

FINDINGS

Charter Findings

Charter Section 555 provides that the City Council may amend the General Plan in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic, or physical identity. No legislative findings are required to amend the General Plan. The Proposed Plan includes administrative amendments to the Safety Element of the General Plan. All the amendments to the Safety Element of the City's General Plan apply citywide.

General Plan Findings

For all the reasons provided below, the Safety Element amendment contains goals, objectives, policies, and programs that are consistent with the General Plan.

Safety Element Goal 1: Disaster Prevention

Zoning, Infrastructure and Mitigations in Hazard Areas

The amended Safety Element to incorporate the updated LHMP places an emphasis on mitigating disaster impacts by using a variety of tools in hazard areas, including: lower intensity zoning designations (such as open space, low density residential and industrial), building code mitigations, fire code requirements, and infrastructure planning that avoids and hardens infrastructure in hazard areas. This is consistent with several other Elements of the General Plan, including Framework, Open Space, and Housing.

With respect to general disaster prevention the **Framework Element** places a focus on using hazard designations to inform zoning decisions by setting aside hazard areas for low density development and open space.

The General Plan Framework Element states the following:

Policy 6.1.1 *Consider appropriate methodologies to protect significant remaining open spaces for resource protection and mitigation of environmental hazards, such as flooding, in and on the periphery of the City, such as the use of tax incentives for landowners to preserve their lands, development rights exchanges in the local area, participation in land banking, public acquisition, land exchanges, and Williamson Act contracts.*

Policy 6.3.1 *Preserve flood plains, landslide areas, and steep terrain areas as open space, wherever possible, to minimize the risk to public safety.*

Goal 9B *A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.*

Policy 9.5.1 *Develop a stormwater management system that has adequate capacity to protect its citizens and property from flooding which results from a 10-year storm (or a 50-year storm in sump areas).*

Policy 9.6.2 *Establish standards and/or incentives for the use of structural and nonstructural techniques which mitigate flood-hazards and manage stormwater pollution.*

Policy 9.6.3 *The City's watershed-based approach to stormwater management will consider a range of strategies designed to reduce flood hazards and manage*

stormwater pollution. The strategies considered will include, but not necessarily be limited to:

- a. Support regional and City programs which intercept runoff for beneficial uses including groundwater recharge;*
- b. Protect and enhance the environmental quality of natural drainage features;*
- c. Create stormwater detention and/or retention facilities which incorporate multiple uses such as recreation and/or habitat;*
- d. On-site detention/retention and reuse of runoff; e. Mitigate existing flood hazards through structural modifications (floodproofing) or property buy-out;*
- f. Incorporate site design features which enhance the quality of offsite runoff; and*
- g. Use land use authority and redevelopment to free floodways and sumps of inappropriate structures which are threatened by flooding and establish appropriate land uses which benefit or experience minimal damages from flooding.*

Policy 9.16.1 *Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.*

Policy 9.17 *Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.*

Policy 9.25.1 *Continue to actively participate in emergency planning.*

With respect to general disaster prevention, this amendment is consistent with the **Open Space Element** which identifies open space as beneficial to public health and safety and calls for the evaluation of open space designation as a mitigation for natural and manmade hazards to public safety.

The Open Space Element states the following:

Objective O-7 *To identify, preserve and/or conserve those lands necessary as open space land in order to protect the public health and safety.*

Policy 2.2 *Flood endangered areas should be set aside for appropriate open space uses.*

Policy 2.20 *Hazardous open space areas; including property especially subject to fire, steeply sloping hillsides and geologically unstable lands; are threats to the public safety. Proposals for their use should be evaluated in light of more restrictive grading requirements, better provision for access and lower densities and/or intensities of development.*

Policy 3.12 *Lands subject to natural or manmade hazards, detrimental to life and property should be left in their natural state, where feasible, and considered as open space.*

With respect to general disaster prevention, this update is consistent with the **2021-2029 Housing Element**, which works to analyze and plan for disaster-resistant housing and to provide for well informed and prepared residents.

The Housing Element states the following:

Objective 3.3 *Promote disaster and climate resilience in citywide housing efforts.*

Policy 3.3.1 *Identify risks to our housing stock related to disasters and other unplanned events, especially those likely to accelerate as a result of climate change.*

Policy 3.3.2 *Establish plans, incentives, and development standards that eliminate or minimize disaster risk and promote positive health outcomes for communities most at risk.*

Policy 3.3.5 *Identifying funding and other resources to support the retrofitting of existing buildings to improve resilience and health.*

Policy 3.3.6 *Educate homeowners, tenants and landlords about disaster risk and mitigations.*

The Safety Element is consistent with the above policies from the Framework Element, Open Space Element and 2021-2029 Housing Element as they relate to disaster prevention because the Safety Element provides a background on how the city prevents disaster events and minimizes their impact when they do occur. Policies are included to ensure a consideration of disaster prevention while making land use decisions, most commonly by selecting lower zoning designations in Very High Fire Hazard Severity Zones and other designations and mitigations as appropriate for the relevant hazard area. Programs are included to improve future efforts to prevent and mitigate disasters, minimize climate change and associated hazards, and to ensure that communities are well-prepared ahead of disasters and emergencies. This update maintains a focus on mutual aid, coordination, and the protection of critical infrastructure.

Climate Change Mitigation

The Safety Element places an emphasis on mitigating the impacts of climate change and preventing climate disasters by reducing greenhouse gas emissions, which is consistent with policies found in the Framework Element, 2021-2029 Housing Element, Mobility Plan 2035 (Circulation Element) and Plan for a Healthy Los Angeles (Health Element).

With respect to climate change mitigation, this amendment to incorporate the updated LHMP is consistent with the General Plan's **Framework Element** which sets the goal of using land use to create a sustainable and high-quality built environment throughout Los Angeles, especially by locating land uses and transit infrastructure to reduce pollution and greenhouse gas effects associated with vehicle trips and emissions.

The Framework Element states the following:

Goal 3A *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of*

environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

Objective 3.2 *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*

Goal 3K *Transit stations to function as a primary focal point of the City's development.*

Goal 3L *Districts that promote pedestrian activity and provide a quality experience for the City's residents.*

With respect to climate change mitigation, this amendment is consistent with the **2021-2029 Housing Element** which promotes sustainability in land use patterns, strategies to promote quality of life and make Angelenos more housing secure and, encourages green building design for housing stock.

The Housing Element states the following:

Objective 3.2 *Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.*

Policy 3.2.1 *Promote the integration of housing with other compatible land uses at both the building and neighborhood level.*

Policy 3.2.2 *Promote new multi-family housing, particularly Affordable and mixed income housing, in areas near transit, jobs and Higher Opportunity Areas, in order to facilitate a better jobs-housing balance, help shorten commutes, and reduce greenhouse gas emissions.*

Policy 3.2.3 *Provide outreach and education to the public about the need to address housing needs in relation to other important outcomes, including health, transportation, and the environment, to support overall sustainability goals.*

Policy 3.2.4 *Provide streamlining, incentives and flexibility for residential buildings that promote energy and resource conservation particularly those that exceed existing green building standards.*

Policy 3.2.5 *Promote and facilitate reduction of water, energy, carbon and waste consumption in new and existing housing.*

Policy 3.2.6 *Promote outreach and education to property owners, tenants and homebuilders regarding environmentally sustainable residential development practices.*

Policy 3.2.7 *Provide environmentally sustainable development standards and incorporate sustainable best practice in building and zoning code updates.*

Policy 3.2.8 *Provide incentives and promote flexibility for the conversion of non-residential structures to new housing in order to reduce the carbon footprint resulting from demolition and new construction.*

With respect to climate change mitigation, this amendment is consistent with Mobility Plan 2035 (General Plan **Circulation Element**) which emphasizes active, environmentally sustainable mobility that limits the further impact of greenhouse gas emissions on the climate and climate change-related hazards.

The Mobility Plan states the following:

Policy 5.1 Sustainable Transportation: *Encourage the development of a sustainable transportation system that promotes environmental and public health.*

Policy 5.2 Vehicle Miles Traveled (VMT): *Support ways to reduce vehicle miles traveled (VMT) per capita.*

Policy 5.3 Alternative Metrics: *Support a range of transportation metrics to evaluate the multiple purposes that streets serve.*

Policy 5.4 Clean Fuels and Vehicles: *Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.*

Policy 5.5 Green Streets: *Maximize opportunities to capture and infiltrate stormwater within the City's public rights-of-way.*

With respect to general disaster prevention and climate change mitigation, this amendment is consistent with the General Plan's Plan for a Healthy LA (**Health Element**) which states the following:

Policy 5.6 *In collaboration with public, private, and nonprofit partners, increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change, and target resilience in the most vulnerable communities.*

The amendment to the Safety Element is consistent with the policies related to climate change in the Framework Element, Plan for a Healthy LA (Health Element), Mobility Plan (Circulation Element) and Housing Element as the Safety Element highlights efforts to address the underlying causes of climate change to mitigate its impacts. Objective 1.2 of the Safety Element, directs the City to set measurable targets for carbon reduction, build resilience to better navigate climate uncertainty, and to address the unequal burden of climate change impacts. Policies and programs encourage the proper management, and if possible, the conservation of natural resources, systems, and services that make the city environment more resilient to disasters. There is increased emphasis on resilient and sustainable energy and water systems as well as a high-quality built environment and mobility system that minimizes greenhouse gas emissions and other burdens, especially those faced by low-income families and communities of color. This is aligned with the emphasis on resources, capacity-building, social programs, and services to foster resilient communities.

Safety Element Goal 2: Emergency Response

The amended Safety Element emphasizes the need for rapid, effective and coordinated emergency response, which is consistent with policies in the Framework Element.

With respect to general disaster response, this amendment is consistent with the General Plan's **Framework Element** which includes coordinating rapid disaster response, minimizing interruptions of critical services, and quickly restoring services should they be interrupted in case of a disaster. The Framework Element emphasizes that each neighborhood be informed and

prepared for emergencies and that communities are able utilize available resources and coordinate with first responders.

The General Plan Framework Element states the following:

Objective 9.4 *Ensure continued provision of wastewater collection and treatment after an earthquake or other emergency.*

Policy 9.4.1 *Restore minimal operations as soon as possible after an emergency, and full operations as soon as feasible.*

Policy 9.4.2 *Establish joint cooperation agreements with other jurisdictions for mutual assistance during emergencies.*

Objective 9.11 *Ensure, to the extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.*

Policy 9.11.1 *Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.*

Goal 9I *Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.*

Objective 9.15 *Provide for adequate public safety in emergency situations.*

Policy 9.15.1 *Maintain mutual assistance agreements with local law enforcement agencies, state law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.*

Goal 9J *Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.*

Policy 9.19.1 *Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.*

Policy 9.19.2 *Maintain special fire-fighting units at the Port of Los Angeles, Los Angeles International Airport, and Van Nuys Municipal Airport capable of responding to special emergencies unique to the operations of those facilities.*

Policy 9.19.3 *Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.*

Objective 9.25 *Utilize park space in emergency situations.*

Policy 9.25.2 *Continue to utilize parks and recreation facilities as shelters in times of emergency.*

Objective 9.3 *Ensure continued electric service after an earthquake or other emergency.*

Policy 9.30.1 *The LADWP shall periodically examine its emergency response programs to ensure continued electrical service.*

Policy 9.35.1 *Support the special needs of urban emergency and public safety services and benefit the largest number of people.*

Policy 9.37.2 *Improve the City's existing emergency telecommunications systems so that it can better respond to and mitigate the impacts of various emergency situations.*

The Safety Element provides information on the activation of emergency procedures, including the response functions of the Emergency Management Department and the activation of emergency roles by and for the Office of the Mayor. The Element articulates a goal of rapid and coordinated emergency response.

The Safety Element, and related plans including the LHMP, the Emergency Operations Plan, and individual department emergency plans minimize disruption to critical infrastructure and city services in the event of an emergency or disaster and prepare agencies to coordinate responses and the provision of mutual aid. The Element additionally emphasizes the evaluation of neighborhood vulnerabilities and policies and programs to strengthen community disaster response capacity. Finally, the amended Safety Element reinforces the value of Mutual Aid Agreements and coordination between departments and surrounding jurisdictions.

Safety Element Goal 3: Disaster Recovery

The amended Safety Element places an emphasis on resilient and equitable restoration of public and private assets immediately following a disaster. With respect to general disaster recovery, this amendment is consistent with the General Plan **2021-2029 Housing Element** which emphasizes planning for housing needs resulting from climate change events as well as promoting resilience to housing displacement among vulnerable Angelenos as a direct or indirect result of disasters.

The General Plan 2021-2029 Housing Element states the following:

Policy 3.3.3 *Plan for emergency housing needs that will result from disasters and climate events.*

Policy 3.3.4 *Plan for post-disaster housing recovery that promotes equity, resilience, environmental sustainability and safety. Work to ensure a right of return to existing residents if housing is retrofitted or reconstructed after a disaster.*

Policy 3.3.7 *Provide assistance to mitigate the impacts and financial disruption of emergencies in order to support Angelenos to stay in their homes.*

The Safety Element sets Goals and Objectives for highly coordinated disaster recovery to restore the built environment, including housing, to conditions equal or better than those which existed prior to any disaster events. This is consistent with the General Plan Framework Growth Strategy. The Safety Element is consistent with Housing Element policies for post-disaster rebuilding and construction, adding further detail on when, where, and how to rebuild and construct housing that is sustainable and disaster resilient. The Safety Element and Housing Element are also consistent in their additional consideration of anti-displacement Goals, Objectives, and Policies to promote equity in disaster impacts and resilience.

State Planning Requirements

Government Code Section 65302(g) and the other statutes that regulate Safety Elements do not require separate findings to amend the Safety Element.

CEQA Findings

The proposed amendment to the Safety Element is not a “project” pursuant to CEQA Guidelines Section 15378(b)(5). As such, it is determined based on the whole of the administrative record, including the draft Notice of Exemption justification in the Project file, that the Project is exempt from CEQA pursuant to Public Resources Code Section 21080(b)(1) and CEQA Guidelines Section 15308 (Class 8) and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies; and that pursuant to CEQA Guidelines Section 15378(b)(5), that the Project is not a “project” as defined by CEQA.