

PLANNING DEPARTMENT TRANSMITTAL TO THE CITY CLERK'S OFFICE

CITY PLANNING CASE:	ENVIRONMENTAL CASE:	COUNCIL DISTRICT:	
CPC-2025-1648-CA	ENV-2025-1649-SE	All - Citywide	
RELATED CASE NOS:	COUNCIL FILE NO:	PROCEDURAL REGULATIONS:	
CPC-2019-1881-CA, ENV-2019-1882-SE, CPC-2016-11-CA, CPC-2016-12-CA	CF 24-1587	<input type="checkbox"/> Ch. 1 as of 1/21/24 (Not subject to Processes & Procedures Ord.) <input checked="" type="checkbox"/> Ch. 1A (Subject to Processes & Procedures Ord.)	
PROJECT ADDRESS / LOCATION:			
N/A – Citywide Code Amendment			
PLANNER CONTACT:	TELEPHONE NUMBER:	EMAIL ADDRESS:	
Julia Heidelman	818-374-5045	julia.heidelman@lacity.org	
ITEMS FOR CITY COUNCIL CONSIDERATION (IE. ENTITLEMENTS, LEGISLATIVE ACTIONS):			
<ul style="list-style-type: none"> - Environmental Clearance (SE) - Code Amendment (CA) <input checked="" type="checkbox"/> <i>The preparation of a draft ordinance by the City Attorney will be required.</i>			
FINAL ENTITLEMENTS NOT ADVANCING FOR CITY COUNCIL CONSIDERATION: (UNAPPEALED OR NON-APPEALABLE ITEMS)			
<input checked="" type="checkbox"/> N/A			
ITEMS APPEALED:			
<input checked="" type="checkbox"/> N/A			
ATTACHMENTS:	REVISED:	ENVIRONMENTAL DOCUMENT:	REVISED:
<input checked="" type="checkbox"/> Letter of Determination <input checked="" type="checkbox"/> Findings of Fact <input checked="" type="checkbox"/> Staff Recommendation Report <input type="checkbox"/> Conditions of Approval <input type="checkbox"/> T Conditions <input checked="" type="checkbox"/> Proposed Ordinance <input type="checkbox"/> Zone Change Map and Ordinance <input type="checkbox"/> GPA Resolution	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> Categorical Exemption (CE) (Notice of Exemption) <input type="checkbox"/> Statutory Exemption (SE) (Notice of Exemption) <input type="checkbox"/> Negative Declaration (ND) <input type="checkbox"/> Mitigated Negative Declaration (MND) <input type="checkbox"/> Environmental Impact Report (EIR) <input type="checkbox"/> Mitigation Monitoring Program (MMP) <input type="checkbox"/> Sustainable Communities Project Exemption (SCPE)	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

<input type="checkbox"/> Land Use Map <input type="checkbox"/> Exhibit A – Plans <input checked="" type="checkbox"/> Mailing List <input checked="" type="checkbox"/> Interested Parties List <input type="checkbox"/> Appeal <input type="checkbox"/> Development Agreement <input type="checkbox"/> Site Photographs <input checked="" type="checkbox"/> Other: See of list of Exhibits in “Notes/Instructions” section	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> Sustainable Communities Environmental Assessment (SCEA) <input type="checkbox"/> Sustainable Communities Environmental Impact Report (SCEIR) <input type="checkbox"/> Appendices <input type="checkbox"/> Other:	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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NOTES / INSTRUCTIONS:

The proposed Emergency Shelter Code Amendment is transmitted for City Council’s Consideration to CF 24-1587.

This is a transmittal of the City Planning Commission’s decision and supporting documents related to the proposed Emergency Shelter Code Amendment (CPC-2025-1648-CA).

Only the following Attachments and Staff Report Exhibits should be transmitted for this case number (CPC-2025-1648-CA) and new council file as follows. When uploading, please name the files as follows:

- Staff Report from Department of City Planning
- Findings
- Exhibit A.1 Chapter 1 Emergency Shelter Code Amendment
- Exhibit A.2 Chapter 1A Emergency Shelter Code Amendment
- Exhibit B Correspondence

CITY COUNCIL NOTICE TIMING:	NOTICE LIST (SELECT ALL):	NOTICE PUBLICATION:
<input type="checkbox"/> 10 days <input type="checkbox"/> 15 days <input type="checkbox"/> 24 days <input checked="" type="checkbox"/> N/A - None <input type="checkbox"/> Other:	<input type="checkbox"/> Owner <input type="checkbox"/> Applicant <input type="checkbox"/> Adjacent / Abutting <input type="checkbox"/> 100’ radius <input type="checkbox"/> 300’ radius <input type="checkbox"/> 500’ radius <input type="checkbox"/> Neighborhood Council <input checked="" type="checkbox"/> Interested Parties <input type="checkbox"/> Other:	<input type="checkbox"/> 10 days <input type="checkbox"/> 15 days <input type="checkbox"/> 24 days <input checked="" type="checkbox"/> N/A - None <input type="checkbox"/> Other:

FISCAL IMPACT STATEMENT:

☐ Yes
☒ No

*If determination states administrative costs are recovered through fees, indicate “Yes.”

PLANNING COMMISSION:

<input checked="" type="checkbox"/> City Planning Commission (CPC) <input type="checkbox"/> Cultural Heritage Commission (CHC) <input type="checkbox"/> Central Area Planning Commission <input type="checkbox"/> East LA Area Planning Commission <input type="checkbox"/> Harbor Area Planning Commission	<input type="checkbox"/> North Valley Area Planning Commission <input type="checkbox"/> South LA Area Planning Commission <input type="checkbox"/> South Valley Area Planning Commission <input type="checkbox"/> West LA Area Planning Commission
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PLANNING COMMISSION HEARING DATE:	COMMISSION VOTE:
April 24, 2025	8 – 0
LAST DAY TO APPEAL:	DATE APPEALED:
N/A	N/A
COUNCIL TIME TO ACT:	TIME TO ACT START:
<input type="checkbox"/> 30 days <input type="checkbox"/> 45 days <input type="checkbox"/> 60 days <input type="checkbox"/> 75 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> N/A - None <input type="checkbox"/> Other:	<input type="checkbox"/> Appeal Filing Date <input checked="" type="checkbox"/> Received by Clerk <input type="checkbox"/> Last Day to Appeal <input type="checkbox"/> N/A / None <input type="checkbox"/> Other:
TRANSMITTED BY:	TRANSMITTAL DATE:
Cecilia Lamas Commission Executive Assistant II	May 15, 2025



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: MAY 15, 2025

Case No.: CPC-2025-1648-CA

CEQA: ENV-2025-1649-SE

Plan Area: Citywide

Council District: All

Project Site: Citywide

Applicant: City of Los Angeles

At its meeting of **April 24, 2025**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following Code Amendment:

An ordinance amending Chapter 1 Sections 12.80 and 12.81 and Chapter 1A Sections 1.6.2 and 1.6.3, and other related sections, of the Los Angeles Municipal Code (LAMC) to make technical amendments to align with emergency shelter provisions codified in State law (Government Code Section 8698 et. seq) under a declared local shelter crisis.

1. **Determined** the Proposed Code Amendment is not a “project” pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15378(b) and the project is exempt from CEQA under California Public Resources Code Section 21080(b)(4) and Government Code Section 8698.4(a)(4);
2. **Approved and recommended** that the City Council **adopt** the proposed ordinance to amend the Chapter 1 Sections 12.80 and 12.81 and Chapter 1A Sections 1.6.2 and 1.6.3 of the Los Angeles Municipal Code (LAMC) and any related Code sections of Chapter 1 and Chapter 1A;
3. **Adopted** the Staff Recommendation Report as the Commission’s report on the subject; and
4. **Adopted** the attached Findings.

The vote proceeded as follows:

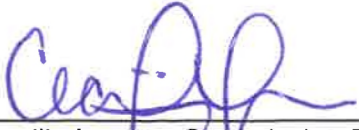
Moved: Newhouse

Second: Cabildo

Ayes: Choe, Klein, Lawshe, Mack, Saitman, Zamora

Absent: Diaz

Vote: 8 – 0



Cecilia Lamas, Commission Executive Assistant II
Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is final and not appealable.

Notice: If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Proposed Ordinance (Chapter 1 – Emergency Shelter Code Amendment),
Proposed Ordinance (Chapter 1A – Emergency Shelter Code Amendment),
Findings

cc: Arthi Varma, Deputy Director
Jenna Monterrosa, Principal City Planner
Matthew Glesne, Senior City Planner
Julia HeideIman, City Planner
Peter Monti, Planning Assistant

EXHIBIT A.1:
Chapter 1 Emergency Shelter Code Amendment

CPC-2025-1648-CA

As recommended by the City Planning Commission

May 6, 2025

ORDINANCE NO. _____

An ordinance amending Section 12.80 and 12.81 of Chapter I of the Los Angeles Municipal Code to incorporate the definition of “homeless shelter” as defined in state law.

**THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:**

Sec. 1. Section 12.80 of Chapter I of the Los Angeles Municipal Code is amended to read as follows:

SEC. 12.80. HOMELESS SHELTERS – EMERGENCIES – CITY OWNED AND LEASED PROPERTY.

Notwithstanding any provisions of this article to the contrary, during any period for which the Mayor and/or the City Council have declared a shelter crisis within the meaning of Government Code Sections 8698, et seq., a homeless shelter ~~for the homeless~~ (as defined in Government Code Section 8698.4(c)(1)~~12.03 of this Code~~) may be established and operated on property owned or leased by the City of Los Angeles in any zone as a matter of right without regard to the number of beds or number of persons served. Facilities used as a shelter for the homeless under this section must comply with the minimum building regulations set forth in Section 91.8605 of this Code, as it is currently written or as it may be amended in the future. If the lot on which any such shelter is located does not have sufficient area to provide the number of parking spaces required by Section 12.21 A.4.(w) of this Code, then the number of spaces required shall be the number for which adequate area exists. If insufficient area for any parking spaces exists on the lot, no spaces shall be required.

Sec. 2. Subsection A of Section 12.81 of Chapter I of the Los Angeles Municipal Code is amended to read as follows:

SEC. 12.81. HOMELESS SHELTERS - EMERGENCIES - CHARITABLE ORGANIZATIONS.

A. Notwithstanding any provisions of this article to the contrary, during any period for which the Mayor and/or the City Council have declared a shelter crisis within the meaning of Government Code Sections 8698 et seq., a homeless shelter ~~for the homeless~~ (as defined in Government Code Section 8698.4(c)(1)~~Section 12.03 of this Code~~) may be established and operated in the R3, RAS3, R4, RAS4, R5, C2, C4, C5, CM, M1, M2, and M3 zones without regard to the number of beds or number of persons served, if the shelter is operated by a religious institution or a non-profit, charitable

organization and the shelter is located on property owned or leased by that institution or organization. If the lot on which any such shelter is located does not have sufficient area to provide the number of parking spaces required by Section 12.21 A.4.(w) of this Code, then the number of spaces required shall be the number for which adequate area exists. If insufficient area for any parking spaces exists on the lot, no spaces shall be required. Unreinforced masonry and/or non-ductile concrete buildings shall not be used as shelters for the homeless.

Sec. 3. Retroactive Application. The provisions of this ordinance shall apply retroactively to every homeless shelter established during any period for which the Mayor or the City Council have declared a shelter crisis within the meaning of California Government Code section 8698, et. seq, or subject to the provisions of Sections 12.80 or 12.81 of Chapter I of this Code.

EXHIBIT A.2:
Chapter 1A Emergency Code Amendment

CPC-2025-1648-CA

As recommended by the City Planning Commission

May 6, 2025

ORDINANCE NO. _____

An ordinance amending Sections 1.6.2 and 1.6.3 and Division 14.3 of Chapter 1A of the Los Angeles Municipal Code to incorporate the definition of “homeless shelter” as defined in state law.

**THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:**

Sec. 1. Section 1.6.2. of Chapter 1A of the Los Angeles Municipal Code is amended to read as follows:

SEC. 1.6.2. EMERGENCY HOMELESS SHELTERS — CITY OWNED & LEASED PROPERTY

1. Regardless of any provisions of this Zoning Code (Chapter 1A) to the contrary, during any period for which the *Mayor* or the *City Council* have declared a shelter crisis within the meaning of California Government Code, Sec. 8698. (Shelter Crisis), et seq., a ~~transitional shelter~~ homeless shelter may be established and operated on property owned or leased by the City of Los Angeles in any zone as a matter of right regardless of the number of beds or number of persons served.
2. Facilities used as a ~~transitional shelter~~ homeless shelter under this Section (Emergency Homeless Shelters — City Owned & Leased Property) shall comply with the minimum building regulations set forth in Chapter IX. (Building Regulations), Sec. 91.8605. (Emergency Homeless Shelters) of this Code, as it is currently written or as it may be amended in the future, and are exempt from the requirements of the *zoning districts*.
3. If the *lot* on which any such shelter is located does not have sufficient area to provide the number of *parking stalls* required by Sec. 4C.4.1. (Automobile Parking Stalls), then the number of ~~spaces~~ parking stalls required shall be the number for which adequate area exists. If insufficient area for any *parking stalls* exists on the *lot*, no spaces shall be required.

Sec. 2. Section 1.6.3. of Chapter 1A of the Los Angeles Municipal Code is amended to read as follows:

SEC. 1.6.3. EMERGENCY HOMELESS SHELTERS— CHARITABLE ORGANIZATIONS

1. Regardless of any provisions of this Zoning Code (Chapter 1A) to the contrary, during any period for which the *Mayor* or the *City Council* have declared a shelter crisis within the meaning of California Government Code, Sec. 8698. (Shelter Crisis), et seq., a ~~transitional-shelter~~homeless shelter may be established and operated on a *lot* zoned with a Residential Use District (Div. 5B.3.) with a Density District (Part 6B.) of FA to 8, Residential-Mixed Use District (Div. 5B.4.) with a Density District (Part 6B.) of FA to 8, Commercial-Mixed Use District (Div. 5B.5.), Industrial-Mixed Use District (Div. 5B.6.), or Industrial Use District (Div. 5B.7.) regardless of the number of beds or number of persons served, or any applicable Form District (Part 2B.) or Frontage District (Part 3B.) standards, if the ~~transitional~~homeless shelter is operated by a *religious institution* or a non-profit charitable organization and the ~~transitional-shelter~~homeless shelter is located on property owned or leased by that institution or organization.
2. Facilities used as a ~~transitional-shelter~~homeless shelter under this Section (Emergency Homeless Shelters — Charitable Organizations) shall comply with the minimum building regulations set forth in Chapter IX. (Building Regulations), Sec. 91.8605. (Emergency Homeless Shelters), as it is currently written or as it may be amended in the future, and are exempt from the requirements of the *zoning districts*.
3. If the *lot* on which any such ~~transitional-shelter~~homeless shelter is located does not have sufficient area to provide the number of *parking stalls* required by Sec. 4C.4.1. (Automobile Parking Stalls), then the number of ~~spaces~~parking stalls required shall be the number for which adequate area exists. If insufficient area for any *parking stalls* exists on the *lot*, no ~~spaces~~parking stalls shall be required.
4. Unreinforced masonry or non-ductile concrete buildings shall not be used as ~~shelters for the homeless~~a homeless shelter
5. Any provider establishing and operating a ~~transitional-shelter~~homeless shelter shall also comply with the following requirements:
 1. Providers shall register with the City of Los Angeles by submitting a Cold/Wet Weather Temporary Shelter Application online via the City's website (www.lacity.gov); and
 2. Providers shall comply with the Cold/Wet Weather Temporary Shelter requirements promulgated by the Los Angeles Fire Department's Fire Prevention and Public Safety Bureau;

3. Providers shall provide written notification to the owners of properties *abutting* the subject property, as well as to any *school* located within 500 feet of the subject property, prior to operating a ~~transitional~~homeless shelter on the subject property; and
4. Providers shall comply with all local, state, and federal requirements that apply to the permitted use of their property while operating a ~~transitional~~homeless shelter pursuant to this Section (*Emergency Homeless Shelters — Charitable Organizations*).

Sec. 3. The following definition is added in alphabetical order to Division 14.3. of Article 14. of Chapter 1A of the Los Angeles Municipal Code to read as follows:

Homeless Shelter: For the purposes of Sec. 1.6.2. (Emergency Homeless Shelters — City Owned & Leased Property) and Sec. 1.6.3. (Emergency Homeless Shelters — Charitable Organizations), homeless shelter is defined pursuant to California Government Code, Chapter 7.8. (Shelter Crisis), Sec. 8698.4(c)(1).

Sec. 4. Retroactive Application. The provisions of this ordinance shall apply retroactively to every homeless shelter established during any period for which the Mayor or the City Council have declared a shelter crisis within the meaning of California Government Code section 8698, et. seq, or subject to the provisions of Sections 1.6.2. (Emergency Homeless Shelters — City Owned & Leased Property) or Section. 1.6.3. (Emergency Homeless Shelters — Charitable Organizations) of Chapter 1A of this Code.

FINDINGS

Program Findings and Discussion

A.	City	Charter	Findings
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City Charter Section 556, 558 and LAMC Section 13B.1.3 - Charter Sections 556 and 558 and LAMC Sec. 13B.1.3 require the City Planning Commission and the City Council to adopt the following findings when taking any action to amend zoning or other land use regulations concerning permissible uses, height, density, bulk, location or use of buildings or structures, size of yards, open space, setbacks, building line requirements, and other similar requirements (collectively zoning ordinances):

(1) The zoning ordinance is in substantial conformance with the purposes, intent, and provisions of the General Plan.

(2) The zoning ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice.

(3) Other findings required by law.

Pursuant to City Charter Section 556 and 558, and LAMC Sec. 13B.1.3, the proposed Emergency Shelter Code Amendment as part of the 2021 - 2029 Housing Element Program 115 (Zoning and Development Standards for Homeless Housing) are in substantial conformance with the purpose, intent and provisions of the General Plan. The code amendment is also in conformance with the public necessity, convenience, general welfare and good zoning practice and other laws. In particular, they respond to the City's declared shelter crisis, which is meant to facilitate the provision of emergency shelters for persons experiencing homelessness in a timely manner to help alleviate hardship and potential threats to their health and safety that may occur as a result of the shelter crisis.

B. General Plan Findings

The City's General Plan includes an overarching goal of preventing and ending homelessness, as well as a number of related objectives and policies around the provision of short-term emergency housing. Specifically, the proposed ordinance is consistent with, and helps to further accomplish the following goals, objectives and policies of the General Plan as set forth below.

General Plan Framework Element

GOAL 4A – An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.

Objective 4.4 – Reduce regulatory and procedural barriers to increase housing production and capacity in appropriate locations.

Housing Element

GOAL 5 – A City committed to preventing and ending homelessness.

Objective 5.1: Provide an adequate supply of short-term and permanent housing in addition to supportive services throughout the City that are appropriate for and meet the specific needs of all persons who are homeless or at-risk of homelessness.

Policy 5.1.1 - Ensure an adequate supply of emergency and transitional housing for people who are homeless or are at a risk of becoming homeless, including people with disabilities.

Policy 5.1.5 - Expand housing, shelter, and supportive services for the homeless and special needs populations in all communities, and reduce zoning and other regulatory barriers to their placement and operation

The proposed ordinance meets the intent and purposes of the General Plan in that it supports the by-right operation and placement of shelters for the homeless when a shelter crisis is declared. The proposed ordinance will provide greater alignment between local zoning code regulations for emergency shelters, and the applicable provisions of State Law, thereby providing for greater certainty for providers who partner with the City to open and operate emergency shelters. By aligning procedures with state law, the proposed ordinance will help ensure that an adequate supply of emergency and short-term housing can be established for people who are homeless or at risk of experiencing homelessness.

The ordinance also supports the implementation of Program 115 in the Housing Element (Zoning and Development Standards for Homeless Housing) in that it facilitates by-right siting of shelter and transitional housing facilities, as described in the Program 115 objective.

Summary of CEQA Findings

Pursuant to California Government Code Section 8698.4(a)(4), Section 21080(b)(4) of the Public Resources Code and California Environmental Quality Act (CEQA) Guidelines Sections 15378(b), the adoption of the proposed ordinance amending LAMC Ch. 1 Sec. 12.80 and 12.81 and Ch. 1A Sec. 1.6.2 and 1.6.3, and other related sections are exempt from CEQA.

Government Code Section 8698.4(a)(4)

Section 8698.4(a)(4) provides that actions by a local agency, such as the City, that will facilitate the lease, conveyance, or encumbrance of land owned by the City for a homeless shelter constructed or allowed by CA Gov. Code § 8698.4 are statutorily exempt from the requirements of CEQA. The proposed ordinance does precisely that, thus, is exempt from the requirements of CEQA.

CEQA Guidelines Section 15378(b)

Adoption of the proposed ordinance is exempt from CEQA pursuant to CEQA Guidelines Section 15378(b) because it can be seen with certainty that there is no possibility that the project may have a significant effect on the environment.

CEQA Guidelines Section 15378(a) provides that a project under CEQA is one that “has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” Section 15378(b) provides that administrative and organizational activities that will not result in direct or indirect physical changes in the environment are not projects for purposes of CEQA.

The proposed ordinance does not involve any activities that will directly or indirectly alter the environment from its current conditions. The proposed amendments to LAMC Ch. 1 Sec. 12.80 and 12.81 and Ch. 1A Sec. 1.6.2 and 1.6.3 are administrative and organizational in nature, and will ensure that local regulations align with the applicable provisions of State law. There is no potential that the proposed ordinance will result in the creation of additional emergency shelters, as it does not make any changes to existing allowances for emergency shelters. The anticipated result of the proposed ordinance is that temporary emergency shelters will continue to be able to be established, and would not result in any direct or indirect impact to the environment. The provisions will continue to only apply during a declared shelter crisis emergency pursuant to state law (CA Gov. Code Sec. 8698 et. seq). A shelter crisis may be revoked by the Mayor or City Council at any time.

PRC Section 21080(b)(4) (Emergency Projects)

Additionally, approval of the project is exempt from CEQA pursuant to Public Resources Code Section 21080(b)(4), which provides that emergency projects are exempt from the requirements of CEQA. In particular, this exemption provides that specific actions necessary to prevent or mitigate an emergency are exempt from CEQA.

While it is clear that the proposed ordinance will not have any significant effect on the environment, even in the unlikely and unforeseeable event that they did, any impacts that could occur from the existing and continuing regulations would occur during times of extreme need for housing, upon declaration of a shelter crisis emergency pursuant to CA Gov. Code Sec. 8698 et seq. Any potential impacts from the proposed amendments to LAMC Ch. 1 Sec. 12.80 and 12.81 and Ch. 1A Sec. 1.6.2 and 1.6.3, and other related sections would therefore be temporary in nature and necessary to mitigate an emergency shelter crisis in the City of Los Angeles.

Therefore, on the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that the adoption of the proposed ordinance is exempt from CEQA. The analysis reflects the lead agency’s independent judgment and analysis. The records upon which this decision is based are with the Planning Department in Room 750, 200 North Spring Street in Los Angeles, California