

Addendum to the Los Angeles County General Plan 2035 Update Final EIR

LA COUNTY

PLANNING

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1

INTRODUCTION AND PURPOSE

1.1 CEQA Compliance

1.2 Incorporation by Reference

1. INTRODUCTION AND PURPOSE

1.1. CEQA Compliance

The County of Los Angeles Department of Regional Planning (County) is the lead agency for the General Plan Tune-Up Series 001 Project (Project). The County certified the Los Angeles County General Plan Update Final Environmental Impact Report (certified EIR) in March 2015, which serves as the primary California Environmental Quality Act (CEQA) document for the General Plan 2035 (General Plan or GP). The General Plan is a long-range planning document that covers a range organized around the Planning Areas Framework and associated Area Plans, explained in Chapter 5 of the General Plan. Together with the earlier Draft EIR (County of Los Angeles, 2014b), the certified EIR (County of Los Angeles, 2015c) provides the program-level environmental analysis that informs this Addendum. This Addendum to the certified EIR (County of Los Angeles, 2015c) is prepared pursuant to CEQA Guidelines section 15164.

An addendum is the appropriate CEQA document for the current Project pursuant to CEQA Guidelines section 15164. An addendum to previously certified EIR is appropriate where some changes or additions to the EIR are necessary, but do not trigger any of the conditions in section 15162 calling for preparation of a subsequent EIR. CEQA Guidelines section 15164 further provides that an addendum need not be circulated for public review. Addendums must be considered by the decision-making body along with the certified EIR, and must include a brief explanation, supported by substantial evidence, of the decision not to prepare a subsequent EIR.

The Project is a targeted tune-up of the Los Angeles County General Plan. It is limited in scope, maintains the GP's fundamental framework and policy structure, and does not alter the nature or scope of effects analyzed in the certified EIR. The Project also includes limited map updates to adopted Area Plans that are part of the GP Framework that is included in Chapter 5: Planning Areas Framework and associated Area Plans. These updates are confined to conforming the GP-level land use and zoning maps to previously adopted and CEQA-certified area plan actions, and do not introduce new policies or development potential. Specifically, the Project includes the following Area Plan map updates (processed as a specific plan amendment and a zone change):

- **Specific Plan Amendment No. RPPL2025003977:** Amends the Connect Southwest LA Specific Plan to update land use policy and zoning maps to reflect current information in the previously adopted Metro Area Plan; and
- **Zone Change No. RPPL2025003976:** Updates zoning maps to reflect current information in the previously adopted community-based plans.

Updates to Area Plan land use and zoning maps reflect previously adopted and CEQA-certified Area Plan documents and maintain consistency with the General Plan's Planning Areas Framework (i.e., Chapter 5 of the certified GP EIR).

The Addendum relies on the environmental analysis in the certified GP EIR; no new or different physical changes to the environment would occur beyond the uses and intensities already evaluated. With respect to the limited scope, and based on the analyses contained in this Addendum, the County determined that none of the triggers for a subsequent or supplemental EIR are present.

In deciding whether a subsequent or supplemental EIR is necessary or if an addendum is appropriate, the standard of review is whether the record as a whole contains substantial evidence to support a determination that the

changes in the project or its circumstances are substantial enough to make major modifications to the certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (see CEQA Guidelines Section 15162). A subsequent or supplemental EIR may also be required if new information, not known at the time the prior certified EIR, becomes available and shows new or more severe significant environmental impacts. If the project would not cause new or more severe impacts, and only minor technical changes are required, the lead agency may adopt an addendum (see CEQA Guidelines Section 15164).

Consistent with CEQA Guidelines section 15164, the County has prepared this Addendum to demonstrate that the impacts and mitigation requirements identified in the certified EIR remain substantively unchanged by the Project. The County's decision-making body will consider this Addendum together with the certified EIR when taking action, and the administrative record includes the required explanation supporting the decision not to prepare a subsequent or supplemental EIR as required by CEQA Guidelines section 15164(e).

1.2. Incorporation by Reference

As stated in CEQA Guidelines Sections 15150(a), an EIR may incorporate by reference all or portions of another document that has been made part of the public record. This approach is suitable for public agencies to reduce delay and paperwork (CEQA Guidelines Section 15006(t)). All documents pertaining to the approval and adoption of the GP are hereby incorporated by reference and made a part hereof. The documents incorporated by reference, which will be cited as appropriate throughout this EIR Addendum, include the following:

- Los Angeles County General Plan Update Final Environmental Impact Report and Mitigation Monitoring and Reporting Program. Adopted March 2015.
- Los Angeles County General Plan 2035. Adopted October 6, 2015.
- Los Angeles Countywide Parks and Recreation Needs Assessment (PNA). Adopted July 5, 2016.
- Connect Southwest LA Specific Plan. Adopted July 23, 2019.
- Transportation Impact Analysis Guidelines implementing Vehicle Miles Traveled (VMT). Adopted July 23, 2020.
- Vision Zero Los Angeles County: A Plan for Safer Roadways. Adopted August 4, 2020.
- Santa Monica Mountains North Area Plan (North Area Plan). Adopted May 4, 2021.
- Parks Needs Assessment Plus (PNA+). Adopted December 6, 2022.
- Metro Area Plan (MAP). Adopted May 21, 2024.



2

DESCRIPTION OF THE PROPOSED PROJECT

2.1 Project Description

2. DESCRIPTION OF THE PROPOSED PROJECT

2.1. Project Description

The Project is a targeted update to the adopted GP, focused exclusively on correcting inconsistencies and errors, and aligning policies with current County practices and State requirements. This limited-scope update maintains the fundamental framework, development intensity, and timing established in the GP, while ensuring the document remains accurate, legally compliant, and responsive to current planning standards.

For administrative purposes, the Project is processed through a set of related County cases, which together comprise the General Plan Tune-Up Series 001, as described below:

GP Amendment No. RPPL2025003223: Establishes the General Plan Tune-Up Program to conduct ongoing Tune-Up series for the GP focused on correcting inconsistencies and errors to ensure clarity, accuracy, and CEQA compliance.

GP Amendment No. RPPL2025004151: (GP Tune-Up Series 001 Project): Includes edits to the GP that fall within two distinct categories:

- **Administrative and Technical Corrections:** These edits correct typographical, grammatical, citation, pagination, cross-reference, labeling, and data transcription errors; improve clarity of formatting and references (headings, numbering, cross-references, figure legends, and table captions); and update maps, figures, and datasets to reflect current information and correct inconsistencies without altering policy direction. These edits would include updates to the following Area Plan land use and zoning maps:
 - **Specific Plan Amendment No. RPPL2025003977:** Amends the Connect Southwest LA Specific Plan to update land use policy and zoning maps to reflect current information in the previously adopted Metro Area Plan as part of the Planning Areas Framework established in General Plan Chapter 5.
 - **Zone Change No. RRPL2025003976:** Updates the zoning maps to reflect current information in the previously adopted community-based plans part of the Planning Areas Framework established in General Plan Chapter 5.
- **Policy Alignment:** These edits align policy text with current County programs, adopted plans, and State and regional regulatory requirements.

Environmental Assessment No. RPPL2025003254: Documents CEQA review of the Project through this Addendum to the certified GP EIR. All of the proposed changes to the GP, related specific plan, and zoning maps are limited to administrative corrections and targeted policy alignments. The proposed changes do not alter the physical development capacity, environmental protections, or mitigation measures analyzed in the certified EIR. As these modifications do not create new significant environmental impacts or substantially increase the severity of previously identified impacts, an Addendum to the certified EIR is the appropriate level of environmental review pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15164.

2.1.1. GP MODIFICATIONS OVERVIEW

The Project organizes proposed edits into two distinct categories based on their purpose and scope. This approach ensures systematic review and appropriate CEQA compliance while maintaining the integrity of the GP's programmatic framework. County departments have reviewed the GP for corrections and updates and identified proposed edits within the two categories. The intent of the edits is to improve the GP's functionality without altering its fundamental land use assumptions, or the environmental impact analysis of the certified EIR.

2.1.1.1. ADMINISTRATIVE AND TECHNICAL CORRECTIONS

The Administrative and Technical Corrections category consists of strictly ministerial, non-substantive edits that correct editorial and referencing errors (typographical, grammatical, citation, pagination, cross-reference, labeling, and data transcription), standardize formatting and references, and update maps, figures, and datasets to reflect previously adopted actions. Administrative and Technical Corrections edits do not alter policy direction, development intensity, geographic applicability, timing, or environmental protections evaluated in the certified EIR, and they do not create new significant environmental impacts or substantially increase the severity of previously identified impacts. The details of the corrective actions and text edit types are described in Table 2-1.

Table 2-1. Administrative and Technical Correction Type

Correction Types	Action	Example
Administrative/ Formatting	<ul style="list-style-type: none"> Correct grammar and spelling. Fix pagination and layout. Update the table of contents, headings, numbering, cross-references, and figure legends. Remove formatting artifacts. <p>These edits must not change the meaning or effect of any provision.</p>	<ul style="list-style-type: none"> Standardize capitalization of General Plan. Resolve orphan headings and insert proper page breaks; clean up margins and spacing. Refresh the Table of Contents and Lists of Figures/ Tables after renumbering. Renumber headings, figures, and tables to maintain sequence and consistency. Standardize figure legends and captions; add missing source lines. Remove leftover tracked-change artifacts, double spaces, hidden comments, and inconsistent quotation marks.

Correction Types	Action	Example
Clarification	<ul style="list-style-type: none"> • Reword for clarity. • Add or refine definitions. • Spell out acronyms. • Update citations, URLs, and plan or ordinance titles. • Update references to County departments, divisions, program names, and implementing responsibilities to reflect organizational changes since GP adoption. 	<ul style="list-style-type: none"> • Rephrase passive or ambiguous text to clear, active requirements (e.g., “Applicants shall prepare…”). • Add or refine glossary definitions (e.g., “Community Benefits Agreement,” “Renewable energy generation facility”). • Spell out acronyms on first use (e.g., “Specific Plan (SP),” “State Implementation Plan (SIP)”). • Replace outdated citations and broken URLs with current code sections and County webpages; correct ordinance titles and years. • Update references to departments to match current structure, such as adding the Department of Economic Opportunity, which now oversees County economic programs. • Reassign implementing responsibility where oversight has shifted without changing scope (e.g., “Lead: Department of Economic Opportunity; Support: Regional Planning and Public Works”). • Update program names to current County terminology while keeping policy scope intact.
Map/Data Corrections	<p>Update maps, figures, tables, labels, and datasets to reflect adopted boundaries, current program names, or corrected attributes. These edits must reflect adopted decisions and factual corrections only. They must not change designations, overlays, standards, or development potential.</p>	<ul style="list-style-type: none"> • Replace a community boundary figure to reflect Board-adopted annexations since GP adoption. • Correct a mislabeled roadway on a mobility map. • Update total acreage in a land use table to match current GIS rounding. • Change a legend status from “Proposed” to “Adopted” where a Board action has occurred. • Swap in the latest County-maintained dataset for the same layer (e.g., updated floodplain or bikeway inventory) without altering designations. • Fix figure labels and units (miles vs. kilometers); standardize symbology and scale bars. • Correct table footnotes to cite the correct adoption date or resolution number.

Administrative and Technical Corrections do not include changes that:

- Create, delete, establish, or substantively amend any goal, policy, program, regulation, standard, land-use designation/overlay, or zoning text;
- Add, remove, or revise a mitigation measure, performance standard, threshold of significance, or analytical methodology in a manner that would alter conclusions;
- Expand or reduce mapped boundaries, capacities, densities, or intensities, or otherwise change development potential;
- Modify the project description, footprint, approvals, phasing, or timing analyzed in the EIR;
- Relax environmental protections or change the applicability of adopted standards; or
- Require discretionary judgment or rely on new assumptions that would change the basis of the EIR analysis.

2.1.1.2. POLICY ALIGNMENT

The Policy Alignment category includes, but is not limited to, text and policy edits to align GP language with adopted State laws, regulations, and County guidance that have been enacted or updated since the GP adoption. The changes reflect the implementation of existing County policies, compliance with State mandates such as Senate Bill 743's transition to Vehicle Miles Traveled (VMT) analysis, and incorporation of previously adopted plans and assessments, including the Parks Needs Assessment (PNA). These changes maintain the existing GP's programmatic buildout assumptions and land use intensities as analyzed in the certified EIR.

Table 2-2 presents key policy alignment edits organized by GP element. The following discussions explain the rationale for each edit, identify where language would be inserted or removed, and note the implementation details not captured in the table.

MOBILITY ELEMENT (CHAPTER 7)

The Mobility Element requires text changes to align with State-mandated transportation analysis methodologies and current transit system configurations. Senate Bill 743 fundamentally transformed transportation impact analysis by replacing Level of Service (LOS) with VMT as the primary metric for CEQA compliance. Additionally, Metro's rail system has undergone significant rebranding and expansion since 2015, necessitating updates to transit line references throughout the element. The revisions to the Mobility Element include, but are not limited to, descriptions addressing VMT implementation, Vision Zero Action Plan integration, transit system updates, and removal of obsolete programs (see Table 2-2).

PARKS AND RECREATION ELEMENT (CHAPTER 10)

The Parks and Recreation Element requires updates to incorporate the comprehensive PNA and PNA+ studies completed since 2015¹. These assessments provide updated data on park access equity, community needs, and service gaps that must be considered in the GP. Additionally, Measure A funding mechanisms and program references require updating to reflect current implementation status. The revisions to the element include integrating the PNA and PNA+ information, establishing a new “Urban Natureways” park classification, and updating descriptions of funding mechanisms (see Table 2-2).

ECONOMIC DEVELOPMENT ELEMENT (CHAPTER 14)

The Economic Development Element requires updates that focus on emerging economic sectors, particularly the life sciences industry cluster, which has become a priority economic development focus for the County. References to outdated economic development programs are removed and replaced with current initiatives. The element includes two policy alignments addressing the life sciences sector integration and program modernization (see Table 2-2).

¹ General Plan Implementation Programs Adopted the Parks and Recreation Needs Assessment (PNA) and the Parks Needs Assessment Plus (PNA+) as a component of the General Plan. Both plans were adopted by the Board of Supervisors in 2016 and 2022, and this action will adopt the plans as a component of the GP as specified in the GP Implementation Programs, P/R-1: County Parks and Recreation Master Plan.

Table 2-2. Policy Alignments by Element

Element	Description of Policy Alignment
Mobility Element (Chapter 7)	<p>Language Added: In accordance with Senate Bill 743, passed in 2013, transportation impacts for projects undergoing CEQA review will be measured using the Vehicle Miles Traveled (VMT) metric instead of the previous Level of Service (LOS) metric. A project's VMT impact is calculated by multiplying the daily vehicle trips that the project is expected to generate by the distance of those trips. The VMT metric reflects the County's long-term goals of providing a comprehensive approach that includes planned land uses and supportive transportation options to produce a more sustainable urban environment. The County will continue implementing multimodal transportation, active transportation design, travel demand management, and land use policies and goals to reduce Countywide VMT.</p>
	<p>Language Added: Neighborhood Electric Vehicles (NEVs):</p> <p>NEVs are small, low-speed vehicles designed for short trips within neighborhoods, gated communities, or other restricted areas. The State Vehicle Code defines a low-speed vehicle as a "motor vehicle with 4 wheels that is capable of a minimum speed of 30 miles per hour and maximum speed of 25 miles per hour on a paved level surface and that has a gross vehicle weight rating of less than 3,000 pounds." State Assembly Bill 2432, adopted in 2022, authorizes Los Angeles County and cities within the County to establish a NEV transportation plan subject to certain requirements.</p> <p><i>NEV Transportation Plan</i></p> <p>The purpose of a NEV transportation plan is to further the vision of creating a sustainable region that reduces gasoline demand and vehicle emissions by offering a cleaner, more economical means of local transportation within a plan area. NEV transportation plans should be designed and developed to best serve the functional travel needs of the community, to have the physical safety of the NEV driver's person and property as a major planning component, and to have the capacity to accommodate NEV drivers of every legal age and range of skills. An NEV transportation plan should describe the specific duties required of NEV operators, applicable provisions of signing and striping, and the key design parameters that will make NEVs a practical option for mobility throughout plan areas in Los Angeles County.</p>
	<p>Language Added: Vision Zero:</p> <p>Vision Zero is a traffic safety strategy to eliminate traffic-related fatalities and severe injuries. It is an international movement that emphasizes a new approach to traffic safety, acknowledging that people make mistakes and focusing on system-wide practices, policies, and designs to lessen the severity of collisions. In August 2020, the Los Angeles County Board of Supervisors adopted the County's inaugural Vision Zero Action Plan. The Action Plan guides the County's efforts to reduce traffic deaths and severe injuries on unincorporated County roadways and includes 63 multidisciplinary actions to advance road safety in the County. For more information on Los Angeles County's Vision Zero projects and programs, visit VisionZeroLACounty.com.</p>

Element	Description of Policy Alignment
<p>Parks and Recreation Element (Chapter 10)</p>	<p>Language Added: Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment (PNA)</p> <p>Adopted by the Board of Supervisors in July, 2016, the Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment (PNA) established a modern policy framework for parks, recreation, and open space within Los Angeles County. The PNA positioned parks and recreation facilities as essential public infrastructure necessary to support community health, safety, environmental quality, and overall quality of life. The PNA advanced a data-driven approach to park planning and investment by applying objective metrics to quantify and map park need, and supporting both community-identified priorities and deferred maintenance of existing facilities. Through adoption of the PNA, the Board of Supervisors affirmed that parks are vital public assets. As essential infrastructure, parks improve public health outcomes, community identity and cohesion, environmental resilience, and local economic vitality.</p> <p><i>Parks and Recreation Needs Assessment Plus (PNA+)</i></p> <p>In December 2022, the Board of Supervisors adopted the Parks Needs Assessment Plus (PNA+), establishing a national model for park equity and comprehensive regional planning. While the 2016 PNA focuses on local park needs, determining levels of park need in large part based on population density, the PNA+ expands that framework and analysis by assessing needs related to environmental conservation and restoration of degraded lands, regional recreation, and rural recreation. The PNA+ provides a more nuanced understanding of the distribution of environmental benefits and burdens across the County, as well as park and recreation needs unique to rural areas.</p> <p>PNA+ calls for a more holistic approach to conservation that includes both the protection of existing natural lands and the restoration of degraded urban lands, forming the foundation for the County’s strategy to conserve at least 30 percent of lands and waters by 2030 (30x30). It identifies priority areas for regional and rural recreation using indicators such as population vulnerability, access to recreation by multiple modes of travel, availability of park facilities, and the types of amenities offered.</p> <p>Building on the needs and priorities identified in the PNA and PNA+, the County will articulate goals, strategies, actions, priority sites, and opportunity areas to guide implementation. This includes focusing on the highest-need areas; advancing multi-benefit park investments that address personal, social, economic, and environmental needs; restoring degraded lands to create new parks and open space; and providing diverse amenities that support equitable distribution and prioritize underserved communities.</p> <p>Language Added: Urban Natureways. Urban Natureways are regional linear parks that repurpose existing public infrastructure, such as flood control channels and utility corridors, into multi-benefit greenways that integrate recreation, active transportation, and habitat restoration. These corridors strengthen ecological connectivity, biodiversity, climate resilience, social equity, and local economic opportunity. Urban Natureways reimagine publicly owned spaces as inclusive public assets, linking communities, parks, schools, and cultural destinations, and advance environmental justice by bringing nature into underserved areas while converting infrastructure that once divided neighborhoods into corridors that reconnect and revitalize them. Amenities for urban natureways can include multi-use paths and trails, shade trees, native and drought-tolerant landscaping, habitat areas, lighting, seating, interpretive signage, and community gathering spaces. There are no size criteria or service radius areas associated with Urban Natureways.</p>

Element	Description of Policy Alignment
	<p>Language Added: Since 1992, Proposition A Funds have supported the acquisition, development, improvement, restoration and maintenance of parks; recreational, cultural and community facilities; and open space lands. These funds are administered by the Los Angeles County Regional Park and Open Space District. The Open Space District was established following voter approval of Proposition A in 1992. In 1996, voters approved another Proposition A to fund parks and recreation projects and additional funds for maintenance and to service those projects. This assessment expired in June of 2019.</p> <p>To ensure the continuation of local park funding, Los Angeles County voters approved Measure A in November 2016. Revenue generated through Proposition A and Measure A has supported a wide range of initiatives, including public safety enhancements at existing parks, recreation and beach facilities; acquisition and development of new parkland and open space, construction of senior centers and facilities serving at risk youth; trail development; river and stream restoration; graffiti prevention; tree planting; and other park and recreation improvements.</p>
	<p>Language Removed: Proposition A authorized an annual assessment on nearly all of the 2.25 million parcels of real property. Proposition A funded \$540 million for the acquisition, restoration or rehabilitation of real property for parks and park safety, senior recreation facilities, gang prevention, beaches, recreation, community or cultural facilities, trails, wildlife habitats, or natural lands, and maintenance and servicing of those projects. In 1996, voters approved another Proposition A to fund an additional \$319 million for parks and recreation projects and additional funds for maintenance and to service those projects.</p>
	<p>Language Removed: Landscaping and Lighting Districts. The California Landscaping and Lighting Act of 1972 authorizes local legislative bodies to establish benefit related assessment districts, or Landscaping and Lighting Districts (LLADs), and to levy assessments for the construction, installation, and maintenance of certain public landscaping and lighting improvements. LLADs may be established to maintain local public parks.</p>
	<p>Language Added: Add PNA and PNA+ in “Park and Recreation Element Implementation Program.”</p>

Element	Description of Policy Alignment
<p>Economic Development Element (Chapter 14)</p>	<p>Language Removed: Biomedical section.</p> <p>Language Added: Life Sciences Section:</p> <p>The Life Sciences sector is a critical and burgeoning component of Los Angeles County's economy, currently providing approximately 38,000 jobs with average annual wages of \$116,000—70% above the County average. Notably, nearly 60% of these positions do not require a four-year college degree, and jobs not requiring a bachelor's degree still offer average wages exceeding \$85,000, underscoring the sector's potential for high-paying, inclusive employment. The County's Life Sciences workforce is also notably diverse, with 37% of workers identifying as Hispanic or Black. Recognizing this immense potential, and despite a historical job growth of 9% (adding 3,250 jobs) between 2012 and 2023 which lagged the national average of 28%, the County is resolutely committed to fostering accelerated growth. The goal is to attract and anchor more companies, aiming to create approximately 4,000 new direct jobs within LA County and contribute to a total of 10,000 new jobs in the Greater LA region by 2030. Major companies like Grifols, with its significant plasma operations, and Takeda, a key employer in biomanufacturing, are examples of the established industry presence the County seeks to expand and support.</p> <p>To achieve this vision, the LA County Department of Economic Opportunity has established a dedicated Life Sciences Advisory Board and partnered with Dalberg Advisors to develop a comprehensive Life Sciences Industry Strategy. The strategy has identified key binding constraints such as the scarcity of affordable "graduation space" for scaling companies, a complex business and regulatory environment, regional fragmentation, and lack of a unified vision and messaging to highlight the local industry. Key areas of focus during implementation include graduation space development, championing zoning and permitting reform modeled on recent successful efforts in the City of Pasadena, and enhancing business retention and attraction efforts, among other strategic priorities designed to cultivate a globally competitive and inclusive life sciences ecosystem.</p>



3

ENVIRONMENTAL ANALYSIS

- 3.1 Land Use and Regional Planning
- 3.2 Recreation
- 3.3 Transportation and Traffic

3. ENVIRONMENTAL ANALYSIS

The discussion below addresses the Policy Alignment edits to the GP. Section 3.1 through Section 3.3, and focuses on the resource issues from the certified EIR that are relevant to the Policy Alignment edits. All other resource issues evaluated in the certified EIR, which would not be affected by the Project's Policy Alignment edits, are discussed in detail in Chapter 4.

The Administrative and Technical Corrections category of the Project includes edits that update GP text, figures, and tables to the plans, ordinances, and development project approvals adopted since the certified EIR. These corrections are needed to keep the GP internally consistent with actions adopted since 2015 and to maintain an accurate administrative record. Per CEQA Guidelines section 15164, a lead agency may prepare an addendum to address minor technical changes or additions to an EIR. The administrative edits and technical corrections listed in Table 2-1 would not introduce a change to the planning scenarios, analytical assumptions, or policies that were evaluated in the certified EIR. Given that these edits are administrative in nature, they do not require additional environmental analysis because they implement previously approved actions and only reconcile GP content to those actions, with no change to land use designations, development intensity, mapped boundaries, mitigation requirements, thresholds, or analytical methods. The Administrative and Technical Corrections to the GP would not create new significant environmental impacts or increase the severity of previously identified impacts, and the addendum to the certified EIR is the appropriate CEQA document to address these edits. No further evaluation of the Administrative and Technical Corrections listed in Table 2-1 is warranted.

3.1. Land Use and Related Planning

3.1.1. BASELINE CONDITIONS

The certified EIR and the GP establish the County's land use framework for unincorporated areas, including the GP Land Use Map, related community and area plan designations, applicable zoning overlays, and implementation through zoning and ordinances (County of Los Angeles, 2015a and 2015c).

Since the GP adoption in 2015, County economic development practices and regional partner terminology have shifted from the narrower "Biomedical" label to the broader "Life Sciences" industry. The broader "Life Sciences" discussion includes biomedical research and manufacturing as well as biopharmaceuticals, medical devices, diagnostics, digital health, and related support services. The proposed edit to the Economic Development Element replaces the "Biomedical" section with a "Life Sciences" section to align the GP narrative with current terminology and programmatic focus and to maintain internal consistency with how the sector is now described in State and regional frameworks. This narrative alignment would not change the program-level land use framework of the GP.

Accordingly, the baseline for this Addendum remains the land use pattern, designations, and regulatory framework documented in the certified EIR and GP (County of Los Angeles, 2015a and 2015c). The Life Sciences narrative update responds to changes in sector terminology and program guidance since 2015 and is intended to maintain consistency between the General Plan text and current County and regional frameworks.

3.1.2. SUMMARY OF FINAL EIR IMPACT CONCLUSIONS

The certified EIR evaluated land use and related planning at a program level, focusing on consistency with the GP's policy framework, the GP Land Use Map, and applicable community and area plans; potential conflicts with adopted plans, policies, and regulations; and the extent to which implementation of the GP could physically divide established communities (County of Los Angeles, 2015c). The analysis recognized that subsequent discretionary actions would implement the GP through zoning and ordinances and that site-specific proposals would undergo project-level review for conformance with applicable policies and standards (County of Los Angeles, 2015a and 2015c).

The certified EIR concluded that program-level land use impacts would be less than significant with implementation of GP policies and standards and that no significant and unavoidable land use impacts were identified at the program level. The certified EIR found that implementation of the GP would not physically divide established communities and would be consistent with adopted plans and regulations. Subsequent projects resulting from implementation of the GP would be required to demonstrate consistency with the adopted GP, community and area plans, and applicable ordinances (County of Los Angeles, 2015a and 2015c).

Accordingly, the GP established a regulatory framework in which later legislative or project-level actions would be reviewed for consistency with the adopted GP, community and area plans, and applicable ordinances. The certified EIR concluded that the GP was designed to be consistent with applicable plans, policies, and regulations and that implementation of the GP would not result in a significant land use impact at the program level. No land use mitigation measures were adopted in the certified EIR.

3.1.3. CONSIDERATION OF CHANGES TO IMPACT CONCLUSIONS

The proposed update in the Economic Development Element of the GP (Chapter 14) replaces a Biomedical narrative with a Life Sciences narrative. The update provides descriptive context for the County's Life Sciences industry section and aligns the GP with current County and regional terminology adopted since 2015. The Life Sciences industry includes biomedical research and manufacturing, biopharmaceuticals, medical devices, diagnostics, digital health, and related support services.

This change in GP text provides descriptive context and policy support for an industry sector but would not modify the GP Land Use Map, community or area plan designations, permitted uses, allowable densities or floor-area ratios, overlay policies, or other land use controls (County of Los Angeles, 2015a and 2015c). It would not adopt zoning or permitting reforms, commit the County to site-specific development, or revise countywide growth forecasts used in the certified EIR (County of Los Angeles, 2015c).

Because the text update is non-regulatory and would not alter maps, designations, or intensities that govern physical development, it would not create new land use conflicts, physically divide established communities, or change the conclusions of the certified EIR. Any future zoning or permitting changes, or any facility proposals that may be informed by the Life Sciences section, would require separate legislative action or discretionary approvals and project-level CEQA review for consistency with the GP and applicable ordinances (County of Los Angeles, 2015a and 2015c).

Accordingly, the Life Sciences narrative update would not result in new significant land use impacts or a substantial increase in the severity of impacts identified in the certified EIR. The certified EIR concluded that program-level land use impacts would be less than significant and that implementation of the GP would not physically divide

established communities and would be consistent with adopted plans and regulations (County of Los Angeles, 2015c). The proposed Life Sciences narrative update would not introduce a new land use impact and would not increase the severity of any land use impact previously evaluated in the certified 2015 EIR.

3.1.4. SUMMARY OF FINDINGS

Based on the information presented for this Addendum, the proposed Life Sciences narrative update in the Economic Development Element (Chapter 14) of the GP would not create a new significant land use impact nor increase the severity of a land use impact evaluated in the certified EIR (County of Los Angeles, 2015c). Specifically, the update:

- Would not change the GP Land Use Map, community or area plan designations, overlays, or allowable densities/ Floor Area Ratios, and therefore would not alter the physical land use setting evaluated at the program level in the certified EIR (County of Los Angeles, 2015a and 2015c);
- Would not adopt zoning or permitting reforms or authorize site-specific development. Any such actions would require separate legislative or discretionary approvals and project-level CEQA review for consistency with the GP (County of Los Angeles, 2015a and 2015c); and
- Would not revise countywide growth forecasts or otherwise change the assumptions that inform the certified EIR's program-level land use analysis (County of Los Angeles, 2015c).

Accordingly, no new or more severe significant impacts to land use and related planning policies and programs would occur from the proposed update. Preparation of an addendum is appropriate pursuant to CEQA Guidelines sections 15162 and 15164.

3.2. Recreation

3.2.1. BASELINE CONDITIONS

The certified EIR described the County's integrated system of local and regional parks, beaches, trails, and recreation facilities operated by the Department of Parks and Recreation (DPR) and other public agencies. The local park system includes neighborhood, pocket, and community parks and park nodes that serve daily neighborhood needs. The regional system includes community and regional parks and special-use facilities (e.g., nature centers, botanical gardens, golf courses, and beaches) that serve residents and visitors countywide. The system is connected by a countywide multi-use trail network. The certified EIR also recognized that facilities in adjacent cities and other jurisdictions function as part of the countywide network and serve unincorporated communities and described the GP's goals and policies for recreation and open space. No changes to the types of facilities, classifications, or operating framework have occurred that would alter the certified EIR's baseline description (County of Los Angeles, 2015a and 2015c).

Since the certified EIR, the County has developed and adopted countywide assessment tools and aligned Parks and Recreation policy references and terminology with current County tools and programs (e.g., PNA/PNA+, Measure A/ Regional Park and Open Space District (RPOSD) framework and the new "Urban Natureways" park classification). The tools compile a consistent inventory of existing parks and amenities, measure relative need using transparent metrics, and map opportunities to guide investments. These informational tools, which are listed

below, refine data and mapping but do not change the GP’s adopted framework or service assumptions relevant to CEQA baseline conditions. These updates are limited to Parks and Recreation policy references and terminology; they clarify how adopted County tools and programs are used and would not change policies, service standards, land use designations, or growth projections.

- **Integration of PNA/PNA+ Data and Mapping.** The County uses the Parks and Recreation Needs Assessment (PNA) and Parks Needs Assessment Plus (PNA+) to maintain a current inventory of parks and amenities, to depict access and need, and to prioritize programming and funding under the adopted GP. These tools refine data and maps used to describe existing conditions. They do not establish new regulatory standards, change parkland dedication requirements, or increase development intensity.
- **Measure A and RPOSD Programs.** The updates align the Baseline with the Measure A funding framework administered by RPOSD. The framework provides grant and program administration that implement existing policies. It does not, by itself, approve facilities or require construction. Any funded projects remain subject to discretionary approvals and project-level environmental review consistent with the certified EIR and GP policies.
- **“Urban Natureways” Park Classification.** Urban Natureways are regional linear parks that repurpose existing public infrastructure, such as flood control channels and utility corridors, into multi-benefit greenways that integrate recreation, active transportation, and habitat restoration. It is a subset classification within the Parks and Recreation Element. It applies to corridors and parklands already accounted for in the GP and certified EIR, where relevant. It does not change management responsibilities or service standards, add park acreage, redesignate land uses, designate specific alignments, or authorize construction. Implementation of any future corridor improvements would occur through separate actions and project-level review.

No amendments have been made to the GP’s adopted recreation policies, land use designations, or growth projections that influence recreation demand since the certified EIR. The County continues to implement the GP framework and the certified EIR’s Mitigation Monitoring and Reporting Program for applicable actions (County of Los Angeles, 2015a and 2015c). Incremental facility improvements and acquisitions undertaken through ongoing County programs occur within the GP’s framework and do not change countywide service assumptions that alter the certified EIR analysis (County of Los Angeles, 2015c). Accordingly, the baseline for this Addendum remains the recreation system and policy framework described in the certified EIR and GP.

3.2.2. SUMMARY OF FINAL EIR IMPACT CONCLUSIONS

The certified EIR evaluated recreation at a program level and considered whether implementation of the GP would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated; and/or
- Require the construction or expansion of recreational facilities that could result in an adverse physical effect on the environment (County of Los Angeles, 2015c).

The certified EIR concluded that the implementation of the GP would maintain and enhance the County’s recreation system through goals and policies that promote park acquisition, trail connectivity, joint-use arrangements, and funding mechanisms. The GP did not approve specific park projects, and it includes policies that require project-level environmental review and consistency with resource protection standards. The certified EIR therefore determined that program-level recreation impacts would be less than significant and that any potential future construction or expansion of park and recreation facilities would be addressed through project-specific review of

site conditions, construction effects, and operational considerations. The certified EIR did not identify a significant program-level impact related to the need for, or construction of, new recreational facilities (County of Los Angeles, 2015a and 2015c).

With respect to cumulative conditions, the certified EIR found that countywide growth, in combination with related plans and programs, would not result in significant cumulative recreation impacts because the GP includes policies to maintain and improve park and recreation service as the population grows, and because subsequent projects would be subject to applicable plans, regulations, and environmental review. As a result, the certified EIR did not identify any significant and unavoidable impacts related to recreation (County of Los Angeles, 2015c).

3.2.3. CONSIDERATION OF CHANGES TO IMPACT CONCLUSIONS

Project Policy Alignments include revised references to countywide mapping resources, incorporation of the Measure A funding framework and RPOSD program descriptions, and establishment of a “Urban Natureways” park classification within the Parks and Recreation Element. As described in section 3.2.1, Baseline Conditions, these edits reflect implementation of existing policies using the PNA and PNA+ tools and current funding programs. They do not modify adopted policies or service standards, and they do not change land use designations, densities, growth projections, or authorize specific capital projects (County of Los Angeles, 2015a; 2016a; 2016b; 2022).

The Project would not increase population capacity or change the spatial distribution of growth assumed in the GP, nor would it increase use of neighborhood or regional parks beyond the levels evaluated in the certified EIR. The certified EIR’s program-level policies that maintain and enhance recreation service remain in place and continue to guide subsequent actions. Therefore, no substantial physical deterioration of existing facilities would occur as a result of the Project (County of Los Angeles, 2015a and 2015c).

The Project would not include, approve, or otherwise commit the County to the construction or expansion of recreational facilities. If future park or trail projects are proposed, they would undergo project-level review for site-specific construction and operational effects, consistent with the certified EIR’s programmatic approach and the GP’s policies (County of Los Angeles, 2015a and 2015c). The PNA and PNA+ are informational tools that help prioritize investments; they do not establish new regulatory standards or, by themselves, necessitate construction (County of Los Angeles, 2016a; 2016b; 2022).

The updates are limited to Parks and Recreation policy references and terminology, specifically integration of PNA/PNA+ data and mapping, updates to funding mechanism descriptions (e.g., Measure A/RPOSD programs), and addition of a “Urban Natureways” park classification. These edits clarify how adopted County tools inform programming and prioritization but would not change service standards, parkland dedication requirements, or trigger facility construction. They would not change development intensity or recreation service assumptions evaluated in the certified EIR. The edits reaffirm the GP’s policies that support multimodal access to parks and trails and thereby support the GP’s recreation goals.

As discussed in section 3.2.1, Baseline Conditions, these updates implement adopted policies. They would not increase population capacity or alter the spatial distribution of growth. They would not increase use of existing parks to the point of substantial physical deterioration. They would not require new or expanded recreational facilities that cause adverse environmental effects. The proposed text updates to the Parks and Recreation Element would not introduce a new impact to a recreational facility and would not increase the severity of an impact previously evaluated in the certified 2015 EIR.

3.2.4. SUMMARY OF FINDINGS

Based on the information presented for this Addendum, the proposed text updates to the Parks and Recreation Element would not create new significant recreation impacts nor substantially increase the severity of previously identified impacts (County of Los Angeles, 2015c). The action:

- Would not change buildout capacity or land use designations that drive recreation demand. The GP's population and employment forecasts remain unchanged;
- Would not approve or fund park or trail construction. Any future facilities would undergo project-level environmental review and compliance with applicable plans and regulations;
- Aligns policy references to adopted County frameworks, PNA/PNA+ mapping resources, Measure A/RPOSD funding references, and a clarified classification for "Urban Natureways" parks, without altering service standards, regulatory requirements, or mitigation commitments (County of Los Angeles, 2016b and 2022); and
- Maintains the certified EIR's cumulative conclusions, because the GP's adopted land use designations and intensity assumptions are not modified by the Project, and the mitigation framework remains unchanged. The Project would not revise countywide growth forecasts used for cumulative analysis.

Accordingly, the proposed GP edits would not introduce a new recreation impact, nor would they increase the severity of any recreation impact previously evaluated in the certified 2015 EIR. Preparation of an addendum is appropriate pursuant to CEQA Guidelines sections 15162 and 15164.

3.3. Transportation and Traffic

3.3.1. BASELINE CONDITIONS

The certified EIR described the County's multimodal transportation system that serves unincorporated communities. The roadway network consists of freeways and State highways under Caltrans jurisdiction; principal and minor arterials, collectors, and local streets under County and municipal jurisdictions; designated truck routes and goods-movement corridors; and emergency access routes. It also consists of principal and minor arterials, collectors, and local streets under County and municipal jurisdictions. Other components of this network include designated truck routes, goods-movement corridors, and emergency access routes. Public transportation services include Metro bus and rail, Metrolink commuter rail, and municipal/regional bus operators, along with paratransit services. The active transportation system consists of bikeways, multi-use paths, and a countywide trail network supported by the GP's Complete Streets policies in the Mobility Element. For program-level purposes, this transportation system remains as described in the certified EIR and GP. No change to the GP's adopted roadway classification framework or overall modal structure has occurred that would alter the certified EIR's baseline description (County of Los Angeles, 2015a and 2015c).

Since the certified EIR, the County has adopted transportation analysis and safety frameworks that refine methods and priorities. The Department of Public Works' Transportation Impact Analysis Guidelines (adopted July 23, 2020) implement CEQA Guidelines section 15064.3 and establish VMT-based thresholds, screening, and technical procedures for project-level review. Consistent with Senate Bill 743, the County now evaluates transportation impacts based on VMT using these guidelines. The Vision Zero Los Angeles County Action Plan (adopted August 4, 2020) establishes a policy emphasis on eliminating severe traffic injuries and fatalities. These adopted

frameworks standardize methodology and safety priorities and provide current policy context. They do not change GP land use designations or development intensity and they do not authorize capital projects. They do not modify the physical transportation system evaluated in the certified EIR (County of Los Angeles, 2020a and 2020b).

Incremental roadway, transit, and active transportation improvements have occurred since 2015 and may continue as agencies implement their programs. These improvements have been, and would be, processed within the General Plan framework through separate project-level approvals and environmental review, and they do not change the program-level service and capacity assumptions underlying the certified EIR (County of Los Angeles, 2015a and 2015c).

Accordingly, the baseline for this Addendum remains the multimodal transportation system and policy framework described in the certified EIR and GP. The VMT analysis procedures and Vision Zero framework provide current methodological and policy context for subsequent project-level evaluations (County of Los Angeles, 2015a; 2015c; 2020a; 2020b).

3.3.2. SUMMARY OF FINAL EIR IMPACT CONCLUSIONS

The certified EIR evaluated transportation and traffic at a program level using the significance criteria and methodologies in effect at that time. The analysis emphasized LOS-based operational analysis for roadway segments and intersections, freeway facilities under Caltrans jurisdiction, and related circulation topics such as safety, emergency access, and consistency with applicable plans and policies. The certified EIR also recognized the GP's multimodal framework, including Complete Streets policies, transit service improvements, bicycle and pedestrian network enhancements, transportation demand management, and goods-movement coordination.

The certified EIR concluded that these policies and programs would reduce transportation effects by improving multimodal options and by applying project-level procedures to identify and address site-specific circulation issues. Given regional travel patterns and long-term growth assumptions, some roadway facilities were projected to experience adverse LOS conditions under buildout and cumulative conditions, even after feasible policies and mitigation. The certified EIR therefore identified significant and unavoidable transportation impacts under long-range scenarios.

To address transportation effects, the certified EIR adopted a Mitigation Monitoring and Reporting Program. Measures include project-level traffic studies, implementation of applicable County and Caltrans standards, multimodal improvements where feasible, and transportation demand management strategies. These measures reduce effects but do not eliminate all long-range LOS exceedances. Transportation impacts under the certified EIR remain significant and unavoidable at the program level.

The certified EIR predates the implementation of Senate Bill 743 and CEQA Guidelines section 15064.3. Post-certification of the EIR, the County adopted VMT-based transportation impact procedures in the Department of Public Works Transportation Impact Analysis Guidelines (2020). This methodological update would not reopen or revise the certified EIR's LOS-based program-level conclusions. The guidelines govern how subsequent, project-level transportation analyses determine significance going forward under the GP.

3.3.3. CONSIDERATION OF CHANGES TO IMPACT CONCLUSIONS

This section evaluates whether the proposed text updates to the Mobility Element of the GP would introduce a new transportation impact or increase the severity of a transportation impact previously evaluated in the certified

EIR. The Project consists of administrative and technical corrections and policy alignments. It updates GP language to reflect County procedures implementing Senate Bill 743 and CEQA Guidelines section 15064.3, and it acknowledges the County's Vision Zero policy framework. It would not modify GP land use designations or development intensities. It would not change roadway functional classifications or network assumptions. It would not approve or fund capital improvements (County of Los Angeles, 2015a; 2015c; 2020a; 2020b).

Because the Project would not increase development potential or reclassify facilities, it would not increase traffic volumes or degrade operations beyond those evaluated in the certified EIR. The long-range adverse roadway operations conditions identified in the certified EIR result from regional travel patterns and long-term growth. This action would not change those conditions (County of Los Angeles, 2015c).

Aligning GP text with Senate Bill 743 and CEQA Guidelines section 15064.3, and with the County's Transportation Impact Analysis Guidelines, standardizes how subsequent project-level transportation significance is determined using vehicle miles traveled. This methodological update would not add physical capacity, increase vehicle travel, or generate environmental effects. Subsequent projects would apply the County's thresholds, screening, and technical procedures as part of project-level CEQA review (County of Los Angeles, 2020b; 2015c).

The Project would not alter policies governing emergency access or plan consistency. It would not approve specific transportation projects. Any future improvements would undergo separate approvals and environmental review consistent with GP policies and applicable standards (County of Los Angeles, 2015c; 2020a). The Project would not revise countywide growth forecasts or GP land use intensities. Accordingly, no new or more severe significant transportation impacts would occur relative to those identified in the certified EIR (County of Los Angeles, 2015c; 2020b).

3.3.4. SUMMARY OF FINDINGS

Based on the information presented for this Addendum, the proposed updates to the Mobility Element of the GP would not introduce a new significant transportation impact. The updates would not increase the severity of any transportation impact previously evaluated in the certified EIR (County of Los Angeles, 2015c). The action:

- Would not change GP land use designations, development intensities, or roadway functional classifications, and therefore would not increase traffic generation or degrade operations beyond what was evaluated at the program level in the certified EIR (County of Los Angeles, 2015a and 2015c);
- Aligns GP text with Senate Bill 743 and CEQA Guidelines section 15064.3 through the County's Transportation Impact Analysis Guidelines. This is a methodological update that governs how future projects determine significance using VMT and would not by itself add capacity, increase vehicle travel, or cause physical environmental effects (County of Los Angeles, 2020b);
- Would not approve, finance, or construct transportation improvements. Any future circulation or safety projects would be subject to separate discretionary approvals and project-level CEQA review, including application of current County procedures (County of Los Angeles, 2015c); and
- Would not revise countywide growth forecasts or GP assumptions that inform cumulative conditions (County of Los Angeles, 2015c).

Accordingly, the proposed GP edits would not introduce a new transportation impact, nor would they increase the severity of any transportation impact previously evaluated in the certified 2015 EIR. Preparation of an addendum is appropriate pursuant to CEQA Guidelines sections 15162 and 15164.



4

OTHER RESOURCES ANALYZED IN THE FINAL EIR

4. OTHER RESOURCES ANALYZED IN THE FINAL EIR

The following section provides a brief summary of the resources that are fully discussed in the certified EIR and whose analyses have been incorporated by reference in this EIR Addendum. References to the applicable certified EIR sections and the Mitigation Monitoring and Reporting Program are included throughout the following discussion. As discussed in Section 3, the Administrative and Technical Corrections category does not require additional environmental analysis because it implements previously approved actions and only reconciles GP content to those actions, with no change to land use designations, development intensity, mapped boundaries, mitigation requirements, thresholds, or analytical methods. As such, this section will address Policy Alignment edits only.

AESTHETICS

Section 5.1 of the certified EIR evaluated potential impacts to the visual appearance and character of the County, including potential degradation of visual character, scenic vistas, scenic highways, and light and glare, from implementation of the GP. This section discusses policies and County Code regulations pertaining to restrictions and development in Hillside Management Areas that would preserve the County's physical character and scenic value. The GP contains numerous implementation programs (i.e., Planning Areas Framework and Transit Oriented Districts Program), which serve to lessen potential impacts to the visual character of Los Angeles County that could result from future development accommodated by the GP. Certified EIR Section 5.1.4 concluded that with implementation of regulatory requirements already in place, all aesthetic impacts from full buildout of the planning area would be less than significant (County of Los Angeles, 2014b, 2015c).

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignments would alter the land use types, development projections, or regulatory requirements that apply to the aesthetics analysis. The Project would have no change to the certified EIR's conclusions regarding the degradation of visual character and potential impacts to scenic vistas, scenic highways, and light and glare. Current GP policies and County code regulations and standards would continue to apply to future projects, including development and improvement activities. The Project would not introduce a new aesthetic impact not already evaluated in the certified EIR Section 5.1, nor would it change the severity of the impacts analyzed for aesthetics.

AGRICULTURE AND FORESTRY RESOURCES

Section 5.2 of the certified EIR describes the impacts of the GP on existing farmland and forestry resources using thresholds of significance according to Appendix G of the CEQA Guidelines, which includes conversion of farmland to non-agriculture uses, Williamson Act lands conflicts, and rezoning or conversion of forest land. Certified EIR Section 5.2.4 concluded that the GP would not conflict with any existing zoning for agriculture use or William Act or forest land. Programs and regulations such as the Significant Ecological Area (SEA) program and Coastal Resource Area (CRA) designations under the California Coastal Act would serve to reduce any impacts to forest land to less than significant. Agricultural Resource Area (ARA) policies included in the GP would reduce direct and indirect impacts of conversion of mapped Important Farmland to non-agricultural uses; however, some conversion of Important Farmland to non-agricultural uses would be permitted. No mitigation measures were identified that would reduce these impacts to a less-than-significant level. As such, certified EIR Section 5.2 concluded that conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses

due to buildout of the planning area would be a potentially significant and unavoidable impact, specifically in the Antelope Valley Area Planning Area and Santa Monica Mountains Planning Area (County of Los Angeles, 2014b, 2015c).

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignments would convert the land use types, development projections, or regulatory requirements that apply to the agriculture and forestry analysis. The Project would have no change to the certified EIR's conclusions regarding farmland or forest land conversion to other uses, nor its conclusions on agricultural and forestry zoning or Williamson Act lands. Existing programs and regulations for ARAs, SEA, and CRAs would continue to apply to future projects and development. The Project would not introduce a new agriculture or forestry impact not already evaluated in certified EIR Section 5.2, nor would it change the severity of the impacts analyzed for agriculture and forestry resources (County of Los Angeles, 2014b, 2015c).

AIR QUALITY

Section 5.3 of the certified EIR evaluated air quality at a programmatic level for Countywide implementation of the GP and addressed consistency with applicable air quality management plans. The certified EIR concluded that, given the scale of Countywide buildout, construction and operational emissions would remain significant and unavoidable even with adopted mitigation and applicable plans and policies (County of Los Angeles, 2014b and 2015c).

The Project consists solely of Policy Alignments and Administrative & Technical Corrections. The Project would not change air quality policies or programs, land use assumptions, or the certified EIR's thresholds, methods, or mitigation. It would not alter the certified EIR's Air Quality conclusions. None of the policy alignments described in this Addendum pertain to air quality. Therefore, the Project would not result in new or more severe air quality impacts beyond those analyzed in the certified EIR. Programmatic mitigation and applicable plans and policies continue to apply to subsequent discretionary projects through project-level CEQA review.

No new significant air quality impact would occur, and no previously identified air quality impact would increase in severity as a result of the Project. Accordingly, the Project would not alter the conclusions of the certified EIR's air quality analysis.

BIOLOGICAL RESOURCES

Section 5.4 of the certified EIR evaluated biological resources at a programmatic and qualitative level within the GP planning area, including sensitive habitats, special-status species, jurisdictional waters and wetlands, wildlife movement, and compliance with adopted plans, policies, and ordinances protecting biological resources (County of Los Angeles, 2014b). The evaluation was based on prior technical reports completed in the County. Section 5.4.8 of the certified EIR identified regulatory requirements, standard conditions of approval, and mitigation measures, including lighting restrictions, focused surveys, and corridor width minimums to minimize biological impacts. The section concluded that even after mitigation, some impacts to special-status species and associated habitat would remain significant and unavoidable at the general plan level, and buildout of the Project would have a significant adverse effect on wildlife movement and nursery sites (County of Los Angeles, 2014b).

The proposed Policy Alignments would not authorize new disturbance within the planning area beyond that evaluated in the certified EIR. Future development considered within the planning area would continue to require subsequent project-by-project analysis to determine individual projects' impacts to biological resources,

significance, any project-specific mitigation, and any subsequent discretionary permits or coordination with resource agencies. As such, the Project would have no new significant impact to biological resources, and there would be no change in the severity of impacts from the discussion provided in the certified EIR (County of Los Angeles, 2014b, 2015c).

CULTURAL RESOURCES

Chapter 5.5 of the certified EIR evaluated potential impacts to archaeological, historical, and paleontological resources within the GP's planning area based on prior technical reports and County records. Section 5.5.4 of the certified EIR identified regulatory requirements, standard conditions of approval, and mitigation measures, including pre-grading activity requirements, and preparation of ordinances for historic preservation and Adaptive Reuse. The certified EIR concluded that mitigation measures and regulatory requirements would reduce potential impacts from buildout of the planning area. However, these measures would not prevent the demolition of a historic structure if preservation were determined to be infeasible, resulting in a significant and unavoidable impact.

The proposed Policy Alignments would not authorize new ground disturbance within the planning area beyond that evaluated in the certified EIR. The determination of feasibility of future development in the planning area associated with buildout of the Project would occur on a case-by-case basis and would require project-level analysis. Future development would remain subject to the adopted mitigation measures that address grading and excavation of a project site. Accordingly, the proposed modification would have no new significant impact on cultural resources, and there would be no change in the severity of impacts from the discussion provided in the certified EIR (County of Los Angeles, 2014b, 2015c).

GEOLOGY AND SOILS

Section 5.6 of the certified EIR evaluated geologic, seismic, and soil conditions for buildout of the GP planning area, including potential for strong seismic ground shaking, liquefaction and differential settlement, expansive soils, slope stability, erosion during grading, and long-term performance of engineered slopes and retaining systems. This section specifically focuses on aspects of the revised Conservation and Natural Resources Element that pertain to mineral resource development and hillside development, and aspects of the revised Safety Element that relate to seismic and geotechnical hazards. Section 5.6.3 of the certified EIR describes policies in the GP that are intended to reduce potentially significant adverse effects concerning geology or soils. This includes requirements for grading, management of Hillside Management Areas, construction restrictions, and adherence to County and State regulations (e.g., Surface Mining and Reclamation Act and Division of Oil, Gas, and Geothermal Resources). Section 5.6.4 of the certified EIR describes the grading plans and requirements for a comprehensive geotechnical investigation, plan review, construction monitoring, erosion and sediment control, and conformance with applicable building and grading codes. The certified EIR concluded that compliance with applicable regulatory requirements and conformance with standard conditions of approval would ensure that geotechnical impacts related to buildout of the GP would be less than significant (County of Los Angeles, 2014b, 2015c).

The Project would not modify the land use types or development projections in the County, nor would it change the mitigation measures, standard conditions, and engineering practices required for buildout of the planning area. The Project would have no change to the certified EIR's conclusions regarding impacts to geology and soils. Current GP policies and County code regulations and standards would continue to apply to future projects, including future development associated with buildout of the planning area. The Project would not introduce a new impact not already evaluated in Section 5.6 of the certified EIR, nor would it change the severity of the impacts analyzed for geology and soils.

GREENHOUSE GAS EMISSIONS

Section 5.7 of the certified EIR evaluated the potential for implementation of the GP and associated actions to cumulatively contribute to greenhouse gas (GHG) emissions impacts. The air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG emissions impacts are likely to occur in conjunction with future development that would be accommodated by the GP. The certified EIR analysis included adopted and proposed plans necessary to achieve GHG reduction targets, including the California Air Resources Board Scoping Plan and a Community Climate Action Plan. With the addition of these plans, mitigation, and GP policies, certified EIR Section 5.7.9 concluded that GHG impacts would remain significant and unavoidable (County of Los Angeles, 2014b and 2015c).

None of the proposed Policy Alignments would alter the land use types, development projections, or regulatory requirements that apply to the GHG analysis. The Project would have no change to the certified EIR's conclusions, and there would be no new impact or change in severity of impacts from the emissions discussion provided in certified EIR Section 5.7.4.

HAZARDS & HAZARDOUS MATERIALS

Section 5.8 of the certified EIR evaluates the potential impacts that could result from implementation of the GP related to hazardous materials, airport hazards, emergency response plans, and wildland fires. This section discusses GP policies (e.g., from the Land Use and Safety elements) in addition to federal, State, and County regulations that would address potential hazards from the buildout of the planning area. These include, but are not limited to, Comprehensive Environmental Response, Compensation, and Liability Act, which regulates closed and abandoned hazardous waste sites; Preliminary Remediation Goals, which establishes tools for evaluating and cleaning up contaminated sites; Cortese List, which provides information about the location of hazardous materials release sites; California Human Health Screening Levels, which evaluates sites with potential human health concerns; GP policies in the Safety and Land Use Elements; and Federal Aviation Administration regulations. These policies and regulations act to protect the public and would ensure prevention or reduction of hazards to a less than significant impacts (County of Los Angeles, 2014b, 2015c).

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignments would alter the land use types, development projections, or regulatory requirements that apply to the hazards and hazardous materials analysis. The Project would have no change to the certified EIR's conclusions regarding hazardous materials, airport hazards, emergency response plans, and wildland fires. Current GP policies, and federal, State and County regulations and standards would continue to apply to future projects. The Project would not introduce a new hazards and hazardous materials impact not already evaluated in Section 5.8.4 of the certified EIR, nor would it change the severity of the impacts analyzed for hazards and hazardous materials (County of Los Angeles, 2014b, 2015c).

HYDROLOGY AND WATER QUALITY

Section 5.9 of the certified EIR evaluated potential impacts to hydrology and water-quality conditions in the planning area from implementation of the GP (County of Los Angeles, 2014b). This includes a discussion of water quality standards and waste discharge, groundwater recharge, drainage patterns, and flooding. Applicable plans and programs relevant to the Project that are already in place are discussed in certified EIR Section 5.9.1.1, and GP goals and policies relevant to hydrology and water quality are discussed in the Safety and Conservation and Natural Resources Elements of the GP. The certified EIR concluded that hydrology and water quality impacts would be less

than significant with implementation of existing federal, State, and County regulations and policies (County of Los Angeles, 2015c).

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignments would alter the land use types, development projections, or regulatory requirements that apply to the hydrology and water quality analysis, nor would they alter any regulations and policies required for buildout of the Project. The certified EIR concluded that the existing regulatory programs would reduce any potential impacts to hydrology and water quality to a level that is less than significant. All previous regulatory programs would continue to apply to buildout of the Project. Accordingly, the Project would have no new impact to hydrology and water quality, and there would be no change in the severity of impacts from the conclusions in the certified EIR (County of Los Angeles, 2015c).

MINERAL RESOURCES

Section 5.11 of the certified EIR evaluates potential impacts to mineral resources in the planning area from implementation of the GP. The certified EIR discussion includes potential loss of availability of known mineral resources and oil and natural gas reserves in the County. The certified EIR concluded that buildout of the GP would have significant and unavoidable impacts due to loss of availability of known mineral resources within the Antelope Valley Planning Area, as well as a substantial loss of availability of mineral resources in one extraction area identified in the Antelope Valley's Little Rock Wash area (County of Los Angeles, 2014b, 2015c). Certified EIR Section 5.11.4 concluded that no mitigation would be feasible to reduce these impacts to a less-than-significant level.

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignment would alter the land use types, development projections, or regulatory requirements that apply to the Mineral Resources analysis. The Project would have no change to the certified EIR's conclusions, and there would be no new impact or change in severity of impacts from the Mineral Resources discussion provided in certified EIR Section 5.11.5 (County of Los Angeles, 2014b and 2015c).

NOISE AND VIBRATION

Section 5.12 of the certified EIR discusses the fundamentals of sound; examines federal, State, and local noise guidelines, policies, and standards; reviews noise levels at existing receptor locations; evaluates potential noise impacts associated with the GP; and provides mitigation to reduce noise impacts at noise-sensitive receptors. This evaluation uses procedures and methodologies as specified by Caltrans and the Federal Highway Administration (FHWA). Certified EIR Section 5.12.7 includes mitigation measures to reduce impacts to noise-sensitive receptors from construction activities, increased ambient noise due to traffic, new noise-sensitive land uses associated with GP implementation, and vibration impacts related to construction (County of Los Angeles, 2014b). While mitigation would lessen impacts, certified EIR Section 5.12.4 concluded that noise impacts would remain significant and unavoidable after mitigation (County of Los Angeles, 2014b and 2015c).

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignment would alter the land use types, development projections, or regulatory requirements and mitigation that apply to the Noise and Vibration analysis. The Project would have no change to the certified EIR's conclusions, and there would be no new impact or change in severity of impacts from the Noise and Vibration discussion provided in certified EIR Section 5.11.5 (County of Los Angeles, 2014b and 2015c).

POPULATION AND HOUSING

Section 5.13 of the certified EIR evaluated the GP's potential to induce population growth, displace housing or people, and conflict with adopted regional growth forecasts. Certified EIR Sections 5.13.4 and Section 3.3.2 concluded that future development would occur consistent with the Housing Element, which is designed to accommodate anticipated future growth with no displacement of existing housing (County of Los Angeles, 2014b and 2015c).

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignment would alter the land use types, development projections, or regulatory requirements that apply to the Population and Housing analysis. These alignments are not associated with displacement of housing or induced growth, and would continue to align with the County's anticipated growth projections. Accordingly, the proposed modification would have no new significant impact to population and housing, and there would be no change in the severity of impacts from the conclusion provided in the certified EIR (County of Los Angeles, 2015c).

PUBLIC SERVICES

Section 5.14 of the draft EIR evaluated demands on public services and facilities for implementation of the GP, including fire protection and emergency services, law enforcement, school services, and library services (County of Los Angeles, 2014b). The certified EIR concluded that existing regulatory programs and mitigation measures identified in the certified EIR, including compliance with Los Angeles County Fire Department Fire Code requirements, would reduce potential impacts associated with fire protection to a level that is less than significant. Upon implementation of regulatory requirements and standard conditions of approval, there were no significant impacts to public services associated with implementation of the GP.

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignment would alter the land use types, development projections, or regulatory requirements that apply to the Public Services analysis, nor would they change the mitigation measures and standard conditions specific to fire protection, law enforcement, school services, and library services required for buildout of the Project. Current GP policies and County code regulations and standards would continue to apply to future projects, including development and improvement activities. Accordingly, the Project would have no new significant impact to public services and facilities, and there would be no change in the severity of impacts from the conclusions in the certified EIR (County of Los Angeles, 2014b and 2015c).

UTILITIES AND SERVICE SYSTEMS

Section 5.17 of the certified EIR evaluated the potential for implementation of the GP to impact utilities and service systems. The certified EIR analysis examined effects on wastewater treatment and collection, water supply and distribution systems, storm drainage systems, solid waste, electricity, natural gas, and communication systems. The certified EIR concluded that water supply and delivery systems would not be adequate to meet water demands associated with GP implementation in the Antelope Valley and Santa Clarita Valley Planning Areas beyond 2035. With mitigation incorporated, this would remain a significant and unavoidable effect. For all other effects related to Utilities and Services Systems, implementation of the GP policies (i.e., in the Public Services and Facilities Element and GP implementation programs), and current required regulations would mitigate potential impacts to a less than significant level (County of Los Angeles, 2014b and 2015c).

The Policy Alignments proposed as part of the Project are specific to the Mobility, Parks and Recreation, and Economic Development Elements of the GP. None of the proposed Policy Alignment would alter the land use types, development projections, or regulatory requirements that apply to the Utilities and Service Systems analysis. The Project would have no change to the certified EIR's conclusions, and there would be no new impact or change in severity of impacts from the Utilities and Service Systems discussion provided in the certified EIR (County of Los Angeles, 2014b and 2015c).

OTHER CEQA TOPICS

Since the 2015 certification of the certified EIR, there have been updates to the CEQA Guidelines that address additional topics such as energy, tribal cultural resources, and wildfire. The following is a summary of these topics and a discussion of how the proposed Policy Alignments would not trigger a new significant impact that was not addressed in the certified EIR.

- **Energy.** The requirement to evaluate a project's energy implications was added to CEQA Guidelines Appendix F (Energy Conservation) in 2009 and incorporated into CEQA Guidelines Appendix G (Environmental Checklist Form) in 2018. Prior to 2018, an EIR's discussion of energy resource impacts was typically included in an analysis of the project's irretrievable commitment of resources. The certified EIR Chapter 5 (Section 5.11, Minerals) includes discussion on goals and policies related to renewable and non-renewable energy resources. EIR Chapter 9 describes the commitment of nonrenewable and/or slowly renewable energy resources (e.g., gasoline, diesel fuel, electricity; human resources; and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, and water that would be required to fully develop the GP. As the Policy Alignments proposed as part of the Project would not change the approved land use types or planned development under the GP, there would be no new impact or change in the severity of energy resource impacts from the conclusions in the certified EIR.
- **Tribal Cultural Resources.** A CEQA requirement to evaluate impacts to Tribal Cultural Resources was incorporated into the CEQA Guidelines in 2016. Chapter 5, Section 5.5.1 of the certified EIR includes discussion of tribal cultural resource sites, including Native American sacred and burial sites, as part of the archaeological resources analysis. As discussed under the Cultural Resources subsection above, the proposed Policy Alignments would not authorize new ground disturbance within the planning area beyond that evaluated in the certified EIR. Future development would be approved on a case-by-case basis, and would remain subject to the certified EIR's adopted mitigation measures that address grading and excavation of a project site. Accordingly, the proposed modification would have no new significant impact on cultural resources, including Tribal Cultural Resources, and there would be no change in the severity of impacts from the discussion provided in the certified EIR.
- **Wildfire.** The evaluation of wildfire-specific risk was added to the CEQA Guidelines in 2018. The certified EIR addressed wildfire risks under the Hazards and Hazardous Materials section (Section 5.8.1.7). The certified EIR concluded that implementation of GP policies would not result in a significant wildfire risk. Current GP policies and County code regulations and standards would continue to apply to future projects, including development and improvement activities. As the Project's proposed Policy Alignments would not change the approved land use types or planned development under the GP, there would be no new impact or change in the severity of wildfire impacts from the conclusions in the certified EIR.



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SUMMARY AND CONCLUSION

5. SUMMARY AND CONCLUSION

The proposed GP Tune-Up Series 001 Project is a targeted set of Administrative & Technical Corrections and Policy Alignments to the adopted 2015 GP (see Table 2-1 and Table 2-2; see also Section 2.1.1, GP Modifications Overview). These edits are limited in scope; maintain the GP's fundamental framework and policy structure; do not alter land use designations, zoning overlays, development intensities/densities, mapped boundaries, mitigation requirements, thresholds, or analytical methods; and do not approve site-specific development. Consistent with CEQA Guidelines §15164, the Addendum provides substantial evidence that none of the §15162 triggers for a subsequent or supplemental EIR are present.

Addendum Section 3.1 (Land Use and Related Planning) explained that the Project would update the GP's Economic Development Element narrative to reflect the Life Sciences sector terminology in lieu of the narrower Biomedical label. This narrative alignment is non-regulatory and does not modify the GP Land Use Map, community/area plan designations, overlays, allowable densities/Floor Area Ratios, or other land use controls; it also does not revise countywide growth forecasts or authorize site-specific development. Accordingly, the update would not introduce a new significant land use impact nor increase the severity of any land use impact previously evaluated at the program level in the certified EIR.

Addendum Section 3.2 (Recreation) explained that the Project would align GP policy references to County frameworks adopted since 2015, including integration of the PNA and PNA+, recognition of the Measure A/RPOSD funding framework, and establishment of a "Urban Natureways" park classification within the Parks and Recreation Element. These are informational/policy-alignment edits that do not change service standards, parkland dedication requirements, land use designations, or growth projections, and they do not approve or fund specific capital projects. Therefore, the edits would not introduce a new significant recreation impact nor increase the severity of previously evaluated recreation impacts.

Addendum Section 3.3 (Transportation and Traffic) explained that the Project would update text in the GP's Mobility Element to align with Senate Bill 743 and CEQA Guidelines §15064.3. The updated text would reference the County's Transportation Impact Analysis Guidelines (2020) (VMT-based significance) and acknowledge the Vision Zero policy framework. These are methodological policy alignments that would not modify land use intensities, roadway functional classifications, or network assumptions and would not approve transportation projects. As such, they would not increase traffic generation or degrade operations beyond the program-level conditions disclosed in the certified EIR. Where the certified EIR identified significant and unavoidable transportation impacts under long-range scenarios, those conclusions remain unchanged.

As described in Addendum Chapter 4, the Project would not alter adopted assumptions, methods, thresholds, or mitigation in a manner that would change the certified EIR's conclusions for all other resource topics addressed in the certified EIR (e.g., Aesthetics; Agriculture and Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Geology and Soils; Greenhouse Gas Emissions; Hazards & Hazardous Materials; Hydrology and Water Quality; Mineral Resources; Noise and Vibration; Population and Housing; Public Services; Utilities and Service Systems; and CEQA updates for Energy, Tribal Cultural Resources, and Wildfire). Where the certified EIR disclosed significant and unavoidable effects (e.g., certain long-range transportation, air quality, greenhouse gas, noise, mineral resources, agricultural conversion, and specific water-supply conditions), those determinations remain unchanged by the Project. The Project would not introduce a new significant impact beyond what was presented in the certified EIR, nor require the development of new mitigation measures.

Based on the information presented in Chapter 3 and the topic summaries in Chapter 4, and on the administrative nature of Table 2-1 edits and the limited scope of Table 2-2 policy alignments, the record demonstrates that the Project would not:

- Involve substantial changes requiring major revisions of the certified EIR due to new significant environmental effects or a substantial increase in the severity of previously identified effects (§15162(a)(1));
- Involve substantial changes in circumstances requiring such revisions (§15162(a)(2)); or
- Present new information of substantial importance revealing new significant effects or feasible mitigation alternatives declined by the project proponent (§15162(a)(3)).

The County has determined that an addendum to the certified EIR is the appropriate CEQA document for the GP Tune-Up Series 001 Project. As demonstrated in this Addendum, the GP Tune-Up Series 001 Project maintains the fundamental framework, development intensity, and timing established in the GP, while ensuring the GP remains accurate, legally compliant, and responsive to current planning standards.



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REFERENCES

6. REFERENCES

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