement any modernizations or replacements to ZI-2355.

C. Equity Analysis to Assess Whether CUGU Has Measurably Improved Outcomes in Sun Valley, Pacoima, Wilmington, and Boyle Heights

LASAN has implemented a range of inspections, enforcement actions, infrastructure projects, brownfield cleanups, illegal dumping cleanups, and programmatic initiatives since the adoption of the CUGU Ordinance in 2016. These efforts are summarized below and the full descriptions can be found in **Appendix C**.

- **Industrial Waste Management Compliance Efforts**

In fiscal year 2023-2024, IWMD completed a total of 229 CUGU canvassing inspections reviewing all aspects of these businesses in CUGU Zones. (Please refer to Appendix A for more information on this first item.)

- **Safe Clean Water Program**

The Safe Clean Water Implementation Division (SCWID) of LASAN is currently implementing six projects within CUGU areas and 12 projects within areas with a CalEnviroScreen 4.0 score greater than 85%.

For calendar year 2024, the Watershed Protection Division conducted a total of 202 citations in CUGU Areas. In addition, 40 water quality improvement projects have been delivered or are underway in environmental justice communities across Los Angeles.

- **Tree Planting**

In 2024, LASAN planted 1,239 street trees, sequestered 3,364.59 metric tons of CO₂, removed 22,029 square feet of concrete for new tree wells, and maintained 2,657 trees. LASAN invested \$1,831,688 in communities with high socioeconomic and environmental burdens.

Program Highlight - [Seeing more trees in Boyle Heights lately? Here's why](#)

- ***Citywide Brownfields Program, including the impact of the Exide Battery Plant on LA Communities***

This year, LASAN completed nine environmental assessments at various future redevelopment sites and currently have five remediation projects underway. Since 2012, the LASAN Brownfields Team has conducted 29 environmental assessments and remediated three Brownfields in CUGU Zones. To further support these efforts, LASAN applied for a \$2 million USEPA Cleanup Grant and a \$500,000 USEPA Community-Wide Assessment Grant, with funding announcements pending.

- ***Illegal Dumping Waste Cleanups***

In 2024, cleanup efforts resulted in the removal of 17,680 tons of illegally dumped waste, including 7,890 tons of solid waste and 234 tons of hazardous waste.

- ***Reusable Foodware and Greening Businesses***

In its initial phase, the program successfully converted 120 businesses to utilize reusable foodware in their business practices.

- ***Interagency Collaboration***

LASAN actively collaborates with DCP, LADBS, and other City agencies to share environmental compliance data, support land use decisions, and ensure that environmental health and environmental justice considerations are incorporated into ongoing community planning processes.

D. Analysis of All CUGU Cases Implemented Since the Ordinance Was Put Into Effect

Overview of sites subject to CUGU regulations

The City Planning Department is tasked with implementing and conducting the review of sites subject to CUGU regulations. Of the 3,704 CUGU properties in Los Angeles there are only 51 sites that have undergone one of the three CUGU review levels of review: Administrative, Director-level, or Area Planning Commission. The administrative review process is the primary pathway for CUGU cases, accounting for the majority of filings and approvals with a high overall success rate, in contrast higher-level reviews see significantly fewer cases.

Below is an overview of the key steps that applicants undergo to determine the appropriate route to filing. For more detailed instructions on how to obtain City Planning clearances, see [Zoning Information \(ZI\) No. 2458](#).

- **Determine Applicability:** Check if the project meets the CUGU Qualifying Criteria (e.g., a New Construction, Addition, Major Improvement, or Change of Use) in one of the required Project Contexts (e.g., Subject Use adjacent to a Publicly Habitable Space).
- **Complete Checklist:** Complete the appropriate CUGU Application and Checklist form(s) (e.g., [CP-7829](#), [CP-7830](#), [CP-7831](#)) and include them on the drawing set.
- **Obtain Administrative Clearance:** Submit the plans to City Planning's Development Services Center for ministerial review to confirm compliance with all CUGU development standards.
- **Pay Fee:** An Administrative Review fee is required.
- **Entitlement Action (If necessary):** If the project deviates by 20% or more from a CUGU regulation, a Director level of Area Planning Commission entitlement is required.

- **Final Permit:** Once clearance is obtained, the applicant can proceed to LADBS for the building permit.

The CUGU Ordinance is a clearance which requires DCP approval if the project meets the Qualifying Criteria outlined below. LADBS staff assesses if a project is subject to the CUGU clearance based on [Zoning Information \(ZI\) No. 2458](#) instructions and if required, LADBS staff will add the CUGU clearance. No building permit shall be issued for any development that meets the Qualifying Criteria within the mapped CUGU Supplemental Use District boundaries until the DCP, Development Services Center has approved the CUGU Administrative Clearance.

Qualifying Criteria:

A project that satisfies at least one criteria under the “Project Type” list below, and at least one criteria under the “Project Context” list below shall comply with the provisions of CUGU.

1. PROJECT TYPE.

- (a) NEW. The construction of a new stand-alone building.
- (b) MAJOR IMPROVEMENT. The alteration of any building(s) or structure(s) on a project site which does not expand the building(s) or structure(s), and for which the aggregate value of the alterations within any 24-month period exceeds 50 percent of the replacement cost of the building(s) and structure(s) on the project site, as determined by the Department of Building and Safety.
- (c) ADDITION. The expansion of any existing building(s) or structure(s), with or without other alterations to the building(s) or structure(s), on a project site in which the total aggregate value of work in any 24-month period exceeds 50 percent of the replacement cost of all buildings and structures on the entire project site, as determined by the Department of Building and Safety.
- (d) CHANGE OF USE. The expansion of or change to a use on the Subject Use list under Section 13.18. E.2(d) of the Ordinance.

2. PROJECT CONTEXT.

- (a) Project is a municipal project located within 1,000 feet of a Freeway or State Route specified in LAMC Section 13.18.F.4.
- (b) Project is a Publicly Habitable Space adjacent to a Subject Use.
- (c) Primary use of site is a Subject Use adjacent to a Publicly Habitable Space.
- (d) Primary use of site is a Subject Use.

Implementation measures and staff instructions for LADBS and DCP were issued via an interdepartmental memo published on June 22, 2016.

The DCP Clearance Status covering Permit Submittal Year from 2016 to 2025 includes a total of:

- 555 Approved, Approved with Conditions
- 454 Pending
- 1,527 Exempt, Not Applicable, Not Required
- 2 Denied

There were a total of 1,594 Building Permits Issued with CUGU Clearance from 2016 to 2025. For more details on these Permits, please refer to **Appendix D**.

E. Recommendations for Legislative and Procedural Changes to Strengthen CUGU and Provide Robust Environmental Protections, Community Notifications, Business Support, as well as Implementation and Enforcement

DCP recommends sustained support of the Community Planning Program and by association steady rollout of the New Zoning Code throughout the City to enable application of the standards; following a future consideration and assessment once the rules have been in place.

LASAN recommends that the Council revisit the original CUGU Motion language and reconsider how the program can be re-envisioned to incorporate lessons learned from the past, a review of funding sources, and modern adaptations. In order for a new CUGU or EJ Program to have maximum impact the Office of the City Administrator and Office of the Chief Legislative Analyst must work to find funding sources.

LASAN recommends that the following concepts also be examined: EJ Training; Environmental Justice Dashboard; Business Compliance; Community Engagement; and Funding. Additional details regarding these recommendations are provided in **Appendix E**.

Implementation of CUGU through Community Plan Updates

- **Boyle Heights Community Plan**

All Industrial and Industrial-Mixed Use Districts proposed in Boyle Heights embed specific district standards. These standards are broadly applied to all Industrial, and Industrial-Mixed Use Districts as part of the New Zoning Code initially established in Downtown Los Angeles.

Beyond these zoning strategies, the CUGU program also influences urban design standards and limitations found in the New Zoning Code and subsequently, the Boyle Heights Community Plan update.

- **Landscape Standards:** Buffering and landscape standards are incorporated into the Community Plan area to better separate noxious uses from sensitive uses, as well as locational standards such as requiring mechanical equipment or loading areas to be oriented away from sensitive uses and noxious fumes.
- **Prevention of Over Concentration of Uses:** The New Zoning Code also provides use limitations for certain noxious uses if other similar uses exist within a defined radius.

Ultimately, the CUGU program resulted in changes to the Building Code that required specified air filtration methods for residential projects adjacent to freeways. This standard remains in effect citywide. The City Council initially adopted the Boyle Heights Community Plan on *September 25, 2024*. The plan's final ordinances were referred to the City Attorney to be finalized.

- **Harbor Los Angeles Community Plans**

The Wilmington-Harbor City and Harbor Gateway Community Plan Updates, collectively referred to as the Harbor Los Angeles Community Plans initiated in 2018, is amending the CUGU Ordinance to remove the Wilmington community from the CUGU Overlay. Similar to Boyle Heights, the Harbor LA Community Plans incorporate CUGU regulations in the proposed Development Standards Districts and Use Districts. The proposed zones include use limitations for noxious uses and landscaping requirements.

The Harbor LA Plans introduce new Industrial-Mixed and Industrial Use Districts previously not carried by the Downtown Los Angeles or Boyle Heights Community Plans. The new Use Districts are tailored to the Harbor LA communities. They refine permitted heavy commercial and industrial uses while also including Use Standards like distancing separation from a sensitive use, screening, and enclosure requirements which are inspired by the CUGU regulations. It also restricts auto-related uses and requires distance separation from sensitive uses. By embedding the CUGU regulations in the new zoning districts, it allows these standards to be applicable plan wide and in both Plan Areas, whereas it's currently only applicable to the Wilmington community.

In addition to the Harbor LA Plans permanent zoning regulations, the Plans propose new policies and include a standalone Environmental Justice Chapter to address the intersection between land use, public health, and the environment from an equity lens, as well as considering both existing land use conflicts and evolving land use planning

priorities. Both plan policies support CUGU standards and expansion, as well as the transition of industrial land uses from heavier to light industrial uses and prevention of new heavier industrial uses, in close proximity to residential and sensitive uses to minimize the negative environmental and visual impacts to the surrounding communities. The Harbor LA Plans are in the adoption phase. The Proposed Plans were approved by the City Planning Commission (CPC) on Feb. 8, 2024; subsequently a modification to the Wilmington-Harbor City Community Plan was approved by the CPC on January 23, 2025. The Proposed Plans were considered and approved by the Planning Land Use and Management (PLUM) Committee on August 26, 2025. If the PLUM Committee recommends approval of the Plans, they will be presented before the full City Council for its consideration. The City Council adopted the Harbor Los Angeles Community Plans on September 9, 2025. The implementing ordinances will move into form and legality with the City Attorney's Office to ensure clarity of regulations and consistency with state laws. Upon the completion of the City Attorney's legal review, the plans will return to the City Council for final adoption/effectuation.

- ***Pacoima/Sun Valley Los Angeles Community Plans***

The Arleta-Pacoima and Sun Valley-La Tuna Canyon Community Plans were last updated in 1996 and 1999, respectively. Existing CUGU regulations will remain in place until these plans are substantially revised as part of the Community Plan Update program and implementation of the new zoning code. At that point, regulations will be absorbed and integrated into new Industrial Use Districts using the new, adapted zoning regulations. Strategies and tools to be used will be informed by the work conducted on the Boyle Heights and Harbor Community Plans work programs coupled with supplemental area specific regulations. At that point the plan areas would be remove the CUGU Overlay. Similar to previously updated Community Plans, Arleta-Pacoima and Sun Valley-La Tuna Canyon Community plans would incorporate CUGU regulations in the proposed Development Standards Districts and Use Districts. The proposed zones will include use limitations for noxious uses and landscaping requirements. The expectation is to initiate these plans once current work on community plans in the South Valley have concluded and staff resources can be redeployed approximately 2027 or soon thereafter.

Department of Building and Safety

After implementation of additional CUGU zones, no changes would be required to the building plan check process, although plan check tools needed to identify CUGU related sites would need to be updated and enhanced.

Los Angeles Sanitation and Environment: Integration of Environmental Justice into LASAN Operations

- ***Compliance Efforts: CUGU Canvassing by Industrial Waste Management at LASAN***

The Industrial Waste Management Division (IWMD) in LASAN continues to enhance its relationship with industry and deliver an effective program for source control of pollutants, promoting Environmental Compliance & Science while incorporating EJ considerations in underserved communities. IWMD has developed the CUGU Canvassing Inspection Form to systematically inspect businesses within CUGU areas and ensure compliance with environmental regulations. This initiative aims to reduce pollution burdens in environmentally vulnerable communities by identifying businesses that may be operating without proper permits or engaging in practices that contribute to air, water, and land pollution. The checklist includes a thorough evaluation of wastewater discharge, hazardous materials storage, stormwater management, air pollution sources, and solid waste disposal practices. Inspectors document potential violations, issue Notices of Violation (NOVs) when necessary, and provide businesses with resources on Best Management Practices and compliance incentives to encourage pollution prevention. Additionally, referrals are made to appropriate agencies for further investigation of EJ concerns. This proactive approach ensures that businesses in CUGU areas adhere to environmental regulations, thereby improving public health and fostering a cleaner, more sustainable urban environment.

In fiscal year 2023-2024, IWMD completed a total of 229 CUGU canvassing inspections in CUGU Zones reviewing all aspects of these businesses and providing referrals to external agencies if needed. As part of these initiatives, LASAN's Environmental Compliance Inspectors (ECIs) have received specialized training from the South Coast Air Quality Management District (SCAQMD) to identify potential air quality violations at LA businesses during their routine inspections. Through this partnership, ECIs can refer suspected violations to SCAQMD for further investigation and enforcement, helping to address environmental pollution that may fall outside the jurisdiction of a single agency. Although the program has paused, the collaboration demonstrated the value of regional partnerships in addressing multiple cross jurisdictional environmental issues in historically overburdened communities.

IWMD also performed an additional 243 regular canvassing inspections for unpermitted facilities in CUGU Zones. These two types of inspections combine to a total of 472 LASAN inspections of businesses in CUGU Zones. In addition to the 472 business inspections performed in CUGU Zones, IWMD also conducted 1,548 inspections across permitted facilities in EJ areas.

- ***EJ Training for LASAN Staff***

LASAN is committed to ensuring that all employees, both new and current, receive comprehensive training on EJ to enhance their understanding of how the work LASAN performs impacts communities, particularly in disadvantaged areas. In the last two years,

we have delivered five EJ training sessions to both internal staff and new student employees. As part of the LASAN Beyond Onboarding Program, all new LASAN employees are introduced to EJ principles, while existing staff participate in ongoing workshops and receive updated training materials to reinforce learning. Looking ahead, interactive elements, such as field visits and community-lead EJ tours, are being considered, based on available budgets, to offer employees firsthand insight into the environmental challenges faced by disadvantaged communities.

- ***Green Talks Showcase***

Launched during Earth Month in April 2025, the Green Talks Showcase is a sustainability education series created by DCP and LASAN to serve Disadvantaged Communities (DACs). In response to CBO interest, Promesa Boyle Heights agreed to host four sessions on Composting, Zero Waste, Stormwater Reuse through Rain Barrels, and Tree Care. The South Bay Center for Counseling has also requested a Composting Workshop at their Wilmington community garden. These workshops empower residents with practical tools to reduce waste, conserve water, and care for their local environment. Due to budget constraints and community safety concerns, the program was placed on pause effective June 2025.

**Department of City Planning: Case Study: CUGU Review and Environmental Justice
ZI-2355 Review**

● **Addresses:**

- 8827 Bradley (Scope of work: Use of land - building material salvage yard use of land) Permit# 25020-20000-00324
- 8810 Bradley (Scope of work: Use of land - building material salvage yard use of land) Permit# 25020-20000-00346 Supplemental Permit# 25020-20001-00346

These projects consist of using the land for a salvage yard for construction debris, these materials include: concrete, wood, drywall, metal, tile, masonry, and wiring. Both of these projects were done with the applicant Status Plan Design. DCP's Development Services Center (DSC) staff spoke with the project planners for the area - Sun Valley - La Tuna Canyon regarding ZI-2355.

DCP staff confirmed that the salvage yard is allowed as a by-right use in the zone and does not trigger a discretionary entitlement process. DCP conducted an administrative review of the project to ensure compliance with the CUGU Ordinance regulations. ZI-2355, the Environmental Justice Improvement Area, provides instructions for staff to notify Council Offices 2, 6 and land use entitlement applications in their respective jurisdictions. Given that the project was a by-right use in the zone, no CEQA-required mitigation measures could be imposed.

ZI-2458 (Zoning Information for Clean Up Green Up) states that if a use listed in the ordinance under section 13.18.E.2(d) is listed it is then considered a subject use. The scope of work for both these permits is considered a subject use and can be found on the list within the ordinance. The CUGU form that was used for this specific review was CUGU- SUBJECT USES CP-13-7829 this project was not adjacent to any habitable spaces but was listed as a subject use on the ordinance. On this form DCPs' review consists of making sure the development regulations for the subject use are in compliance with CUGU. The review consists of the development regulations being in compliance with CUGU. DCP also charges a fee of \$408.44. Once the fee is paid, DCP requires the form to be displayed on a page of the plans and DCP is then able to clear the permit. Trash receptacles are illustrated on the plans and are gated and covered through enclosures at least six feet in height. The CUGU checklist is also placed on a page on the plans to show that the project is adhering to the CUGU ordinance and shows compliance.

The current status on these permits is that they have been cleared for the properties 8810 Bradley and 8827 Bradley Ave. DCP DSC staff reviewed the CUGU ordinance, the form, the plans, and permits. The site planning and lighting was displayed on the site plan and details page. The site plan displays the layout of the proposed building material salvage yard, where there will be outdoor lighting to be directed away and or shielded from residential uses in accordance with the non-residential light pollution reduction standards.

DCP also utilized two other CUGU forms to determine what the review will consist of. The second form is CUGU - Subject Uses Adjacent to Publicly Habitable Space CP13-7830 this form is used when the primary use of a site is a subject use on the ordinance and is next to a habitable space, which would include any use containing one or more dwelling unit(s) or guest room - can also be considered a park, recreation center, day care, medical building, or nursing home. The third form is CUGU-Publicly Habitable Space Adjacent to Subject Uses CP13-7831 this form is used when the project is a publicly habitable space and it is adjacent to a subject use listed in the ordinance.

Los Angeles Sanitation and Environment: Actions in CUGU Zones

LASAN has implemented a range of inspections, enforcement actions, infrastructure projects, brownfield cleanups, illegal dumping cleanups, and programmatic initiatives since the adoption of the CUGU Ordinance in 2016. These efforts are described below.

- ***Thousands of compliance inspections and environmental audits conducted in CUGU zones.***
 - **Industrial Waste Management Compliance Efforts** - Please refer to **Appendix A** for more information on this effort.
- ***Infrastructure projects addressing stormwater, green streets, and greening projects located directly in Sun Valley, Pacoima, Wilmington, and Boyle Heights.***
 - **Safe Clean Water Program**
One of the key goals of the Safe Clean Water Program is to provide a variety of water quality, water supply, and community investment benefits to disadvantaged communities and environmental justice areas. The Safe Clean Water Program projects pursue reductions in stormwater runoff pollution and augmentations in local water supply that are achieved alongside improved flood management, increased green spaces and habitats, enhanced recreational opportunities, improved air quality, and reduced urban heat island impacts. The Safe Clean Water Implementation Division (SCWID) of LASAN is currently implementing six projects within CUGU areas and 12 projects within areas with a CalEnviroScreen 4.0 score greater than 85%. The Safe Clean Water Division also maintains and administers historical water quality projects, the majority of which were funded by Proposition O. For calendar year 2024, the Watershed Protection Division conducted a total of 637 citations in EJ areas. The 637 citations occurred in areas with a CalEnviroScreen score greater than 85%, and 202 of those citations took place in Clean Up Green Up Areas (Boyle Heights, Pacoima/Sun Valley, Wilmington). In total, 40 water quality improvement projects have been delivered or are underway in environmental justice communities across Los Angeles. These projects offer strong environmental, health, and equity benefits — reducing exposure to carcinogens, enhancing access to parks and green spaces, and demonstrating substantial reinvestment of public funds into disadvantaged communities. This should position LASAN's work favorably for public and leadership support.
 - **Tree Planting**
The Tree Planting Program focuses on greening the parts of Los Angeles with the least tree canopy and most disadvantaged communities, supporting Justice40 initiatives. In 2024, LASAN planted 1,239 street trees, sequestered 3,364.59 metric tons of CO₂, removed 22,029 square feet of concrete for new tree wells, and maintained 2,657 trees. LASAN invested \$1,831,688 in communities with high socioeconomic and environmental burdens. Collaborating

with community partners, non-profits, and City Departments, we target barren areas around schools, transit corridors, and small businesses.

Program Highlight - [Seeing more trees in Boyle Heights lately? Here's why](#)

- ***Environmental assessments and brownfield remediation projects that support land reuse and affordable housing opportunities in historically overburdened communities.***

- **Citywide Brownfields Program, including the impact of the Exide Battery Plant on LA Communities**

LASAN's Citywide Brownfields Program (Brownfields Program) continues to offer technical and financial assistance to address challenges related to brownfields, particularly in underserved communities. In 2024, the Brownfields Program made significant progress in revitalizing contaminated sites by implementing brownfield grants funded by the United States Environmental Protection Agency (USEPA) and California EPA (CalEPA). This year, LASAN completed nine environmental assessments at various future redevelopment sites and currently have five remediation projects underway. Since 2012, the LASAN Brownfields Team has conducted 29 environmental assessments and remediated three Brownfields in CUGU Zones. To further support these efforts, LASAN applied for a \$2 million USEPA Cleanup Grant and a \$500,000 USEPA Community-Wide Assessment Grant, with funding announcements pending. These initiatives help transform brownfields into affordable housing projects, mixed-use developments with residential components, open spaces, and parks, fostering sustainable and equitable redevelopment.

The Brownfields Program Staff also attend CA Department of Toxic Substances Control (DTSC) meetings in regards to the Exide Battery Plant to monitor the ongoing cleanup efforts. While the plant is not located in a CUGU Zone, the impacted communities include Boyle Heights. As of April 2, 2025, significant progress has been made, with 1,585 parcels cleaned up within the City of Los Angeles. A dedicated team of 20 crews is executing a street-by-street approach to residential cleanup. The parkways cleanup, initiated under an April 2024 contract, has completed 42 sub-blocks in the City of LA. At the Exide facility itself, 9 structures have been demolished, with each surrounded by full enclosure units during demolition for safety. Concurrently, efforts to close the Title 5 permit (estimated April 2025) are advancing, which will formally designate the site as safe and stable—though public access remains prohibited. On the regulatory front, collaboration with the EPA continues to work on a Superfund listing for the project. The DTSC team is currently addressing EPA comments, and a forthcoming technical document will establish the link between Exide and groundwater contamination.

- ***Ongoing illegal dumping abatement, hazardous waste removal, and solid waste management in CUGU neighborhoods.***
 - **Illegal Dumping Waste Cleanups**
LASAN actively tackles illegal dumping citywide, including in CUGU and EJ areas, through consistent cleanups and enforcement efforts. In 2024, cleanup efforts resulted in the removal of 17,680 tons of illegally dumped waste, including 7,890 tons of solid waste and 234 tons of hazardous waste. This substantial cleanup effort contributes to a cleaner, healthier environment, particularly in historically burdened communities, reinforcing the commitment by LASAN to EJ and public health.
 - **Reusable Foodware and Greening Businesses**
The new LASAN Reusable Foodware Program focuses on CUGU areas to combat single-use plastic waste by promoting the use of durable, reusable foodware. This initiative supports local businesses and residents in these communities to transition to sustainable alternatives, thereby reducing the environmental footprint of disposable items. In its initial phase, the program successfully converted 120 businesses to utilize reusable foodware in their business practices. Through comprehensive education, resources, and incentives, LASAN fostered a community-wide shift towards reuse and away from disposal. These measures have fostered a cleaner and healthier Los Angeles; by adopting reusable foodware, we not only reduce waste, but also safeguard our environment for future generations.
- ***Interagency Enforcement Collaboration addressing air quality, hazardous materials, and cross-jurisdictional compliance matters.***
 - LASAN actively collaborates with DCP, LADBS, and other City agencies to share environmental compliance data, support land use decisions, and ensure that environmental health and environmental justice considerations are incorporated into ongoing community planning processes.
 - This intricate cross-jurisdictional collaboration, initiated through Council instructions detailed in CF 19-0454 and brought to fruition by the CUGU Ombudsperson's profound understanding of municipal operations and inter-agency relationships, exemplifies the "No Truck Idling" signage and enforcement endeavors, executed in concert with Council District 15, LAPD, LADOT, SCAQMD, the California Air Resources Board (CARB), and California for Safe Schools.

Department of Building and Safety: CUGU Cases

- *The DCP Clearance Status covering Permit Submittal Year from 2016 to 2025 includes a total of:*
 - **555 Approved, Approved with Conditions**
 - **454 Pending**
 - **1,527 Exempt, Not Applicable, Not Required**
 - **2 Denied**

There were a total of 1,594 Building Permits Issued with CUGU Clearance from 2016 to 2025. For more details on these Permits, please see below.

The table below is a summary of CUGU related clearances by year based on the permit application submittal date for reference.

Permit Submittal Year	DCP Clearance Status			
	Approved, Approved with Conditions	Pending	Exempt, Not Applicable, Not Required	Denied
2016*	29	20	80	1
2017	49	42	122	0
2018	70	34	112	0
2019	74	30	136	0
2020	66	54	140	0
2021	66	44	177	0
2022	51	47	250	0
2023	64	42	194	0
2024	43	75	211	0
2025	43	66	106	1
Totals	555	454	1,527	2

*CUGU Ordinance implementation became effective June 4, 2016.

The table below is a summary of building permits issued based on the permit application submittal date with CUGU clearance for reference.

Permit Submittal Year	Building Permits Issued with CUGU Clearance
2016*	102
2017	146
2018	155
2019	163
2020	161
2021	185
2022	231
2023	199
2024	179
2025	73
Total	1,594

*CUGU Ordinance implementation became effective June 4, 2016.

Los Angeles Sanitation Department Recommendations for Legislative and Procedural Changes

The primary recommendation from LASAN is to leverage the lessons learned from the CUGU framework with the goal of embedding EJ into the operations of all City Departments. This following items could be considered in the review:

- ***EJ Training for all City Personnel:*** provide a video or designate personnel to train staff on how to implement EJ into their daily work. These efforts should emphasize prioritizing underserved communities with valuable City resources.
- ***Environmental Justice Dashboard:*** update LASAN's existing EJ Dashboard to become a citywide platform, serving as a public-facing GIS tool to track and display environmental conditions, compliance activities, and project implementation across EJ areas. The dashboard will enhance public transparency, support data-driven decision making, and empower community members to stay informed. Dedicated GIS staffing will be needed to ensure the dashboard remains current and fully operational.
- ***Business Compliance:*** conduct a comprehensive review of existing City regulations to address business activities that potentially contribute to community pollution, propose expansion of City processes, establish mandatory and voluntary mitigation measures for business, and explore business incentives for mitigation measures. This effort might include new ordinances and identification of new funding sources.
- ***Community Engagement:*** support existing community outreach efforts and create a citywide policy for inclusive, meaningful stakeholder engagement that amplifies the voices of frontline communities, integrates continuous feedback, and provides financial support for community expertise.

In order to advance these efforts, the Office of the City Administrator and Office of the Chief Legislative Analyst must work to identify funding sources. LASAN recommends adding new dedicated positions, including a regularized Environmental Affairs Officer and an Environmental Specialist III. The CUGU resolution authority Environmental Affairs Officer Ombudsperson position was eliminated from the FY '26 budget, pausing further progress on CUGU and EJ programs at LASAN. These positions will strengthen LASAN program management, facilitate interagency coordination, and improve community engagement efforts.