2.10 FIRE/EMERGENCY MEDICAL SERVICES

2.10.1 Introduction

The Fire/Emergency Medical Services section of this document has been analyzed by Community Plan Area (CPA). Los Angeles Fire Department (LAFD) station facilities are located in each CPA of the City. This level of analysis is appropriate because LAFD facilities are located within each CPA and can be analyzed comparing land uses within the CPA to the LAFD service availability of the area. This section also attempts to show the relation of high fire risk areas and Targeted Growth Areas in terms of impact assessment. The baseline data was gathered through the LAFD, the City of Los Angeles Fire Protection and Prevention Plan Element contained in the General Plan (January 16,1979), the City of Los Angeles Planning Department, AB939 Land Use Database (September, 1993), and the SCAG Aerial Photo Interpretation Land Use Survey (September, 1993).

2.10.2 Thresholds of Significance

Implementation of the City of Los Angeles General Plan Framework would result in a significant impact relative to fire/emergency medical services if it results in one or more of the following:

- If the Plan results in a substantial change in land use (equivalent to the introduction or designation of a Targeted Growth Area) in areas inadequately served currently by LAFD services based upon current General Plan planning standards; or
- If the Plan proposes a substantial change in land use (equivalent to the introduction or designation of a Targeted Growth Area) in Community Plan Areas that contain areas deemed as high fire risk locations.

2.10.3 Existing Conditions

Fire prevention, fire protection, and emergency medical service (EMS) for the City is provided by the LAFD. The LAFD is responsible for fire suppression, design consultation, inspection, planning and review, in addition to certain medical emergencies. In the fiscal year 1990, the LAFD responded to 327,909 emergency calls within the City consisting of 84,276 non-EMS calls and 243,633 EMS calls.

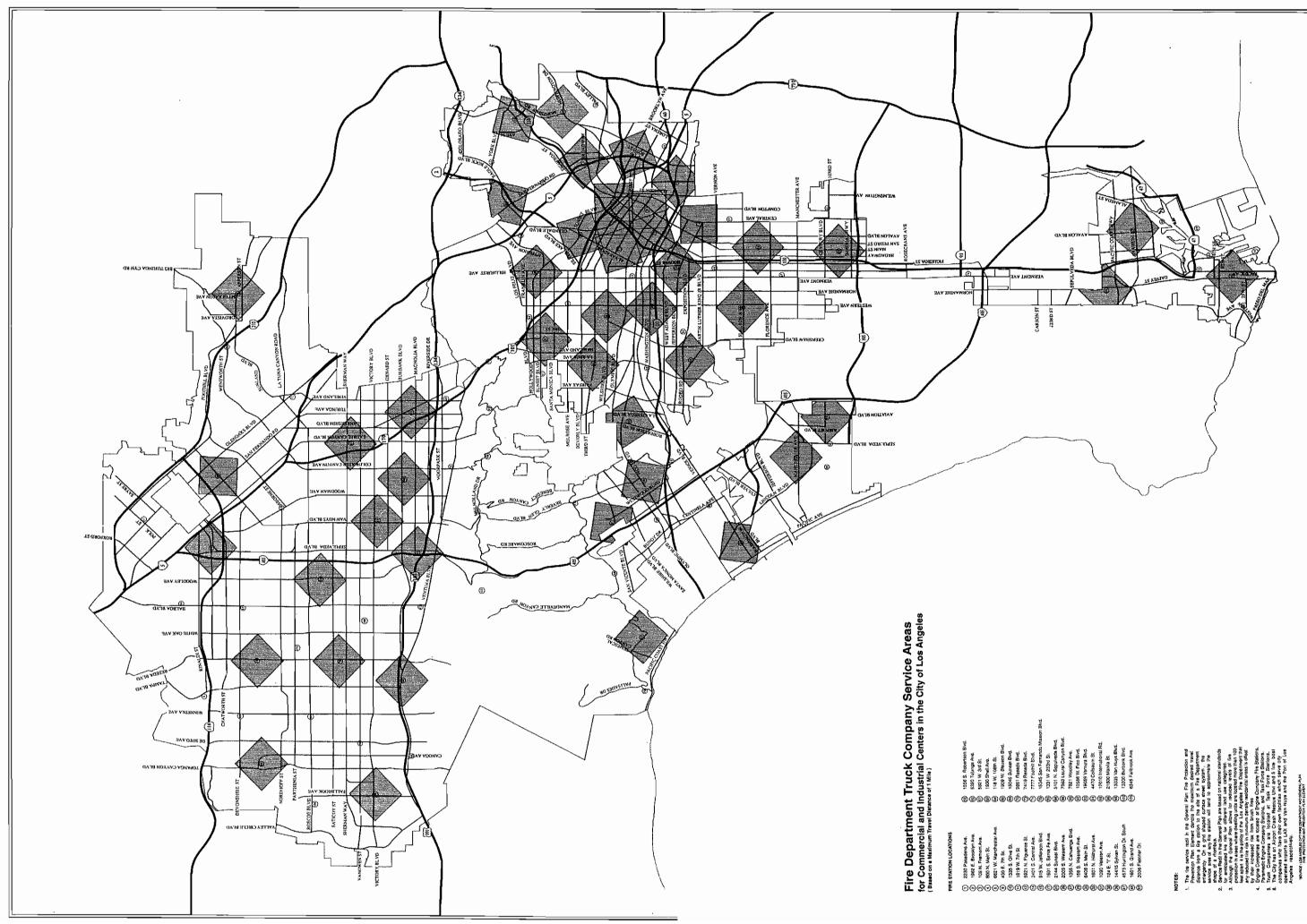
The City of Los Angeles Fire Protection and Prevention Plan, adopted by the City Council on January 16, 1979, is an element of the General Plan of the City of Los Angeles. The Fire Protection and Prevention Plan specifies policy and established standards for the distribution, design, construction, and location of fire protection facilities including systems incorporated into private developments in order to safeguard life, property, and the environment. Changes in the use of land to accommodate population increases do not necessarily mean that the number of fire protection facilities must be increased to insure adequate protection. However, it may be necessary to expand or relocate existing facilities as land patterns change. Therefore, the Fire Protection and Prevention Plan designates general rather than precise locations for the fire protection facilities involved.

The Fire Protection and Prevention Plan standards specify fire flow criteria, minimum distances to fire stations, public and private fire hydrant specifications and location criteria, and access provisions for fire fighting vehicles and personnel. Services not addressed in the Fire Protection and Prevention Plan are assumed to be adequate, such as EMS units, Port of LA units, and units at both LAX and Van Nuys Airports.

Location of Engine and Truck Company Fire Stations are illustrated on **Figures F-1** through **F-6**. These figures also illustrate the maximum desired travel distance of Fire Station Companies from the station to a Fire Department emergency. As denoted in the existing General Plan Fire Prevention and Protection Plan Element, the maximum desired travel distance varies and is dependent on the type of Fire Department Company responding and the type of land use affected. Maximum desired travel distance serves to illustrate the desired range of travel to LAFD emergencies; however, if the magnitude of an emergency is beyond the service availability of any one Company, other companies in close proximity could respond for added service availability.

Fire flow is defined as the quantity of water available or needed for fire protection in a given area and normally measured both in gallons per minute (gpm) and duration of flow. Required fire flow is defined as the rate of water flow measured in gpm and duration needed for fire-fighting purposes to confine a major fire to the buildings within a block or other group complex. The determination of this flow depends upon the size, construction, occupancy, and exposure of buildings within and surrounding the block or group complex. **Table F-1** lists required fire flow by type of land use.

Fire flow is also affected by the type of water distribution system available to any area of the City. Areas of the City served by a gravity distribution are typically lowland, non-hillside areas. Hillside or elevated level areas of the City are typically served by a pump/tank system. This system provides water pressure and volume by way of elevated water tanks that provide water supply during peak usage periods and are replenished in off-peak usage periods by pumps. As a result, areas of the City that are serviced by these types of water distribution systems are considered high fire risk. **Figure F-7** indicates areas of inadequate fire hydrant service in the City as well as areas where structures are more than 300 feet from a fire hydrant. These areas of inadequate fire hydrant service are highlighted on the figure as high fire risk areas. Problems associated with inadequate fire hydrant service are compounded by elevated slope gradients and areas that contain native shrub habitats, consisting of either or both coastal sage scrub and chaparral.





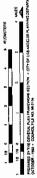
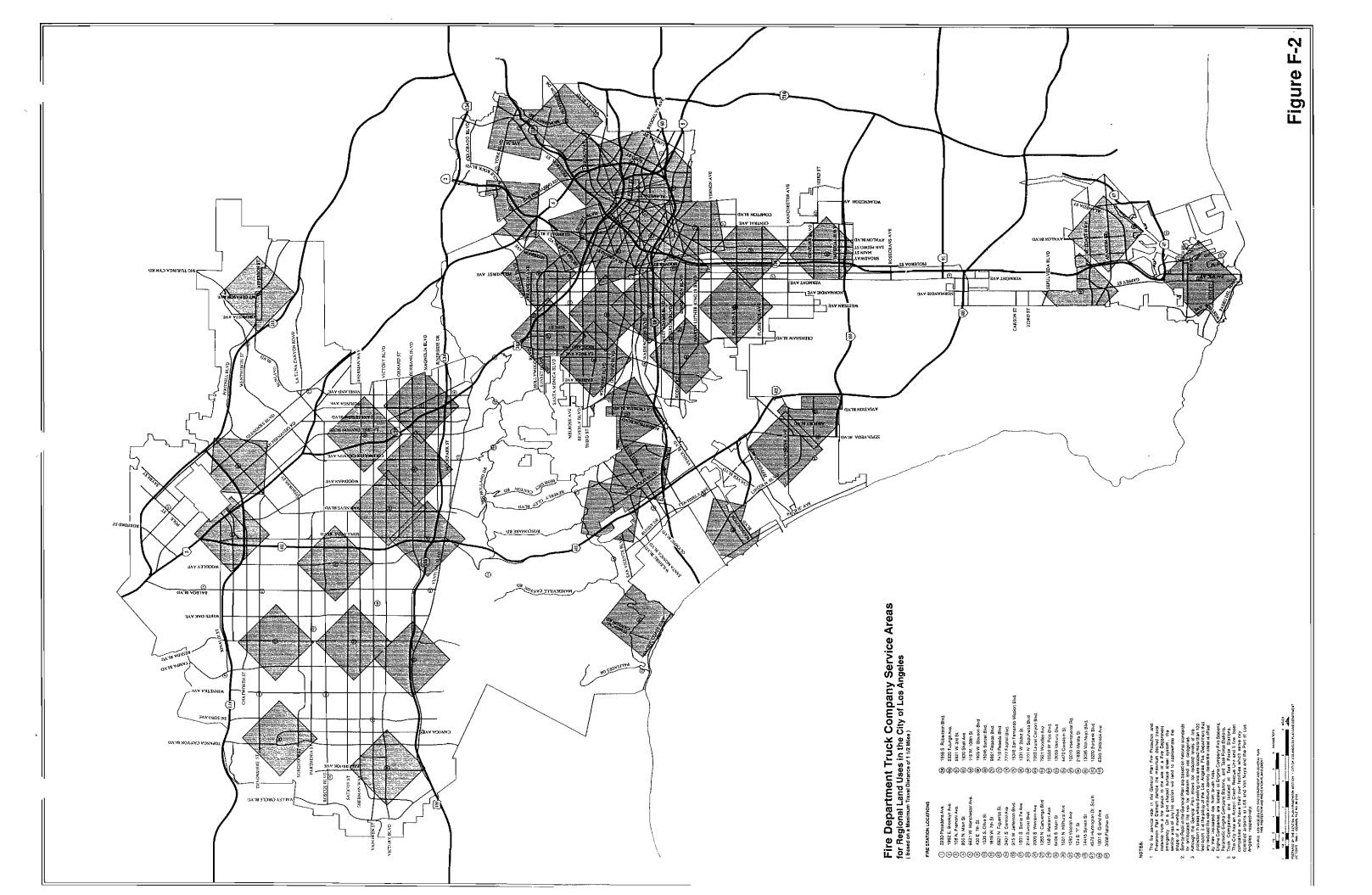


Figure F-1





CITYWIDE GENERAL PLAN FRAMEWORK AN ELEMENT OF THE GENERAL PLAN OF THE CITY OF LOS ANGELES FINAL ENVIRONMENTAL IMPACT REPORT

REVISED FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS

LOS ANGELES, CALIFORNIA July 17, 2001

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I. <u>INTRODUCTION</u>

A. <u>PROJECT DESCRIPTION</u>

The Citywide General Plan Framework is a proposed new Element of the City of Los Angeles General Plan, consisting of goals, objectives, policies, and programs designed to improve the quality of life and economic wellbeing of the City's residents. The Framework Element also contains a Long Range Land Use Diagram that will be implemented through updates to the City's community plans. The Framework Element will supersede *Concept Los Angeles* and the *Citywide Plan*, the two planning documents that have defined the City's long-range growth and development policy since 1974.

The Framework Element does not override or mandate changes to community plans or any specific plan. The Framework Element includes generalized policies and recommendations that will be used to guide the process of updating community plans and other General Plan elements.

The central objectives of the Framework Element include the following: (1) improve air quality; (2) mitigate traffic impacts of additional growth; (3) improve the City's distribution of land uses and its urban form pattern to protect the character of low-density residential neighborhoods; (4) encourage quality development, pedestrian activity, and transit use; (5) revitalize and improve strip commercial development with mixed use commercial and residential development; (6) improve the City's employment base, especially in economically disinvested neighborhoods; and (7) assess the status of supporting infrastructure and public services relative to growth and development activity.

The Framework Element is based on demographic forecasts prepared by the Southern California Association of Governments (SCAG), which suggest that the City's population could increase from a 1990 U.S. Census enumeration of 3,485,399 residents to 4,306,500 residents by the year 2010, and that the supply of housing could increase from 1,299,963 to 1,566,000 dwelling units.

Demographic forecasts are estimates about the future and are subject to change. Because forecasting methods are not an exact science, it is possible that growth as projected may not occur. Nevertheless, the Framework Element accepts SCAG's population and housing forecasts as a basis for policy because, at the time the plan was developed, these forecasts were the most accurate demographic projections available.

It should be emphasized that the City is not advocating that this projected growth occur. Rather, the City has prepared the Framework Element as the best way to accommodate growth when and if it takes place.

In addition to population and housing forecasts, SCAG also prepared an employment forecast which estimates that the job base in Los Angeles could increase from a 1990 base year level of 1,902,067 jobs to 2,112,500 jobs by the year 2010. This amount of growth will not keep pace with projected population and housing increases, and could, therefore, negatively impact the City's unemployment rate, quality of life, and ability to provide public services.

As such, the Framework Element does not utilize SCAG's employment forecast as a basis for policy. Instead, the Framework Element seeks to mitigate the adverse impacts of lower employment through a comprehensive array of

economic development objectives, policies, and programs. The goal of these measures is to generate 179,000 more jobs by the year 2010 than forecast by SCAG, resulting in an employment base of 2,291,500 jobs and a maintenance of the City's 1990 ratio of jobs to housing.

The Framework Element includes an on-going monitoring program to update the demographic forecasts that underpin the plan and its Environmental Impact Report (EIR). The monitoring system will result in the issuance of an Annual Report on Growth and Infrastructure which will be used to modify plan and EIR assumptions and serve as the basis for evaluating the effectiveness of the Framework Element's objectives, policies, programs, and mitigation measures.

The Department of City Planning, as Lead Agency for the Framework Element, oversaw the preparation of a Program Environmental Impact Report (EIR). The EIR assumes that SCAG's population and housing estimates will occur as forecast and that the Framework Element's economic development goal will also be attained. If these forecasts do not occur as projected and the economic development goal is not accomplished then the impacts reported in the EIR could be either greater or lesser, depending on whether more or less growth actually occurs.

B. <u>ADMINISTRATIVE HISTORY</u>

1. Pre-Draft Request for Comments

On July 13, 1994 the Department of City Planning issued a Pre-Draft Request for Comments concerning the scope and content of the Framework Element EIR. The Request for Comments also contained the results of an Initial Study, which determined that the probable environmental effects of the Framework Element required the preparation of an EIR.

2. Public Review Period

On January 26, 1995 the Department of City Planning released the Draft Framework Element and its accompanying Draft EIR for public review and comment through April 26, 1995. To accommodate the requests of a number of public reviewers, the Department of City Planning extended the comment period through May 26, 1995. The Transportation Improvement and Mitigation Program (TIMP), an implementation program of the General Plan Framework Element, was available for public review from February 13, 1995 through May 26, 1995.

3. Public Hearings

On February 28, March 8, March 14, March 15, March 18, March 21, and March 25, 1995, the Department of City Planning conducted seven public hearings/workshops concerning the Draft EIR and the Framework Element.

4. Final EIR

On June 7, 1996 the Department of City Planning released the Final EIR for the Framework Element, which was originally certified by the City Council of Los Angeles on December 11, 1996.

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The TIMP document, modified as adopted by the City Council on December 11, 1996, was rereleased for public comment and review on November 19, 1998 accompanied by an explanatory cover letter. The initial public review and comment period of sixty days was extended to accommodate the requests of some public reviewers through to February 5, 1999.

C. <u>RELATED DOCUMENTS</u>

The following related documents are referenced in this statement of Findings and Overriding Considerations:

- 1. SCAG Regional Comprehensive Plan
- 2. SCAG Regional Comprehensive Plan Environmental Impact Report
- 3. SCAQMD Regional Air Quality Management Plan
- 4. SCAG Regional Mobility Plan and Regional Transportation Plan
- 5. Air Quality Element of the City of Los Angeles General Plan
- 6. Clean Air Program of the City of Los Angeles
- 7. Housing Element of the City of Los Angeles General Plan
- 8. Solid Waste Management Plan of the City of Los Angeles
- 9. Wastewater Facilities Plan Update of the City of Los Angeles
- 10. Urban Water Management Plan of the Department of Water and Power
- 11. Congestion Management Program of the Los Angeles County Metropolitan Transportation Authority
- 12. Long Range Transportation Plan for Los Angeles County (LACMTA)
- 13. Seismic Safety Plan (1971) of the City of Los Angeles General Plan
- 14. Transportation Element of the City of Los Angeles General Plan

These documents are a part of the Framework Element Final EIR Administrative Record and are available for public review and inspection at the following location:

Los Angeles Department of City Planning Citywide Planning Division 221 South Figueroa Street, Second Floor Los Angeles, California 90012

II. PRIOR <u>RECERTIFICATION</u>

The Council of the City of Los Angeles on September 8, 1999 certified that:

- A. The Final EIR for the Framework Element, including Vol. III Response to Comments on the TIMP, had been completed in compliance with the California Environmental Quality Act (CEQA); and that
- B. The Final EIR, including the recirculated TIMP, the 11/18/98 TIMP cover letter, and Vol. III Response to Comments on the TIMP, were presented to the City Council and the City Council reviewed and considered the information contained in the aforementioned documents prior to adopting the Transportation Element of the General Plan; and that
- C. The Final EIR, including Vol. III Response to Comments on the TIMP, reflects the independent judgment of the City Council.

III. IMPACTS WHICH WERE INSIGNIFICANT WITHOUT MITIGATION -- CLASS III

The Council of the City of Los Angeles finds that the Framework Element has no potential for significant adverse impact on the following areas of the environment, and that there is no need for the formulation of mitigation measures (*Class III impacts as identified in the Final EIR*):

- Fire/Emergency Medical Services
- Schools
- Libraries
- Cultural Resources
- Public Health
- Noise
- Risk of Upset

IV. POTENTIALLY SIGNIFICANT ADVERSE IMPACTS PRIOR TO MITIGATION -- CLASS II

A. FINDING ON POTENTIALLY SIGNIFICANT ADVERSE IMPACTS

The Council of the City of Los Angeles finds that although the Final EIR indicated that there are potentially significant adverse environmental impacts, changes or alterations have been required in or incorporated into

the Framework Element which mitigate or avoid the potentially significant effects on the environment with respect to the following environmental issues (*Class II impacts as identified in the Final EIR*):

- Housing/Population
- Solid Waste
- Wastewater
- Water Resources
- Utilities
- Flood Control/Drainage
- Police
- Recreation and Open Space
- Geologic/Seismic Conditions

These potentially significant environmental impacts and mitigation measures are described in parts "D" through "L" below.

- The Council of the City of Los Angeles also finds that such changes or alterations which directly reduce mobile source emissions are within the responsibility and jurisdiction of the South Coast Air Quality Management District, and not the City of Los Angeles, with respect to the following environmental issue:
- Air Quality--ROG, NOx, and SOx Emissions

Such changes or alterations have been adopted by the South Coast Air Quality Management District (SCAQMD). The potentially significant air quality--ROG, NOx, and SOx emissions impacts and mitigation measures are described in part "B" below.

B. <u>AIR QUALITY--ROG, NOx, AND SOx EMISSIONS</u>

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy and growth in the surrounding region could result in 812 tons per day of air quality emissions (ROG, NOx, and SOx). The impacts result from increased vehicle miles traveled (VMT).

These impacts are potentially significant.

2. Mitigation Measures

Potential air quality-emissions impacts (ROG, NOx, and SOx) will be significantly reduced through an integrated set of land use and transportation policy and program measures that are consistent with and further the objectives of the SCAQMD Air Quality Management Plan, the Regional Transportation Plan, the City of Los Angeles General

Plan Air Quality Element, and the City of Los Angeles Clean Air Program. The programs and policies achieve the required mitigation by providing the means for a significant change in travel behavior from high polluting singleoccupancy automobile use to less polluting or non-polluting travel modes such as ridesharing, transit, walking, and bicycle use.

The land use measures encourage new development to locate in centers, districts, and mixed use boulevards that will be served by rail transit or high frequency bus transit. The policies also encourage walking through incentives for mixed-use residential and commercial development, especially along the City's commercial strip boulevards. Development standards for community plan designated transit-priority and pedestrian-priority street segments encourage the creation of environments that facilitate and encourage walking over single-occupancy automobile use.

The transportation measures, including a citywide Transportation Improvement and Mitigation Program (TIMP), are consistent with and further the objectives of the Los Angeles County Congestion Management Program. The policies and programs include transit and high occupancy vehicle lane (HOV) capital improvements, smart shuttle transit, park and ride and intermodal facilities, urban bicycle and pedestrian facilities, rideshare matching and information services, telecommuting facilities and satellite work centers, transit pass centers, and corridor-based vanpool programs. These policies serve to discourage single-occupancy automobile use and to encourage ridesharing, bus and rail transit use, walking, and bicycle use.

The integrated land use and transportation measures promulgated in the Framework Element and the TIMP will contribute to a reduction in year 2010 air emissions (ROG, NOx, and SOx) by 13% to 705 tons per day, even though the Framework Element assumes a higher level of employment for the year 2010 than forecast by SCAG.

In addition to the Framework Element, other mitigation measures recommended by the Final EIR include:

- Ensure that all City Streets have a curb lane wide enough to accommodate bicycle traffic; and
- Require that all new developments install in all garages electric plugs that can recharge electric vehicles.

Pursuant to Section 21081 of the Public Resources Code, the City finds the first mitigation measure to be physically and economically infeasible without extensive condemnation of private property or purchase of right-of-way. A built-out city cannot ensure that all the streets will be rebuilt with the required width for bicycle routes. Also, there are streets where any kind of bicycling would be unsafe. Therefore, the City will not adopt this mitigation measure and will adopt a substitute measure as follows: "Ensure that all City streets designated in the Bicycle Plan as bicycle routes have a curb lane wide enough to accommodate bicycle traffic."

In addition, the City finds that the second mitigation is infeasible in that it represents too large a cost to the development and construction industry in a depressed economic market. Therefore the City will not adopt this second mitigation measure, but will adopt a substitute measure as follows: "As part of the update of the Conservation Element of the General Plan, the City will investigate the cost and feasibility of requiring that new development install in garages electric plugs that can recharge electric vehicles, where feasible."

3. Significance

Imposition of these mitigation measures and/or alterations will avoid or substantially lessen these potentially significant effects. The primary mitigation is achieved through the measures imposed by SCAQMD through the adopted Air Quality Management Plan. General Plan Framework policies, and the TIMP, also serve as air quality mitigation. If, however, the City is unable to fully implement the TIMP, potentially significant unmitigated air quality impacts (ROG, NOx and SOx) could result from the projected growth accommodated by the General Plan Framework.

- The Council of the City of Los Angeles further finds that although the Final EIR indicated that there are potentially significant adverse environmental impacts, (1) changes or alterations have been required in or incorporated into the Framework (by adoption of the TIMP as an implementation program of the Framework) and into the City's General Plan (by incorporating the TIMP recommendations into the Transportation Element of the General Plan); and (2) changes or alterations not wholly within the responsibility of the City have been adopted by LACMTA and SCAG which, if fully implemented in coordination with county, regional, state and federal transportation agencies, would mitigate or avoid the potentially significant effects on the environment with respect to the following environmental issue:
 - . Transportation

The potentially significant transportation impacts and mitigation measures are described in part "C" below.

- C. TRANSPORTATION
- 1. Impacts

The amount of population, employment, and housing growth that the Framework Element accommodates by policy, along with projected growth in the surrounding region could result in a significant increase in traffic congestion through an increase in the number of vehicle trips and vehicle miles traveled (VMT).

Average freeway speeds in the City of Los Angeles would be reduced by one-half. Citywide VMT increases by 38% over the 1990 baseline scenario by the year 2010. Regional growth (outside of the City of Los Angeles) accounts for over 60% of the total VMT increase within the City's corporate limits, due to regional cross trips. Eighty percent (80%) of the projected increase in freeway travel time in the 2010 Framework scenario (the Environmentally Superior Alternative) would also occur in the 2010 No Growth alternative.

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element's land use policy and program measures and the TIMP (if fully implemented in coordination with county, regional, state and federal transportation agencies) slow the rate of increase in VMT by encouraging a significant change in travel behavior from single-occupancy automobile use to other travel modes such as ridesharing, transit, walking, and bicycle use.

The land use measures encourage new development to locate in centers and districts that will be served by rail transit or high frequency bus transit. The land use measures also encourage walking through incentives for mixed-use residential and commercial development. In addition, development standards for community plan designated transitpriority streets and pedestrian-priority street segments encourage the creation of environments that facilitate and encourage walking over single-occupancy automobile use.

The TIMP is consistent with and furthers the objectives of the **Regional Transportation Plan** and the County Congestion Management Program. The TIMP includes transit and high occupancy vehicle (HOV) lane capital improvements, smart shuttle transit, park-and-ride and intermodal facilities, urban bicycle and pedestrian facilities, rideshare matching and information services, telecommuting facilities and satellite work centers, transit pass centers, and corridor-based vanpool programs. These policies, **programs and improvements** serve to discourage single-occupancy automobile use and to encourage ridesharing, bus and rail transit use, walking, and bicycle use.

Implementation of the TIMP will occur in a phased approach, which matches the need for improvements and programs to available funding. The City has adopted the TIMP as an implementation program of the General Plan Framework. In addition, the City has incorporated all of the 25 separate TIMP recommendations as well as the five additional FEIR mitigation measures into the City's Transportation Element of the General Plan adopted in September, 1999 (CF 97-1387). Contrary to the statement contained in the TIMP document, the City will be able to fund the programs identified in the TIMP at an average level of \$235 to \$240 million per year through to year 2015, based on the more thorough analysis of projected revenues described in the 11/18/98 TIMP cover letter and as discussed in Vol.III Comments and Responses on the TIMP.

By their very nature, most of the transportation infrastructure, facilities, and programs described in the TIMP are investments which routinely and historically have required the participation of county (LACMTA), regional (SCAG), state (Caltrans) and/or federal (FHWA, FTA) agencies. Numerous local, regional, state and federal funding sources are needed for this effort, along with innovative funding programs which are evolving at the state and federal levels. LACMTA (through its 2001 Long Range Transportation Plan for Los Angeles County) and SCAG (through its 1998 Regional Transportation Plan and 2001 RTP Update) have adopted transportation plans and funding programs which support and enable implementation of the TIMP. Federal legislation critical to the City's efforts to implement the TIMP [the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991] has been reenacted and enhanced through the Transportation Equity Act for the 21st Century (TEA-21) adopted by Congress in June, 1998 thereby extending the federal commitment through to 2004. Current levels (based on the annual average for the period FY93/94 through FY97/98)of county, state and federal investment in transportation infrastructure and programs must be maintained in order for the TIMP to be fully implemented. While analysis indicates that this is a reasonable expectation, the actual funding level commitments of the county, state, and federal governments cannot be guaranteed by the City.

The land use measures and **full implementation of** the TIMP result in an increase in transit ridership from 1.1 million daily transit tries (1990 base year) to 2.9 million daily transit trip-ends. Every community plan area experiences a reduction or no change in both freeway and arterial street travel times as a result of implementing the Framework Element's land use measures and the TIMP, with the exception of the Harbor Gateway community plan area, where the average freeway travel time would increase from 1.4 minutes to travel one mile to 1.6 minutes to travel one mile. This increase is considered relatively small and not a significant impact because the average freeway travel time in the Harbor Gateway plan area would still be among the fastest freeway travel times in the City.

In addition to the Framework Element and TIMP, additional mitigation measures are recommended by the Final EIR:

- Continue to provide infrastructure for zero-emission and low-emission vehicles to support 100 percent of the vehicle fleet.
- Expand the rail transit system, with new corridors that connect Regional Centers with each other and with high population areas.
- Implement and adjust regional market incentive measures, such as congestion pricing or other user fees, to control levels of traffic on the highway system.
- Continue to expand the bus system, incorporating new operating and technological concepts to maximize its cost effectiveness.
- Continue to develop Intelligent Transportation Systems and supporting infrastructure to expand the capacity of the existing highway system.

Pursuant to Section 21081 of the Public Resources Code, the City finds the second mitigation measure to be an action which is within the responsibility of another agency (LACMTA) and has or should be adopted by that agency. The City will not adopt this measure as written, but will adopt the following measure as a substitute: "Encourage the expansion of the rail transit system, with new corridors that connect Regional Centers with each other and with high population areas." The other four additional mitigation measures recommended will be adopted as shown on Summary Table 1 of the FEIR.

While the City is committed to, and reasonably expects to be able to, implement the TIMP and the additional FEIR measures, the Court of Appeal opinion issued 09/28/2000 concluded that the City has not made a "binding commitment to implement the mitigation measures" nor has it "required [these mitigation measures] as a condition of project approval". In light of this Court of Appeal opinion, given the inability of the City to (1) guarantee future funding commitment to implement); or (2) to impose these types of mitigation measures on individual private development projects (and thereby require them as conditions of approval), therefore pursuant to Section 21081 (c) of the Public Resources Code, the City finds these mitigation measures to be infeasible.

3. Significance

Implementation of these mitigation measures will avoid or substantially lessen these potentially significant effects. However, if current levels of county, regional, state and/or federal participation in transportation infrastructure investment are not maintained, the City may not be able to fully implement the TIMP and/or the additional FEIR mitigation measures, and potentially significant unmitigated effects on transportation could result from the projected growth accommodated by the General Plan Framework despite the best efforts of the City.

D. <u>HOUSING/POPULATION</u>

1. Impacts

Accommodating SCAG's population growth forecast without overcrowding requires the construction of an additional 266,143 dwelling units by the year 2010.

These impacts are potentially significant.

The Framework Element's population assumptions are consistent with SCAG's population forecast. Thus, the Framework Element's impact on population is insignificant because it does not encourage growth greater or lesser than projected by SCAG. Population projections are subject to change based on evolving trends and circumstances. Projected population growth may or may not occur, depending on migration patterns, birth rates, and other demographic and economic factors.

2. Mitigation Measures

The Framework Element provides sufficient land use capacity and adequate incentives to accommodate the necessary volume of residential development, consistent with the City of Los Angeles General Plan Housing Element, to maintain adequate shelter, affordability, and variety in housing types that meets the needs of a diverse population without overcrowding.

The Framework Element additionally includes measures that encourage mixed commercial and residential development, especially along the City's strip commercial corridors and the rehabilitation and restoration of deteriorated and aging housing units. Other mitigation measures encourage the development of housing for all income levels, the distribution of affordable units throughout the City, and the construction of dwelling units to accommodate larger households.

In addition to the Framework Element, other mitigation measures recommended by the Final EIR include:

- Create incentives to encourage the development of units appropriate for families with children and larger families.
- Create development standards to ensure appropriate unit design and amenity provisions for families with children and larger families.

Pursuant to Section 21081 of the Public Resources Code, the City finds both these mitigation measures to be unnecessary in that the measures are already integrated into the General Plan Framework Element. Programs P2, P23 and P24 and their related policies (4.1.4, 4.1.6, and 4.1.7) already commit the City to developing citywide standards which create incentives to encourage the development of larger units and units and amenities designed for large families and families with children. Also, the City has recently adopted Ordinance #170764 (Affordable

Housing Incentives Ordinance) which addresses design standards and provides incentives for larger units for families with children and larger families by reducing parking requirements. In addition, the City is processing amendments to the Affordable Housing Incentives Ordinance to specifically address provision of amenities. The City Planning Commission, on June 13, 1996, adopted another ordinance amendment which allows the density of housing and mixed use (housing and commercial) project to calculate density based on lot area instead of buildable area. This will remove the disincentive for larger units. Therefore, the City will not adopt these measures because they are already contained in the General Plan Framework Element.

3. Significance

Imposition of these mitigation measures and/or alterations will avoid or substantially lessen these potentially significant effects.

E. <u>SOLID WASTE</u>

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the solid waste stream as compared to existing baseline levels of solid waste (1990). The Final EIR demonstrates that total 1992 permitted landfill capacities will be exhausted by the year 2002. The impacts result from limited existing landfill capacities and increased residential and commercial solid waste attributed to greater numbers of residents and employees working in and commuting to the City of Los Angeles from outlying communities.

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element includes policies and programs, consistent with the City of Los Angeles Solid Waste Management Plan, which insure that the demand for solid waste disposal will be met by providing the means for solid waste stream reduction and diversion. The policy and program measures include recycling, reuse, and composting of solid waste in a manner that minimizes adverse environmental impacts. Other policy and program measures maximize source reduction and materials recovery and minimize the amount of waste requiring disposal, provide for development of adequate recycling facilities, and provide for solid waste reduction and recycling public education programs. There are no additional mitigation measures, over and above those incorporated into the General Plan Framework, recommended by the EIR.

3. Significance

Imposition of these mitigation measures and/or alterations will avoid or substantially lessen these potentially significant effects.

F. WASTEWATER

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in wastewater as compared to existing baseline (1990) levels. The Final EIR demonstrates that by the year 2010 the City would be required to treat 566 million gallons of wastewater per day (MGD), an increase of 233 MGD from 1990 wastewater levels.

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element includes policies and programs, consistent with the City of Los Angeles Wastewater Facilities Plan Update, which ensure that the demand for wastewater treatment can be met by providing the means for treating increased wastewater volumes consistent with public health and clean water measures and objectives. The measures include monitoring of wastewater generation, collection and treatment of wastewater as required by law, provision for additional wastewater treatment capacity in the Hyperion Treatment Service Area, and minimization of wastewater flow through water conservation techniques. There are no additional mitigation measures, over and above those incorporated into the General Plan Framework, recommended by the EIR.

3. Significance

Imposition of these mitigation measures and/or alterations will avoid or substantially lessen these potentially significant effects.

G. WATER RESOURCES

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the demand for water as compared to existing baseline levels (1990).

The Department of Water and Power projects that year 2010 water supply will be an estimated 1,370,646 acre feet of water per year, more than adequate to meet anticipated year 2010 water demand, an estimated 783,571 acre feet of water per year. Regardless that water supply is anticipated to exceed demand, the Final EIR nevertheless concludes that this is a significant adverse environmental impact requiring mitigation because the City's long term water supply is dependent on a number of uncertainties, such as groundwater which is subject to chemical contamination, the uncertainty of the supply of water available from the Los Angeles Aqueduct from Mono and Inyo Counties, and the uncertainty of the Metropolitan Water District's water supply from the State Water Project.

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In addition to uncertainties concerning the long-term reliability of the City's water supply, the system that distributes this water is aging. Many of the pipes in the City's water distribution system are old, dating from the 1940s, and are in need of repair or replacement.

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element includes policies and programs, consistent with the Los Angeles Department of Water and Power Urban Water Management Plan, which ensure that the demand for water will be met. The policies and programs include increasing the reliability of the City's long term water supply through development of cost effective alternative sources, including water reclamation and exchanges and transfers, water conservation techniques, and cleaning and lining (or replacing) all deficient water distribution lines in the City. There are no additional mitigation measures, over and above those incorporated into the General Plan Framework Element, recommended by the EIR.

3. Significance

Imposition of these mitigation measures and/or alterations will avoid or substantially lessen these potentially significant effects.

H. UTILITIES

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the demand for electricity and natural gas (and have related impacts in terms of electric and magnetic fields [EMF]), as compared to existing baseline levels (1990).

Total demand for electric power could rise from a 1990 base year amount of 24,968 gigawatt-hours per year to 36,882 gigawatt-hours per year by the year 2010. The Department of Water and Power's (DWP) electric production for the year 2010 will be 39,059 gigawatt-hours per year, which will more than meet projected demand. However, if electric power conservation and cogeneration are not pursued at current levels, the actual demand for electric power could rise as high as 84,103 gigawatt-hours per year, greatly exceeding anticipated supply.

The increased production of electric power could increase the amount of EMF exposure for significant portions of the population. Some proposed centers, districts, or mixed use boulevards will be placed in proximity to utility facilities which will generate EMF. Currently, it is not known whether exposures to EMF -- over a long time, at high intensities, and at different frequencies or combinations -- pose a risk to human health. The California Public Utilities Commission emphasizes that the scientific community has not isolated the impact on human health, if any, of exposure to EMF from utility facilities.

Total demand for natural gas could rise to 228 billion cubic feet of natural gas per year. Assuming that the Southern California Gas Company supplies the City of Los Angeles with the same proportion of its natural gas supply in 2010 as it currently does, Los Angeles' supply could equal over 237 billion cubic feet per year. The Final EIR concludes, however, that "because projected Citywide demand for natural gas is less than what the Southern California Gas Company is prepared to supply, it appears that growth permitted under the Framework Element would generate adverse but less than significant effects on the overall supply of natural gas."

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element includes policies and programs which address the provision of electric power. The policies call for continued monitoring and projection of power demand, expansion of DWP's generating and distribution capacity before it is needed, and identification by DWP of construction projects that would overload a part of the distribution system during a period of peak demand. The Framework Element also includes a policy that requires all new construction projects to incorporate power conservation and energy efficiency measures as conditions of approval.

The Final EIR states that a "proactive policy of 'prudent field management' shall be taken to mitigate the exposure to EMF where no-cost and low-cost steps are feasible for the particular development or project."

The Final EIR also states that "It is therefore assumed pursuant to the laws of supply and demand, that Southern California Gas Company will continue to meet the natural gas needs of the City, particularly since anticipated demand under the Framework Plan would not exceed currently forecasted 2010 supply levels."

In addition to the Framework Element, other mitigation measures recommended by the final EIR include:

- The Land Use Element of the Framework Plan shall incorporate policies which call for the design standards to minimize the potential health risks associated with low frequency electromagnetic fields.
- Policies 9.29.2, 9.29.3, and 9.29.5 shall be revised to encourage cogeneration where cost effective, require energy conservation and energy efficient measures in all new construction, and expand energy conservation through all departments in the City. These revised measures shall be placed into the Conservation Element of the General Plan which shall also include the following natural gas conservation strategies:
 - a) Retrofitting existing buildings with energy conservation measures;
 - b) Requiring the use of pilotless ignition on appliances;
 - c) Use of solar water heaters;

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- d) Providing incentives for cleaner and less energy-intensive industrial development;
- e) Encouraging improvements in natural gas distribution and storage; and
- f) Coordination with the gas company to provide greater technical and financial assistance to developers to allow the inclusion of energy conserving designs. (Mitigation measure corrected per FEIR Summary Table 1 Errata Sheet.)

The first mitigation measure was included in error and is deleted for the reasons shown on the FEIR Summary Table 1 Errata sheet. The Errata Sheet also addresses the second mitigation measure by correcting the policy number, which is cited incorrectly, and name of the document to contain these revised policies. The second mitigation measure will be adopted with these corrections.

3. Significance

Imposition of these mitigation measures and/or alterations will avoid or substantially lessen these potentially significant effects.

I. FLOOD CONTROL/DRAINAGE

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the amount of new development which would result in a significant increase in impermeable land, resulting in a significant increase in storm water runoff.

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These impacts are potentially significant.

2. Mitigation Measures

The Framework Element includes measures which ensure that the increased stormwater runoff will be mitigated, resulting in enhanced flood control during 100-year or 500-year floods. The measures include incentives for maintenance of ground permeability, creation of flood control basins along the Los Angeles River, and requirements for on-site management of rainwater and irrigation run-off.

In addition to the Framework Element, other mitigation measures recommended by the Final EIR include:

- Revise Policy 6.2.1 to clearly state that open space utilization plans for the Los Angeles River shall take into consideration the fact that flood control is, and shall be, the Los Angeles River's primary function.
- The Framework Land Use Diagram shall state that the centers, districts, and mixed use boulevards in the 100 and 150 year flood plain shall not proceed with development until such time as the flood control

measures have eliminated that hazard from those areas. (Mitigation measure corrected per FEIR Summary Table 1 Errata Sheet.)

Pursuant to Section 21081 of the Public Resources Code, the City finds the first additional mitigation measure to be unnecessary in that the existing Policy 6.2.1 of the element already calls for open space improvements and plans to consider the primary purpose of the Los Angeles River as flood control. Therefore, the City will not adopt this measure because it is already incorporated into the Framework Element

The second measure will be adopted as shown on the FEIR Summary Table 1 Errata Sheet where it is modified to reflect current terminology.

3. Significance

Imposition of these mitigation measures and/or alterations will avoid or substantially lessen these potentially significant effects.

J. <u>POLICE</u>

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the demand for police protective services as compared to existing baseline levels (1990). Based on the planning ratio standard used to determine the adequacy of the supply of sworn officers, a total of 17,673 officers would be needed to adequately accommodate the City's 2010 average day/night population. This is in comparison to the 8,817 sworn officers that were on the force as of 1990.

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element's economic development policy targets an employment base that exceeds SCAG's jobs forecast to maintain the City's 1990 jobs/housing ratio through the year 2010. This increased economic base will provide additional revenue necessary to pay for added police protective services. Additionally, the Framework Element includes a policy that requires the City to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and public services.

In addition to the Framework Plan, other mitigation measures include:

- Planning Standards indicating the most appropriate number of sworn police officers for implementing police services shall be established.
- The existing number of sworn police officer shall be enhanced by meet the established planning standards.

• Additional resources for funding the enhancement of the number of sworn officers needed to meet the established planning standard shall be sought.

These additional mitigation measures will be adopted as shown on FEIR Summary Table 1.

3. Significance

Imposition of these mitigation measures and/or alterations will reduce impacts to a less than significant level.

K. <u>RECREATION AND OPEN SPACE</u>

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the demand for recreation and public open space as compared to existing baseline levels (1990). Several recommended centers, districts, and mixed use boulevards would be placed well outside the service areas of existing neighborhood or community parks.

In addition to increased recreation impacts, the Framework Element would result in open space impacts in that privately owned vacant lands with non-rural zoning could be developed with non-open space uses and privately owned open space with rural zoning could be lost to the development of one dwelling unit per acre. The loss of private open space is considered to be an adverse but less than significant impact because the City currently meets the planning standards of 10% of all lands being in public open space. Also, existing public open space would not be lost as a direct result of the Framework. In open space deficient areas, development under the Framework would result in existing open spaces being increasingly utilized and the potential for over-use. This is a potentially significant impact.

2. Mitigation Measures

The Framework Element's economic development policy targets an employment base that exceeds SCAG's jobs forecast to maintain the City's 1990 jobs/housing ratio through the year 2010. This increased economic base will provide additional revenue necessary to pay for added recreation services. Additionally, the Framework Element includes a policy that requires the City to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and services.

The Framework Element also includes measures that encourage the provision of additional recreational facilities and open space areas within centers, districts, and mixed use boulevards through the use of school yards as parks, small urban parks developed with mixed-use structures, and community facilities.

The Framework Element encourages the establishment of a comprehensive citywide greenways network linking various components of the City's open space network (including mountains, the coastline, utility easements, and

parks) that offers unique opportunities to increase open space within existing highly urbanized patterns of development.

The Framework includes policies which provides for the preservation and enhancement of open space, including policies to protect remaining open spaces and to preserve habitat linkages, natural wildlands and viewsheds, which further reduce impacts associated with loss of private open space.

In addition to the Framework Element the following mitigation measure is recommended by the EIR:

- The Framework Plan Map should be revised to include an overlay zone in certain portions of the City's open space areas which would allow for the following:
 - *Discretionary review of proposed development in overlay districts.
 - *Application of specific site design guidelines which allow for the retention of as much contiguous open space as possible in the overlay districts.

Pursuant to Section 21081 of the Public Resources Code, the City finds this mitigation measure to be infeasible and inappropriate as written in that: a) the City has adopted an open space zone pursuant to court order which is the appropriate tool for identifying open space; b) it is infeasible at this point in time because indicating on the Framework Diagram the location(s) appropriate for application of the open space zone requires detailed studies on a community plan basis which is not possible at this time, but will be carried out by the City during the updating of the Open Space Element of the General Plan and the updating of the Community Plans; and c) the General Plan Framework Element already calls for the development of a Mountain Overlay zone in Program 70 (policy 6.1.6) to preserve private land with open space characteristics to the extent feasible. Therefore, the City will not adopt this mitigation because it is already part of the Framework and because the City is proceeding with a program to update community plans, including open space.

3. Significance

Imposition of these mitigation measures and/or alterations will reduce impacts to a less than significant level.

L. <u>GEOLOGIC/SEISMIC CONDITIONS</u>

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in the number of persons exposed to geologic/seismic safety hazards, including seismic shaking and fault rupture, liquefaction, tsunami and seiche hazards, slope stability/erosion hazards, oil extraction-related subsidence, and seismic-related dam failure, as compared to existing baseline levels (1990). These impacts result from the placement of centers, districts, and mixed use boulevards in locations subject to one or more of these hazards.

These impacts are potentially significant.

2. Mitigation Measures

The Framework Element's programs and measures require consistent implementation and enforcement of existing development and construction standards and programs and the development of new standards, programs, and procedures that provide additional mitigation of geologic/seismic safety hazards.

Measures contained in the City's 1971 Seismic Safety Plan and the current building code establish development and construction standards which have the potential to reduce the hazards associated with slope stability and erosion, liquefaction, shallow groundwater, oil-field-related subsidence, dam failure, fault rupture hazards, ground shaking, tsunamis and seiches. However, fault rupture, subsidence, seismic shaking, liquefaction, dam failure and tsunami hazards are not adequately mitigated by the implementation of these existing development and construction standards.

The Final EIR identifies several additional mitigation measures which serve to mitigate these residual hazards to a level of insignificance:

- The City Survey Division shall update its report of the Precise Level Benchmark Index through 1993 and shall perform an evaluation of the data to assess possible subsidence at the oil field and drilling areas underlying the City. Based on the Results of this evaluation a mitigation program for reducing the potential hazards shall be prepared.
- The City shall evaluate all data related to observations of possible methane gas seepage for projects in or near the City and associate with oil fields. The City shall consider designation additional methane seepage districts. In accordance with City Sec. 91-1500 (Public Resources Code Section 3860) the City shall consider establishing and formally designation additional methane seepage districts. If such districts are established, the City shall apply for grants as described in the PRC Section 3860, and the data shall be prepared.
- The City shall determine the safety status of all dams which may fail and cause inundating within the City. This shall be done in cooperation with the County of Los Angeles and the State Division of Dam Safety in order to establish the safety status and to determine what follow-up analyses, if any, are needed. Based on these results the City shall develop risk guidelines to allow preparation and implementation of regulatory measures for future development. These guidelines and measures shall be prepared.
- The City shall continue to fully implement those faults related policies and programs from: the Seismic Safety Plan related to Fault Rupture Study Zones, Engineering Investigation Reports. In addition, the City shall consider results from ongoing fault activity investigations by consultants, and State and Federal agencies.
- The City shall continue to fully implement liquefaction related policies and programs from the Seismic Safety Plan related to liquefaction standards, Engineering Investigation Reports. In addition, the City shall consider results from ongoing liquefaction investigations by consultants, and State and Federal agencies.

A clear specification of requirements shall be prepared by the City to govern the conduct of liquefaction studies in the City, related to and shall consider results form ongoing liquefaction investigation by others. Clear specification shall be prepared to govern the conduct of liquefaction studies in the City.

• The City shall adopt and maintain high standards for seismic performance of buildings, through prompt adoption and careful enforcement of the best available standards for seismic design. Building codes in use in the City need to be assessed to determine if they are sufficient for the high level of ground shaking anticipated in close proximity to major faults. The City shall consider incorporating the most recent revisions or anticipated revisions for seismic design criteria by the SEAOC into its Building Code for critical, sensitive, or high-occupancy structures.

• The City shall update its evaluation of the tsunami hazard (including locally generated events), make its standards more specific and disseminate information available to tsunami warnings and on procedural steps to prepare the populace for such an event. Mitigation measures shall be suggested for new construction.

In relation to the first additional mitigation, the City finds that this is infeasible in that the City does not have the necessary resources, and unnecessary because the City of Long Beach is performing such a study for the entire harbor area, including the City of Los Angeles. The City performs evaluation of the data where problems are identified. Therefore, the City will not adopt this measure because the issue is already being addressed through other programs.

The second mitigation measure calls for an evaluation of possible methane gas seepage and designation of methane seepage districts. The City finds that this measure is unnecessary because: a) a survey has been completed for the entire southern California area; b) the seepage areas are designated; c) the Los Angeles Municipal Code provides for additional designation as needed; and d) the municipal code is already law and is being implemented. Therefore, the City will not adopt this measure because the issue is already being addressed.

The City finds that the third mitigation to evaluate dam safety is unnecessary and redundant in that the City has completed both the evaluation of all dams and has made the necessary repairs rather than implement regulatory measure for future development. Therefore, the City will not adopt this measure because this issue has already been addressed.

The fourth, fifth and sixth mitigation measures will be adopted as additional mitigation.

The City finds that the final mitigation measure to evaluate tsunami hazard is unnecessary and in that the City has already adopted the "Flood Hazard Specific Plan" (1980, amended 1988) which adequately addresses all types of flood hazard issues, including tsunami, and provides construction standards. The City's existing Emergency Operations Organization plans address procedural steps for preparing for such an event. Therefore, the City will not adopt this measure because the issues has been addressed in other plans, documents, and procedures.

3. Significance

Imposition of these mitigation measures and/or alterations will reduce impacts to a less than significant level.

V. <u>UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS -- CLASS I</u>

The Council of the City of Los Angeles finds that even with the imposition of all feasible mitigation measures, the Framework Element has the potential to cause significant adverse impacts on the following areas of the environment (Class I impacts as identified in the Final EIR):

- Land Use
- Urban Form
- Air Quality--Particulate Emissions
- Biological Resources

In the case of land use, the significant adverse environmental impact relates to: the intensification of single family residential areas for duplex and secondary units, conversion of residential areas for industrial uses, the intensification of existing commercial areas for higher density commercial and/or mixed use, conversion of industrial properties for other uses, and intensification of mixed density neighborhoods designed for higher density development where a "stable" neighborhood exists. In the case of <u>urban form</u>, the significant adverse environmental impacts relates to increases in the height and intensity of development in certain centers, districts, and mixed use boulevards that is out of scale with existing development. All other impacts on urban form are either mitigated to insignificance or are beneficial. In the case of <u>air quality</u>, the significant adverse environmental impact relates to particulate emissions. All other air quality impacts (ROG, NOx, and SOx emissions) are mitigated to a level of insignificance. In the case of <u>biological resources</u>, the significant adverse environmental impact is caused by the loss of privately owned open space outside of centers, districts, and mixed use boulevards.

A. LAND USE

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy, and the pattern and distribution of that growth as encouraged by the Framework Element, could have the following impacts on the City's existing land uses, as summarized below:

a. Existing Single Family Residential Areas

The Framework Element includes policies that maintain the functional role and pattern of uses of existing singlefamily residential areas. Therefore, there would be no significant impacts on these neighborhoods.

However, there could be significant impacts to areas of the City that presently are single family in character but that are zoned for multi-family densities. To maintain the character of these single-family neighborhoods, the Framework includes a policy to permit a reduction in existing permitted densities through revisions to the community plans.

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b. Existing Multi-Family Residential Areas

The Framework Element includes policies that generally maintain the functional role and pattern of uses of existing multi-family residential areas. Therefore, there would generally be no significant impacts on these neighborhoods.

There could be significant impacts on mixed density neighborhoods that include a mix of multi-family and singlefamily dwellings. If the mixed density neighborhood is stable, evolution to the higher permitted densities would be a significant impact. However, the Framework Element allows for reductions in permitted densities through revisions to the community plans in areas where there is inadequate infrastructure or services. If the mixed density neighborhood is not stable, evolution to the higher permitted densities would be a beneficial impact.

c. Existing Residential Transition Areas

The Framework Element includes policies that support amendments to the community plans to designate areas adjacent to centers, districts, and mixed use boulevards for higher densities or to convert these lands to industrial uses. The establishment of consistent densities in transitional areas adjacent to higher density centers, districts, and mixed use boulevards is considered to be a beneficial impact.

The conversion of some transitional areas to industrial use is considered a potentially significant land use impact that is mitigated by the Framework Element's land use polices that require protection of lower-density residential neighborhoods and no adverse environmental impacts. The conversion to industrial uses could be considered a beneficial impact if it leads to added employment opportunities that offset the negative consequences of a slower rate of job growth as forecast by SCAG.

d. Existing Commercial Areas

The Framework Element includes policies that encourage the integration of mixed-use residential and commercial development in centers, districts, and mixed use boulevards. The introduction of residential development in commercial areas is considered a potential significant impact. However, the increased pedestrian activity and potentially increased transit use that would result from mixed-use development is considered a beneficial impact.

The increased level of development in centers, districts, and mixed use boulevards is considered a potentially significant impact. However, the impacts on adjacent residential neighborhoods would be mitigated by existing transitional height requirements.

e. Existing Industrial Areas

The Framework Element includes policies that encourage the preservation of existing industrial areas to provide a land bank for future economic expansion consistent with the Framework Element's policy to increase the rate of current job growth to a level that will maintain the City's 1990 ratio of jobs to housing through the year 2010. Therefore, there would be no significant impacts on these areas as all currently designated industrial areas would remain in industrial use.

f. Open Space

The City's existing open-space inventory includes privately owned properties that are developed or zoned for low density residential uses, at densities up to two units per gross acre. Some intensification of development and loss of privately owned open space could occur, as permitted by the adopted Community Plans and zoning (the Framework maintains all existing designations in these areas). Potential impacts would be reduced by insignificant levels through the continued implementation of the Hillside Management Ordinance.

Publicly owned open space would not be replaced as a result of implementing the Framework Element because the Framework Element does not recommend the placement of centers, districts, or mixed use boulevards on any publicly owned open space land.

Growth could result in the over-utilization of existing open space areas in more urbanized areas of the City that exhibit open space deficiencies. This is considered to be a significant impact.

2. Mitigation Measures

The Framework Element encourages most new commercial and residential growth to locate in existing commercial districts that have excess zoning capacity and that are or will be well-served by transit. The effect of this policy is to contain the amount of change by focusing it into a limited number of areas that have the capacity to absorb additional growth, thereby protecting the character of low-density residential areas.

Market pressures to develop privately owned open space would be partially diverted to more centrally placed urban "in-fill" areas (primarily commercially zoned properties) rather than in large tracts of undeveloped land at the City's perimeter. Without the incentives provided in the centers, districts and mixed-use boulevards, market-driven growth would result in more development of privately owned open space.

To offset the exacerbation of current open space deficiencies through additional growth, the Framework Element includes measures that encourage the development of additional recreational facilities and open space areas within centers, districts, and mixed use boulevards through the use of school yards as parks, small urban parks developed with mixed-use structures, and the location of community facilities in or near centers, districts, and mixed use boulevards.

The Framework Element also encourages the establishment of a comprehensive citywide greenways network linking various components of the City's open space network (including mountains, the coastline, utility easements, and parks) that offers unique opportunities to increase open space within existing highly urbanized patterns of development.

In addition, by encouraging growth to concentrate in centers, districts, and mixed use boulevards instead of outlying open space areas, the Framework Element will be more effective at protecting privately owned open space than alternatives that permit a more dispersed, automobile-oriented and market-driven approach to the allocation of growth.

3. Significance

Even with the imposition of all feasible mitigation measures, the following land use considerations have the potential to cause significant and unavoidable adverse impacts:

- Intensification of single family residential areas if determined by the Community Plans;
- Conversion of residential areas for industrial uses if determined by the Community Plans;
- Intensification of certain existing commercial areas for high density commercial and/or mixed-use development;
- Conversion of industrial properties for other uses if determined by the Community Plans; and
- Intensification of mixed density neighborhoods designated in Community Plans for higher densities.

All other impacts on land use are either mitigated to a level of insignificance or are considered beneficial.

B. <u>URBAN FORM</u>

1. Impacts

The impact of the Framework Element's policy and program measures would be an urban form that consistently enhances the sense of identity and place for each of the City's neighborhoods, districts, centers, and boulevards and quality of life for the City's residents. There would be a significant reduction in the sense of physical sprawl and sameness that characterizes many areas of the City. This is considered to be a beneficial impact.

Nevertheless, the amount of population, employment, and housing growth that the Framework Element permits by policy would result in an increased level of development (height and bulk of structures) in some existing commercial areas targeted for densification that, in some cases, would be out of scale with surrounding properties. Adherence to the Framework Element's urban form policy and program measures would not reduce the scale of this development but would mitigate its environmental impacts to a level of insignificance through policy and program measures that control the impacts on adjacent neighborhoods (transitional height ordinance) and that provide for quality development with usable open space.

However, some residents may view any development that is out of scale with surrounding properties, regardless of the Framework Element's mitigating measures, to be significant and adverse. This is necessarily a subjective conclusion given the nature of urban form impact evaluation. Because impacts in the Final EIR are evaluated using a "worst-case scenario" form of analysis, the Final EIR concludes that any new development that is out of scale with surrounding properties is significant and adverse, even though these impacts could conceivably be considered beneficial, depending upon the point of view used.

a. Existing Single-Family Residential Areas

The Framework Element includes policies that maintain the form and character of existing single-family residential areas. Therefore, there would be no significant impacts on these neighborhoods.

The Framework Element does support, however, through amendments to the community plans, increased intensification of some existing single-family residential neighborhoods adjacent to centers, districts, and mixed-use boulevards where duplex or higher density units could be designated by the community plans to ultimately provide a smoother transition and a better buffer for more stable single-family neighborhoods. This is considered to be a beneficial impact.

b. Existing Multi-Family Residential Areas

The Framework Element includes policy and program measures that maintain the form and character of existing multi-family residential areas that are developed at the maximum level of density as permitted by existing land use regulations. Therefore, there would be no significant impacts on these neighborhoods.

Some transitional multi-family residential areas with a mixture of different unit types and densities would be permitted to intensify to the maximum development potential permitted by existing community plans. Achievement of consistent density in mixed-density areas is considered to be a beneficial impact.

Other transitional multi-family residential neighborhoods, with inadequate supporting infrastructure, would have their permitted densities reduced through amendments to the Community plans, thereby preserving their existing scale, form, and quality of life. This is considered to be a beneficial impact.

c. Existing Commercial Areas

The Framework Element contains policy and program measures that will either not impact, insignificantly impact, or will significantly benefit the urban form of existing commercial areas, as explained below:

<u>General Commercial</u>. The scale and form of general commercial nodes and low-intensity commercial districts would largely be retained. This is considered to be an insignificant impact.

<u>Neighborhood Districts</u>. Physically distinct neighborhood districts, that reflect the cultural heritage and/or needs of the surrounding community, would be established throughout the City. These districts would be pedestrian-oriented and would serve to reduce vehicular trips from surrounding residential areas. This is considered to be a beneficial impact.

New development would be largely in-fill and at the same scale as surrounding structures. This is considered to be an insignificant impact.

<u>Community Centers</u>. Physically distinct moderate density community centers, that reflect the cultural heritage and/or needs of the surrounding community, would be established at selected locations throughout the City. These centers would be pedestrian-oriented and would serve to reduce vehicular trips from surrounding residential areas. This is considered to be a beneficial impact.

New development would be largely in-fill and at the same scale as surrounding structures. This is considered to be an insignificant impact.

In some community centers, new development would be out of scale with surrounding structures, but would be mitigated through development standards and transitional height requirements that serve to mitigate the impacts of increases in the scale of development on surrounding neighborhoods. Nevertheless, from a "worst-case scenario" point of view, any increases in development that are out of scale with surrounding properties can be considered significant and adverse.

<u>Regional and Downtown Centers</u>. Physically distinct high density regional centers, that reflect the cultural heritage and/or needs of the surrounding community, would be established at a limited number of sites throughout the City. These centers would be pedestrian-oriented and would serve to reduce vehicular trips from surrounding residential areas. This is considered to be a beneficial impact.

New development would be largely in-fill and at the same scale as surrounding structures. This is considered to be an insignificant impact.

In some regional centers, new development would be out of scale with surrounding structures, but would be mitigated through development standards and transitional height requirements that serve to mitigate the impacts of increases in the scale of development on surrounding neighborhoods. Nevertheless, from a "worst-case scenario" point of view, any increases in development that are out of scale with surrounding properties can be considered significant and adverse.

<u>Boulevards</u>. Physically distinct mixed-use residential and commercial districts and multi-family residential neighborhoods would be established along commercial boulevards throughout the City. These boulevards would be pedestrian-oriented and would serve to reduce vehicular trips from surrounding residential areas. This is considered to be a beneficial impact.

New development would be largely in-fill and at the same scale as surrounding structures. This is considered to be an insignificant impact.

Along some boulevards, new development would be out of scale with surrounding structures, but would be mitigated through development standards and transitional height requirements. Nevertheless, from a "worst-case scenario" point of view, any increases in development that are out of scale with surrounding properties can be considered significant and adverse.

e. Existing Industrial Areas

The Framework Element includes policy and program measures that encourage the preservation of existing industrial areas to provide a land bank for future economic expansion consistent with the Framework Element's policy to increase the rate of current job growth to a level that will maintain the City's 1990 ratio of jobs to housing through the year 2010. Therefore, there would be no significant impacts on these areas as all currently designated industrial

areas would remain in industrial use at the same scale of development. This is considered to be an insignificant impact.

However, new industrial development would be required to meet enhanced landscaping requirements. This is considered to be a beneficial impact

f. Open Space

The Framework Element encourages the creation of a citywide greenways network that would connect existing parks, major recreational areas, and landscaped median strips. Existing rail rights-of-way and drainage channels would be landscaped and also connected to the greenways network. This is considered to be a beneficial impact.

2. Mitigation Measures

To mitigate the urban form impacts of the amount of growth forecast for the City of Los Angeles, the Framework Element includes a number of policy and program measures that enhance the City's urban form. These policy and program measures also reduce the impacts in a limited number of centers, districts, and mixed use boulevards where new development out of scale with existing development might occur. The policies and programs achieve these effects through urban design guidelines that encourage quality development and the set-aside of open space, integration of residential and commercial development (mixed use) with a pedestrian orientation, and development of small urban parks in centers, districts, and mixed use boulevards to provide visual relief and access to recreational facilities and open space.

3. Significance

Even with the imposition of all feasible mitigating measures, the amount of growth permitted by policy of the Framework Element has the potential to cause significant adverse environmental effects on urban form. Significant increases in the City's overall mass, scale, and intensity of development are unavoidable if growth occurs as forecast. That these impacts are "adverse" is a subjective conclusion, however, and some residents may consider them to actually be beneficial. All other impacts on urban form are either mitigated to insignificance or are considered to be beneficial.

C. AIR QUALITY -- PARTICULATES

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant 19% increase in particulate emissions as compared to baseline (1990) emission levels.

2. Mitigation Measures

The air quality-ROX, NOx, and SOx emissions mitigation measures identified in the Final EIR, along with the control measures contained in the Regional Air Quality Management Plan and anticipated combustion engine improvements, will all serve to slow the increase in emissions generated by increased VMT. However, the particulate emissions from vehicle tire wear and engine exhaust cannot be as effectively controlled as other vehicle emissions. Therefore, a significant impact on particulate emissions is expected to remain, even though the Framework Element is consistent with all applicable regional plans, including the Regional Air Quality Management Plan and the City's Air Quality Element and Clean Air Program.

3. Significance

Even with the imposition of all feasible mitigating measures, the amount of growth permitted by policy of the Framework Element has the potential to cause significant adverse environmental effects on air quality-particulates. The adverse impacts on air quality-emissions (ROX, NOx, and SOx) are discussed in Section IV-B of these Findings and Statement of Overriding Considerations.

D. BIOLOGICAL RESOURCES

1. Impacts

The amount of population, employment, and housing growth that the Framework Element permits by policy could result in a significant increase in impacts on biological resources as compared to existing conditions due to the development of privately owned open space outside of centers, districts, and mixed use boulevards. Such development would significantly disrupt and/or remove wildlife and native plant habitats.

2. Mitigation Measures

The Framework Element encourages most new growth to locate in existing commercial districts rather than lowdensity residential areas or existing open space lands (except for scattered in-fill sites in already built up areas of the City). Without the incentives provided by this targeted growth measure, market-driven growth would result in more development of privately owned open space. Also, the Framework includes objective 6.1 to protect the City's natural setting from urban encroachment and objective 6.2 which stresses maximization of the use of the City's existing open space network and facilities by enhancing the facilities and the connections. Framework policies 6.1.1 stresses protection of remaining open spaces, which also protects biological resources. Policies 6.4.8 through 6.4.11 of the Open Space chapter encourage: a) provide for maximization of existing public open space; b) encourage provision of small-scaled public open spaces; c) provide for joint use of open space, and d) seek opportunities to site open space adjacent to public facilities. Program 70 specifically addresses the maximum protection of privately-owned open space in the mountain and hillside areas.

Summary Table 1 of the FEIR refers, in error, to additional mitigation measures, but there is no discussion of such measures in the text. The text does indicate, however, that no direct impacts of the Framework are evident in the planning sub egions. While there are no Framework programs or policies specifically directed to address biological

resources, the strategy of focused growth and the policies and incentives that support that strategy, the open space policies, and other policies which address protection of currently open lands, will mitigate, to the fullest extent possible, the impacts on biological resources. Therefore, the reference to additional measures has been deleted pursuant to the Errata sheet and will not be adopted.

3. Significance

Even with the imposition of all feasible mitigating measures, the amount of growth permitted by policy of the Framework Element has the potential to cause significant adverse environmental effects on biological resources outside of centers, districts, and mixed use boulevards.

VI. <u>CUMULATIVE IMPACTS</u>

The California Environmental Quality Act (CEQA) defines cumulative impacts as two or more individual effects that, when considered together, are considerable or will compound other environmental impacts. Because the Framework Element is a citywide component of the City of Los Angeles General Plan, the impacts of growth accommodated in the Framework Element may extend beyond the borders of the City of Los Angeles into the larger surrounding region.

To provide a framework for regional planning, SCAG has adopted a Regional Comprehensive Plan and Guide (RCPG) that addresses most of the functional issue areas addressed by the Framework Element. SCAG has also completed an EIR for the RCPG in compliance with CEQA requirements. The local governments within SCAG's jurisdiction participated in the development of the RCPG through the provision of what was defined by SCAG as "subregional input."

The Department of City Planning developed the Framework Element, in part, to provide the "subregional input" of the City of Los Angeles into the RCPG. To this extent, the impacts reported in the RCPG Final EIR can serve as the cumulative impacts for the Framework Element Final EIR because the analysis is applicable to the entire SCAG region. Thus, the RCPG Final EIR serves by proxy as the cumulative impacts for most of the functional topics addressed by the Framework Element Final EIR.

The Council of the City of Los Angeles finds that the **projected growth accommodated in the** Framework Element results in significant, unavoidable cumulative impacts on the following areas of the environment:

- Land Use
- Transportation
- Geologic/Seismic Conditions -- Groundshaking and Surface Rupture
- Biological Resources -- Plant and Wildlife Habitat and Diversity and Sensitive Biological Communities in the Southwest SCAG Region
- Risk of Upset
- Public Health

These impacts result from projected growth in population, employment, and housing in the City of Los Angeles in accumulation with projected growth in population, employment, and housing in the SCAG region outside of the City's boundaries and thus outside of the City's regulatory control. This projected growth outside of the City accounts for over 60% of the total vehicle miles traveled (VMT) increase within the City's corporate limits, due to regional cross trips, and accounts for 80% of the projected increase in freeway travel time by 2010.

The Council of the City of Los Angeles also finds that the **projected growth accommodated in the** Framework Element results in less than significant cumulative impacts on the following areas of the environment:

- Urban Form
- Housing/Population
- Solid Waste
- Wastewater
- Water Resources
- Utilities
- Fire/Emergency Medical Services
- Police
- Schools
- Libraries
- Recreation and Open Space
- Cultural Resources
- Geologic/Seismic Conditions -- All Impact Areas Except Groundshaking and Surface Rupture
- Biological Resources -- All Impact Areas Except Plant and Wildlife Habitat and Diversity and Sensitive Biological Communities in the Southwest SCAG Region
- Air Quality
- Noise

VII. <u>ALTERNATIVES</u>

The Final EIR describes a reasonable range of alternatives to the Framework Element which could feasibly attain the basic objectives of the Framework Element. The Council of the City of Los Angeles has evaluated the comparative merits of the alternatives, and rejects these alternatives in favor of the Framework Element for the reasons set forth in the Final EIR and as explained below:

A. <u>NO GROWTH ALTERNATIVE</u>

1. Description

The No Growth Alternative assumes the imposition of a citywide development moratorium to maintain the City's 1990 population, employment, and housing levels through the year 2010. Compared to the Framework Element, the alternative assumes 19% less population, 17% less employment, and 17% less housing. However, the alternative

also assumes that the cities and counties surrounding the City of Los Angeles would continue to grow as forecast.

2. Impacts

Compared to the Framework Element, the negative impacts of the No Growth Alternative would be greater for land use, urban form, housing, and transportation. The City's current dispersed pattern of land use and urban form, which discourages walking and transit usage, would remain unaltered without the Framework Element's policy and program measures which encourage mixed-use, transit-oriented development, thus perpetuating a current negative situation that could be corrected by new development that occurs in accordance with the Framework Element's policy and program measures. The prohibition on new residential development would exacerbate the affordable housing crisis as the City's housing stock deteriorates. The Framework Element, however, provides capacity for new housing, thus ensuring that artificial policy constraints do not inadvertently reduce supply relative to demand, thus contributing to housing price inflation. The No Growth Alternative's lack of a comprehensive citywide TIMP, along with the impacts of regional growth, would create greater transportation impacts than the Framework Element, which includes pro-active transportation improvement and mitigation measures and encourages the concentration of new development near transit stations. If a moratorium were imposed, some or all of the development that would otherwise occur in Los Angeles would locate in adjacent cities, contributing to a higher rate of regional growth outside Los Angeles.

Due to overall less development and growth within the City of Los Angeles, however, the No Growth Alternative's impacts would be less for solid waste management, wastewater resources, water resources, utilities, flood control and drainage, fire/EMS, police protective services, education, libraries, recreation and open space, cultural resources, public health, geologic conditions/seismic safety, biological resources, noise, and risk of upset. The impacts on air quality would be the same or similar as the Framework Element's for two reasons: (1) regional growth would still increase air pollution in the South Coast Air Basin; and (2) the No Growth Alternative does not contain policies and programs for encouraging a mode shift from the private automobile to transit and other forms of ridesharing. Thus, even though development in Los Angeles would not be as great as it would be under the Framework Element, regional growth and an unaltered dependence on the automobile would generate comparable pollution levels.

3. Feasibility

The No Growth Alternative is infeasible because a citywide development moratorium would push some or all of the new development that would otherwise occur in Los Angeles to nearby communities, thus still contributing to adverse regional air quality and transportation impacts that would affect City residents. The SCAG RCP<u>G</u> does not call for a development moratorium in any community located within its jurisdiction, nor have any cities or counties within SCAG's jurisdiction imposed a development moratorium.

If a development moratorium were imposed, vacancy rates would drop as the City's housing stock deteriorated and no replacement housing was built, contributing to increased homelessness and overcrowding. A development moratorium would have deleterious effects on the City's economy, contributing to increased unemployment, both in the construction industry and those sectors of the economy affected by the construction industry. A development moratorium would disproportionately affect those areas of the City negatively impacted by the Northridge Earthquake

of 1994 and the civil disturbances of 1992, where rebuilding and reconstruction efforts have not commenced or been approved.

B. <u>NO PROJECT ALTERNATIVE</u>

1. Description

The No Project Alternative assumes that the City of Los Angeles will have population, employment, and housing growth consistent with the buildout capacity of the existing set of adopted community plans. (In the City of Los Angeles, the community plans collectively comprise the Land Use Element.) The alternative assumes no date for full buildout. Compared to the Framework Element, the alternative assumes 44% greater population, 252% greater employment, and 41% greater housing at full buildout of the existing adopted community plans.

2. Impacts

Due to the No Project Alternative's overall greater development and growth as compared to the Framework Element, impacts would be more significant for land use, urban form, solid waste management, wastewater resources, water resources, utilities, flood control and drainage, transportation, fire/EMS, police services, education, libraries, recreation and open space, cultural resources, public health, geologic conditions/seismic safety, biological resources, air quality, noise, and risk of upset. Because the No Project Alternative would result in a greater percentage of new rental units affordable to very low, low, and moderate income groups than under the Framework Element, the impacts would be less for housing.

3. Feasibility

The No Project Alternative (buildout of the existing set of adopted community plans) is infeasible because the greater levels of population, employment, and housing would produce environmental effects significantly more adverse than the Framework Element. The No Project Alternative is furthermore infeasible because the permitted levels of population, employment, and housing are insupportable given current and planned levels of infrastructure and transit services.

C. TRANSIT BUILDOUT ALTERNATIVE (A1 ALTERNATIVE)

1. Description

The Transit Buildout Alternative (referenced as "A1" in the Final EIR) assumes that the Los Angeles County Metropolitan Transportation Authority (MTA) will construct and operate a comprehensive, citywide transit network as originally outlined in its now defunct Thirty Year Plan. (Since the time when alternatives were formulated, the MTA has rescinded the Thirty Year Plan and replaced it with a scaled down Long Range Plan. The new Long Range Plan is based on considerably lower projections of revenue for rail construction, bus improvements, and transit operations.) The Transit Buildout Alternative assumes that the City of Los Angeles will be able to absorb additional population, employment, and housing growth based on the greater capacity of the transit system. Compared to the

Framework Element, the alternative assumes 39% greater population, 136% greater employment, and 37% greater housing.

2. Impacts

Due to the Transit Buildout Alternative's overall greater development and growth as compared to the Framework Element, impacts would be greater for solid waste management, wastewater resources, water resources, utilities, flood control and drainage, transportation, fire/EMS, police protective services, education, libraries, recreation and open space, cultural resources, public health, geologic conditions/seismic safety, air quality, noise, and risk of upset. Because the Transit Buildout Alternative would result in a greater percentage of new rental units affordable to very low, low, and moderate income groups than under the Framework Element, the impacts would be less for housing and population. Due to the greater number of centers, districts, and boulevards proposed under this alternative, the impacts on land use and urban form would be greater. Because the placement of additional centers, districts, and boulevards around transit stations would not result in a direct increase in impacts to the City's natural habitats, the Transit Buildout Alternative's biological impacts are similar to those of the Framework Element.

3. Feasibility

The Transit Buildout Alternative is infeasible because the greater levels of population, employment, and housing would produce environmental effects significantly more adverse than the Framework Element. The Transit Buildout Alternative is furthermore infeasible because the permitted levels of population, employment, and housing are insupportable given current and planned levels of infrastructure and transit services.

D. <u>2010 MARKET ALTERNATIVE</u>

1. Description

The 2010 Market Alternative assumes that the City of Los Angeles will grow as forecast by SCAG, as driven by the marketplace, and as constrained by the policies of the existing set of adopted community plans. The 2010 Market Alternative assumes the same level of population and housing growth as the Framework Element. However, the 2010 Market Alternative assumes 8% less citywide employment than the Framework Element, consistent with the SCAG baseline forecast. Because the basis of this alternative's land uses are the existing community plans, the alternative results in a different physical distribution of land uses than the Framework Element. Development would be more dispersed and automobile oriented under this alternative and not as concentrated in transit- and pedestrian-oriented centers, districts, and mixed-use boulevards.

2. Impacts

Compared to the Framework Element, the impacts of the 2010 Market Alternative would be greater for land use, urban form, transportation, biological resources, and air quality. Because the 2010 Market Alternative lacks quality development standards and policies that encourage development in centers, districts, and mixed use boulevards, the City's current dispersed and automobile-oriented land use and urban form pattern would continue, perpetuating a negative existing situation. The 2010 Market Alternative's lack of pro-active transportation improvement and

mitigation strategies, and lack of policies which encourage a mode shift from the automobile to transit, walking, and the bicycle, result in greater transportation and air quality impacts than the Framework Element, even though the Framework Element includes a somewhat greater level of economic development. Because growth would not be encouraged to locate in centers, districts, and mixed use boulevards, the 2010 Market Alternative's impacts on open space and biological resources would be greater, as a larger share of development would occur on privately owned open space lands, many of which are the habitat for rare or endangered biological resources.

Due to overall less economic growth, the 2010 Market Alternative's impacts would be less for solid waste management, wastewater resources, water resources, utilities, fire/EMS, cultural resources, and risk of upset. Because the Framework Element and the 2010 Market Alternative have equivalent levels of population and housing, the impacts would be the same or similar for housing and population, police protective services, education, libraries, recreation, and public health.

The lesser amount of development contemplated under the 2010 Market Alternative would typically result in less paving and construction on permeable surfaces, thus resulting in less flood control and drainage impacts. But because development under the 2010 Market Alternative would be more dispersed and not as focused in selected centers, districts, and mixed use boulevards, more open space would be developed. By contrast, the Framework Element encourages growth to locate in centers, districts, and mixed use boulevards. Thus, the impacts of the additional development called for in the Framework Element on flood control and drainage is offset by the targeted growth policy. Consequently, the impacts of the 2010 Market Alternative would expose a similar number of additional persons to the City's geologic and seismic hazards as the proposed Framework Element, the Final EIR concludes that the impacts are similar.

Finally, even though there would be less development under the 2010 Market Alternative, the lack of transit- and pedestrian-oriented land use patterns would contribute toward increased levels of vehicular traffic noise. Conversely, while the Framework Element permits a greater level of economic development, the noise impacts of this additional increment of growth would be offset by the Framework Element's pedestrian- and transit-oriented development policies. Therefore, the Final EIR concludes that this alternative would likely generate noise impacts similar to those of the Framework Element.

3. Feasibility

The lack of pro-active transportation improvement and mitigation measures and a targeted growth policy which encourages pedestrian- and transit-oriented land uses in selected centers, districts, and boulevards would contribute toward transportation and air quality impacts that would actually be greater than the Framework Element, even though the Framework Element assumes, as a matter of policy, a greater number of jobs. The 2010 Market Alternative is economically infeasible because the lower levels of employment would generate significant deficits in the City's annual budget, contributing to reduced levels of public services, including police and fire protection.

E. <u>THEORETICAL BUILDOUT ALTERNATIVE</u>

1. Description

The Theoretical Buildout Alternative assumes buildout of the Framework Element without land use and managed development policies linking growth with infrastructure capacity. Under this alternative, there would be no trigger mechanisms available to generate additional review when infrastructure improvements are not able to keep up with the demands placed on them by new development.

2. Impacts

Due to the Theoretical Buildout Alternative's overall greater development and growth as compared to the Framework Element, impacts would be greater for land use, solid waste management, wastewater resources, water resources, utilities, flood control and drainage, transportation, fire/EMS, police protective services, education, libraries, recreation and open space, cultural resources, geologic/seismic conditions, air quality, noise, and risk of upset.

Because the Theoretical Buildout Alternative would result in a greater percentage of new rental units affordable to very low, low, and moderate income groups than under the Framework Element, the impacts would be less for housing.

Because under both the Framework Element and the Theoretical Buildout Alternative growth would be encouraged to locate in centers and districts rather than open space lands that are the habitat for rare or endangered biological resources, the impacts on open space and biological resources would be similar.

3. Feasibility

The Theoretical Buildout Alternative is infeasible because the greater levels of population, employment, and housing would produce environmental effects significantly more adverse than the Framework Element. The Theoretical Buildout Alternative is furthermore infeasible because the permitted levels of population, employment, and housing are insupportable given current and planned levels of infrastructure and transit services.

F. <u>ENVIRONMENTALLY SUPERIOR ALTERNATIVE</u>

Among the six alternatives considered, the Framework Element is the environmentally superior alternative for the following reasons:

- 1. The No Project, Theoretical Buildout, and Transit Buildout (A1) Alternatives all permit greater levels of population, employment, and housing than the Framework Element, and furthermore do not include policies for managing growth and development in relationship to infrastructure capacity. The greater amounts of permitted population, employment, and housing would result in more significant adverse environmental impacts than the Framework Element.
- 2. The No Growth Alternative's moratorium on all new commercial and residential development would not be successful in restricting population growth, particularly in light of SCAG's 2010 growth forecast which suggests that 67% of the projected increase in population will be due to natural increase (the excess of births

over deaths) rather than net in-migration. In addition, the No Growth Alternative would not prevent regional growth. It is also likely that some or all of the growth that would otherwise locate in Los Angeles would be pushed to adjacent communities, and from there would still generate negative air quality and transportation impacts affecting residents of the City. The development moratorium would, however, drastically reduce employment opportunities and City revenue during a time when a growing population would place added demands on public services and infrastructure systems. While the No Growth Alternative would result in overall fewer adverse environmental effects, these are outweighed by the reduced quality of life that would result from constricted employment opportunities and underfunded public services. The No Growth Alternative would disproportionately affect those areas of the City affected by the 1994 Northridge Earthquake and the 1992 civil disturbances.

- 3. The 2010 Market Alternative lacks the public policy interventions necessary to correct structural deficiencies in the city's mix of land uses and its urban form pattern which contribute to poor air quality and traffic congestion. Without a change in policy which emphasizes transit- and pedestrian-oriented development concentrated in centers, districts, and mixed-use boulevards, a mode shift from the private automobile to transit and walking will not occur. Even though the 2010 Market Alternative would result in less employment growth, the effects on air quality and transportation are greater than the Framework Element's because an automobile-oriented pattern of development policies, the employment opportunities and public services dependent on a healthy economic base would be reduced. The 2010 Market Alternative would also be less successful at protecting the character of low-density residential neighborhoods because it contains no policies for encouraging growth to occur in centers, districts, and mixed use boulevards.
- 4. None of the alternatives fulfill the central objectives of the Framework Element. The No Project and Theoretical Buildout Alternatives permit development to exceed adequate infrastructure levels, contributing to reduced air quality and transportation impacts, in an automobile-oriented land use and urban form pattern that disperses development, thus endangering the character of low-density residential neighborhoods. These alternatives further lack policies that encourage quality development, walking, and transit use. The No Growth Alternative perpetuates a negative existing automobile-oriented pattern of land use and urban form, while reducing employment opportunities needed to revitalize economically disinvested neighborhoods and the revenue needed to provide adequate infrastructure. The 2010 Market Alternative also perpetuates a negative existing automobile-oriented pattern of remaining alternative also perpetuates a negative existing automobile-oriented pattern form, and provides inadequate employment opportunities given the level of projected population and housing.

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS

The Council of the City of Los Angeles finds that the unavoidable significant project-specific effects, any potentially significant project-specific adverse effects on air quality (ROG, NOx, SOx) and transportation due to the infeasibility of the TIMP and FEIR mitigation measures, and the unavoidable cumulative adverse environmental effects of the growth accommodated in the Framework Element are acceptable when balanced against the Framework Element's social, economic, and other benefits as described below:

A. The adverse impacts identified in the Environmental Impact Report are substantially the impacts of growth which is projected to occur with or without the Framework Element, not the impacts of implementing the

plan. While the General Plan Framework Element does not advocate this level of growth, should it occur the implementation of the Framework Element functions as mitigation for that growth. It provides the City with policies and mechanisms which will allow the City to manage the growth that occurs and to substantially reduce the impacts to the maximum extent feasible. Although there are still significant and unavoidable impacts derived from this growth, implementation of the policies and programs of the Framework Element will have fewer and less severe impacts than any other reasonable alternative.

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- B. The Framework Element strengthens the City's role as the hub of the regional transportation network by providing a comprehensive array of transportation mitigation measures that enhance regional access to jobs located in the City, enhance mobility on City streets, arterials, and freeways, focus transit improvements in the City, and provide for ridesharing, transportation demand management, and transportation systems management programs that increase the efficiency of the City's transportation network relative to the rest of the region. The Framework Element, along with the Transportation Improvement and Mitigation Program (TIMP), includes policies and programs designed to provide the transportation network with adequate capacity to accommodate forecasted and planned growth, including mechanisms to monitor and maintain acceptable mobility.
- C. The Framework Element and TIMP enhance the City's effectiveness in competing for state and federal transportation infrastructure funding in the following ways:

Through its land use policies, the Framework Element reflects the Land Use/Transportation Policy endorsed by the LACMTA Board in 1994 and is fully congruent with the livable cities and smart growth initiatives of SCAG, the state of California, and the federal government.

Through the TIMP and its analysis the Framework Element enables the City to more strategically plan transportation investments based on its congested corridor focus and its integrated toolkit of transportation improvements and programs, thereby maximizing the City's returns on transportation investments.

- D. The Framework Element strengthens the City's economic base, providing expanded employment opportunities for City residents, especially those who live in economically disinvested neighborhoods, by providing a comprehensive array of economic development goals, objectives, policies, and programs that will serve to maintain the City's 1990 ratio of jobs to housing through the year 2010.
- E. The Framework Element includes measures to streamline the City's development approval process, thus making it easier for businesses to locate in the City. An expanded economic base will greatly assist the City in its efforts to secure the revenues necessary to provide public services essential to maintaining the quality of life in Los Angeles and to attract new and retain existing businesses.

- F. The Framework Element protects the character of single-family and other low-density residential neighborhoods by encouraging growth to locate in centers, districts, and mixed use boulevards with a sense of place and identity that respond to the unique cultural and other needs of surrounding communities.
- G. The Framework Element encourages the creation of pedestrian amenities in centers, districts, and mixed use boulevards and improves the quality of life in multi-family residential neighborhoods through quality development standards.
- H. The Framework Element encourages the creation of a citywide greenways network that would connect existing parks, major recreational areas, and landscaped median strips. Existing rail rights-of-way and drainage channels would be landscaped and also connected to the greenways network. The Framework Element includes measures that encourage the provision of additional recreational facilities and open space areas within centers, districts, and mixed-use boulevards through the use of school yards as parks, small urban parks developed with mixed-use structures, and community facilities.
- I. The Framework Element revives and improves the City's commercial districts through incentives and development standards that encourage the quality development of boulevards with mixed residential/commercial development, institutional, office/retail and other land uses oriented towards walking and transit use.
- J. The Framework Element provides sufficient capacity to accommodate the future housing needs of the City, providing incentives for a variety of different housing types, including mixed use residential and commercial development, for a culturally and economically diverse population.
- K. The Framework Element promotes the goal of adequate infrastructure systems and public services through a policy that seeks to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and public services.
- L. The Framework Element reduces air quality impacts by as much as 13% from what would otherwise occur under the policies established in the existing set of adopted community plans. These reductions are accomplished through an integrated set of land use and transportation policies, including mixed use development, that discourage single-occupancy automobile use and encourage use of alternative travel modes, including ridesharing, transit, walking, and bicycle use.
- M. The Framework Element is an environmentally superior alternative from a regional perspective. The City of Los Angeles is in a better position to accommodate regional growth than outlying, underdeveloped areas of Southern California, for the following reasons:

One, the City of Los Angeles has a more developed transit infrastructure than any other city or area in the region. The City of Los Angeles is the site for a greater share of Metro Rail and other transit improvements than any other city or area in the region. This transit infrastructure provides greater opportunities for a mode shift from the private automobile to transit than areas of the region where alternatives to automobile use are not as available, or, in some cases, non-existent.

Single-occupant automobile trips and associated traffic congestion and air pollution would be reduced.

Two, growth in the City of Los Angeles reduces costly and environmentally destructive regional urban sprawl. Los Angeles has a significant inventory of urban in-fill sites that can accommodate additional growth without as substantial and as expensive of infrastructure investments as would be required to provide public services to presently underdeveloped areas of the region.

Three, growth in the City of Los Angeles helps reduce regional open space impacts to the extent that growth is diverted away from desert, agricultural, and other open space areas to already urbanized areas.

N. The General Plan Framework policies, along with the Framework EIR mitigation measures where appropriate and feasible, will reduce potential significant impacts to levels of insignificance or will substantially lessen or avoid those impacts; in addition, the City will continue to require project-level environmental reviews of individual development projects pursuant to the City's CEQA Guidelines and to enforce zoning and building code compliance as a condition of building permit issuance.

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•	Citywide General Plan Framework Element (GPF)	CF 01-1162 95-2259
ROJECT DESCRIPTION AND The GPF is a of the Land	D LOCATION broad policy document which sets a citywide context to Use Element (community plans) and other citywide element	guide updates nts
C. ACT PERSON	STATE CLEARING HOUSE NUMBER	TELEPHONE NUMBER
Michael F.	Davies 940071030	(213) 978-1366
as approved the above SIGNIFICANT	described project and has made the following determinations: Project will have a significant effect on the environment.	of the City of Los Angeles
EFFECT	Project will not have a significant effect on the environment.	
MITIGATION	Mitigation measures were made a condition of project approved Mitigation measures were not made a condition of project app	al. proval.
OVERRIDING CONSIDERATION	Statement of Overriding Considerations was adopted. Statement of Overriding Considerations was not adopted. Statement of Overriding Considerations was not required.	
ENVIRONMENTAL IMPACT REPORT	 An Environment Impact Report was prepared for project and may be examined at the Office of the City Clerk.* An Environmental Impact Report was not prepared for the project. 	
NEGATIVE DECLARATION	A Negative Declaration or Mitigated Negative Declaration was and may be examined at the Office of the City Clerk.*	prepared for the project
	A Negative Declaration or Mitigated Negative Declaration was not prepared for the project.	
GNATURE S	City Planner	DATE OF PREPARATION
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