
LOS ANGELES COUNTY CONGESTION MANAGEMENT PROGRAM

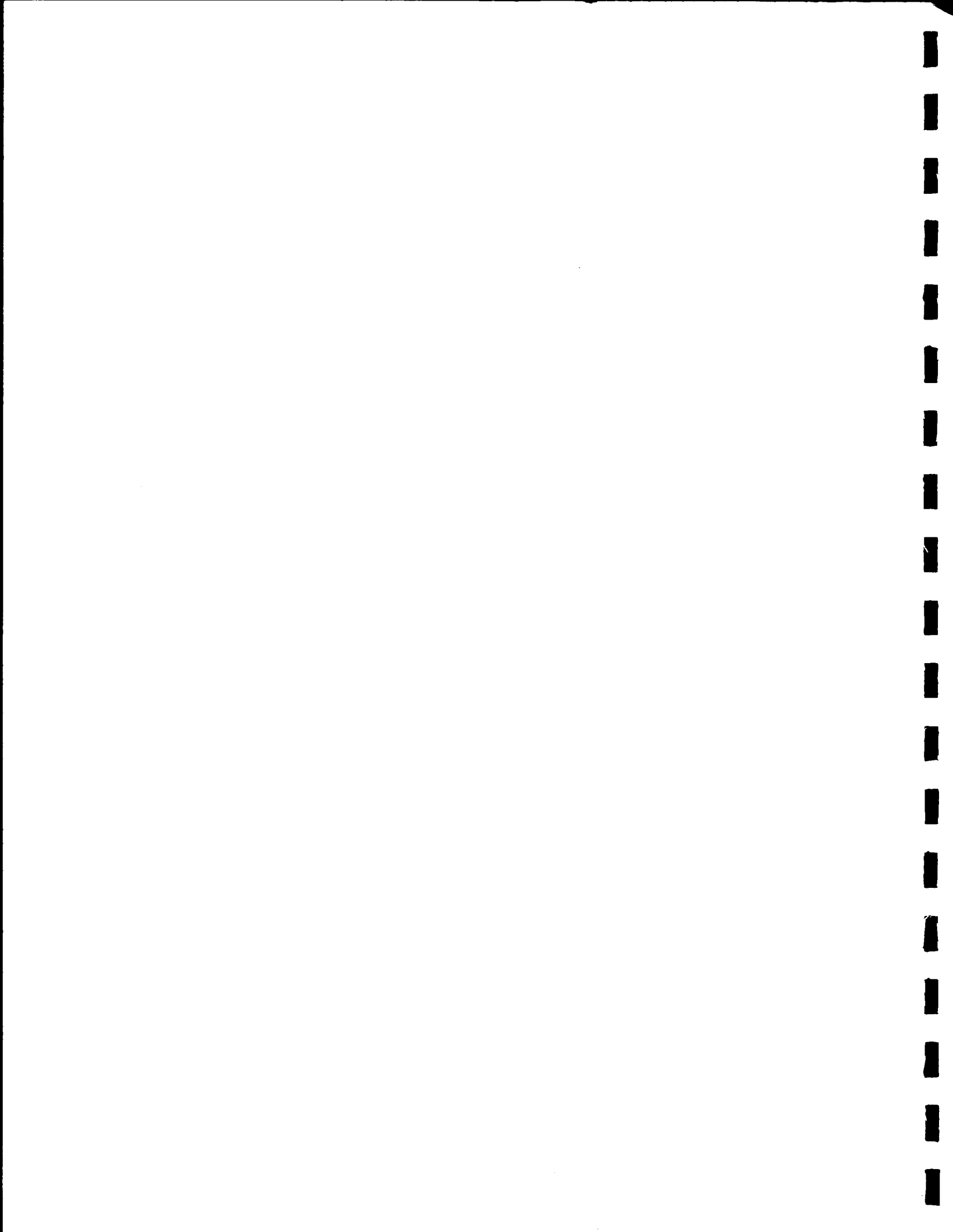
**Final Environmental Impact Report
Certified, November 1992**

SCH # 91121063
SCAG Clearing House # LA-55791-MT

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NOTE TO READER

On November 18, 1992 the Los Angeles County Transportation Commission certified as Final this EIR and adopted the 1992 Los Angeles County Congestion Management Program. The Final EIR incorporates the as part of the Appendices the staff report to the November 18, 1992 staff report to the LACTC Board, the Response to Comments on the DEIR, the adopted Statement of Findings and Facts in Support of Overriding Considerations, and the adopted Mitigation Monitoring Program.

The Final EIR has been annotated to incorporate revisions made as a result of the Response To Comments on the DEIR. The attached ERRATA notes list these changes. Notations have been made directly in the text referring the reader to the ERRATA notes where appropriate.

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ERRATA NOTES

1. Pages S-19 and 125-126: The second bullet item under mitigation measure G.1 is amended to read:

"Site-specific studies are required for each CMP capital improvement project located in the vicinity of an SEA, or in any area identified as potentially environmentally significant by the local jurisdiction, to determine whether significant plant or animal life or plant or animal life protected by local ordinance is present in a proposed alignment, and the level of impact on those resources. In consultation with the California Department of Fish and Game, the U.S. Fish and Wildlife Service and the local jurisdiction in which the project is located, detailed biological surveys are conducted prior to the adoption of roadway alignments which have the potential to adversely affect significant or protected biological resources."

2. Pages S-23 and 136: The fifth bullet item under mitigation measure H.1 is amended to read:

"The environmental assessment adequately evaluates the potential for significant impacts to nearby historic resources, including locally designated resources, and includes appropriate mitigations."

3. Pages S-24 and 143: A third bullet item is added under mitigation measure I.1 to read:

"•An assessment of the potential impacts to schools is included in the environmental assessment of any CMP capital improvement project to be located in proximity to a school, which includes an assessment of traffic, noise, and access impacts."

4. Page S-29: The first sentence of paragraph 3 is amended to read:

"Although the TDM Intensive Alternative is environmentally superior to the other alternatives, it does not meet the project goals, unlike the CMP which provides a balance of TDM and capital improvements necessary to meet mobility needs."

5. Page 9: Figure 2- The outline of Culver City between the 405 freeway and Marina Place is located further downward than is displayed in this figure.

ERRATA NOTES

6. Page 17: Paragraph 2 - The following fifth and sixth sentences are added (following the sentence referencing Figure 5):

"This figure shows the portions of the County's highway network currently experiencing LOS E or LOS F. The Figure indicates the direction of travel in which congestion is experienced and the relative length of the period of congestion expressed in the band width."

7. Page 25: Table 4 - The reference to "Glendale Ave." is changed to read:

"Glendale Blvd."

8. Page 37: Paragraph 3, first line - The reference to "land miles" is corrected to read:

"lane-miles."

9. Pages 40-41: The last sentence is amended to read:

"The General Plan is considered the constitution for all future developments within the city or county to which any local discision affecting land use and development must conform."

10. Page 51: The second paragraph is amended to read:

"In addition to these facilities, major construction projects are on-going. The following facilities are currently under construction:

I-210 (Foothill Freeway) HOV lane
I-105 (Glen Anderson Freeway): Norwalk to El Segundo
I-110 (Harbor Freeway) Transitway
I-405 (San Diego Freeway) HOV lane
U.S. 101 (Ventura Freeway) widening project"

11. Page 74: Figure 16 - The vertical Y axis label shall be amended to read:

"Maximum 1-Hour Concentration in ppm"

12. Page 76: First paragraph - The last sentence (beginning with "TSP levels...") is deleted in its entirety.

13. Page 78: Table 13 - is amended to read:

"1A. Alternative Work Schedules and Locations - TDM Optional List
1B. Non-Motorized Transportation - TDM Model Ordinance"

ERRATA NOTES

14. Page 78: Table 13 - is amended to read:

"8. Airport Ground Access - CIP-Rail Improvements and CIP Arterial System Improvements"

15. Page 89: Fourth paragraph - The following sentence is added at the beginning of the paragraph:

"The general description of the geology setting of Los Angeles County has been excerpted from the Los Angeles County Safety Element (December 6, 1990)."

16. Page 93: Fourth line - The word "rapture" is corrected to:

"rupture"

17. Page 122: Table 22 - The reference to "Ballons Creek" is corrected to read:

"Ballona Creek"

18. Page 125: First paragraph - The following sentence is added at the end of the paragraph:

"In addition, individual CMP CIP projects may have the potential to impact biological resources identified as significant in local General Plans or protected by local ordinances. In addition, a number of local jurisdictions have included a discussion of biological resource issues in their General Plans, or have adopted local ordinances for the preservation and protection of specific species or plant or animal communities. For example, the preservation of oak trees is a major issue in many communities."

19. Page 129: First paragraph - The reference to "Appendix D" is corrected to read:

"Appendix E"

20. Page 131: Third line - The reference to "Appendix D" is corrected to read:

"Appendix E"

ERRATA NOTES

21. Page 131: First paragraph - The following paragraph is added after the third line:

"Other Local Jurisdictions

In addition to the City of Los Angeles, a number of other local jurisdictions have designations for historic districts, structures and places of importance. The list of designated structures for several local jurisdictions is contained in Appendix E of this document."

22. Page 138: Second paragraph - The last sentence is amended to read:

"The U.S. Forest Service provides fire protection for all national forest lands within the County and the County Fire Department serves the northeastern area of the County."

23. Page 140: Table 24 - The following park is added:

"Media Park Culver City"

24. Page 147: Table 25 is corrected to indicate that employment in the Southern California Region:

"Would increase to 8.9 million by the year 2010"

25. Page 174: Third paragraph - The first sentence is amended to read:

"Although the TDM Intensive Alternative is environmentally superior to the other alternatives, it does not meet the project goals, unlike the CMP which provides a balance of TDM and capital improvements necessary to meet mobility needs."

26. Appendix E: Lists of historic structures located in the cities of Culver City and Glendale are added to Appendix E.

27. Appendix F: Page F-5 -McManus Park is corrected to read:

"Syd Kronenthal Park"

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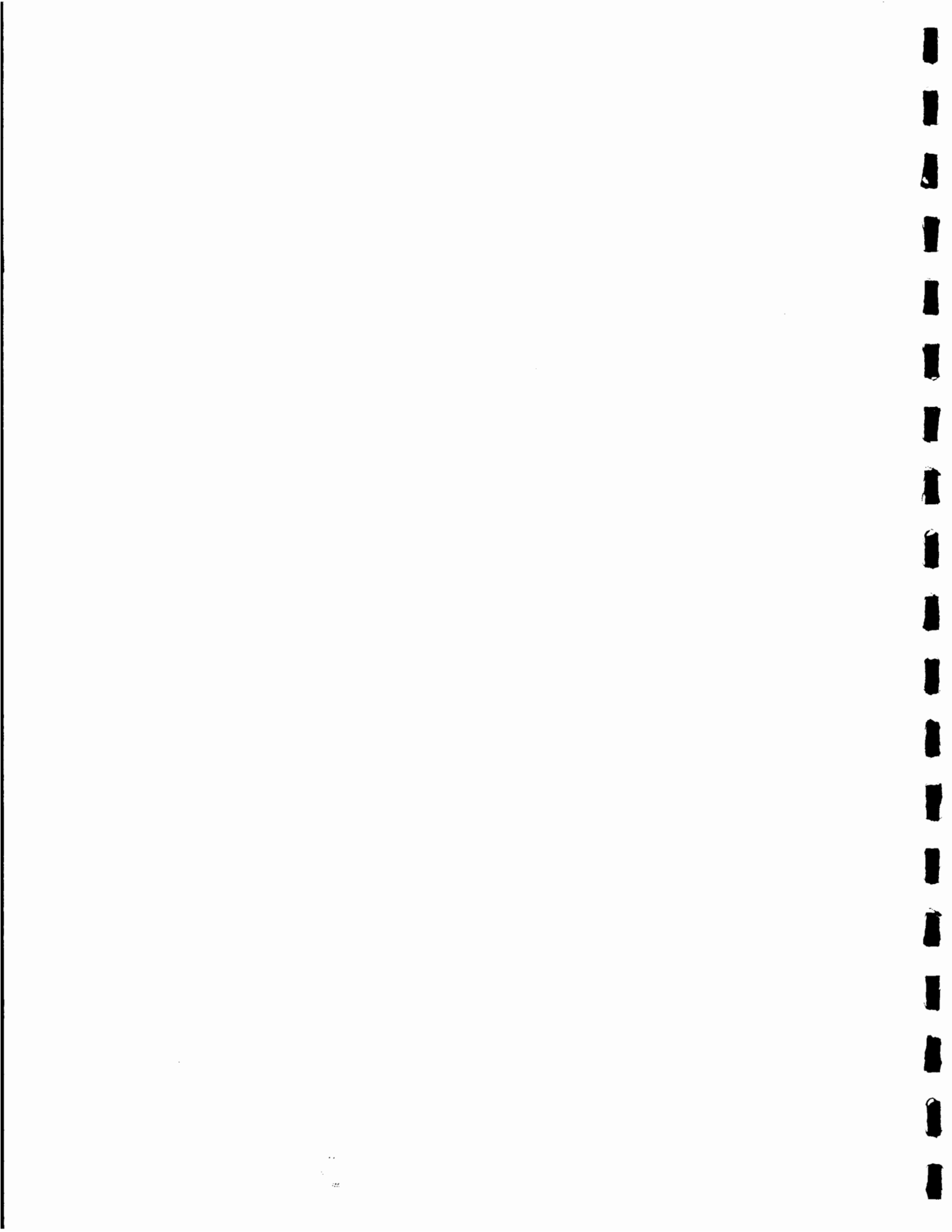
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S. SUMMARY

A. PROJECT DESCRIPTION

The following Environmental Impact Report (EIR) analyzes the potential of the 1992 Congestion Management Program (CMP) for Los Angeles County to create significant environmental impacts. This assessment fulfills the requirements of the California Environmental Quality Act (CEQA) and is designed to inform decision-makers, other responsible agencies and the general public of the proposed action and the range of potential environmental impacts of that action. The EIR also analyzes alternatives to the proposed CMP and recommends a set of measures to mitigate any potentially significant adverse impacts identified in the EIR. The Los Angeles County Transportation Commission (LACTC), the Lead Agency for the CMP EIR, will use this EIR in their review prior to adopting the 1992 CMP.

The CMP is a new program mandated by State Government Code Sections 65088, et. seq., adopted in June of 1990. The intent of the program is to provide a mechanism for linking regional mobility with local land use decisions while working toward improved air quality. By statute, the LACTC was given a one year extension to adopt the CMP, because it was determined that an EIR was necessary. In accordance with this extension, the LACTC must adopt its CMP by December 1, 1992.

In accordance with Section 65089(b) of the Government Code, the CMP contains the following five elements:

1. An element designating the CMP transportation system and establishing Level of Service (LOS) standards for the highways and roadways included in that system.
2. A transit standards element for service frequency, routing, and coordination among multiple transit agencies operating with the CMP's jurisdiction.
3. A transportation demand and trip reduction element that includes alternatives to single-occupant auto use and promotes strategies to manage overall travel demand.

4. A land use program to analyze the impacts of land use decisions by local jurisdictions on the regional transportation system.
5. A seven-year capital improvement program (CIP) to maintain or improve the traffic and transit standards or to mitigate the impact of new development.

B. ENVIRONMENTAL ANALYSIS

The major environmental impacts and suggested mitigation measures are summarized in Table S-1. Appendix A contains a list of acronyms used in the summary and throughout this document.

C. ALTERNATIVES TO THE PROJECT

This EIR includes an analysis of four alternatives to the proposed CMP. The first two alternatives are no project alternatives. They are included because CEQA mandates the discussion of a no project alternative in an EIR¹ and because they serve to highlight the effects of CMP adoption. Alternative 1 is the no change from existing conditions version of the no project alternative and Alternative 2 is the non-adoption of a CMP version of the no project alternative. Neither of these alternatives would comply with the requirements of the CMP statute and are therefor not considered feasible.

The other two CMP alternatives are a TDM intensive alternative and a capital intensive alternative. Each of these alternatives has been designed to be consistent with the adopted RMP. In adopting the RMP, SCAG analyzed five alternatives to the RMP.² Those five alternatives are described below.

- **RMP Alternative 1 - The No-Project Alternative.** This alternative consisted of the 1987 existing transportation system and construction of the transportation system improvements funded as of 1987. This alternative was designed to be analogous to the potential impact of

¹ See CEQA Guidelines, section 15126, subd. (d)(2).

² Please see Chapter 6 of the Draft EIR for the Regional Mobility Plan (State Clearinghouse number 87-121613) previously incorporated herein by reference.

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES

S-3

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
A. LAND USE		
<u>Direct Impact:</u> Individual CMP projects may result in localized changes in land use.	A.1 The LACTC shall consult with other adjacent CMAs in reviewing LOS standards to ensure that differences in LOS standards between counties do not encourage a land use pattern which is inconsistent with local land use or regional goals.	Less than significant.
<u>Indirect Impacts:</u> Should implementation of the CMP result in increased urban deconcentration or concentration or expansion development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on land use.	A.2 The LACTC shall participate in on-going forums, regarding interjurisdictional impacts including land use issues and impact analysis procedures.	Less than significant.
Increasing system capacity may encourage additional trips (latent demand) on the system, by reducing the costs (time and stress) associated with trip-making.	A.3 The LACTC shall investigate the use of other mobility and system performance indices such as Vehicle Miles Traveled and Average Vehicle Ridership and shall compare the effectiveness of such indices with LOS as standards for determining both system mobility and motor vehicle emissions performance. These supplemental measures shall be incorporated into the program if determined to be effective for reconciling localized decreases in service against regional improvements.	Less than significant.

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p><u>Direct Impacts:</u> The following classes of CMP CIP projects could lead to the localized displacement of adjacent businesses and residences: Class 1 - freeway system management (specifically the construction of HOV lanes); Class 2 - freeway gap closures; Class 6 - rail improvements; Class 4 - commuter rail stations; transit centers and park-n-ride lots; and, to a more limited degree, Class 3 - arterial system improvements. Of the 1992 CIP projects (see Table 5) Class 2 and 3 projects present the greatest potential for disruption.</p>	<p>A.4 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the land use impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations.</p>	<p>Less than significant.</p>
<p>The CMP's Land Use Analysis Program, in combination with CMP network monitoring and modeling should provide better information on which local jurisdictions can base their analysis.</p>	<p>None required.</p>	<p>Beneficial Impact</p>
<p><u>Indirect Impacts:</u> The CMP's TDM component may result in increased density in the vicinity of transit centers and rail facilities. This would be supportive of the centers development goals of a number of local jurisdictions.</p>	<p>A.5 The LACTC shall explore with the cities the desirability of including mechanisms in the CMP for encouraging the creation of increased density in targeted centers areas. Possible mechanisms include specification of density related CIP project selection criteria; inclusion of density encouraging mechanisms in the TDM component of the CMP; or inclusion of mechanisms to encourage targeted density development as a component of future deficiency planning.</p>	<p>Less than Significant</p>

S-4

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
B. TRANSPORTATION		
<u>Direct Impact:</u> The CMP has been designed to be consistent with the RMP, thus the CMP should have a positive impact on working towards attainment of Regional Mobility goals.	None required.	Significant Beneficial Impact
<u>Direct Impact:</u> Any potential impacts of the highway and roadway element of the CMP are likely to be related to the implementation of the specific CIP improvement projects within the framework of the CMP process. CIP projects will help to maintain LOS.	Mitigation measure A.4 would mitigate the direct effects of the CIP element of the CMP.	CIP projects will have a beneficial impact County-wide on LOS. The potential for localized CMP CIP project specific traffic impacts to remain after implementation of CIP project specific mitigations developed as part of CIP project specific environmental review can only be assessed on a project specific basis.
Traffic may be re-routed during the construction of a particular facility. It is possible that the implementation of a transportation improvement project may cause traffic to be diverted into or through sensitive areas including residential neighborhoods, creating localized noise or air quality impacts.	B.1 The LACTC shall review EIRs for CIP projects to ensure that mitigation measures are included requiring that the Lead Agency give transit operators and affected City Departments of Transportation advanced notice of construction activities which might impact the transportation system.	
Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on the	Mitigation Measures A.1 - A.3 would mitigate the indirect effects of the CIP element of the CMP; mitigation measures A.1 - A.3 and mitigation B.1 would mitigate the indirect effects of the CMP Highway and Roadway System element.	Less than significant.

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p>transportation system by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.</p>	None Required	Beneficial Impact
<p><u>Direct Impact:</u> The Highway and Transit Elements would provide monitoring information to assist in planning.</p>	None Required	Beneficial Impact
<p>C. AIR QUALITY</p>	None Required	Significant Beneficial Impact
<p><u>Direct Impact:</u> The CMP conforms with the AQMP and would help to improve regional air quality in the County</p>	None Required	Significant Beneficial Impact

S-6

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p><u>Direct Impact:</u> The construction and/or operation of CIP transportation improvement projects could have the following localized negative air quality impacts adjacent to the improvement alignment or right-of-way:</p> <ul style="list-style-type: none"> • Construction of roadway and/or transit improvements would have short-term construction impacts. Earth moving activities would increase localized particulate levels. Improvements to existing roadways may also require detours and delays during construction which would cause short-term increases in emissions. • New route locations or freeway gap closures have the potential to bring mobile emission sources closer to existing sensitive land uses as well as create new line sources of pollutant emissions in areas where such sources may not have existed before. • Providing increased roadway capacity by widening or re-striping may move vehicle travel lanes closer to sensitive land uses adjacent to the roadway. 	<p>In addition to mitigation measure B.1, the following mitigation measures would partially mitigate direct impacts associated with CMP CIP projects:</p> <p>C.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the air quality impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • preparation in accordance with applicable guidelines (SCAQMD, CALTRANS, FHWA, EPA etc.); • both construction and operation phase emissions and criteria pollutant concentrations, and compare emissions and concentrations to established SCAQMD daily emissions thresholds, as well as to California Ambient Air Quality Standards (CAAQS); • consistency with the Air Quality Management Plan; 	<p>The potential for localized CMP CIP project specific air quality impacts to remain after implementation of the mitigations and CIP project specific mitigations developed as part of CIP project specific review can only be assessed on a project specific basis.</p>

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<ul style="list-style-type: none"> Creation of rail transit stations and transit centers has the potential to attract a significant number of vehicles to parking locations. Particularly during peak periods, localized carbon monoxide "hot spots" may be created by vehicles idling or queuing at access points to parking facilities. Station circulation may also impeded vehicle flow on adjacent arterial streets and this increase delays, idling and localized emissions. 	<ul style="list-style-type: none"> demonstration that significant air quality impacts have been mitigated in a manner consistent with the provisions of applicable State and Federal clean air legislation. 	
<p>Indirect Effects: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on air quality by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.</p>	<p>C.2 The LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(1) of the Street and Highways Code for highway landscaping and urban forestry projects designed to offset vehicular emissions of carbon dioxide associated with CIP projects.</p> <p>C.3 The LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional goals will be proposed in consultation with local, regional, and state agencies.</p>	Less than Significant.

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p>CMP-related improvements could potentially increase the density of trips and traffic in center areas such as near transportation centers, rail transit stations, park and ride lots, etc. In these cases, the air quality affect of the CMP could create "hot spots" of pollutant concentrations, particularly carbon monoxide.</p>	<p>C.4 The LACTC shall encourage and participate in the evaluation and reconciliation of localized adverse impacts with regional improvements. Such evaluation is intended to broaden the understanding of "hot spots" of pollutant emissions, and the tradeoffs between hot spot creation and regional emission reductions.</p>	<p>Less than Significant</p>
<p>D. NOISE</p>	<p>D.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the noise impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • preparation in accordance with applicable local and State guidelines (FHWA FHMP 773, State Office of Noise Control, local noise ordinance and general noise element, etc.) 	<p>The potential for localized CMP CIP project specific noise impacts to remain significant after implementation of the mitigations and CIP project specific mitigations developed as part of CIP specific review can only be assessed on a project specific basis.</p>
<p>6.9 Noise from the construction of CIP projects may be disruptive. Circumstances where noise conditions may increase and adverse impacts may result including the following:</p> <ul style="list-style-type: none"> - Construction of new routes or freeway gap closures through sensitive residential areas. - Widening of facilities on the existing CMP highway network that would bring travel lanes and mobile noise sources closer to sensitive adjacent land use receptors. - Construction of elevated HOV lanes or elevated rail transit within or adjacent to facilities passing through residential areas or adjacent to sensitive land uses. 		

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

S-10

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<ul style="list-style-type: none"> - Operational improvements on the CMP network that would increase traffic speed and flow that may incremental increase noise levels. - Increase in the frequency of transit service (bus and/or rail) would increase Community Noise Equivalent Levels (CNEL). - New transit alignments or the construction of new elevated transit facilities would increase ambient noise levels. - New transit stations may cause an increase in mobile and stationary levels for adjacent land uses. - New park-and-ride locations may cause an increase in mobile noise levels for adjacent land uses as a result of a significant increase in vehicle trips to the area. Stationary noise levels may also increase as a result of the construction of parking structures with ventilation systems or from parking areas where sounds such as engine run-ups, door slams, car alarms etc. would be more common. 	<ul style="list-style-type: none"> • demonstration that all significant noise impacts have been mitigated in a manner consistent with the provisos of applicable local ordinances, as well as State and Federal guidelines. 	

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p><u>Indirect Effects:</u> Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on noise by increasing traffic in areas with relatively low background noise levels. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible. Also a possibility is that CMP-related improvements could increase the density of trips and traffic in center areas such as near transportation centers, rail transit stations, park-and-ride lots, etc. In these cases, the noise effect of the CMP could concentrate an increase in both mobile and stationary noise levels in the immediate vicinity of these new facilities.</p>	<p>Mitigation measure C.3 addresses indirect noise impacts.</p>	<p>Less than significant.</p>

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p>E. GEOLOGY</p>	<p>E.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the geological impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • preparation in accordance with applicable local and State guidelines (Caltrans, Division of Mines Geology, local ordinances). • adequate geotechnical investigations regarding grading, slope stability, seismic hazards, potential ground acceleration. • the appropriate level of coordination with the State Division of Mines and Geology and identify specific mitigation measures to be implemented. 	<p>The potential for localized CMP CIP project specific geotechnical impacts to remain after implementation of the mitigations and CIP project specific mitigations developed as part of CIP project specific review can only be assessed on a project specific basis. With mitigation, the CMP is not anticipated to result in any significant regional geotechnical impacts.</p>

Direct Effects: Construction of CIP projects could result in the following geotechnical impacts: construction related erosion; increased risk of slope failures, mudslides, and rock falls; a limited potential for subsidence or soil-related impacts; and seismic risks.

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p>S-13 <u>Indirect Effects:</u> Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, in closer proximity to active faults which has not been anticipated in the regional plans, the CMP could have a negative effect on seismic risk by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.</p>	<ul style="list-style-type: none"> • are designed in accordance with County and local code requirements for seismic ground shaking with special attention to the seismic design of bridges, elevated structures and tunnels. • demonstrate that all significant geotechnical factors have been mitigated in a manner consistent with the provisions of sound engineering practice and applicable local ordinances. <p>Mitigation measure C.3 addresses indirect geological impacts.</p>	<p>Less than Significant</p>

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p>Also a possibility is that CMP-related improvements could increase pressures for increased population and employment density in areas adjacent to transit stations, transit lines, transportation centers, etc. A new concentration of population and/or employment, particularly in multi-story buildings could increase human exposure seismic event risks.</p>		
<p>F. WATER</p>		
<p><u>Direct Impacts:</u> CIP projects could affect beneficial uses through the destruction of habitat and changes in surface water quality. Implementation of the CMP could have a short-term adverse effect on nearby surface water bodies during construction CIP related projects. these effects would include increased sedimentation engendered by excavation and grading activities, as well a pollution from vehicular oils and grease. Long-term impacts could result from increased highway and transit associated facilities operations and their associated pollution (such as vehicular oils and grease emissions). The level of pollution produced would be a function of the number and lengths of trips made on these new facilities.</p>	<p>F.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the water resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • For large-scale capital improvement projects, such as freeway, HOV, rail and interchange projects, appropriate ecologically-oriented maps are obtained and used during the planning process for CIP projects. Every effort is made to avoid areas that are currently used or are anticipated 	<p>With implementation of the mitigation measures, program level water resource impacts on beneficial uses, supply and demand, and water quality are not anticipated to be significant. The potential for significant adverse water resource impacts to remain after implementation of CIP project specific mitigations developed as part of CIP project specific environmental review, can only be assessed on a project specific basis.</p>

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TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
	<p>to be used for ecologically beneficial purposes. Every effort is made to minimize all disturbances in areas where construction is mandatory. All areas are restored to their original pre-construction condition, including the re-introduction of all uncontaminated soil and the replacement of all native vegetation. In the coastal zone, coastal zone planning and management programs reduce adverse impacts to coastal water quality and preserve or improve areas of special water quality significance such as bays and estuaries.</p> <ul style="list-style-type: none">• For large-scale CIP projects such as freeway, HOV, rail and interchange projects, a comprehensive site investigation is conducted by ecological and water quality specialists to provide input into the above planning and mitigation design process and to confirm expected onsite conditions prior to the initiation of demolition and construction activities.• Planning, construction, and operational activities are coordinated with appropriate ecological and water resources agencies and are conducted in accordance with the requirements of the Federal Water Pollution Control Act, the Water Quality Act and the Clean Water Act, including NPDES and Section 404 permit requirements.	

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

ENVIRONMENTAL IMPACT

MITIGATION

LEVEL OF SIGNIFICANCE AFTER MITIGATION

- Natural conditions are maintained or simulated wherever possible to minimize effects at stream crossing. Single-span bridges are used when feasible.
- Erosion control measures and runoff management, such as drainage channels, detention basins, and vegetated buffers, are employed to prevent pollution of adjacent water resources by runoff from transportation facilities. Wherever physically feasible, detention basins are equipped with oil and grease traps which are cleaned regularly. Treatment and disposal of excavated materials is well-planned.
- Water conservation measures listed in the BMP are incorporated into the planning and design of CIP projects and their mitigations.
- Use of permeable surfaces and channelization of flows to recharge areas are incorporated into project design, where possible, to promote water percolation and removal of metals.
- All demolition, construction, and operational activities are conducted in accordance with all applicable regulatory requirements.

Mitigation measure A.3 would reduce long-term water quality impacts associated with CIP project operation:

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p><u>Indirect Effects:</u> Should implementation of the CMP result in increased urban deconcentration or concentration or expansion of development in areas containing beneficial uses, significant indirect impacts could result.</p> <p>Deconcentration could also decrease the amount of open land that is currently available for ground water recharge, either through natural means or through use of reclaimed water. Efforts to foster reclamation projects to increase local ground water supplies could be significantly curtailed because of the area requirements associated with the reuse of treated effluent. Lastly, the interdependent effects of deconcentration would increase the need for and restrictiveness of large-scale water conservation programs.</p>	<p>Mitigation measure C.3 would reduce the indirect impacts of the CMP of beneficial uses and the water supply/demand balance:</p>	<p>Less than Significant</p>

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
G. BIOLOGICAL RESOURCES		
<p>Direct Impacts: To the extent that the CMP is successful in maintaining LOS in the vicinity of SEAs, the CMP would have a beneficial impact as a result of reduced congestion and air pollution. If the CMP results in the diversion of traffic to corridors passing through SEAs, or from already-congested corridors to corridors which are currently relatively free-flowing, leading to increased levels of congestion, traffic, and air pollution in proximity to SEAs, the CMP may have an adverse effect on biological resources. Some CMP CIP projects may be routed through SEAs. Any capital improvement projects located in or near SEAs pose the potential for significant biological impacts.</p>	<p>G.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the biological resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none">• Prior to any new construction on existing or proposed highways within the boundaries of an SEA, the need for construction is reviewed and substantiated, and alternative alignments or appropriate mitigation measures are investigated and implemented as feasible. If no feasible alternative or mitigation is found, the project is performed in the most environmentally sensitive manner possible.	<p>With implementation of the mitigation measures listed above, program level biological resource impacts are not anticipated to be significant. The potential for significant adverse biological resource impacts to remain after implementation of CIP project specific mitigation's developed as part of CIP project specific environmental review, can only be assessed on a project specific basis.</p>

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
Amended - See ERRATA Notes	<ul style="list-style-type: none">• Site-specific studies are required for each capital improvement project located in the vicinity of an SEA to determine whether significant plant or animal life is present in a proposed alignment and the level of impact on those resources. In consultation with the California Department of Fish and Game and the U.S. Fish and Wildlife Service, detailed biological surveys are conducted prior to the adoption of roadway alignments which have the potential to adversely affect significant biological resources.• Appropriate consultation with the California Department of Fish and Game occurs to determine if special status species, not identified under the SEA program, occur in the project vicinity.• Vegetation removal occurs only where absolutely necessary for grading; revegetation with appropriate native plants is implemented as feasible.• Capital improvement projects which take place in recognized wetlands comply with local, state, and federal regulations governing the protection of these areas.	

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p><u>Indirect Impacts:</u> Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, particularly areas containing significant ecological resources, which has not been anticipated in the regional plans, the CMP could have a negative effect on biological resources. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis</p>	<ul style="list-style-type: none"> • Capital improvement projects within the coastal zone comply with coastal zone planning and local government management programs which prevent or reduce impacts on biological resources within the coastal zone. <p>G.2 The LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(2) of the Streets and Highways Code for acquisition or enhancement of resource lands to mitigate the loss of, or the detriment to, resource lands lying within the right-of-way acquired for proposed transportation improvements</p>	<p>Less than significant.</p>

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p>contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.</p>		
<p>H. CULTURAL RESOURCES</p>		
<p><u>Direct Impacts:</u> While prehistoric sites or artifacts could be discovered in the urbanized areas of Los Angeles County, it is likely that any archaeological sites on the surface would have been destroyed during past urbanization. Generally in the urbanized or urbanizing areas, archaeological and paleontological resources are uncovered during the construction phase of a project.</p>	<p>H.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the cultural resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas into the EIR:</p> <ul style="list-style-type: none"> The project sponsor contacts either the archeological resource information depository at UCLA or Cal State Northridge to determine the status of each site or corridor proposed for development, if it is determined during project-specific environmental review that the site or corridor is likely to contain archaeological resources. 	<p>With implementation of the mitigation measures listed above, program level cultural resource impacts are not anticipated to be significant. The potential for significant adverse cultural resource impacts to remain after implementation of CIP project specific mitigation's developed as part of CIP project specific environmental review, can only be assessed on a project specific basis.</p>
<p>The National Register entries, National Landmarks, State Landmarks, local designations, and Los Angeles Historic-Cultural Monuments are located along or near many of the streets and highways of the CMP Roadway System. Inclusion of a roadway or highway segment on the CMP network could ultimately lead to improvement projects on or near that segment, should service deteriorate below CMP Level of</p>		

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
Service standards. This could potentially lead to impacts on historic structures as part of CIP projects.	<ul style="list-style-type: none"><li data-bbox="823 456 1482 607">• A professional archaeologist is retained to aid in the assessment of those sites or corridors considered to have moderate to high likelihood of containing archaeological resources, and to recommend a course of action for preservation of significant resources.<li data-bbox="823 646 1482 922">• During construction, at sites judged to have moderate to high likelihood of containing paleontological resources, a qualified paleontologist approved by the California Archaeological Inventory Regional Information Center is on call to remove fossil remains found during construction. If fossil remains are discovered during construction, all activity at the fossil site shall be stopped until the paleontologist has removed the remains.<li data-bbox="823 961 1482 1214">• For those sites or corridors for which environmental review or subsequent analysis indicates a less than moderate likelihood of containing archaeological resources, the following measures are taken: If any archaeological materials are encountered during the course of the project development, the project shall be halted. The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal	

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p><u>Indirect Impacts:</u> Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas or the mountain or desert portions of the County, which has not been anticipated in the regional plans, the CMP could have a negative effect on cultural and archaeological resources in these areas.</p>	<p>State University, Northridge, or a member of the Society of Professional Archaeologist (SOPA), or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report are submitted to the UCLA Archaeological Information Center. All specimens collected are donated to the most appropriate educational research not possible to evaluate the potential impact until specific projects are proposed.</p> <ul style="list-style-type: none"> The environmental assessment adequately evaluates the potential for significant impacts to nearby historic resources, and includes appropriate mitigations. <p>Mitigation measure C.3 would reduce the indirect impacts of the CMP on historic resources:</p>	<p>Amended - See ERRATA Notes</p> <p>Less than significant.</p>

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TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
<p>I. PUBLIC SERVICES</p> <p><u>Direct Effects:</u> The construction of individual CIP projects may temporarily slow police and fire department responses and disrupt access.</p> <p>Some CIP projects may require additional right-of-way adjacent to existing parks and recreational facilities, reducing the already limited parkland in the County. Increased traffic volumes and/or speed in proximity to parks and recreational facilities could result in increased noise impacts, inhibited access to facilities, and an increased number of automobile-related accidents. Site-specific studies required for each capital improvement project of the CMP with a potential for adversely affecting parks and recreational facilities will determine the level of impact on those facilities.</p>	<p>I.1 The LACTC shall review project-level EIR's for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the public service impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • Prior to the construction of individual CMP capital improvement projects, the lead agency consults with affected police and fire departments to ensure these agencies adequate access to the affected portions of the CMP roadway network. • An assessment of the potential impacts to parks and recreational facilities is included in the environmental assessment of any CMP transportation facilities to be located in proximity to parks and recreational facilities which includes an assessment of traffic, noise, and access impacts. • Amended - See ERRATA Notes 	<p>With implementation of the mitigation measures listed above, program level public services impacts are not anticipated to be significant. The potential for significant adverse police, fire and parks and recreational impacts to remain after implementation of CIP project specific mitigation's developed as part of CIP project specific environmental review, can only be assessed on a project specific basis.</p>

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TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES (continued)

<u>ENVIRONMENTAL IMPACT</u>	<u>MITIGATION</u>	<u>LEVEL OF SIGNIFICANCE AFTER MITIGATION</u>
Local governments' compliance with the CMP could result in the diversion of local government personnel and revenues.	I.2 The LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(2) of the Streets and Highways Code for acquisition or enhancement of resource lands to mitigate the loss of, or the detriment to, resource lands lying within the right-of-way acquired for proposed transportation improvements	With implementation of the mitigation measures listed, impacts are not anticipated to be significant.
	I.3 The LACTC shall work with local jurisdictions to investigate a county-wide process to deal with future year CMP implementation.	
	I.4 The LACTC shall continue to work with public and private interests regarding CMP requirements to minimize adverse public/private cost impacts associated with the CMP.	

EPA sanctions on the South Coast Air Basin for nonattainment of federal clean air standards for ozone and carbon monoxide. These sanctions would result in a construction ban on new large stationary sources and the withholding of federal highway construction funds.

Population growth and housing construction would continue to occur, with a greater share of housing construction focused in outlying housing-rich subregions as a result of the EPA imposed stationary source construction ban.

- **RMP Alternative 2 - Facility Intensive Response to Growth Trends.** This alternative consisted of the construction of 7,660 lane-miles of freeway improvements region-wide, compared to the construction of 3,097 miles of mixed-flow and HOV lane miles included in the RMP. It included a comparable level of transit corridor development to the RMP (367 miles, verse the RMP's 360 miles), however, this alternatives included a much lower level of TDM effort than the RMP.
- **RMP Alternative 3 - Facility-Intensive Emphasis with Balanced Growth.** This alternative consisted of the construction of 6,043 lane miles of freeway improvements region-wide, compared to the construction of 3,097 miles of mixed-flow and HOV lane miles under the RMP. It included slightly less transit corridor development than RMP Alternative 2 (294 miles, compared to the RMP's 360 miles). Like RMP Alternative 2, it included a much lower level of TDM effort than the RMP. The key difference between RMP Alternative 2 and RMP Alternative 3 was that Alternative 3 included jobs/housing balance strategies.
- **RMP Alternative 4 - Demand Management Emphasis with Balanced Growth.** This alternative included a much lower level of freeway improvement construction region-wide than the RMP (1,858 lane miles compared to 3,097 for the RMP). It included job/housing balance strategies coupled with the same TDM requirements as the RMP and a similar level of transit corridor development (397 miles compared to the RMP's 360 miles). The slightly higher transit corridor development resulted in a slightly higher mode split under this alternative than under the RMP (19.4% compared to the RMP's 19.3%)
- **RMP Alternative 5 -- Demand Management Response to Growth Trends.** Unlike RMP Alternative 4, this alternative did not include jobs/housing balance strategies. It included construction of less freeway improvements than the RMP (2,766 lane miles compared to the RMP's 3,097 lane miles) but more transit corridor development (499 miles compared to the

RMP's 360 miles). This mix of improvements resulted in a higher transit mode-split than under the RMP (19.5% compared to the RMP's 19.3%).

Because the CMP statute requires that the CMP be consistent with the RMP, the alternatives developed in this EIR must also be consistent with the adopted RMP. Therefore, the proposed CMP, and the TDM Intensive and Capital Intensive CMP alternatives, are tiered from the adopted RMP. The proposed CMP and the two program alternatives have been designed to be consistent with the adopted RMP strategy and to contain the five elements required by statute for a CMP. Program alternatives which were not consistent with the adopted RMP have been excluded from the CMP alternative analysis since they do not meet the CMP Statute's RMP consistency requirement and since they were generally felt to represent an inferior strategy based on the previous RMP analysis. The four alternatives analyzed in this document are described below:

1. NO PROJECT (EXISTING SYSTEM)

This alternative, as the No Project Alternative, presumes that no changes are made to the existing transportation system, and that the existing system must accommodate future travel demand. Local land use decisions would continue to be made, but the regional highway and transit system would not be able to accommodate the mobility needs of the County.

As discussed in the RMP EIR, congestion on the highway and arterial system would degrade to Level of Service F on most of the system, peak period average vehicle speed would significantly decrease, and as a result, peak period travel would lengthen as people increasingly attempt to avoid congestion.

2. NO PROJECT (NO CMP, NO FUTURE STATE FUNDING)

Under this alternative, the CMP would not be adopted. This would directly result in the loss of future Flexible Congestion Relief (FCR) and Traffic Systems Management (TSM) funding. In addition, the federal congestion management requirements now tied to transportation funding would likely not be met, resulting in the loss of those funds as well. The effect of losing these funding sources would be to substantially delay the delivery of transportation capital

improvement projects throughout the County, as local funding sources would be the primary source available for transportation improvements.

The other components of the CMP would not be implemented. This includes the highway and transit Level of Service, network monitoring, the trip reduction ordinance, and the land use analysis program.

Local land use decisions would continue to be made with varying attention to regional transportation impacts and without the benefit of the additional data which would be generated through a CMP monitoring program. The method used to perform land use impacts evaluations would continue to vary by jurisdiction.

As a result of the delay in project delivery of planned projects, highway congestion would continue to deteriorate in many parts of the county and the transportation improvements which did occur would be less likely to adequately alleviate severe congestion problems.

Transportation demand management ordinances and policies would be developed individually by each jurisdiction, if at all. This could lead to inconsistent standards and approaches within the region which could, in turn, have an indirect effect on the pattern of land use in the County.

3. TDM INTENSIVE

This alternative would be based on an intensive performance based TDM program approach to congestion management. The program would be aimed at achieving the Regional Mobility Plan's TDM goal of a 30% reduction in auto-based home-work trips and a 19.4 percent transit mode share. Since the overall CMP must still be implemented within the same limited resources, the additional TDM effort would largely reduce the CIP component of the program. The CMP LOS standards, networks and land use analysis program would be the same as for the proposed CMP.

4. CAPITAL INTENSIVE

Under this alternative a capital-intensive approach to maintaining mobility would be taken. This alternative proposes to accelerate much of the capital component of the RMP into the seven year

CIP. This component would include no additional TDM efforts above existing levels. The network, LOS and land use analysis components of the alternative would be the same as for the proposed CMP.

5. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

After mitigation, no significant adverse program level impacts are anticipated to result from implementation of the CMP. All impacts would be CIP project specific.

The California Environmental Quality Act (CEQA) requires that an environmentally superior alternative be identified. The TDM Intensive Alternative is environmentally superior to the no project alternatives (Alternatives 1 and 2) and the Capital Intensive Alternative because it would have fewer impacts.

Amended - See
ERRATA Notes

Although this alternative is environmentally superior to the other alternatives, it is not superior to the proposed CMP. This alternative would result in potentially more land use, transportation, air quality and public services impacts than the proposed CMP. Because this alternative minimizes capital improvement projects, it would reduce the project specific CIP related impacts of the proposed CMP. For this same reason, it would have fewer noise, geological, water resources and cultural resource impacts than the proposed CMP. This alternative, however, still falls short of regional mobility goals and air quality goals. The TDM Intensive Alternative is inferior to the proposed CMP because: (1) it would not include the balance of capital improvement projects included in the RMP and would therefore not achieve RMP mobility goals; (2) there is great uncertainty regarding the actions required to achieve this level of TDM; (3) stringent controls on new development could deter such development and preclude the creation of transportation beneficial land uses and densities; (4) congestion on the transportation system would continue to degrade under this alternative; and (5) this alternative would have negative air quality impacts when compared to the proposed CMP.

Therefore, the CMP project is environmentally superior the project alternatives.



I. INTRODUCTION

The following Environmental Impact Report (EIR) analyzes the potential of the 1992 Congestion Management Program (CMP) for Los Angeles County to create significant environmental impacts. This assessment fulfills the requirements of the California Environmental Quality Act (CEQA) and is designed to inform decision-makers, responsible agencies and the general public of the proposed action and the range of potential environmental impacts of that action. The EIR also analyzes alternatives to the proposed CMP and recommends a set of measures to mitigate any potentially significant adverse impacts identified in the EIR. The Los Angeles County Transportation Commission (LACTC or Commission), the Lead Agency for EIR, will use this EIR in their review prior to adopting the 1992 CMP. This EIR is tiered from the EIR for the Regional Mobility Plan

The CMP is a new program mandated by State Government Code Sections 65088, et. seq., adopted in June of 1990. The intent of the program is to provide a mechanism for linking regional mobility with local land use decisions while working toward improved air quality. By statute, the LACTC was given a one year extension to adopt the CMP, because it was determined that an EIR was necessary.¹ In accordance with this extension, the LACTC must adopt the CMP by December 1, 1992.

Environmental Work to Date

In December of 1991, a Notice of Preparation (NOP) and Initial Study for the Congestion Management Program for Los Angeles County were issued by the LACTC, based on the Final Draft CMP.² After issuance of the NOP and Initial Study, the modifications detailed below were made to the CMP. On June 5, 1992, the Commission issued a revised NOP and Initial Study describing the changes to the proposed CMP and reassessing the CMP's potential to create

¹ Government Code Section 65082

² A copy of the original NOP and Initial Study is incorporated herein by reference and is available from the LACTC offices located at: 818 West Seventh Street, Los Angeles, CA 90017, Suite 1100.

significant environmental effects. A copy of the revised NOP and Initial Study and a copy of comment letters received in response to both NOPs are contained in Appendix B.

Based on the revised Initial Study, this EIR evaluates the CMP's potential to create the following classes of significant environmental effects:

- Land Use
- Transportation
- Air Quality
- Noise
- Geology
- Water Resources
- Biological Resources
- Cultural Resources
- Public Services

The CMP

The Final Draft CMP, released by the LACTC on August 14, 1991 contained five components:³

1. The definition of the regional transportation network and Level of Service (LOS) performance standards for the highway segments and intersections which make up the system.
2. Standards for frequency and routing of transit service and coordination between transit operators.
3. A trip reduction and travel demand management (TDM) element promoting alternative transportation methods.

³ As required by Section 65089(b) of the Government Code.

4. A program to analyze the impact of local land use decisions on the regional transportation system, including the preparation of deficiency plans and the development of a County-wide nexus development fee.
5. A seven-year capital improvement program that includes projects proposed for funding through the State Flexible Congestion Relief (FCR) or Traffic System Management (TSM) program.

The CMP has been revised since publication of the Final Draft CMP in 1991: Component one, the Highway Element, has been revised to include a final CMP network; component three, the TDM element, has been further refined to identify minimum threshold of effort; and component four, the Land Use Program, has been significantly altered. The following is a brief description of the CMP elements and the nature of the modifications made to the Program since issuance of the Final Draft CMP:

CMP Highway and Roadway System Element⁴ - As part of the CMP, the LACTC has defined a set of highways and roadways which will be monitored to ensure that established levels of regional highway mobility are maintained. The Final Draft CMP documents the rationale for selecting specific highways and roadways included in the network as well as the LOS Standards, monitoring guidelines, responsibility assignments, and analysis methodology. Additional routes for further study were proposed for addition to the CMP network. These routes were considered in consultation with local jurisdictions and a recommended CMP network has been established. This has resulted in minor changes to the defined highway network since publication of the Final Draft CMP. Chapter II of this document contains a description of the modified network.

CMP Transit Element⁵ - The CMP Transit Element establishes a regional transit monitoring network and establishes standards for frequency, routing and coordination of regional transit services. The purpose of the transit monitoring network is to gauge the effectiveness of transit in relieving traffic congestion in travel corridors of regional significance. Transit monitoring efforts are intended to provide important information on the routing, frequency, capacity and time competitiveness of existing services relative to the automobile. The transit monitoring network

⁴ See Section 65089(b)(1) of the Government Code.

⁵ See Section 65089(b)(2) of the Government Code.

is also intended to serve as a planning tool which will facilitate identification of potential gaps in the current transit system, as well as opportunities to make transit a more effective traffic mitigation strategy. This section of the CMP also discusses project review procedures to provide transit operators the opportunity to identify the impact of linking transit impacts and transit mitigation measures to the local development proposals. No substantive changes have been made in this component since publication of the Final Draft CMP.

Transportation Demand Management (TDM) Element⁶ - As required by statute, the CMP includes a trip reduction and travel demand management element aimed at promoting alternative transportation methods. The CMP contains a description of existing TDM programs. Since each local jurisdiction is responsible for adopting and implementing a trip reduction and travel demand ordinance,⁷ the focus of the TDM Element is to identify a sample TDM ordinance with minimum TDM standards. The LACTC has refined the sample TDM ordinance to focus on design standards that are implemented through the development review process. This approach, focusing on design related requirements, efficiently complements the Southern California Air Quality Management District's Regulation XV TDM requirements, which focuses on employer trip reduction programs. This approach is a refinement of TDM requirements since publication of the final draft.

Land Use Analysis Program⁸ - This element of the CMP defines a mechanism for ensuring that the impacts of local development projects on the CMP system are analyzed. In lieu of the land use analysis program and regional fee approach to deficiency planning described in the Final Draft CMP, the revised CMP includes a requirement that local jurisdictions, under existing CEQA requirements, analyze the regional transportation impacts of a development project in the project's EIR.⁹ The CMP staff is currently engaged in a planning and feasibility study regarding various approaches to address future congestion on the CMP system. This study will form the

⁶ See Section 65089(b)(3) of the Government Code.

⁷ Section 65089.3(b) of the Government Code.

⁸ See Section 65089(b)(4) of the Government Code.

⁹ Local jurisdictions are required to have such a program by Section 65089.3(c) of the Government Code.

basis of a deficiency plan approach which is expected to be included in the 1993 CMP update scheduled for adoption in November of 1993.

Capital Improvement Program Element - As required by statute¹⁰, the CMP includes a seven year Capital Improvement Program (CIP) to maintain or improve the Level of Service on the CMP highway system, transit performance, and to mitigate regional transportation impacts identified through the CMP land use analysis program. The CIP includes a list of specific improvements proposed for the regional system. The 1992 CMP CIP list consists of Los Angeles County projects consistent with the current Regional Mobility Plan and included in the State Transportation Improvement Program (STIP). These projects have received prior environmental review in the EIR for the Regional Mobility Plan (RMP), which is herein incorporated by reference.¹¹

¹⁰ See Section 65089(b)(5) of the Government Code.

¹¹ Draft Environmental Impact Report Regarding the SCAG Regional Mobility Plan, October 1988 and the Final Environmental Impact Report Regarding the 1988 SCAG Regional Mobility Plan, (SCH #87-121613) December 1988. The RMP and the RMP EIR are summarized in relevant sections of this EIR and are available for review at the LACTC offices located at: 818 West Seventh Street, Los Angeles, CA 90017, Suite 1100. They are also available at the SCAG office located at 818 West Seventh Street, Los Angeles, CA 12th floor.

II. PROJECT DESCRIPTION

The proposed project consists of the adoption and implementation of the CMP for the County of Los Angeles. The CMP will be administered by LACTC, which is the designated Congestion Management Agency (CMA) for Los Angeles County. The LACTC is the lead agency for the preparation of this Program level EIR. However, local jurisdictions, transit operators, the South Coast Air Quality Management District (SCAQMD), the Southern California Association of Governments (SCAG), and Caltrans all have roles and responsibilities regarding implementation of the program, as described below in Section II.B. and II.C.

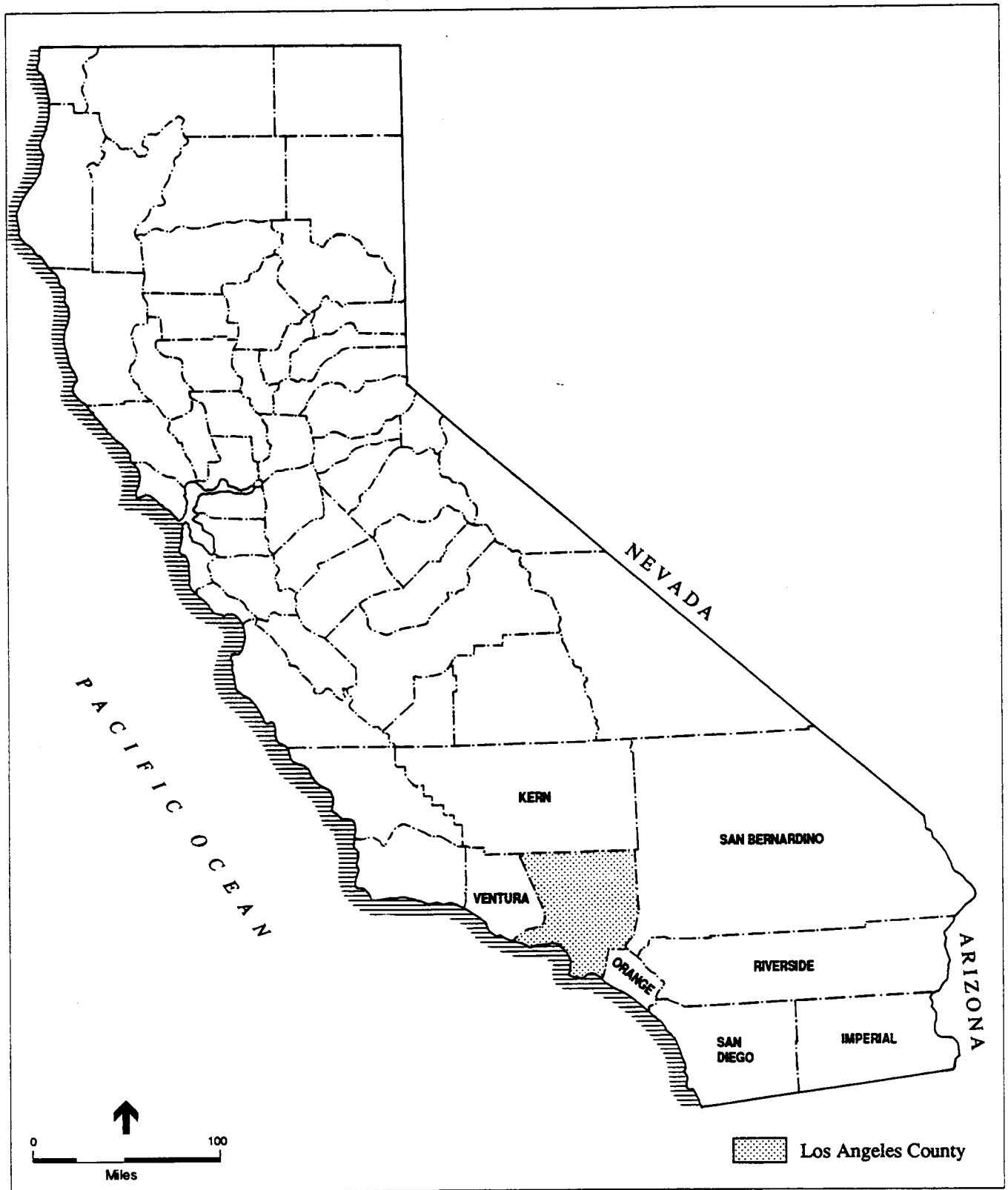
II.A. PROJECT LOCATION

The planning area for the CMP includes all of Los Angeles County which is 4,083 square miles in size. The County is located in Southern California and is bordered by Ventura County to the west; Kern County to the north; San Bernardino and Orange counties to the east, and the Pacific Ocean to the south (see Figure 1).

The County contains 88 incorporated cities. These cities contain 7,884,000 of the County's 8,855,000 residents and cover 1,386 square miles of the County's total area.¹ The County of Los Angeles and the 88 incorporated cities represent the 89 local jurisdictions participating in the CMP for Los Angeles County. Table 1 lists the cities in the County. Figure 2 shows their locations.

Los Angeles County, along with the counties of Imperial, Orange, Riverside, San Bernardino and Ventura, make up the Southern California planning region. SCAG is the designated metropolitan planning organization for the Southern California region. SCAG has divided the County into ten sub-regional areas for forecasting purposes. SCAG groups these sub-regional areas into three categories: urban, urbanizing, and mountain and desert (see Figure 3). Table 2 shows the growth projections for the sub-regional areas within the County.

¹ Data is from the Los Angeles County Population Research section. Population figures are for January of 1991.



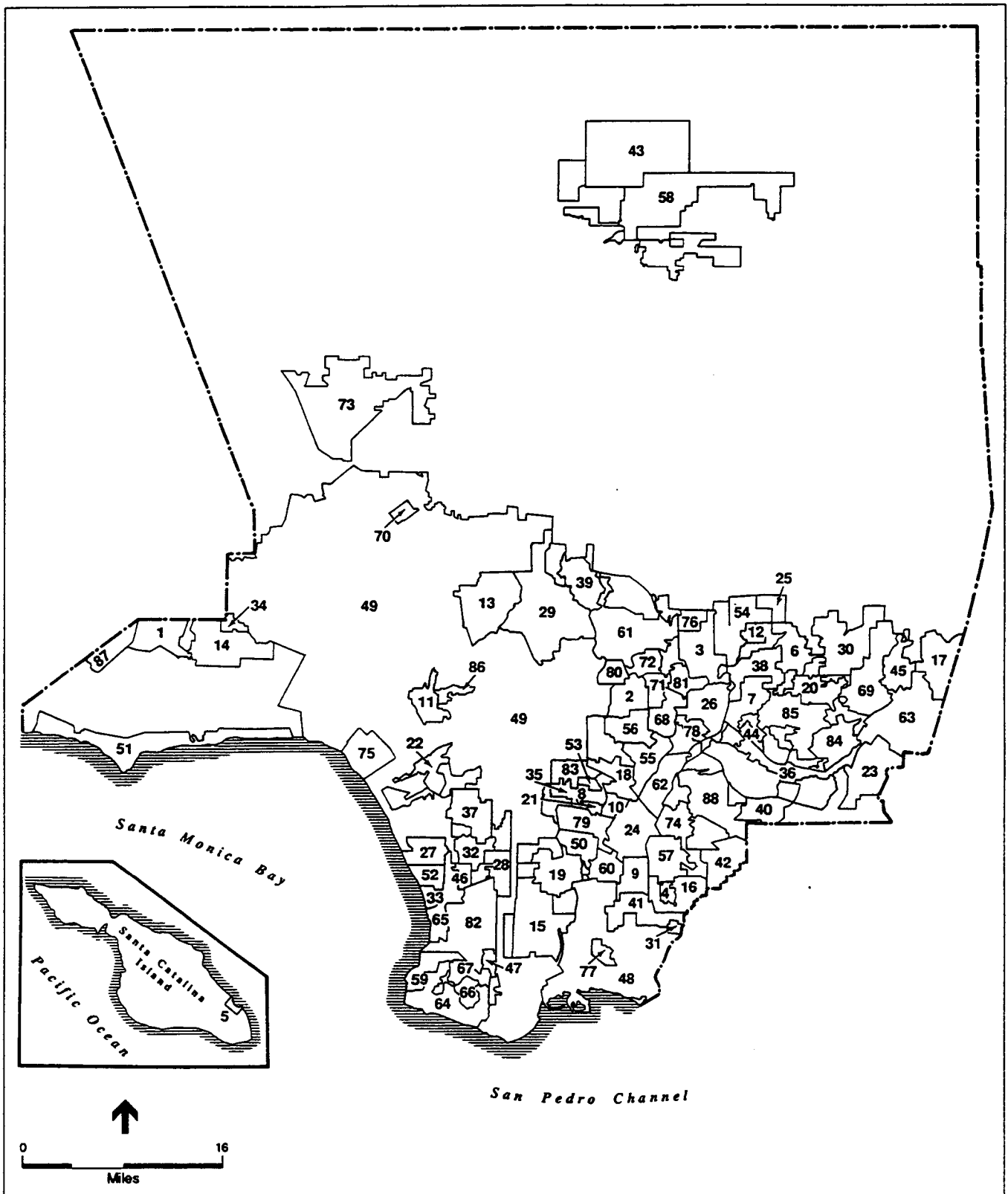
SOURCE: Environmental Science Associates, Inc.

Los Angeles County Congestion Management Program / 91578 ■

Figure 1
Project Location Map

TABLE 1: CITIES IN LOS ANGELES COUNTY

1.	AGOURA HILLS	45.	LA VERNE
2.	ALHAMBRA	46.	LAWNDALE
3.	ARCADIA	47.	LOMITA
4.	ARTESIA	48.	LONG BEACH
5.	AVALON	49.	LOS ANGELES CITY
6.	AZUSA	50.	LYNWOOD
7.	BALDWIN PARK	51.	MALIBU
8.	BELL	52.	MANHATTAN BEACH
9.	BELLFLOWER	53.	MAYWOOD
10.	BELL GARDENS	54.	MONROVIA
11.	BEVERLY HILLS	55.	MONTEBELLO
12.	BRADBURY	56.	MONTEREY PARK
13.	BURBANK	57.	NORWALK
14.	CALABASAS	58.	PALMDALE
15.	CARSON	59.	PALOS VERDES ESTATES
16.	CERRITOS	60.	PARAMOUNT
17.	CLAREMONT	61.	PASADENA
18.	COMMERCE	62.	PICO RIVERA
19.	COMPTON	63.	POMONA
20.	COVINA	64.	RANCHO PALOS VERDES
21.	CUDAHY	65.	REDONDO BEACH
22.	CULVER CITY	66.	ROLLING HILLS
23.	DIAMOND BAR	67.	ROLLING HILLS ESTATES
24.	DOWNEY	68.	ROSEMEAD
25.	DUARTE	69.	SAN DIMAS
26.	EL MONTE	70.	SAN FERNANDO
27.	EL SEGUNDO	71.	SAN GABRIEL
28.	GARDENA	72.	SAN MARINO
29.	GLENDALE	73.	SANTA CLARITA
30.	GLENDORA	74.	SANTE FE SPRINGS
31.	HAWAIIAN GARDENS	75.	SANTA MONICA
32.	HAWTHORNE	76.	SIERRA MADRE
33.	HERMOSA BEACH	77.	SIGNAL HILL
34.	HIDDEN HILLS	78.	SOUTH EL MONTE
35.	HUNTINGTON PARK	79.	SOUTH GATE
36.	INDUSTRY	80.	SOUTH PASADENA
37.	INGLEWOOD	81.	TEMPLE CITY
38.	IRWINDALE	82.	TORRANCE
39.	LA CANADA-FLINTRIDGE	83.	VERNON
40.	LA HABRA HEIGHTS	84.	WALNUT
41.	LAKESWOOD	85.	WEST COVINA
42.	LA MIRADA	86.	WEST HOLLYWOOD
43.	LANCASTER	87.	WESTLAKE VILLAGE
44.	LA PUENTE	88.	WHITTIER

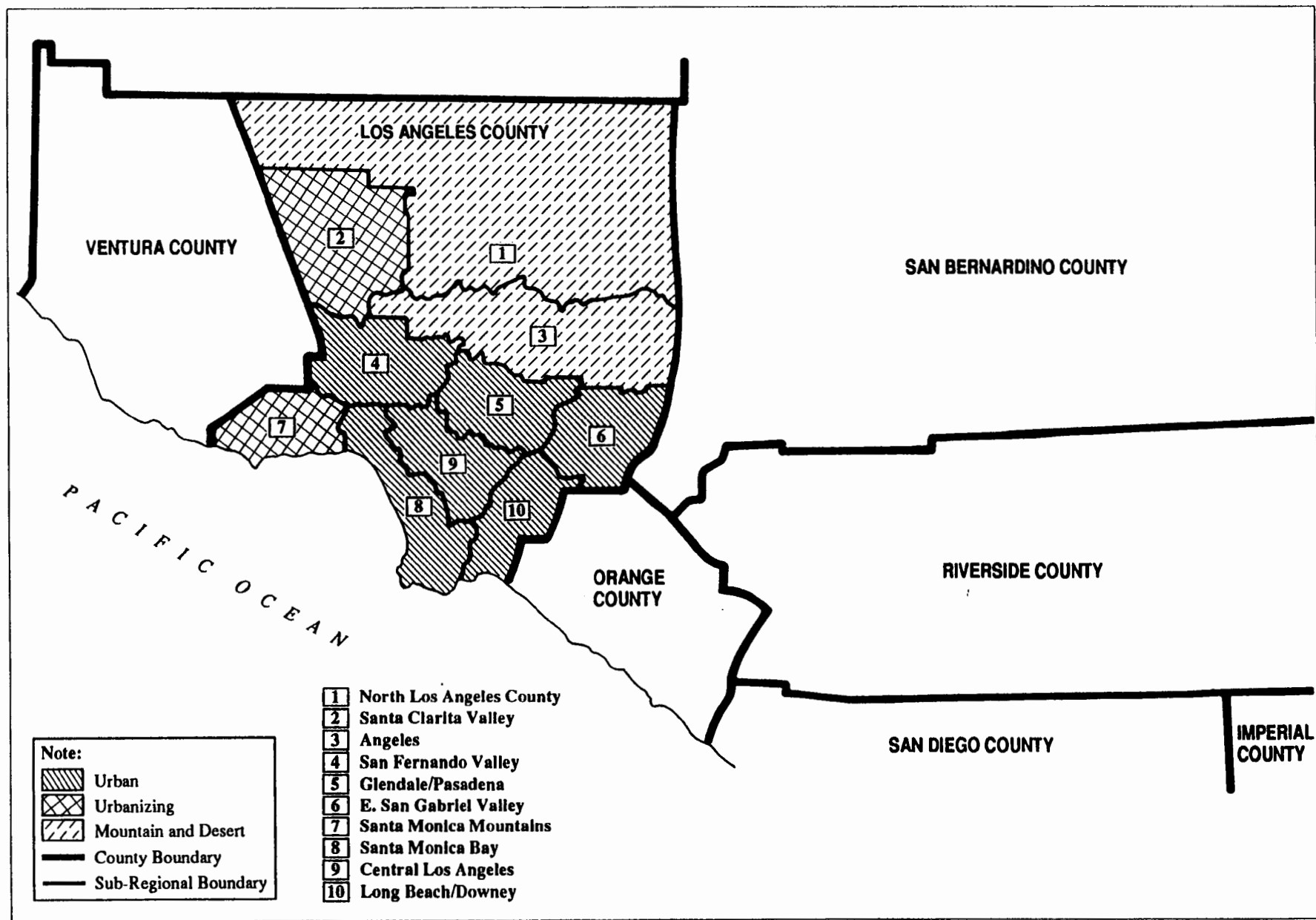


SOURCE: Environmental Science Associates, Inc.

Los Angeles County Congestion Management Program / 91578 ■

Figure 2
Location of Cities and Unincorporated Areas

Amended - See
ERRATA Notes



SOURCE: (SCAG) Southern California Association of Governments.

Los Angeles County Congestion Management Program / 91578 ■

Figure 3
Subregional Areas

TABLE 2: GROWTH PROJECTIONS FOR THE COUNTY'S SUB-REGIONAL AREAS

	1984 Population	2010 Population	% Increase	1984 Employment	2010 Employment	% Increase	1984 Housing	2010 Housing	% Increase
URBAN									
Central Los Angeles	2,102,000	2,354,500	12%	1,435,300	1,634,500	14%	777,100	898,100	16%
E. San Gabriel Valley	739,300	1,071,500	45%	239,300	391,600	64%	233,000	355,100	52%
Glendale/Pasadena	1,202,200	1,412,000	17%	485,400	616,200	27%	442,500	537,100	21%
Long Beach/Downey	1,075,800	1,312,100	22%	482,600	632,200	31%	400,000	503,500	26%
San Fernando Valley	1,177,400	1,593,900	35%	580,900	809,800	39%	454,000	643,000	42%
Santa Monica Bay	1,297,400	1,606,400	24%	759,500	1,012,500	33%	519,200	666,100	28%
SUBTOTAL	7,594,100	9,350,400	23%	3,983,000	5,096,800	28%	2,825,800	3,602,900	28%
COUNTY SHARE	96.58%	91.39%		98.28%	94.52%		96.66%	91.00%	
URBANIZING									
Santa Clarita Valley	89,200	242,400	172%	23,400	102,200	337%	29,200	89,800	208%
Santa Monica Mountains	58,100	106,400	83%	13,200	31,800	141%	21,300	42,900	101%
SUBTOTAL	147,300	348,800	137%	36,600	134,000	266%	50,500	132,700	163%
COUNTY SHARE	1.87%	3.41%		0.90%	2.49%		1.73%	3.35%	
MOUNTAINS AND DESERT									
Angeles National Forest	2,400	2,400	0%	600	600	0%	1,100	1,100	0%
North Los Angeles County	118,900	529,600	345%	32,700	160,800	392%	46,100	222,600	383%
SUBTOTAL	121,300	532,000	339%	33,300	161,400	385%	47,200	223,700	374%
COUNTY SHARE	1.54%	5.20%		0.82%	2.99%		1.61%	5.65%	
TOTAL FOR COUNTY	7,862,700	10,231,200	30%	4,052,900	5,392,200	33%	2,923,500	3,959,300	35%

SOURCE: SCAG 1989 Regional Growth Management Plan Tables VI-1,2 &3

As shown in **Table 2**, most of the County's population lives in the urban portion of the County: 7,594,100 in 1984 projected to increase to 9,350,400 by the year 2010. Although the population of the urban portion of the County is projected to increase substantially, the share of the County's population living in the urban sub-regional areas is projected to decline slightly from 96.58% in 1984 to 91.39% by the year 2010 as a result of increased growth in the urbanizing, and mountain and desert portions of the County. According to SCAG, the fastest growing sub-regional areas within the County are projected to be the Santa Clarita Valley and North Los Angeles County. Population in Santa Clarita Valley is expected to increase by 172% to 242,400, employment by 337% to 102,200, and housing by 208% to 89,800. North Los Angeles County is anticipated to experience a 345% increase in population to 529,600, a 392% increase in employment to 160,800, and a 383% increase in housing to 222,600. Even with these substantial increases, the share of the population living in the urbanizing portion of the County represented by the Santa Clarita Valley and the Santa Monica Mountains is only projected to increase from 1.87% to 3.41% of the Los Angeles County total. Similarly, the share of the population living in the mountain and desert portion of the County represented by North Los Angeles County and the Angeles National Forest is projected to increase from 1.54% to 5.2% of the population.²

II.B. THE CONGESTION MANAGEMENT PROGRAM

The CMP is a new program enacted by the State to address traffic congestion in California's urbanized counties. In establishing the CMP requirement, the State Legislature emphasized the importance of California's transportation system to maintaining the economic vitality of the State. The Legislature also noted that the existing transportation system relies on a street and highway system that is currently over-crowded. The resulting congestion results in significant hours of delay, increased pollutants released into the air, and increased costs to the motoring public.

² Data is from Tables VI-1, 2 and 3 of SCAG's 1989 Regional Growth Management Plan and represents the adopted policy forecast, which incorporates SCAG's jobs/housing balance policy.

Regulatory Framework

The CMP requirement originated in the State Legislature with the passage of Assembly Bill 471 (1989) and Assembly Bill 1791 (1990). The program requirement became effective when Proposition 111 was enacted by the voters in June of 1990. The California voters approved Propositions 108 and 111 in June 1990, and put into place a nine-cent-per-gallon gas tax. These taxes are expected to generate approximately \$18.5 billion in gas tax revenues to fund transportation investment statewide over a ten year period. A portion of these funds are returned to local governments for transportation related purposes. In order to receive these funds, local jurisdictions must comply with local CMP requirements. These requirements are as established in Section 65088 through 65089.2 of the California Government Code and include monitoring of the CMP highway system, adopting and implementing local TDM ordinances, adopting and implementing programs to assess the impact of land use decisions on the CMP system, and preparing and adopting deficiency plans when level of service standards are not attained.

The intent of the program is to: link land use, transportation, and air quality decisions; to develop a partnership among transportation decision makers in developing multi-modal transportation solutions; and that the CMP be the first step in identifying congestion relief projects for state gas tax funding.

Each urban county in the state is required to designate a Congestion Management Agency (CMA) to develop and annually update a CMP. Preparation of a CMP is a condition for eligibility to receive the new fuel tax subventions. Section 65089(b) requires each CMP to contain the following five elements:

1. An element designating the CMP transportation system and establishing LOS standards for the highways and roadways included in that system.
2. A transit standards element for service frequency, routing, and coordination among multiple transit agencies operating with the CMP's jurisdiction.
3. A transportation demand and trip reduction element that includes alternatives to single-occupant auto use and promotes strategies to manage overall travel demand.

4. A land use program to analyze the impacts of land use decisions by local jurisdictions on the regional transportation system.
5. A seven-year capital improvement program (CIP) to maintain or improve the traffic and transit standards or to mitigate the impact of new development.

In addition to these components, the CMA must develop a uniform data base for use in a computer model of the countywide transportation system.³ The LACTC is currently in the process of developing the model for Los Angeles County. It also has the responsibility, as CMA, to review and approve local community models used for CMP purposes and assess their consistency with the countywide transportation model.

After approving the CMP, the CMA must forward it to the regional transportation agency for review.⁴ SCAG is the regional transportation agency for Los Angeles County. SCAG must then evaluate whether the proposed CMP is consistent with the RMP. SCAG must also evaluate the compatibility of Los Angeles County's CMP with the CMPs of the four other urbanized counties in the SCAG planning region. SCAG has developed criteria for determining CMP consistency and these are included in Appendix G. If SCAG finds that the proposed CMP is inconsistent with the RMP, it may remove inconsistent projects from the Regional Transportation Improvement Program (RTIP).⁵ Consistent CMPs are incorporated into the RMP and served as a county level building block, working towards regional mobility goals. This program is a list of highway and transit projects that SCAG recommends to the State for inclusion in the State Transportation Improvement Program (STIP). The STIP contains transportation projects from throughout California. Inclusion in the STIP is essential to receive certain State and federal funding.

³ See Section 65089(b)(5) of the Government Code.

⁴ See Section 65089.2 of the Government Code.

⁵ Ibid.

Goals and Objectives

The Congestion Management Program was created by the State Legislature in recognition of the following conditions and with the following objectives:⁶

- (a) Although California's economy is critically dependent upon transportation, its current transportation system relies primarily upon a street and highway system designed to accommodate far fewer vehicles than are currently using the system.
- (b) California's transportation system is characterized by fragmented planning, both among jurisdictions involved and among the means of available transport.
- (c) The lack of an integrated system and the increase in the number of vehicles are causing traffic congestion that each day results in 400,000 hours lost in traffic, 200 tons of pollutants released into the air we breathe, and three million one hundred thousand dollars (\$3,100,000) added to costs to the motoring public.
- (d) To keep California moving, all methods and means of transport between major destinations must be coordinated to connect our vital economic and population centers.
- (e) In order to develop the California economy to its full potential, it is intended that federal, state, and local agencies join with transit districts, business, private and environmental interests to develop and implement comprehensive strategies needed to develop appropriate responses to transportation needs.

The following policy statements included in the Final Draft CMP outline the LACTC's objectives regarding CMP implementation:

- LACTC will develop a first year CMP that identifies a basic, core program, consistent with statutory requirements. As this program must be annually updated, LACTC will build on this core program as implementation experience is gained.

⁶ Section 65088 of the Government Code.

- Local land use authority will remain the responsibility of local jurisdictions. LACTC will not be responsible for directing the land use decisions of local jurisdictions. Rather, it is the LACTC's hope that local jurisdictions will use the CMP process as a tool in making land use decisions that consider and enhance countywide mobility.
- Local CMP implementation guidelines will be developed that provide local agencies with flexibility in meeting CMP responsibilities through existing local procedures, rather than creating new CMP processes.
- LACTC will work closely with local jurisdictions in implementing the CMP thereby ensuring local compliance with CMP requirements and the continued allocation of State gas tax funds.
- The CMP implementation process will increase coordination: between transportation providers responsible for implementing the best mix of transportation solutions; between land use and transportation programs; and, between neighboring cities and counties.
- The CMP will ensure consistency, compatibility, and integration of other transportation studies within the County.
- The CMP will serve as an important resource in the current update of the RMP. LACTC will work closely with SCAG in the update of the RMP, providing input based on what LACTC has learned through the CMP process. This will enable SCAG to incorporate relevant CMP information into the RMP, as required by statute and the Regional Transportation Planning Guidelines recently adopted by the California Transportation Commission.

In addition, the following goals have also been articulated for the CMP development process:

- The CMP will be supportive of the economy of Los Angeles County. While increased mobility and reduced congestion serve attainment of this goal, CMP policies and procedures are being developed to minimize cost and provide certainty and predictability to the public and private sector alike.

- The CMP will be supportive of efforts to rebuild Los Angeles as a result of the civil unrest during a state of emergency declared by the Governor on April 29, 1992.
- The CMP will be developed in close coordination with SCAG to ensure consistency between the CMP and the RMP.
- The CMP will work towards reducing congestion and improving air quality.

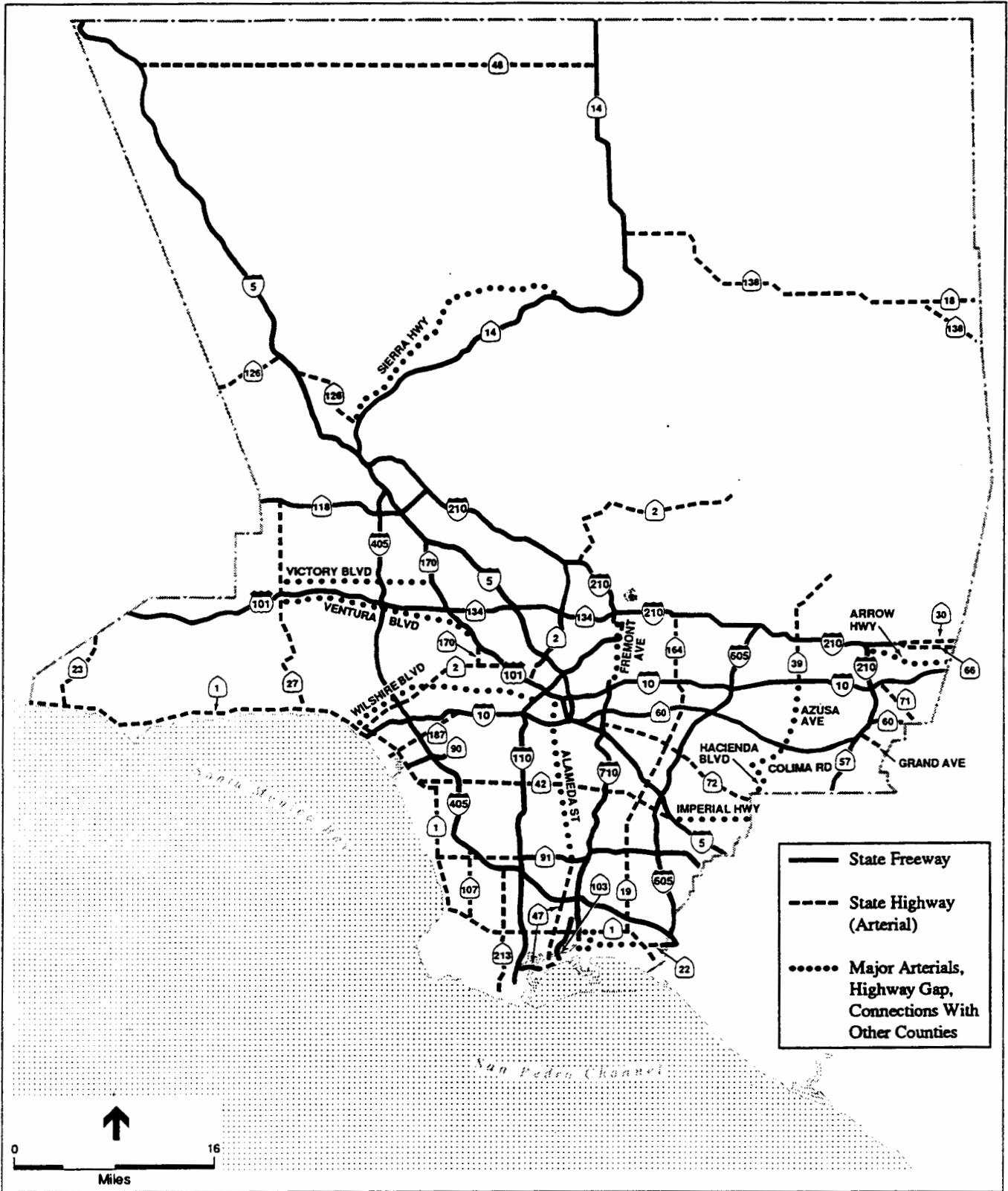
1992 Program Elements

CMP Highway and Roadway System Element - CMP statutes require the CMA to specify a CMP network containing all State highways and principal arterials. These highways and roadways are then monitored to ensure that established levels of regional highway mobility are maintained. Figure 4 shows the location of the 500 miles of State freeways, 400 miles of State arterials and 100 miles of local arterials which comprise the CMP highway network; Table 3 lists the components of the CMP Roadway System. The CMP Highway Network consists of: all existing State highways and principal arterials (i.e. routes that complete gaps in the State highway system; routes that connect with the CMP systems of adjacent counties; and routes along major inter-jurisdictional travel corridors, providing primary high-volume or multi-modal transportation.) Once a route is added to the CMP network it may not be removed. Additional routes may be added as deemed appropriate.

Included as part of this element of the CMP is the definition of the Levels of Service (LOS) standards for the highway network. The CMP requires that segments currently operating at LOS E or better can not degrade below LOS E; segments operating at LOS F are not allowed to degrade further. LOS E is characterized by fluctuating speeds and flows and intermittent long queues at intersections. Level of Service F is characterized by forced traffic flow and traffic jams. Figure 5 shows existing levels of congestion of the highway system. Standards will be set based on traffic counts just completed by local jurisdictions. CMP system standards will be established at LOS E, or at LOS F, for routes currently operating at LOS F.

Amended - See
ERRATA Notes

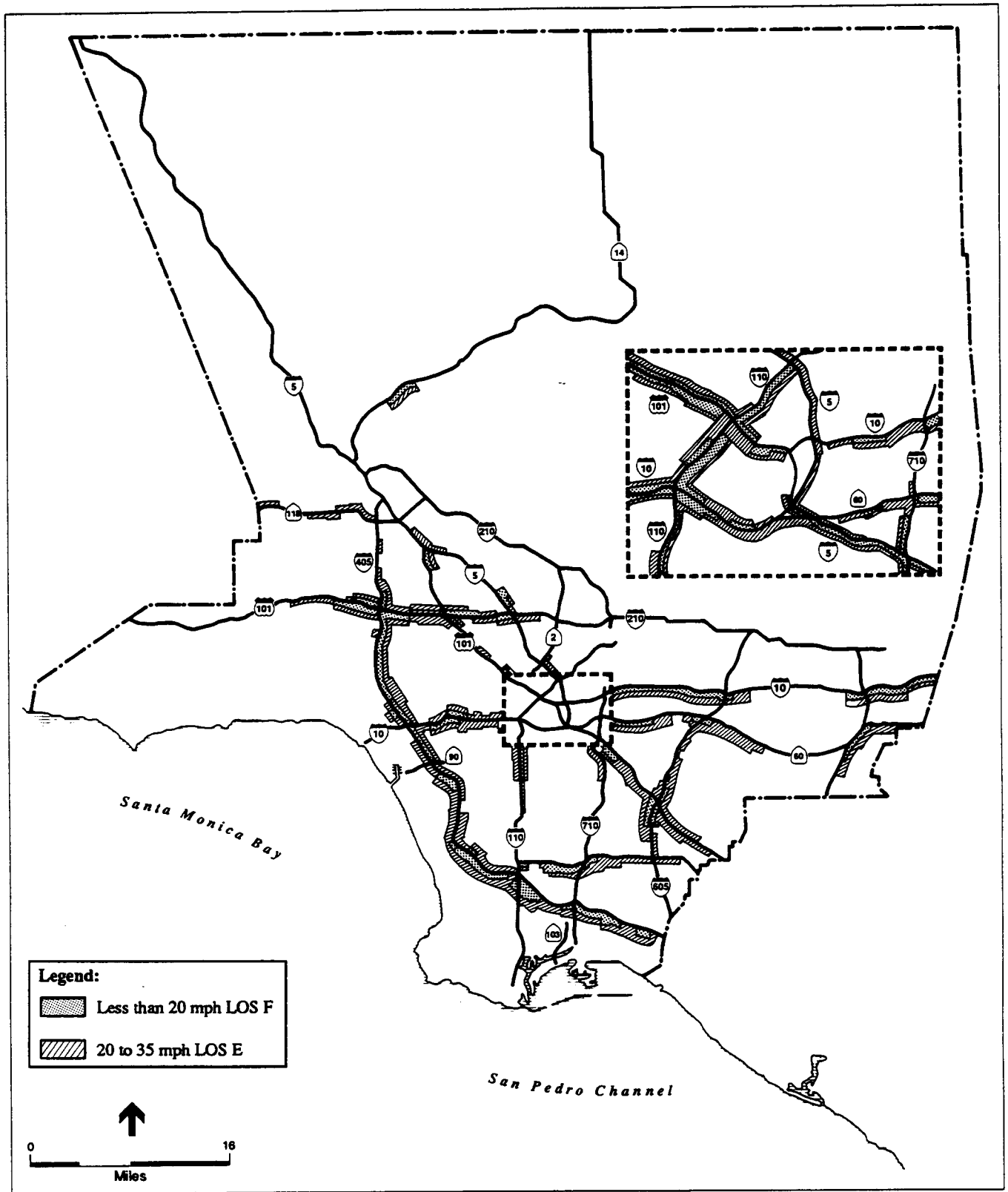
This element of the CMP also defines the methodology for calculating LOS and establishes network monitoring guidelines.



SOURCE: LACTC.

Los Angeles County Congestion Management Program / 91578 ■

Figure 4
CMP Highway Network



SOURCE: Caltrans.

Los Angeles County Congestion Management Program / 91578 ■

Figure 5
Existing Levels of Congestion
(On Highways)

TABLE 3: CMP ROADWAY SYSTEM

HIGHWAYS

ROUTE Freeway/Arterial Name

1	Pacific Coast Highway, Palisades Beach Road, Lincoln Boulevard, Sepulveda Boulevard
2	Lincoln Boulevard, Santa Monica Boulevard, Alvarado Street, Glendale Boulevard, GLENDALE FREEWAY, Angeles Crest Highway
5	SANTA ANA FREEWAY, GOLDEN STATE FREEWAY
10	SANTA MONICA FREEWAY, SAN BERNARDINO FREEWAY
14	ANTELOPE VALLEY FREEWAY
18	Pearblossom Highway
19/164	Lakewood Boulevard, Rosemead Boulevard
22	7th Street, GARDEN GROVE FREEWAY
23	Decker Canyon Road
27	Topanga Canyon Boulevard
30	FOOTHILL FREEWAY, Baseline Road, Williams Avenue, College Way
39	Azusa Avenue, San Gabriel Canyon Road
42/105	Manchester Boulevard, Firestone Boulevard
47	Vincent Thomas Bridge, Henry Ford Avenue, Alameda Street
48	Neenach Road, Avenue D
57	ORANGE FREEWAY
60	POMONA FREEWAY
66	Foothill Boulevard
71	Corona Expressway
72	Whittier Boulevard
90	Marina Expressway, MARINA FREEWAY
91	Artesia Boulevard, GARDENA FREEWAY, ARTESIA FREEWAY
101	SANTA ANA FREEWAY (SPUR), HOLLYWOOD FREEWAY, VENTURA FREEWAY
103	TERMINAL ISLAND FREEWAY

TABLE 3: CMP ROADWAY SYSTEM - (Continued)

HIGHWAYS

ROUTE	Freeway/Arterial Name
107	Hawthorne Boulevard
110	Gaffey Street, HARBOR FREEWAY, PASADENA FREEWAY, Arroyo Parkway
118	SIMI VALLEY FREEWAY, SAN FERNANDO VALLEY FREEWAY
126	Henry Mayo Drive, Magic Mountain Parkway, San Fernando Road
134	VENTURA FREEWAY
138	Neenach Road, Palmdale Boulevard, 47th Street East, Fort Tejon Road, Pearblossom Highway, Antelope Highway
170	Highland Avenue, HOLLYWOOD FREEWAY
187	Venice Boulevard
210	FOOTHILL FREEWAY
213	Western Avenue
405	SAN DIEGO FREEWAY
605	SAN GABRIEL RIVER FREEWAY
710	LONG BEACH FREEWAY, Pasadena Avenue, St. John Avenue

HIGHWAY GAPS/CONNECTORS WITH OTHER COUNTIES

Street	Limits
Arrow Highway	Route 210 to San Bernardino County
Azusa Avenue	Colima Road to Route 10
Colima Road	Hacienda Boulevard to Azusa Avenue
Fremont Avenue	Valley Boulevard to Columbia Street
Grand Avenue	Route 57 to San Bernardino County
Hacienda Boulevard	Orange County to Colima Road
Imperial Highway	Route 5 to Orange County
Valley Boulevard	Route 710 to Fremont Avenue

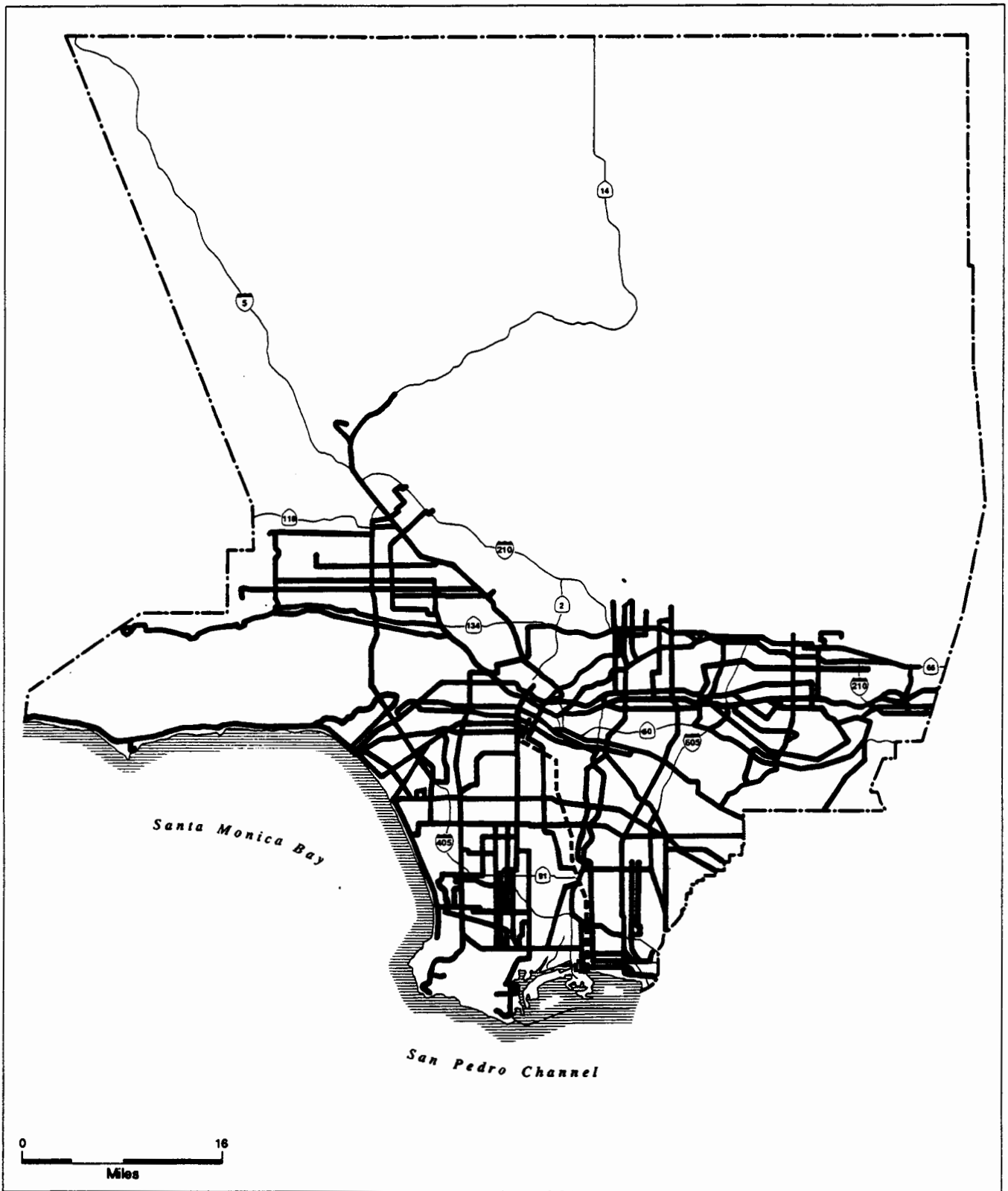
TABLE 3: CMP ROADWAY SYSTEM - (Continued)

MAJOR ARTERIALS

Street	Limits
Alameda Street	Port of Los Angeles to Route 101
Alamitos Avenue	Ocean Boulevard to Pacific Coast Highway
Seventh Street	Alamitos Avenue to Pacific Coast Highway
Sierra Highway	Route 126 to Route 14 (at Red Rover Mine Road)
Shoreline Drive	Route 710 to Ocean Boulevard
Ventura Boulevard	Topanga Canyon Boulevard to Lankershim Boulevard
Victory Boulevard	Topanga Canyon Boulevard to Route 170
Wilshire Boulevard	Ocean Avenue to Route 110

SOURCE: LACTC

CMP Transit Element - The CMP Transit Element establishes a regional transit monitoring network and establishes standards for frequency, routing and coordination of regional transit services. The purpose of the transit monitoring network is to gauge the effectiveness of transit in relieving traffic congestion in travel corridors of regional significance. Transit monitoring efforts are intended to provide important information on the routing, frequency, capacity and time competitiveness of existing services relative to the automobile. Transit performance standards have been established to determine transit capacity and frequency of regional services operating in the broad corridors identified in LACTC's Congested Corridor Action Plan. The transit monitoring network is also intended to serve as a planning tool which will facilitate identification of potential gaps in the current transit system, as well as the effectiveness of transit over time as a regional mobility strategy. **Figure 6** displays the CMP Transit Monitoring Network; **Table 4** lists the routes included in the Transit Monitoring Network. This section of the CMP also



SOURCE: LACTC.

Los Angeles County Congestion Management Program / 91578 ■

Figure 6
CMP Transit Network

TABLE 4: CMP TRANSIT MONITORING NETWORK -- LIST OF ROUTES

CONGESTED CORRIDORS & CMP ROADWAY NETWORK			TRANSIT MONITORING NETWORK				
	Operator	Line	Description	Operator	Line	Description	
<u>1 A SANTA MONICA FREEWAY CORRIDOR</u>							
	SCRTD	4/304	Santa Monica Blvd				
1	Palisades Beach Rd., Lincoln Blvd., Sepulveda	SCRTD	20/320	Wilshire	Culver City	6	Sepulveda
2	Lincoln Blvd., Santa Monica Blvd., Alvarado	SCRTD	28/27/328	Olympic	SCRTD	434	I10 PCH Exp.
10	SANTA MONICA FREEWAY	SCRTD	33/333	Venice	SCRTD	436	Venice I10 Exp.
90	MARINA FREEWAY	SCRTD	200	Alvarado	SCRTD	439	I10 Exp.
170	Highland Avenue	SCRTD	212	La Brea	Santa Monica	10	I10 Exp.
187	Venice Blvd.	Santa Monica	1	Santa Monica Blvd.	LADOT	430	I10 Exp.
	Wilshire Blvd.	Santa Monica	2	Wilshire	LADOT	431	I10 Exp.
	Olympic Blvd.	Santa Monica	3	Lincoln	LADOT	437	I10 Exp.
					LADOT	438	I10 Exp.
<u>1B SAN BERNARDINO/POMONA/ORANGE FREEWAY CORRIDOR</u>							
30	Baseline Rd., College St., FOOTHILL FREEWAY	SCRTD	18	Whittier	Foothill	495	160 Exp.
39	Beach Blvd., Azusa Ave., San Gabriel Canyon Rd.	SCRTD	70	Garvey	Foothill	498	I10 Exp.
57	ORANGE FREEWAY	SCRTD	76	Valley	Foothill	492	I10 Arrow Exp.
60	POMONA FREEWAY	Foothill	280	AZUSA	Foothill	494	Foothill I10 Exp.
66	Foothill Blvd.	SCRTD	480	I10 Exp.			
	Arrow Highway	SCRTD	482	(160) I10 Exp.			
	Azusa Ave.	SCRTD	484	Valley Blvd. Exp			
	Colina Rd.	SCRTD	486	I10 Exp.			
	Hacienda Blvd.	SCRTD	488	I10 Exp.			
	Holt Ave.	SCRTD	490	Rt. 57 I10 Exp.			
	Valley Blvd.	SCRTD	497	I10 Exp.			
	Garvey Ave.						
<u>2 SAN FERNANDO VALLEY/DOWNTOWN LA CORRIDOR</u>							
5	GOLDEN STATE FREEWAY	SCRTD	161	I101	LADOT	413	I5 Exp.
27	Topanga Canyon Blvd.	SCRTD	165	Victory	LADOT	419	Devonshire Exp.
101	VENTURA FREEWAY, HOLLYWOOD FREEWAY,	SCRTD	245	Topanga	LADOT	423	I101 Exp.

TABLE 4: CMP TRANSIT MONITORING NETWORK -- LIST OF ROUTES - (Continued)

CONGESTED CORRIDORS & CMP ROADWAY NETWORK		Operator	Line	TRANSIT MONITORING NETWORK			
				Description	Operator	Line	Description
	SANTA ANA FREEWAY (SPUR)	SCR TD	418	15 Exp.			
170	HOLLYWOOD FREEWAY	SCR TD	420	1101 Exp.			
	Ventura Blvd.	SCR TD	424	Ventura Exp.			
	Victory Blvd.	SCR TD	426	Topanga I5 Exp.			
	Devonshire St.	SCR TD	427	1101 Exp.			
	Sepulveda Blvd.						
<u>3 HARBOR FREEWAY CORRIDOR</u>							
47	Vincent Thomas Bridge, Henry Ford Ave.	SCR TD	81	Figueroa	Torrance	1	I110 Exp.
110	HARBOR FREEWAY	Gardena	2	Western	Torrance	2	I110 Exp.
213	Western Ave	SCR TD	443	I110 Exp.	Gardena	1	I110 Exp.
	S. Figueroa St.	SCR TD	445	I110 Exp.	LADOT	448	I110 Exp.
		SCR TD	446	I110 Exp.			
<u>4 SAN DIEGO FREEWAY CORRIDOR</u>							
		SCR TD	40	Hawthorne	SCR TD	442	Hawthorne Exp.
1	Pacific Coast Highway	SCR TD	232	Pacific Coast Hwy	SCR TD	444	Hawthorne Exp.
22	7th St., GARDEN GROVE FREEWAY	SCR TD	234	Sepulveda	SCR TD	560	Sepulveda Exp.
107	Hawthorne Blvd.	Torrance	3	Pacific Coast Hwy			
405	SAN DIEGO FREEWAY	Torrance	7	Sepulveda			
	Alamitos Ave.	Torrance	8	Hawthorne			
	Seventh St. (PCH - Alamitos)	Long Beach	90	7th Street			
	Shoreline Drive						
	Hawthorne Blvd.						
	Sepulveda Blvd. (PCH - I710)						
<u>5 VENTURA/FOOTHILL FREEWAY/WEST SAN GABRIEL VALLEY CORRIDOR</u>							
2	Glendale Ave., Angeles Crest Highway, Glendale	SCR TD	78/79/379	Huntington			
	FREEWAY	SCR TD	180/181	Colorado			
110	PASADENA FREEWAY	SCR TD	187	Foothill			
134	VENTURA FREEWAY	SCR TD	401	I110 Exp.			
210	FOOTHILL FREEWAY	SCR TD	483	I10 Exp.			

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Amended - See
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TABLE 4: CMP TRANSIT MONITORING NETWORK -- LIST OF ROUTES - (Continued)

CONGESTED CORRIDORS & CMP ROADWAY NETWORK		TRANSIT MONITORING NETWORK					
		Operator	Line	Description	Operator	Line	Description
	Alosta Ave. Colorado Blvd.	SCR TD	487	I10 Exp.			
	Colorado Blvd.	Foothill	690	I210 Exp.			
	Foothill Blvd.						
	Huntington Drive						
	N. Figueroa St.						
<u>6 SANTA ANA FREEWAY CORRIDOR</u>							
5	SANTA ANA FREEWAY	SCR TD	66	E. Olympic	SCR TD	470	Whittier
72	Whittier Blvd.	Montebello	10	Whittier	OC	721	15 Exp.
	Telegraph Rd.	SCR TD	460	15 Exp.	OC	701	15 Exp.
		SCR TD	462	15 Exp.			
		SCR TD	466	15 Exp.			
<u>7 SAN GABRIEL RIVER FREEWAY CORRIDOR</u>							
19	Rosemead Blvd., Lakewood Blvd	SCR TD	266	Rosemead			
164	Rosemead Blvd.						
605	SAN GABRIEL RIVER FREEWAY						
<u>8 ARTESIA FREEWAY CORRIDOR</u>							
42(105)	Manchester Blvd., Firestone Blvd.	SCR TD	115	Firestone			
91	Artesia Blvd., REDONDO BEACH, ARTESIA FREEWAY	SCR TD	120	Imperial			
	Imperial Highway						
<u>9 NORTH COUNTY CORRIDOR</u>							
14	ANTELOPE VALLEY FREEWAY	LA County SC	799	15 Rt. 126 Exp.			
48	Neenach Rd.	LA County AV	785	15 Rt. 14 Exp.			
118	SIMI VALLEY FREEWAY	LA County AV	787	15 Rt. 14 Exp.			
138	ANTELOPE VALLEY FREEWAY						

TABLE 4: CMP TRANSIT MONITORING NETWORK -- LIST OF ROUTES - (Continued)

CONGESTED CORRIDORS & CMP ROADWAY NETWORK		Operator	Line	TRANSIT MONITORING NETWORK			
				Description	Operator	Line	Description
<u>10 LONG BEACH FREEWAY CORRIDOR</u>							
47	Alameda St.	SCRTD	55	Alameda	Long Beach	60	Atlantic
103	TERMINAL ISLAND FREEWAY	SCRTD	60/360	Feeder	METRO	Blue Line	Light Rail
710	LONG BEACH FREEWAY	SCRTD	260	Atlantic	SCRTD	457	1710 Exp.
	Alameda Avenue	Long Beach	40	Feeder			
	Atlantic Blvd	Long Beach	50	Feeder			

discusses project reporting procedures for ensuring that transit impacts are considered throughout the local development process.

Transportation Demand Management (TDM) Element - As required by statute, the CMP includes a trip reduction and travel demand management element aimed at promoting alternative transportation methods. The CMP contains a description of existing TDM programs. Since each local jurisdiction is responsible for adopting and implementing a trip reduction and travel demand ordinance, the focus of the TDM Element is to identify a sample TDM ordinance with minimum TDM standards. The LACTC has revised the sample TDM ordinance, which focuses on design standards for new development. The sample ordinance includes minimum TDM measures necessary for local jurisdictions to be found in conformance with the CMP. Additional TDM measures are also identified in the TDM element for those local jurisdictions that are looking for guidance in developing a more aggressive TDM program. A copy of the latest revised sample ordinance is included in Appendix C.

Land Use Analysis Program - CMP statute requires that local jurisdictions adopt a land use program to analyze the impact of new development on the CMP system, and to estimate the cost of mitigating CMP related impacts. This element of the CMP defines a mechanism for ensuring that the impacts of local development projects on the CMP system are analyzed. The Land Use Analysis program requires that local jurisdictions, under existing CEQA requirements, analyze the regional transportation impacts of a development project in the project's EIR. The program is intended to expand information provided to local decision makers about regional transportation impacts, but leaves the authority for land use decisions at the local level. The program is based upon existing CEQA provisions, and calls for an expanded regional transportation impact analysis for projects preparing an EIR. In brief, the program would work as follows:

- Projects meeting the CEQA definition of "regionally significant", or otherwise required to prepare an EIR based on a local determination, will perform a CMP system impact analysis utilizing guidelines included in the final CMP. Utilizing the guidelines will result in standardizing the methodologies that are currently used.

- Jurisdictions choosing to utilize local traffic models may do so provided LACTC as the Congestion Management Agency (CMA) finds the model consistent with the standardized guidelines and the CMP model and data base currently under development.
- Projects which entered into a Development Agreement prior to July 10, 1989, and traffic generated by low and very low income housing projects are exempted. In addition, projects for which an NOP was issued before local adoption of the land use program will be exempt. The land use program must be adopted by local jurisdictions within 120 days of CMP adoption.
- The existing guidelines and requirements for EIR's contained in CEQA are relied upon. All existing CEQA requirements for EIR's related to NOP, scope and content of an EIR, determinations of significant effect, time limits, etc., continue to be the responsibility of the local jurisdiction. LACTC as the CMA becomes a "responsible agency". The local jurisdiction is required to inform the CMA of the proposed development project through the NOP process.
- The EIR for each project would also contain an identification and discussion of recommended mitigation measures. It would remain the discretion of the local jurisdiction to select the mitigation measures it deemed appropriate.
- The EIR for each project will also contain cost estimates for mitigation measures identified for CMP system impacts. The determination of whether or not to assess any mitigation cost would remain the discretion of the local jurisdiction.
- Local jurisdictions would self-monitor implementation of adopted CMP system impact related mitigation measures through the mitigation monitoring requirements contained in CEQA. The CMA monitors only to ensure that the local jurisdiction complies with CMP statute by adopting and implementing this local land use analysis program.

Capital Improvement Program Element - As required by statute, the CMP includes a seven year Capital Improvement Program (CIP) to maintain or improve the Level of Service on the CMP highway system, transit performance, and to mitigate regional transportation impacts

identified through the CMP land use analysis program. The CIP includes a list of specific improvements proposed for the regional system. The 1992 CMP CIP list consists of those new projects funded through the 1992 State Transportation Improvement Program (STIP) as well as those TSM projects recommended by the LACTC for State Traffic System Management funding included in Table 5. The full list of 1992 STIP projects is included as Appendix D.

For the purposes of environmental impact evaluation, the capital improvement program can generally be divided into the following broad categories:

1. Freeway System Management. System management projects improve the operation of existing freeways, while not substantially increasing the right-of-way requirements of these facilities. For example: High Occupancy Vehicle (HOV) lanes, traffic monitoring and incident management systems, driver information systems, and operational improvements such as lane restriping and ramp metering.
2. Freeway Gap Closures. Within the largely built environment of Los Angeles County, there exist a number of major travel corridors which are not currently served by freeway facilities. Freeway construction is proposed to close these "gaps" in the county's vehicular transportation system where high capacity facilities are required.
3. Arterial System Improvements. Improvements to the arterial street system include both capacity enhancements and operational improvements. Capacity enhancements increase the through carrying capacity of the arterial, such as widening or restriping to provide additional through lanes. Operational improvements improve the operation of an arterial without substantially increasing its through-carrying capacity, such as intersection improvements and signal synchronization.
4. Commuter Rail Stations, Transit Centers & Park-n-Ride Lots. Transfer facilities are a key component of an integrated multi-modal transportation system. These facilities allow passengers to transition between car, bus and rail modes by providing parking, drop-off and waiting areas.

TABLE 5: CAPITAL IMPROVEMENT PROGRAM

FUND SOURCE	PROJECT DESCRIPTION	CIP Project Category
FCR	Rte 30 at Foothill Blvd., construct interchange	3
FCR	Rte 30 from Padua to San Bernardino County Line, construct 6 lane fwy+2 carpool la	2
FCR	Rte 30 from Towne to Padua, construct 6 lane fwy+2 carpool lanes	2
FCR	Rte 105 at Monroe Ave, construct storm drain cost increase	1
FCR	Rte 105 from Mona Bl to State St, realign imperial hwy cost increase	3
FCR	Rte 105/710 Interchange, construct pump plant cost increase	1
FCR	Rte 110 Transitway, construction cost increase	1
FCR	Rte 110 Transitway, right of way cost increase	1
FCR	Rte 138 from Avenue T to Longview Rd, widen to 4 lanes	3
FCR	Rte 138 from 10th St West to 30th St East, widen to 6 lanes	3
FCR	Rte 210 at Fair Oaks Av, construct interchange cost increase	3
FCR	Rte 405 at Arbor Vitae, construct southern portion of interchange	3
FCR	Atlantic Blvd at Rte 5, modify "Mixmaster" intersection and fwy ramps	3
FCR	Chatsworth Commuter Rail Station, construct access road	4
FCR	Del Arno Blvd at Rte 405, construct overcrossing	3
FCR	Imperial Hwy at Wilmington Ave, construct rail/highway grade separation	6
FCR	Rosescrans/Aviation, widen intersection	3
FCR	Valley Blvd from Rte 710 to Santa Anita, widen intersections and roadway at selected locations	3
TSM	Rte 2 WB from Verdugo Bl to Rte 5 SB/Riverside Dr, install ramp metering, HOV bypass	1
TSM	Rte 10 at Arlington Av Westbound collector/distributor, restripe auxiliary lane	1
TSM	Rte 10 WB at Frazier St Interchange, restripe auxiliary lane	1
TSM	Rte 57/Rte 210 from Sunset Crossing Rd to Allen Av, install ramp metering, HOV bypass (phase I)	1
TSM	Rte 60 at Reservoir St, install ramp meter, HOV bypass	1
TSM	Rte 105, 110, 405, 605 & 710 at various locations, install Closed Circuit TV	1
TSM	Rte 210 from Rte 134 to Rte 30, widen ramps, intersection improvements (phase II)	1
TSM	Traffic Operations Center, upgrade (phase I)	1
TSM	Traffic Operations Center, SMART corridor direct ATSAC link	1
TSM	LA County Freeway System, at various locations, install Changeable Message Signs	1
TSM	Hawthorne Bl, from Imperial Hwy to Manhattan Beach and 244th St to Palos Verde Dr W, upgrade signals & intersections	3
TSM	Hollywood Fwy Corridor, install ATSAC area control system (stage I)	3
TSM	Hollywood Fwy Corridor, ATSAC area control system (stage III)	3
TSM	Huntington/Foothill/Alosta, Michillinda-Baseline, upgrade signals & interconnect	3
TSM	San Gabriel Bl from Rte 60 to Rte 10, signal coordination	3
TSM	Victory Corridor East, ATSAC area control system (stage I)	3
TSM	Washington Bl along Santa Monica Fwy (Rte 10), SMART street project	3

CIP Project Categories are as follows: (1) Freeway System Management; (2) Freeway Gap Closure, (3) Arterial System Improvements, (4) Commuter Rail Stations, Transit Centers & Park-n-Ride Lots; (5) Bus Improvements, (6) Rail Improvements, (7) Transportation Demand Management, (8) Alternative Mode Improvements

SOURCE: LACTC

5. Bus Improvements. Buses provide flexible service to broad geographic areas within the county, primarily on the highway system. Expansion of these services relieves overcrowding in high demand corridors, and increases the coverage of the system throughout the county.
6. Rail Improvements. Fixed rail transit provides high capacity, high speed transportation services. These lines can be further classified as urban rail, which serves the densely developed urban core, and commuter rail, which connects the urban core to outlying suburban communities.
7. Transportation Demand Management. TDM measures decrease the demands upon the transportation system by decreasing the demand for single-occupant automobile travel. These measures include the provision of facilities, such as telecommuting centers, as well as developing services such as organizations which match potential ridesharers.
8. Alternative Mode Improvements. Facilitating travel by non-vehicular modes can substantially decrease demands on the highway as well as the transit system. In particular, bicycle and pedestrian facility improvements serve and foster safe travel by these modes.

CMP Adoption Schedule

By statute, LACTC was given a one year extension to adopt the CMP because it was determined that an Environmental Impact Report was necessary.⁷ In accordance with the provisions of this extension, the LACTC must adopt the CMP by December 1, 1992. The CMP must be adopted by this date to ensure that the projects approved for the County of Los Angeles by the State in the 1992 State Transportation Improvement Program remain eligible for funding, and that local subventions that are available to local jurisdictions continue to flow.

⁷ Government Code Section 65082.

II.C. APPROVALS FOR WHICH THE EIR WILL BE USED

The Los Angeles County Transportation Commission will use this program level EIR as part of its review and approval of the CMP. Local jurisdictions may reference this EIR during TDM ordinance approval; and as part of environmental review, project approval, and EIR certification decisions for regionally significant projects. The SCAQMD may use this EIR as part of the approval of projects that measurably improve air quality. In addition to the above approvals, agencies approving projects listed in the CIP, and other regionally significant transportation projects, may use this EIR in evaluating proposed projects.

II.D. ENVIRONMENTAL REVIEW OF THE CONGESTION MANAGEMENT PROGRAM

Relationship to Past and Future Environmental Review

The CMP is required by law to be consistent with the RMP prepared by SCAG. The RMP includes transportation demand management strategies, transportation system management strategies, mixed-flow facilities, high-occupancy vehicle (HOV) facilities, a transit and inter-city rail program, non-motorized transportation strategies and financial strategies for accomplishing the plan. Improvement projects included in the CMP must be consistent with the RMP or SCAG may withhold them from inclusion in the Regional Transportation Improvement Program.

An Environmental Impact Report for the current RMP was prepared in 1988. The CMP EIR is tiered from the current RMP EIR. Tiering is a procedure where broad EIRs (such as those for general plans or policy statements such as the RMP) are followed by the preparation of either narrower EIRs for related plans or programs of lesser scope and/or site-specific EIRs. When tiering is used the subsequent EIRs incorporate by reference the general discussions contained in the earlier, broader EIR and concentrate on the issues specific to the project for which the subsequent EIR is being prepared.⁸ The Legislature specifically encourages the tiering of EIRs

⁸ CEQA Guidelines (Cal. Code of Regulations, Title 14), section 15385.

under CEQA in order to provide increased efficiency in the CEQA process. The RMP EIR is incorporated herein by reference.⁹

The land use analysis requirement contained in the CMP will help to ensure that local jurisdictions consider the regional transportation impacts of new development as part of their land use approval process. This will help to ensure that private and public projects are better able to comply with the CEQA requirement to consider the potential regional impacts of a project.

Individual improvement projects included in, or made necessary by, the CMP will be subject to CEQA environmental review requirements. The CMP EIR will serve as a program level EIR from which these CMP project level environmental assessments may be tiered.

Program EIR

The EIR for the CMP is a "program EIR," which under CEQA guidelines may be prepared for projects characterized as a series of actions that are parts in the chain of contemplated actions, in connection with the issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program.¹⁰ Under CEQA an EIR on a project, such as the adoption of a plan, should focus on the secondary effects that can be expected to follow from its adoption, but need not be as detailed as an EIR on the specific construction projects that might follow.¹¹ This program EIR, therefore, identifies general countywide effects of the proposed CMP, and identifies general areas of environmental sensitivity which, where necessary, can be evaluated in greater detail in project-specific EIRs.

⁹ Draft Environmental Impact Report Regarding the SCAG Regional Mobility Plan, October 1988 and the Final Environmental Impact Report Regarding the 1988 SCAG Regional Mobility Plan, December 1988. These documents are herein incorporated by reference and are summarized in relevant sections of this EIR. Copies of these documents are available for review at the LACTC located at 818 West Seventh Street, Los Angeles CA 90017, Suite 1100. Copies are available from SCAG, located at 818 West Seventh Street, 12 floor.

¹⁰ CEQA Guidelines (Cal. Code of Regulations, Title 14), section 15168.

¹¹ CEQA Guidelines (Cal. Code of Regulations, Title 14), section 15146.

III. ENVIRONMENTAL SETTING , IMPACTS AND MITIGATIONS

This chapter contains a discussion of the environmental setting, impacts, and mitigations associated with the potentially significant issue areas identified for the CMP. The issue areas, and the section of the chapter in which they appear, are listed below:

- III.A. Land Use
- III.B. Transportation
- III.C. Noise
- III.D. Air Quality
- III.E. Geology
- III.F. Water Resources
- III.G. Biological Resources
- III.H. Cultural Resources
- III.I. Public Services

Each of these issue areas is discussed in terms of the potential of the CMP to create both direct and indirect impacts. Direct impacts are the physical changes in the environment which could result from implementation of specific CMP program elements such as the CIP or TDM Ordinance. Indirect impacts are the potential effects of the program as a whole. These would include effects associated with land use analysis and mitigation impacts of the program.

III.A. LAND USE AND PLANNING

SETTING

Land use in the County of Los Angeles is governed by both regional and local plans. Regional planning for the six county region that makes up the greater Los Angeles area is carried out primarily by SCAG. In addition, several special districts are involved in planning at a regional level, among these is the SCAQMD which jointly develops the Air Quality Management Plan with SCAG.

III. Environmental Setting, Impacts and Mitigations

At the local level, planning for the unincorporated portion of the County is carried out by the County of Los Angeles. The unincorporated area consists of 2,697 square miles, or approximately 66% of the County's 4,083 square miles. Planning in the remaining 1,386 square miles is the responsibility of the 88 cities within Los Angeles County.

Regional Plans

SCAG is responsible for planning on a regional basis. The SCAG region consists of Los Angeles, Ventura, Orange, Imperial, Riverside and San Bernardino Counties. SCAG has developed several plans which address regional issues. Three plans which relate to the CMP are: the Regional Mobility Plan (RMP), the Air Quality Management Plan (AQMP) and the Growth Management Plan (GMP). These are discussed below.

Regional Mobility Plan

The RMP serves as the Regional Transportation Plan required under State and Federal statute. The RMP identifies the short and long range transportation needs of the region, and identifies policies, actions, and funding sources to meet these needs. In developing its RMP, SCAG must assess the impact that transportation improvements have on attaining air quality goals, and must find that the RMP is in conformance with the AQMP.

The goal of the adopted RMP is to maintain 1984 mobility levels. In order to accomplish this, the RMP identifies a series of improvements including the construction of new transportation facilities, transportation system management strategies to make most effect use of the existing transportation system, transportation demand management strategies to encourage ridesharing and other strategies that reduce the number of vehicle trips, and land use strategies to encourage shorter commute trips. The plans objectives are to:

- Maintain the freeway system at 450 miles of congestion (Level F) through 2010.
- Achieve a 19 percent transit share of home-to-work trips by 2010.
- Limit to 60 million miles the increase in daily vehicle miles traveled over the next 20 years.
- Limit the daily vehicle hours of travel at approximately 7,850,000.

III. Environmental Setting, Impacts and Mitigations

- Increase the number of people ridesharing to 1,610,000 by 2010.
- Eliminate 3 million daily home-to-work trips by 2010.
- Reduce transportation emissions back to 1987 levels by 2010.
- Fund the \$23.2 billion shortfall in highway, transit and demand management capital costs.
- Fund the \$2.9 billion annual shortfall in highway, transit and demand management operating costs.

The specific actions recommended under the Plan to achieve those goals are:

Transportation Demand Management (TDM): (1) eliminate 3 million daily work trips through work-at-home and telecommuting; (2) increase ridesharing to 1,610,000 daily work trips; (3) increase transit usage to 1,400,000 daily work trips; and (4) study the implementation of user charges for congestion, peak period use, tolls, parking, fuel taxes, and emission fees.

Transportation System Management (TSM): (1) increase ramp metering and High Occupancy Vehicle (HOV) bypass-lane programs; (2) promote advanced signalization and coordination of key intersections throughout the region; and (3) improve programs to monitor, control, and respond to traffic incidents.

Highway Improvement: (1) build 1,251 land-miles of HOV and transitway lanes; (2) build 1,846 lane-miles of additions to existing highways; and (3) protect rights-of-way for future use.

Transit Development: (1) work with county transportation commissions and operators to implement all projects within the financially constrained program; and (2) identify and create new sources of funds needed to complete the unconstrained program of transit development.

Both the RMP and anticipated transportation system performance as they relate to transportation planning in the County are described in additional detail in part III.B. of this EIR.

CMP statute requires that the CMP be developed consistent with the RMP and the adopted regional forecast. The CMP was developed keeping in mind this consistency requirement. The CMP has established a county-level process that will work toward the attainment of regional

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mobility goals identified in the RMP. The Capital Improvement Program projects of the CMP have been developed and evaluated through the RMP. The CMP has also established a process for recommending highway projects that are most effective at reducing congestion (i.e., high occupancy vehicle lane projects), for identifying the effectiveness of regional transit services and for establishing a Transportation Demand Management program that will work toward the attainment of the trip reduction goals of the RMP. The CMP will continue to be an important mechanism for identifying specific approaches at the county level that will be most effective in meeting regional mobility goals. Therefore, the CMP process will be closely coordinated with the development of the RMP.

Air Quality Management Plan

The purpose of the AQMP is to establish a comprehensive program which will result in the achievement of federal and state air quality standards. The South Coast Air Basin currently fails to meet the National Ambient Air Quality Standards or the California Clean Air Act (CCAA) standards for ozone, carbon monoxide, nitrogen dioxide and particulate-matter. The AQMP is jointly developed and adopted by SCAG and the SCAQMD.

The AQMP contains three tiers of control measures aimed at meeting the AQMP's air pollution reduction targets through the control of both mobile and stationary emission sources. Tier I measures are those measures that can be accomplished using existing technology. Tier II measures represent significant advancements in today's technology and Tier III measures call for the development of new technology. The Tier I measures which are Transportation Control Measures (TCMs) are listed in Table 6.

The AQMP is developed based on the adopted regional forecast, and transportation improvements included in the RMP must be found in conformance with the AQMP. While the CMP is not statutorily required to be in conformance with air quality requirements, the requirement to be consistent with the RMP means that transportation improvements identified in the CMP are working toward regional mobility goals as well as implementing projects and strategies necessary to work toward air quality attainment as well.

The 1991 AQMP update provides subregional Vehicle Miles Traveled (VMT) targets to be achieved through the RMP. In an effort to further simplify implementation of strategies aimed at

TABLE 6: AQMP TRANSPORTATION CONTROL MEASURES

<u>Control Measure</u>	
1.	Alternative Work Schedules, Locations and Non-Motorized Transportation
1a	Person Work Trip Reductions
1b	Non-Motorized Transportation
2.	Mode Shift Strategies
2a.	Employer Rideshare & Transit Incentives
2b.	Parking Management
2c.	Vanpool Purchase Incentives
2d.	Merchant Transportation Incentives
2e.	Auto Use Restrictions
2f.	HOV Facilities
2g.	Transit Movements
3.	Goods Movement
3a.	Truck Dispatching, Rescheduling & Rerouting
3b.	Diverting Port-Related Truck Traffic to Rail
4.	Traffic Flow Improvements
5.	Non recurrent Congestion
6.	Aircraft & Ground Service Vehicles
7.	Centralized Ground Power Systems
8.	Airport Ground Access
9.	Replacement of High-Emitting Aircraft
10.	General Aviation Vapor Recovery
11.	Rail Consolidation to Reduce Grade Crossings
12.	Paved and Unpaved Roads and Parking Lots
12a.	Paved Roads
12b.	Unpaved Roads
13.	Highway and Freeway Capacity Enhancements
14.	Railroad Electrification
15.	Electric Vehicles
16.	High Speed Rail
17.	Growth Management
H-2	Trip Reduction for Schools
H-3	Supplemental Development Standards
H-4	Special Activity Centers
H-5	Enhanced Regulation XV
H-6	Truck Programs
H-7	Registration Program

SOURCE: SCAG

III. Environmental Setting, Impacts and Mitigations

reducing trip-making in the region, SCAG and the SCAQMD are working on consolidating VMT and VT reductions goals into a single VT based goal.¹

Growth Management Plan

The Growth Management Plan evaluates socio-economic trends through the year 2010 and identifies the adopted regional forecast for the SCAG region. Both the RMP and AQMP were developed based on this forecast, and by statute, the CMP must also be developed consistent with the regional forecast.

In order to provide the transportation infrastructure necessary to meet forecasted growth patterns, the GMP calls for County Transportation Commissions to implement transportation projects consistent with the RMP, including the development of High Occupancy Vehicle lanes, the continued increases in the availability of transit, and continued efforts to reduce or eliminate trips through transportation demand management strategies. The GMP also recommends local consideration of land use patterns that minimize the length of commute trips.

SCAG has forecasted that the population of Los Angeles County by the year 2010 will reach over 10 million people. Table 7 identifies the adopted SCAG socio-economic forecast for each county within the SCAG region.

Local Plans

Land use control at the local level is exercised by the County of Los Angeles and the 88 cities located in the County.² Under state planning law, each city must adopt a comprehensive, long-term general plan to guide the physical development of both the city and any land outside the city's boundaries that it judges to relate to its planning.³ The General Plan is considered the "construction for all future developments within the city or county" to which any local decision

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¹ See the SCAQMD's "District Proposed Implementation Program" (Model Ordinance).

² A list of the 88 cities can be found in Table 1.

³ General Plan requirements are contained in Government Code Section 65300 et seq.

TABLE 7: SCAG REGIONAL FORECAST

County	2010 Population	2010 Employment	2010 Housing
Los Angeles	10,231,200	5,392,200	3,959,300
Orange	2,982,200	1,718,800	1,191,900
Riverside	1,815,800	626,500	816,200
San Bernardino	2,171,600	785,400	966,000
Ventura	915,200	365,600	332,200
Imperial	140,200	65,600	51,900

SOURCE: GMP; figures are from Table VI-1,2,3 of the GMP.

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affecting land use and development must conform.⁴ All general plans contain the following seven mandatory elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise and Safety. In addition, they may include any optional elements that a city chooses to adopt.

IMPACTS

Regional Mobility Plan

The CMP is required by law to be consistent with the RMP prepared by SCAG and SCAG is required to issue a consistency finding for the CMP. Improvement projects included in the CMP must be consistent with the RMP or SCAG may withhold them from inclusion in the Regional Transportation Improvement Program (RTIP), which is a necessary precursor to obtaining State and Federal funding for the projects through the State Transportation Improvement Program (STIP). In addition, SCAG has the responsibility for assessing that the CMP model and data base are consistent with the regional model. The necessary mechanisms for ensuring consistency are therefore part of the CMP legislation.

⁴ See *Citizens of Goleta Valley v. Board of Supervisors of the County of Santa Barbara*, 52 Cal. 3d 553 (1990).

III. Environmental Setting, Impacts and Mitigations

The first year CMP has been developed to work toward the implementation of transportation projects and strategies recommended in the RMP. The projects included in the first year CIP are consistent with the 1989 RMP. The capital improvement projects recommended for Flexible Congestion Relief (FCR) funding were found to be consistent with the 1989 Regional Mobility Plan at the SCAG Executive Committee meeting on December 5, 1991. The CMP includes a TDM element, which is complementary to SCAQMD's Regulation XV TDM ordinance, and which will thus help to further the TDM goals of the RMP. The definition of the CMP highway network and LOS standards is consistent with, and will help to further the RMP's objective of maintaining the freeway system at 450 miles of congestion (Level F) through 2010 and enhancing HOV lane use. The CMP provides both a mechanism for monitoring services on the CMP network, and a mechanism to help ensure that those portions of the CMP system currently operating at LOS E or above, will not degrade below LOS E, and that portions operating and LOS F, will not suffer further degradation. Similarly, the CMP's Land Use Analysis Program will help ensure that local jurisdictions consider the impact of land use decisions on the regional transportation system, thus potentially reducing network impacts resulting from land use development. The CMP transit element will help to maintain and improve the attractiveness of transit in the County, and is thus working toward the RMP's objective to achieve a 19 percent transit share of home-to-work trips by 2010.

Direct Impacts: The CMP has been designed to be consistent with the RMP, thus the CMP should have a positive direct impact on working toward the attainment of regional mobility goals.

Indirect Impacts: Critics of capacity improvements have argued that increasing system capacity encourages additional trips on the system, by reducing the costs (time and stress) associated with trip-making. These additional trips are referred to as latent demand. However, standard traffic modeling techniques do not indicate demand changes resulting from increased capacity, and there has been relatively little research to date with respect to the presence or magnitude of this potential effect. The recent sensitivity analysis conducted in conjunction with SCAG's 1991-1997 RTIP Clean Air Conformity Report suggested that travel demand is relatively inelastic with respect to system speed..⁵

⁵ Final Report. Conformity of SCAG's 1989 Regional Mobility Plan and SCAG's FY 1991/1997 Regional Transportation Improvement Program under the 1990 Clean Air Act Amendments, SCAG, September 1991.

Although the CMP does include capacity increasing measures, it is not expected to stimulate any potential "latent demand" which may be present in the County. CMP consistency with the RMP serves to minimize any changes in demand patterns or latent demand effect. The RMP is planned to address mobility needs based on SCAG's regional demand projections. Since the capacity improvements included in the CMP are consistent with the RMP, the CMP is not expected to significantly alter the RMP's analysis of transportation demand. Further, the CMP is designed only to maintain established levels of service, rather than to reduce congestion compared to existing conditions. Therefore, as increases in capacity will be filled by projected demand, excess capacity is not expected to be available to attract latent demand.

Air Quality Management Plan

Direct Impacts: As discussed more fully in Section III.C - Air Quality of this EIR, the CMP would help to improve regional air quality in the County. This is due to the fact that: (1) the CMP includes a provision for consultation with the SCAQMD to ensure the CMP is developed in accordance with the region's air quality goals; (2) formal air quality review of CIP projects is conducted by SCAG as part of RTIP development;⁶ (3) TDM strategies of the CMP work toward implementation of TCM measures; and (4) as discussed more fully in Section III.C, the 1992 CMP contains elements which contribute to TCM 2f, 2g, 4, and H-3.

Construction of individual CIP projects may result in localized air quality impacts. This potential is discussed in detail in Section III.C of this EIR.

Indirect Impacts: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have negative effect on air quality. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, as well as, in a more limited way, in the discussion of the Growth Management Plan which follows. The potential for the CMP to foster urban deconcentration, not anticipated in the regional plans, is considered negligible.

⁶ Formal air quality review of 1992 CMP CIP projects will be conducted as part of the Regional Transportation Improvement Program in the Summer of 1992.

III. Environmental Setting, Impacts and Mitigations

CMP-related improvements could have the effect of increasing vehicle miles traveled as a result of latent demand with a concomitant increase in air quality emissions. However, as previously discussed, this potential is considered negligible.

CMP-related improvements could potentially increase the density of trips and traffic in center areas such as near transportation centers, rail transit stations, park and ride lots, etc. In these cases, the air quality affect of the CMP could create "hot spots" of pollutant concentrations, particularly carbon monoxide.

Growth Management Plan

The CMP is required to be consistent with the adopted regional forecast and these forecasts were considered in developing the program.

Direct Impacts: Individual CIP projects may result in localized changes in land use. As explained in greater detail in Chapter IV as part of the growth inducing impacts discussion, the CMP is not anticipated to affect the distribution of population and employment at the SCAG sub-regional level over the 20 year planning horizon.

Indirect Effects: The potential for the CMP to result in a distribution of population and employment which is significantly different than the policy forecast contained in the GMP is discussed in detail in the growth inducing impacts section of Chapter IV. - Impact Overview, where it is concluded that the CMP's potential to create a land use pattern which is inconsistent with the policy forecast is negligible. The reasons for this are as follows: (1) although deconcentration, is in part, a function of system mobility, the policy forecast anticipates the levels of mobility to be achieved by the RMP - the CMP alone would not achieve as great a mobility level as the RMP which has a goal of maintaining 1984 mobility levels; (2) the affects of the CMP on land use decisions are minimal when compared to market forces such as the desire to purchase affordable housing and the desire to maintain a quality of life which avoids the consequences of urban development; (3) the CMP's TDM element and transit related capital improvements will help to make transit more attractive, which would lessen the rate of deconcentration by reducing the attractiveness of the automobile as the major form of transportation, and by increasing the attractiveness of transit; (4) the LOS standards of the CMP are the same as those established by the region's other CMA's. The CMP, therefore, should not result in a level of service which is greater than under the RMP, or which is substantially

different than maintained in the other counties in the region. No significant deconcentration effects are thus anticipated to result from the CMP.

Local Plans

Direct Impacts: Land use impacts associated with the CMP would be generally as described in the RMP EIR,⁷ and would include: potential community disruption and displacement; changes in community character; community revitalization effects; personal mobility and accessibility effects; and transportation opportunities for special groups such as the elderly, the handicapped and low-income households.

The following classes of CMP CIP projects could lead to the localized displacement of adjacent businesses and residences: Class 1 - freeway system management (specifically the construction of HOV lanes); Class 2 - freeway gap closures; Class 6 - rail improvements; Class 4 - commuter rail stations; transit centers and park-n-ride lots; and, to a more limited degree, Class 3 - arterial system improvements. Of the CIP categories, Class 2, 3 and 6 projects present the greatest potential for disruption. These projects have received previous review at a program level as part of the RMP EIR. The potential for community displacement will also be evaluated as part of the project level environmental review conducted for individual CIP projects. The RMP EIR includes the following mitigation measures for community displacement:

- Select route alignments, locations for supporting facilities, and design features that minimize displacement of residences and businesses. Route alignments for transit guideways should strongly consider use of existing transportation right-of-way, such as highways and railways, in order to avoid or minimize displacement. Design features should consider use of depressed, elevated or underground facilities, and reduction in width of new right-of-way where significant displacement is a possibility.
- Where displacement is unavoidable, relocate displaces in accordance with state and federal laws (Uniform Relocation and Real Property Acquisition Policies Act), which provide for monetary compensation for acquired properties, moving expense payments, supplemental payments for replacement housing (or rentals), and relocation assistance.

⁷ Please see section 4J (pages 113 to 124) of the Draft Environmental Impact Report for the Regional Mobility Plan, October 1989 which describes the Social Impacts.

III. Environmental Setting, Impacts and Mitigations

- Avoid protracted waiting periods between right-of-way designation, property taking and construction, in order to minimize potential neighborhood deterioration due to neglected maintenance, early move-outs, vandalism and value losses.
- Provide housing adequate to meet potential housing shortages created by right-of-way acquisition by providing new or rehabilitated housing, or relocation of housing from acquired right-of-way.
- Construction of CMP CIP projects are also likely to disrupt the normal activities of neighboring land uses because of traffic reroutings, traffic congestion, restricted access to nearby businesses, restricted parking, interference with pedestrian and vehicular circulation, visual unsightliness, and dust, noise and fumes generated by construction. These would be short-term impacts of the CMP.

The RMP EIR includes the following mitigation measures for community disruption:

- Use construction techniques that minimize disruption effects of facility construction.
- Select route alignments and design features that minimize barrier effects within communities. Use street and pedestrian over and underpasses where possible to avoid broken linkages in local access. Minimize at-grade crossing of transit facilities and other local traffic, and/or utilize transportation engineering measures to minimize traffic delays. Use existing physical barriers such as highways and railways for future facility development to the extent possible.
- Through the general plan, zoning and subdivision process seek to achieve a satisfactory relationship between transportation development, and current and future development plans. Maximize redevelopment opportunities resulting from new facilities.
- Minimize increased congestion from autos and buses accessing transit stations, centers and parking lots through proper location and design of facilities, and traffic engineering.

The RMP EIR includes the following mitigation measures for accessibility/mobility impacts:

- Maximize connectivity between transportation service area boundaries and different modal systems through intermodal transfers and intersystem schedule coordination.

III. Environmental Setting, Impacts and Mitigations

- Establish transit fare structures that encourage use of new transit facilities by the elderly and handicapped.
- Use vehicle and station design measures that assure maximum use of transit guideway facilities by the handicapped.
- Continue expansion of paratransit and local bus service in conjunction with transit guideway development to provide maximum service to the elderly and handicapped.

Under the CMP local jurisdictions remain responsible for adoption and implementation of a program to analyze the impacts of land use decisions on the regional transportation system. However, the CMP's Land Use Analysis Program, in combination with CMP network monitoring and modeling should provide better information on which local jurisdictions can base their analysis. This would be a benefit of the CMP.

Indirect Impacts: A number of local land use plans include goals related to the development of higher density mixed use centers.⁸ A potential benefit of CIP transit projects, the CMP's transit network element, and the CMP's TDM component may be increases in density in the vicinity of transit centers and rail facilities. This would be supportive of the centers development goals of a number of local jurisdictions.

MITIGATIONS

The following are mitigation measures to reduce the potential direct and indirect impacts of the CMP:

- A.1 The LACTC shall consult with other adjacent CMAs in reviewing LOS standards to ensure that differences in LOS standards between counties do not encourage a land use pattern which is inconsistent with local land use and regional goals.

⁸ See for example the Land Use Element of the Los Angeles County General Plan or the Concept Los Angeles portion of the City of Los Angeles' General Plan.

III. Environmental Setting, Impacts and Mitigations

- A.2 The LACTC shall continue to participate in on-going forums with Southern California Congestion Management Agencies and SCAG, regarding interjurisdictional impacts including land use issues and impact analysis procedures.
- A.3 The LACTC shall investigate the use of other mobility and system performance indices such as Vehicle Miles Traveled and Average Vehicle Ridership and shall compare the effectiveness of such indices with LOS as standards for determining both system mobility and motor vehicle emissions performance. These supplemental measures shall be incorporated into the program if determined to be effective for reconciling localized decreases in service against regional improvements.

Implementation of mitigation measure A.3 would also mitigate potential indirect impacts associated with latent demand.

Mitigation measures for localized CIP project air quality impacts are contained in Section III.C of this EIR.

Implementation of mitigation measures A.1 and A.2 would mitigate potential indirect air quality impacts associated with the CMP's potential to affect deconcentration.

Implementation of the following mitigation measures will mitigate the direct local land use impacts of the CMP:

- A.4 The LACTC shall review project-level EIR's for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the land use impacts of individual CMP CIP Projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations.

In addition to mitigation measures A.2 and A.3, implementation of the following mitigation measure would mitigate the indirect local land use impacts of the CMP:

- A.5 The LACTC shall explore with the cities the desirability of including mechanisms in the CMP for encouraging the creation of increased density in targeted centers areas. Possible

mechanisms include specification of density related CIP project selection criteria; inclusion of density encouraging mechanisms in the TDM component of the CMP; or inclusion of mechanisms to encourage targeted density development as a component of future deficiency planning.

ADVERSE IMPACTS

With the exception of potential CIP project specific community displacement and disruption impacts, land use impacts can be mitigated to a level which is less than significant through implementation of the mitigation measures specified above. The potential for significant adverse land use impacts to remain after implementation of CIP project specific mitigations developed as part of CIP project specific environmental review, can only be assessed on a project specific basis. The CMP would have a beneficial impact on the implementation of the RMP.

III.B. TRANSPORTATION

SETTING

The Los Angeles County transportation system is a central part of the regional six-county SCAG network. The CMP is designed to be consistent with the RMP. Therefore it is relevant to expect that the system-wide performance indicators used to assess the effect of the RMP can also be used to assess the projected effectiveness of the CMP. The current system performance of the regional system has been quantified by SCAG and includes several indicators. **Table 8** summarizes this information for the entire six-county SCAG region which the RMP addresses. **Figure 5** in Chapter II shows the existing levels of congestion on the system. As indicated in **Table 8**, using 1987 conditions as the Existing Base, it is estimated that the six-county system supports travel demands of approximately 243,339,000 daily vehicles miles of travel (VMT) and 7,454,000 daily vehicle hours of travel (VHT). Travelers experience an estimated 1,136,000 hours of delay per day, representing 15 percent of the total VHT. Average daily speeds are estimated at 33 miles per hour (mph) on all facilities and 43 mph on freeways. Home-to-work transit ridership totals 482,000 trips per day, which represents approximately 6.0 percent of the total daily home-to-work trips.

**TABLE 8: 1988 REGIONAL MOBILITY PLAN; PERFORMANCE INDICATORS
SCAG SIX-COUNTY URBAN REGION**

Criterion	1987 Base ^a	2010 Without Plan ^b	2010 With Plan ^b
Travel			
Daily Vehicle Miles (1,000 VMT)	243,339	376,187	284,328
Daily Vehicle Hours (1,000 VHT)	7,454	19,577	7,850
Delay			
Daily Hours of Delay (1,000)	1,136	10,132	899
Percent of Daily VHT	15%	52%	11%
Average Daily Speed (mph)			
All facilities	33	19	36
Freeways	43	24	45
Congested Facilities (miles)			
AM Peak	n/a	2,564	280
PM Peak	n/a	4,567	612
Transit Ridership			
Daily Home-to-Work Trips (1,000)	482	527	1,401
Percent of Daily Home-to-Work Trips	6.0%	5.1%	19.4%

Notes:

- a. Source: SCAG, 1987 Base Year Travel Information Digest for the Southern California Region, December 1990.
- b. Source: SCAG, Draft Environmental Impact Report 1988 SCAG Regional Mobility Plan, October 1988.

The CMP addresses mobility for Los Angeles County, one of the six RMP counties. Los Angeles County is an urbanized county with a large and diverse population (8,863,164 persons in 1990 according to census data) which is expected to approach 10 million by year 2010. These nearly 9 million residents include 5,402,342 licensed drivers who operate 5,229,790 registered vehicles. The transportation system in Los Angeles County is designed to provide the following existing elements:

Highway System - The highway system in Los Angeles County is comprehensive and diverse. It includes a hierarchy of facilities that include freeways and major arterials that provide regional access, primary and secondary arterials that provide local access and circulation, and high occupancy vehicle (HOV) facilities that improve the flow of traffic for these vehicles. The inventory of facilities within in the Los Angeles County highway system are listed in Table 9.

Amended - See
ERRATA Notes

In addition to these existing facilities, major construction projects are on-going to complete the system. The following facilities are currently under construction:

- I-210 (Foothill Freeway) HOV lane
- I-105 (Glen Anderson Freeway): Norwalk to El Segundo
- I-110 (Harbor Freeway) Transitway
- I-405 (San Diego Freeway) HOV Lane

Another key component of the Los Angeles County freeway system is the recently implemented Metro Freeway Service Patrol. The service patrol assists motorists who are stalled or in accidents off of the freeways to access repair facilities. The system is designed to provide a dual service by assisting motorists and also by enhancing the flow of traffic on the freeways by keeping them clear of obstruction, especially during peak periods of commuting. The following summarizes key statistics of this program based upon surveys of those vehicles assisted during the period between September 30, 1991 to April 17, 1992:

- 91% of all accidents or stalled vehicles received assistance in 15 minutes or less.
- 30% of vehicles required towing.
- 76% of assisted vehicles were found on the right shoulder, 6% on the left shoulder, 11% in freeway lanes, and 4% on ramps (3% other).
- Incident type: 31% mechanical, 15% out of gas, 14% electrical, 14% other, 11% overheated, 8% flat tire, 4% accident, 3% debris removal.
- Types of vehicles assisted: 68% automobile, 24% light vehicles, 5% large trucks, 3% other.

Bus Transit - An extensive bus system that provides local, express and special services is currently in operation, with expansion of each element planned. Fixed-route services are provided by the Southern California Rapid Transit District (the regional transit operator), nine

III. Environmental Setting, Impacts and Mitigations

TABLE 9: DESCRIPTION OF EXISTING HIGHWAY SYSTEM COMPONENTS

<u>Facility</u>	<u>Miles</u>	<u>Lane Miles</u>	<u>Avg. Speed</u>
Freeway	514	3,955	39 mph
Major/Primary	2,704	15,676	25
Arterial			
Secondary Arterial	961	4,767	25
HOV Lanes	45	45	48

SOURCE: Kaku Associates

municipal operators (Commerce, Culver City, Gardena, Long Beach, Montebello, Norwalk, Santa Monica, Santa Clarita, and Torrance), the City of Los Angeles, Los Angeles County, Foothill Transit and Antelope Valley Transit. These nine transit operators have a combined fleet of about 2,580 buses (includes 90 vehicle dial-a-ride peak fleet) and provide service for about 1.4 million passengers per day on about 506 routes. In addition, over 50 cities provide community and shuttle services.

Rail Transit - An extensive rail transit system is currently being developed for Los Angeles County. When completed, the rail program for Los Angeles County will include regional commuter service, local access, and local circulation, will be both diverse and comprehensive. Table 10 described the components of the system which are currently operational or under construction.

Commuter Rail - Three regional commuter rail lines that join outlying areas to the Los Angeles CBD are expected to commence operation in late 1992. They are San Bernardino to Los Angeles, Moorpark to Los Angeles, and Santa Clarita to Los Angeles. Several other commuter rail lines are in the planning stages.

Transportation Demand Management - The SCAQMD has adopted Regulation XV, which currently requires all employers of 100 or more employees to develop and implement a TDM

TABLE 10: RAIL TRANSIT SYSTEM COMPONENTS

Line	Metro Blue Line	Metro Green Line	Metro Red Line Segment 1	Metro Red Line Segment 2
Location	Connects Long Beach to Los Angeles	Connects Norwalk to El Segundo, with a 3.5 mile "South Coast" branch extending south from Aviation/Imperial into El Segundo and ending at Freeman/Marine in Redondo Beach, and a "North Coast" branch to LAX and Westchester.	Connects Union Station to Wilshire/Alvarado	Connects Wilshire Section from Alvarado, to Western ;and Hollywood Section to Hollywood and Vine.
Length	22 miles (21.5 on the surface and 1/2 in tunnel)	23 miles	4.4 miles	6.7 miles
No. of Stations	22	16	5	8
Estimated Passengers per day	31,000 per day, currently	25,000 daily in 1995, 48,000 daily in 2010		
Maximum Speed (in MPH)	55	65	70	70
Car Carrying Capacity	150 people	150 people	170 people	170 people
Technology	Light Rail	Automated Light Rail	Heavy Rail subway	Heavy Rail subway
Status	In Operation	Under Construction Estimated opening date: 1995. Dependent on opening of I-105 Freeway.	Construction completed, undergoing testing. Estimated opening date June 1993.	Under construction Estimated opening date Wilshire Section: 1996; Hollywood Section 1998.

plan that is designed to achieve a specific ratio of employees to auto vehicle trips, average vehicle ridership (AVR) to the site. The AVR goal varies according to location within the South Coast Air Basin; for example, the largest AVR in the Los Angeles CBD is 1.75.

A variety of transportation demand management strategies are currently being utilized throughout the region to achieve the goals of Regulation XV. These include disincentives to drive-alone vehicle trips and incentives to encourage use of other modes of transportation such as carpool/vanpools, mass transit, and even bicycles. A key element of the program is the transportation infrastructure necessary to support these various incentives. The bus services, the rail system, and the system of HOV facilities form the base of this infrastructure. Important additions include the system of park-and-ride lots and bikeways. There are currently about 99 park-and-ride lots in Los Angeles County providing a total of about 11,763 spaces. The bikeway system in Los Angeles County includes about 500 miles of bikeways.

IMPACTS

The CMP is designed to be consistent with the RMP. The CMP represents one of the procedural steps towards full implementation of the RMP and the realization of the future conditions projected under the RMP program. The RMP EIR includes consideration of all RMP highway and transit improvements as well RMP TDM/mode split assumptions regarding reduction of person and vehicle trips. As such, it is appropriate to review the system-wide performance indicators used to assess the effect of the RMP in the RMP EIR. Table 8 indicates that although overall vehicular travel is expected to increase between the 1987 Base Year and Year 2010 with or without the RMP, delay is projected to decrease and average speeds are expected to increase with the RMP. When compared to conditions without the plan, the RMP would result in overall system-wide conditions with a significant reduction in total miles traveled, delay, and miles of congested facilities. The RMP would result in a significant increase in average speeds on all facilities including freeways. The transit ridership is expected to increase from the 1987 level of six percent of all home-to-work trips to an RMP level of 19.4 percent. The CMP, by implementing projects identified in the RMP and furthering RMP goals, will contribute to these beneficial impacts.

The CMP is intended to be part of the overall process required to plan, program, fund and implement transportation improvement projects within Los Angeles County. While, the CMP itself would not create direct transportation impacts, potential impacts could be created by the actual implementation of projects which are included in the CMP list of capital improvements. As detailed below, since the purpose of the CMP is to maintain mobility through transportation improvements that reduce vehicle trips (HOV lanes, transit, TDM), it can be expected that the majority of the transportation system impacts would be beneficial. This would be particularly true from a system-wide or region-wide perspective. The primary exception may be at the local level where impacts may result from the implementation of specific transportation improvements (such as construction impacts, increased traffic in the vicinity of transit stations, or traffic in residential neighborhoods attempting to access a regional highway facility). However, these individual projects would be subject to subsequent environmental review prior to implementation, as appropriate.

CMP Highway and Roadway System Element

The CMP highway network consists of all state highways and regionally significant arterials within the county, including approximately 500 miles of state freeways, 400 miles of state arterials and 100 miles of local arterials. The specific facilities included in the network were illustrated previously on Figure 4 and listed on Table 3.

The CMP highway element establishes LOS E as the LOS standard for the CMP highway network, except at locations where the 1992 base year LOS is worse than E (in which case the base year LOS is the standard). Although the CMP LOS standards allow uncongested facilities to reach LOS E, allowing potential LOS deterioration compared to existing conditions, the CMP provides assistance in maintaining levels of service standards through improved TDM measures and gas tax funds. Land use decisions remain under the control of local jurisdictions, which can pursue LOS standards through the CEQA process.

Direct Impacts: Any potential impacts of the highway and roadway element of the CMP are likely to be related to the implementation of the specific improvement projects within the framework of the CMP process.

Indirect Impacts - Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on the transportation system by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible. CMP related improvements could have the effect of increasing vehicle miles traveled as a result of latent demand. However, this potential is considered negligible. Highway LOS standards could also result in an emphasis on highway-related mitigation and de-emphasis of transit, demand reduction and other mitigation measures. This would generate inconsistencies with other regional plans.

CMP Transit Element

The CMP transit monitoring network consists of selected transit routes which provide regionally significant transit service and includes 90 existing bus routes, the Metro Blue Line and several bus feeders to rail station services. The specific routes included in the network were illustrated previously on **Figure 6** and listed on **Table 4**. The CMP also includes provisions for the addition of new transit routes to the CMP transit monitoring network in future years.

The CMP transit element also establishes transit routing and frequency standards in broad congested corridors as well as standards for coordination of transit services provided by separate operators. The transit routing and frequency standards are based on the current service levels along the routes included in the transit network. The coordination standards are based on and reaffirm standards previously established by the LACTC for all transit funding recipients and thus would not create new impacts.

Direct Impacts: As with the highway and roadway element, the transit element would provide monitoring information to assist in the planning of transportation improvements that would improve conditions and thus have a beneficial effect on a regional or area-wide basis.

Indirect Impacts: To the degree that improved information leads to transit improvements, this element would have a beneficial impact in that it would result in a comparative increase in transit ridership thereby reducing VMT and VT and their associated impacts.

TDM Element

Under the CMP local jurisdictions are required to adopt a TDM Ordinance. The CMP TDM model ordinance is intended to specify the mandatory components of local ordinances. Cities have the option to include additional measures at their discretion. The CMP TDM model ordinance is distinct from the SCAQMD's Regulation XV in two key ways. First, the CMP TDM model ordinance is directed at the requirements of the facility, for example, an entire office building, while Regulation XV is directed at the performance of the individual employer. In this way the CMP TDM element acts in support of the SCAQMD regulation rather than adding new requirements to Regulation XV. Second, the model ordinance requires that as part of EIR preparation for public or private development projects, consultation with the regional and municipal fixed route transit operators providing service to the development site occur.

Direct Impacts: Because Regulation XV is already in existence, any potential impacts related to social adjustments to comply with rideshare requirements are not associated with the CMP TDM element. The transit operator consultation requirement is anticipated to have a beneficial impact on transit services as a result of improved information on potential transit impacts being incorporated into EIRs for development projects. Facility design that creates the opportunity for car/van pooling, transit use and other alternatives to the single occupancy automobile will have a positive impact on congestion and air quality, reducing both vehicle trips and vehicle miles traveled.

Indirect Impacts: To the degree that this element reduces VMT and VT it would have a beneficial impact on air quality, transportation and noise.

Land Use Analysis Program

The Land Use Analysis Program builds on the conditions established by CEQA in that it will require local jurisdictions to consider regional transportation impacts of new developments and specifies the analytic method for this evaluation.

Direct Impacts: No direct impacts are anticipated to occur as a result of this component.

Indirect Impacts: The land use program will result in the identification of the regional impacts of new developments on the CMP system (i.e., transportation improvements). Such analysis could serve to minimize trips on the CMP system and encourage alternative uses, as well as to encourage development patterns which reduce trips, which would in turn, result in beneficial impacts on the regional highway and transit systems.

Capital Improvement Program Element

The 1992 (first year) CMP Capital Improvement Program (CIP) consists of those projects already approved for State funding in the 1992 State Transportation Improvement Program (STIP). As such, the 1992 CMP CIP has been reviewed for air quality conformity by SCAG and found to be consistent with the 1989 Regional Mobility Plan (RMP). The projects included in the CMP CIP are included in the Regional Transportation Improvement Program (RTIP), a seven-year, multi-modal program of regional transportation improvements for highway and transit.

Direct Impacts: CIP projects are a subset of the capital improvement projects analyzed in the RMP EIR. As previously discussed, the RMP analysis indicates that the projects would have a beneficial impact at a regional level.

The most common potential impact associated with the CIP element would be generated by the re-routing of traffic during the construction of the facility. This is normally a very localized effect. It is also possible that the implementation of a transportation improvement project may cause traffic to be diverted into or through sensitive areas including residential neighborhoods creating localized noise or air quality impacts. These are discussed in Sections III.D and III.C of this chapter respectively. In addition, as detailed in Section III.A, CIP project construction could lead to community dislocation. Mitigations included in the RMP EIR for these impacts are detailed in Section III.A of this chapter.

Indirect Impacts: CIP projects would improve mobility resulting in the negligible deconcentration and latent demand effects previously described for the CMP highway system element.

MITIGATION MEASURES

Mitigation measures A.1 - A.3 repeated below and mitigation B.1 would mitigate the indirect effects of the CMP Highway and Roadway System element.

- A.1 The LACTC shall consult with other adjacent CMAs in reviewing LOS standards to ensure that differences in LOS standards between counties do not encourage a land use pattern which is inconsistent with local land use and regional goals.
- A.2 The LACTC shall continue to participate in on-going forums with Southern California Congestion Management Agencies and SCAG, regarding interjurisdictional impacts including land use issues and impact analysis procedures.
- A.3 The LACTC shall investigate the use of other mobility and system performance indices such as Vehicle Miles Traveled and Average Vehicle Ridership and shall compare the effectiveness of such indices with LOS as standards for determining both system mobility and motor vehicle emissions performance. These supplemental measures shall be incorporated into the program if determined to be effective for reconciling localized decreases in service against regional improvements.
- B.1 The LACTC shall review EIRs for CIP projects to ensure that mitigation measures are included requiring that the Lead Agency give transit operators and affected City Departments of Transportation advanced notice of construction activities which might impact the transportation system.

Mitigation measure A.4 repeated below would mitigate the direct effects of the CIP element of the CMP.

- A.4 The LACTC shall review project-level EIR's for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the land use impacts of individual CMP CIP Projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations.

ADVERSE IMPACTS

On a program level the CMP would have a beneficial impact on the transportation system. Individual CIP projects may result in localized adverse traffic impacts as a result of construction and operation, which would not be significant at a regional level. The transit network and TDM elements of the program would result in increased transit use which would be a beneficial impact of the project. Thus, no adverse transportation impacts would result from the CMP at a regional level. The potential for localized CMP CIP project specific traffic impacts to remain after implementation of CIP project specific mitigations developed as part of CIP project specific environmental review can only be assessed on a project specific basis.

III.C AIR QUALITY

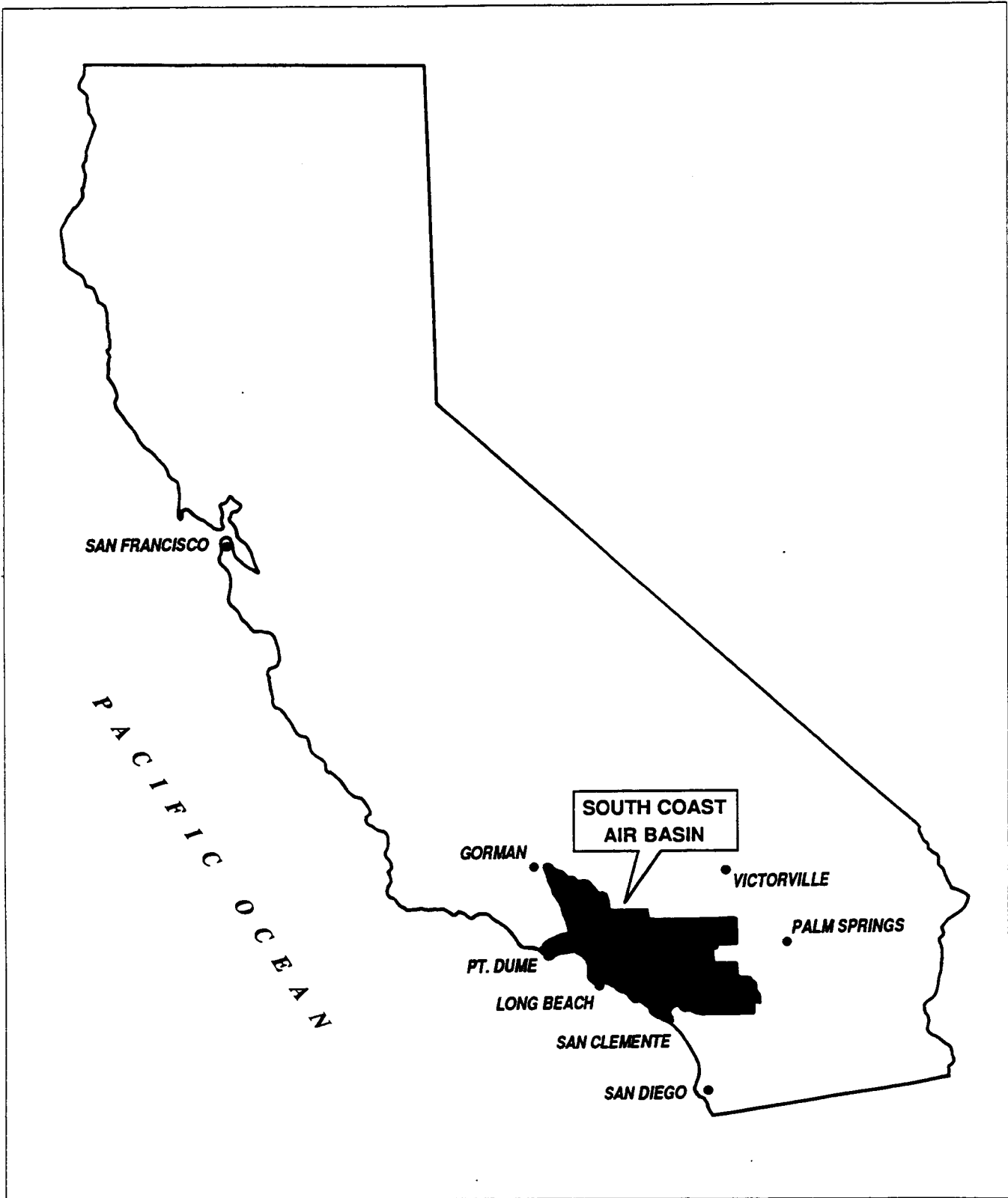
SETTING

South Coast Air Basin

The proposed project is located within the South Coast Air Basin (SCAB). The SCAB consists of the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County. Its area is approximately 6,600 square miles. The Los Angeles County portion encompasses approximately 40 percent of the basin area (2,400 square miles). The SCAB is bounded on the west by the Pacific Ocean, on the north and east by the San Gabriel, San Bernardino, and San Jacinto Mountains, and on the south by the San Diego County line (Figure 7).

The basin is a coastal plain with connecting broad valleys and low hills. On most days the net wind flow is from west to east. This produces the effect of having source areas near the coast impacting receptor areas inland to the east, and this source-receptor relationship is further compounded by the population distribution in the basin where the greatest population density and the majority of industries, commerce, streets and freeways are located in the principal source areas in the western portion of the basin.

Ambient pollution concentrations in Los Angeles County are among the highest in the four counties comprising the SCAB. In the winter, air quality problems are created due to carbon monoxide and



SOURCE: Terry Hayes & Associates.

Los Angeles County Congestion Management Program / 91578 ■

Figure 7
South Coast Air Basin's Location

nitrogen dioxide emissions. Summer air quality problems result from the formation of photochemical smog as hydrocarbons and nitrogen dioxide react under strong sunlight. Los Angeles County has been designated as a non-attainment area by the United States Environmental Protection Agency (EPA) under provisions of the Clean Air Act for ozone, carbon monoxide, nitrogen dioxide and total suspended particulates. Los Angeles County is designated an attainment area for sulfur dioxide.

General Air Quality Conditions in Los Angeles County

The County of Los Angeles has been subdivided into 15 source receptor areas (see **Table 11**, and **Figure 8**) by the SCAQMD. Air monitoring stations located in these designated areas compile data on air pollutants every year. Carbon Monoxide (CO), Sulfur Dioxide (SO₂), Nitrogen Dioxide (NO₂), Ozone (O₃), and Suspended Particulate Matter (PM₁₀) are major air pollutants regulated by Federal and State laws and monitored by these stations in the region. **Figures 9 and 10** illustrate the relationship of the project area to basinwide pollution patterns for carbon monoxide, ozone, nitrogen dioxide and particulates. Atmospheric concentrations of these pollutants are compared to state and federal standards for the years 1987 to 1991.

Carbon Monoxide (CO) -Carbon Monoxide is a colorless, odorless gas pollutant emitted primarily from vehicles (mobile sources) using carbon-containing fuels, such as gasoline. Carbon Monoxide concentrations are generally higher in the vicinity and downwind of areas with dense vehicular traffic. Stationary sources are identified as power plants, industrial operations, etc. Ships, railroads, and aircraft are other significant sources of emissions. Carbon monoxide is a primary (directly emitted) pollutant, unlike ozone and other secondary pollutants. High concentrations of carbon monoxide are recorded mostly in winter months in light wind conditions with surface inversions. In Los Angeles County, during the period 1987 to 1991, the maximum 1-hour concentration ranged from 7.0 ppm to 32.0 ppm (see **Figure 11**). South Central Los Angeles (Lynwood) and Southwest Coastal (Hawthorn) areas recorded highest 8-hour average carbon monoxide concentration in the region, ranging from 16.8 ppm to 32.0 ppm and 11.3 ppm to 16.4 ppm, respectively (see **Figure 12**). The highest recorded 8-Hour average in Lynwood was 32.0 ppm in the year 1988. Hawthorne recorded 16.4 ppm in the year 1989. However, in 1991 Lynwood (17.4 ppm) and Reseda (13.5 ppm) both recorded high concentrations of carbon monoxide, due to the regional industrial, commercial, and residential mobility and structural changes within the region inconsistent with decreasing carbon monoxide concentration in the Los Angeles County. The Southwest Coastal area

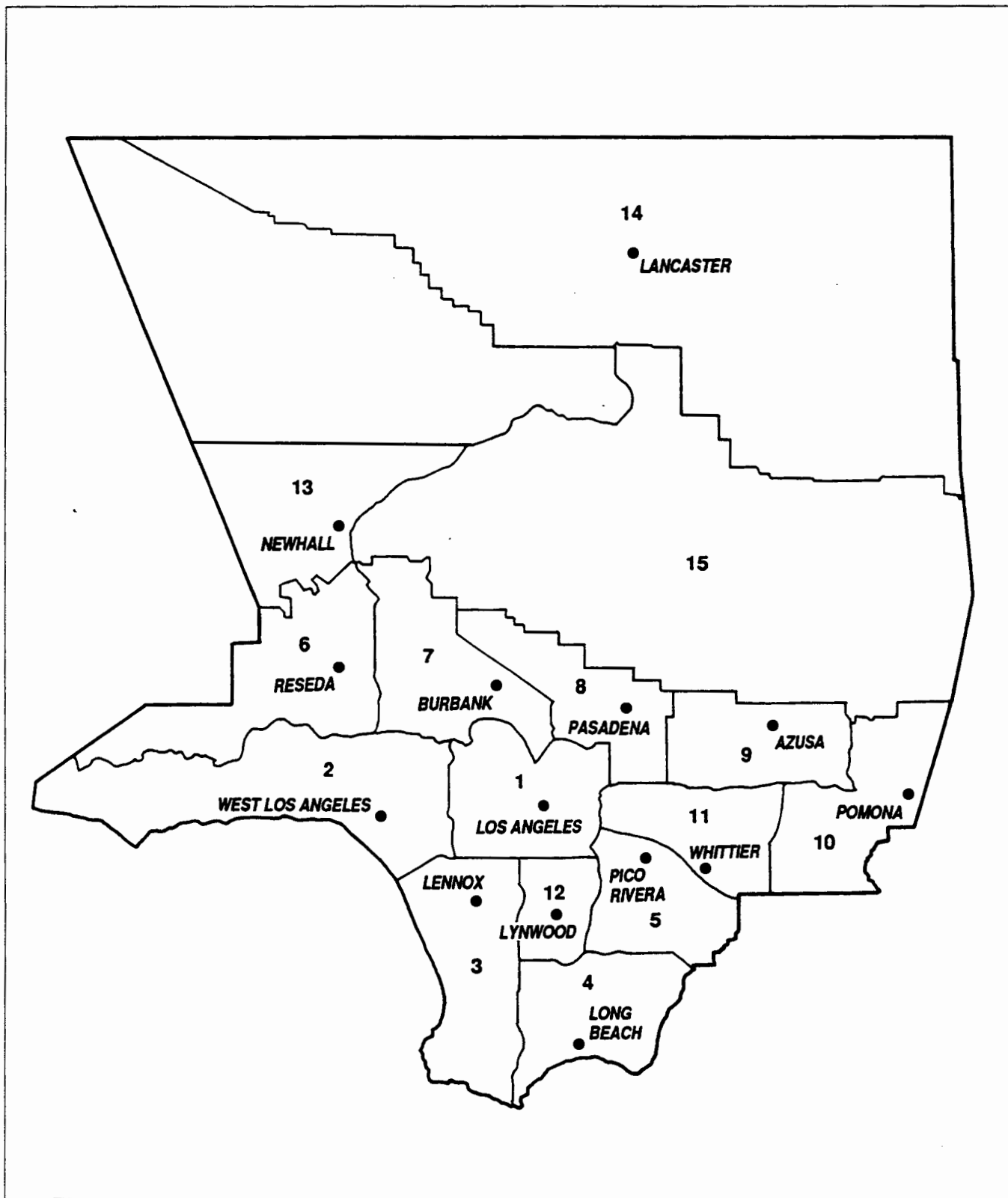
TABLE 11: SOUTH COAST AIR BASIN AIR QUALITY RECEPTOR AREAS AND MONITORING STATIONS

Station Numbers	Air Monitoring Areas	Air Monitoring Stations
1	Central Los Angeles	Los Angeles
2	Northwest Coastal	W. Los Angeles
3	Southwest Coastal	Hawthorn
4	South Coastal	Long Beach
5	Southeast Los Angeles County	Pico Rivera
6	West San Fernando Valley	Reseda
7	East San Fernando Valley	Burbank
8	West San Gabriel Valley	Pasadena
9	East San Gabriel Valley	Azusa
10	Pomona/Walnut Valley	Pomona
11	South San Gabriel Valley	Whittier
12	South Central Los Angeles	Lynwood
13	Santa Clarita Valley	Santa Clarita
14	Antelope Valley	Lancaster
15	San Gabriel Mountains	15 A - San Fernando/Santa Clarita Valleys 15 B - San Gabriel/Pomona Valleys

showed a decline in number of days Federal (9.5 ppm) and State (9.1 ppm) standard were exceeded over this period.

In the South Central Los Angeles area concentrations increased from 1987 to 1989 and then declined in years 1990 and 1991. The rest of the County remained relatively stable.

Ozone - Ozone is formed through chemical reactions of reactive organic gases, oxides of nitrogen and the oxygen in air in the presence of sunlight. It is a colorless, sharp odor gas. Because the ozone-forming reactions require sunlight, peak concentrations tend to occur in the summer and near the middle of the day, when the sunlight is most intense. The sea wind typically carries the polluted air inland as these photochemical reactions proceed. For this reason, peak ozone concentrations are found in the inland valleys some distance from the largest concentrations of sources of precursor emissions. The maximum recorded 1-hour concentration

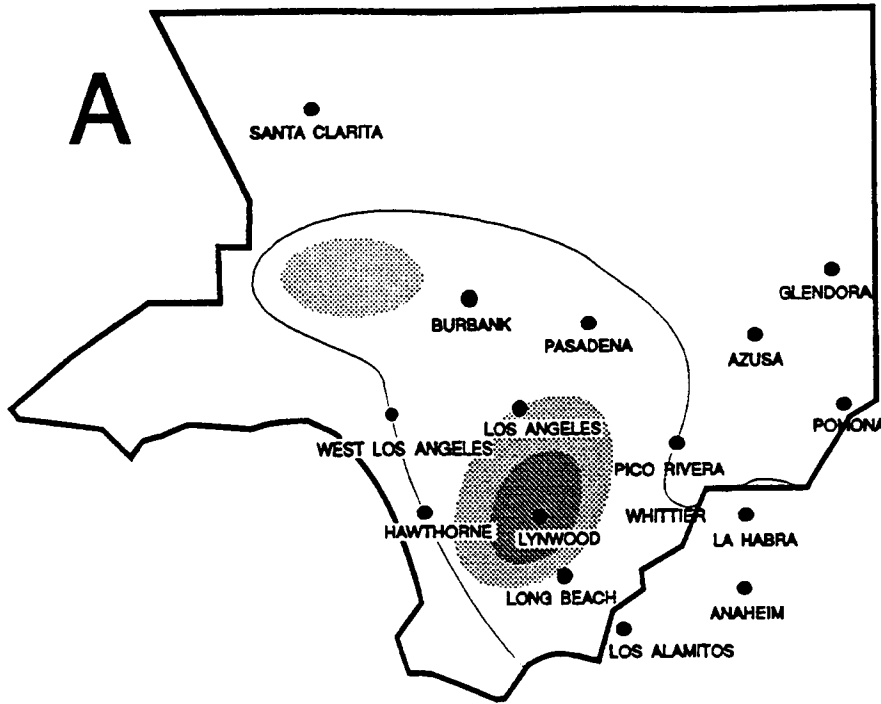


SOURCE: Terry Hayes & Associates.

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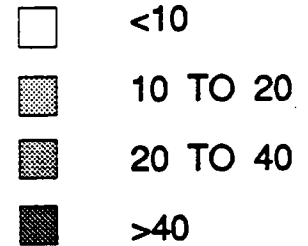
Figure 8
 Source Receptor Areas and Air Monitoring
 Stations in Los Angeles County

1990 CARBON MONOXIDE LEVELS

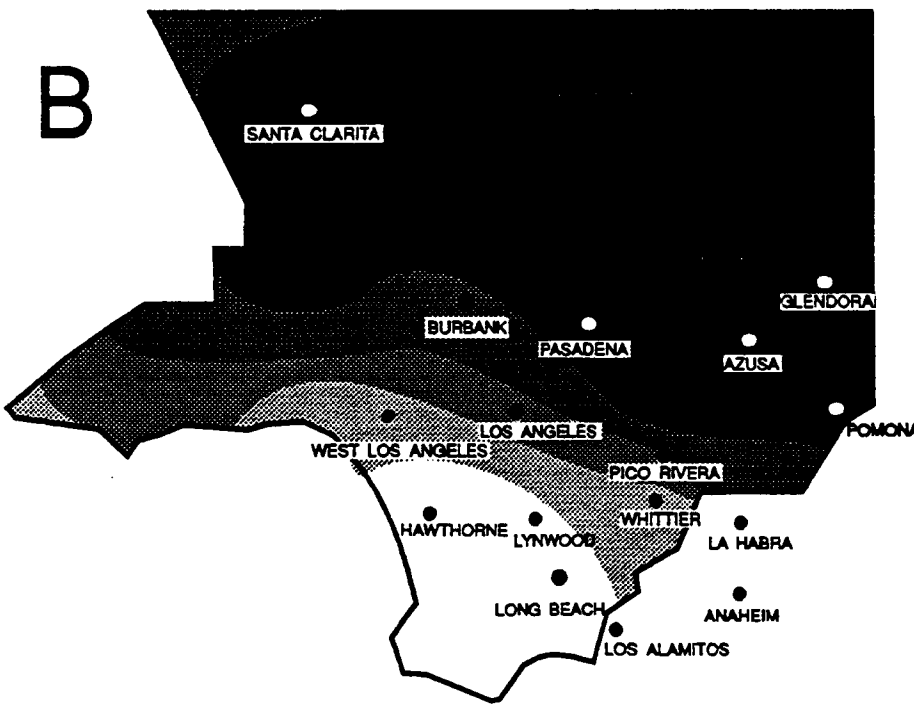


LEGEND:

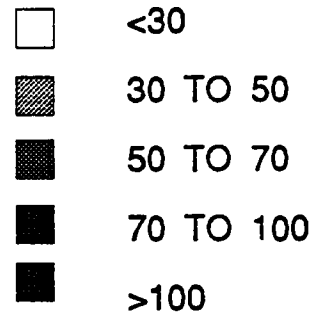
of Days State Standard was Exceeded



1990 OZONE LEVELS



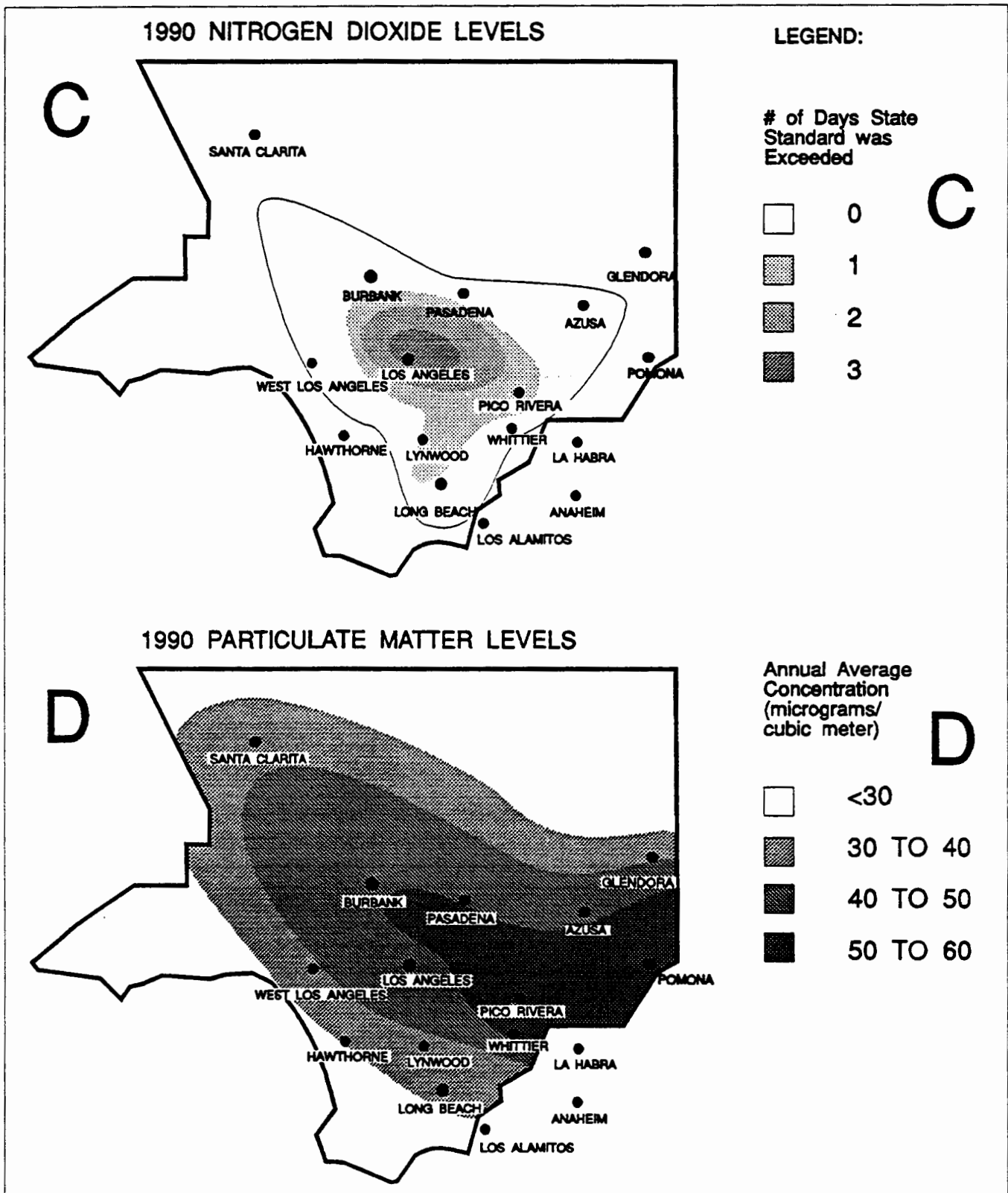
of Days State Standard was Exceeded



SOURCE: Terry Hayes & Associates.

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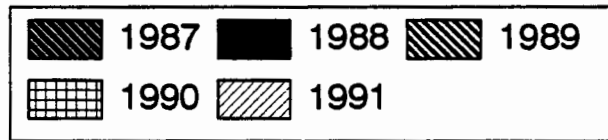
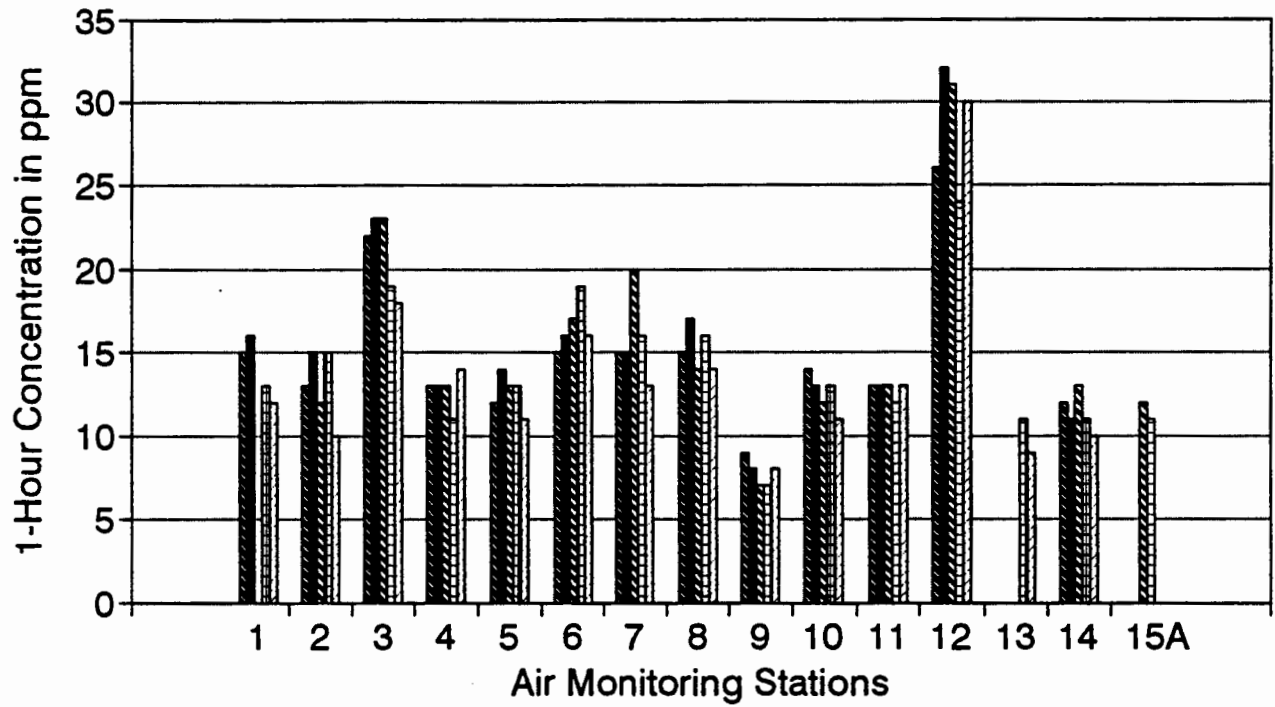
Figure 9
Carbon Monoxide and Ozone Levels
in the Project Vicinity



SOURCE: Terry Hayes & Associates.

Los Angeles County Congestion Management Program / 91578 ■

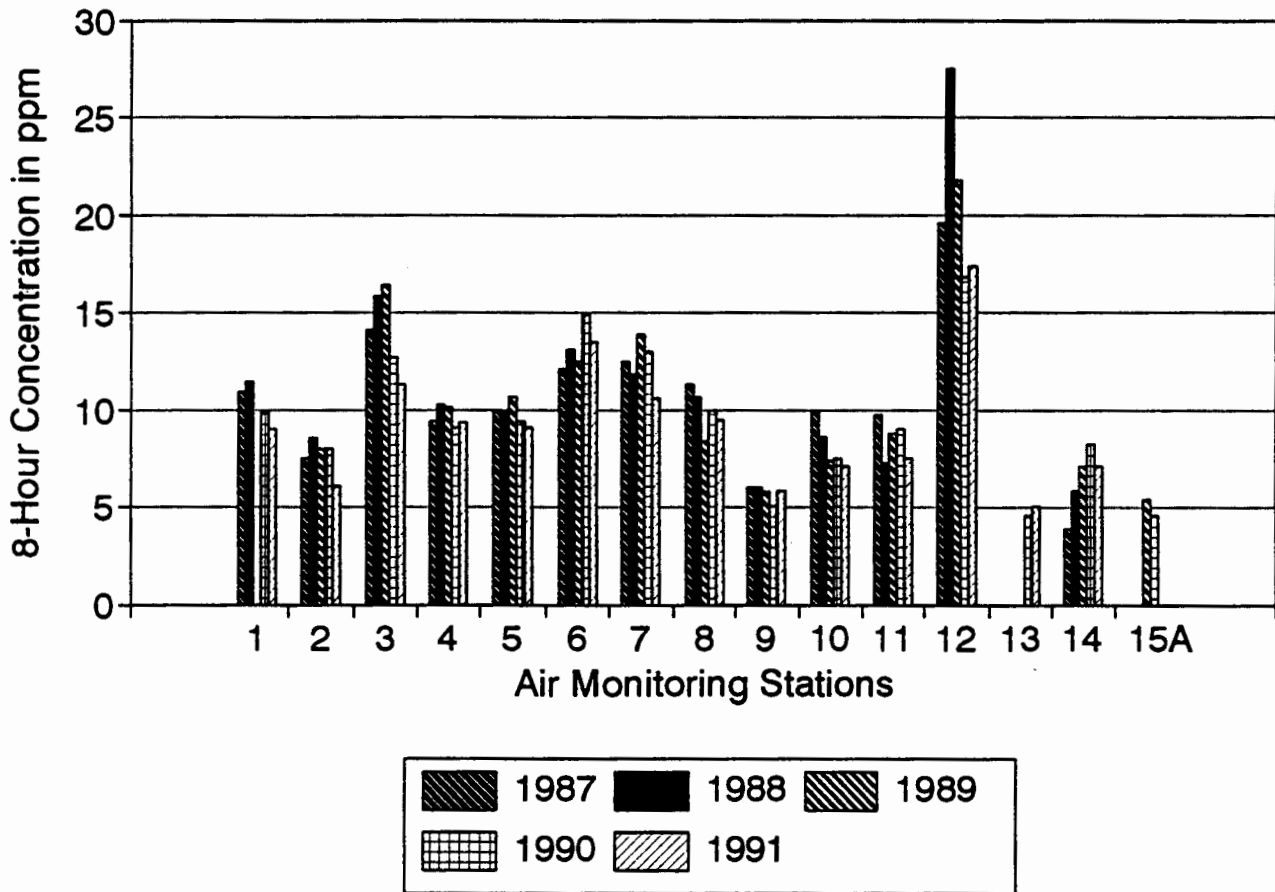
Figure 10
Nitrogen Dioxide and Particulate Matter
in the Project Vicinity



SOURCE: Terry Hayes & Associates.

Los Angeles County Congestion Management Program / 91578 ■

Figure 11
 1-Hour Carbon Monoxide Levels (ppm)
 Los Angeles County, 1987 - 1991



SOURCE: Terry Hayes & Associates.

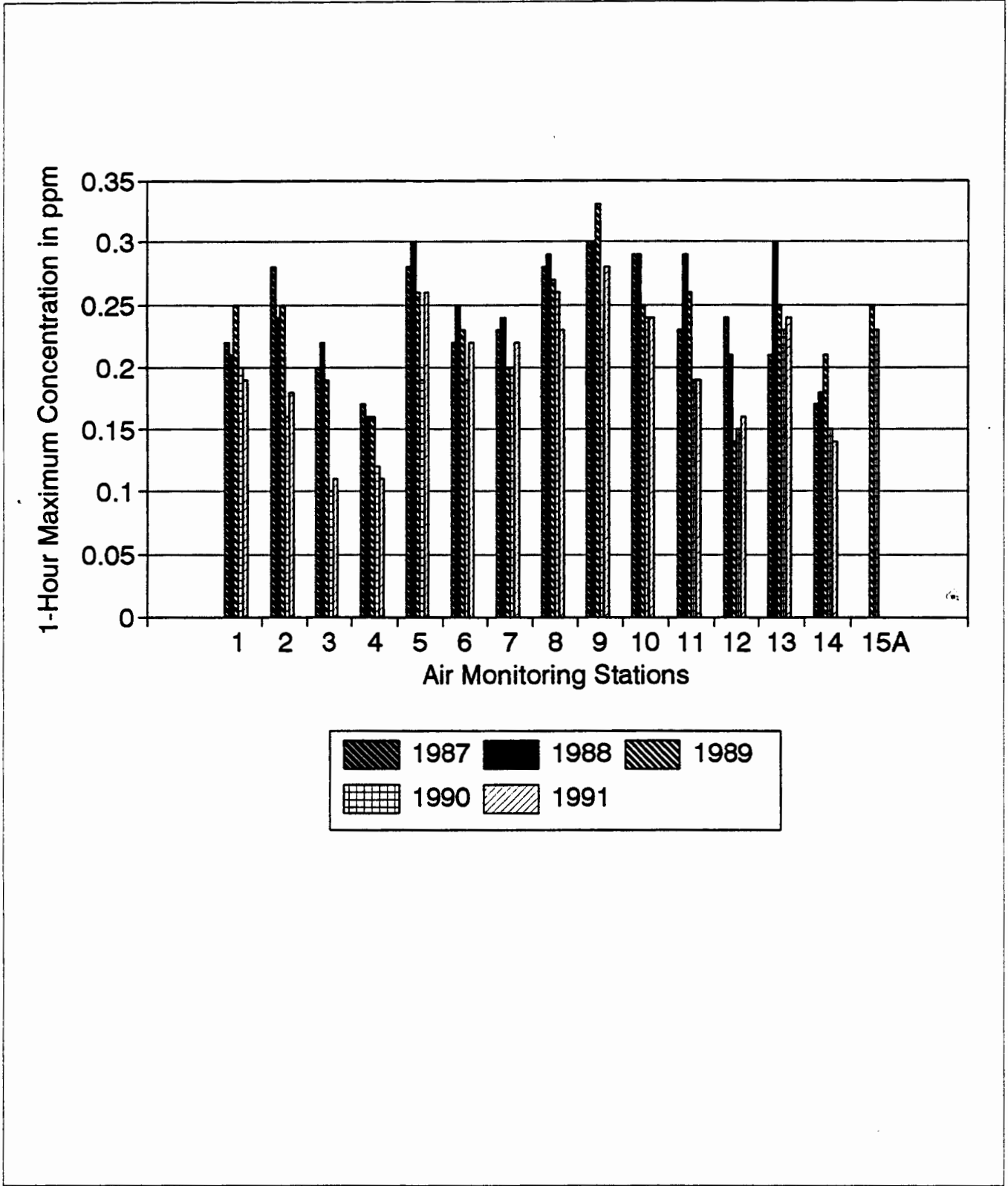
Los Angeles County Congestion Management Program / 91578 ■

Figure 12
 8-Hour Carbon Monoxide Levels (ppm)
 Los Angeles County, 1987 - 1991

was 0.33 in 1989 in East San Gabriel Valley (Azusa). Azusa recorded consistently high concentration of ozone in the County from 1987 to 1991 due to its geographical location. The concentration ranged from 10.0 ppm to 30.0 ppm in the Los Angeles County (Figure 13). The summer and near the middle of the day, when the sunlight is most intense. The sea wind typically carries the polluted air inland as these photochemical reactions proceed. For this reason, peak ozone concentrations are found in the inland valleys some distance from the largest concentrations of sources of precursor emissions. The maximum recorded 1-hour concentration was 0.33 in 1989 in East San Gabriel Valley (Azusa). Azusa recorded consistently high concentration of ozone in the County from 1987 to 1991 due to its geographical location. The concentration ranged from 10.0 ppm to 30.0 ppm in the Los Angeles County (Figure 13). The general trend indicates a decline in the ozone concentration in the County. The state standard exceeded ranged from 3 (Hawthorne, 1990) to 175 (Pasadena, 1988) between 1987 and 1991.

Suspended Particulate (PM₁₀) - Atmospheric particulates consist of finely divided solids or liquids such as soot, dust, aerosols, fumes and mists. Particulate smaller than 10 microns are known as PM₁₀ and are regulated as a criteria air pollutant. Standards for PM₁₀ were adopted by the Air Resources Board (ARB) in 1983 and by the EPA in 1987 to replace the earlier standards for total suspended particulate or TSP, which includes larger particles. In 1989, PM₁₀ averaged for 42 percent to 63 percent of TSP, depending on location. In areas close to major sources, particulate concentrations are generally higher in the winter, when more fuel is burned, and meteorological conditions favor the build-up of directly-emitted contaminants. Natural activities, such as wind and ocean spray, also put particulates into the atmosphere. In Los Angeles County the maximum PM₁₀ was recorded in the Antelope Valley area (Lancaster) in 1990, 342 ug/m³. The PM₁₀ concentration almost doubled in 1991 to 780 ug/m³ from 342 ug/m³ in 1989 in Lancaster (Figure 14). The Central Los Angeles area (Los Angeles) indicated a gradual increase in PM₁₀ concentration. Other areas showed a decline in the concentration.

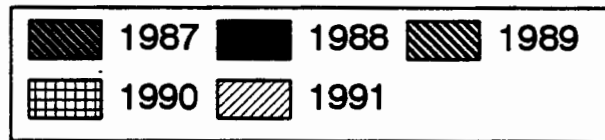
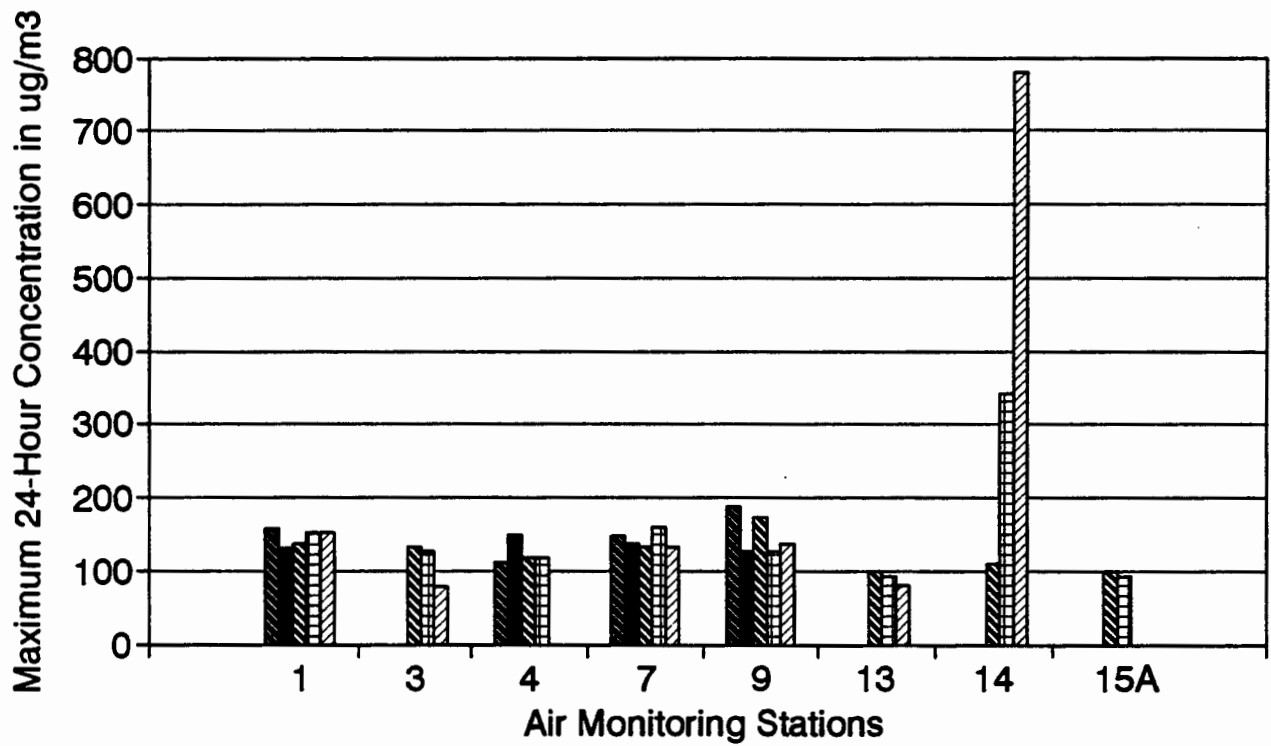
Nitrogen Dioxide (NO_x) - Nitrogen Dioxide is a brownish reactive gas with a bleach like odor formed by oxidation of colorless nitric oxide (NO). The major source of this pollutant in SCAB region is vehicle engines, power plants, and other industrial operations. The emitted compound, nitric oxide combines with oxygen in the atmosphere in the presence of hydrocarbons and sunlight to form nitrogen dioxide and ozone. Nitrogen dioxide, the most significant of these pollutants can color the atmosphere at concentrations as low as 0.5 ppm on days with 10-mile visibility. The maximum concentration recorded was 0.54 ppm in the Central Los Angeles area (Los Angeles) in 1988. During the most recent 5 years, the concentration ranged from 0.08 ppm



SOURCE: Terry Hayes & Associates.

Los Angeles County Congestion Management Program / 91578 ■

Figure 13
 1-Hour Maximum Ozone Concentration
 Los Angeles County, 1987 - 1991



SOURCE: Terry Hayes & Associates.

Los Angeles County Congestion Management Program / 91578 ■

Figure 14
 Maximum 24-Hr. PM10 Concentration
 Los Angeles County, 1987 - 1991

III. Environmental Setting, Impacts and Mitigations

to 0.54 ppm (Figure 15). In 1991 the maximum concentration was recorded in Los Angeles: 0.38 ppm. Like other pollutants Nitrogen Dioxide indicates a general inconsistent decline in concentration with the Central Los Angeles area reporting consistently high in the County with exception of year 1989. In 1989, two of the 15 sources receptor areas recorded highest concentration in the county, West San Gabriel Valley (Pasadena, 0.34 ppm) and South Central Los Angeles (Lynwood, 0.34 ppm). During the last five years, the state standard was exceeded from 0-6 days in the County, with Los Angeles exceeding the standard for 6 days in 1988.

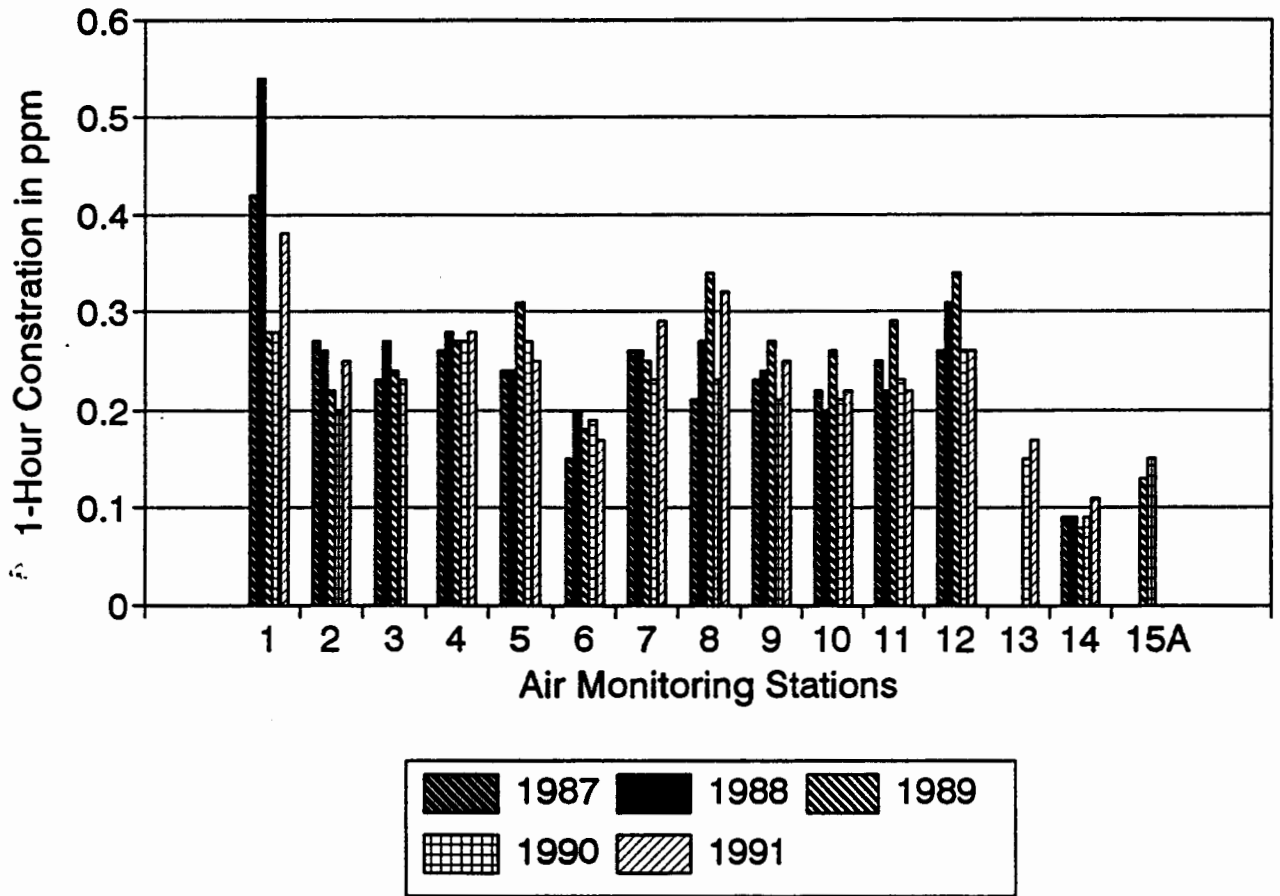
Sulfur Dioxide (SO₂) - Sulfur dioxide is a colorless, pungent, irritating gas formed primarily by the combustion of sulfur-containing fossil fuels. Conditions of high relative humidity, photochemical activity, and limited vertical mixing favor the oxidation of the sulfur dioxide which may be converted to sulfur trioxide (SO₃) and sulfuric acid mist, with some of the latter eventually reacting with other materials to produce sulfate particulate. Sulfur dioxide levels are generally higher in the winter. During the last five years (1987-1991), sulfur dioxide concentration ranged from 0.01 ppm to 0.15 ppm in Los Angeles County (Figure 16). The maximum concentration was recorded in the Southwest Coastal area (Hawthorne) in 1988, 0.15 ppm. In 1991 the maximum concentration was recorded in the South Coastal area (Long Beach): 0.14 ppm.

Air Quality Emissions

Another major indicator of air quality conditions in Los Angeles County is the inventory of daily emissions of various pollutants from both stationary and mobile sources. Table 12 illustrates the basic relationship between Los Angeles County and the entire SCAB. As can be seen from the data, Los Angeles County generally represents over 60 percent of the emissions of pollutants generated in the SCAB.

Geographic Distribution

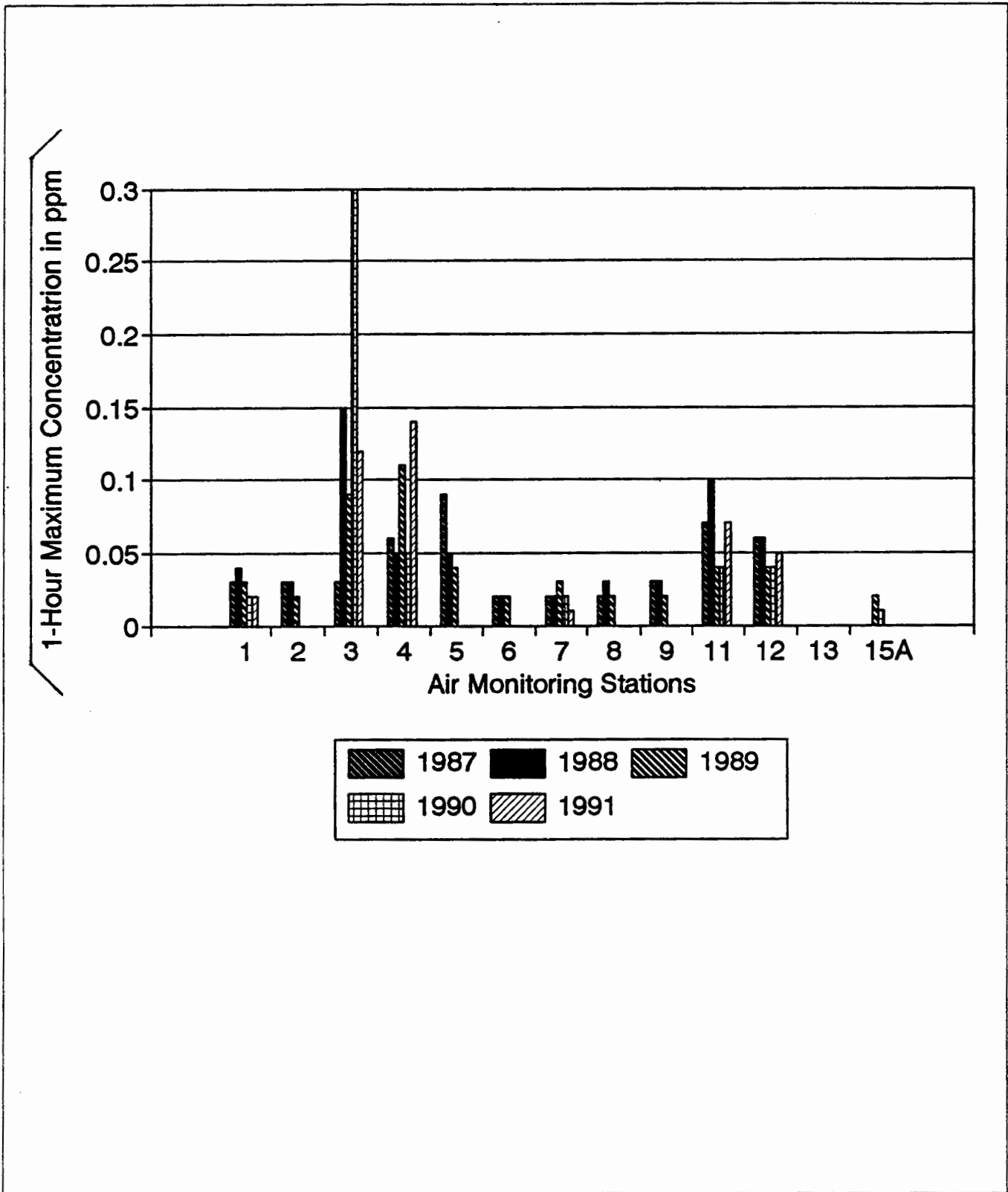
The geographic distribution of daily emissions of various subareas within the County is characterized below:



SOURCE: Terry Hayes & Associates.

Los Angeles County Congestion Management Program / 91578 ■

Figure 15
1-Hour Nitrogen Dioxide Concentration
Los Angeles County, 1987 - 1991



SOURCE: Terry Hayes & Associates.

Los Angeles County Congestion Management Program / 91578 ■

Figure 16
1-Hour Sulfur Dioxide Concentration
Los Angeles County, 1987 - 1991

TABLE 12: COMPARISON OF SCAB AND L.A. COUNTY ON-ROAD MOBILE EMISSIONS BY MAJOR SOURCE CATEGORIES (In Tons/Day)

GEOGRAPHIC AREA	TOG	ROG	CO	NOX	SOX	PM	PM10
SCAB	652.79	604.55	4,363.25	664.16	31.61	88.72	53.24
L.A. CO.	428.80	397.16	2,848.08	415.56	19.78	55.25	32.66
LA County. % of SCAB	66%	66%	65%	63%	63%	62%	61%

SOURCE: AQMP 1991 Revision, TOG = Total Organic Gases

Coastal Area - The coastal area of Los Angeles County runs along the coast between Ventura County on the northwest, Orange County on the southeast and the Santa Monica Mountains and the Long Beach area to the north. Reactive Organic Gas (ROG) levels range from >0 to 0.5 tons per day along the northwest portion of the coastal area to over 3.0 tons per day in the southeast and interior portions of the Coastal area. NOX levels range from >0 to 0.1 tons per day in the northwest to over 3.0 tons per day southeast of Santa Monica. CO levels range from >0 to 5 tons per day along the northwest portion of the coastal area, from 5 to 15 tons per day north of the Palos Verdes Peninsula, and over 50 tons per day in the Santa Monica/West Los Angeles area. SOX levels range from >0 to 0.01 tons per day in the northwest and from 0.05 to 0.5 tons per day along the southeast of the coastal area. TSP levels range from >0 to 0.25 tons per day in the northwest and southern portions of the coastal area while TSP levels in the central coastal areas range from 0.25 to 1.0 tons per day.

Metropolitan Area - The metropolitan area of Los Angeles County includes the downtown area and the area southeast of downtown. ROG levels in the metropolitan area range from over 3.0 tons per day in the downtown area to between 1.5 and 3 tons per day southeast of downtown. NOX levels decrease from over 3.0 tons per day in the downtown area to between 1.5 and 3.0 tons per day southeast of downtown. CO levels decrease from over 50 tons per day in the downtown area to between 15 and 30 tons per day southeast of downtown. SOX levels are fairly consistent throughout the metropolitan area (0.15 to 0.5 tons per day), and TSP levels range from

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0.25 to 1.5 tons per day in the downtown area to between >0 to 0.25 tons per day southeast of downtown.

San Fernando and Santa Clarita Valleys - The air quality in the San Fernando Valley and Santa Clarita Valley are impacted to varying degrees by automobile emissions. TSP levels range from 1.5 to 3.0 tons per day in the San Fernando basin, adjacent to the Santa Monica Mountains, to between >0 and 0.5 tons per day in the Santa Clarita Valley. NOX levels in the San Fernando Valley range from 1.5 to over 3.0 tons per day while NOX levels in the Santa Clarita Valley range from >0 to 0.5 tons per day. Increased NOX levels ranging from 0.1 to 1.5 tons per day occur in the Santa Clarita Valley along Interstate 5. CO levels in the San Fernando Valley are over 50 tons per day while CO levels in the Santa Clarita Valley are between 0 to 5 tons per day. SOX levels range from 0.05 to 0.5 tons per day in the San Fernando Valley to between 0.1 and 0.05 tons per day in the Santa Clarita Valley. ~~TSP levels range from 0.25 to 1.0 tons per day in the San Fernando Valley to between >0 and 0.25 tons per day in the Santa Clarita Valley.~~ Amended - See ERRATA Notes

San Gabriel and Pomona Valleys - The San Gabriel/Pomona Valleys contain a range of air quality levels. ROG levels range from 1.5 to over 3.0 tons per day within the foothill communities to between >0 and 0.1 tons per day north of the San Gabriel Mountains. NOX levels range from 1.5 to over 3 tons per day in the foothill communities to between >0 and 0.1 tons per day north of the San Gabriel Mountains. CO levels for the most part range from 15 to 30 tons per day in the San Gabriel/Pomona Valleys while the Pasadena area ranges from 30 to 50 tons per day. SOX levels range from 0.15 to 0.5 tons per day along the foothill communities east of the metropolitan area to >0 to 0.2 tons per day north of the San Gabriel Mountains and 0.05 to 0.15 tons per day in the Pasadena area. TSP levels range from 0.25 to 0.5 tons per day in the foothill communities to >0 to 0.25 tons per day north of the San Gabriel Mountains.

High Desert - The high desert contains the most uniform air quality levels; the exceptions being the Palmdale and Lancaster areas. ROG levels range between >0 and 0.1 tons per day for the majority of the high desert and between 0.1 to 0.5 tons per day for the Palmdale/Lancaster areas. NOX levels range between >0 and 0.1 tons per day for the majority of the area with the Palmdale/Lancaster areas ranging between 0.1 and 0.5 tons per day. Increased NOX levels ranging from 0.5 to 1.5 tons per day occur in the high desert along State Highway 14. CO levels for the majority of the area range between >0 and 5 tons per day with Palmdale/Lancaster ranging between 5 and 15 tons per day. Likewise, SOX levels range from >0 to 0.01 tons per

day for the majority of the high desert to between 0.01 and 0.15 for the Palmdale/Lancaster area. TSP levels for the high desert are uniform, ranging between >0 and 0.25 tons per day.

IMPACTS

Direct Impacts: The CMP will contribute to a decrease in on-road emissions by maintaining established levels of roadway and transit service so as to minimize delays and congestion as described below. In this context, the overall countywide effect of the CMP would be a beneficial effect and a contribution to the attainment of the objectives of the AQMP.

Under the provisions of State legislation, before a transportation-related project can be authorized and funded, it must be determined that the project conforms to the applicable Air Quality Management Plan. The AQMP for the South Coast Air Basin is designed to achieve the objectives of both the Federal and State Clean Air acts by specified target dates.

In Los Angeles County, this means that a project must be found in conformance with the South Coast Air Basin AQMP. The air pollutant emissions levels inventoried and forecasted in the AQMP are based on land use, population and employment assumptions contained within GMP. In turn, the transportation infrastructure improvements necessary to serve the mobility needs forecasted in the GMP are defined in the RMP. As a practical matter, if a project is consistent with the RMP it is consistent with the AQMP. (These regional plans are discussed in Section III.A.) SCAG through its Executive Committee makes this determination regarding conformity with the AQMP. In the case of CMP CIP projects contained within the proposed CMP, the SCAG Executive Committee has already acknowledged the consistency of Flexible Congestion Relief (FCR) projects with the RMP.

The other elements of the CMP not addressed in conformity findings are consistent with the AQMP. Table 13 below shows the relationship between the CMP and the Transportation, Land Use and Energy Control Measures (TCMs) contained within 1991 AQMP. As shown in the Table, each of the CMP elements matches with a corresponding AQMP TCM. Specifically, CMP elements are consistent with the following categories of AQMP control measures defined in the table: TCM 1, 2, 4, 5, 13 and 17. These measures are also discussed in Section III.A.

III. Environmental Setting, Impacts and Mitigations

TABLE 13: GENERAL RELATIONSHIP BETWEEN AQMP TRANSPORTATION, LAND USE AND ENERGY CONSERVATION CONTROL MEASURES AND THE CONGESTION MANAGEMENT PLAN

AQMP Control Measure Category/a/	Corresponding CMP Element or Element Category:
1. Alternative Work Schedules and Locations	TDM - Optional List
2. Mode Shift Strategies	Transit Network Definition and LOS standards CIP- Freeway System Management (HOV Lanes). CIP - Bus Improvements. CIP - Rail Improvements. CIP - Alternative Mode Improvements.
3. Truck Goods Movement	Not Applicable
4. Traffic Flow Improvements	Highway and Roadway Network Definition and LOS Standards. CIP - Freeway System Management (operational improvements, ramp meters). CIP - Arterial System Improvements
5. Non recurrent Congestion	CIP - Freeway System Management (Incident Management Systems).
6. Aircraft and Ground Service Vehicles	Not Applicable
7. Centralized Ground Power Systems	Not Applicable
8. Airport Ground Access	Not Applicable
9. Replacement of High-Emitting Aircraft	Not Applicable
10. General Aviation Vapor Recovery	Not Applicable
11. Rail Consolidation to Reduce Grade Crossings	Not Applicable
12. Paving of Unpaved Roads and Parking Lots	Not Applicable
13. Freeway and Highway Capacity Enhancements	CIP - Freeway Systems Management (lane restriping). CIP - Freeway Gap Closures
14. Railroad Electrification	Not Applicable
16. High Speed Rail	Not Applicable
17. Growth Management	Land Use Analysis Program
H-2 Trip reduction for Schools	Not Applicable
H-3 Supplemental Development Standards	Land Use Analysis Program
H-4 Special Activity Centers	Not Applicable
H-5 Enhanced Regulation XV	TDM Optional list
H-6 Truck Programs	Not Applicable
H-7 Registration Program	Not Applicable

Legend:

CIP = Capital Improvement Program

TDM = Transportation Demand Management

LOS = Level of Service

SOURCE: Southern California Association of Governments, Draft Appendix IV-E, Transportation, Land Use and Energy Conservation Control Measures, Draft Air Quality Management Plan, 1991 Revision, December 1990.

Amended - See
ERRATA Notes

Amended - See
ERRATA Notes

A finding that the CMP either conforms to and/or is consistent with the AQMP does not mean that specific initiatives and/or projects that would be funded through the CMP process would not have air quality impacts. Rather, it means that the CMP as a whole would have a beneficial effect on air quality. Potential negative impacts associated with specific projects are detailed below.

The construction and/or operation of a transportation improvement project could have the following localized negative air quality impacts adjacent to the improvement alignment or right-of-way:

- Construction of roadway and/or transit improvements would have short-term construction impacts. Earth moving activities would increase localized particulate levels. Improvements to existing roadways may also require detours and delays during construction which would cause short-term increases in emissions.
- New route locations or freeway gap closures have the potential to bring mobile emission sources closer to existing sensitive land uses as well as create new line sources of pollutant emissions in areas where such sources may not have existed before.
- Providing increased roadway capacity by widening or re-striping may move vehicle travel lanes closer to sensitive land uses adjacent to the roadway.
- Creation of park-and-ride lots has the potential to attract a significant number of vehicles to parking locations. Particularly during peak periods, localized carbon monoxide "hot spots" may be created by vehicles idling or queuing at access points to parking facilities.
- Similar to park-and-ride lots, rail transit stations and transit centers would also become attractions to vehicles either where commuter parking is provided or as a result of pick-up and drop-off activities. Station circulation may also impede vehicle flow on adjacent arterial streets and thus increase delays, idling and localized emissions.

Indirect Effects: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on air quality by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in

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detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.

CMP related improvements could have the effect of increasing vehicle miles traveled as a result of latent demand resulting in air quality effect. However, this potential is considered negligible.

MITIGATION

CIP projects funded through the CMP process would be implemented by local agencies or Caltrans. These projects would be subject to CEQA and, where determined by the analysis of potential project impacts, would impose mitigation measures addressing air quality effects during both the construction and the operation of the project. In addition to mitigation measure B.1 which is repeated below, the following mitigation measures would partially mitigate direct impacts associated with CMP CIP projects:

- B.1 The LACTC shall review EIRs for CIP projects to ensure that mitigation measures are included requiring that the Lead Agency give transit operators and affected City Departments of Transportation advanced notice of construction activities which might impact the transportation system.
- C.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the air quality impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:
- preparation in accordance with applicable guidelines (SCAQMD, CALTRANS, FHWA, EPA etc.);
 - both construction and operation phase emissions and criteria pollutant concentrations, and compare emissions and concentrations to established

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SCAQMD daily emissions thresholds, as well as to California Ambient Air Quality Standards (CAAQS);

- consistency with the Air Quality Management Plan;
- demonstration that significant air quality impacts have been mitigated in a manner consistent with the provisions of applicable State and Federal clean air legislation.

C.2 The LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(1) of the Street and Highways Code for highway landscaping and urban forestry projects designed to offset vehicular emissions of carbon dioxide associated with CIP projects.

As indicated above, the implementation of the CMP may have effects on the rate and distribution of growth (population, employment, residential and non-residential), resulting in redistributed air quality impacts. The following mitigation measure addresses this indirect impact:

C.3 The LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional goals will be proposed in consultation with local, regional, and state agencies.

C.4 The LACTC shall encourage and participate in the evaluation and reconciliation of localized adverse impacts to regional improvements. Such evaluation is intended to broaden the understanding of "hot spots" of pollutant emissions, and the tradeoffs between hot spot creation and regional emission reductions.

ADVERSE IMPACTS

On a regional level the CMP would have a beneficial impact on air quality and would help to further the AQMP. Individual CIP projects would result in both short-term construction related

air quality impacts and localized operational impacts. The potential for localized CMP CIP project specific air quality impacts to remain after implementation of the mitigations and CIP project specific mitigations developed as part of CIP project specific review can only be assessed on a project specific basis.

III.D. NOISE

SETTING

The ambient noise level in Los Angeles County, like similarly highly urbanized areas, is typically high and encompasses a wide range of stationary and mobile noise sources. Even in highly urbanized areas, such as Los Angeles County, the variation in community noise levels between daytime and nighttime is quite significant. In daytime hours noise levels can range over 90 decibels. Average daytime noise levels fall in the range of 60-70 decibels. In the nighttime hours, when there are few competing noise sources, noise levels can fall below 50 decibels.

Noise from transportation vehicles is illustrated in **Table 14**. At a distance of 50 feet, noise from individual vehicles is typically discernible when compared against ambient background noise in either the daytime or nighttime periods.

Transportation facilities (freeways, arterial, transit guideways, buses, railroads, airports etc.) have a pivotal impact on community noise levels. State law requires local governments to include a noise element in their General Plan.⁹ The purpose of the noise element is to provide both an inventory and mapping of current and projected noise levels associated with major noise generators such as roadways, railroads, airports and industrial plants and to define a pattern of land uses that will minimize the exposure of community residents to excessive noise levels. Implementation measures and possible solutions to identified noise problems are also included in the noise element. Cities typically draw on information from SCAG and Caltrans regarding future traffic levels when developing their General Plan noise projections.

General Plan noise elements are intended to identify and respond to future noise patterns. Current federal and state laws largely prevent local governments from controlling noise sources

⁹ Section 65300 et. seq. of the Government Code

TABLE 14: NOISE CHARACTERISTICS OF VEHICLES

VEHICLE CLASS	VEHICLE TYPE	NOISE LEVEL AT 50 FEET
AUTOMOBILES	Passenger Cars	64 - 76
	Sports Cars	70 - 87
	Compacts	70 - 80
	Imported	70 - 80
TRUCKS	Light Duty	70 - 85
	Medium Duty	80 - 89
	Heavy Duty	85 - 95
BUSES	Highway	75 - 87
	City	70 - 85
	School	70 - 85
RAILROADS	Diesel Locomotives	88 - 98
	Passenger Cars	80 - 90
RAIL TRANSIT	Light Rail at 40 mph	77
	Heavy Rail at 70 mph	82

SOURCE: Wyle Laboratories, Transportation Noise and Noise from Equipment Powered by Internal Combustion Engines, US EPA, 1971. Also, Harris Miller and Hansen, Noise and Vibration Impact Assessment San Fernando Valley Rail Project, October 1989

by setting noise levels and operational procedures for major noise sources such as motor vehicles, interstate carriers and aircraft and by requiring that noise legislation passed by local authorities agree with the statutes of these higher authorities. Local jurisdictions do have authority to restrict speeds and prohibit trucks on surface streets and to control the path of noise by constructing barriers, however, the primary noise mitigation measure available to cities is that of land use control. In general, local jurisdictions, through their General Plans seek to control the distance between sensitive land uses, such as housing, and noise generators such as street and highways.

State guidelines recommend that exterior noise levels at sensitive land uses adjacent to transportation routes not exceed 65 decibels. As shown in Table 15, noise levels adjacent to major roadways typically range from 65 to 79 decibels. Thus, state noise guidelines for residential uses are often exceeded for residential and public facilities land uses in proximity to major transportation facilities.

IMPACTS

The potential for adverse impacts from the CMP derives primarily from the construction and operation of CIP projects. These potential impacts are discussed below.

Direct Effects of Capital Improvement Projects

Construction Noise: Noise from the construction of CIP projects may be disruptive. Often the work involves the use of heavy earth moving machinery and or pile-driving equipment. Under these circumstances noise levels during construction are likely to be significantly higher (greater than 5 decibels) than ambient conditions. Typical noise levels associated with a public works -- roadway construction type project are shown in Table 16. Noise levels at a distance of 50 feet range from 84 to 89 decibels. Although nighttime construction is conducted to avoid daytime traffic delays, noise levels from activities during what is typically a sensitive time period would be more pronounced and disruptive for any adjacent sensitive land uses such as residences, hospital, resthome, etc.

Facilities Operations Noise: The potential for noise impacts on existing elements of the CMP roadway network is anticipated to be limited. The largest single factor involved in noise impacts is increasing the speed and volume of traffic. As a general rule, assuming the traffic vehicle mix remains unchanged, the traffic volume must double to realize at least a 3 decibel increase in noise. A 3 decibel increase is generally considered the increment in noise levels that is discernible. All in all the potential for doubling traffic volumes or significantly increasing speed on existing elements of the CMP network is unlikely and as a result noise impacts resulting from CMP-related project would be minimal.

Changes in speed would also affect noise levels. It is unlikely however that incremental changes in speed resulting from CIP projects or TDM measures would exceed 5 mph since the aim of

TABLE 15: TYPICAL SURFACE TRANSPORTATION FACILITY NOISE LEVELS

AVERAGE DAILY TRAFFIC	TYPICAL EXTERIOR NOISE LEVEL (CNEL in decibels)
10,000 (Arterial)	65 dBA at 50 feet from centerline
20,000 (Arterial)	68 " " " " " "
40,000 (Arterial)	71 " " " " " "
80,000 (Freeway)	72 dBA at 200 feet from centerline
160,000 (Freeway)	76 " " " " " "
320,000 (Freeway)	79 " " " " " "

SOURCE: Based on results of Federal Highway Administration, Highway Traffic Prediction Model, RD-77-108, 1977 for at grade conditions and infinite roadway length.

**TABLE 16: TYPICAL RANGES OF NOISE LEVELS AT PUBLIC WORKS
CONSTRUCTION SITES WITH A 70 DECIBEL AMBIENT TYPICAL OF
URBAN AREAS**

Construction Activity	Noise Level in Decibels
Ground Clearing	84
Excavation	89
Foundations	88
Erection	79
Finishing	84

Bolt, Bernanek and Newman, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, US. EPA, 1971

CMP is to maintain mobility. As shown in Table 17, 5 mph increase in speed results generally in a 1-2 decibel increase in noise. This level of change would not typically be discernible to the human ear with normal sensitivity.

III. Environmental Setting, Impacts and Mitigations

**TABLE 17: GENERAL EFFECT OF SPEED CHANGE ON NOISE LEVELS
(ARTERIAL WITH AVERAGE DAILY TRAFFIC OF 20,000)**

SPEED	NOISE LEVEL AT 50 FEET FROM CENTERLINE (Decibels)
20	62
25	64
30	66
35	68
40	69
45	71

SOURCE: Based on results of the Federal Highway Administration, Highway Traffic Noise Prediction Model, RD-77-108, 1977.

Increases or decreases in truck percentages would also have an effect on noise. However, as shown in **Table 18**, the change in the percentage of trucks either added or eliminated from a particular roadway must be 10 percent or more to result in a discernible noise change.

It should be noted, however, that there are other circumstances where noise conditions may increase and adverse impacts may result including the following:

- Construction of new routes or freeway gap closures through sensitive residential areas.
- Widening of facilities on the existing CMP highway network that would bring travel lanes and mobile noise sources closer to sensitive adjacent land use receptors.
- Construction of elevated HOV lanes or elevated rail transit within or adjacent to facilities passing through residential areas or adjacent to sensitive land uses.
- Operational improvements on the CMP network that would increase traffic speed and flow that may incrementally increase noise levels.
- Increase in the frequency of transit service (bus and/or rail) would increase Community Noise Equivalent Levels (CNEL).

TABLE 18: GENERAL EFFECT OF HEAVY TRUCK PERCENTAGE CHANGE ON NOISE LEVELS (ARTERIAL WITH PEAK HOUR TRAFFIC OF 1,000)

PERCENT HEAVY TRUCKS	NOISE LEVEL AT 50 FEET FROM CENTERLINE (Decibels)
5%	69
10%	71
15%	73
20%	74
25%	75
30%	76

SOURCE: Based on results of the Federal Highway Administration, Highway Traffic Noise Prediction Model, RD-77-108, 1977.

- New transit alignments or the construction of new elevated transit facilities would increase ambient noise levels.
- New transit stations may cause an increase in mobile and stationary levels for adjacent land uses.
- New park-and-ride locations may cause an increase in mobile noise levels for adjacent land uses as a result of a significant increase in vehicle trips to the area. Stationary noise levels may also increase as a result of the construction of parking structures with ventilation systems or from parking areas where sounds such as engine run-ups, door slams, car alarms etc. would be more common.

Indirect Effects: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on noise by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.

Also a possibility is that CMP-related improvements could increase the density of trips and traffic in center areas such as near transportation centers, rail transit stations, park-and-ride lots, etc. In these cases, the noise effect of the CMP could concentrate an increase in both mobile and stationary noise levels in the immediate vicinity of these new facilities.

MITIGATION MEASURES

CIP projects funded through the CMP process would be implemented by local agencies. These projects would be subject to CEQA and, where determined by the analysis of potential project impacts, would impose mitigation measures addressing noise effects during both the construction and operation of the project. The following mitigation measure would partially mitigate direct impacts associated with CMP CIP projects:

- D. 1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the noise impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:
- are prepared in accordance with applicable local and State guidelines (FHWA FHMP 773, State Office of Noise Control, local noise ordinance and general noise element, etc.)
 - address both construction and operation phase noise, particularly at sensitive land uses adjacent to the project. Noise levels shall be compared to applicable guidelines and standards.
 - demonstrate that all significant noise impacts have been mitigated in a manner consistent with the provisions of applicable local ordinances, as well as State and Federal guidelines.

III. Environmental Setting, Impacts and Mitigations

As indicated above, the implementation of the CMP may have effects on the rate and distribution of growth (population, employment, residential and non-residential), resulting in redistributed noise impacts. The following mitigation measure included in Section III.C and repeated below addresses this indirect impact:

C.3 The LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional goals will be proposed in consultation with local, regional, and state agencies.

ADVERSE IMPACTS

On a regional level the CMP would not have an adverse impact on noise. Individual CIP projects would result in both short-term construction related noise impacts and potentially localized operational noise impacts. The potential for localized CMP CIP project specific noise impacts to remain significant after implementation of the mitigations and CIP project specific mitigations developed as part of CIP specific review can only be assessed on a project specific basis.

III.E. GEOLOGY

SETTING

Amended - See
ERRATA Notes

The County of Los Angeles comprises a large section of Southern California. The County includes the Los Angeles Basin, the Coastal Region, San Fernando/Santa Clarita Valleys (Transverse Ranges), San Gabriel/Pomona Valleys (San Gabriel Mountains), and the High Desert (Antelope Valley). The Coastal areas include Santa Monica, Marina, Santa Monica Mountains, Palos Verdes Hills, Pacific Palisades, and Los Angeles Harbor.

III. Environmental Setting, Impacts and Mitigations

The County is characterized by broad, flat areas of intensely urbanized valleys and coastal plains that are separated by relatively undeveloped mountain areas. The lowland areas such as Downtown Los Angeles, South Central Los Angeles, and valley areas comprise a major portion of the Los Angeles basin geomorphic province. High mountains and valleys represent the dominant east-west trend of the Transverse Ranges province. The Los Angeles Basin is bounded on the west by the Santa Monica Mountains, Simi Hills and the Santa Susana Mountains and to the north by the San Gabriel Mountains, each of which is part of the Transverse Ranges. The Santa Ana Mountains, the San Joaquin and Puente Hills form the eastern topographic boundary of Los Angeles and the Pacific Ocean and the Palos Verdes Hills form the southern boundary.

Los Angeles County is bordered by Ventura County to the west, San Bernardino County to the east, Kern County to the north, and the Pacific Ocean and Orange County to the south.

The geology and present landscape of Los Angeles has been attributed to a geological process which has taken place over millions of years. The mechanical model used to discuss the process -- plate tectonics -- attributes the formation of the area to a shift between the evolutionary shift of the tectonic boundary between the Pacific and North American plates. The point of interaction of these two plates is what we commonly refer to today as the San Andreas Fault System.

The northwest-trending strike-slip faulting associated with this boundary in addition to the east-west trending Transverse Ranges have contributed to the development of the physical and geologic "subprovinces" which represent Los Angeles County.

Geology

Much of the land in Los Angeles County -- valley and mountain alike -- is comprised of marine sediments from the area's ancient past as seafloor. Rock types in the region range from ancient, crystalline basement rocks; old, primarily marine, sedimentary rocks; and recent alluvial deposits.

Geologic Hazards

Numerous environmental problems, such as erosion, landslides, liquefaction and earthquakes are associated with the geology and soils throughout Los Angeles County.

In the high mountain areas (i.e. the Santa Monica Mountains) the terrain features high peaks and long, narrow valleys. The topography is rugged, the slopes are steep and unstable rock in much of the higher elevation contribute to slope instability. In addition, the dangers of flash flooding, landslides/mudslides, and the flow of debris in the mountains which sometimes accompany short periods of intense rainfall (i.e. the "Floods of '92").

These problems are important with respect to transportation due to potential hazards which could disrupt facility operations or constrain transportation system development.

Landslides and Erodability

Soil stability hazards which exist throughout the County include erosion and landslides/mudslides. Erodible soils are found in the following areas: the San Gabriel Mountains, the Santa Monica Mountains, the Santa Susana Mountains; and along coastal areas and the Santa Clara, San Gabriel, and Los Angeles Rivers. Active geological processes, weak earth materials and steep terrain, in addition to the effects of urbanization have resulted in widespread slope failures.

In general, Tertiary sedimentary rocks are subject to the greatest number of large landslides. Older rocks, such as those of the Transverse Ranges, are less prone to landsliding and have high erosion rates. Recent sediments on steep slopes tend to have high erosion rates and may be susceptible to landsliding. Much of the Santa Monica Mountains is geologically unstable and prone to slope failure by landsliding. Many other areas throughout Los Angeles County, such as the San Gabriel Mountains have widespread slope stability hazards. Many coastal areas, such as San Pedro and Long Beach, are becoming more susceptible to landsliding, as a result of wave erosion.

Soils

According to the U.S. Soil Conservation Service¹ there are sixteen major soil classifications mapped for Los Angeles County. Of these, most soils are classified as belonging to Groups II and III. Group II soils are either those of alluvial fans, plains, terraces and rolling hills (slopes to 15% or lowland soils) or those that typically form on coastal soil. Group III soils are upland soils which tend to form on slopes from 9 - 50%.

1 United States Department of Agriculture, Soil Conservation Service, Report and General Soils Map - Los Angeles County, June 1967, revised 1969.

The predominant soil type of the coastal zone is the Oceana Association. These soils have high sand concentrations and are susceptible to severe wind erosion where exposed. Lowland soils of the Los Angeles Basin are varied. Soil properties that present a constraint to development include high shrink-swell potential, high corrosivity, high erosion potential and load limitations. Lowland soils with moderate to high shrink-swell potential include Yolo, Chico, Pleasanton-Ojai and Ramona-Placentia Associations. Of these, all but the Yolo also have moderate to high corrosivity. Soils of the Altamont and Diablo Associations are present in the Elysian and Torrance-Wilmington faults may also be capable of generating large earthquakes.

Subsidence and Unstable Soil

Subsidence, a lowering of the ground surface, generally is the result of the extensive pumping of fluids (water or oil) from the subsurface. This condition can result in sudden or gradual ground failure and damage to and collapse of structures.

Certain areas of Los Angeles County are prone to regional down-warping and rapid subsidence. In the past large scale petroleum extraction has created subsidence in the Long Beach- Los Angeles area, but reclamation practices have greatly limited this type of ground failure.²

Subsidence related to oil resource development in the Los Angeles Basin became an issue in the 1950's and 60's. Of the 15 main oil fields in the Los Angeles Basin, the Beverly Hills/Cheviot Hills, Santa Fe Springs, Wilmington, and Inglewood Oil Fields displayed significant subsidence during that time period.³ In the Wilmington Oil Field, damage to industrial facilities, buildings, utilities, and transportation facilities, and the threat of inundation to low-lying areas in Long Beach, prompted oil companies to begin pumping large amounts of water or steam into reservoir rock to counteract the subsidence. This had the effect of repressurizing the oil reservoir and immediately began slowing subsidence rates. By the early 1960's, water injection/flooding operations are believed to have minimized subsidence in the other rapidly subsiding oil fields in the Los Angeles basin as well.

² State of California - The Resources Agency, Landslides and Subsidence -Geologic Hazards Conference, May 26 -27, 1965.

³ Wentworth, C.M., and Yerkes, R. F. , 1971, "Geologic Setting and Activity of Faults in the San Fernando Area of California", The San Fernando Earthquake of February 9, 1971: U.S. Geological Survey, Professional Paper 733, p. 6 - 16.

In Los Angeles County, the City of Long Beach and the State Division of Oil and Gas presently administer a post-oil production plan to ensure that subsidence does not resume.

Seismicity

The principal geologic hazards from earthquakes are fault rupture, tsunamis, strong ground shaking, fault rapture and soil liquefaction.

As shown in **Figure 17** Los Angeles County is located in an area with two highly active fault systems: The San Andreas system of transform faults, which includes such ruptures as the San Andreas, San Gabriel, Whittier, and the Newport-Inglewood; and a system of thrust faults associated with the Transverse Ranges featuring faults such as the Sierra Madre, San Fernando, and "blind" thrusts underlying the Los Angeles Basin.⁴

As shown in **Figure 18** the entire County of Los Angeles is seismically active with 50 active and potentially active faults or principal fault segments located within the immediate area. A minimum of 21 of these are considered major active faults. In addition, there are an unknown number of buried thrust faults and offshore faults, some of which could cause damaging earthquakes.⁵

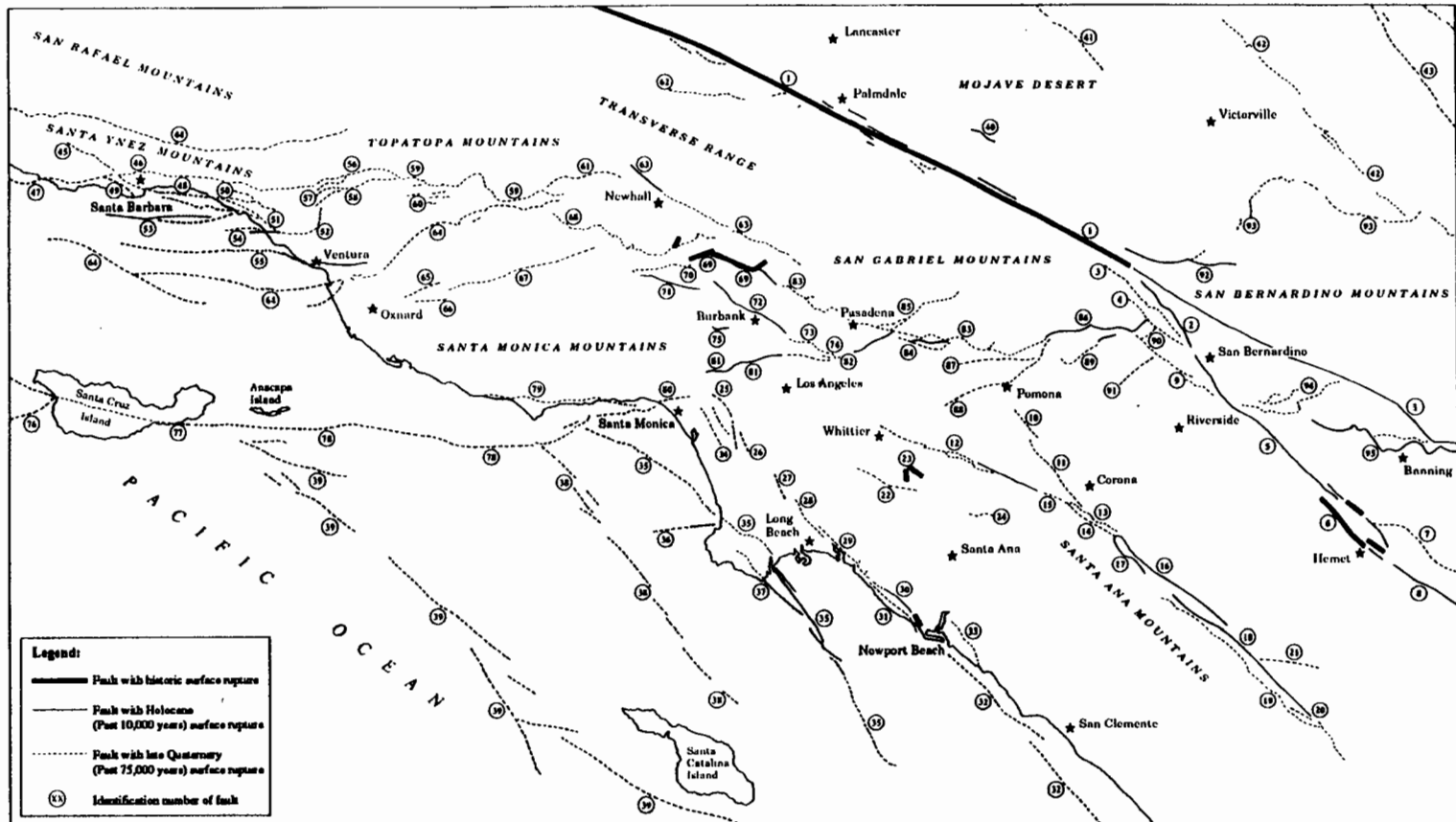
There are five major Alquist-Priolo Special Study Zone (APSSZ) faults in Los Angeles County: the San Andreas, Newport-Inglewood, San Gabriel, Raymond, and the San Fernando Valley fault **Figure 18**. These zones have been identified by special studies and zoned by the State⁶ to exclude projects within 50 feet of fault traces.

Between 1800 and 1989, active fault systems in the Los Angeles region were responsible for approximately 54 damaging earthquakes, indicating the region as a whole experiences about one earthquake every four years.

⁴ California Division of Mines and Geology, Fault Rupture Hazard Zones in California, Special Report 42, revised 1985.

⁵ California Division of Mines and Geology, Fault Rupture Hazard Zones in California, Special Report 42, revised 1985.

⁶ State of California, Alquist-Priolo Special Study Zones Act, Public Resources Code, Division 2, Chapter 7.5 - Effective March 1973.



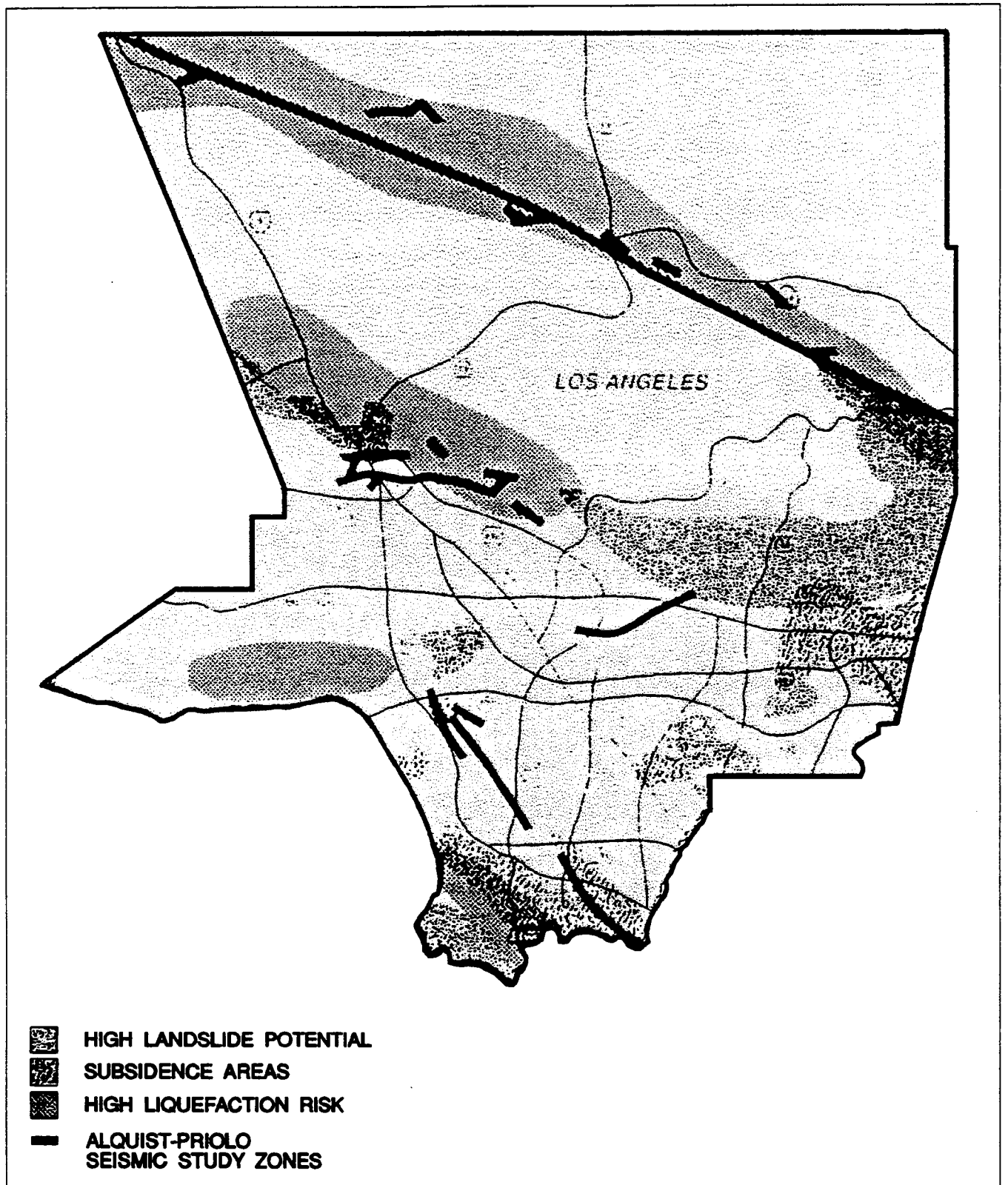
- 1 San Andreas Fault Zone
- 2 Glen Helen
- 3 San Jacinto
- 4 Lytle Creek
- 5 Claremont
- 6 Casa Loma
- 7 Hot Springs
- 8 Clark
- 9 Rialto-Colton
- 10 Central Avenue
- 11 Chino
- 12 Whittier
- 13 Main Street
- 14 Fresno-Eagle
- 15 Tin Mine
- 16 Glen Ivy North
- 17 Glen Ivy South
- 18 Wildomar
- 19 Willard
- 20 West Valley
- 21 Murietta Hot Springs
- 22 Norwalk
- 23 Faults in West Coyote Hills
- 24 Parake Hills
- 25 Inglewood
- 26 Poudre
- 27 Avalon-Campion
- 28 Cherry Hill
- 29 Reservoir Hill Seal Beach
- 30 Newport Inglewood (North Branch)
- 31 Newport Inglewood (South Branch)
- 32 Faults offshore of San Clemente
- 33 Pelican Hill
- 34 Churock and Overland Avenue
- 35 Palos Verdes Hills
- 36 Redondo Canyon
- 37 Cahuilla
- 38 San Pedro Basin fault zone
- 39 Faults of the Santa Cruz-Catalina sea-floor escarpment
- 40 Llano
- 41 Mirage Valley
- 42 Helendale
- 43 Lenwood
- 44 Santa Ynez
- 45 San Jose (A)
- 46 Mission Ridge-Arroyo Parida
- 47 More Ranch
- 48 Mesa Rincon Creek
- 49 Lavigia
- 50 Sheperd Mesa
- 51 Carpinteria
- 52 Red Mountain
- 53 Fault Y
- 54 Javon
- 55 Pitas Point Ventura
- 56 Santa Ana
- 57 Faults near Oak View
- 58 Lion Canyon
- 59 San Cayetano
- 60 Faults of Occuit and Timber Canyons
- 61 Incline
- 62 Clearwater
- 63 San Gabriel (central portion)
- 64 Oak Ridge
- 65 Springville
- 66 Camarillo
- 67 Simi
- 68 Santa Susana
- 69 San Fernando
- 70 Mission Hills
- 71 Norbridge
- 72 Verdugo
- 73 Eagle Rock
- 74 San Rafael
- 75 Possible faults in North Hollywood
- 76 Santa Rosa Island
- 77 Santa Cruz Island
- 78 Anacapa (Dante)
- 79 Malibu Coast
- 80 Santa Monica
- 81 Eagle Rock
- 82 Raymond
- 83 Sierra Madre
- 84 Duarte
- 85 Clamshell - Sawpin Zone
- 86 Cucamonga
- 87 Indian Hill
- 88 San Jose (B)
- 89 Red Hill
- 90 "Harrier J"
- 91 Inferred fault near Fontana
- 92 Cleghorn
- 93 North Frontal Fault Zone of San Bernardino Mountains
- 94 Fault of the Crafton Hills (Crafton, Chicken Hill and Casa Blanca faults)
- 95 Banning



SOURCE: *Evaluating Earthquake Hazards in the Los Angeles Region - An Earth-Science Perspective*. U.S. Geological Survey Professional Paper 1360, 1985.

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Figure 17
Faults That May Generate Damaging Earthquakes or Surface Rupture in the Los Angeles Region



SOURCE: *Draft Regional Mobility Plan, October 1988.*

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Figure 18
Geologic Hazards

Liquefaction

Liquefaction involves a sudden loss in strength of saturated soil lacking cohesion (predominantly sand) which is caused by a shock such as an earthquake. Basically, the soil temporarily behaves like fluid under these conditions. If the liquefying layer is on the surface, the effects are much like quicksand for the structures which are on it. If the layer is below the surface, it may provide a sliding surface for the material above it. Liquefaction typically occurs in areas where groundwater is less than 30 feet from the surface, and where the soils are composed predominantly of poorly consolidated sand.

There are numerous potential liquefaction areas in Los Angeles County, including those located in the Harbor area, Marina Del Rey, Walnut Valley/Whittier Narrows, southern San Fernando Valley, the flood plain of the Santa Clara River, along the San Andreas fault and low-lying areas in the Antelope Valley surrounding Rosamond Playa. Other localized high ground water conditions also make liquefaction possible where land use practices are actively recharging shallow and perched aquifers.

It is estimated that about 300,000 acres or about 11 percent of the total County area are in liquefiable areas. Approximately 100,000 acres are in County areas or about six percent of all unincorporated territory. Some 20 freeway-to-freeway interchanges are located in or near liquefiable areas.

IMPACTS

Direct Effects of Capital Improvement Projects

Modifications of existing facilities on the CMP network should not result in major adverse geotechnical impacts. However, it should be recognized that construction of highway facilities and transit guideways in new rights-of-way or previously undeveloped areas poses the potential for significant adverse geotechnical impacts. This potential is addressed below. The other elements of the CMP would not, in themselves result in geotechnical impacts.

Erosion Potential: Construction phase erosion would occur as a result of earth work for various types of CIP projects including, expanded right-of-way for intersection improvements, street widening, freeway capacity extensions, freeway gap closures, HOV lane construction, transit station construction, grading for park-and-ride lots etc. Erosion could be potentially significant for large

III. Environmental Setting, Impacts and Mitigations

scale projects that involve major new roadway construction in lightly developed, undeveloped steep terrain or terrain with significant landforms, particularly new transit alignments or freeway gap closures. It is anticipated that erosion may be a particular problem for improvements to the CMP network in the high desert areas where soil conditions and wind turbulence would combine to create adverse situations. It should also be noted that there would be a limited potential that erosion could occur on any highway and or transit project that involves artificial embankment (engineered filled).

Slope Stability: Improvements in hilly terrain or mountainous areas would be exposed to the risk of potential slope failures, landslides, mudslides and rockfalls. There would be a limited potential for slope failure to occur on any highway and or transit project that involves artificial embankments (engineered filled).

Subsidence and Soil Settlement: There would be a limited potential for subsidence or soil settlement-related impacts on improvements in coastal areas near the Port of Los Angeles. It is anticipated, however, that normal engineering practice would minimize any potential adverse effects.

Seismic Risks: Because Southern California is seismically active, all facilities on the proposed highway or transit networks could be exposed to seismic ground-shaking from the major regional faults within and adjacent to Los Angeles County. The magnitude of ground shaking could range from minor to potentially very destructive. The greatest impacts of earthquakes could be ground shaking damage to facilities with substandard construction, facilities with elevated structures and facilities that transverse fault rupture zones or Alquist-Priolo areas. As indicated in the 1988 RMP EIR, it is expected that, with new engineering design criteria for earthquake resistant structures, impacts from seismic activity on the proposed improvement projects would be less than on older, existing facilities.

Improvement projects that are close to major regional or local faults or that involve elevated structures or subways would be particularly vulnerable to seismic ground shaking and would be most likely to sustain substantial damage if design measures do not accommodate potential ground acceleration. The potential for ground rupture to affect the network is limited to those facilities that cross active fault zones, such as the San Andreas, Santa Monica/Hollywood, and the Newport Inglewood fault rupture zones.

Indirect Effects: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas in closer proximity to active faults,

which has not been anticipated in the regional plans, the CMP could have a negative effect on seismic risk. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible. Also a possibility is that CMP-related improvements could increase pressures for increased population and employment density in areas adjacent to transit stations, transit lines, transportation centers, etc. A new concentration of population and/or employment, particularly in multi-story buildings could increase human exposure to seismic event risks.

MITIGATION MEASURES

The following mitigation addresses the indirect impacts of the project:

- E.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the geological impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:
- preparation in accordance with applicable local and State guidelines (Caltrans, Division of Mines Geology, local ordinances).
 - adequate geotechnical investigations regarding grading, slope stability, seismic hazards, potential ground acceleration.
 - include the appropriate level of coordination with the State Division of Mines and Geology and identify specific mitigation measures to be implemented.
 - are designed in accordance with County and local code requirements for seismic ground shaking with special attention to the seismic design of bridges, elevated structures and tunnels.

- demonstrate that all significant geotechnical factors have been mitigated in a manner consistent with the provisions of sound engineering practice and applicable local ordinances.

As indicated above, implementation of the CMP may have effects on the rate and distribution of growth, resulting in redistributing geotechnical impacts. The following mitigation measure included in Section III.C and repeated below addresses this indirect impact:

- C.3 The LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional land use and mobility goals will be proposed in consultation with local, regional, and state agencies.

ADVERSE IMPACTS

The potential for localized CMP CIP project specific geotechnical impacts to remain after implementation of the mitigations and CIP project specific mitigations developed as part of CIP project specific review can only be assessed on a project specific basis. With mitigation, the CMP is not anticipated to result in any significant regional geotechnical impacts.

III.F. WATER RESOURCES

SETTING

Water resources are used for domestic, commercial, industrial, agricultural, recreational, and ecological activities. To the extent that the locational aspects of transportation projects can interfere with these activities, which are collectively called beneficial uses, the consideration of water resources in this environmental assessment is appropriate. The demand these activities place on natural and imported water supplies and their effect on water quality are also relevant considerations.

III. Environmental Setting, Impacts and Mitigations

Water resources are of particular concern in arid environments, such as Southern California. In an effort to preserve and enhance water quality and to protect present and future beneficial uses, the State Water Resources Control Board (SWRCB) and the nine California Regional Water Quality Control Boards (CRWQCB) formulated and adopted Water Quality Control Plans for the entire state in the early 1970's. The requirements of the Federal Water Pollution Control Act, Amendments of 1972, Public Law 92-500, Section 303-e were also incorporated into the goals and objectives of the planning program. The planning period that was used was from the year 1970 to the year 2000.

The Water Quality Control Plans encompass a total of 16 basin planning areas, which correspond to natural subsurface geohydrological formations. These 16 basins are shown in **Figure 19**. The following basins are located in Los Angeles County: the Los Angeles River Basin (Basin 4B), the upper" or eastern portion of the Santa Clara River Basin (Basin 4A), and a small section in the southern-most portion of the South Lahontan Basin (Basin 6B).

The Water Quality Control Plans (or Basin Plans) that were prepared in the early 1970's appear to be the most comprehensive, regionally-applicable source of hydrological data that is available for Los Angeles County (4B⁷, 4A⁸, 6B).⁹ Although current hydrological data is available for numerous locations throughout the County, the localized data are of differing scales and specificity.¹⁰

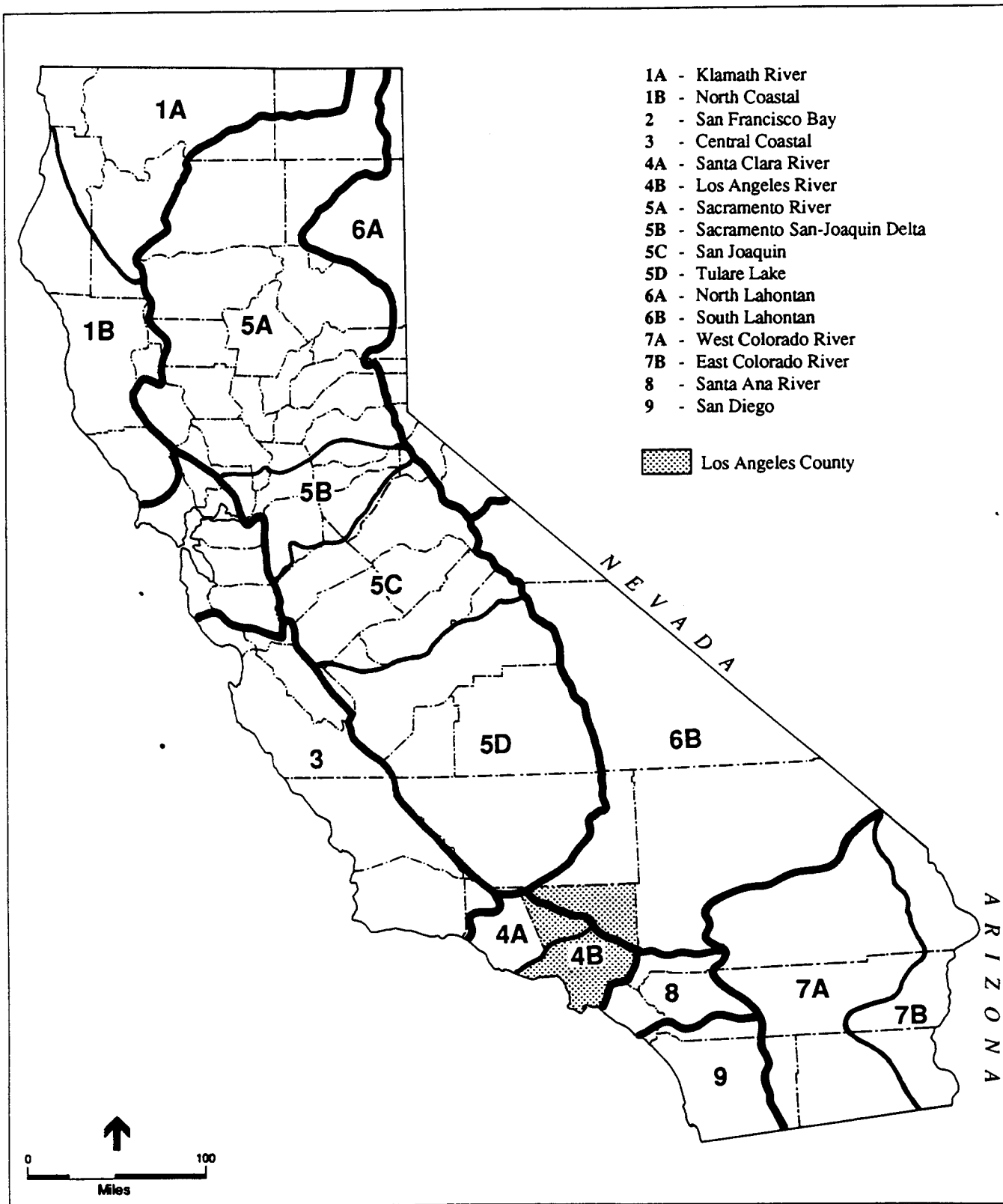
The principal water resource issues associated with implementation of the proposed CMP are beneficial uses, the supply/demand balance, and water quality. The existing characteristics of water resources in Los Angeles County are thus described below in terms of (1) the basic hydrographic (drainage) planning areas that are used in the Basin Plans, (2) the beneficial uses that occur in each

⁷ Felix Oduyemi; Southern California Association of Governments (SCAG); Personal Conversation, June 4, 1992.

⁸ Daniel, Mann, Johnson, & Mendenhall; Water Quality Control Plan, Santa Clara River Basin (4A); California Regional Water Quality control Board, Los Angeles Region (4); June, 1974.

⁹ Daniel, Mann Johnson, & Mendenhall; Water Quality Control Plan, Los Angeles River Basin (4B); California Regional Water Quality Board, Los Angeles Region (4); March, 1975.

¹⁰ Daniel, Mann, Johnson, & Mendenhall; Environmental Setting SCAG Region: South Coast Planning Area, Ventura County, Desert Areas; Southern California Association of Governments; October, 1978. (SCAG is currently in the process of updating the Environmental Setting for the SCAG Region. The scheduled completion date is approximately June, 1993.) See also Southern California Association of Governments; Environmental Impact Report, Growth Management Plan; 1988.



SOURCE: Water Quality Control Plans (4A, 4B, 6B); California Regional Water Quality Control Boards (Region 4; 6).

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Figure 19
Basin Hydrographic Planning Areas

area, (3) the County wide demand for water in comparison with local and imported supplies, and (4) the general quality of the local surface and ground water supplies, as well as the imported water.

Hydrographic Planning Areas

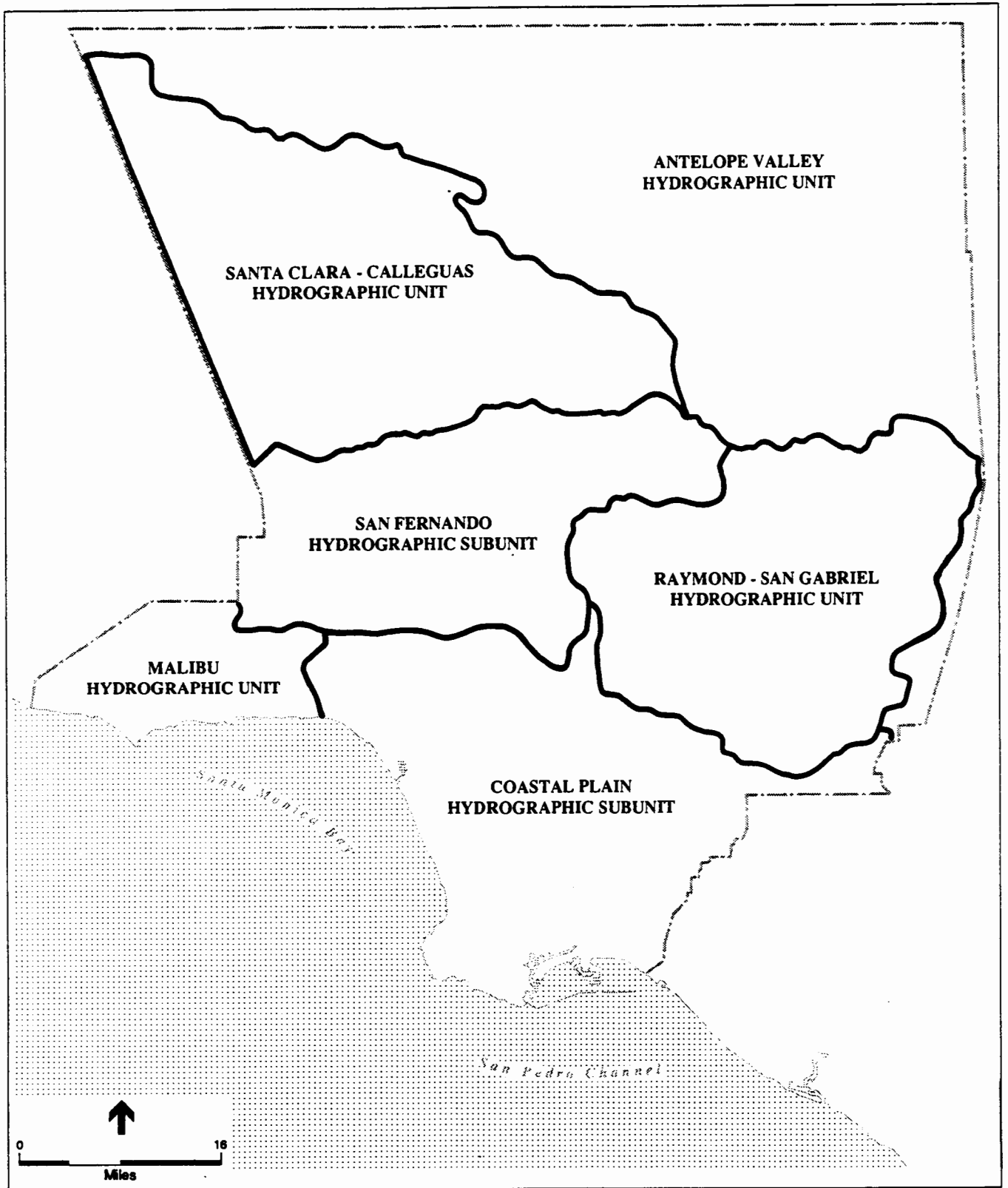
As shown previously in **Figure 17**, Los Angeles County is located within three relatively self-contained hydrographic (drainage) areas: (1) the Los Angeles River Basin (Basin 4B), (2) the eastern/"upper" portion of the Santa Clara River Basin (Basin 4A), and (3) the southern-most portion of the South Lahontan Basin (Basin 6B). Basin 4B includes all of the urbanized portions of Los Angeles County south of the San Gabriel Mountains drainage divide, a small area in the southeastern corner of Ventura County, and the San Pedro Channel Islands (Santa Barbara, Santa Catalina, and San Clemente Islands). Basin 4A includes most of Ventura County, very small portions of Santa Barbara and Kern Counties, and the Channel Islands (Anacapa and San Nicholas Islands), as well as the northwestern portion of Los Angeles County. Basin 6B includes the desert portions of Los Angeles County, all of Inyo County, most of Mono and San Bernardino Counties, and a small portion of Kern County.

Each basin is composed of successively-smaller hydrological subdivisions known as Units, Subunits, Areas, and Subareas. Those that make up the basins within Los Angeles County are shown in **Figure 20** and described below.

Los Angeles River Basin(4B)

Major hydrographic subdivisions in Basin 4B are the San Fernando Subunit, the Coastal Plain Subunit, the Raymond-San Gabriel Unit, the Malibu Unit, and the San Pedro Channel Islands Unit. Each of these contain a number of hydrographic Subunits and Subareas, collectively encompassing a total of 33 ground water basins. Twenty-one of the ground water basins are located in the first three Units/Subunits, or the greater metropolitan area; eight are located in the Malibu Unit and three in the San Pedro Unit.

Storage capacity in the greater metropolitan ground water basins is considerable. Spreading grounds adjacent to rivers and creeks throughout the metropolitan area facilitate percolation of natural runoff into these basins; artificial recharge with imported and reclaimed waters is also practiced extensively. Storage capacity in the Malibu and San Pedro Units is relatively small.



SOURCE: Water Quality Control Plans (4A, 4B, 6B); California Regional Water Quality Control Boards (Region 4; 6).

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Figure 20
Basin Hydrographic Subdivisions

III. Environmental Setting, Impacts and Mitigations

Major surface water features in the mainland portions of Basin 4B are listed below.

- San Fernando Subunit: Danton Creek, Tujunga Wash, Little Tujunga Canyon, Big Tujunga Canyon, Tujunga Dam, and Verdugo Wash.
- Coastal Plain Subunit: Ballona Creek, Los Angeles River, Arroyo Seco, Rio Hondo, San Gabriel River, and Coyote Creek.
- Raymond-San Gabriel Unit: Devil's Gate Dam, Eaton Wash, Arcadia Wash, San Jose Creek, Walnut Creek, Puddingstone Reservoir, Morris Reservoir, San Gabriel Reservoir, and East Fork San Gabriel.
- Malibu Unit: Malibu Creek, Las Vergenes, Malibu Lake, Triunfo Canyon, Westlake, and Hidden Valley.

Upper Santa Clara River Basin (4A)

The eastern portion of the Santa Clara-Calleguas Unit is the major hydrographic subdivision in the Los Angeles County portion of Basin 4A. Impoundment and recharge of surface water flows, which typically occur only during winter months, has been limited by the lack of sufficient storage facilities.

The Unit includes the following major surface water features: the Upper Santa Clara River, San Francisquito Canyon, Bouquet Canyon, Bouquet Reservoir, Mint Canyon, Castaic Creek, Castaic Lake, Elizabeth Lake Canyon, Piru Creek, and Pyramid Reservoir.

Southern South Lahontan Basin (6B)

The Antelope Valley Unit is the major hydrographic subdivision in the Los Angeles County portion of Basin 6B. The water-bearing alluvial deposits that underlay the entire valley are essentially an interconnected ground water body, rather than discrete units. The deposits are replenished periodically by percolation of runoff from the San Gabriel Mountains. Given the arid conditions, the valley is characterized by dry lakes and creek beds except during flash floods and occasional winter storms. The principal surface water features in the area are Lake Palmdale and Big and Little Rock Creeks.

Beneficial Uses

The State Water Resources Control Board (SWRCB) established a set of standard beneficial uses for surface and ground water resources throughout the state, in accordance with the objectives of the statewide Water Quality Control Planning Program. The complete list of uses and the ones that occur in each basin within Los Angeles County are shown in **Table 19**.

Specific water quality objective were established by SWRCB for each beneficial use in order to ensure its protection. The key element in providing this protection was SWRCB's enactment of Resolution No. 68-16, commonly referred to as the No Degradation Policy, which states that "Wherever the existing quality of water is better than the quality established in policies as of the date on which such policies become effective, such existing high quality will be maintained until it has been demonstrated to the State that any change will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial use of such water and will not result in water quality less than that prescribed in the policies."

Supply and Demand Characteristics

The fact that the demand for water exceeds the replenishment capability and safe yield of local supplies throughout many parts of Los Angeles County was reported in the Basin Plans prepared in 1970. In addition to the increased demand, the conversion of agricultural land to urban uses has reduced the surface area available for ground water recharge. Overdrafting of the ground water basins has also made them susceptible to increased levels of salinity and contamination, which render them unacceptable for domestic use. The current drought has exacerbated the situation, highlighting the historic need for water conservation.

The Metropolitan Water District (MWD) provides water to all areas within Los Angeles County except for the City of Los Angeles, which is within the jurisdiction of the Department of Water and Power (DWP), and the Cities of Alhambra, Azuza, Monterey Park, and Sierra Madre, as well as all of the desert communities. The amount of water that is provided by these purveyors fluctuates over time, depending on seasonal conditions, legal entitlements, financial considerations, and community preferences. The sources of the water, which include local and imported supplies, also vary over time under the same circumstances and conditions. However, although specific quantities and sources vary, certain trends are apparent, as noted below.

TABLE 19: BENEFICIAL USES FOR SURFACES AND GROUND WATER RESOURCES IN CALIFORNIA

Beneficial Use	Abrev.	Description	4Ba	4Ab	6Bb
Municipal and Domestic Supply	MUN	Community or military water systems from individual water supply systems	x	x	x
Agricultural Supply	AGR	Crop, orchard, and pasture irrigation; stock watering; support of vegetation for range grazing, farming, and ranching	x	x	x
Industrial Service Supply	IND	Uses not depending primarily on water quality such as mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection and oil well re-pressurization	x	x	x
Industrial Process Supply	PROC	Process water supply and all uses related to manufacturing of products	x	x	x
Ground Water Recharge	GWR	Natural or artificial recharge for future extraction and to maintain salt balance or halt saltwater intrusion into freshwater aquifers	x	x	x
Freshwater Replenishment	FRSH	Source of freshwater for replenishment of inland lakes and streams of varying salinities	x	x	
Navigation	NAV	Commercial and naval shipping	x		
Hydropower Generation	POW	Hydropower generation	x	x	

**TABLE 19: BENEFICIAL USES FOR SURFACES AND GROUND WATER RESOURCES
IN CALIFORNIA**

Beneficial Use	Abrev.	Description	4Ba	4Ab	6Bb
Water Contact Recreation	REC-1	All uses involving actual body contact with water, such as swimming, wading, water-skiing, skin diving, surfing, and sport fishing also therapeutic spas and other uses where ingestion of water is reasonably possible	x	x	x
Non-contact Water Recreation	REC-2	Uses involving presence of water but not requiring contact, such as picnicking, sunbathing, hiking, beach combing, camping, pleasure boating, tide pool and marine life study, hunting and aesthetic enjoyment, and sightseeing	x	x	x
Ocean Commercial and Sport Fishing	COMM	Collection of various types of fish and shellfish, including bait, and sport fishing in ocean, bays, estuaries, and similar non freshwater areas	x		
Warm Freshwater Habitat	WARM	Provides warm-water habitat to sustain aquatic resources associated with warm-water environment	x		x
Cold Freshwater Habitat	COLD	Provides cold-water habitat to sustain aquatic resources associated with cold-water environment	x	x	x
Preservation of Areas of Special Biological Significance	BIOL	Includes areas specifically designated by the SWRCB where natural water quality conditions will be maintained for protection of marine life	x		
Saline Water Habitat	SAL	Provides inland saline water habitat for aquatic and wildlife	x		

III. Environmental Setting, Impacts and Mitigations

TABLE 19: BENEFICIAL USES FOR SURFACES AND GROUND WATER RESOURCES IN CALIFORNIA

Beneficial Use	Abrev.	Description	4Ba	4Ab	6Bb
Wildlife Habitat	WILD	Provides water supply and vegetative habitat for maintenance of wildlife	x	x	x
Preservation of Rare and Endangered Species	RARE	Provides aquatic habitat necessary, at least in part, for survival of certain species established as being rare and/or endangered	x		
Marine Habitat	MAR	Provides for preservation of marine ecosystem including propagation and sustenance of fish, shellfish, marine mammals, waterfowl, and vegetation such as kelp	x		
Fish Migration	MIGR	Provides migration route and temporary aquatic environment for anadromous or other fish species	x		
Fish Spawning	SPWN	Provides high quality aquatic habitat especially suitable for fish spawning	x		
Shellfish Harvesting	SHELL	Collection of shellfish such as clams, oysters, abalone, shrimp, crab, and lobster for either commercial or sport purposes.	x		

- a. Los Angeles County portions only
- b. The types of beneficial uses occurring throughout Los Angeles County were initially identified in the early 1970's. It is assumed that areas containing rare and/or endangered species have been at least tentatively identified in the upper Santa Clara and Antelope Valley since that time.

SOURCE: State Water Resource Control Board

TABLE 20: ESTIMATED WATER CONSUMPTION IN LOS ANGELES COUNTY IN FISCAL YEAR 1990-91 (IN ACRE-FEET)

<u>Service Area</u>	<u>Local Sources</u>	<u>Imported</u>	<u>Total</u>
MWD/DWPa	475,000	100,179,000	100,654,000
Alhambra ^b	12,796		12,796
Azuza ^c	18,074		18,074
Monterey Park ^d	8,650		8,650
Sierra Madre ^e	2,700		2,700
Desert Communities ^f	<u>21,243</u>	<u>19,115</u>	<u>40,358</u>
	<u>538,463</u>	<u>100,198,115</u>	<u>100,736,578</u>

- a. MWD Services all areas except the City of Los Angeles, which is serviced by DWP, and the other listed communities. Source: Thomas Lovil, Sr. Public Affairs Representative; MWD; (213) 250-6648
- b. Source: Manny Magna, General Manager; Department of Public Works; (818) 570-5007.
- c. Sources: Terry Lewis, Customer Service Representative; City of Azuza Water Department; (818) 334-0215. Ruth Prime, Billing Supervisor; Azusa Valley Water District; (818) 334-7881.
- d. Source: Suzie Galstian, Public Works Technician; Department of Public Works; (818) 307-1280.
- e. Source: Kev Tcharkhoutian, Director of Public Works; Department of Public Works (818) 355-7135.
- f. Includes 85-90 percent of desert portion of Los Angeles County. Sources: Michael Steinbock, Engineering Aid; Palmdale Water District; (805) 947-411. Carolyn Golden, Secretary; Little Rock Creek Irrigation District; (805) 944-2015. Mustafa Arika, Supervising Civil Engineer I; Los Angeles County Water Works (which services Lancaster, portions of Palmdale, Pearblossom, High Vista, Acton Lake Los Angeles, Rock Creek, and a number of other smaller communities; (818) 458-7153.

Estimated water consumption in Los Angeles County for Fiscal Year 1990-91 is shown in Table 20. As will be shown by the table, approximately 73 percent of the total amount of water that was used in the County was imported (see the following subsection for a discussion of the conveyances used).

III. Environmental Setting, Impacts and Mitigations

Although this percentage appears to be fairly typical of metropolitan areas within the County, imported water has usually represented only about 50 percent of the total amount of water used in the desert communities (as shown in the table). It should be noted, however, that the Palmdale Water District was only able to import about half the amount of water requested in Calendar Year 1991, for a total of approximately 25 percent; other communities used more, balancing out the average to about 50 percent.

Information on the general status of local surface and ground water supplies, imported water, reclamation projects, and water conservation efforts are provided below.

Local Surface and Ground Water Supplies

Continued urbanization, with its attendant need for municipal/domestic and industrial supplies, is regarded as the principal reason for the ground water deficit in the Los Angeles River Basin (4B) portion of Los Angeles County. Although surface runoff into the metropolitan ground water basins has augmented natural and artificial recharge efforts, it has not been enough to offset the increased demand.

The Upper Santa Clara area was experiencing water shortages even in the early 1970's because of limited storage capacity coupled with the typical lack of dry weather flows in the local watercourses. An accelerated rate of growth since that time has aggravated the situation, resulting in an increased reliance on imported water.

In the Antelope Valley, ground water withdrawals for agricultural purposes caused a steady decline in water levels since the 1930's. It was estimated in the early 1970's that levels in the Palmdale/Lancaster area had dropped by as much as 180 feet, engendering requests for water entitlements from the State Water Project.

Imported Water

It is estimated that only about 30 percent of the total water that is used in Los Angeles County is provided by local surface and ground water supplies; the rest is imported. The State Water Project (SWP) brings water to Los Angeles County from northern California. Water from the Sierra Nevada's is delivered to the County via the Los Angeles Aqueducts. Colorado River water is transported through the Colorado River Aqueduct. The continued availability of water from these

III. Environmental Setting, Impacts and Mitigations

sources is uncertain, however, particularly at current levels. Competing uses and litigation are seen as the principal impediments, as summarized below.

- State Water Project (SWP): Based on existing facilities, the amount of water that is delivered to the County via the SWP is expected to decline by 2000 as uses in northern California increase. Efforts to offset this decline include implementation of a Coordinated Operation Agreement between the State and the U.S. Bureau of Reclamation, completion of additional pumping facilities, and transfer of water entitlements from agricultural to urban SWP contractors.
- Los Angeles Aqueducts: These aqueducts currently transport approximately 80 percent of the water used by the City of Los Angeles. This amount is expected to be reduced significantly, however, because of pending litigation and legislation. The purpose of the legislation is to reduce both the diversion of water from the Mono Basin and the amount of ground water that is pumped in the Owens Valley.
- Colorado River Aqueduct: The amount of Colorado River water that is conveyed to the County is expected to be reduced substantially with implementation of the Central Arizona Project (CAP). Efforts to offset this reduction include substituting urban uses for current agricultural uses.

Reclamation Projects

Reclaimed wastewater represents the largest undeveloped water resource that is available to offset future deficits in local and/or imported supplies. Some reclamation projects have been implemented in various locations within the County, notably for ground water recharge. Other typical uses include industrial cooling towers and firebreaks. Although other beneficial uses are being explored, public health considerations impose certain practical limitations. This is particularly true in highly urbanized areas, such as the Los Angeles River Basin (4B), where agricultural irrigation potentials are relatively small and where prevention of additional mineralization of the ground water is critical.

Water Conservation

Drought is an ever-present threat in arid environments where the typical rainfall is relatively modest. As a result, a succession of years in which there is less than normal amounts of rainfall can severely strain an already precarious relationship between the beneficial use of water and dwindling and/or

III. Environmental Setting, Impacts and Mitigations

deteriorating supplies. Such is the case with Southern California, which has most recently been experiencing drought conditions since approximately the mid-1980's.

Although knowledge of the inherent problems involved in developing arid environments is not new, it was not until the early 1970's that official policy mandated constructive action through the adoption of the statewide Basin Plans. In March 1989, the Southern California Water Committee and the (Northern California) Committee for Water Policy Consensus formed the State Water Conservation Coalition in order to ensure that appropriate actions were being and would continue to be taken.⁷ After several months of deliberations, the Coalition and the Urban Water Conservation Subgroup of the California Department of Water Resources established the Urban Water Conservation Best Management Practices (BMP's) process.

In accordance with the BMP process, urban water suppliers agree to aggressively study and implement conservation measures. The process is implemented through Memorandums of Understanding (MOU's) between the suppliers, public interest groups, and environmental organizations. As the regional planning agency, SCAG will review appropriate sections of general development project EIR's in terms of BMP policies and mitigation measures, in accordance with its Intergovernmental Review (IGR) Program. SCAG will also incorporate the related issues of water reclamation and conjunctive use programs into the Water Supply and Water Quality Element of the 1992 Comprehensive Regional Plan.

The BMP currently lists 16 water conservation methods, which can be grouped as follows:

(1) Interior and Exterior Water Audits, (2) Conservation Pricing and Financial Incentives, (3) Building and Plumbing Codes, (4) Conditions of Planning and Zoning Approvals (5) EIR Mitigation Measures, and (6) Education, Information, and Coordination Programs. It is anticipated that cognizance of the BMP and these measures during preparation of environmental documents will become increasingly more important.

Water Quality Conditions

In general, the quality of the water that is used in Los Angeles County is relatively good in areas that are receiving imported water. In areas that rely principally on local supplies, however, the water quality varies considerably. Given the anticipated cut-backs in imported water, the quality of local surface and ground water supplies will continue to be of concern.

A summary of the general quality of the local surface and ground water supplies in each basin is provided below.

Los Angeles River Basin (4B)

The quality of the ground water in the San Fernando Subunit is good, although it has deteriorated to some extent due to overdrafting and intrusion of poorer quality ground water. The Coastal Plan Subunit continues to experience salt water intrusion along the coast due to historic oil extraction activities. Elsewhere in the Subunit, the quality of the ground water is relatively good. Localized areas in the Raymond-San Gabriel Unit are exhibiting high levels of nitrates, toxins, and Total Dissolved Solids (TDS). A major Superfund ground water decontamination project is currently in progress at a landfill site in the southeastern portion of the Unit. Ground water in the Malibu Unit is considered unusable because of improper sewage disposal practices.

Surface water in the Los Angeles River system exhibits high pH, increased nitrate/nitrite and chlorine levels, and low dissolved oxygen. Urbanized portions of the San Gabriel River are showing minor water quality problems due to urban runoff and point source discharges. Water quality in the mountain portions of the system, however, appears to be good. The Malibu Creek drainage system, which has been degraded by historic wastewater discharge practices, shows high TDS levels.

Upper Santa Clara River Basin (4B)

Ground water quality is considered generally good in the Upper Santa Clara, although it deteriorates to some extent near the Los Angeles/Ventura County line. High TDS concentrations, however, are common throughout the system.

Reservoir water in the basin is principally imported via the State Water Project and the Los Angeles Aqueducts and is therefore of high quality. Surface water quality in the creeks is relatively good, except during low flows.

Southern South Lahontan Basin (6B)

Ground water quality problems in the desert portions of Los Angeles County include those related to overdrafting and pollution from mining and sewage wastes. There appear to be few water quality problems, however, in the surface water supplies.

IMPACTS

As shown in Table 21, implementation of the proposed Congestion Management Program (CMP) could have a direct adverse impact on water resources in Los Angeles County through the construction and operation of CIP projects. This would include projects that are currently under construction and in the planning stages, as well as routes designated for interim status and further study. An indirect impact could also result from any urban deconcentration inducing impacts of the CMP.

CIP program components that have the potential for creating adverse effects include the following improvements to the highway and roadway system: (1) operating new or expanded highway routes; and (2) constructing stations, park and ride lots, as well as widening or expanding existing highway routes. Improvements to the Transit Network that could cause adverse impacts would principally involve construction of various rail options and fixed bus routes.

The impacts on beneficial uses, the supply and demand balance, and water quality that are expected to be associated with implementation of the above-listed components of the CMP are discussed below.

Beneficial Uses

Direct Impacts: Construction of CIP projects could affect beneficial uses in two ways: through the destruction of habitat and through changes in surface water quality of surface features resulting from construction activities. Well-established, officially-recognized, profitable, and/or obvious beneficial uses would not be expected to be adversely affected by implementation of the CMP. Some uses, however, could be impaired or eliminated as the result of project specific routings and design. These uses would generally involve unobtrusive and/or "unofficial" ecological functions that do not signal their existence via obvious signs. These uses would include the following:

- "Unofficial" Ground water Recharge areas, such as open fields and agricultural plots, particularly those with sizable alluvial deposits.
- Warm and Cold Habitats, particularly if the watercourse and/or the surrounding area were disturbed, denuded, rerouted, and/or channelized.

TABLE 21: POTENTIAL WATER RESOURCE IMPACTS OF THE CMP

Environmental Indicator	Direct Effects		Indirect Effect
	Construction	Operation	Urban/ Suburban Growth
Surface Stream Discharge		X	X
Surface Water Quality	X		
Temperature			
Biochemical Oxygen Demand			X
Dissolved Oxygen			X
Suspended Solids	X	X	X
Turbidity	X	X	X
Total Dissolved Solids		X	X
pH			
Bacteria and Viruses			X
Nitrogen			X
Phosphorus		X	X
Hardness			
Iron and Manganese			
Chlorides		X	X
Heavy Metals			
Radioactivity			
Pesticides			
Toxic Substances			
Stratification			
Flooding			X
Groundwater			
Quantity		X	X
Quality			X
Erosion	X	X	X
Sedimentation	X	X	X
Water Demand			X
Wastewater System			X

SOURCE: Environmental Impact Analysis Handbook, edited by John G. Rau and David Wooten, page 6-45.

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- Areas of Special Biological Significance, Wildlife Habitat, and Rare and Endangered Species, which can be virtually "invisible" and where any disturbance could be fatal.
- Currently unidentified Fish Spawning watercourses that are disturbed, rerouted, and/or channelized, although the emergence of new routes is considered a relatively remote possibility.

Indirect Impacts: Should implementation of the CMP result in increased urban sprawl or concentration or expansion of development in areas containing beneficial uses, significant indirect impacts could result.

Supply and Demand

Direct Impacts: Implementation of CMP elements would not significantly increase water use in the region. With the exception of projects, such as highways, which contain large landscaped areas, little water would be required to serve most capital improvement projects, resulting in few project specific impacts.

Indirect Impacts: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on the water supply by decreasing the amount of open land that is currently available for ground water recharge, either through natural means or through use of reclaimed water. Efforts to foster reclamation projects to increase local ground water supplies could be significantly curtailed because of the area requirements associated with the reuse of treated effluent. Lastly, the interdependent effects of deconcentration would increase the need for and restrictiveness of large-scale water conservation programs. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.

Water Quality

Direct Impacts: Implementation of the CMP could have a short-term adverse effect on nearby surface water bodies during construction of CIP related projects. These effects would include increased sedimentation engendered by excavation and grading activities, as well as pollution from vehicular oils and grease. Long-term impacts could result from increased highway and transit

associated facilities operations and their associated pollution (such as vehicular oils and grease emissions). The level of pollution produced would be a function of the number and lengths of trips made on these new facilities.

In areas where there are no nearby water bodies, the bulk of the sediments and pollutants would probably be carried into the storm drain. This could result in adverse impacts on distant receiving waters, including the ocean and any intervening surface water bodies.

Adverse impacts on non-proximate or intervening surface water bodies and ground water supplies would not be expected.

MITIGATION MEASURES

Measures to reduce or eliminate direct adverse effects on beneficial uses, the direct and indirect effects on water supply, and the direct impacts on water quality associated with CIP projects are as follows:

F.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the water resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:

- For large-scale capital improvement projects, such as freeway, HOV, rail and interchange projects, appropriate ecologically-oriented maps are obtained and used during the planning process for CIP projects. Every effort is made to avoid areas that are currently used or are anticipated to be used for ecologically beneficial purposes. Every effort is made to minimize all disturbances in areas where construction is mandatory. All areas are restored to their original pre-construction condition, including the re-introduction of all uncontaminated soil and the replacement of all native vegetation. In the coastal zone, coastal zone planning and management programs reduce adverse impacts to coastal water quality and preserve or improve areas of special water quality significance such as bays and estuaries.

III. Environmental Setting, Impacts and Mitigations

- For large-scale CIP projects such as freeway, HOV, rail and interchange projects, a comprehensive site investigation is conducted by ecological and water quality specialists to provide input into the above planning and mitigation design process and to confirm expected onsite conditions prior to the initiation of demolition and construction activities.
- Planning, construction, and operational activities are coordinated with appropriate ecological and water resources agencies and are conducted in accordance with the requirements of the Federal Water Pollution Control Act, the Water Quality Act and the Clean Water Act, including NPDES and Section 404 permit requirements.
- Natural conditions are maintained or simulated wherever possible to minimize effects at stream crossing. Single-span bridges are used when feasible.
- Erosion control measures and runoff management, such as drainage channels, detention basins, and vegetated buffers, are employed to prevent pollution of adjacent water resources by runoff from transportation facilities. Wherever physically feasible, detention basins are equipped with oil and grease traps which are cleaned regularly. Treatment and disposal of excavated materials is well-planned.
- Water conservation measures listed in the BMP are incorporated into the planning and design of CIP projects and their mitigations.
- Use of permeable surfaces and channelization of flows to recharge areas are incorporated into project design, where possible, to promote water percolation and removal of metals.
- All demolition, construction, and operational activities are conducted in accordance with all applicable regulatory requirements.

Mitigation measure A.3, repeated below would reduce long-term water quality impacts associated with CIP project operation:

A.3 The LACTC shall investigate the use of other mobility and system performance indices such as Vehicle Miles Traveled and Average Vehicle Ridership and shall compare the effectiveness of such indices with LOS as standards for determining both system mobility and motor vehicle

emission performance. These supplemental measures shall be incorporated into the program if determined to be effective in reconciling localized decreases in service against regional improvements.

Mitigation measure C.3, repeated below would reduce the indirect impacts of the CMP of beneficial uses and the water supply/demand balance:

C.3 The LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional goals will be proposed in consultation with local, regional, and state agencies

ADVERSE IMPACTS

With implementation of the mitigation measures listed above, program level water resource impacts on beneficial uses, supply and demand, and water quality are not anticipated to be significant. The potential for significant adverse water resource impacts to remain after implementation of CIP project specific mitigations developed as part of CIP project specific environmental review, can only be assessed on a project specific basis.

III.G. BIOLOGICAL RESOURCES

SETTING

Los Angeles County contains a rich and extensive array of biological resources. As a result of the wide range in topography and climate in the County, a wide variety of plant and animal life, including rare and endangered species, can be found throughout the County.

Urban development, along with the development of an extensive transportation network, have disturbed, limited, and wiped out many plant and animal communities in the County. The construction of highways and other facilities have displaced the habitats of plants and animals, and the corresponding growth in air and water pollution have greatly impacted the biological resources of

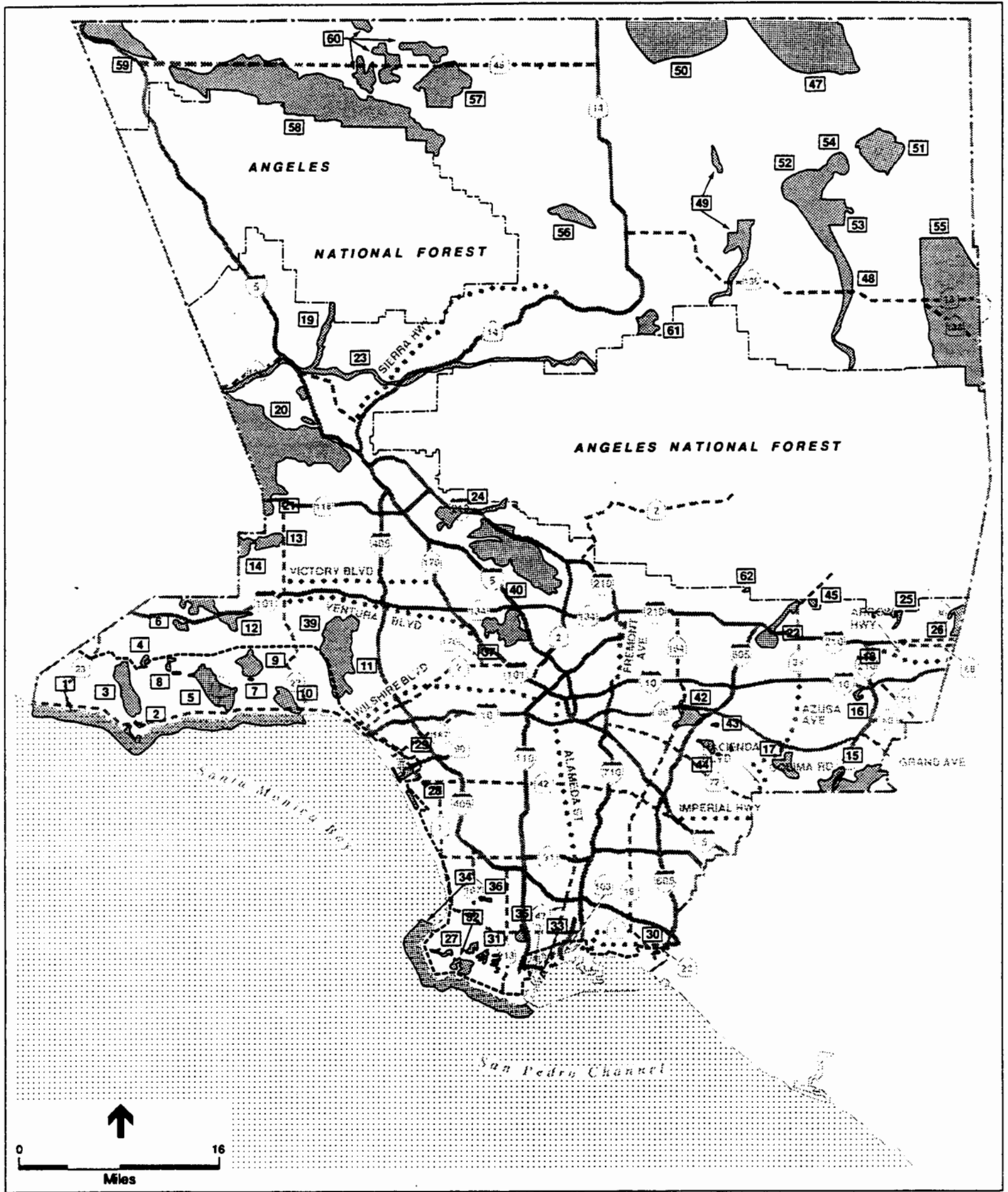
III. Environmental Setting, Impacts and Mitigations

the County. As a result, the diverse plant and animal life of the County has been relegated to the isolated open spaces that remain.

The County of Los Angeles designated 61 Significant Ecological Areas (SEAs) in its 1980 General Plan. The SEAs were selected for their value as habitat migration corridors for wildlife; as strongholds for threatened plants, birds, or other animals; or as the best remaining examples of ecological niches once common in Southern California. The SEAs vary in size from a few acres to a few thousand acres. Their primary function is to preserve habitats for rare, endangered, and threatened plant and animal species. There are eight classifications of SEAs, as follows:

- Class 1: The habitat of rare, endangered and threatened plant or animal species;
- Class 2: The habitat of plant or animal species that are either one of a kind, or are restricted in distribution on a regional basis;
- Class 3: The habitat of plant or animal species that are either one of a kind, or are restricted in distribution in Los Angeles County;
- Class 4: A habitat which serves as a concentrated breeding, feeding, resting, or migrating grounds, and is limited in availability;
- Class 5: Biological resources of scientific interest, because of extreme physical/geographical limitations, or unusual variations in a population;
- Class 6: Game species habitat or fisheries;
- Class 7: An area that preserves relatively undisturbed examples of the natural biotic communities in Los Angeles County;
- Class 8: Special Areas.

Figure 21 shows the location of the SEAs in Los Angeles County; Table 22 lists the SEAs and their primary and secondary classifications. Thirty-eight (38) of the 61 SEAs are located within



SOURCE: Department of Regional Planning, County of Los Angeles.

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Figure 21
Location of Significant Ecological Areas

III. Environmental Setting, Impacts and Mitigations

TABLE 22: SIGNIFICANT ECOLOGICAL AREAS IN LOS ANGELES COUNTY

	No.	Class 1	Class 2	Class 3	Class 4	Class 5	Class 6	Class 7	Class 8
Agus Amarga Canyon	32			x	o	o		o	
Alamitos Bay	30	x	o	o	o	o		o	
Alpine Buttes	52							x	
Ballons Creek	29	x	o	o	o	o		o	
Big Rock Wash	48				x	o		o	
Buzzard Peak/San Jose Hills	16							x	
Chatsworth Reservoir	13		x	o				o	
Cold Creek	9			x		o		o	
Desert-Montana Transect	55							x	
Dudlea Densiflora Pop., Glendora	45		x	o		o		o	
Edwards Air Force Base	47	x		o		o		o	
El Segundo Dunes	28	x	o	o	o	o		o	
Encino Reservoir	39							x	
Fairmont and Antelope Buttes	57				x	o		o	
Galium Grande Pop., Monrovia	62	x	o	o	o	o		o	
Griffith Park	37							x	
Harbor Lake Regional Park	35			x	o	o		o	
Hepstic Gulch	7			x		o		o	
Joshua Tree Woodland Habitat	60							o	
Kentucky Springs	61		x	o		o		o	
Las Virgenes	6					x		o	
Little Rock Wash	49				x	o		o	
Lovejoy Buttes	53							x	
Lyon Canyon	63							x	
Madrona Marsh	36			x	o	o		o	
Malibu Canyon & Lagoon	5		x	o	o	o	o	o	
Malibu Coastline	1		x	o	o	o	o	o	
Malibu Creek State Park Buffer Area	8								x
Palo Comado Canyon	12			x				o	
Palos Verdes Peninsula Coastline	34		x	o	o	o	o	o	
Piute Butte	54							x	
Point Dume	2			x	o	o		o	
Portabl Ridge/Liebre Mountain	58					x		o	
Portuguese Bend Landslide	27			x	o	o		o	
Powder Carry on/Puente Hills	17							x	
Rio Hondo College Wildlife Sanc.	43								x
Ritter Ridge	56					x		o	
Rolling Hills Canyons	31			x	o	o		o	
Rosemond Lake	50		x	o		o		o	
Saddleback Butte State Park	51							x	o
San Antonio Canyon Mouth	26			x		o		o	
San Dimas Canyon	25			x	o	o		o	

x = Principal classification;
o = Secondary classification

Amended - See
ERRATA Notes

TABLE 22: SIGNIFICANT ECOLOGICAL AREAS IN LOS ANGELES COUNTY

	No.	Class 1	Class 2	Class 3	Class 4	Class 5	Class 6	Class 7	Class 8
San Francisquito Canyon	19	x	o	o	o	o	o	o	
Santa Clara River	23	x	o	o	o	o		o	
Santa Fe Dam Floodplain	22			x		o		o	
Santa Susana Mountains	20							x	
Santa Susana Pass	21	x	o	o	o	o		o	
Simi Hills	14							x	
Sycamore and Turnbull Canyons	44							x	
Tehachapi Foothills	59					x		o	
Tamescal, Rustic, Sullivan Canyons	11							x	
Terminal Island	33	x	o	o	o	o		o	
Tenner Canyon/Chino Hills	15							x	
Tujunga Valley/Hansen Dam	24	x		o		o		o	
Tuna Canyon	10			x	o			o	
Upper La Sierra Canyon	4	x	o	o		o		o	
Verdugo Mountains	40							x	
Valley Oaks Savannah, Newhall	64			x				o	
Way Hill	18	x	o	o	o	o		o	
Whittier Narrows	42			x	o	o		o	
Zuma Canyon	3			x	o			o	

x = Principal classification;
o = Secondary classification

unincorporated Los Angeles County area. The remaining 23 SEAs are located within municipal boundaries, where the County has no land use authority.

Although not designated as SEAs, the Angeles and Los Padres National Forests are the largest and most important significant ecological areas in the County. The forests cover a vast area in the mountains of Los Angeles County and support ecosystems which have retained their natural character, possessing many unique resources.

Since the development of the SEA definitions, additional species have been classified as rare, threatened or endangered or identified as candidate species under the Federal and California Endangered Species Acts. Additional species may also be identified over the life of the CMP. The United States Fish and Wildlife Service and the California Department of Fish and Game share responsibility for management and protection of biological resources. Both maintain and update lists of endangered species and their known habitats. Both provide formal and informal consultation on endangered species. The California Department of Fish and Game has established the California

III. Environmental Setting, Impacts and Mitigations

Natural Diversity Data Base - RareFind, a program that inventories the State's special status species and sensitive natural communities, and also provides information on their current listing status.

These agencies provide up-to-date information of special status species.

IMPACTS

As indicated in Figure 21, the CMP roadway network currently passes through the following 32 SEAs:

Alamitos Bay	30
Ballons Creek	29
Big Rock Wash	48
Buzzard Peak/San Jose Hills	16
Chatsworth Reservoir	13
Desert-Montana Transect	55
Fairmont and Antelope Buttes	57
Griffith Park	37
Harbor Lake Regional Park	35
Joshua Tree Woodland Habitat	60
Las Virgenes	6
Little Rock Wash	49
Malibu Canyon & Lagoon	5
Malibu Coastline	1
Palo Comado Canyon	12
Point Dume	2
Portabl Ridge/Libre Mountain	58
Powder Carry on/Puente Hills	17
San Antonio Canyon Mouth	26
San Francisquito Canyon	19
Santa Clara River	23
Santa Fe Dam Floodplain	22
Santa Susana Mountains	20
Santa Susana Pass	21
Tehachapi Foothills	59
Terminal Island	33
Tenner Canyon/Chino Hills	15
Tujunga Valley/Hansen Dam	24
Tuna Canyon	10
Verdugo Mountains	40
Way Hill	18
Whittier Narrows	42

Direct Impact: To the extent that the CMP is successful in improving or maintaining current Levels of Service on the roadway network in Los Angeles County in the vicinity of these SEAs, the CMP

would have a beneficial impact on biological resources as a result of reduced congestion and air pollution and inhibitions on additional noise increases. However, if the CMP results in the diversion of traffic to corridors passing through SEAs, or from already-congested corridors to corridors which are currently relatively free-flowing, leading to increased levels of congestion, traffic, and air pollution in proximity to SEAs, the CMP may have an adverse effect on biological resources. Some CMP CIP projects may be routed through SEAs. Any capital improvement projects located in or near SEAs pose the potential for significant biological impacts.

Amended - See
ERRATA Notes

Indirect Impacts: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, particularly areas containing significant ecological resources, which has not been anticipated in the regional plans, the CMP could have a negative effect on biological resources. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.

MITIGATION MEASURES

The following mitigation measures address the direct impacts of the CMP of biological resources:

G.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the biological resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:

- Prior to any new construction on existing or proposed highways within the boundaries of an SEA, the need for construction is reviewed and substantiated, and alternative alignments or appropriate mitigation measures are investigated and implemented as feasible. If no feasible alternative or mitigation is found, the project is performed in the most environmentally sensitive manner possible.

- Site-specific studies are required for each capital improvement project located in the vicinity of an SEA to determine whether significant plant or animal life is present in a

III. Environmental Setting, Impacts and Mitigations

proposed alignment and the level of impact on those resources. In consultation with the California Department of Fish and Game and the U.S. Fish and Wildlife Service, detailed biological surveys are conducted prior to the adoption of roadway alignments which have the potential to adversely affect significant biological resources.

Recommended - See
ERRATA Notes

- Appropriate consultation with the California Department of Fish and Game occurs to determine if special status species, not identified under the SEA program, occur in the project vicinity.
- Vegetation removal occurs only where absolutely necessary for grading; revegetation with appropriate native plants is to be implemented as feasible.
- Capital improvement projects which take place in recognized wetlands comply with local, state, and federal regulations governing the protection of these areas.
- Capital improvement projects within the coastal zone comply with coastal zone planning and local government management programs which prevent or reduce impacts on biological resources within the coastal zone.

G.2 The LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(2) of the Streets and Highways Code for acquisition or enhancement of resource lands to mitigate the loss of, or the detriment to, resource lands lying within the right-of-way acquired for proposed transportation improvements

Mitigation measure C.3, repeated below would reduce the indirect impacts of the CMP on biological resources:

C.3 The LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional goals will be proposed in consultation with local, regional, and state agencies

ADVERSE IMPACTS

With implementation of the mitigation measures listed above, program level biological resource impacts are not anticipated to be significant. The potential for significant adverse biological resource impacts to remain after implementation of CIP project specific mitigation's developed as part of CIP project specific environmental review, can only be assessed on a project specific basis.

III.H. CULTURAL RESOURCES

SETTING

Archaeological and Paleontological Resources

Prior to European contact and missionization of southern California, the Los Angeles County area was occupied by Chumash and Gabrielino Indians. These native Americans followed a hunting and gathering way of life and lived in a variety of settlements throughout the area. These native American peoples, living in the area prior to the arrival of the Europeans, developed a complex pattern of resource exploitation. The complexity is reflected in the artifacts, features and sites which make up the only tangible remains of their cultures, which existed for thousands of years. Major sites containing data for the reconstruction of these systems still exist in many areas of the County. Within the southern California region, there are over 13,000 known or surveyed archaeological sites. The greatest concentration of unknown or undiscovered archaeological and paleontological sites occurs in undeveloped mountain, desert, and coastal areas. These previously undeveloped areas of southern California are currently undergoing vast changes and are rapidly becoming urbanized.

Los Angeles County is one of the richest areas in the world for both fossil marine vertebrates and land vertebrates from rocks deposited over the last 25 million years. Perhaps one of the richest and most famous fossil deposits is located at Rancho La Brea. Although Rancho La Brea has been highly publicized, there are many other areas of Los Angeles County which contain equally important fossil occurrences. There are over 1,100 known vertebrate fossil localities within the county, mostly in the hillside areas. In addition, the entire floor of the Los Angeles Basin, San Fernando Valley and Antelope Valley are mantled with Quaternary sediments similar to those at Rancho La Brea. Information on Archaeological and Paleontological resources is maintained at the Archaeological

III. Environmental Setting, Impacts and Mitigations

Information Center, Institute of Archaeology at UCLA and at the Department of Archaeology at California State University, Northridge.

Historic Resources

The designated historic sites in Los Angeles County are located primarily in the urbanized areas. Historic resources includes buildings, objects, or sites of historic value or interest. Many monuments to the historical past still exist in Los Angeles County forming an essential link with the present. There are missions and the remnants of the great ranchos which once covered southern California, as well as the routes of early explorers and historical trails. There are also stagecoach stations, forts, railroad depots, and the homes of prominent people whose lives are a part of the area's history.

Numerous historical sites within the County have been identified by state and local groups. Such sites are associated with the Hispanic (early 1500's to middle 1800's) and American (middle 1800's to present) periods of Los Angeles's cultural heritage. The Federal Government through the National Register of Historic Places and the State of California through Registered Historical Landmark Criteria have established guidelines for determining a structure's or site's historical significance. In addition, a number of local jurisdictions, including the City of Los Angeles have developed procedures for designating cultural monuments.

The sites that have been designated by the Federal, State and local governments represent aspects of local history and include: residences, churches, public buildings and commercial structures which are distinguished for their design or architectural style, historic trees, battlefields, military campsites, stations along historic transportation routes, and places associated with historically notable persons, activities or events. These sites are usually marked by a plaque or monument. In some instances, several historical sites are located near one another (for example,, neighborhoods of Victorian houses, homogenous business districts, and early settlements). Several sites which are not individually of outstanding significance may as a group be considered historically significant and be designated historic districts.

Historical sites are located for the most part, in the accessible urbanized areas of the County, with the largest number in an east/west belt across the southern county, clustering primarily in the Hollywood and Central Los Angeles areas. In Los Angeles County there are approximately 245 National Register entries, 11 National Landmarks, 25 State Landmarks, and 41 local designations. In addition, the City of Los Angeles has listed over 500 Historic-Cultural Monuments.

III. Environmental Setting, Impacts and Mitigations

The historic designations definitions include the following:

National Register

National Register refers to the National Register of Historic Places which is a record or list of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology, engineering and culture. The register is maintained by the Secretary of Historic Sites Act of 1935 and of the National Historic Preservation Act of 1956. According to the National Register of Historic Places, a recognized site, structure and/or object of local, state, and national significance is placed on the register only when those properties have retained enough physical integrity to accurately convey their appearance during their period of historical significance. A complete listing of National Register sites is located in Appendix ^D_E of this report.¹¹ Amended - See ERRATA Notes

In addition to the National Register, there is the National Trust for Historic Preservation which is a private, non-profit organization chartered by the U.S. Congress to encourage public participation in preservation efforts. It serves primarily in an advisory and review capacity in the preparation of criteria, guidelines and forms used in the nomination process to the National Register. The National Trust suggest the following historical and cultural significance criteria:

- Outstanding historical and cultural significance in the nation or in the state, region, or community it best exemplifies, and from which the visitor may grasp in three-dimensional form one of the larger patterns of the American Heritage.
- Identified with the lives of historic personages or with important events in the main currents of national, state or local history.
- Embody the distinguishing characteristics of an architectural type - specimen, inherently valuable for a study of a period - style or method of construction; or a notable work of a master builder, designer or architect whose individual genius influenced his age.

11 Federal Register, Volume 48, Number 23, Wednesday, February 2, 1965, Rules and Regulations.

III. Environmental Setting, Impacts and Mitigations

- Preference should be given to those structures or sites where there is a preponderance of original material or other physical remains which have retained their integrity. ¹²

National Landmark

National Historic Landmarks include districts, sites, buildings, structures or objects in public or private ownership, judged by the Secretary of Historic Sites to possess national significance in American history, archeology, architecture, engineering and culture and so designated by the Secretary. ¹³

State Landmark

A State Landmark as defined by the California Office of Historic Preservation, recognizes only sites and structures of statewide significance. A State Landmark may identify a site and/or structure of architectural, historical, archaeological or cultural significance, including significant trees, hedgerows and other plant materials.¹⁴

Local Designation

Local Designation is an historic district, structure or place of importance to a local community.

City of Los Angeles Historic-Cultural Monument - The Cultural Heritage Commission of the Cultural Affairs Department of the City of Los Angeles has set criteria for naming a Historic-Cultural Monument. This criteria includes any site (including trees or other plant life located thereon), building or structure of particular historic or cultural significance to the City of Los Angeles. The monument can be an historic structure or site in which the broad cultural, political, economic or social history of the nation, state or community is reflected or exemplified or identified at that site. Also, the site may identify historic personages or important events in the main currents of national, state, or local history. The site or structure may also embody an architectural-type specimen,

12 Criteria for Evaluating Historic Sites and Buildings, Preservation Leaflet Series, National Trust or Historic Preservation, 1973.

13 Federal Register, Volume 48, Number 23, Wednesday, February 2, 1965, Rules and Regulations.

14 Office of Historic Preservation, California Department of Parks and Recreation, Registration Programs.

inherently valuable for a study of a period of style or method of construction or notable work of a master builder, designer, or architect whose individual genius influenced his/her age. A complete listing of Los Angeles Historic-Cultural Monuments is located in Appendix D of this report.¹⁵

E

IMPACTS

Amended - See
ERRATA Notes

Amended - See
ERRATA Notes

Archaeological and Paleontological Resources

Direct Impacts: While prehistoric sites or artifacts could be discovered in the urbanized areas of Los Angeles County, it is likely that any archaeological sites on the surface would have been destroyed during past urbanization. Generally in the urbanized or urbanizing areas, archaeological and paleontological resources are uncovered during the construction phase of a project.

Indirect Impacts: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on archaeological or paleontological resources. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.

Historic Resources

Definition of the Network

Direct Impacts: The National Register entries, National Landmarks, State Landmarks, local designations, and Los Angeles Historic-Cultural Monuments are located along or near many of the streets and highways of the CMP Roadway System. Table 23 identifies the number of listed cultural/historic resources, located within approximately one mile of the CMP roadway segments. Segments not included in the Table did not have any proximate historic resources. The designations used in the table are as follows: National Register Entry (NR),

15 Section 22.130 of the Los Angeles Administrative Code Pertaining to the Cultural Heritage Commission.

III. Environmental Setting, Impacts and Mitigations

TABLE 23: CULTURAL/HISTORIC RESOURCES WITHIN ONE-MILE OF THE CMP NETWORK

State Route	CMP Roadway System Freeway/Arterial Name	NR (a)	NL (b)	SL (b)	LD (b)	LAM (c)
1	PCH, Palisades Beach Road, Lincoln Blvd., Sepulveda Blvd.	13	1	1	1	
2	Lincoln Blvd. Santa Monica Blvd., Alvarado Street, Glendale Blvd. Glendale Freeway, Angeles Crest Highway	22		3	2	2
5	Santa Ana Fwy., Golden State Fwy.	11	1	3	4	
10	Santa Monica Fwy., San Bernardino Freeway	34		1	8	
14	Antelope Valley Freeway	1		1		
19/164	Lakewood Blvd., Rosemead Blvd.		1	4		
22	7th Street, Garden Grove Freeway	1				
27	Topanga Cyn. Blvd.			1	1	
39	Azusa Avenue, San Gabriel Cyn. Road			1		
42/105	Manchester Blvd., Firestone Blvd.	2		1		1
47	Vincent Thomas Bridge, Henry Ford Avenue, Alameda Street	1		1	1	
57	Orange Freeway	1				
60	Pomona Freeway	5		1	1	
66	Foothill Blvd.	8				
71	Corona Expressway	1				
72	Whittier Blvd.	7				
91	Artesia Blvd., Gardena Fwy., Artesia Fwy.	2		1	1	
101	Santa Ana Fwy. (Spur), Hollywood Fwy., Ventura Fwy.	29	1	2	7	

TABLE 23: CULTURAL/HISTORIC RESOURCES WITHIN ONE-MILE OF THE CMP NETWORK - (Continued)

State Route	CMP Roadway System Freeway/Arterial Name	NR (a)	NL (b)	SL (b)	LD (b)	LAM (c)
103	Terminal Island Fwy.				1	
110	Gaffey Street, Harbor Fwy., Pasadena Fwy, Arroyo Parkway	78			6	1
118	Simi Valley Fwy., San Fernando Valley Fwy.	2	1		3	
126	Henry Mayo Drive, Magic Mountain Parkway, San Fernando Road			1		1
134	Ventura Freeway	3				
170	Highland Avenue, Hollywood Fwy.	12			2	5
187	Venice Blvd.	2			2	3
210	Foothill Fwy.	37	3	3	2	
213	Western Avenue	5				4
405	San Diego Fwy.	5	2	2	5	
605	San Gabriel River	1	1			
710	Long Beach Fwy., Pasadena Avenue, St. John Avenue	13			2	
Highway Gaps/Connectors with Other Counties						
Imperial Highway	Route 5 to Orange County	1				
Major Arterials						
Alameda Street	Port of Los Angeles to Route 101	20				
Wilshire Blvd.	Ocean Blvd. to Route 110	29				
Major Arterials						
Ventura Blvd.	Topanga Cyn. Blvd. to Lankershim Blvd.	1		1	2	1

TABLE 23: CULTURAL/HISTORIC RESOURCES WITHIN ONE-MILE OF THE CMP NETWORK - (Continued)

State Route	CMP Roadway System Freeway/Arterial Name	NR (a)	NL (b)	SL (b)	LD (b)	LAM (c)
Victory Blvd.	Topanga Cyn. Blvd. to Route 170				4	
Wilshire Blvd.	Ocean Blvd. to Route 110			4	1	12

- a. NR counts are based on the National Register list contained in Appendix D
- b. Designations for SL, LD, NL are from Figure 21 of the RMP EIR
- c. LAM counts are from the Historic-Cultural Monument listing contained in Appendix D 1973.

SOURCE: Environmental Science Associates

National Landmark (NL), State Landmark (SL), Local Designation (LD), and City of Los Angeles Historic-Cultural Monument (LAM).

Inclusion of a roadway or highway segment on the CMP network could ultimately lead to improvement projects on or near that segment, should service deteriorate below CMP Level of Service standards. This could potentially lead to impacts on historic structures. However, it is not possible to evaluate the potential impact until specific projects are proposed.

Transit Network

Direct Impact: In general, service increases or decreases along routes included in the transit network are not anticipated to result in cultural or archeological resource impacts, since it is generally capital projects which would pose the potential for impact to structures or archaeological resources.

Transportation Demand Management (TDM)

Direct Impact: Implementation of successful TDM strategies would reduce the potential for significant impacts by reducing the need for capital improvements which could disturb cultural or archeological resources.

Capital Improvement Program

Direct Impact: Site-specific studies required for each component project in the CMP with the potential for significant impact will determine whether significant archeological or cultural resources are actually present in a proposed alignment and the level of potential impact on the resources. General impacts may be discerned as follows: projects involving the construction of new roads, interchanges, overcrossing, undercrossings, or park-and-ride lots in previously undisturbed areas, or widening improvements which would extend into previously undisturbed areas have the potential for significant adverse archeological impacts, since they might affect resources in unsurveyed areas. Projects involving improvements in existing urban or transportation corridors and other improvements to already existing infrastructure or operations may have significant impacts on cultural resources.

Indirect Impacts: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on cultural resources in these areas. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.

MITIGATION MEASURES

The National Environmental Policy Act of 1969, Section 4(f), the Antiquities Act of 1906, and the California Environmental Act of 1970, protect historical, paleontological and archaeological resources. These acts require that lead agencies mitigate identified adverse impacts to cultural and scientific resources on a project level.

H.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of

III. Environmental Setting, Impacts and Mitigations

individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the cultural resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas into the EIR:

- The project sponsor contacts either the archeological resource information depository at UCLA or Cal State Northridge to determine the status of each site or corridor proposed for development, if it is determined during project-specific environmental review that the site or corridor is likely to contain archaeological resources.
- A professional archaeologist is retained to aid in the assessment of those sites or corridors considered to have moderate to high likelihood of containing archaeological resources, and to recommend a course of action for preservation of significant resources.
- During construction, at sites judged to have moderate to high likelihood of containing paleontological resources, a qualified paleontologist approved by the California Archaeological Inventory Regional Information Center is on call to remove fossil remains found during construction. If fossil remains are discovered during construction, all activity at the fossil site shall be stopped until the paleontologist has removed the remains.
- For those sites or corridors for which environmental review or subsequent analysis indicates a less than moderate likelihood of containing archaeological resources, the following measures are taken: If any archaeological materials are encountered during the course of the project development, the project shall be halted. The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University, Northridge, or a member of the Society of Professional Archaeologist (SOPA), or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report are submitted to the UCLA Archaeological Information Center. All specimens collected are donated to the most appropriate educational research not possible to evaluate the potential impact until specific projects are proposed.
- The environmental assessment adequately evaluates the potential for significant impacts to nearby historic resources, and includes appropriate mitigations.

Amended - See
ERRATA Notes

Mitigation measure C.3, repeated below would reduce the indirect impacts of the CMP on historic resources:

- C.3 The LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional goals will be proposed in consultation with local, regional, and state agencies.

ADVERSE IMPACTS

With implementation of the mitigation measures listed above, program level cultural resource impacts are not anticipated to be significant. The potential for significant adverse cultural resource impacts to remain after implementation of CIP project specific mitigation's developed as part of CIP project specific environmental review, can only be assessed on a project specific basis.

III.I. PUBLIC SERVICES

SETTING

Police

The Los Angeles County Sheriff's Department provides police protection throughout the unincorporated areas of Los Angeles County. Individual cities generally provide their own police protection, although some contract with the Sheriff's Department or a nearby larger city for police services. The County Sheriff's Department currently employs approximately 7,975 sworn personnel countywide.¹⁶

The California Highway Patrol (CHP) provides law enforcement services on all state and interstate highways, as well as back-up services on federal lands such as national forests and Bureau of Land

¹⁶ Los Angeles County Sheriff's Department, telephone conversation, June 4, 1992.

III. Environmental Setting, Impacts and Mitigations

Management Land. Approximately 1,000 CHP officers currently patrol Los Angeles County highways.¹⁷ State rangers police state park and recreation areas.

Current levels of traffic congestion impede police responses to emergency situations. In the case of automobile accidents, the ability of ambulances, fire equipment, and tow-trucks to respond is also slowed due to congestion. Difficulty in clearing accident scenes in turn contributes to even greater levels of congestion, further slowing responses to emergencies. The current average response time of the CHP to emergency situations is approximately 12 to 15 minutes.²

Fire Services

Fire protection services are provided in the unincorporated areas of Los Angeles County by the County Fire Department, which currently employs approximately 3,130 fire fighting personnel.¹⁸ Fifty of the 88 cities in Los Angeles County contract with the County Fire Department for fire protection; the other 38 provide their own service. The City of Los Angeles has the largest of these Fire Departments, employing approximately 2,500 personnel.¹⁹ The U.S. Forest Service provides fire protection for all national forest lands within the County, and the Los Angeles County Department of Forestry serves the northeastern area of the County.

As with police services, current levels of traffic congestion impede fire department responses to emergency situations, particularly on freeways. The ability of paramedics, ambulances, and other emergency vehicles to respond is also slowed due to congestion. Difficulty in clearing accident scenes in turn contributes to even greater levels of congestion, further slowing responses to emergencies.

Parks and Recreation

Parks and recreational facilities include public open space, athletic facilities, amphitheaters, golf courses, and equestrian facilities. The Los Angeles County Department of Parks and Recreation

¹⁷ Lt. William Pasley, Communication and Traffic Operations, Southern Division (Los Angeles County), California Highway Patrol, telephone conversation, June 4, 1992.

¹⁸ Capt. Steve Valenzuela, Los Angeles County Fire Department, telephone conversation, June 10, 1992.

¹⁹ City of Los Angeles, Fire Department, telephone conversation, June 10, 1992.

operates and maintains public parks and recreational facilities throughout the County. Individual cities also maintain and operate their own parks and recreational facilities. **Table 24** summarizes the major parks and recreational facilities in proximity to the CMP roadway network; a complete listing of parks and recreational facilities in Los Angeles County can be found in Table H-1 in Appendix H.

Maintenance of Public Facilities and Other Governmental Services

Caltrans is responsible for the operation and maintenance of State highway routes within Los Angeles County. Local jurisdictions also have responsibility for the operation and maintenance of local streets and roads. All state highways, as well as regionally significant arterials are included on the CMP Highway systems. One of the primary goals of the CMP is to maintain Level of Service Standards on these routes.

IMPACTS

Police

Direct Effects: The construction of individual CMP capital improvement projects may temporarily slow police responses and disrupt police access.

To the extent that the CMP is successful in improving or maintaining current levels of service on the roadway network in Los Angeles County, police response to emergency situations will be improved.

Fire Services

Direct Effects: The construction of individual CMP capital improvement projects may temporarily slow fire protection responses and inhibit fire protection.

To the extent that the CMP is successful in improving or maintaining current levels of service on the roadway network in Los Angeles County, fire protection response to emergency situations will be improved.

TABLE 24: LOS ANGELES COUNTY RECREATIONAL AREAS IN PROXIMITY TO THE CMP ROADWAY NETWORK

Recreational Area	City
Alondra Park Golf Course	Lawndale
Annandale Golf Course	Pasadena
Arroyo Seco Golf Course	South Pasadena
Arroyo Seco Park	South Pasadena
Balboa Golf Course	Encino
Bellflower Golf Center	Bellflower
Belvedere Park	Los Angeles
Bicentennial Park	Pico Rivera
Bixby Village Golf Course	Long Beach
Bonelli Regional County Park	San Dimas
Brookside Park	Pasadena
California Country Club	Whittier
Compton Golf Course	Compton
Diamond Bar Golf Course	Diamond Bar
Dominguez Golf Course	Carson
Echo Park	Los Angeles
El Dorado Golf Course	Long Beach
El Paseo De Cahuenga	Los Angeles
El Pueblo De Los Angeles	Los Angeles
El Segundo Golf Course	El Segundo
Elysian Park	Los Angeles
Encino Golf Course	Encino
Ernest E Debs Regional Park	Los Angeles
Friendship Park	Rancho Palos Verdes
Glenoaks Golf Course	Glendora
Griffith Park	Los Angeles
Hancock Park	Los Angeles
Hansen Dam Golf Course	Pacoima
Hansen Dam Park	San Fernando Valley
Harbor Park Golf Course	Wilmington
Harding Mun Golf Course	Los Angeles
Hollenbeck Park	Los Angeles
Hungry Valley Recreation Area	Los Angeles County
Industry Hills Golf Course	Industry
La Canada Flintridge Golf Course	La Canada
Lakewood Golf Course	Lakewood
Lincoln Park	Santa Monica
Los Angeles Country Club	Los Angeles
Los Encinos State Historical Park	Los Angeles
Los Feliz Golf Course	Los Angeles
Mac Arthur Park	Los Angeles

Amended - See
ERRATA Notes

TABLE 24: LOS ANGELES COUNTY RECREATIONAL AREAS IN PROXIMITY TO THE CMP ROADWAY NETWORK

<u>Recreational Area</u>	<u>City</u>
Montebello Municipal Golf Course	Montebello
Monterey Park Golf Course	Monterey Park
Mountaingate Golf Course	Los Angeles
Otterbein State Recreational Center	Rowlands Heights
Palisades Park	Los Angeles
Palm Lake Golf Club	Pomona
Peck Park & Rec Center	San Pedro
Porter Valley Country Club	Los Angeles
Recreation Park Golf	Long Beach
Reseda Park & Recreational Center	Reseda
Sepulveda Dam Recreational Area	Encino
Skylinks Golf Course	Long Beach
South Hills Park	Glendora
Studio City Golf Course	N Hollywood
Surfrider Bch State Park	Malibu Beach
Topanga State Park	Los Angeles
Valencia Golf Course	Valencia
Valley Plaza Park	North Hollywood
Van Nuys Golf Course	Van Nuys
Verdugo Hills Golf Course	Tujunga
Victoria Golf Course	Carson
Vista Valencia Golf Course	Valencia
Warner Ranch Park	Los Angeles
Weddington Park	Los Angeles
Weschester Recreational Center	Los Angeles
Westchester Golf Course	Los Angeles
Westlake Village Golf Course	Westlake Village
Whittier Narrows	South El Monte
Wilson Municipal Golf Course	Los Angeles
Woodley Golf Course	Van Nuys

SOURCE: Environmental Science Associates, Inc.

Parks and Recreation

Direct Effects: To the extent that the CMP is successful in improving or maintaining current levels of service on the roadway network in Los Angeles County; the CMP would have a beneficial impact on parks and recreational facilities as a result of reduced congestion, air pollution, and ease of access.

III. Environmental Setting, Impacts and Mitigations

Some CMP capital improvement projects may require additional right-of-way adjacent to existing parks and recreational facilities, reducing the already limited parkland in the County. Increased traffic volumes and/or speed in proximity to parks and recreational facilities could result in increased noise impacts and inhibit access to facilities. Site-specific studies required for each capital improvement project of the CMP with a potential for adversely affecting parks and recreational facilities will determine the level of impact on those facilities.

Maintenance of Public Facilities and Other Governmental Services

Direct Effects: The CMP would have a beneficial impact on local government services as a result of mobility improvements from the improved level of service data provided for planning, the standardization of regional impact analysis provided through the Land Use Analysis Program and as a result of effective transportation improvements programming.

Local governments' compliance with the CMP could result in the diversion of local government personnel and revenues for conducting traffic monitoring, implementing TDM responsibilities, and implementing the Land Use Analysis responsibilities.

MITIGATION MEASURES

The following measures will mitigate the direct effects of the project on police and fire services and on parks and recreation:

- I.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the public service impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:
 - Prior to the construction of individual CMP capital improvement projects, the lead agency consults with affected police and fire departments to ensure these agencies adequate access to the affected portions of the CMP roadway network.

- An assessment of the potential impacts to parks and recreational facilities is included in the environmental assessment of any CMP transportation facilities to be located in proximity to parks and recreational facilities which includes an assessment of traffic, noise, and access impacts.

Amended - See
ERRATA Notes

- I.2 The LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(2) of the Streets and Highways Code for acquisition or enhancement of resource lands to mitigate the loss of, or the detriment to, resource lands lying within the right-of-way acquired for proposed transportation improvements

The following measures address the government services impacts of the CMP:

- I.3 The LACTC shall work with local jurisdictions to investigate a county-wide process to deal with future year CMP implementation issues.
- I.4 The LACTC shall continue to work with public and private interests regarding CMP requirements to minimize adverse public/private cost impacts associated with the CMP.

ADVERSE IMPACTS

With implementation of the mitigation measures listed above, program level public services impacts are not anticipated to be significant. The potential for significant adverse police, fire and parks and recreational impacts to remain after implementation of CIP project specific mitigation's developed as part of CIP project specific environmental review, can only be assessed on a project specific basis.

IV. IMPACT OVERVIEW

A. GROWTH INDUCING IMPACTS

Regional Growth

The CMP is designed to respond to and help to manage the congestion resulting from anticipated growth in the region. This growth is projected to be due primarily to natural increase rather than net in-migration.¹ Approximately 63% of the anticipated growth in population is anticipated to result from natural increase. The remaining 37% of anticipated growth is projected to result from an excess of in-migration over out-migration. However, growth due to net in-migration is anticipated to be the result of 3.3 million individuals migrating to the area from other countries, rather than domestic migration. These would be new residents primarily attracted to the economic opportunities available in the United States. The Los Angeles region acts as the port of entry for large numbers of pacific rim and Latin American migrants.

The purpose of the CMP is to maintain established levels of service on the County's transportation network. The CMP triggers remediation activities only on those portions of the system which degrade to LOS E, or which experience additional degradation of LOS F conditions. Given the nature of the anticipated population growth and the purpose of the CMP, it is not anticipated that the CMP would have a growth inducing impact on regional population.

Growth Redistribution

The question then is, does the CMP have the potential to result in a redistribution of population and employment within the region which could be classified as a growth inducing impact? As detailed in Chapter III, the CMP could have the potential to create two major kinds of redistributive impacts. These are deconcentration impacts and localized density inducing impacts.

¹ Please see the discussion in the Regional Growth Management Plan. Pages II-2 to II-4.

Significant factors continue to exist in the Los Angeles region which encourage a deconcentration of land use and the associated development of land in undeveloped areas. These factors have led to Los Angeles's development as one of the world's first polycentric cities or urban regions. These factors include: 1) the desire to purchase affordable housing which has led to development in less developed areas of Los Angeles County and in neighboring counties; 2) a desire to attain a quality of life which avoids the consequences of urban development, such as congestion; and, 3) Los Angeles's reliance on the automobile as the major form of transportation in the region.

When compared to the power of locational decisions that are based on market forces and quality of life issues, the deconcentration effect of the CMP is arguably not significant. In fact, elements of the CMP may marginally serve to inhibit the current rate of deconcentration by reducing the attractiveness of the automobile as the major form of transportation and increasing the attractiveness of alternative travel modes. These elements include, the CMP's TDM element and transit related capital improvements.

Both very good and very bad levels of service can encourage deconcentration. CMP LOS standards have been established at the threshold of system capacity, where congestion itself may create a disincentive for continued development, and for development to move to less congested areas. Because of the magnitude of congestion in Los Angeles County, the challenge of the CMP will be to attain LOS standards. It is unlikely that improvements on the system will bring LOS above standard. Because the CMP is not anticipated to lead to substantial improvements above current levels of service and associated increases in travel speed which would make housing in outlying areas more attractive to the region's workers it should not further kind of deconcentration that results from ease of mobility. Similarly, by maintaining mobility at established levels of service, the CMP will not encourage deconcentration related to avoidance of congestion.

The CMP statute requires development of deficiency plans to mitigate or effect increases in congestion beyond established LOS levels. In order to avoid congested areas, and any costs associated with developing in areas subject to deficiency plans, developers may prefer to initiate new projects in relatively uncongested areas. Therefore, the CMP may provide an additional incentive for growth in outlying areas, especially in northern Los Angeles County. However, this effect is considered minor, when compared with existing incentives to locate new development in less congested areas. Moreover, such development is consistent with the

regional growth anticipated in the RMP analysis. Thus, the CMP is consistent with regional growth projections and is not expected to have a significant impact on deconcentrated or decentralized growth. The CMP's CIP is primarily intended to meet CMP LOS goals and standards.

The CMP's land use analysis element is designed to encourage the consideration of the impact of development decisions on the CMP system. However, land use decisions themselves remain the responsibility of local jurisdictions. The CMP does not have a statutory mechanism for minimizing the effect of existing forces that encourage deconcentration. Therefore, the CMP's land use analysis component is not anticipated to affect deconcentration, but will provide greater information regarding the impact of new development to local officials.

In summary the impact of the CMP on deconcentration is anticipated to be negligible when compared to existing market and quality of life issues that are encouraging deconcentrated development. The portions of the CMP which discourage automobile use and encourage transit use may serve to somewhat inhibit deconcentration.

The other potential localized growth inducing affect of the CMP would be the encouragement of increased concentration around transportation centers and corridors. CIP-related improvements could potentially increase the density of trips and traffic in center areas such as near transportation centers, rail transit stations, park and ride lots, etc. This would generally be considered a positive impact of the CMP, since most local jurisdictions are interested in increasing density in center areas. Thus, the CMP is consistent with local growth and density goals.

B. CUMULATIVE IMPACTS

As previously discussed, the CMP is both consistent with and would aid achievement of the Regional Mobility Plan and the Air Quality Management Plan which are the two key components of the region's existing growth management strategy. Cumulative development in the region is both described in these two regional plans and controlled by the General Plans of the 89 local

TABLE 25: CUMULATIVE DEVELOPMENT

	<u>SOUTHERN CALIFORNIA</u>	<u>LOS ANGELES REGION</u>
Population	Would increase to 18.28.9 million by the year 2010.	Would increase to 10.2 million by the year 2010.
Employment	Would increase to 5.9 million by the year 2010	Would increase to 4.1 million by the year 2010
Housing Units	Would increase to 7.3 million by the year 2010	Would increase to 4.0 million by the year 2010
Transportation	<p>VMT would increase to 284,382,0000 by the year 2010.</p> <p>1,846 lane-miles of new and expanded mixed flow facilities and 1,251 lane miles of added high-occupancy vehicle facilities would be constructed.</p> <p>The following improvements would be installed: 600 freeway ramp meters; synchronization of over 8,000 signalized intersections; and physical improvement of 500 intersections to reduce vehicle-hours of delay.</p>	<p>The facilities described in the setting section of the transportation section of Chapter III would be constructed.</p> <p>The STIP projects listed in Appendix D and the TSM projects listed in Table 5 would be built.</p>
Air Quality	<p>Emission in tons per day would by as follows in the year 2010:</p> <p>ROG: 231 NOX: 281 SOX: 34 PM10: 44 CO: 2,259</p>	

SOURCE: SCAG, RMP EIR

jurisdictions in the County.² Table 25 below summarizes the projections of cumulative development contained in the RMP and GMP EIRs which evaluate the potential impacts of the growth and transportation projects anticipated to occur by the year 2010.

The environmental effects of the transportation improvements planned for the Los Angeles region to accommodate anticipated growth are analyzed in the Environmental Impact Report for the Regional Mobility Plan. The effects of these cumulative transportation improvements are summarized below:

- **Mobility and Access** - Cumulative transportation improvements would have a beneficial effect on mobility and access by maintaining mobility in an environment of continuing population and economic growth. This is considered a significant beneficial cumulative impact.
- **Air Quality** - TDM, TSM, growth management and AQMP TCMs will reduce the air impacts of growth and travel. This is considered a significant beneficial cumulative impact.
- **Energy** - Increased energy consumption will result from growth and increased travel. RMP gasoline consumption in the year 2010 would exceed 1984 levels. However, with implementation of mitigation measures identified in the regional growth management plans (i.e. the RMP, AQMP and GMP) and supporting EIRs there would be a beneficial cumulative impact on energy .
- **Geology and Seismicity** - Construction of additional structures in areas of geologic hazards, including fault zones, liquefaction, landslide and subsidence areas will result in increased risks. This is considered a non-significant adverse cumulative impact.

² The EIRs for the Regional Mobility Plan and Growth Management Plan have been previously incorporated herein by reference. The Final Environmental Impact Report for the Los Angeles County General Plan (dated March 1981) is herein incorporated by reference (SCH # 87-121613). These documents are available for review at the LACTC's offices located at 818 West Seventh Street, Los Angeles, 90010.

- **Biological Resources** - Several of the new highways and transportation corridors planned for the region traverse sensitive areas and will cause a loss of habitat or risk to rare or endangered species. This is considered a significant adverse cumulative impact.
- **Water Resources** - Several of the regional projects may change flow patterns, increase runoff, and reduce runoff water quality. This is considered a non-significant cumulative adverse impact with implementation of mitigation measures identified in the regional growth management plans and supporting EIRs.
- **Visual Resources** - With proper design, new regional facilities will have a beneficial impact by opening access to scenic resources. Construction of new freeways and transit guideways, especially aerial alignments can disrupt or block views. This is considered a significant adverse cumulative impact.
- **Noise** - Lower congestion may reduce trip diversion and neighborhood traffic intrusion resulting in a cumulative beneficial impact. New roadways and transit facilities constructed in the region will add to existing noise sources. Aerial alignments will expand noise contours. Alternative work schedules may create more traffic noise during sensitive times of day. This is considered a significant adverse cumulative impact, which would be further studied through project level EIR's.
- **Cultural Resources** - Construction of new facilities without proper safeguards could result in destruction of cultural or scientific resources. This is considered a non-significant cumulative adverse impact with implementation of mitigation measures identified in the regional growth management plans and supporting EIRs.
- **Social Impacts** - Regional transportation improvements will improve access to and ties between communities of the region. Transit measures will improve access to transportation facilities for the growing transit dependent population. These would be beneficial cumulative impacts. Some new facilities will result in displacement of houses and businesses. Construction and operation of facilities may disrupt communities. This is considered a significant cumulative adverse impact with implementation of mitigation measures identified in the regional growth management plans and supporting EIRs.

- **Urban Form and Growth** - Overall, the RMP and cumulative transportation improvements accommodate planned growth and incorporate measures to improve job/housing balance. This is considered a significant beneficial cumulative impact.
- **Regional Economy** - Regional transportation improvements will provide access to employment centers, facilitate goods movement and stimulate local economies. This is a beneficial cumulative impact. Some aspects of RMP TDM measures are perceived as a cost to business. On balance, however, Regional economic impacts are considered a significant beneficial cumulative impact.

C. SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

With implementation of the mitigation measures described in Chapter III, no significant direct or indirect program level adverse impacts would result from the CMP. The potential for significant adverse project level impacts to remain after implementation of CIP specific mitigation and mitigation developed as part of CIP project specific environmental review, can only be assessed on a project specific basis. For this reason, the EIR identifies the potential for significant unavoidable CIP project-level adverse impacts on: Land Use, Transportation, Noise, Air Quality, Geology, Water Resources, Biological Resources, Cultural Resources and Public Services.

D. SHORT-TERM USE VERSE LONG-TERM PRODUCTIVITY

As with the RMP, many of the potential adverse impacts associated with the CMP are due to construction of proposed transportation facilities; although construction activities for major facilities may be phased over several years, resultant impacts must be analyzed in the context of the long-term productivity of the environment - especially in mobility and related subject areas. This section summarizes the potential impacts regarding trade-offs between short-term value and long-term productivity of the environment, associated with the CMP. These are the same as for the RMP.

Land Use - With mitigation the CMP is not anticipated to result in a long-term impact on the land use pattern described in regional and local planning documents.

Transportation - The CMP would result in long-term improvements in mobility and accessibility throughout the region.

Air Quality - The CMP will help to further long-term attainment of air quality standards and cleaner air.

Noise - The CMP would result in short-term intermittent impacts in localized areas as a result of construction of CMP projects. Regional noise levels are not anticipated to change significantly in the long-term.

Geology - The CMP could result in replacement and upgrading of many facilities with improvements better able to withstand geologic hazards. However, construction of CMP projects could result in alterations to topography in the long-term.

Water Resources - Construction impacts on water resources would be short-term and could be mitigated; long-term changes to water courses could potentially occur as a result of channelization and construction of culverts, etc.

Biological Resources - With mitigation the CMP is not anticipated to result in a long-term impacts on biological resources.

Cultural Resources - The CMP is not anticipated to result in long-term impacts to cultural resources with proper mitigation.

Public Services - Without mitigation, the CMP could result in a long-term diversion of local jurisdiction resources to maintenance of the CMP system. Short-term impacts on police and fire services resulting from CMP construction activities could be mitigated. The CMP is anticipated to result in a long-term improvement in fire and police response times.

V. ALTERNATIVES

This section of the EIR includes an analysis of four alternatives to the proposed CMP. The first two alternatives are no project alternatives. They are included because CEQA mandates the discussion of a no project alternative in an EIR¹ and because they serve to highlight the effects of CMP adoption. Alternative A is the no change from existing conditions version of the no project alternative and Alternative B is the non-adoption of a CMP version of the no project alternative. Neither of these alternatives would comply with the requirements of the CMP statute and are therefor not considered feasible.

The other two CMP alternatives analyzed in this chapter are a TDM intensive alternative and a capital intensive alternative. Each of these alternatives has been designed to be consistent with the adopted RMP.

In adopting the RMP, SCAG analyzed five alternatives to the RMP.² Those five alternatives are described below. Table 26 compares the potential impacts of the adopted RMP and the five RMP alternatives for the six county SCAG region.

- **RMP Alternative 1 - The No-Project Alternative.** This alternative consisted of the 1987 existing transportation system and construction of the transportation system improvements funded as of 1987. This alternative was designed to be analogous to the potential impact of EPA sanctions on the South Coast Air Basin for nonattainment of federal clean air standards for ozone and carbon monoxide. These sanctions would result in a construction ban on new large stationary sources and the withholding of federal highway construction funds. Population growth and housing construction would continue to occur, with a greater share of housing construction focused in outlying housing-rich subregions as a result of the EPA imposed stationary source construction ban.

¹ See CEQA Guidelines, section 15126, subd. (d)(2).

² Please see Chapter 6 of the Draft EIR for the Regional Mobility Plan (State Clearinghouse number 87-121613) previously incorporated herein by reference.

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

Evaluation Criteria	1984 RMP Base Year	Adopted RMP	Alternative 1 RMP No-Project Alternative	Alternative 2 Facilities Response	Alternative 3 Facilities Emphasis with Jobs/Housing Balance	Alternative 4 TDM with Balanced Growth	Alternative 5 TDM with Baseline Growth
MOBILITY							
Vehicle Miles Traveled (Thousands)	221,292	284,382	376,187	339,481	325,173	281,226	304,594
Vehicle Hours Traveled (Thousands)	6,343	7,850	19,575	9,172	8,578	7,779	8,556
Hours of Delay (Thousands)	629	899	10,132	1,153	849	895	1,300
Precent Delay	10% (6 minutes/hour)	11% (7 minutes/hour)	52% (32 minutes/hour)	13% (8 minutes/hour)	10% (6 minutes/hour)	11% (7 minutes/hour)	15% (9 minutes/hour)
Speed (mph):							
All Facilities	35	36	19	37	38	36	36
Freeways	47	45	24	48	50	45	42
Miles of Congestion:							
AM Peak	452	280	2,564	676	403	220	525
PM Peak	856	612	4,567	1,063	752	611	1,042
Transit Mode Split Home-to-Work	6.58%	19.3%	5.10%	7.64%	7.42%	19.40%	19.45%

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Average Auto Occupancy Home-to-Work	1.129	1.186	1.150	1.202	1.201	1.187	1.187
AIR QUALITY							
On-Road Mobile Source Emissions (tons/day)							
ROG	698	231	345	244	238	218	226
NOx	899	281	618	523	508	440	465
SOx	34	36	54	38	37	32	34
PM-10	41	44	62	53	51	44	47
CO	5,417	2,259	4,066	3,013	2,958	2,732	2,800
ENERGY							
Fuel Consumption (million gal/day)							
Gasoline	13.8	13.5	22.7	16.0	15.3	13.4	14.4
Diesel	2.0	1.7	2.9	2.1	2.0	1.7	1.9
GEOLOGY/SEISMICITY							
Added Highway Lanes Intersecting Faults	N/A	160	8	330	260	96	144

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

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New Rail Corridors Intersecting Faults	N/A	23	2	17	12	14	14
NATURAL RESOURCES							
Expanded Highway Facilities in Urbanizing Areas	N/A	1,490	176	1,771	1,567	895	900
VISUAL RESOURCES/AESTHETICS							
Miles of Elevated Highways	N/A	20	0	460	400	12	25
Parks and Designated Natural Areas Subject to Intrusion by Added Highway Facilities	N/A	57	0	55	57	34	41

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

Evaluation Criteria	1984 RMP Base Year	Adopted RMP	Alternative 1 RMP No-Project Alternative	Alternative 2 Facilities Response	Alternative 3 Facilities Emphasis with Jobs/Housing Balance	Alternative 4 TDM with Balanced Growth	Alternative 5 TDM with Baseline Growth
NOISE							
Line miles of Added Highway Facilities:							
-in Urban Areas	N/A	2,500	330	6,800	5,700	1,500	2,300
-in Non-urban Areas	N/A	133	80	340	140	80	90
REGIONAL ECONOMY							
Annual Cost of Congestion (\$1987, billions)	\$1.8	\$2.6	\$26.3	\$9.3	\$6.7	\$2.6	\$3.7
Annual Personal Vehicle Costs (\$1987, billions)	\$15.7	\$19.9	\$26.6	\$24.0	\$23.0	\$19.9	\$21.6
Commuter Flow Efficiencies:							
Average Home-to-Work Trip Length (miles)	10.7	11.1	12.4	12.3	11.1	11.1	12.3

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

Evaluation Criteria	1984 RMP Base Year	Adopted RMP	Alternative 1 RMP No-Project Alternative	Alternative 2 Facilities Response	Alternative 3 Facilities Emphasis with Jobs/Housing Balance	Alternative 4 TDM with Balanced Growth	Alternative 5 TDM with Baseline Growth
Average Home-Work Trip Time (minutes)	19	19	40	21	18	19	21
Average Home-Work Trip Time (minutes)	34	36	19	36	37	36	35
SOCIAL IMPACTS							
Potential Displacements Associated With At-Grade Expansion of Existing Highways							
Acres (12'/lane)	N/A	3,670	N/A	6,000	5,400	2,200	3,400
Dwelling Units (6/acre)	N/A	22,170	N/A	35,700	32,100	13,300	20,400
Persons (2.5/unit)	N/A	55,670	N/A	89,200	80,360	33,400	50,900
Acres Subject to Construction Impacts (within 100 feet of new highway construction)	N/A	21,340	N/A	22,700	22,300	12,800	14,400
Transit Availability:							
Miles of Rail -- Heavy and Light Rail	N/A	360	42	367	294	397	497

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

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SOCIAL IMPACTS -- REGIONAL LEVEL							
Changes in Real And Perceived Attractiveness of the Region	Increasing congestion during peak hours	<p><u>Job Housing Balance:</u> Could promote development of additional commercial centers</p> <p><u>Demand Management:</u> TDM (parking costs, tolls, etc.) could deter businesses and workforce from remaining in or relocating to the region</p>	Unrelieved congestion could deter business and experienced workforce from relocating to or remaining in the region	Availability of transit & increased mobility could enhance the image of the region	<p><u>Facility Construction:</u> Additional facilities could enhance image of region as in Alternative 2</p> <p><u>Job Housing Balance:</u> Could promote development of additional commercial centers within the region</p>	<p><u>Job/Housing Balance:</u> Same as Alternative 3</p> <p><u>Demand Management:</u> Mobility restrictions (e.g. parking costs, tolls, etc.) could deter businesses and experienced workforce from remaining in or relocating to the region</p>	<p><u>Facility Construction:</u> Same as Alternative 2</p> <p><u>Demand Management:</u> Same as Alternative 4</p>

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

Evaluation Criteria	1984 RMP Base Year	Adopted RMP	Alternative 1 RMP No-Project Alternative	Alternative 2 Facilities Response	Alternative 3 Facilities Emphasis with Jobs/Housing Balance	Alternative 4 TDM with Balanced Growth	Alternative 5 TDM with Baseline Growth
SOCIAL IMPACTS -- COMMUNITY LEVEL							
Use of Local Streets (Non-Arterial) During Peak Commute Periods	Increasing use of local streets during commute period	<p><u>Jobs/Housing Balance:</u> Would promote dispersion of commercial and social facilities closer to residential areas</p> <p><u>Demand Management:</u> Additional reduction in commuter use of local streets (reduced trips)</p>	Unrelieved congestion could result in heavy use of local streets and neighborhood disruption	Local street use reduced significantly - less neighborhood disruption	<p><u>Facility Construction:</u> Same as Alternative 2</p> <p><u>Job/Housing Balance:</u> potential for increased commercial traffic on arterials in predominately residential areas</p>	<p><u>Job Housing Balance:</u> Same as Alternative 3</p> <p><u>Demand Management:</u> Additional reduction in commuter use of local streets (reduced trips)</p>	<p><u>Facility Construction:</u> Same as Alternative 2</p> <p><u>Demand Management:</u> Same as Alternative 4</p>

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

Evaluation Criteria	1984 RMP Base Year	Adopted RMP	Alternative 1 RMP No-Project Alternative	Alternative 2 Facilities Response	Alternative 3 Facilities Emphasis with Jobs/Housing Balance	Alternative 4 TDM with Balanced Growth	Alternative 5 TDM with Baseline Growth
Changes in Use of Community and Local Facilities	N/A	<p><u>Demand Management:</u> Could promote demand for service-oriented facilities closer to residential areas for homeworkers and/or extended hours of service for flextime/straggered schedules</p> <p>Higher parking costs in CBD or other central areas, could affect retail activities</p>	Arterial congestion could adversely affect local commercial areas	Increased access to local and regional facilities	<p><u>Job/Housing Balance:</u> Would promote dispersion of commercial and social facilities closer to residential areas</p> <p><u>Facility Construction:</u> Same as Alternative 2</p>	<p><u>Demand Management:</u> Could promote demand for service-oriented facilities closer to residential areas for homeworkers and/or extended hours of service for flextime/staggered schedules</p> <p>Higher parking costs in CBD or other central areas, could affect retail activities</p> <p><u>Job/Housing Balance:</u> Same as Alternative 3</p>	<p><u>Facility Construction:</u> Same as Alternative 2</p> <p><u>Demand Management:</u> Same as Alternative 4</p>

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

Evaluation Criteria	1984 RMP Base Year	Adopted RMP	Alternative 1 RMP No-Project Alternative	Alternative 2 Facilities Response	Alternative 3 Facilities Emphasis with Jobs/Housing Balance	Alternative 4 TDM with Balanced Growth	Alternative 5 TDM with Baseline Growth
SOCIAL IMPACTS -- EMPLOYMENT LEVEL							
Changes in Workplace	Increasing congestion creates problems for business transactions	<p><u>Demand Management:</u> Modified Work Week encourages:</p> <ul style="list-style-type: none"> transit use/car pools job sharing written communication increased productivity <p>May create problems for:</p> <ul style="list-style-type: none"> business administration (e.g. employee benefits) communication between workers/other businesses <p><u>Job/Housing Balance:</u> Similar to Alternative 3</p>	Unrelieved congestion could increase worker tardiness, increase delivery costs, reduce customer/client interaction	Increased opportunity for smoother business operations and customer/client interaction compared to No Project	<p><u>Facility Construction:</u> Same as Alternative 2</p> <p><u>Jobs/Housing Balance:</u> Also could isolate business from city center</p> <p>Reduces interaction between businesses</p>	<p><u>Demand Management:</u> Modified Work Week encourages:</p> <ul style="list-style-type: none"> transit use/car pools job sharing written communication increased productivity <p>May creates problems for:</p> <ul style="list-style-type: none"> business administration (e.g. employee benefits) communication between workers/other businesses <p><u>Job/Housing Balance:</u> Similar to Alternative 3</p>	<p><u>Facility Construction:</u> Similar to Alternative 2</p> <p><u>Demand Management:</u> Same as Alternative 4</p>

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

Evaluation Criteria	1984 RMP Base Year	Adopted RMP	Alternative 1 RMP No-Project Alternative	Alternative 2 Facilities Response	Alternative 3 Facilities Emphasis with Jobs/Housing Balance	Alternative 4 TDM with Balanced Growth	Alternative 5 TDM with Baseline Growth
SOCIAL IMPACTS -- PERSONAL LEVEL							
Changes in Lifestyle	Increasing congestion reduces personal time	<p><u>Job/Housing Balance:</u> Shortened commute for some</p> <p>Increases opportunities for business involvement in civic issues and projects</p> <p><u>Demand Management:</u> Shift in normal work week may:</p> <ul style="list-style-type: none"> alter use of commercial and recreational facilities reduce social contact reduce stress of commuting increase parenting opportunities increase leisure time 	Increased tension due to congestion delays and longer trip times, reduced leisure time	<p>Reduced tension due to fewer delays and shorter trip times compared to No Project</p> <p>May encourage longer home-to-work commute patterns</p>	<p><u>Facility Construction:</u> Tension reduction same as Alternative 2</p> <p><u>Jobs/Housing Balance:</u> Shortened commute for some</p> <p>Increases opportunities for business involvement in civic issues and projects</p>	<p><u>Job/Housing Balance:</u> Same as Alternative 3</p> <p><u>Demand Management:</u> Shift in normal work week may:</p> <ul style="list-style-type: none"> alter use of commercial and recreational facilities reduce social contact reduce stress of commuting increase parenting opportunities increase leisure time <p>Demand management financing mechanisms (e.g. parking costs, tolls) could reduce non-work trips</p>	<p><u>Facility Construction:</u> Same as Alternative 2</p> <p><u>Demand Management:</u> Same as Alternative 4</p>

TABLE 26: COMPARISON OF RMP ALTERNATIVES WITH THE RMP

Evaluation Criteria	1984 RMP Base Year	Adopted RMP	Alternative 1 RMP No-Project Alternative	Alternative 2 Facilities Response	Alternative 3 Facilities Emphasis with Jobs/Housing Balance	Alternative 4 TDM with Balanced Growth	Alternative 5 TDM with Baseline Growth
		Demand management financing mechanisms (e.g. parking costs, tolls) could reduce non- work trips					

- **RMP Alternative 2 - Facility Intensive Response to Growth Trends.** This alternative consisted of the construction of 7,660 lane-miles of freeway improvements region-wide, compared to the construction of 3,097 miles of mixed-flow and HOV lane miles included in the RMP. It included a comparable level of transit corridor development to the RMP (367 miles, verse the RMP's 360 miles), however, this alternatives included a much lower level of TDM effort than the RMP.
- **RMP Alternative 3 - Facility-Intensive Emphasis with Balanced Growth.** This alternative consisted of the construction of 6,043 lane miles of freeway improvements region-wide, compared to the construction of 3,097 miles of mixed-flow and HOV lane miles under the RMP. It included slightly less transit corridor development than RMP Alternative 2 (294 miles, compared to the RMP's 360 miles). Like RMP Alternative 2, it included a much lower level of TDM effort than the RMP. The key difference between RMP Alternative 2 and RMP Alternative 3 was that Alternative 3 included jobs/housing balance strategies.
- **RMP Alternative 4 - Demand Management Emphasis with Balanced Growth.** This alternative included a much lower level of freeway improvement construction region-wide than the RMP (1,858 lane miles compared to 3,097 for the RMP). It included job/housing balance strategies coupled with the same TDM requirements as the RMP and a similar level of transit corridor development (397 miles compared to the RMP's 360 miles). The slightly higher transit corridor development resulted in a slightly higher mode split under this alternative than under the RMP (19.4% compared to the RMP's 19.3%)
- **RMP Alternative 5 -- Demand Management Response to Growth Trends.** Unlike RMP Alternative 4, this alternative did not include jobs/housing balance strategies. It included construction of less freeway improvements than the RMP (2,766 lane miles compared to the RMP's 3,097 lane miles) but more transit corridor development (499 miles compared to the RMP's 360 miles). This mix of improvements resulted in a higher transit mode-split than under the RMP (19.5% compared to the RMP's 19.3%).

Because CMP statute requires that the CMP be consistent with the RMP, the alternatives developed in this EIR must also be consistent with the adopted RMP. Therefore, the proposed CMP and the TDM Intensive and Capital Intensive CMP alternatives are tiered from the adopted

RMP. The proposed CMP and the two program alternatives have been designed to be consistent with the adopted RMP strategy and to contain the five elements required by statute for a CMP. Program alternatives which were not consistent with the adopted RMP have been excluded from the CMP alternative analysis since they do not meet the CMP Statute's RMP consistency requirement and since they were generally felt to represent an inferior strategy based on the previous RMP analysis.

ALTERNATIVES TO CMP

A. NO PROJECT (EXISTING SYSTEM)

This alternative, as the No Project Alternative, presumes that no changes are made to the existing transportation system, and that the existing system must accommodate future travel demand.

Local land use decisions would continue to be made, but the regional highway and transit system would not be able to accommodate the mobility needs of the County.

As discussed in the RMP EIR, congestion on the highway and arterial system would degrade to Level of Service F on most of the system, peak period average vehicle speed would significantly decrease, and as a result, peak period travel would lengthen as people increasingly attempt to avoid congestion.

Potential impacts under this alternative are as follows:

Land Use - This alternative would be inconsistent with the Growth Management Plan (GMP), Regional Mobility Plan (RMP), and the Air Quality Management Plan (AQMP), since funding for projects currently proposed in the RMP to meet regional mobility and air quality goals would not be built. Failure to achieve the RMP could potentially lead to a land use future which is different than the SCAG regional forecast. This is particularly true if the Los Angeles region is the only one of the SCAG counties to fail to adopt a CMP. This alternative would therefore have a significant adverse impact on land use.

Transportation - Congestion on the regional system would degrade to Level of Service F on most of the system, creating in essence a deficient countywide system. As a result, countywide

mobility would be extremely limited. The result is a potentially significant negative impact on the regional system. The resulting impacts would be similar to those of RMP Alternative 1: congestion would increase, transit ridership would drop and on-road fuel consumption would increase significantly (see Table 26).

Air Quality - Under this alternative no CMP actions would be taken which would improve the region's air quality. In addition, those Los Angeles County RMP projects with the potential to improve air quality would not be realized, and facilities based TDM ordinances would not be adopted County-wide by local jurisdictions. Increased congestion on the County's regional system would lead to increased levels of air pollution, as compared to levels obtained with full implementation of the capital projects included in RMP. This could significantly impact the air basin's ability to comply with Clean Air legislation.

Noise - Increased congestion could potentially lead to decreased noise on the regional network and increased traffic on surface streets. No additional highway soundwalls would be built. The potential net result would be increased noise levels in residential neighborhoods and a continued lack of noise mitigation for residential uses located near and predating highways in the County.

Geology - Under this alternative there would be no geological impacts associated with the construction of CMP projects or further impacts associated with RMP construction projects. This alternative could increase or decrease the potential exposure of regional residents to seismic hazards. The change in exposure would depend on the nature of the population redistribution which would result from increased congestion on the County's transportation network.

Water Resources - Under this alternative there would be no water resource impacts associated with the construction of CIP projects or further impacts associated with RMP construction projects. Water quality impacts from automobile sources could result in additional water quality impacts. This alternative could increase or decrease the potential impact on beneficial uses in the region. The change in exposure would depend on the nature of the population redistribution which would result from increased congestion on the County's transportation network.

Biological Resources - Under this alternative potential biological resource impacts associated with the construction of CMP projects or further construction of RMP projects would not occur. However, biological resource impacts could potentially result from a redistribution of the region's

population engendered by the greater levels of traffic congestion, noise and air pollution which would occur in the County under this alternative.

Cultural Resources - The degree of impact of this alternative is difficult to determine. There would be a reduced potential for cultural resource impacts associated with the construction of CMP projects. However, cultural resource impacts could occur as a result of the potential redistribution of the region's population in response to increased congestion in the urbanized portion of the Los Angeles region. To the degree that increase congestion leads to development in previously undeveloped portions of the region, increased archeological resource impacts could result.

Public Services - Under this alternative travel speeds on the regional network would further degrade, further increasing the response times of fire and police services. Under this alternative, local jurisdictions would not be responsible for curing deficiencies on the network. This alternative could thus potentially have less immediate impact on the fiscal resources of local jurisdictions. To the degree that increased congestion reduces the attractiveness of Los Angeles County cities as a potential location for population and employment, the tax base of the area could be eroded.

This alternative would not comply with the requirements of the CMP statute since it does not include the definition of a CMP transportation system, the definition of LOS standards, a TDM element, a land use analysis program, a seven-year capital improvement program, or the adoption of a CMP. This alternative would fail to respond to anticipated growth in the region, and it is thus not considered feasible.

B. NO PROJECT (NO CMP, NO FUTURE STATE FUNDING)

Under this alternative, the CMP would not be adopted. This would directly result in the loss of future Flexible Congestion Relief (FCR) and Traffic Systems Management (TSM) funding. In addition, the federal congestion management requirements now tied to transportation funding would likely not be met, resulting in the loss of those funds as well. The effect of losing these funding sources would be to substantially delay the delivery of transportation capital

improvement projects throughout the County, as local funding sources would be the primary source available for transportation improvements.

The other components of the CMP would not be implemented. This includes the highway and transit Level of Service, network monitoring, the trip reduction ordinance, and the land use analysis program.

Local land use decisions would continue to be made with varying attention to regional transportation impacts and without the benefit of the additional data which would be generated through a CMP monitoring program. The method used to perform land use impact evaluations would continue to vary by jurisdiction.

As a result of the delay in project delivery of planned projects, highway congestion would continue to deteriorate in many parts of the county and the transportation improvements which did occur would be less likely to adequately alleviate severe congestion problems.

Transportation demand management ordinances and policies would be developed individually by each jurisdiction, if at all. This could lead to inconsistent standards and approaches within the region which could, in turn, have an indirect effect on the pattern of land use in the County.

Land Use - In approving the CMP statute, the California Legislature cited fragmented planning among jurisdictions and among modes, which each day results in 400,000 hours lost in traffic, 200 tons of air pollutants, and \$3,100,000 in added costs state-wide to the motoring public. Under this alternative Los Angeles County would contribute to fragmented planning. This alternative would have significant deconcentrating impacts, since development would likely locate on the County's periphery and in adjacent counties where congestion was less. Increased congestion of the system could lead to either increased density in employment areas, or an out migration of population and jobs to nearby counties.

Transportation - Under this alternative, construction of needed transportation improvements would be delayed and the model TDM ordinance would not be adopted by local jurisdictions. This would result in increased congestion on the highway system and less transit availability than with the CMP. This alternative would not help to fulfill the aims of the RMP and would be inconsistent with that document.

Air Quality - Delay in the implementation of transportation measures designed to help implement the AQMP would result in delays in the region's compliance with Clean Air Act standards and non-attainment penalties.

Noise - This alternative would result in delays in the construction of sound walls along highways and increased traffic related noise generation. This would both prolong and increase the exposure of sensitive uses to transportation related noise.

Water Resources - This alternative would have greater operational water quality and less construction water quality impacts than the CMP. Beneficial use impacts would be less than under the CMP.

Biological Resources - Biological resource impacts could potentially result from a redistribution of the region's population less developed areas with intact habitats engendered by the greater levels of traffic congestion, noise and air pollution which would occur in the County under this alternative. Biological resource impacts associated with construction of improvement projects would generally be similar to those of the proposed CMP; construction of facilities could potential result in the destruction of habitat. However impacts would occur somewhat later, and be somewhat less severe since fewer projects would be constructed and they would be constructed later than under the proposed CMP.

Cultural Resources - There would be a reduced potential for cultural resource impacts associated with the construction of transportation facilities under this alternative than under the proposed CMP. However, cultural resource impacts could occur as a result of the potential redistribution of the region's population in response to increased congestion in the urbanized portion of the Los Angeles region. To the degree that increase congestion lead to development in previously undeveloped portions of the region, increased archeological resource impacts could result.

Public Services - Impacts would be generally as described under Alternative A, however they would occur somewhat later, and be somewhat less severe since funding would not be lost until the next funding cycle.

This alternative would not comply with the requirements of the CMP statute since it does not include the definition of a CMP transportation system, the definition of LOS standards, a TDM element, a land use analysis program, a seven-year capital improvement program, or the adoption of a CMP. This alternative would fail to fulfill the aims of the RMP and would be inconsistent with that document. It is therefore considered not feasible.

C. TDM INTENSIVE

This alternative would be based on an intensive performance based TDM program approach to congestion management. The program would be aimed at achieving the Regional Mobility Plan's TDM goal of a 30% reduction in auto-based home-work trips. Of the trips remaining on the system, there would be and a 22.4% carpool/vanpool share a 19.4 percent transit mode share. Since the overall CMP must still be implemented within the same limited resources, the additional TDM effort would largely reduce the CIP component of the program. The CMP LOS standards, networks and land use analysis program would be the same as for the proposed CMP.

Potential impacts under this alternative are as follows:

Land Use - The intensive TDM program would be consistent with long-range RMP TDM goals. However, the alternative as a whole would be inconsistent with the RMP since it would not include the balance of the capital improvement projects and modal strategies assumed in the RMP and therefore not achieve mobility goals. Implementation of this alternative would result in minimal capital improvements in the Los Angeles region. There is also great uncertainty regarding the actions required to achieve these TDM goals. Stringent controls on new development (such as mandatory trip reductions as a condition of approval) could deter such development, and preclude the creation of transportation beneficial land uses and densities. Certain TDM measures such as market pricing mechanisms, could also have activity relocation/deconcentration inducing effects.

The RMP TDM program includes a major ride share program, a telework center program, and a flex-time work program that is projected by SCAG to result in a 30 percent reduction in home-to-work trips and a 22.4% carpool/vanpool share by 2010. The RMP EIR also projects a 19.4 percent mode share by transit for all home-to-work trips by 2010. However, there is a potential

for population and employment redistribution, should the Los Angeles region be the only county in the region to adopt stricter TDM requirements.

Transportation - Increased TDM should have a beneficial impact on the network by reducing drive-alone auto trips and increasing ridesharing and transit use. However, without implementation of all of the capital improvement projects included in the RMP, congestion on the transportation system would continue to degrade. Implementation of this degree of TDM would not be sufficient to maintain mobility or LOS standards. Overall, this alternative would have a negative impact on the transportation system, when compared to the proposed CMP.

Air Quality - This alternative would be inconsistent with the RMP and thus with the AQMP. It would thus result in negative air quality impacts compared to the proposed CMP due to increased trip distances and related emissions. Capital projects anticipated in the air plan would also not be implemented exacerbating emissions due to traffic congestion.

Noise - In general this alternative would result in a reduction in short-term construction related noise compared to the proposed CMP.

Geology - This alternative could result in fewer capital improvement projects and associated geologic benefits and adverse impacts. At a program level, no significant difference in geologic impacts is anticipated.

Water Resources - This alternative would potentially result in fewer capital improvement projects and associated water resource impacts.

Biological Resources - This alternative would result in less direct biological resource impacts. The degree and nature of indirect impacts would depend on the land use consequences of failing to maintain levels of service in the County.

Cultural Resources - This alternative would result in less direct cultural resource impacts. The degree and nature of indirect impacts would depend on the land use consequences of failing to maintain levels of service in the County.

Public Services - Since this alternative would not result in the maintenance of levels of service on the highway network, police and fire response times would continue to degrade.

This alternative is considered inferior to the proposed CMP since: (1) it would not include the balance of capital improvement projects included in the RMP and would therefore not achieve RMP mobility goals; (2) there is great uncertainty regarding the actions required to achieve this level of TDM; (3) stringent controls on new development could deter such development and preclude the creation of transportation beneficial land uses and densities; (4) congestion on the transportation system would continue to degrade under this alternative; and (5) this alternative would have negative air quality impacts when compared to the proposed CMP.

D. **CAPITAL INTENSIVE**

Under this alternative a capital-intensive approach to maintaining mobility would be taken. This alternative proposes to accelerate much of the capital component of the RMP into the seven year CIP. This component would also include no additional TDM efforts above existing levels. The network, LOS and land use analysis components of the alternative would be the same as for the proposed CMP.

Land Use - This alternative would have similar land use impacts as the project. It would have the same potential to create sprawl and increase density near transit centers. Increased capital projects would require additional right of way with greater need to displace existing land uses.

Transportation - It is possible to view this alternative in the context of two of the alternatives to the RMP described above, Alternative 2 - the Facility-Intensive Response to Growth Trends and Alternative 3 - the Facility-Intensive Emphasis with Balanced Growth. Both alternatives would result in additional highway system improvements that would lead to improved system performance on a regional level. Both would have negative local impacts. However, these improvements have related increases in capital costs which cannot be overcome by switching TDM dollars to capital projects. The subsequent imbalance of TDM and capital projects will result in an inability to maintain CMP LOS standards.

Air Quality - It is questionable whether this alternative would be found consistent with the RMP and AQMP since this alternative does not contain an appropriate balance of TCMs that have been found necessary to attain air quality goals.

Noise - More capital projects would create greater potential for construction related and localized noise impacts. At a program level, no significant noise impacts are anticipated to result from this alternative.

Geology - Construction associated geologic impacts would increase with a more capital intensive approach.

Water Resources - The potential for impacts to beneficial water uses is generally greater with a more capital intensive approach.

Biological Resources - The construction of additional capital projects could potentially put additional biological resources at risk.

Cultural Resources - The construction of additional capital projects could potentially put additional cultural resources at risk.

Public Services - Increased network system performance associated with more capital improvement projects would further reduce travel times for police and fire services, creating additional beneficial impacts. However, to the degree that the additional costs associated with additional capital improvement projects would be borne by local jurisdictions, local public service provision could be impacted.

This alternative is considered inferior to the proposed project because: (1) this alternative would result in increased capital costs beyond existing sources; (2) the imbalance between TDM and capital projects inherent in this approach fall short in attaining CMP LOS standards; (3) it is questionable whether this alternative would be found consistent with the RMP and AQMP since this alternative does not contain an appropriate balance of TCM's that have been found necessary to attain air quality goals and (4) there is a greater potential for CIP related noise, geology, water resource, biological resource, and cultural resource related impacts.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

After mitigation, no significant adverse program level impacts are anticipated to result from implementation of the CMP. All impacts would be CIP project specific.

The California Environmental Quality Act (CEQA) requires that an environmentally superior alternative be identified. The TDM Intensive Alternative is environmentally superior to the No Project Alternatives (Alternative A and B) because it complies with statute and lessens air quality and congestion related impacts. The TDM Intensive Alternative is environmentally superior to the Capital Intensive Alternative because it would not have the degree of CIP project level impacts.

Amended - See
ERRATA Notes

Although the TDM Intensive Alternative is environmentally superior to the other alternatives, it is not superior to the proposed CMP. This alternative would result in potentially more land use, transportation, air quality and public services impacts than the proposed CMP. Because this alternative minimizes capital improvement projects, it would reduce the project specific CIP related impacts of the proposed CMP. For this same reason, it would have fewer noise, geological, water resources and cultural resource impacts than the proposed CMP. The TDM Intensive Alternative, however, still falls short of regional mobility goals and air quality goals. It is inferior to the proposed CMP because: (1) it would not include the balance of capital improvement projects included in the RMP and would therefore not achieve RMP mobility goals; (2) there is great uncertainty regarding the actions required to achieve this level of TDM; (3) stringent controls on new development could deter such development and preclude the creation of transportation beneficial land uses and densities; (4) congestion on the transportation system would continue to degrade under this alternative; and (5) this alternative would have negative air quality impacts when compared to the proposed CMP. Therefore, the CMP project is environmentally superior to each of the project alternatives.

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This report was prepared for the Los Angeles County Transportation Commission by Environmental Science Associates, Inc. (ESA). Wendy Lockwood, Director, was the Associate-In-Charge; Susan O'Carroll, Ph.D was the Project Manager.

The transportation analysis contained in this report was prepared by Kaku Associates. Dick Kaku was the project supervisor and Tom Gaul was the Project Manager.

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APPENDIX A

LIST OF ACRONYMS

ARB	Air Resource Board
BMM	Best Mitigation Measures
BMP	Urban Water Conservation Best Management Practices
Cal State Northridge	California State University at Northridge
CAP	Central Arizona Project
CCCA	California Clean Air Act
CEQA	California Environmental Quality Act
CHP	California Highway Patrol
CIP	Capital Improvement Program
CMA	Congestion Management Agency
CMP	Congestion Management Program
CO	Carbon Monoxide
CRWQCB	California Regional Water Control Boards
DWP	Department of Water and Power
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
FCR	Flexible Congestion Relief
GMP	SCAG's Growth Management Plan
HOV	High Occupancy Vehicle
IGR	Intergovernmental Review Program
LACTC	Los Angeles County Transportation Commission
LOS	Level of Service Standards
NO	Nitric Oxide
NOP	Notice of Preparation
NOX	Nitrogen Dioxide
PM10	Suspended Particulates
ppm	parts per million
RMP	Regional Mobility Plan (prepared by SCAG).
ROG	Reactive Organic Gases
RTIP	Regional Transportation Improvement Program
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SEA	Significant Ecological Area
SLORCB	State Water Resources Control Board
SMM	SCAQMD Standard Mitigation Measures
SOPA	Society of Professional Archaeologists
SOX	Sulfur Dioxide
STIP	State Transportation Improvement Program
SWP	State Water Project
SWRCB	State Water Resources Control Board
TCM's	Transportation Control Measures
TDM	Transportation Demand Management

TOG	Total Organic Gases
TSM	Traffic System Management
TSP	Total Suspended Particulates
UCLA	University of California at Los Angeles
VMT	Vehicle Mile Traveled
VT	Vehicle Trips



THE LOS ANGELES COUNTY TRANSPORTATION COMMISSION

CALIFORNIA ENVIRONMENTAL QUALITY ACT

REVISED NOTICE OF PREPARATION AND INITIAL STUDY

RECEIVED

TO: All Interested Agencies, Organizations, Parties and Persons

FROM: The Los Angeles County Transportation Commission

SUBJECT: Revised Notice of Preparation of a Draft Environmental Impact Report and Initial Study.

PROJECT: The Congestion Management Program for Los Angeles County

JUN - 8 1992

ENVIRONMENTAL SCIENCE ASSOC.
LOS ANGELES

In December of 1991, a Notice of Preparation and Initial Study for the Congestion Management Program for Los Angeles County were issued by the Los Angeles County Transportation Commission (Commission). Since that time, modifications have been made to the Program. For this reason the Commission is issuing a Revised Notice of Preparation and Revised Initial Study describing the program modifications and reassessing the potential for the Program to create significant environmental impacts.

The Los Angeles County Transportation Commission will be the Lead Agency and will prepare the Environmental Impact Report for the Congestion Management Program for Los Angeles County. We need to know the views of agencies regarding specifically those aspects of the scope and content of the Environmental Impact Report which are germane to the agency's statutory responsibilities in connection with the proposed project. We would also welcome comments from concerned organizations, parties and persons specifically regarding aspects of the scope and content of the Environmental Impact Report which are felt to be of concern. General comments on the Congestion Management Program should be sent separately and separately labeled.

Due to the time limits of State law, your response must be sent at the earliest possible date, but not later than July 10, 1992. Please send your response to Kendra Morries, Project Manager, Congestion Management Program at 818 West Seventh Street-2200, Los Angeles, CA 90017. Please include the name of a contact person.

A description of the proposed Congestion Management Program and the potential environmental effects of the proposed program are contained in the attached Revised Initial Study. A copy of the Final Draft



Page 2
Notice of Preparation

of the Congestion Management Program for Los Angeles County (CMP) is available upon request by calling the CMP Hotline at 213-244-6599. Information about on-going CMP related meetings and work progress is also available by calling the Hotline.

DATE: 6/4/92

Juanita Wilson for
Neil Peterson

Jessey
Executive Director
Title

213-623-1194
Telephone

REVISED INITIAL STUDY
CONGESTION MANAGEMENT PROGRAM

1. Name of Proponent: Los Angeles County Transportation Commission
2. Address and Phone Number of Proponent: 818 West Seventh Street- 2200, Angeles California, 90017
3. Contact Person: Kendra Morries, Project Manager, Congestion Management Program
4. Name of Proposal: Congestion Management Program for Los Angeles County

I. INTRODUCTION

On December 12, 1991 the Los Angeles County Transportation Commission (LACTC) issued a Notice of Preparation (NOP) of Environmental Impact Report (EIR) for the Congestion Management Program (CMP) for the County of Los Angeles. Since that time, the project has been revised. For this reason, the LACTC has chosen to issue a revised NOP and prepare a revised Initial Study for the project.

The project consists of the implementation of the Congestion Management Program (CMP) for the County of Los Angeles. This Initial Study identifies the project's potential to create significant environmental impacts. The initial study is organized in five sections:

- I. Introduction
- II. Revised Project Description
- III. Relationship to Future and Past Environmental Review
- IV. Summary of Potential Environmental Effects
- V. Determination

The CMP is a new program mandated by State Government Code Sections 65088, et. seq., adopted in June of 1990. The intent of the program is to provide a mechanism for maintaining mobility on the regional transportation network while being sensitive to air quality goals. By statute, LACTC was given a one year extension to adopt it's CMP, because it was determined that an Environmental Impact Report was necessary. In accordance with this extension the LACTC must adopt its CMP by December 1, 1992. The CMP must be adopted by this date to ensure that the projects approved for the County of Los Angeles by the State in the 1992 State

Transportation Improvement Program remain eligible for funding, and that local subventions that are available to local jurisdictions continue to flow.

The CMP will be administered by the Los Angeles County Transportation Commission (LACTC) which is the lead agency for the project. However, local jurisdictions, transit operators, the South Coast Air Quality Management District (SCAQMD), the Southern California Association of Governments (SCAG), and Caltrans all have roles and responsibilities regarding implementation of the program.

As discussed more fully in Section II. - Explanation of the Revised Project Description, the CMP program previously described consisted of five components:

- 1) The definition of the regional transportation network and the minimum Level of Service (LOS) performance standards for the highway segments and roadway intersections which make up the system.
- 2) Specification of transit standards for frequency and routing of transit service and coordination between transit operators.
- 3) A trip reduction and travel demand management (TDM) element promoting alternative transportation methods during peak travel periods.
- 4) A program to analyze the impact of local land use decisions on the regional transportation system, including the preparation of Deficiency Plans and the development of a County-wide nexus development fee.
- 5) A seven-year capital improvement program that includes projects proposed for funding through the State Flexible Congestion Relief or Traffic System Management program.

Since publication of the Draft CMP and issuance of the original NOP for the program, two significant things have happened: component three, the TDM element, has been further refined; and component four has been significantly altered.

At the direction of the LACTC Commission, the CMP will not include a mitigation fee. The CMP staff is currently engaged in a planning and feasibility study regarding various approaches to address future congestion on the CMP system. This study will form the basis of a deficiency plan approach which is expected to be included in the 1993 CMP update scheduled for adoption in November of 1993. It is important to note that statute does not require the adoption of a deficiency plan process coincident with the adoption of the CMP. Additional environmental review will be undertaken to analyze the potential environmental impacts associated with whatever deficiency plan process is incorporated into the 1993 CMP. Approaches currently under study in the planning and feasibility study include: additional highway, transit and roadway improvements; a more aggressive Transportation Demand Management Ordinance (possibly

including the use of market incentives/congestion pricing mechanisms); and alternative land use scenarios.

As discussed in greater detail in Section III - Relationship to Future and Past Environmental Review, the proposed program is designed to be consistent with the Regional Mobility Plan (RMP) administered by SCAG. The RMP has undergone prior environmental review. It is the intent of the LACTC to tier the environmental analysis of the CMP off the Environmental Impact Report (EIR) for the Regional Mobility Plan.

Tiering is a procedure where broad EIRs (such as those for general plans or policy statements such as the RMP) are followed by the preparation of either narrower EIRs for related plans or programs of lesser scope and/or site-specific EIRs. When tiering is used the subsequent EIRs incorporate by reference the general discussions contained in the earlier, broader EIR and concentrate solely on the issues specific to the project for which the subsequent EIR is being prepared.¹ The Legislature specifically encourages the tiering of EIRs under the California Environmental Quality Act (CEQA) in order to provide increased efficiency in the CEQA process.

The purpose of the Initial Study for a tiered EIR is to help decide whether, and to what extent, the prior EIR is still sufficient for the present project and to determine whether the project may cause any significant impacts not analyzed in the prior EIR.² That is the purpose of this Initial Study and the discussion contained in Section IV - Summary of Potential Environmental Effects.

This Initial Study and the subsequent program level EIR which will be prepared for the CMP will look at the potential of the project to create environmental impacts. One component of the CMP is a seven-year capital improvement strategy consisting of site-specific projects eligible for funding under the State Flexible Congestion Relief or Traffic System Management programs. These site-specific projects will receive subsequent environmental review, as needed, in a manner consistent with CEQA requirements, and the tiering concept.

II. REVISED PROJECT DESCRIPTION

This section of the Initial Study briefly describes the key components of the proposed CMP and changes in the proposed program which have occurred since publication of the Final Draft Congestion Management Program for Los Angeles County, in August of 1991.

The CMP is intended to help ensure that acceptable levels of regional mobility are maintained, effective use of all transportation modes is achieved, new transportation solutions are developed, air quality is improved, and local jurisdictions, as required by CEQA, fully examine the impact

¹CEQA Guidelines (Cal. Code of Regulations, Title 14) section 15385.

²CEQA Guidelines section 15152.

of their land use decisions on the regional transportation system. The following is a description of the key elements of the CMP:

CMP Highway and Roadway System Element - As part of the CMP, the LACTC has defined a set of highways and roadways which will be monitored to insure that acceptable levels of regional highway mobility are maintained. The Final Draft CMP documents the rationale for selecting specific highways and roadways included in the network as well as the Level of Service Standards, monitoring guidelines, responsibility assignments, and assessment and impact methodology. There have been limited changes in the defined highway network since publication of the Final Draft CMP. Figure 1 shows the CMP network as currently defined.

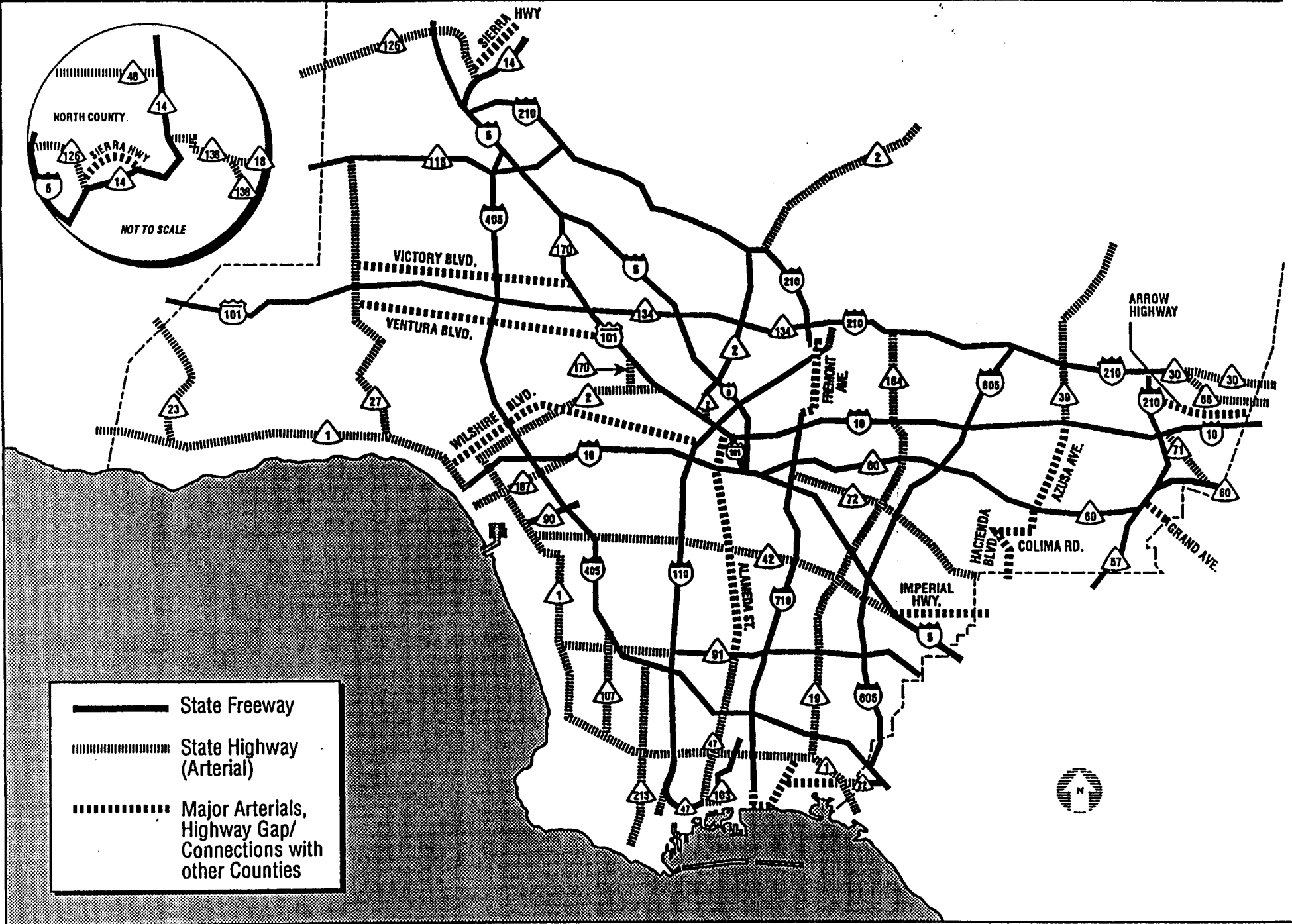
CMP Transit Element - The CMP Transit Element establishes a regional transit monitoring network and establishes standards for frequency, routing, and coordination of regional transit services. The purpose of the transit monitoring network is to gauge the effectiveness of transit in relieving traffic congestion in travel corridors of regional significance. Transit monitoring efforts are intended to provide important information on the routing, frequency, capacity and time competitiveness of existing services relative to the automobile. The transit monitoring network is also intended to serve as a planning tool which will facilitate identification of potential gaps in the current transit system, as well as opportunities to make transit a more effective traffic mitigation strategy. This section of the CMP also discusses project funding procedures for insuring that transit impacts and transit mitigation measures are addressed through the local development process. No changes have been made in this component since publication of the Final Draft CMP.

Transportation Demand Management (TDM) Element - As required by statute, the CMP includes a trip reduction and travel demand element aimed at promoting alternative transportation methods. The CMP contains a description of existing TDM programs. Since each local jurisdiction is responsible for adopting and implementing a trip reduction and travel demand ordinance, the focus of the TDM Element is to identify a sample TDM ordinance with minimum TDM standards identified. The LACTC has refined the sample TDM ordinance since publication of the Final Draft CMP. A copy of the revised ordinance is available upon request from the LACTC.

Transportation Impact Analysis Program - This element of the CMP defines a mechanism for insuring that the impacts of local development projects on the CMP networks are analyzed. In lieu of the transportation impact analysis program and regional fee described in the Final Draft CMP, the CMP will include a requirement that local jurisdictions, under existing CEQA requirements analyze the regional transportation impacts of a development project in the project's EIR.

Capital Improvement Program Element - As required by statute, the CMP includes a seven year Capital Improvement Program (CIP) to maintain or improve the Level of Service on the CMP highway system, transit performance, and to mitigate regional transportation impacts

CMP ROADWAY SYSTEM



GMP ROADWAY SYSTEM

State Route	Freeway/Arterial Name
1	Pacific Coast Highway, Palisades Beach Road, Lincoln Boulevard, Sepulveda Boulevard
2	Lincoln Boulevard, Santa Monica Boulevard, Alvarado Street, Glendale Boulevard, GLENDALE FREEWAY, Angeles Crest Highway
5	SANTA ANA FREEWAY, GOLDEN STATE FREEWAY
10	SANTA MONICA FREEWAY, SAN BERNARDINO FREEWAY
14	ANTELOPE VALLEY FREEWAY
18	Pearblossom Highway
19/164	Lakewood Boulevard, Rosemead Boulevard
22	7th Street, GARDEN GROVE FREEWAY
23	Decker Canyon Road
27	Topanga Canyon Boulevard
30	FOOTHILL FREEWAY, Baseline Road, Williams Avenue, College Way
39	Azusa Avenue, San Gabriel Canyon Road
42/105	Manchester Boulevard, Firestone Boulevard
47	Vincent Thomas Bridge, Henry Ford Avenue, Alameda Street
48	Neenach Road, Avenue D
57	ORANGE FREEWAY
60	POMONA FREEWAY
66	Foothill Boulevard
71	Corona Expressway
72	Whittier Boulevard
90	Marine Expressway, MARINA FREEWAY
91	Artesia Boulevard, GARDENA FREEWAY, ARTESIA FREEWAY
101	SANTA ANA FREEWAY (SPUR), HOLLYWOOD FREEWAY, VENTURA FREEWAY
103	TERMINAL ISLAND FREEWAY
107	Hawthorne Boulevard
110	Gaffey Street, HARBOR FREEWAY, PASADENA FREEWAY, Arroyo Parkway
118	SIMI VALLEY FREEWAY, SAN FERNANDO VALLEY FREEWAY
126	Henry Mayo Drive, Magio Mountain Parkway, San Fernando Road

State Route	Freeway/Arterial Name
134	VENTURA FREEWAY
138	Neenach Road, Palmdale Boulevard, 47th Street East, Fort Tejon Road, Pearblossom Highway, Antelope Highway
170	Highland Avenue, HOLLYWOOD FREEWAY
187	Venice Boulevard
210	FOOTHILL FREEWAY
213	Western Avenue
405	SAN DIEGO FREEWAY
605	SAN GABRIEL RIVER FREEWAY
710	LONG BEACH FREEWAY, Pasadena Avenue, St. John Avenue

HIGHWAY GAPS/CONNECTORS WITH OTHER COUNTIES

Street	Limits
Arrow Highway	Route 210 to San Bernardino County
Azusa Avenue	Collma Road to Route 10
Collma Road	Hacienda Boulevard to Azusa Avenue
Fremont Avenue	Valley Boulevard to Columbia Street
Grand Avenue	Route 57 to San Bernardino County
Hacienda Boulevard	Orange County to Collma Road
Imperial Highway	Route 5 to Orange County
Valley Boulevard	Route 710 to Fremont Avenue

MAJOR ARTERIALS

Street	Limits
Alameda Street	Port of Los Angeles to Route 101
Alamitos Avenue	Ocean Boulevard to Pacific Coast Highway
Seventh Street	Alamitos Avenue to Pacific Coast Highway
Sierra Highway	Route 128 to Route 14 (at Red Rover Mine Road)
Shoreline Drive	Route 710 to Ocean Boulevard
Ventura Boulevard	Topanga Canyon Boulevard to Lankershim Boulevard
Victory Boulevard	Topanga Canyon Boulevard to Route 170
Wilshire Boulevard	Ocean Boulevard to Route 110

identified through the CMP land use analysis program. The CIP includes a list of specific improvements proposed for the regional system.

State programming statutes require that projects competing for State Flexible Congestion Relief (FCR) or Traffic System Management (TSM) funds be included in the CMP in order to be eligible for State funding approval. Projects included in the 1992 CMP CIP are consistent with the existing Regional Mobility Plan.

III. RELATIONSHIP TO FUTURE AND PAST ENVIRONMENTAL REVIEW

The CMP is required by law to be consistent with the RMP prepared by SCAG. The RMP includes transportation demand management strategies, transportation system management strategies, mixed-flow facilities, high-occupancy vehicle facilities, a transit and inter-city rail program, non-motorized transportation strategies and financial strategies for accomplishing the plan. Improvement projects included in the CMP must be consistent with the RMP or SCAG may withhold them from inclusion into the Regional Transportation Improvement Program.

An Environmental Impact Report for the current RMP was prepared in 1988. The CMP EIR will be tiered from the current RMP EIR.

The individual improvement projects included in, or made necessary by, the CMP will be subject to CEQA environmental review requirements, as appropriate. The CMP EIR will serve as a program level EIR from which these project level environmental assessments may be tiered.

The land use analysis requirement contained in the CMP will help to ensure that local jurisdictions consider the regional transportation impacts of new development as part of their land use approval process. This will help ensure that private and public projects are better able to comply with the CEQA requirement to consider the potential regional impacts of a project as part of the environmental analysis of potential project impacts.

IV. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

The focus of the 1992 CMP is establishing a process for the evaluation and implementation of projects, programs, and activities that reduce congestion on the CMP highway system.

The definition of the CMP highway network and level of service standards may affect the selection of projects, programs, and activities that could create environmental impacts. One of the primary objectives of the Congestion Management Program is to maintain level of service standards on the CMP system through a multi-modal transportation analysis, and by local jurisdictions in assessing the impact of new development on the CMP highway system. Future projects, programs, and actions will revolve around how to maintain this countywide system.

Similarly, transit performance standards have been developed to measure and maintain regional transit capacity in broad congested corridors. Data collected through this process will assist in

identifying effective regional transit services for future planning decisions. Such future improvements could serve to minimize environmental impacts while enhancing mobility on the regional transportation system. The need for further transit improvements is clearly indicated in the Regional Mobility Plan.

The Transportation Demand Management Element of the CMP includes a sample "Phase I" TDM Ordinance to assist local agencies in developing local TDM Ordinances that will meet minimum local compliance requirements of the CMP program. The sample TDM Ordinance was developed to focus on facility friendly design standards for new development. Such standards encourage building design features that ease access to transit and car/van pools. Facility design standards are distinct from, by compliment employer directed requirements of the SCAQMD's Regulation XV. Such standards are likely to mitigate increase trip generation, and work toward the demand management goals of the Regional Mobility Plan.

The final component with the potential to create environmental impacts is the Capital Improvement Program. The Capital Improvement Program will consist of those projects that have already been approved for State funding in the 1992 State Transportation Improvement Program. These projects have already been reviewed for environmental impacts and air quality conformity with the 1989 Regional Mobility Plan. However, because the RMP EIR is approximately five years old, some to the setting information may require updating. The checklist given below identifies the potential impacts associated with the CMP. These are the impacts to be addressed in the CMP EIR.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
1.	<u>Earth</u>			
	Will the proposal result in:			
a.	Unstable earth conditions or changes in geologic substructures?	—	—	<u>X</u>
b.	Disruptions, displacements, compaction or overcovering of the soil?	—	<u>X</u>	—
c.	Changes in topography or ground surface relief features?	—	<u>X</u>	—
d.	The destruction, covering or modification of any unique geologic or physical features?	—	<u>X</u>	—

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
1.	<u>Earth</u>	Will the proposal result in:		
	e. (continued)		<u>X</u>	—
		Any increase in wind or water erosion of soils, either on or off the site?		
	f.	—	<u>X</u>	—
		Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?		
	g.	—	<u>X</u>	—
		Exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure or similar hazards?		

The EIR for the RMP contains a discussion of possible landslide, soil stability, erosion, subsidence, seismic, and liquefaction related impacts associated with the RMP. That EIR concludes that, at a program level, the impacts of RMP projects would be potentially significant on a regional level when they would result in opening up access to new areas with major geologic hazards, or when the combined effects of a number of projects result in placing people and structures at risk.³ The RMP EIR identifies geological and seismic impacts as unavoidable significant adverse impacts of the RMP, since after mitigation transportation facilities would continue to be exposed to potential hazards from seismic risks, erosion and slope failure.⁴ The RMP's analysis of potential regional impacts holds true for the CMP which includes a list of capital improvements which would result in the construction of new structures subject to the region's seismic activity.

The RMP EIR discusses the potential for earth related impacts to occur on a project level and concludes that the degree of impact is dependent on the location of specific projects. This is true

³Draft RMP EIR page 63. The Final EIR for the RMP consists of the Draft EIR, the Technical Appendices and a Response To Comments document.

⁴Draft RMP EIR page 153.

for the CMP as well. The construction of individual CMP related capital improvement projects is likely to result in the grading and overcovering of soil. This could potentially result in increased wind or water erosion of soils. Improvement projects located near or on the coast, rivers, or slopes could result in the alteration of unique geologic or physical features or stream or river channels. The RMP EIR states that mitigation measures would need to be developed for individual projects and incorporated in project design and suggests possible mitigations for incorporation.⁵ These mitigations would be applied to CMP projects as part of the tiering of the CMP EIR on the RMP EIR. No earth related impacts are expected to result from the non-capital components of the CMP.

Individual capital projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. Additional project specific mitigations may be identified, as needed, to mitigate significant project impacts, as part of any necessary subsequent project level environmental assessments.

The CMP EIR will contain an updated geology and seismicity setting section, and a summary of the RMP EIR geology and seismicity discussion. Where possible, CMP capital projects with the potential to create earth impacts will be identified.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
2.	<u>Air:</u> Will the proposal result in:			
a.	Substantial air emissions or deterioration of ambient air quality?	—	<u>X</u>	—
b.	The creation of objectionable odors?	—	—	<u>X</u>
c.	Alteration of air movement, moisture or temperature, or any change in climate, either locally or regionally?	—	—	<u>X</u>
d.	Emission of hazardous air pollutants within one-fourth of a mile of a school?	—	<u>X</u>	—

⁵Draft RMP EIR pages 65-66.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
2.	<u>Air:</u>	Will the proposal result in:		
	e. (continued)	—	—	<u>X</u>
		Burning of municipal wastes, hazardous waste or refuse-derived fuel and consists of either the construction of a new facility or the expansion of an existing facility by more than 10 percent?		

Mobile source emissions have a major impact on air quality in the South Coast Basin. Key factors affecting emission levels include the vehicle mix, level of transit use, the number of vehicle miles traveled, the nature of transportation system improvements, and the level of transportation system congestion. Land use patterns, population and trip making behavior all contribute to the number of vehicle miles traveled. Many of these factors are inter-related. Capital improvements might result in both regional and localized air quality impacts. Depending on the location of specific improvements, localized impacts could potentially occur within one-fourth mile of a school. Regional impacts are anticipated to be beneficial since the CMP has been developed to be consistent with the RMP and with the goal of improving air quality. The air quality impacts of CIP projects included in the 1992 RMP have been analyzed for conformance with the Air Quality Management Plan as part of the development of the Regional Transportation Improvement Program (RTIP) submitted to the State as the region's STIP request.

No objectional odors, other than those associated with vehicle emissions are anticipated to result from the CMP. The CMP does not involve the burning of waste materials. No climatic changes are anticipated as a result of the CMP.

The CMP EIR will contain an updated air quality setting section and a general discussion of the CMP's potential to create both localized and regional environmental impacts.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
3.	<u>Water:</u>	Will the proposal result in:		
	a.	—	<u>X</u>	—
		Changes in currents, or the course or direction of water movements, in either marine or fresh waters?		

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
3.	<u>Water:</u>			
	Will the proposal result in:			
b. (continued)	Changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff?	—	<u>X</u>	—
c.	Alterations to the course or flow of flood waters?	—	<u>X</u>	—
d.	Change in the amount of surface water in any water body?	—	<u>X</u>	—
e.	Discharge into surface waters, or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen or turbidity?	—	<u>X</u>	—
f.	Alteration of the direction or rate of flow of ground waters?	—	<u>X</u>	—
g.	Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?	—	<u>X</u>	—
h.	Substantial reduction in the amount of water otherwise available for public water supplies?	—	—	<u>X</u>
i.	Exposure of people or property to water related hazards such as flooding or tidal waves?	—	—	<u>X</u>
j.	Significant changes in the temperature, flow or chemical content of surface thermal springs?	—	—	<u>X</u>

The RMP EIR includes a discussion of both how classes of RMP projects, and specific RMP projects, would affect water resources and water quality. The classes of RMP projects discussed in the RMP EIR are TDM, TSM, mixed-flow facilities, transit facilities, and non-motorized transportation. The RMP EIR does not include a discussion of recent water conservation ordinances or existing drought conditions as part of its discussion of water resources.

The RMP EIR indicates that project-level environmental assessments of individual projects in the RMP should consider mitigation measures to reduce water resource impacts. It identifies measures which should be included at the project level.⁶ The RMP EIR concludes that with proper facility alignment, design, and construction practices, most regionally significant impacts on water resources could be averted, and that the RMP would not result in regionally significant adverse impacts.⁷

The construction of individual capital improvement projects included in the Capital Improvement Program may result in the grading and overcovering of soil. This could potentially result in changes in absorption rates, drainage patterns and the amount of surface water runoff. This could in turn result in changes in flood water flow and the discharge of flood waters into surface waters. Increased flood water flows associated with the CMP are not anticipated to be sufficient to increase flood hazard risks. Improvement projects located near or on the coast or rivers or which result in the interception of an aquifer could potentially result in changes in water movements. No significant increase in water demand is anticipated to result from capital improvements.

The CMP EIR water resource section will contain an update of the RMP setting discussion, a discussion of the potential impacts associated with classes of CMP CIP projects, and an analysis of specific CMP CIP projects with the potential to have significant impacts. If possible, additional project-level mitigations, beyond those identified in the RMP EIR, will be specified. Individual projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. Additional project specific mitigations may be identified, as needed to mitigate significant project impacts, as part of any necessary subsequent environmental review.

⁶Draft RMP EIR pages 84-85.

⁷Draft RMP EIR page 154.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
4.	<u>Plant Life:</u> Will the proposal result in:			
a.	Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, microflora and aquatic plants)?	—	<u>X</u>	—
b.	Reduction of the numbers of any unique, rare or endangered species of plants?	—	<u>X</u>	—
c.	Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?	—	<u>X</u>	—
d.	Reduction in acreage of any agricultural crop?	—	<u>X</u>	—

The RMP EIR contains a discussion of major plant communities in the region and identified the location of areas containing rare or endangered species and areas of ecological significance. That EIR concludes that any impacts to biological resources associated with the RMP will come from facilities construction.⁸ It further concludes that although the majority of proposed facilities and facilities improvements would be located in already developed areas with few biological resources to be affected, that the RMP does contain several highway construction projects that would result in the loss of regionally significant amounts of terrestrial habitat or pose a significant risk to rare or endangered species or areas of ecological significance.⁹ This would be true of individual CMP CIP projects as well; large capital improvement construction projects, depending on their location, could result in the loss of a significant amount of terrestrial habitat. Construction of capital improvement projects, if located in areas containing endangered species could result in reductions in the population of such species. Plantings associated with capital improvement projects could potentially introduce new species into an area.

⁸Draft RMP EIR page 70.

⁹Draft RMP EIR page 151.

The RMP EIR indicates that project-level assessments of individual projects in the RMP should consider specific mitigation measures to reduce significant biological impacts, and identifies mitigations to be included in project design.¹⁰

The CMP EIR biological resource section will contain an update of the RMP EIR setting discussion, if necessary, and include an analysis of specific CMP CIP projects with the potential to have significant impacts. Where possible, additional project-level mitigations, beyond those identified in the RMP EIR will be specified.

Individual projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. Additional project specific mitigations may be identified, as needed to mitigate significant project impacts, as part of any necessary subsequent environmental review.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
5.	<u>Animal Life:</u> Will the proposal result in:			
a.	Change in the diversity of species, or numbers of any species of animals (birds, land animals including reptiles, fish and shellfish, benthic organisms or insects)?	—	<u>X</u>	—
b.	Reduction of the numbers of any unique, rare or endangered species?	—	<u>X</u>	—
c.	Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?	—	<u>X</u>	—
d.	Deterioration to existing fish or wildlife habitat?	—	<u>X</u>	—

The RMP EIR contains a discussion of major animal communities in the region and identifies the location of areas containing rare or endangered species and areas of ecological significance. That EIR concludes that any impacts to biological resources associated with the RMP will come

¹⁰Draft RMP EIR page 72.

from facilities construction.¹¹ It further concludes that although the majority of proposed facilities and facilities improvements would be located in already developed areas with few biological resources to be affected, that the RMP does contain several highway construction projects that would result in the loss of regionally significant amounts of terrestrial habitat or pose a significant risk to rare or endangered species or areas of ecological significance.¹² This could be true of individual CMP CIP projects as well; large capital improvement construction projects, depending on their location, could result in the loss of a significant amount of terrestrial habitat. Construction of capital improvement projects, if located in areas containing endangered species could result in reductions in the population of such species. The CMP will not result in the introduction of any new animal species. Highway and rail construction projects could potentially create a barrier, inhibiting the movement of animals.

The RMP EIR indicates that project-level assessments of individual projects in the RMP should consider specific mitigation measures to reduce significant biological impacts, and identifies mitigations to be included in project design.¹³

The CMP EIR biological resource section will contain an update of the RMP EIR setting discussion and will include an analysis of specific CMP projects with the potential to have significant impacts. If possible, additional project-level mitigations, beyond those identified in the RMP EIR will be specified.

Individual projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. Additional project specific mitigations may be identified, as needed to mitigate significant project impacts, as part of any necessary subsequent environmental review.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
6.	<u>Noise:</u> Will the proposal result in:			
a.	Increases in existing noise levels?	—	<u>X</u>	—
b.	Exposure of people to severe noise levels?	—	<u>X</u>	—

¹¹Draft RMP EIR page 70.

¹²Draft RMP EIR page 151.

¹³Draft RMP EIR page 72.

CMP capital improvement projects will result in alterations to the existing regional transportation network. This may result in changes in regional traffic patterns and traffic associated noise levels along major traffic corridors. TDM measures associated with the CMP will result in changes in the level of transit use and car and van pooling. These changes may also alter traffic associated noise levels along major traffic corridors. The construction of individual capital improvement projects may result in localized short-term construction and traffic associated noise impacts.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
7.	<u>Light and Glare:</u> Will the proposal result in:			
a.	Will the proposal produce new light and glare?	—	<u>X</u>	—

The RMP EIR did not contain a discussion of potential light and glare impacts associated with the RMP since any potential impacts were judged to be local rather than regional in nature.

Individual projects included in the CMP could potentially create light and glare. The degree of impact would depend on the type of project and the specifics of the project design. Individual improvement projects would be subject to subsequent environmental review in accordance with CEQA. Additional project specific mitigations may be identified, as needed to mitigate significant project impacts, as part of any necessary subsequent environmental assessments.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
8.	<u>Land Use:</u> Will the proposal result in:			
a.	Will the proposal result in a substantial alteration of the present or planned land use of an area?	—	<u>X</u>	—

The RMP EIR assumes the land use pattern analyzed in the EIR for the Regional Growth Management Plan (GMP). Although the CMP is consistent with the goals and objectives of the RMP, it may include transportation strategies which were not contemplated at the time the environmental work for the RMP and GMP was conducted. The CMP EIR will include a land

use section which will evaluate the potential of the CMP to alter land use and an evaluation of the project's consistency with regional plans.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
9.	<u>Natural Resources:</u> Will the proposal result in:			
a.	Increase in the rate of use of any natural resources?	—	<u>X</u>	—
b.	Substantial depletion of any nonrenewable natural resources?	—	—	<u>X</u>

The construction of CMP related capital improvement projects may increase the rate of use of gravel and concrete materials in the region. However, no significant depletion of these resources is anticipated to result from the implementation of the CMP since these resources are plentiful. Implementation of the CMP would also affect fuel use. Fuel use impacts are discussed in the energy section of this checklist.

For these reasons no natural resources section will be included in the CMP EIR.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
10	<u>Risk Of Upset:</u> Will the proposal result in:			
a.	A risk of an explosion or the release of hazardous substances (including but not limited to oil, pesticides, chemicals or radiation) in the event of an accident or upset condition?	—	—	<u>X</u>
b.	Possible interference with an emergency response plan or an emergency evacuation plan?	—	<u>X</u>	—

Construction of CMP related capital improvements may disrupt surface traffic during the construction period. The construction of capital improvements could therefore create short-term localized interference which could slow emergency vehicle response time. Implementation of the CMP should improve overall emergency response time by reducing congestion on the

region's highway system. Response time impacts will be discussed in the public services section of the CMP EIR.

No increased risk of explosion or release of hazardous substances is anticipated as a result of implementation of the CMP. Individual projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. If individual projects are determined to present the potential to create a risk of upset, the potential will be assessed as part subsequent environmental review.

For these reasons no risk of upset section will be included in the CMP EIR.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
11	<u>Population:</u> Will the proposal result in:			
	a. Will the proposal alter the location distribution, density or growth rate of the human population of an area?	—	—	<u>X</u>

The RMP EIR assumes the land use pattern analyzed in the EIR for the Regional Growth Management Plan (GMP). The CMP is consistent with the goals and objectives of the RMP and GMP. At this time the CMP does not include any components which would significantly alter the land use in the region. For this reason, no population, employment or housing section will be included in the CMP EIR.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
12	<u>Housing:</u> Will the proposal result in:			
	a. Will the proposal affect existing housing, or create a demand for additional housing?	—	—	<u>X</u>

See discussion under Population above.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
13	<u>Transportation/ Circulation:</u> Will the proposal result in:			
a.	Generation of substantial additional vehicular movement?	—	<u>X</u>	—
b.	Effects on existing parking facilities, or demand for new parking?	—	<u>X</u>	—
c.	Substantial impact upon existing transportation systems?	—	<u>X</u>	—
d.	Alterations to present patterns of circulation or movement of people and/or goods?	—	<u>X</u>	—
e.	Alterations to waterborne, rail or air traffic?	—	<u>X</u>	—
f.	Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?	—	—	<u>X</u>

The purpose of the CMP is to create a mechanism for addressing congestion on the regional transportation network. As discussed in the RMP EIR, the capital improvement component of the CMP should have a substantial positive impact on the existing transportation system.¹⁴ The construction of capital improvements are likely to result in changes in traffic patterns and the use of traffic modes. Changes in traffic patterns could result in localized increases in vehicular movement. Improved traffic facilities should decrease traffic hazards. Rail related capital improvement projects are included in the CMP.

The CMP EIR will contain an updated traffic setting and impact assessment. The analysis will include a general discussion of the potential traffic and transit impacts of the improvement projects contained in the CMP's CIP.

¹⁴Draft RMP EIR page 36.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
14	<u>Public Services:</u>			
	Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:			
a.	Fire protection?	—	<u>X</u>	—
b.	Police protection?	—	<u>X</u>	—
c.	Schools?	—	—	<u>X</u>
d.	Parks or other recreational facilities?	—	<u>X</u>	—
e.	Maintenance of public facilities, including roads?	<u>X</u>	—	—
f.	Other governmental services?	<u>X</u>	—	—

The RMP EIR does not contain an analysis of public service impacts since the RMP was formulated in conjunction with the Regional Growth Management Plan (GMP) and fire, police, school and recreational facility impacts associated with the land use pattern changes resulting from the GMP are discussed in the EIR for the GMP. The CMP is designed to be consistent with the RMP.

Overall implementation of the CMP could result in a positive impact on public services by increasing emergency vehicle response time and access by reducing traffic congestion. Construction of CMP related capital projects could result in short-term disruptions to public services. If individual capital projects included in the CMP are located in or adjacent to existing recreational areas, recreational impacts could result.

Individual capital projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. If an individual project is determined to present the potential to create public service impacts, other than short-term construction related impacts, the potential will be assessed as part of subsequent environmental review.

Capital improvements associated with the CMP will result in transportation facilities improvements which could in turn result in additional maintenance demands.

Local governments are required to comply with the CMP. This compliance will affect project review activities, will require TDM ordinance adoption and will require CMP network monitoring activities. These demands could divert resources from the provision of other government

services. Local governments which comply with the CMP will receive additional revenue, in the form of gas tax monies and ensure that the complying local agency will continue funding opportunities for their STIP capital improvement projects through the STIP process.

These potential impacts will be discussed in the public services section of the CMP EIR.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
15	<u>Energy:</u> Will the proposal result in:			
a.	Use of substantial amounts of fuel or energy?	—	<u>X</u>	—
b.	Substantial increase in demand upon existing sources of energy, or require the development of new sources of energy?	—	<u>X</u>	—

The RMP EIR contains an analysis of the energy impacts of changes in on-road fuel use, transit energy use, and RMP facilities construction. Changes in on-road fuel use are a function of fuel economy trends, fuel costs, fuel economy policies, fleet turn-over, speed, and vehicle miles traveled. Speed and vehicle miles traveled are in turn a function of land use patterns and rideshare and transit rates which are in turn affected by changes in policy and changes in the highway and transit networks. The analysis contained in the RMP EIR is based on 1988 information regarding these factors. Construction of capital improvement projects would require the expenditure of energy. The CMP EIR will contain an analysis of CMP related transit, on-road fuel use and facilities construction using updated factors, if available.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
16	<u>Utilities:</u> Will the proposal result in a need for new systems, or substantial alterations to the following utilities:			
a.	Power or natural gas?	—	—	<u>X</u>
b.	Communications systems?	—	—	<u>X</u>
c.	Sewer or septic tanks?	—	—	<u>X</u>
d.	Storm water drainage?	—	<u>X</u>	—
e.	Solid waste and disposal?	—	—	<u>X</u>

The RMP EIR does not contain an analysis of utilities impacts since the RMP was formulated in conjunction with the Regional Growth Management Plan (GMP) and utilities impacts associated with the land use pattern changes resulting from the GMP are discussed in the EIR for the GMP. The CMP is designed to be consistent with the RMP and no additional negative program level impacts are anticipated.

Individual projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. If an individual project is determined to present the potential to create utilities impacts, the potential will be assessed as part of the environmental assessment for that project.

Construction of individual CMP related capital projects could alter existing storm drainage. The nature of the alteration would depend on the specifics of the design of the individual projects. Individual projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. If an individual project, or updates to the CMP are determined to present the potential to create drainage impacts, the potential will be assessed as part of subsequent environmental review.

For these reasons no utilities impact discussion will be included in the CMP EIR.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
17	<u>Human Health:</u> Will the proposal result in:			
a.	Creation of any health hazard or potential health hazard (excluding mental health)?	—	—	<u>X</u>
b.	Exposure of people to potential health hazards?	—	—	<u>X</u>

The RMP EIR does not include a discussion of human health impacts. Human health impacts associated with seismic safety and air quality impacts of the CMP will be discussed in those sections of the CMP EIR. No additional discussion of human health issues will be included in the CMP EIR. No exposure to agents of disease is expected to result from the CMP. Any human health impacts involving risk of upset would be the result of the specific design and operation of facilities and facilities improvements funded under the CMP. Individual projects under the CMP and updates to the CMP would be subject to subsequent environmental review in accordance with CEQA. If an individual project, or CMP update, is determined to present the potential to create human health impacts, the potential will be assessed as part of the subsequent environmental review.

For these reasons no human health section will be included in the CMP EIR.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
18	<u>Aesthetics:</u>			
	Will the proposal result in:			
a.	The obstruction of any scenic vista or view open to the public, or will the proposal result in the creation of an aesthetically offensive site open to public view?	—	<u>X</u>	—

The RMP EIR includes a discussion of the factors which determine a project's potential to create aesthetic impacts as well as a discussion of both how classes of RMP projects and specific RMP projects would affect aesthetics. The classes of RMP project's discussed in the RMP EIR are TDM, TSM, high-flow arterial, high-occupancy vehicle facilities, mixed-flow facilities, transit facilities, and non-motorized transportation. The RMP EIR concludes that the adverse impacts of RMP facilities can be reduced through design, the specific aesthetic elements of which must be determined on a case by case basis. It includes under mitigations general considerations which should be incorporated in facilities design.¹⁵ These mitigations would be incorporated by reference in the CMP EIR since the CMP EIR will be tiered off the RMP EIR.

Individual projects under the CMP would be subject to subsequent environmental review in accordance with CEQA. If an individual project, or a CMP update, is determined to present the potential to create aesthetic impacts, the potential will be assessed as part of subsequent environmental review for the project or update.

For these reasons, no aesthetics discussion will be included in the CMP EIR.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
19	<u>Recreation:</u>			
	Will the proposal result in:			
a.	An impact upon the quality or quantity of existing recreational opportunities?	—	<u>X</u>	—

Construction of individual CMP CIP projects could affect regional recreational facilities.¹⁶ The CMP EIR will identify CMP projects with the potential to impact regional resources, as part of the public services section of the EIR.

¹⁵Draft RMP EIR page 95.

¹⁶Draft RMP EIR, page 110.

Individual projects under the CMP, or CMP updates, would be subject to subsequent environmental review in accordance with CEQA. If an individual project, or CMP update, is determined to present the potential to create recreation impacts, the potential will be assessed as part of subsequent environmental review.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
20	<u>Cultural Resources:</u>			
	Will the proposal result in:			
a.	An alteration or destruction of a prehistoric or historic archeological site?	—	<u>X</u>	—
b.	Adverse physical or aesthetic effects to a prehistoric or historic building, structure of object?	—	<u>X</u>	—
	Does the proposal have the potential to cause a physical change which would affect unique ethnic cultural values?	—	<u>X</u>	—
c.	Will the proposal restrict existing religious or sacred uses within the potential impact area?	—	—	<u>X</u>

The RMP EIR identifies the location of significant historic and cultural resources in the SCAG region and identifies individual RMP projects which are likely impact cultural resources. General project level mitigations for cultural and historic resource impacts are identified in the RMP.¹⁷

CMP cultural resource impacts will depend on the location of specific capital improvement projects and whether they are located in archaeologically, historically, or culturally significant areas. Additional resources have been added to the list of LA City Cultural Monuments and the National Register of Historic Places since the RMP EIR was written. The CMP EIR will be tiered of the RMP EIR. It will contain an updated discussion of the potential impacts associated with classes of CMP projects and identification of individual CMP projects with the potential to

¹⁷Draft RMP EIR pages 111 to 112.

create significant historic and cultural resource impacts. No significant impact on religious uses in anticipated.

Individual projects under the CMP, and CMP updates, would be subject to subsequent environmental review in accordance with CEQA. If an individual project, or an update, is determined to present the potential to create cultural or historic resource impacts, the potential will be assessed as part of the subsequent environmental review.

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
21	<u>Mandatory Finding of Significance:</u>			
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	—	—	<u>X</u>
b.	Does the project have the potential to achieve short-term, to the disadvantage of long-term environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future.)	—	—	<u>X</u>

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
21	<u>Mandatory Finding of Significance:</u>			
c. (continued)	Does the project have impacts which are individually limited, but cumulatively considerable? (A project may impact on two or more separate resources where the impact on each resource is relatively small, but where the effect of the total of those impacts on the environment is significant.)	—	<u>X</u>	—
d.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	—	—	<u>X</u>

The CMP contains five major elements. Although the impact of individual CMP measures and capital improvement projects alone may be small, the program and improvement projects as a whole may pose the potential to create significant positive or negative geotechnical, air quality, noise, land use, water, biological resource, transportation, public service, energy light and glare and cultural resource impacts.

As detailed in the Check List discussion, no significant program level impacts on natural resources, risk of upset, population, employment or housing, utilities, human health or aesthetic impacts are identified. These types of impacts would be dependant on the location of specific capital improvement projects or the specifics of the deficiency plan process which may be included in updates to the CMP. Individual projects under the CMP, and CMP updates, would be subject to subsequent environmental review in accordance with CEQA. As noted in the Check List discussion of specific impact categories, where appropriate, the CMP EIR will include identification of specific improvement projects which clearly pose the potential to create significant environmental impacts.

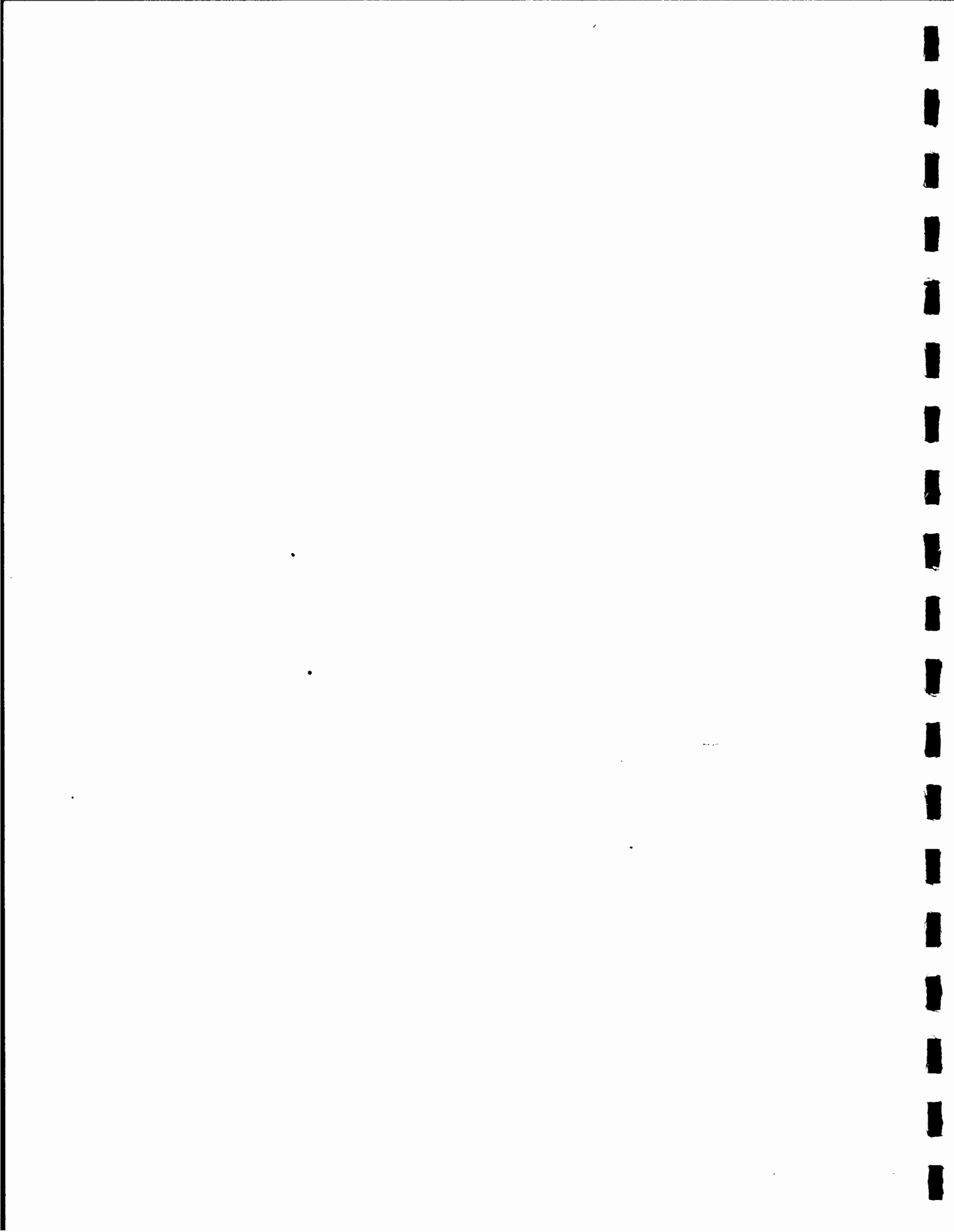
V. DETERMINATION

On the basis of this initial evaluation:

- I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project by the applicant. A MITIGATED NEGATIVE DECLARATION WILL BE PREPARED.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Date: JUNE 4, 1992

KENNA S. NODDIES
(Signature)



LOS ANGELES COUNTY CONGESTION MANAGEMENT PROGRAM

Response to Comments on the CMP Draft Environmental Impact Report

SCH # 91121063
SCAG Clearing House # LA-55791-MT

October 1992



Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, California 90017



INTRODUCTION

The CMP Draft Environmental Impact Report was released in July 1992. The comment period for the CMP Draft Environmental Impact Report ended with LACTC receiving 18 comment letters. In addition, two public meetings were conducted to receive public comments. The California Environmental Quality Act requires that LACTC prepare a Response to Comments document to address all of the comments received. This Response to Comments document, when combined with the Draft Environmental Impact Report, constitutes the Final Environmental Impact Report for the Congestion Management Program. The attached Response to Comments has now been completed and is ready for public release. Statute requires that the Response to Comments be released for public review a minimum of 10 days prior to certification of the Final Environmental Impact Report. Consideration of Final Environmental Impact Report certification is scheduled for the LACTC Commissions' November meeting.

Additional copies of this document are available by calling the CMP Hotline at (213) 244-6599.

VII. COMMENTS RECEIVED ON CMP DRAFT EIR AND AGENCY RESPONSES

A. RESPONSES TO LETTERS RECEIVED ON THE CMP DRAFT EIR

Letter 1. Response to Comments from Jerry Baxter, District Director, Caltrans District 7, September 8, 1992.

1. Comment noted.
2. Both the Land Use Analysis Program and the Transit Review requirements of the CMP pertain only to projects for which an EIR will be prepared. Both programs provide that projects for which a Notice of Preparation was distributed prior to local adoption of the Land Use Analysis Program and/or TDM Ordinance, be exempted from the respective program requirements. The Notice of Preparation stage was selected for a cut off point, rather than EIR's certified prior to local jurisdiction adoption of the Land Use Analysis program and/or TDM Ordinance in order to avoid disruption for projects that are in processing at the local level. Potential costly project redesign work and delay in project processing which would result from exemption at the EIR stage could be significant for both the developer and local jurisdiction staff.

Please refer also to Response to Comment 3.

In addition, changing the exemption timing for the Land Use Analysis Program would create inconsistency between CMP elements.

3. In the August 1991 draft CMP, a countywide mitigation fee was discussed as a mechanism to meet the land use analysis requirement and address the deficiency plan process. LACTC took action in early 1992 not to further pursue a countywide mitigation fee approach, but to instead conduct a Countywide Congestion Study to develop an alternative approach for deficiency plan requirements. Pursuant to Commission direction a mitigation fee approach will not be considered.

The mitigation fee represented one alternative approach to meeting CMP deficiency plan requirements. Study of that alternative showed the complex issues which must be considered in development of deficiency plans, and the time which must be spent on both technical evaluation as well as building consensus toward workable solutions. This experience has been echoed throughout the state, as nearly all other counties are still in the process of developing deficiency plan guidelines.

It should also be reiterated that the deficiency plan is not an element that is required to be included in the CMP. "Deficiencies," by definition, do not occur and need not be addressed until portions of the system are shown to degrade below the level of service standard. Since the CMP is currently documenting levels of service for the first time, degradation of the system has not been shown. Local jurisdictions will not be responsible for implementing deficiency plans until the Countywide Study has been completed and LACTC adopts countywide deficiency plan guidelines.

The Countywide Congestion Study currently underway will evaluate congestion levels anticipated for the year 2010, and define countywide strategies for addressing the deficiencies caused. The congestion levels studied will be based on regional growth projections and will encompass the cumulative effects of all development on the regional system, not just those caused by significant projects. The Study will investigate a method for crediting public or private improvements to the CMP system. The Study will also examine land use scenarios that maximize trip generation and will evaluate a program to create and encourage incentives for local land use decisions that reduce trips and that are supportive of development in proximity to transit centers and along major transit corridors. The results of the Countywide Congestion Study will be presented to the Commission for adoption in the 1993 CMP, which will be subject to further environmental analysis.

4. Comment noted.
5. Comment noted.
6. The projection of HOV and transit lanes presented on page 37 of the CMP EIR is based on the 1989 RMP figures and is for the entire six-county region encompassed by the RMP. The LACTC 30-Year Integrated Transportation Plan (LACTC, April 1992) proposes to build within Los Angeles County over 200 miles of new carpool lanes in the next 10 years, and over 300 miles by the end of the 30-year plan.

These projections are currently the adopted regional projections contained in the RMP, with which the CMP is required by law to be consistent. SCAG is currently updating these projections and the RMP, and subsequent CMP's will be consistent with the appropriate RMP update.

The reference to "land miles" in the first line of the Highway Improvement paragraph on page 37 of the CMP EIR is corrected to read:

lane-miles.

7. The second paragraph on page 51 of the CMP EIR is revised to read:

In addition to these facilities, major construction projects are on-going.
The following facilities are currently under construction:

I-120 (Foothill Freeway) HOV lane

I-105 (Glen Anderson Freeway): Norwalk to El Segundo

I-110 (Harbor Freeway) Transitway

I-405 (San Diego Freeway) HOV lane

U.S. 101 (Ventura Freeway) widening project

8. Please see responses to the more specific comments on the TDM Intensive Alternative from SCAG. (Response to Comments 22-25 and 27-31).

Memorandum

MICROFILMED
COPY IN RMC

To : Mr. Tom Loftus
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Date September 8, 1992

File No. IGR/CEQA
DEIR
County of Los Angeles
Countywide
Congestion Management
Program
Vic. LA-VAR

226298 SEP 11 1992

Jerry Baxter - District 7

From : DEPARTMENT OF TRANSPORTATION

Subject : Project Review Comments

SCH# 91121063

Caltrans has reviewed the above-referenced document. Based on the information received, we have the following comments:

We support the provision requesting local jurisdictions to expand their analysis of traffic impacts including cost estimates of local impacts to the CMP Highway/Roadway System, and we support publishing these analyses in project EIRs.

It is proposed that development projects be exempt from traffic fees if the EIR Notice of Preparation (NOP) was issued before mandatory local adoption of land use programs in April 1993. The exemption should be based on whether Certification of the EIR was made prior to April 1993, not on the NOP issuance date.

It is not preferable to have the local jurisdictions responsible for mitigating costs of improvements to the CMP Highway/Roadway System. The Congestion Management Agency is empowered to impose traffic impact fees and there is a need to revisit policy for a region-wide, uniform fee based on added trips and needed capacity. Together we have projected a multi-billion dollar short-fall in meeting thirty-year transportation demand. The short-fall could be prorated and funded by new development.

This region often leads the nation in demand for housing and office space. By providing these products, the developers benefit by a greater pro rata share than society as a whole. The labor pool is expanding even in the present economic slump and developers are attracting customers from out of the region and frequently, from out of state and country. To the extent the developers proportionately add trips to highways, they need to contribute to improving deficiencies caused by the traffic they generate.

We are sympathetic with concerns about delayed economic recovery; however, good circulation is essential to economic development. Developers have express concerns about traffic

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Mr. Tom Loftus
September 8, 1992
Page Two

delays and employee morale, and at an increasing rate, they are partially funding transportation improvements and/or are paying traffic impact fees to obtain free-flowing project ingress/egress.

The projection of HOV lane and transitway miles is based on 1989 RMP figures. This data should be updated.

The table on Page 51, pertaining to the CMP Highway/Roadway System is too conclusive, by indicating these projects will complete the system. U.S. 101 Ventura Freeway should be added to the table.

Regarding the TDM Intensive CMP Alternative, more information is needed on its land use, transportation facilities, and air quality impacts to support the assumptions.

If you have any questions regarding this response, please call me or Lew Bedolla at (213) 897-0362.


JERRY BAXTER
District Director

cc: Kendra Morries, Los Angeles County Transportation Commission
818 West Seventh Street, 11th Floor, Los Angeles, CA 90017

Cont'd
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Letter 2. Response to Comments from Arnold I. Sherwood, Ph.D., Director, Forecasting, Analysis, and Monitoring, Southern California Association of Governments, September 11, 1992.

9. Comments noted.
10. This is correct. The CMP EIR indicated that the CMP had been revised since publication of the August 1991 Draft CMP as follows: the highway element was revised to include a finalized CMP network; the Model TDM Ordinance had been further refined to identify minimum thresholds; and the Land Use Program had been significantly altered. These changes were also described in the CMP EIR.
11. The Los Angeles County CMP system was developed with extensive consultation with local jurisdictions. At SCAG's request, LACTC did consider including Holt Avenue and Mission Boulevard on the CMP system, and consulted with the City of Pomona and the San Bernardino Associated Governments in the process. LACTC found that both Holt Avenue and Mission Boulevard serve primarily local traffic and do not function as regionally significant arterials in the Los Angeles County CMP system. Significant countywide and inter-county travel in this portion of the county are primarily served by major highway corridors, such as the San Bernardino Freeway (I-10), the Pomona Freeway (State Route 60), or the Corona Expressway (State Route 71).

We have also reviewed Reservoir Road and Walnut Avenue in response to your CMP EIR comments. These two routes also function as local arterials in Los Angeles County. Additionally, they do not contribute to the continuity of the CMP systems in either county. Walnut Avenue terminates in Los Angeles County within one mile of the county line, and Reservoir Road terminates in San Bernardino County within one-half mile of the county line.

We have also considered the impact of not including the above stated routes in the Los Angeles County CMP system and find that there is no CMP impact because the funding impact of not including these routes on the CMP system, as State Flexible Congestion Relief and TSM funds can be used for local arterial improvements that are supportive of the CMP system. Holt Avenue and Mission Boulevard fit that criteria as they parallel the Los Angeles County CMP system. Additionally, the CMP network is not a significant factor in addressing inter-county congestion concerns, since CMP statute does not require inter-county mitigation. Inter-county mitigation is most effectively addressed through the coordination and agreement of jurisdictions on each side of the county line. LACTC is also supportive of developing agreements with our neighboring Congestion Management Agencies in how to address inter-county impacts.

LACTC and SANBAG both agree that since the major inter-county transportation corridors are included on the CMP systems of both counties, the connection of the above stated routes is not a regional or inter-county concern.

12. The purpose of the CMP statutory requirement for transit performance standards is to encourage utilization of transit services that compliment the CMP highway system in the attainment of highway level of service standards. To that end, a transit monitoring network was developed identifying transit lines that currently operate along five miles or more of the CMP highway system, and are within the boundaries of the LACTC Congested Corridor Action Plan (the Congested Corridor Action Plan can be obtained separately from LACTC upon request). The performance standards will assist LACTC in monitoring transit capacity and usage by transit corridor. Information regarding transit capacity and usage by corridor will be one factor considered by LACTC in making funding recommendations for the Short Range Transit Plan and the local Transportation Improvement Program.

The standards and monitoring network have remained the same since the August 1991 Draft CMP, with the exception of loading standards which have been eliminated. The monitoring network, routing index, frequency standard and coordination processes are unchanged. The CMP EIR evaluates the transit element of the CMP as currently proposed.

The transit element is consistent with the following policy statements listed in Chapter 2 of the Final Draft CMP (September 1992):

- 1) It is part of the basic core CMP program, consistent with statutory requirements.
- 2) Transit monitoring requirements make use of existing data collected that is necessary for meeting State and federal funding responsibilities. No new data collection requirements are established.
- 3) The transit element encourages coordination between transit providers; and transit operators and local jurisdictions through the transit review process outlined in the CMP Model TDM Ordinance (Appendix C of the CMP EIR).
- 4) The results of transit monitoring will be incorporated into other LACTC transportation planning processes.

13. As noted on pages 4, 22 and 29 of the CMP EIR, and explained in detail in Appendix C of the CMP EIR, the Model TDM Ordinance requires that for all development projects preparing an Environmental Impact Report, fixed route transit providers must be sent a Notice of Preparation and given an opportunity to comment on impacts of the project, identify transit and capital improvements as a result of the project and recommend mitigation measures based on the characteristics of the project and existing transit service. Impacts and recommended mitigation measures identified by the transit operator shall be evaluated in the EIR prepared for the project. It remains the discretion of the local jurisdiction to determine which mitigation measures will be required. (See Final Draft CMP, September 1992).

14. The transit standards established in the CMP are intended as a means for monitoring transit service levels in key transportation corridors within the County, with the purpose of serving as an informational and analytical tool to assist in regional planning efforts. As the standards are based on existing service levels, they are intended to monitor transit capacity and frequency, as well as to provide information as to the effectiveness of existing services.

General Plans typically do not include specific transit standards, rather they focus more on goals and objectives regarding mobility and transit provision.

Since CMP transit standards would help make additional information available for transit planning and decision-making, they serve to support transit policies set forth in the adopted General Plans of both the County and local jurisdictions. However, there would be no direct relationship between CMP transit standards and local General Plans, and no changes would be required in local General Plans either to implement or in response to CMP transit standards.

15. As discussed in Response to Comment 14, the transit standards established in the CMP are intended as a means for monitoring existing transit service levels on key CMP transportation corridors. These standards will help LACTC identify corridors where transit is working well and corridors where transit usage could be enhanced. This system monitoring will allow LACTC to further study the characteristics of successful services and how to replicate such service in other corridors, thus, enhancing the use of transit as called for in both the Regional Mobility Plan, the Air Quality Management Plan, and local transit plans.

16. The CMP transit monitoring network and performance standards are analysis tools that will assist LACTC in making funding decisions through the Short Range Transit Planning process and the local Transportation Improvement Program. Of the transit funding sources, only the State Flexible Congestion Relief funds are required to be included in the CMP. However, the ability to examine the impact of transit service on the CMP system is likely to assist in the recommendation of transit projects submitted for federal funding under the developing ISTEA regulations, as well as to assist LACTC in making funding recommendations for local sources.
17. The impacts and affects on policies, issues and actions as related to inter-jurisdictional and inter-county transit service provisions are positive. The CMP Transit Monitoring network was developed to focus on countywide and inter-jurisdictional transit mobility. Coordination standards between municipal transit operators enhances coordination between jurisdictions. Inter-jurisdictional service provision is addressed by virtue that the network is countywide. Inter-county transit operations will be further examined in future CMP updates.
18. The Model TDM Ordinance (Appendix C of the CMP EIR), provides transit operators the opportunity to comment on mitigation needs related to new development by requiring that affected transit operators receive the Notice of Preparation for all projects preparing an EIR. Transit operators may choose to examine CMP transit performance standards in developing their recommendations to local jurisdictions regarding transit mitigation needs.

The Model TDM Ordinance requires "TDM friendly" facilities that provide physical amenities that encourage individuals to be aware of and make use of transit. These facilities utilize building design that is supportive of transit ridership and compliments current bus operations.

19. The Model TDM Ordinance, Appendix C of the CMP EIR, addresses non-motorized facilities through requirements for bicycle racks, pedestrian circulation, and bicycle circulation considerations for new non-residential development. Telecommuting is listed as an optional strategy that cities may choose to consider, beyond the minimum requirements of the Model TDM Ordinance (Final Draft CMP, September 1992).

Table 13 on page 78 of the CMP EIR is revised to read:

"1B. Non-Motorized Transportation - TDM Model Ordinance"

20. The CMP TDM Element focuses on local jurisdiction implementation of a Model TDM Ordinance which implements "TDM friendly" design standards for new non-residential development. This is an important aspect of TDM that is often overlooked by local jurisdictions, and will compliment other efforts, such as the SCAQMD's Regulation XV employer trip reduction/mode shift strategies. The CMP Capital Improvement Program also includes projects, such as HOV lanes and transitways, that are supportive of mode shift strategies as well. These efforts all work toward the attainment of regional air quality and mobility goals.

21. The CMP Model TDM Ordinance, (Appendix C in the CMP EIR), focuses on incorporating "TDM-friendly" facilities into the design of new non-residential development and, as such, complements the employer-based performance approach of SCAQMD's Regulation XV. The Model TDM Ordinance also supports ongoing planning and implementation of centers, bicycle lanes, and multi-modal transfer centers, among other strategies, at both the regional and local level. Thus, successful implementation of TDM strategies contained in the CMP Model TDM Ordinance assists in achieving regional mobility and air quality goals. However, successful implementation of CMP TDM strategies is not expected to result in demand for HOV, transit or other TDM-related modes, beyond levels called for in the RMP.

The RMP includes a set of capital improvements integrated with projected mode shifts related to TDM measures; that is, RMP capital improvements are designed to accommodate demand generated by TDM measures. Since the CMP TDM element will not increase demand beyond the level anticipated in the RMP, the CMP TDM element will not induce demand for infrastructure beyond RMP plans, and no additional impacts are projected.

22. We agree that a balance needs to be struck between TDM strategies and capital improvements as called for in the RMP. The CMP Program, the preferred alternative, reflects that balance, which is not achieved by either the TDM Intensive or Facility Intensive alternatives.

The first sentence of paragraph 3 on page S-29 is modified to read:

Although the TDM Intensive Alternative is environmentally superior to the other alternatives, it does not meet the project goals, unlike the CMP which provides a balance of TDM and capital improvements necessary to meet mobility needs.

The first sentence of paragraph 3 on page 174 is modified to read:

Although the TDM Intensive Alternative is environmentally superior to the other alternatives, it does not meet the project goals, unlike the CMP which provides a balance of TDM and capital improvements necessary to meet mobility needs.

23. The impact of the TDM Intensive Alternative, which increases investment in TDM while minimizing facility investments, is similar to Alternative 5 in the RMP EIR. RMP Alternative 5 indicated that TDM solutions alone will not accomplish regional mobility needs, and that under this scenario increased levels of congestion occur. As previously noted by SCAG (see Response to Comment 22), a balance must be achieved between facilities and TDM strategies. As with RMP Alternative 5, this balance is not achieved under the TDM Intensive Alternative.

Please refer to related CMP EIR discussions on pps. 170-172, 174 and 153-163 (Table 26). Please refer also to related RMP EIR discussions on pps. 159-171.

24. The TDM Intensive Alternative in the CMP EIR (pps. 170-172) seeks to achieve the transit and rideshare goals of the RMP, including a 30% reduction in auto-based home-work trips, a 22.4% carpool/vanpool share, and a 19.4% transit mode share. This is a significant shift from current transit and ridesharing levels for the Los Angeles County region.

The CMP EIR indicates that the magnitude of behavioral change required to attain these goals, could also affect locational decisions in the larger sense as well. As the magnitude of strategies necessary to attain the TDM goal has not been fully developed at the regional level, it is not possible to document the probable impact of locational decisions. The CMP EIR merely indicates that such changes could occur.

As the ability to specifically quantify land use/transportation impacts is very imprecise (see Response to Comment 26), the TDM Intensive alternative discussion indicates the potential for creating changes in land use. The benefits of TDM are not fully realized under this alternative, because it does not contain the balance between TDM and capital facilities identified by SCAG as necessary (see Response to Comment 22).

25. The potential deconcentration effects of strategies such as market pricing would depend on the specific design of those strategies. While it is true that pricing strategies can be designed in such a way as to encourage increased density, strategies which increase the costs of development can also act as locational disincentives.

The RMP EIR indicated that mobility restrictions (e.g. parking costs, tolls, etc.) could deter businesses and an experienced workforce from remaining in or relocating to the region. The RMP EIR was incorporated into the CMP EIR by reference.

26. Pages 56 and 79 of the CMP EIR indicate that "should implementation of the CMP result in urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in regional plans, the CMP could have a negative effect on the transportation system by increasing vehicle miles traveled". As noted in Chapter IV of the CMP EIR (pps. 144-151), there are significant factors in the Los Angeles region which encourage a deconcentration of land use and the associated development of land in undeveloped areas. These factors include: 1) the desire to purchase affordable housing leading to development in less developed areas; 2) the desire to attain a quality of life which avoids the consequences of urban development, such as congestion; and, 3) Los Angeles's reliance on the automobile as the major form of transportation in the region.

The CMP EIR concludes that when compared to the power of these locational decisions, the deconcentration effect of the CMP is arguably not significant. This conclusion is further supported by a study evaluating the relationship of transportation systems in introducing growth prepared by Professor Genevieve Giuliano of the University of California, Irvine ("Land use Impacts of Transportation Investments: Highway and Transit", In the Geography of Urban Transportation, edited by Susan Hanson, the Guilford Press, 1986). In her extensive analysis of the interaction between transportation and land use in metropolitan areas, Professor Giuliano concluded:

"Empirical evidence on the land use impacts of both highway and transit indicates that transportation investments do not have a consistent or predictable impact on land use... The evidence clearly shows that land use change does not necessarily follow transportation investments, even when the dollar value of these investments is large. Rather, availability of developable land, favorable economic conditions, and local political support have been identified as key factors in most studies."

The CMP EIR further concludes that the CMP's TDM Element and transit related capital improvements may marginally serve to inhibit the current rate of deconcentration by reducing the attractiveness of the automobile as the major form of transportation and increasing the attractiveness of alternative travel modes. Also, CMP LOS standards have been established at the level of system capacity where congestion itself may create a disincentive for continued development, and for development to move to less congested areas. Because of the magnitude of congestion in Los Angeles County, the challenge of the CMP will be to attain LOS standards. It is unlikely that improvements on the system will bring LOS above standards. Because the CMP is not anticipated to lead to substantial improvements above current levels of service and associated increases in travel speed which make housing in outlying areas more attractive to the regions's workers it should not further the kind of deconcentration that results from ease of mobility. Finally, by maintaining mobility at established levels of service, the CMP will not encourage deconcentration related to avoidance of congestion.

The CMP EIR also indicated (page 56), that CMP related improvements could have the effect of increasing vehicle miles traveled as a result of latent demand, but that this potential is considered to be negligible. Page 42 of the CMP EIR notes that some argue that increasing system capacity encourages additional trips on the system by reducing the costs (time and stress) associated with trip-making. These additional trips are referred to as latent demand. Standard traffic modeling techniques, however, do not indicate that demand changes as a result of increased capacity, and there has been relatively little research to date with respect to the presence or magnitude of this potential effect. The recent sensitivity analysis conducted in conjunction with SCAG's 1991-1997 Clean Air Conformity Report suggested that travel demand is relatively inelastic with respect to system speed (Final Report. Conformity of SCAG's 1989 Regional Mobility Plan and SCAG's FY 1991/1997 Regional Transportation Improvement Program under the Clean Air Act Amendments, SCAG, September 1991).

Please refer also to response to Comments 3, 33, 64, 92, 94, 120 and 127.

27. Under the TDM Intensive Alternative, higher congestion levels will occur than with the CMP program, the preferred alternative. It is likely that these higher levels of congestion will have a greater impact on land use changes.

Please refer also to Response to Comments 24 and 61.

28. No city in the United States has put in place TDM strategies aimed at achieving a 30% reduction in auto-based home-work trips, a 22.4% carpool/vanpool share and a 19.4% transit mode share as called for in the RMP. Although work has been done to begin to quantify the benefits of various TDM strategies, this quantification effort is in its early stages. See for example: "Preliminary Draft: Implementation of the Transportation Demand Actions", released by the AQMD in July 1992, which is the AQMD's initial attempt to quantify the benefits of TDM strategies or, "Transportation Control Measure Information Documents" published by the EPA in March 1992, which the EPA considers to be a first step in quantifying TDM benefits.

29. In its discussion of alternatives, the RMP EIR suggests that alternatives that promote other than a balanced program of highway and arterial improvements, transit improvements and TDM would not be able to achieve air quality objectives consistent with the AQMP.

Please refer also to Response to Comment 61.

30. Please refer to Response to Comment 23 which explains the evidence that increased levels of congestion occur under the TDM Intensive Alternative and that it would not therefore be as effective as the CMP in maintaining mobility levels on the highway network. Any increase in congestion will increase police and fire-department response times.

31. The socio-economic benefits (and costs) of the TDM Intensive Alternative would be similar to those of RMP EIR Alternatives 4 and 5. Please see Table 26, pages 153-163 of the CMP EIR for a summary of these impacts.

32. Comment noted. Arterial improvements to Route 1 (Lincoln Boulevard) and construction of the Metro Green Line rail transit route serve the Los Angeles International Airport (LAX) area.

Line 6 of Table 13 on page 78 of the CMP EIR is corrected to indicate that the CIP-Rail Improvements meet TCM 8:

18. CIP-Rail Improvements and CIP Arterial System Improvements

33. As discussed in Chapter IV (pp.144-149) of the CMP EIR, the CMP program as a whole is unlikely to result in significant urban concentration and deconcentration effects. Moreover, Mitigation Measure C.3, requires:

"The LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional goals will be proposed in consultation with local, regional, and state agencies."

This mitigation measure assures that should the growth and land use assumptions of the adopted regional planning documents upon which determination of CMP impact was based, are not realized in coming years, future CMP updates and the associated environmental documentation will be required to address and mitigate, to the extent feasible, any currently unforeseen land use impacts.

The CMP EIR acknowledges that land use impacts relating to urban concentration and deconcentration may be associated with individual projects identified as part of the CIP element of the CMP program. Although CIP projects are identified in the CMP, they are at an insufficiently advanced stage of planning to permit analysis of their effects on urban concentration and deconcentration. Individual CIP facilities will be subject to project-level environmental review when they reach a stage of design which will permit the effective analysis of their environmental effects. Similarly, specific development projects are subject to review, including CEQA review, by local jurisdictions, and may be subject to conditions addressing land use impacts by the affected jurisdiction.

Please refer also to response to Comment 26.

34. TCM Measure 17, Growth Management, is included in Table 6 (page 39) of the CMP EIR: AQMP Transportation Control Measures. The 1991 AQMP update, as explained on pages 38-40 of the CMP EIR, provides subregional VMT reduction targets. These targets are an outgrowth of the jobs/housing balance growth management tool included in the 1989 RMP.
35. On page 147 of the CMP EIR, the table is corrected to indicate that employment in the Southern California Region:

Would increase to 8.9 million by the year 2010



818 West Seventh Street, 12th Floor • Los Angeles, California 90017-3435 ☐ (213) 236-1800 • FAX (213) 236-1825

EXECUTIVE COMMITTEE

September 11, 1992

President
Rep., Cities of San Bernardino County
John Longville, Mayor
Rishi

Kendra Morries
Los Angeles County Transportation Commission
818 West Seventh Street, 11th Floor
Los Angeles, CA 90017

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Rep., Imperial County
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Judy Nieberger, Councilmember
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Past President
Rep., Ventura County
John Flynn, Supervisor

RE: Los Angeles County Congestion Management Program Draft Environmental Impact Report. SCAG No. LA-55791-MT.

Los Angeles County
Mike Antonovich, Supervisor
Denise Dana, Supervisor

Dear Ms. Morries:

Orange County
Harrist Wiedler, Supervisor

Thank you for providing SCAG with the opportunity to comment on the Draft EIR for the Los Angeles County Congestion Management Program. As you know, under Government Code Section 65089.2, SCAG is required to evaluate Congestion Management Programs for consistency with the Regional Transportation Plan, compatibility with other Congestion Management Programs in the region and consistency with SCAG's regional model and database. On December 5, 1991, SCAG's Executive Committee formally approved recommendations and detailed comments on the CMP. We previously provided this information to you in our letter dated January 28, 1992. For your convenience, a copy of that letter is attached.

Riverside County
Norton Younglove, Supervisor

San Bernardino County
Jon Mikels, Supervisor

Cities of Los Angeles County
Robert Bartlett, Mayor
Monrovia

Cities of Imperial County
Stella Mendez, Councilmember
Barstow

Cities of Orange County
Erwin Fried, Mayor
Yorba Linda

Cities of Ventura County
John Melton, Councilmember
Santa Paula

The comments provided here are intended to determine the adequacy of the DEIR in evaluating the positive and negative impacts that the CMP will have in Los Angeles County and in the region. SCAG will be able to make its consistency finding when a Congestion Management Program is adopted by the LACTC. At that time, SCAG will be able to give a final determination of consistency and compatibility of the CMPs for the six county region.

City of Los Angeles

Tom Bradley, Mayor
Mark Ridley-Thomas, Councilmember
Hal Berman, Councilmember

City of Long Beach
Clarence Smith, Councilmember

POLICY COMMITTEE CHAIRS

Hal Croys, Mayor Pro Tem
Lomita; Chair, Transportation and Communications

Diana Ring, Mayor Pro Tem
Claremont; Chair, Energy and Environment

Scott Garrett, Vice Mayor
Hemet; Chair, Community, Economic, and Human Development

The CMP Technical Working Group, consisting of CMP staff for each of the five Transportation Commissions and the SCAG CMP coordinator, will continue to meet to discuss issues related to CMP. This group will also discuss improved inter-county coordination and compatibility, potential implementation solutions, implications of the 1991 Intermodal Surface Transportation Efficiency Act and a legislative agenda to improve the CMP process. Recommendations from this group will be brought back to the AB 1246 Committee for discussion and possible action.

AT-LARGE DELEGATES

Robert Lewis, Mayor
Thousand Oaks

Fred Aguilar, Mayor
Chino

Richard Kelly, Mayor
Palm Desert

ALTERNATES

Imperial County • Sam Sharp, Supervisor • Los Angeles County • Ed Edelman, Supervisor and Kenneth Hahn, Supervisor • Orange County • Gaddi
side County • Melba Dunlap, Supervisor • San Bernardino County • Larry Walker, Supervisor • Ventura County • Vicky Howard, Supervisor • Cit
Sanchez, Jr., Mayor Pro Tem, Westmorland • Cities of Los Angeles County • Abbe Land, Councilmember, West Hollywood • Cities of Orange County • Ruthelyn Plummer, Council
member, Newport Beach • Cities of Riverside County • (Vacant) • Cities of San Bernardino County • Elmer Digneo, Mayor Pro Tem, Loma Linda • Cities of Ventura County • Judy
Mikels, Councilmember, Simi Valley • City of Los Angeles • Richard Alatorre, Councilmember • Rita Walters, Councilmember • Michael Woo, Councilmember • Long Beach 2nd
position • Douglas Drummond, Councilmember • At Large • George Nakano, Councilmember, Torrance • Candace Haggard, Councilmember, San Clemente • Judy Wright,
Councilmember, Claremont • Ex-Officio • Judith Johnston-Weston, Los Angeles; Chair, Regional Advisory Council

9

**Letter to Ms. Kendra Morries
Los Angeles County Congestion Management Program
September 11, 1992**

Page 2

We look forward to working with you and your staff to ensure that the CMP process is successfully implemented. If you have any questions or desire additional information about the attached comments and letter, please contact Manuel Gurrola at (213) 236-1907.

Cont'd
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Sincerely,



Arnold I. Sherwood, Ph.D.
Director
Forecasting, Analysis and Monitoring

**Enclosures: January 28, 1992 letter w/attachments
 Summary of Transportation Control Measures**

20



**SCAG COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE LOS ANGELES CONGESTION MANAGEMENT PROGRAM**

ANALYSIS

The EIR states that the CMP has been revised since publication of the Final Draft CMP in 1991: Component One, the Highway Element, has been revised to include a final CMP network; Component Three, the TDM element, has been further refined to identify minimum threshold of effort; and Component Four, the Land Use Program, has been significantly altered.

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Component One: The Highway Element

Criteria 3 requires that the CMP Highway System connect with the system in neighboring counties. In the 1991 submittal of the CMP, there were three locations of interest to Los Angeles County where the CMP Highway Systems did not connect at the San Bernardino - Los Angeles Counties' boundaries: Holt Avenue, Mission Boulevard and Grand Avenue. Review of the EIR shows that with the exception of Grand Avenue, the other two locations do not connect with systems in San Bernardino County. In addition, two other locations do not connect with the San Bernardino County CMP: Reservoir Road and Walnut Avenue. The Draft EIR does not adequately address these issues. The final EIR needs to analyze the negative impacts of these systems not connecting or progress thereof.

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Component Two: The Transit Component

The "operational performance" TRANSIT STANDARDS are not included in the EIR document. The EIR document references a separate document (not included). The document further states that no substantive changes have occurred in the standards for transit from the final CMP Document. The standards and a narrative discussion should have been included which specifically addresses the issues, actions, intent and policies that specifically relate to the application, implementation and use of public transit as development mitigation for Los Angeles County. At a minimum, the following areas should have been addressed:

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- The internal form and function of transit as related to the policies, goals and objectives in the CMP document.

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- Establish what is the level of effort required from developers for evaluation of transit service(s) as potential mitigation action as part of the local plan development - approval, CEQA, NEPA and EIR/EIS process.

13

- Discuss the relationship of Transit Standards to the adopted General Plans for both the County and affected local jurisdictions.

14

- Provide a discussion on the relationship of the Transit Standards as they relate to the goals and objectives in the adopted Regional Mobility Plan, the Transportation Control Measures (TCMs) as contained in Appendix 4-G of the adopted Air Quality Management Plan, the implementation of the Centers Based Transit Network and to local transit goals and objectives.

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- Provide a discussion on the relationship of the Transit Standards as they relate to the long and short range transit capital improvement needs and specifically address methods for funding capital acquisitions.

16

- Provide a discussion on the impacts and effects on policies, issues and actions as related to inter-jurisdictional and inter-county service provision.

17

- Define the relationship and inter-action between the Transit Standards and the goals and objectives of the Transportation Demand Management program(s).

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Component Three: The TDM Element

1. On page 78, the EIR notes only the alternative work schedule provisions of the South Coast Air Basin's TCM 1. TCM 1 also contains provisions for telecommuting and non-motorized transportation. No mention is made in the EIR as to how the CMP will address implementation of those TCMs.

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2. On page 78 in specific, and throughout the EIR in general, implementation of TCM 2 mode shift strategies focuses on facilities and does not provide programmatic elements of how to encourage people to try and continue to utilize alternate facilities. This is particularly important in providing the supporting framework for local governments and employers to meet their AQMP goals and CMP trip reduction efforts.

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3. The EIR does not adequately address the implications of a set of successful TDM strategies on the need to refocus investment to accommodate shifts in demand toward alternative transportation infrastructure needs. These include increased demand for:

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- o Transit capacity
- o HOV capacity
- o Telecommuting centers
- o Bicycle lanes
- o "User-friendly" design and inter-modal/multi-modal transfer

4. On pages 170, 171 and 174 referencing the TDM Intensive Alternative, the EIR states that all capital improvements need to occur for TDM to work and that mobility would not be attained without these improvements. No corresponding statement exists in the preferred alternative that capital improvements would not alter the mobility levels without implementation of TDM with specific formal programmatic elements. The RMP seeks a balance between these strategies, not foregoing one for the other. The EIR also states that the TDM Intensive Alternative as a whole would be inconsistent with the RMP since it would not include the balance of capital improvement projects and modal strategies assumed in the RMP. However, the RMP states that TDM and capital improvements are needed to achieve mobility goals.

5. On pages S-29, 171 and 174, the EIR states that congestion on the transportation system would continue to degrade under the TDM Intensive Alternative without implementation of all of the CIPs included in the RMP. Also, that this degree of implementation of TDM would not be sufficient to maintain mobility or LOS standards.

The EIR provides no evidence that the transportation system would continue to degrade under the TDM Intensive Alternative or that implementation of TDM strategies would not be sufficient to maintain mobility or LOS standards.

Furthermore, the transportation system would continue to degrade without significant levels of TDM strategy implementation due the projected population increase over the next twenty years combined with the existing population. The capital improvements included in the CMP as described in the EIR would probably not be able to meet this demand without efforts to manage travel demand.

6. On pages 170-171, the EIR states that adoption of stricter TDM requirements has a potential for population and employment redistribution. No evidence is cited in the EIR that this would occur. The benefits of increased TDM requirements are not stated, e.g. less congestion (with improved LOS) resulting from successful TDM implementation and better air quality.

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7. On page 170, the EIR states that certain TDM measures such as market pricing mechanisms could also have activity relocation/deconcentration inducing effects. There is no evidence given to support this statement. Furthermore, adoption of certain TDM measures such as market pricing mechanisms could just as easily result in higher density and beneficial land use patterns. 25
8. On pages 56, 79 and 80, the EIR states that implementation of the CMP could result in increased urban deconcentration and could have the effect of increasing VMT due to latent demand resulting in air quality effects, but that the potential is negligible. No evidence is provided to support this statement of the impacts being negligible. 26
9. On pages S-29 and 174, the EIR states that the TDM Intensive Alternative would potentially result in more land use impacts than the proposed CMP. No evidence is provided in the EIR to support this conclusion. 27
10. On pages S-29, 170, 172, and 174, the EIR states that there is great uncertainty regarding the actions required to achieve these TDM goals. No evidence is provided to support this statement. 28
11. On page 171, the EIR states that the TDM Intensive Alternative would be inconsistent with the RMP and the AQMP, and would have negative air quality impacts when compared to the proposed CMP due to increased trip distances and related emissions. There is no evidence to support the statement that the TDM Intensive Alternative would be inconsistent with the RMP and AQMP. 29
12. On page 172, the EIR states that the TDM Intensive Alternative would not result in the maintenance of levels of service on the highway network, police and fire response times would continue to degrade. There is no evidence that implementation of the TDM Alternative would result in lower levels of service and that public services would continue to degrade. 30
13. The EIR does not address the socioeconomic benefits of the TDM Intensive Alternative. 31
14. On page 78, the EIR states that TCM 8 - airport ground access is not applicable. This is incorrect for improvements around the LAX area are noted in the description of the TCM. Furthermore the Green Line will also serve the LAX area, with implications toward meeting the goals described in this TCM. 32

Letter to Ms. Kendra Morries
Los Angeles County Congestion Management Program
September 11, 1992

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Component Four: The Land Use Program

In the summary of impact and mitigation measures (page S-3), the land use portion mentions that individual CMP projects may result in localized changes in land use which could lead to urban concentration or deconcentration or expansion, and therefore be inconsistent with local land or regional land use. The effect of the CMP on land use cannot be ascertained and there is no illustration, in this portion of the EIR or in the text, of the impacts of the CMP programs on land use. There is no logical connection between the increase in system capacity and the resulting increase in trip making and land use considerations. No mitigation measures are proposed except for stating that land use impact will need to be mitigated through interagency and interjurisdictional meetings and review of project EIR. On the basis of such statements, the finding of less than significant impact on land use after mitigation cannot be established.

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Growth Management (J/H), is not mentioned as one of the four TCM strategies of the 1989 RMP and as Measure 17 of the 1991 AQMP (pages 37, 38). On page 147, the employment figure quoted should be 8.9 not 5.9.

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SUMMARY
**1989 AIR QUALITY MANAGEMENT PLAN (AQMP) APPENDIX IV-G,
 WITH DUE DATES FROM THE 1991 AQMP, APPENDIX IV-E**

LOCAL GOVERNMENT CONTROL MEASURES TO BE IMPLEMENTED BY DECEMBER 31, 1992

CONTROL MEASURE/TITLE	IMPLEMENTATION ACTIVITY IN 1989 AQMP WITH (SPECIFIED AMENDMENTS IN 1991 AQMP)	DUE DATE IN 1991 AQMP
1.a. Alternative Work Weeks and Flextime	<p>Implement 10% work trip reduction program for local government employees.</p> <p>Adopt alternative work schedule ordinance to require 10% work trip reduction as a condition of business license or permit for new developments.</p> <p>Local government monitor progress, report to SCAG annually.</p>	<p>December 31, 1992</p> <p>December 31, 1992</p> <p>Annually</p>
1.b. Telecommunications	<p>Adopt program for telecommunications/work at home strategies to reduce local government employees work trips by 20%.</p> <p>Adopt telecommunications Trip Reduction Ordinance (TRO) reducing employee work trips by 20%.</p>	<p>December 31, 1992</p> <p>December 31, 1992</p>
2.a. Employer Rideshare & Transit Incentives	<p>Adopt ordinance to require trip-reduction plans for facilities with tenants employing more than 100 employees</p> <p>Adopt ordinances to require facilities employing 25-99 employees to disseminate information on trip reduction</p> <p>Evaluate effectiveness of reducing employee level threshold to 25+, if necessary, by July 1, 1993, expand Reg. XV to cover business with 25+ employees</p>	<p>December 31, 1992</p> <p>July 1, 1991</p> <p>July 1, 1992</p>
2.b. Parking Management (as appropriate, in next column intended to indicate local government to make choices from a menu of programs. See 1989 AQMP for complete list.)	<p>Local government adopt Air Elements to General Plans and/or adopt appropriate ordinance which will apply as appropriate to the following programs:</p> <p>Increase daytime parking fee</p> <p>Establish surcharge on parking for single occupant vehicles</p> <p>Eliminate peak-period onstreet parking</p> <p>Eliminate 100% employer subsidized parking</p>	<p>December 31, 1992</p>

SUMMARY
**1989 AIR QUALITY MANAGEMENT PLAN (AQMP) APPENDIX IV-G,
 WITH DUE DATES FROM THE 1991 AQMP, APPENDIX IV-E**

LOCAL GOVERNMENT CONTROL MEASURES TO BE IMPLEMENTED BY DECEMBER 31, 1992

CONTROL MEASURE/TITLE	IMPLEMENTATION ACTIVITY IN 1989 AQMP WITH (SPECIFIED AMENDMENT IN 1991 AQMP)	DUE DATE IN 1991 AQMP
2.b. Parking Management (con't)	Employer-sponsored preferential parking for ridesharers Residential parking zones permit programs	
2.d. Merchant Transportation Incentives	Adopt non-work trip reduction ordinances requiring merchants (large retail establishments) to offer customer mode-shift travel incentives	December 31, 1992
2.e. Auto Use Restrictions	Adopt air quality elements into General Plans. Provide enhanced transit performance and availability in auto-restricted zones.	December 31, 1992 No date
2.g. Transit Improvements	Those actions, facilities, programs, which will be constructed or completed under existing or present funding capabilities are in the "constrained program" (Tier D).	Biennial, RTIP, 1991-1992
3.a. Truck Dispatching, Rescheduling, & Rerouting	Adopt local Air Quality Elements in General Plans, including improved truck routing, delivery scheduling and shipping/receiving plans Adopt local ordinances/MOUs to facilitate improved truck routing and delivery scheduling	December 31, 1992 December 31, 1992
4. Traffic Flow Improvements	Local government implement signal synchronization and intersection channelization.	1989-1993
5. Nonrecurrent Congestion	Nonrecurrent congestion design and program improvements.	1989-1993
8. Airport Ground Access	Local government Airport Operators' rule or by January 1, 1992, SCAQMD adopt indirect source rule to reduce the number of air passenger auto trips generated by airports	January 1, 1991
11. Rail Consolidation to Reduce Grade Crossings	Local governments establish separate joint powers authority to develop consolidated corridor from Los Angeles to San Bernardino Port of Los Angeles and Long Beach and other agencies to obtain financing	January 1, 1993 December 31, 1992

SUMMARY
**1989 AIR QUALITY MANAGEMENT PLAN (AQMP) APPENDIX IV-G,
 WITH DUE DATES FROM THE 1991 AQMP, APPENDIX IV-E**

LOCAL GOVERNMENT CONTROL MEASURES TO BE IMPLEMENTED BY DECEMBER 31, 1992

CONTROL MEASURE/TITLE	IMPLEMENTATION ACTIVITY IN 1989 AQMP WITH (SPECIFIED AMENDMENT IN 1991 AQMP)	DUE DATE IN 1991 AQMP
12.a. Paved and Unpaved Roads and Parking Lots	Local governments develop a "clean streets" management program	December 31, 1992
<p>17. Growth Management (1991 AQMP)</p> <p>(Note, however, that no due dates in the 1991 AQMP for Measure 17 were sent forward to ARB and EPA as amendments to the 1989 AQMP because Measure 17 changed substantially in the 1991 AQMP; for example, the paragraphs in the next column were added.)</p>	<p>Local governments amend general plans, adopt ordinances and develop interregional agreements to attain growth management performance goals at the subregional level consistent with the Growth Management Plan.</p> <p>Local governments adopt resolution containing action plans which:</p> <ul style="list-style-type: none"> a. Clarify the work jurisdictions will commit to do in order to implement Measure 17. b. Demonstrate the local jurisdiction's commitment to amending its general plan, developing an implementing plan, and/or adopting ordinances by December 31, 1994, to implement Measure 17. <p>Local governments develop interregional agreements to attain growth management performance goals consistent with the Growth Management Plan (see Table I-1). Sanitation districts advise local jurisdictions in implementation of the growth management policy.</p> <p>Implementing jurisdictions must commit themselves to attain the goals stated above. It is assumed that:</p> <p style="padding-left: 40px;">Between now and December 31, 1994, 50% of the jurisdictions comprising 60% of the regional population and 60% of the regional employment will have demonstrated their commitment and</p> <p style="padding-left: 40px;">By December 31, 1997, 100% of the jurisdictions will have committed themselves to achieve the goals of this measure.</p>	<p>December 31, 1994</p> <p>December 31, 1992</p> <p>December 31, 1994</p>



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February 14, 1992

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Mr. Neil Peterson
Executive Director
Los Angeles County Transportation Commission
818 West Seventh Street, 11th Floor
Los Angeles, CA 90017

Dear Mr. Peterson:

Under Government Code Section 65089.2, SCAG is required to evaluate Congestion Management Programs for consistency with the Regional Transportation Plan, compatibility with other Congestion Management Programs in the region and consistency with SCAG's regional model and database. On December 5, 1991, SCAG's Executive Committee formally acted to defer its finding on the 1991 Los Angeles County Congestion Management Program until completion of the Environmental Impact Report. Since Government Code Section 65082(c) provides for up to a year extension to submit the CMP to the California Transportation Commission, the Executive Committee approved the 1992 STIP bid pot projects for submittal to the California Transportation Commission. Projects are included in the 1992 STIP contingent on SCAG's final determination of consistency and final adoption of the CMP by your Commission by December 1, 1992.

I would like to take this opportunity to commend you and your staff on your draft CMP. Development of this Program has required a tremendous amount of effort and local coordination on your part over the past year to ensure that the Program meets all of the statutory requirements. The comments provided here are intended to help you make the second year Program consistent with the Regional Transportation Plan and to improve coordination between the local and regional planning process.

Attached is the Executive Committee agenda attachment including the approved recommendations and more detailed comments on the CMP. Table 1 in the attachment shows how the Trip Reduction and Travel

Demand Management Element addresses the requirements adopted in the 1991 South Coast Air Quality Management Plan (AQMP). At a minimum, the eight measures listed in the table must be included in the CMP. The second year program must include a discussion of four measures- Nonwork Trips, Truck Program, Supplemental Development Standards, and Enhanced Regulation XV- as potential solutions to the county's congestion problems.

Table 2 shows how the transportation demand management ordinance addresses the requirements of the South Coast AQMP. While the CMP does not need to require each city or the county to incorporate these actions into the ordinance, it should fully discuss these requirements so that local governments can chose to implement them in a single ordinance to simplify efforts for both CMP and AQMP purposes.

The third table (Appendix A) shows how the CMP, as a whole, addresses SCAG's regional consistency and compatibility criteria. Briefly, our comments focus on seven CMP elements:

Transportation Demand Management: The model ordinance should be consistent with the requirements of the South Coast AQMP to simplify local implementation efforts. A complete discussion of all of the local government actions from Table 2 needs to be incorporated into next year's CMP. Growth management strategies are a required component of the Transportation Demand Management element and must be incorporated into the list of actions for the second year Program.

Deficiency Plan: The adopted 1991 AQMP calls for incorporation of Tier I transportation control measures in the core CMP and that the Deficiency Plan should implement measures above and beyond the AQMP measures or accelerate their implementation. Currently, there is significant overlap between your Deficiency Plan list and the AQMP control measures and it is not clear whether control measure implementation is accelerated.

Transit Standards: Transit standards have been established for line haul transit service only. And there are no standards for inter-county coordination. While the Program does establish a transit network for monitoring purposes, it does not identify funding for transit needs identified through the traffic impact analysis program. Next year's Program needs to incorporate a three-tier transit concept and show how the transit needs identified through the traffic impact analysis program would be funded either regionally or locally.

CMP Highway System: The CMP Highway System needs to connect with the System in neighboring counties. Holt Avenue, Mission Blvd. and Grand Avenue are currently included in the San Bernardino County's Draft CMP. San Bernardino County has also decided to do an Environmental Impact Report for their CMP which should provide



adequate time to determine whether these arterials are part of the CMP Highway System. A joint decision needs to be made with the San Bernardino Associated Governments to add or delete these highway segments from both CMP Highway Systems.

Capital Improvement Program: Projects included in the Capital Improvement Program need to be described in sufficient detail to determine whether the design concept and scope is consistent with the Regional Mobility Plan. Two projects in the Capital Improvement Program, Rte 30 and Rte 71, do not have HOV lanes in the description for the project. Both the Regional Mobility Plan and the 1991 South Coast AQMP contain policies which require that priority be given to transit and ridesharing facilities in the Regional Transportation Improvement Program. Therefore, these projects are inconsistent with the Regional Mobility Plan.

CMP Model/Database: The CMP needs to describe how the model and database would be developed to ensure consistency with SCAG's regional model and database.

Reporting/Monitoring: As part of their adopting action for the 1991 South Coast AQMP, both SCAG and the South Coast AQMD approved a policy that requires the CMA's to monitor Transportation Control Measure implementation for air quality conformity purposes. The CMP needs to describe how TCM implementation efforts will be reported through the CMP process.

To make a final determination of consistency, the modeling/database information and response to our comments need to be submitted to SCAG staff no later than July 1, 1992, with your submittal of the second year CMP.

Upon the recommendation of the AB 1246 Committee, we will review the CMP criteria with your staff over the next few months. A CMP Technical Working Group has been formed consisting of CMP staff for each of the five Transportation Commissions and the SCAG CMP coordinator. Brad McAllester represents your agency in these meetings. In addition to reviewing the criteria, this group will also discuss improved inter-county coordination and compatibility, potential implementation solutions, implications of the 1991 Intermodal Surface Transportation Efficiency Act and a legislative agenda to improve the CMP process. Recommendations from this group will be brought back to the AB 1246 Committee for discussion and possible action.



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We look forward to working with you and your staff to ensure that the CMP process is successfully implemented. If you have any questions about our comments or require additional information, please contact Debbie Whitmore at (213) 236-1931. Your continued support and involvement on regional issues is greatly appreciated.

Sincerely,



MARK PISANO
Executive Director

MP/jg/dw

Encl: December 5 Executive Committee Attachment



M E M O R A N D U M

November 23, 1991

TO: Executive Committee

**FROM: Debbie Whitmore, Principal
Highway and HOV Program**

**RE: Regional Consistency Finding for the 1991 Congestion
Management Programs**

ISSUE

SCAG is required under statute to determine whether the Congestion Management Programs (CMPs) are consistent with the Regional Plans, compatible with other CMPs in the region, and consistent with SCAG's model and databases. Upon finding the CMPs consistent, SCAG is required to incorporate the CMPs into the 1992 Regional Mobility Element and the 1992-98 Regional Transportation Improvement Program. By providing an expanded forum for discussion of the goals, programs, and strategies in the Regional Plans, the CMP will play an extremely important role in gaining local government support for implementation of the transportation control measures in the Air Quality Management Plans which is necessary to protect future federal funding for transportation.

RECOMMENDATIONS

In the first year of the program, the Congestion Management Programs submitted to SCAG have not had time to fully address the requirements of SCAG's adopted regional consistency and compatibility criteria. During the second year program, the Congestion Management Agencies will have time to address regional consistency issues and, in the case of Los Angeles and San Bernardino counties, to complete Environmental Impact Reports. Due to the lack of adequate information and the fact that two of the five CMPs are not final, staff feel that it is premature to make a final determination of consistency and compatibility for the 1991 CMPs.

Recommendation 1: CONSISTENCY FINDING

Staff recommends that an "interim" consistency finding be given for:

Orange County
Riverside County
Ventura County

And that a consistency finding be deferred until completion of the CMP Environmental Impact Report for:

Los Angeles County
San Bernardino County

Recommendation 2: COMMENTS ON THE CONGESTION MANAGEMENT PROGRAMS

Staff recommends that the comments on the individual CMPs summarized in the attachment and discussed in greater detail in Appendix A be forwarded to the Congestion Management Agencies. And, further, that staff communicate in the CMP consistency finding that modeling/database information must be provided to SCAG and these comments addressed by July 1, 1992, in order to make a positive finding of consistency for the second year CMP.

Recommendation 3: INCORPORATE CMP ISSUES INTO THE AB 1246 PROCESS

AB 1246 which established the four County Transportation Commissions also established a regional process for addressing inter-county issues to be coordinated by SCAG. Staff recommends that the AB 1246 process be used to address inter-county issues that result from the implementation of the CMP and to improve inter-county compatibility of the CMPs.

Recommendation 4: DISTRIBUTE SCAG REGIONAL CONSISTENCY CRITERIA AND COMMENTS ON CMPS TO CITY MANAGERS AND PLANNING DIRECTORS

Both the Transportation and Communication Committee and the Planning Director's Committee recommend that SCAG staff be directed to distribute the regional consistency and compatibility criteria and the comments on the CMP's to the cities and counties in an effort to support the Congestion Management Agencies efforts to incorporate these recommendations into the second year program.

POLICY COMMITTEE ACTIONS

Transportation and Communication Committee: Supported the three staff recommendations and added recommendation #4.

Community, Economic and Human Development Committee: Supported the three staff recommendations.

Planning Directors Committee: Supported the three staff recommendations and recommendation #4 added by the Transportation and Communication Committee.

Energy and Environment Committee: The committee did not meet.

Local Assistance and Compliance Committee: Supported the three staff recommendations and added that staff be directed to stress the role of transportation control measure implementation in securing funding for future Regional Transportation Improvement Programs.

BACKGROUND

With the passage of the Transportation Blueprint Package (Proposition 111), five counties in the SCAG region were required to prepare and adopt county Congestion Management Programs (CMPs). The CMPs include five elements:

CMP Highway System and Level of Service Standard
Trip Reduction and Travel Demand Management Element
Transit Frequency, Routing and Coordination Standards
Land Use Impact Analysis Program
Seven-Year Capital Improvement Program

Cities and counties are required to establish a monitoring program to determine that the level of service standards are met and, where the system is currently operating below the standard, to prevent it from getting any worse. If the standard cannot be met, the city or county is required to prepare a Deficiency Plan describing how conditions will be improved in the future either by improving the deficient segment or by implementing a regional improvement project selected from a list approved by the appropriate Air District.

The objective of the program is to both create a stronger linkage between land use and transportation and improve coordination between local, regional and state transportation planning and programming efforts. To ensure that the CMPs are coordinated with regional planning efforts, SCAG is required to review the CMPs and make a determination that the CMPs are consistent with the regional transportation plan, compatible with other CMPs in the region, and consistent with the regional model and database.

On April 4, SCAG's Executive Committee adopted regional consistency and compatibility criteria for this consistency finding. These criteria were developed through a cooperative process with the County Transportation Commissions, Caltrans, and local government.

CMP EVALUATION

A matrix comparing the CMP provisions with SCAG's regional consistency and compatibility requirements is provided in Appendix A. The adopted criteria are provided in Appendix B.

The staff comments fall into six general categories:

- o Implementation of the Transportation Control Measures from the AQMP:

Criteria 1 of SCAG's Regional Consistency and Compatibility Criteria require that the CMP support and encourage adoption of the RMP/AQMP measures. In addition, the 1991 South Coast AQMP requires that specific transportation control measures be included in the core CMP and that the Deficiency Plan list include measures that go above and beyond the AQMP control measures. For the South Coast Air Basin, a comparison of the

CMPs and the transportation control measure requirements is provided in Table 1. As provided in San Bernardino County's CMP, a discussion of the RMP/AQMP requirements and a policy that the appropriate agencies implement these measures should be included in the year two CMP. In addition, as part of the adopting action for the 1991 AQMP, the conformity procedures to be revised under the 1990 Clean Air Act Amendments will include a requirement that the County Transportation Commissions provide documentation on the implementation of transportation control measures as part of the CMP process.

o Growth Management Policies:

Criteria 1 also requires that the CMP must be consistent with the growth management measures from the RMP and the appropriate AQMP. Orange and Los Angeles counties have not incorporated this strategy in their Travel Demand Management Element as required in the statute. Orange County references "Balanced Development" in the Deficiency Plan.

o Travel Demand Management:

Travel demand management is a critical element of the 1989 RMP. Only with a 30% reduction in travel demand will the region be able to achieve the mobility and, perhaps more critical today, air quality goals. The analysis for the 1989 RMP demonstrated that even with a increase in revenues substantially above what is projected over the next twenty years, mobility and air quality goals would not be achieved without an aggressive travel demand management program. With the exception of San Bernardino County, the CMPs in the South Coast Air Basin are extremely weak in this area (see Table 2). In Ventura County, the CMP relies heavily on the Ventura County's Rule 210. In this case, the cities and counties should be required to be more actively involved in the implementation of the APCD rule, particularly as the threshold drops to employers of 25 or more.

The CMPs are primarily oriented toward facility improvements and demand management requirements for new development, not existing employers. There is a general tendency to take a reactive posture toward demand management, waiting until a deficiency occurs before requiring local government, employers and others to implement these measures. Not only is this inconsistent with the Regional Plans and the South Coast Air Basin requirements in the 1991 AQMP, but it will almost certainly lead to fragmented implementation of demand management strategies. Research has shown that a full commitment to a comprehensive demand management program is necessary to effect the tremendous change in travel behavior called for in the RMP.

o Transit Standards:

The RMP calls for implementation of a three-tier transit system for line-haul, feeder, and local circulation. Riverside, San Bernardino and Ventura counties have done an excellent job of developing standards for the three-tier system and addressing inter-county coordination issues as well as coordination within the county between transit operators. Los Angeles County's CMP emphasizes the line-haul transit system, does not address inter-county coordination, and does not establish a clear nexus between funding priorities and the identification of transit needs in the traffic impact analysis program. Orange County has relied entirely on the Short-Range Transit Program and does not contain transit standards.

o RMP Performance Goals:

To provide flexibility to the cities and counties in developing the CMP, Criteria 2 calls for specific mobility performance goals to be demonstrated by the CMP. It also includes criteria for the evaluation of the CMP model and database. In the first year of the program, the County Transportation Commissions did not do modeling for the CMP. Without this information, it is not possible to judge whether the CMP is consistent with the mobility goals of the RMP.

o CMP Highway System:

Criteria 3 requires that the CMP Highway System connect with the system in neighboring counties. There are four locations where the CMP Highway Systems do not connect at the county boundaries:

San Bernardino-Los Angeles:
Holt Avenue
Mission Blvd.
Grand Avenue

San Bernardino-Riverside:
Reche Canyon (pending the outcome of the San Timeteo Canyon Corridor Study)

Ventura, San Bernardino and Orange counties have prepared CMP Highway Systems that are comparable to the System of Regional Significance in the 1989 RMP which is currently being refined for the 1992 Regional Mobility Element.

CMP-RELATED REGIONAL ACTIVITIES

Technical Coordination

SCAG staff have scheduled a meeting on November 20 with the CMP staff from the County Transportation Commissions to review these findings, discuss how to address the impact of land use development across county boundaries, and establish of forum to improve inter-county compatibility of the CMPs. At that time, a regular schedule of meetings to address these issues will be determined.

Regional Policy Coordination

The CMP offers a tremendous opportunity to address growth, mobility and air quality issues through a comprehensive, regional implementation process. Given the importance of this opportunity to the region, SCAG staff believe that it is important to discuss and resolve CMP issues in a policy level discussion. Therefore, we recommend that the CMP be included as a regular topic for future AB 1246 meetings.

Modeling and Database Development

SCAG staff have scheduled on-going meetings of the Regional Model Task Force to address issues on modeling consistency. As part of the 1992 Regional Comprehensive Plan, database development for the Plan is being coordinated with the County Transportation Commissions through the CMP process.

APPENDIX A
Matrix Comparison

CMP MATRIX COMPARISON

SCAG CRITERIA	LOS ANGELES	ORANGE	RIVERSIDE	SAN BERNARDINO	VENTURA
<p>1: Consistency with the 1989 Regional Mobility Plan and the Air Quality Management Plan.</p> <p>o Growth Management: Encourage land use development consistent with the 1989 OMP to promote balance between jobs and housing to reduce vehicle miles of travel.</p> <p>CMP ELEMENTS: Traffic Impact Analysis, Trip Reduction and Travel Demand Management, CMP Model and Database, and Deficiency Plan.</p>	<p>No policy addressing J/H Balance in either the <u>Travel Demand Management</u> or <u>Deficiency Plan</u> Elements.</p> <p>Model/Database to be developed consistent with SCAG's regional planning process. CMP needs to explain how this will be covered.</p> <p>Traffic Impact Analysis: Threshold - 150 peak hr trips, each direction. Impact Area: 5 miles radius.</p>	<p>No policy on J/H Balance in the <u>Travel Demand Management</u> Element.</p> <p>"Balanced Development Plans" called for in the <u>Deficiency Plan</u>.</p> <p>Model/Database to be developed cooperatively with SCAG including a description of the proposed procedure.</p> <p>Traffic Impact Analysis: Threshold: 2400 ADT or 1600 ADT if in close proximity to CMP Highway System.</p>	<p>"J/H Interchange Program" to improve job/housing balance contained in <u>Travel Demand Management</u> Element.</p> <p>Model/Database to be cooperatively developed with SCAG. Strong linkage with SCAG update process.</p> <p>Traffic Impact Analysis: Threshold: 200 peak hr trips or 2000 ADT. TUMP program identified as an alternative implementation mechanism for CMP (include higher level of service standards).</p>	<p>Comprehensive list of land use strategies in <u>Travel Demand Management</u> Element includes: Mixed Use Development Development Design Standards Increased Density at Transit Centers</p> <p>Policy to implement AQMP transportation control measures in <u>Travel Demand Management</u> Element.</p> <p>Model/Database to be cooperatively developed with SCAG. Strong linkage with SCAG update process.</p> <p>Traffic Impact Analysis: Threshold: 50+ peak hr trips, Arterials 100+ peak hr trips, Freeways Impact Area: Where Impact is greater than 5% of LOS on the CMP Highway System.</p>	<p>AQMP development design standards included in the <u>Travel Demand Management</u> Element.</p> <p>Working with SCAG to develop consistent <u>Model/Database</u>.</p> <p>Traffic Impact Analysis: Threshold: 200 peak hr trips, each direction.</p>

SCAG CRITERIA	LOS ANGELES	ORANGE	RIVERSIDE	SAN BERNARDINO	VENTURA
<p>1: Consistency with RMP. (Cont'd)</p> <ul style="list-style-type: none"> • Demand Management: 10% Person Trip Reduction through Alternative Work Weeks/Patterns 20% Person Trip Reduction through Telecommuting and Work-at-Home Vehicle Trip Reduction Ordinances (regional average vehicle ridership 2.1 persons per vehicle for home-to-work trip) Parking Management Vehicle Purchase Incentives Mass Transit Incentives Auto Use Restrictions Non-Motorized Transportation CMP ELEMENTS: Travel Demand Management and Deficiency Plan. 	<p><u>Travel Demand Management Element:</u></p> <p>Regulation XV to apply to all employers.</p> <p>Local ordinances applying to new development required. Minimum requirements; performance standards not required; possible optional.</p> <p>RMP/AQMP measures contained in the Deficiency Plan list.</p>	<p><u>Travel Demand Management Element:</u></p> <p>References Reg. XV.</p> <p>Refers to AQMP control measures.</p> <p>Local ordinances applying to new development required. Minimum requirements; performance standards not required; possible optional.</p> <p>Deficiency Plan list under development. Preliminary list includes RMP AQMP measures.</p>	<p><u>Travel Demand Management Element:</u></p> <p>No reference to Reg. XV.</p> <p>Local ordinances applying to new development required. Minimum requirements; performance standards not required; possible optional.</p> <p>Deficiency Plan list under development.</p>	<p><u>Travel Demand Management Element:</u></p> <p>Comprehensive list of RMP/AQMP trip reduction strategies.</p> <p>Policy to implement AQMP transportation control measures.</p> <p>Deficiency Plan to contain improvements above and beyond 1991 AQMP (list under development).</p>	<p><u>Travel Demand Management Element:</u></p> <p>Includes Rule 210 implementation.</p> <p>Comprehensive list of RMP/AQMP control measures.</p> <p>Ordinances/goals for new development optional, not required.</p> <p>Deficiency Plan includes comprehensive list of trip reduction strategies.</p>

SCAG CRITERIA	LOS ANGELES	ORANGE	RIVERSIDE	SAN BERNARDINO	VENTURA
<p>I: Consistency with RMT. (Cont'd)</p> <ul style="list-style-type: none"> o Transportation Systems Management: <ul style="list-style-type: none"> Implement 8,000 synchronized signals Implement 600 Ramp Meters and HOV By-Pass Lanes Implement 500 local intersection improvements Expand incident response programs <p>COMPLEMENTS: Capital Improvement Program and Deficiency Plan.</p>	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> 4 Intersection Improvement projects totaling \$15 million. 17 Signal Synchronization projects totaling \$548 million (includes LA County-wide Signalization and LA City ATSAC). <p>Deficiency Plan:</p> <ul style="list-style-type: none"> -Incident Response Program -Park-and-Ride Lots -Signal Synchronization -Arterial HOV/Traustways 	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> Approx. 90 Intersection Improvement projects totaling \$2.3 billion. Approx. 20 Signal Synchronization projects totaling \$35.6 million. Five (5) Caltrans Traffic Operations System projects totaling \$4 million. <p>Deficiency Plan:</p> <ul style="list-style-type: none"> -Congestion Pricing -Characterization and Traffic Routing 	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> Same as 1991/97 RTP <p>Deficiency Plan: Not under development.</p>	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> Approx. 100 Intersection Improvement projects totaling \$13.4 million. 81x (8) Signal Synchronization projects totaling \$900,000. <p>Deficiency Plan: Not under development. Will include operational improvements such as traffic signalization and characterizations.</p>	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> 24 Intersection Improvement projects totaling \$3.2 million. 34 Signal Synchronization projects totaling \$4.5 million. Two (2) Caltrans Traffic Operations System projects totaling \$3.7 million. <p>Deficiency Plan: Includes operational improvements and signal synchronization.</p>

SCAG CRITERIA	LOS ANGELES	ORANGE	RIVERSIDE	SAN BERNARDINO	VENTURA
<p>1: Consistency with RMP. (Cont'd)</p> <p>o Transit Improvements:</p> <ul style="list-style-type: none"> -Implement Three-tier Transit System -Achieve 19% transit share of home-to-work trips by 2010 -Implement Inter-City and Regional Commuter Rail Services <p>CMR ELEMENTS: Capital Improvement Program, Transit Standards, Deficiency Plan, and Transit Demand Management.</p>	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> -Local Bus Service Expansion -LRT expansion -Metro Red/Orange Lines -Three (3) commuter rail lines <p>Transit Standards:</p> <ul style="list-style-type: none"> -Transit Network for monitoring. -Standards for bus head track, SMT. -Linked to SRTP. -No inter-county coordination standards. -Requires coordination of land use projects with transit operations. <p>Deficiency Plan:</p> <ul style="list-style-type: none"> -Bus Capital Improvements -Rail Improvements -LRT -Metro Rail 	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> -I-405/SR-55 Transitway -Additional 20 OCTD buses -Commuter Rail Services (San Juan Capistrano to LA) <p>Transit Standards:</p> <ul style="list-style-type: none"> -Same as SRTP. -Discusses SCAG's role in determining consistency of SRTP with the RMP. <p>Deficiency Plan:</p> <ul style="list-style-type: none"> -Transit Service Improvements 	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> -Same as 1991/97 RTP. <p>Transit Standards:</p> <ul style="list-style-type: none"> -Standards for Three-Tier Transit System. -Linked to SRTP. -Procedures to identify transit impacts of new development. -Provides for coordination between transit operators. -References county Commuter Rail Study and future study for Coachella Valley. <p>Deficiency Plan under development.</p>	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> -San Bernardino-LA Commuter Rail -San Bernardino/Riverside Commuter Rail -Transit agency list under development. <p>Transit Standards:</p> <ul style="list-style-type: none"> -Strong linkage to RMP/QMP transit/TDM measures. -Strong emphasis on obtaining air quality improvements. -Policies to encourage land use patterns to support transit. -Element/Standards tied to SCAG transit performance indicators. -Standards for Three-Tier Transit system phased over 20-year planning horizon. -Emphasizes congested corridors and activity centers. -Stresses inter-county coordination (Regional Transit Plan). <p>Deficiency Plan under development.</p>	<p>Capital Improvement Programs:</p> <ul style="list-style-type: none"> -Expansion of public van and bus fleet -LA-Ventura Commuter Rail <p>Transit Standards:</p> <ul style="list-style-type: none"> -Linked to SRTP for short-range implementation. -Standards for Three-Tier Transit System. -Emphasizes coordination between operators and counties. -Calls for county- and region-wide transit pass. <p>Deficiency Plan:</p> <ul style="list-style-type: none"> -New Transit Service -Development Standards to support Transit -Pelt-and-Ride Lane -Transit Centers

SCAG CRITERIA	LOS ANGELES	ORANGE	RIVERSIDE	SAN BERNARDINO	VENTURA
<p>I: Consistency with RMP. (Cont'd)</p> <p>• Highway/HOV Improvements:</p> <p>Add 1,140 lane miles mixed-flow</p> <p>Add 1,246 lane miles HOV</p> <p>Meet local street and road needs</p> <p>CMP ELEMENTS: Capital Improvement Program and Deficiency Plan.</p>	<p>Capital Improvement Programs:</p> <p>Approx. 172 lane miles mixed-flow.</p> <p>Approx. 136 lane miles HOV.</p> <p>INCONSISTENT PROJECTS</p> <p>Rte 30 - must include HOV</p> <p>Rte 71 - must include HOV</p> <p>Local Street and Road Needs:</p> <p>Approx. 22 Street Improvement projects totaling \$378 million.</p>	<p>Capital Improvement Programs:</p> <p>Approx. 474 lane miles mixed-flow.</p> <p>Approx. 236 lane miles HOV.</p> <p>INCONSISTENT PROJECTS</p> <p>I-5 from SR-91 to LA County line - 4 mixed flow lanes, 2 in RMP.</p> <p>SR-57 Extension from I-5 to SR-73 - must include HOV.</p> <p>SR-57 to Orange County Line - must include HOV.</p> <p>Local Street and Road Needs:</p> <p>Approx. 70 Street Improvement projects totaling \$2 billion.</p>	<p>Capital Improvement Programs:</p> <p>Approx. 120 lane miles mixed-flow.</p> <p>Approx. 61 lane miles HOV.</p> <p>INCONSISTENT PROJECTS</p> <p>Not applicable (projects from 1991/97 RTIP).</p> <p>Local Street and Road Needs:</p> <p>Not provided.</p>	<p>Capital Improvement Programs:</p> <p>Approx. 46 lane miles mixed-flow.</p> <p>Approx. 20 lane miles HOV.</p> <p>INCONSISTENT PROJECTS</p> <p>I-215 between I-10 and SR-46 - projects not described in sufficient detail</p> <p>Local Street and Road Needs:</p> <p>Approx. 50 Street Improvement projects totaling \$799 million.</p>	<p>Capital Improvement Programs:</p> <p>Approx. 33 lane miles mixed-flow.</p> <p>INCONSISTENT PROJECTS</p> <p>None.</p> <p>Local Street and Road Needs:</p> <p>Approx. 22 Street Improvement projects totaling \$39 million.</p>

SCAG CRITERIA	LOS ANGELES	ORANGE	RIVERSIDE	SAN BERNARDINO	VENTURA
<p>2: Consistency with RMP Mobility Indicators and Model/Database.</p> <ul style="list-style-type: none"> Performance Goals: <ul style="list-style-type: none"> 1994 Levels of Mobility: <ul style="list-style-type: none"> Progress is compared with performance indicators for the year 2000: Vehicle Miles of Travel (VMT), Vehicle Hours of Travel (VHT), Vehicle Trips, Person Trips, Transit Mode Split for Home-To-Work Trips, and Average Vehicle Occupancy (AVO). Model Consistency <ul style="list-style-type: none"> Consistent planning horizon Compatible analysis zones Production and Attraction Tables for three trip types Modeling network contains System of Regional Significance Database Consistency <ul style="list-style-type: none"> Either using SCAG database or a locally developed database approved by SCAG. CMP ELEMENTS: CMP Model/Database. 	<p>LOS Standard: Minimum LOS B on the CMP Highway System.</p> <p>Mobility Indicators not available; no modeling in first year.</p> <p>Model: under development.</p> <p>CMP model task force with SCAG representation to ensure consistency.</p> <p>Database: under development.</p>	<p>LOS Standard: Minimum LOS B on the CMP Highway System.</p> <p>Mobility Indicators not available; no modeling in first year.</p> <p>Model: OCTAM II.</p> <p>CMP model task force with SCAG representation to ensure consistency.</p> <p>Database: under development.</p> <p>Progress joint SCAG/O.C. database development.</p>	<p>LOS Standard: Minimum LOS B on the CMP Highway System.</p> <p>Mobility Indicators not available; no modeling in first year.</p> <p>TUMF areas establish higher LOS standard.</p> <p>Model: RIVSAN developed jointly by SCAG, SANBAO and RCTC.</p> <p>Local model consistency guidelines prepared jointly with SCAG.</p> <p>Database: under development as part of SCAG database update effort.</p> <p>Provides criteria whereby cities must notify SCAG of major revisions to the regional database.</p>	<p>LOS Standard: Minimum LOS B on the CMP Highway System.</p> <p>Mobility Indicators not available; no modeling in first year.</p> <p>Model: RIVSAN developed jointly with SCAG.</p> <p>Database: under development as part of SCAG update process.</p>	<p>LOS Standard: Minimum LOS D on the CMP Highway System.</p> <p>Mobility Indicators not available; no modeling in first year.</p> <p>Model: under development.</p> <p>Working with SCAG to ensure model consistency.</p> <p>Database: under development.</p>

SCAG CRITERIA	LOS ANGELES	ORANGE	RIVERSIDE	SAN BERNARDINO	VENTURA
<p>3: Inter-County Compatibility</p> <ul style="list-style-type: none"> Level of Service Method must be consistent with the Highway Capacity Manual CMP Highway System must connect with System in neighboring counties 	<p>LOS Methodology:</p> <p>ICU - Arterial HCM - Freeways</p>	<p>LOS Methodology:</p> <p>ICU - Arterial HCM - Freeways and freeways</p>	<p>LOS Methodology:</p> <p>Highway Capacity Manual (HCM)</p>	<p>LOS Methodology:</p> <p>ICU - Arterial HCM - Freeways and non-signalized intersections</p>	<p>LOS Methodology:</p> <p>ICU - Arterial signalized intersections HCM - Freeways and non-signalized intersections</p>
<p>ENVIRONMENTAL DOCUMENT:</p>	<p>CMP Highway System:</p> <p>Interstate State Highways Few Principal Arterials</p> <p>INCONSISTENT WITH NEIGHBOR COUNTY:</p> <p>San Bernardino: Holt Avenue Mission Blvd. Grand Avenue</p> <p>ENVIRONMENTAL IMPACT REPORT</p>	<p>CMP Highway System:</p> <p>Interstate State Highways Superstreets</p> <p>INCONSISTENT WITH NEIGHBOR COUNTY:</p> <p>None.</p> <p>ENVIRONMENTAL IMPACT REPORT</p>	<p>CMP Highway System:</p> <p>Interstate State Highways Arterials that satisfy criteria</p> <p>INCONSISTENT WITH NEIGHBOR COUNTY:</p> <p>San Bernardino: Rocha Canyon (pending completion of San Timoteo Canyon Corridor Study)</p> <p>ENVIRONMENTAL IMPACT REPORT</p>	<p>CMP Highway System:</p> <p>Interstate State Highways Representative Principal Arterial Network</p> <p>INCONSISTENT WITH NEIGHBOR COUNTY:</p> <p>Los Angeles Holt Avenue Mission Blvd. Grand Avenue Beverly Hills Rocha Canyon</p> <p>ENVIRONMENTAL IMPACT REPORT</p>	<p>CMP Highway System:</p> <p>Interstate State Highways Representative Principal Arterial Network</p> <p>INCONSISTENT WITH NEIGHBOR COUNTY:</p> <p>None.</p> <p>ENVIRONMENTAL IMPACT REPORT</p>

Table 1

SOUTH COAST AIR BASIN

All CMP elements must be consistent with the AQMP. The AQMP has listed the following control measures that, at a minimum, should be included in the Trip Reduction and Transportation Demand Management Elements:

Control Measure	Los Angeles	Orange	Riverside	San Bernardino
CM-H-04 Nonwork Trips				X
CM-H-06 Truck Program				X
CM-H-03 Supplemental Development Standards				X
CM-H-05 Enhanced Regulation XV				X
CM-2.b Parking Management	X	X	X	X
CM-2.g Transit Improvements	X	X	X	X
CM-4 Traffic Flow Improvements	X	*	**	X
CM-2.f High Occupancy Vehicle Lanes	X	*	X	X

* Contained in Capital Improvement Program and Deficiency Plans.

** Incorporates 1991 AQMP CMP discussion by reference.

SCAG CRITERIA	LOS ANGELES	ORANGE	RIVERSIDE	SAN BERNARDINO	VENTURA
<p>OTHER COMMENTS:</p>	<p>County-wide mitigation for regional and system-wide impacts.</p> <p>Deficiency Plan to go beyond 1991 AQMP measures (pg 51); however, Deficiency Plan list includes the transportation control measures.</p> <p>Capital Improvement Program section needs to address Regional TTP process and the role of transportation control measure implementation in the conformity process.</p> <p>Conformity process will require CMA to document implementation of transportation control measures. CMP needs to describe how this will be achieved.</p> <p>While transit impacts are required to be assessed for land use projects, funding priorities are established for line-haul, not local, transit needs.</p>	<p>Litigation between transit students, travel demand management, Deficiency Plan, and Traffic Impact Analysis discuss needs to be addressed.</p> <p>Capital Improvement Program section needs to discuss role of transportation control measures implementation in the conformity process.</p> <p>Conformity process will require CMA to document implementation of transportation control measures. CMP needs to describe how this will be achieved.</p> <p>CMP refers to Measure M implementation. Two processes need to be defined.</p> <p>Deficiency Plan and land use coordination to be further refined in Year 2 CMP.</p> <p>Background documents for CMP establish linkages with RMP/AQMP which should be incorporated into the CMP.</p>	<p>Capital Improvement Program section needs to discuss role of transportation control implementation in the conformity process.</p> <p>Conformity process will require CMA to document implementation of transportation control measures. CMP needs to describe how this will be achieved.</p> <p>CMP failed to existing Coastella Valley TUMP program. Propose similar process for Western Riverside County. TUMP establishes higher level of service standard than CMP.</p>	<p>Emphasize trip reduction strategies over capital investment in Deficiency Plan process.</p> <p>Comprehensive transportation plan and program. Emphasize role of transportation control measure implementation in the Regional TTP process.</p> <p>Conformity process will require CMA to document implementation of transportation control measures. CMP needs to describe how this will be achieved.</p>	<p>County-wide CMP needed to be developed with Ventura County APCD to perform air quality analysis.</p> <p>Capital Improvement Program section includes discussion of Regional TTP and conformity process.</p> <p>While TDM element is comprehensive, there needs to be more direct involvement by cities in the implementation of Rule 210. For example, critical support for TMA's provisions for bicycle transportation. TDM evidence is optional, not required.</p>

Table 2

SOUTH COAST AIR BASIN

**CONGESTION MANAGEMENT PROGRAM
TRANSPORTATION DEMAND MANAGEMENT ORDINANCE
IMPLEMENTATION OF AIR QUALITY MANAGEMENT PLAN CONTROL MEASURES**

Action	Los Angeles	Orange	Riverside
Implement telecommuting centers by 12/31/93	OPT		OPT
Reduce 12% of work trips by 12/31/99			
Reduce local government employee trips by 12/31/92	OPT		
Implement telecommuting policy 12/31/94	OPT		OPT
Adopt ordinance for multiple facility operations by 12/31/94			
Adopt non-work trip reduction ordinance for large retail establishments by 12/31/92			
Adopt ordinance for special event centers by 12/31/93			
Include bicycle routes in General Plan by 12/31/94			
Require parking spaces, showers, lockers for bicycles in major new facilities by 12/31/93	OPT	X	OPT
Adopt ordinance to require trip reduction plans for employers of 25+ by 12/31/92	X*	X*	X*
Conduct assessments and adopt air quality elements 12/31/92			

* Ordinance applicable to new development, not existing employers.

Table 1

SOUTH COAST AIR BASIN

All CMP elements must be consistent with the AQMP. The AQMP has listed the following control measures that, at a minimum, should be included in the Trip Reduction and Transportation Demand Management Elements:

Control Measure	Los Angeles	Orange	Riverside	San Bernardino
CM-H-04 Nonwork Trips				X
CM-H-06 Truck Program				X
CM-H-03 Supplemental Development Standards				X
CM-H-05 Enhanced Regulation XV				X
CM-2.b Parking Management	X	X	X	X
CM-2.g Transit Improvements	X	X	X	X
CM-4 Traffic Flow Improvements	X	*	**	X
CM-2.f High Occupancy Vehicle Lanes	X	*	X	X

* Contained in Capital Improvement Program and Deficiency Plans.
 ** Incorporates 1991 AQMP CMP discussion by reference.

Table 2

SOUTH COAST AIR BASIN

CONGESTION MANAGEMENT PROGRAM
 TRANSPORTATION DEMAND MANAGEMENT ORDINANCE
 IMPLEMENTATION OF AIR QUALITY MANAGEMENT PLAN CONTROL MEASURES

Measures	Los Angeles	Orange	Riverside
Implement telecommuting incentives by 12/31/93	OPT		OPT
Reduce 12% of work trips by 12/31/99			
Reduce local government employee trips by 12/31/92	OPT		
Implement telecommuting policy 12/31/94	OPT		OPT
Adopt ordinance for multiple facility operations by 12/31/94			
Adopt non-work trip reduction ordinance for large retail establishments by 12/31/92			
Adopt ordinance for special event centers by 12/31/93			
Include bicycle routes in General Plan by 12/31/94			
Provide parking spaces, showers, lockers for bicycles in major work facilities by 12/31/93	OPT	X	OPT
Adopt ordinance to require trip reduction plans for employers 25- by 12/31/92	X	X	X
Conduct assessments and adopt air quality elements 12/31/92			

Ordinance applicable to new development, not existing employers.

Final
April 4, 1991

**Southern California Association of Governments'
Regional Consistency and Compatibility Criteria for CMPs**

Changes to the Government Code, enacted with the passage of Proposition 111 in June 1990, require SCAG to perform the following evaluations for the Congestion Management Programs (CMPs) developed within the region:

- o consistency between the countywide model/databases and SCAG's regional model and databases;
- o consistency with the regional transportation plans;
- o compatibility with the other CMPs developed within the region; and
- o incorporation of the CMP into the Regional Transportation Improvement Program (RTIP) and the action element of the regional transportation plan, SCAG's Regional Mobility Plan or RMP.

According to the California Government Code, Section 11349, "consistency means being in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or other provisions of law". For purposes of this document, consistency would be applied as it relates to the regional transportation plans and the regional model and databases.

This document outlines the process and criteria that will be used in making these evaluations. This is a "working" document which may be updated periodically to address issues as they arise and in response to various State and federal mandates.

THE EVALUATION PROCESS

The CMP must be evaluated to determine that it is consistent with the Regional Mobility Plan (RMP). Since the RMP incorporates elements of the the Regional Growth Management Plan (GMP) and the Air Quality Management Plans (AQMPs) for each air basin in the region, these elements must also be included in this evaluation.

It should be noted that this process needs to acknowledge the air quality conformity requirements for the RTIP. Each county transportation commission is responsible for evaluating their respective county TIP using the appropriate conformity procedures for projects, programs and plans. SCAG, as the designated metropolitan planning organization (MPO), is responsible for the full conformity finding on the RTIP.

The evaluation consists of three parts:

Part 1: The CMP must be consistent with the actions and programs pertaining to growth management, transportation demand management, transportation systems management, and facilities development contained in the RMP and the appropriate AQMP.

Note: In the case that the Congestion Management Agency (CMA) is not an implementing agency¹ for an RMP action, the following apply:

- 1) CMP guidelines must support and encourage adoption of these measures by the appropriate agencies, and
- 2) the CMP database/modeling must be consistent with SCAG's regional model and database (see Part 2).

Part 2: The CMP must demonstrate progress toward the regional mobility targets contained in the RMP. To satisfy this requirement, the countywide modeling for the CMP must be consistent with SCAG's CMP planning horizon forecasts for the following indicators:

- a. Vehicle miles of travel, average trip length, and vehicle hours of travel must be maintained or reduced.
- b. Transit trips and average vehicle occupancy must be maintained or increased.
- c. Total person trips and total vehicle trips both within and between counties.

These CMP planning horizon targets will be developed by SCAG cooperatively with the CMAs and other interested agencies and will incorporate other applicable State and federal requirements. If a discrepancy is identified between SCAG's forecast for the CMP planning horizon and the forecast provided by the CMA, SCAG's Regional Modeling Task Force and Regional Information Task Force will be consulted regarding the reason for the discrepancy. Task force recommendations will be integrated into the consistency evaluation provided to SCAG's policy committees and Executive Committee for approval.

1. "Implementing Agency", as applied in this context, refers to the agency identified in the Regional Mobility Plan or the appropriate AQMP as having a role in an action or measure contained in these plans, including planning, programming, administration, finance, construction, operation, maintenance, or monitoring.

The CMAs may rely on travel demand forecasts produced by SCAG to develop the CMP. The following criteria apply when a separate model run and/or database are used to develop the CMP and evaluate traffic impacts of land use decisions on the CMP highway system:

Database

The CMA must cooperatively develop the CMP planning horizon forecasts of population, housing and employment with local jurisdictions. These forecasts must be consistent with local General Plans. SCAG will evaluate the CMA forecast for consistency. Staff recommendations to align the forecasts will need the approval of SCAG's policy committees and ultimately the Executive Committee. If necessary, a process for reconciling the databases will be undertaken between SCAG staff and staff representatives of the CMA and will produce a forecast that will be the basis of planning applications for both SCAG and the CMA.

Modeling

The CMA must participate in an on-going regional model and database program through SCAG's Regional Information Task Force and SCAG's Regional Modeling Task Force. This program is designed to improve consistency between regional and county-level model development in the region. To support this cooperative process, the CMA must meet the following requirements:

- a. The CMP planning horizon must be consistent with that agreed upon within the region.
- b. CMP traffic analysis zones must be compatible with census tracts or SCAG's traffic analysis zones.
- c. The CMP model must produce, at a minimum, a vehicle trip production and attraction table by at least three trip types (home-based work, home-based nonwork, and nonhome-based).
- d. The CMP modeling network must contain, at a minimum, the SCAG's System of Regional Significance which is contained in the RMP.

Part 3: To ensure compatibility between the CMPs within the region in evaluating the impacts of land use decisions on the CMP highway system and for monitoring level of service, the CMP must meet the following requirements:

- a. The CMP transportation system must connect to the system designated in (the) adjacent counties(y).
- b. Traffic level of service must be assessed using either Circular 212, the 1985 Highway Capacity Manual or a method that SCAG has found consistent with the 1985 Highway Capacity Manual.

RMP AMENDMENTS

Because the CMP process is intended to provide greater detail in the short-range action element of the RMP, differences may arise. The RMP amendment process² provides some flexibility to the CMAs in addressing the CMP requirements. This process would be used to evaluate a project or a program to determine whether the project or program is a refinement, i.e. an addendum, to the RMP, or would be treated as an RMP amendment. Before an RMP amendment can be adopted by SCAG, the project or program must satisfy these requirements.

2. See Appendix A for a more detailed description of the RMP Amendment Process.

Letter 3. Response to Comments from Cindy S. Greenwald, Manager, Planning and Technology Advancement, SCAQMD, September 11, 1992.

36. Specific analytic comments are addressed in response to comments 37-45 below.

37. The environmental documentation for the CMP is directly related to prior environmental documentation prepared for the Regional Mobility Plan (RMP). The California Environmental Quality Act (CEQA) expressly encourages "tiering". In this case, the CMP EIR is a subsequent tier to the RMP EIR. As a result, mobile emissions quantified in the RMP are applicable to the CMP. Additional quantification of mobile emissions for subsequent years of the CMP will be possible after completion of the Countywide Transportation Model.

In addition, Mitigation Measure C.1 requires the following to address potential air quality impacts that could result from the construction and/or operation of specific CMP CIP projects:

I.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the air quality impacts of individual CMP CIP projects. As part of the review, the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:

- preparation in accordance with applicable guidelines (SCAQMD, CALTRANS, FHWA, EPA etc);
- both construction and operation phase emissions and criteria pollutant concentrations, and compare emissions and concentrations to established SCAQMD daily emission thresholds, as well as to California Ambient Air Quality Standards (CAAQS);
- consistency with the Air Quality Management Plan;
- demonstration that significant air quality impacts have been mitigated in a manner consistent with the provisions applicable State and Federal clean air legislation.

38. Please refer to Response to Comment 37.

39. Please refer to Response to Comment 37.
40. Maintaining highway LOS is one of the fundamental objectives of the CMP, upon which the entire program is structured. Therefore, this comment reflects the overall purpose of the program itself. In particular, as indicated in the CMP EIR (pages 4, 28 and 29), the CMP land use analysis program will require that local jurisdictions be responsible for analyzing the impact of development on the regional transportation system through project EIR's. Specific mitigation measures necessary to maintain the level of service (LOS) standard will be determined by local jurisdictions through a project's EIR analysis.

Please refer also to Response to Comment 3.

41. CMP statute does not require contingency measures to meet delays in local jurisdiction implementation of the Model TDM Ordinance. However, if local jurisdictions do not adopt and implement the Model TDM Ordinance, they risk losing gas tax funds. LACTC stands ready to work with local jurisdictions to ensure that CMP TDM responsibilities are met and to prevent the loss of gas funds. In addition, the Model TDM Ordinance is not performance based, therefore the concept of establishing contingency measures to remedy "shortfalls" in performance does not apply.

Local jurisdictions are responsible for adopting and implementing the Model TDM Ordinance by April 1, 1993.

42. Please refer also to Response to Comments 3, 33, 64, 92, 94, 120 and 127.
43. It is recognized that implementation of the CMP CIP element could result in traffic-related air quality "hot spots" at transit centers, park and ride lots, and similar facilities included in the CMP CIP element. Individual CIP projects will be subject to subsequent environmental review. It is infeasible to evaluate site-specific CO impacts in a program-level EIR. In addition, as called for in Mitigation Measure C.4 (Table S-1, page S-9 of the CMP EIR), to assist in addressing these issues LACTC is participating in the development of the Carbon Monoxide Protocol currently being coordinated by the Southern California Association of Governments (SCAG). The issue is also under review in SCAQMD's CEQA Handbook. It is anticipated that environmental evaluation of subsequent CMP CIP projects would utilize this protocol which will become part of the Air Quality Management Plan Conformity Procedures.

Please refer also to Response to Comment 3, 33, 64, 92, 94, 120, and 127.

44. Please refer to Response to Comment 37.

45. Please refer to Response to Comments 37-44.
46. Comment noted.



**South Coast
AIR QUALITY MANAGEMENT DISTRICT**

21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (714) 396-2000

September 11, 1992

L.A.C.T.C.
1992 SEP 21 PM 12:37

**Ms. Kendra Morries
County of Los Angeles
Transportation Commission
818 West 7th Street #1100
Los Angeles, CA 90017**

Dear: Ms. Morries:

**Subject: Draft EIR for the Los Angeles County Congestion Management Program
SCCAQMD #LAC920605-02**

The South Coast Air Quality Management (SCAQMD) is responsible for adopting, implementing, and enforcing air quality regulations in the South Coast Air Basin. The SCAQMD reviews and analyzes environmental documents for projects that may generate significant adverse air quality impacts, and thereon, advises the Lead Agency.

The SCAQMD has reviewed the Draft Environmental Impact Report (Draft EIR) for the Los Angeles County Congestion Management Program (CMP) and finds that the potential air quality benefits attributed to CMP implementation have not been fully addressed in the EIR. The CMP's beneficial air quality impacts should be documented and shown to produce reductions in criteria pollutant emissions.

The SCAQMD recommends that a detailed analysis of the following issues be included in the Final EIR:

- o The Draft EIR assumes the mitigation of significant adverse air quality impacts from the project to a level of insignificance. Emissions before and after mitigation should be identified and compared in the Final EIR.
- o The anticipated emission reductions under mode shift strategies, traffic flow improvements, highway capacity improvements, and the land use analysis program should be based on the estimates of total trips, the vehicle miles traveled (VMT), mobility levels (traffic speeds) along the CMP network, and vehicular emission factors.

36

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- o The impacts of transportation control measures and their emission reduction potential should be fully analyzed. Capacity inducing and demand reducing mitigations proposed in the Draft EIR should be analyzed to indicate the VMT reduction anticipated by the implementation of the CMP. 39
- o The Final EIR should analyze the potential degradation of LOS along the road segments in the 1,000 mile CMP network. Road segments currently operating at level of service (LOS) E or better should not be allowed to degrade below E. LOS F road segments should not be allowed to degrade further. The Final EIR should indicate when and by whom LOS impact assessment will be performed. Mitigation measures required to correct any degradation of LOS should be fully discussed. 40
- o Contingency measures to meet any delays and shortfalls in the adoption of trip reduction and transportation demand management ordinances by local jurisdictions should be analyzed. Responsibilities to adopt ordinances and contingency measures and dates for their adoption should be clearly indicated in the Final EIR. 41
- o The Draft EIR has not analyzed the impacts of CMP induced redistribution of land uses. The Draft EIR states that project redistribution may not result in adverse impacts. The Final EIR should fully analyze the potential land use redistribution. Adverse impacts due to the redistribution of land uses should be mitigated. 42
- o The anticipated intensification of certain land uses in the vicinity of transit nodes and the development of additional employment centers in the vicinity of housing opportunities should be analyzed in the Final EIR. A discussion of alterations in the location and distribution of population should be included in the Final EIR. The potential for carbon monoxide concentrations to exceed the national standards is high at "hot spots" where developmental densities may occur due to transportation corridors. The potential carbon monoxide (CO) exceedences along the CMP network should be addressed in the Final EIR. Methods to eliminate CO hot spots should be considered in the Final EIR. 43
- o The Draft EIR has analyzed five alternatives based on selected issues concludes that the CMP is the superior alternative. The Final EIR should provide an air quality analysis in greater detail for each of the alternatives. 44

Conclusion

The SCAQMD recognizes the inherent air quality benefits which may result from CMP implementation. The CMP's proposed link between air quality benefits and CMP implementation should be clearly established in the Final EIR. The issues discussed in this document and subsequent evaluations should be included in the Final EIR to help the decision makers clearly assess the air quality benefits of CMP implementation.

45

The SCAQMD appreciates the opportunity to comment on the proposed CMP, and looks forward to receiving a response to our comments prior to the adoption of the Final EIR. If you have any questions regarding these comments, please contact Connie Day, Program Supervisor, at (714) 396-3055.

46

Sincerely,



Cindy S. Greenwald
Manager, Planning and
Technology Advancement

CSG:CAD:PF
Attachments

Letter 4. Response to Comments from Elizabeth J. Harris, California Environmental Quality Officer, Los Angeles Unified School District, September 9, 1992.

47. The potential impacts on schools discussed in the public services section of the revised Initial Study are those associated with operations and enrollment changes. The original December 1991 Initial Study was based on a CMP program which included a mitigation fee component. Since it was felt that his component might have the potential to affect land use, the first Initial Study indicated that there was a potential for land use change related school impacts. The revised Initial Study in June 1992, assessed the potential for the revised CMP, which no longer included a mitigation fee component or deficiency planning, to affect land use and thus schools. The potential land use impacts of the revised CMP are limited, school impacts were not identified as potentially significant. The June 1992 revised Initial Study did indicate that the CMP had the potential to result in noise and air quality impacts on sensitive receptors, including schools. These impacts are analyzed in the CMP EIR.

48. Impacts on schools would be primarily those of localized CIP project specific noise and air quality impacts. These impacts are addressed in the noise and air quality portions of the CMP EIR, rather than in the public services section. Since the CMP EIR concludes that the CMP is unlikely to alter the nature of anticipated land use changes, as explained in Response to Comment 47, school impacts were not identified as potentially significant.

49. Mitigation measure I.1 on page 142 and S-24 of the CMP EIR is modified to read:

I.1 The LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigation in order to minimize the public service impacts of individual CMP CIP projects. As part of the review, the LACTC may comment on the adequacy of the analysis and mitigation to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:

- Prior to construction of individual CMP capital improvement projects, the lead agency consults with affected police and fire departments to ensure these agencies adequate access to the affected portions of the CMP network.

- An assessment of the potential impacts to parks and recreational facilities is included in the environmental assessment of any CMP capital improvement projects to be located in proximity to parks and recreational facilities which includes an assessment of traffic, noise and access impacts.
 - An assessment of the potential impacts to schools is included in the environmental assessment of any CMP capital improvement projects to be located in proximity to a school which includes an assessment of traffic, noise, and access impacts.
50. Please see Response to Comment 49 which modifies Mitigation Measure I.1 of the CMP EIR to ensure that school related impacts are not inadvertently overlooked in CMP CIP project level EIR's.
51. LOS captures the impact of all trips on the system, including home to school trips. It does not distinguish between trip types.
52. The land use analysis is based on the added congestion that additional trips will have at traffic count locations on the CMP highway system in proximity to new development. This analysis is not based on either VMT or jobs/housing, but on vehicle trips.
53. The impact of the adopted land use forecast on schools was addressed in the EIR's for the RMP and the GMP, and appropriate mitigation was identified in those documents. The CMP would not result in substantial alterations in this land use pattern and therefore, no additional mitigation is identified. As required by revised Mitigation Measure I.1 (See Response to Comment 49), the Lead Agency is responsible for addressing localized school impacts associated with individual CMP CIP projects as part of the environmental assessment of those projects.
54. It is not anticipated that the CMP TDM component will result in substantial increased densities in targeted centers. Mitigation Measure A.4 requires that Lead Agency address land use impacts associated with specific CMP CIP projects as part of the environmental assessment of those projects.

Please refer also to Response to Comments 3, 33, 64, 92, 94, 120 and 127.

55. Under the CMP, land use decisions remain under the control of local jurisdictions. Local jurisdictions will continue to be responsible for addressing the impacts of desired growth in their targeted centers.

Please refer also to Response to Comments 3, 33, 64, 92, 94, 120 and 127.

56. Mitigation Measure D.1. in the CMP EIR includes provisions for use of the Federal Highway Administration's FHMP 773. This guidance document specifies one hour noise levels. The levels specified in FHMP 773 for the peak hour period are the same as the LAUSD standards.
57. The environmental assessments of individual CMP CIP projects are subject to AQMD air quality analysis requirements, which include requirements regarding the analysis of a project's potential air quality impacts on sensitive receptors, such as schools (see Mitigation Measure C.1 in the CMP EIR, Table S-1, page S-7). The AQMD will continue to review EIR's to ensure that analytic requirements are met.
58. The CMP EIR is a program level EIR. The level of analysis required to determine if specific schools are affected must be conducted at a project-level. As required by Mitigation Measure C.1 the Lead Agency is responsible for addressing the effect of localized emissions on sensitive receptors such as schools as part of the environmental assessment of specific CMP CIP projects. Mitigation Measure C.1 also requires that the analysis be prepared based on applicable guidelines.
59. As indicated in Mitigation Measure C.1 in the CMP EIR the Lead Agency is responsible for addressing air quality impacts for CMP CIP projects on sensitive receptors based on criteria established by the SCAQMD.

In addition, as called for in Mitigation Measure C.4 (Table S-1, page S-9) in the CMP EIR, to assist in addressing "hot spot" issues LACTC is participating in the development of the Carbon Monoxide Protocol currently being coordinated by the Southern California Association of Governments (SCAG). The issue is also under review in SCAQMD's CEQA Handbook. It is anticipated that environmental evaluation of subsequent CMP CIP projects would utilize this protocol which will become part of the Air Quality Management Plan Conformity Procedures.

Los Angeles Unified School District

WILLIAM E. ANTON
Superintendent of Schools

Business Services Division

DAVID W. KOCH
Division Administrator, Business Services

ROBERT BOOKER
Chief Business & Financial Officer

C. DOUGLAS BROWN
Deputy Administrator, Business Services

**Environmental Review File
Congestion Management Program**

BOB NICCUM
Director of Facilities Planning & Real Estate

September 9, 1992

**Kendra Morris, Land Use Project Manager
Los Angeles County Transportation Commission
818 West Seventh Street (M/S 2200)
Los Angeles, CA 90017**

Dear Ms. Morris:

**Re: Congestion Management Program for
Los Angeles County**

Thank you for providing us the opportunity to comment on the draft environmental impact report (DEIR) for the above-referenced program.

It was disturbing to note that while the December 1991 Initial Study indicated that Schools might be impacted by the Congestion Management Program, the revised Initial Study changed the determination from "maybe" to "no" (see attachment). Please explain why this was done.

Please also explain why this determination of no impact was not corrected, in response to our comments on the June 1992 Notice of Preparation. Why were few of the concerns expressed in our letter of June 30, 1992, discussed in the DEIR?

Though our January 8, 1992 comments may have been partially heeded in that text was added about localized impacts of pollutant "hot spots", the removal of Schools from the Public Services category indicates an ignorance or disregard of other significant adverse impacts on schools, among them impacts on land use, noise, and other air quality impacts.

It seems both logical and appropriate that schools, as parks, should be among the public service categories which are acknowledged to be impacted. Please comment on whether the following mitigation measure, which is from page 143 of the DEIR and which is for parks and recreational facilities, would be also appropriate for schools:

An assessment of the potential impacts to parks and recreational facilities is included in the environmental assessment of any CMP transportation facilities to be located in proximity to parks and recreational facilities which includes an assessment of traffic, noise, and access impacts.

September 9, 1992

Please adapt this mitigation measure to include schools, and to include also an assessment of air quality impacts on schools, which are considered sensitive receptors.

If analysis of school impacts and mitigation are not provided, please explain why. Would the decision not to consider school impacts in this program level KIR imply that LACTC, in either its land use analysis, or during environmental review of the capital improvement program's (CIP) specific projects, need not consider impacts on schools?

LAND USE

The CMP's Land Use Analysis Program requirements may have impacts on schools which have not been considered. To what extent do LOS (Level of Service) indices reflect project-generated trips in home-to-school commuting? To what extent is the land use analysis based on vehicle miles travelled (VMT) formulas and jobs-housing formulas? These formulas are devised to improve traffic and air quality in several respects, but by ignoring the need to balance jobs and housing with educational infrastructure, fail to realistically analyze the traffic impacts of a land use decision. To the extent that jobs and housing are balanced, but schools are not, the savings in home to work commuting is partially if not entirely negated by the increase in home to school commuting, as students must travel long distances by car or bus to schools elsewhere in the District that have available classroom space. Thus, lack of adequate school infrastructure to serve a community leads to increased traffic and a deterioration of air quality. Please ensure that imbalances in jobs-housing with schools are reflected in the methodology of the Land Use Analysis Program.

The CMP will also have an indirect impact on schools if the TDM (Transportation Demand Management) component results in increased density in targeted centers areas which are near schools. It should be remembered that as growth is encouraged in "centers", this growth should be balanced or phased-in with growth of new school facilities. (For instance, the CMP may encourage residential growth in areas of planned metro-rail stations; this may be beneficial in terms of transit and air quality, but not in terms of schools, because these areas typically are serviced by schools which are already way above-capacity).

Additionally, growth in "centers" which are located adjacent to schools (which are sensitive receptors) should be held to a level where noise and air impacts are not significant. Alternatively, the localized impacts of air quality and noise on schools should be fully mitigated. To the extent that this is not accomplished, the indirect impacts of the CMP on schools may be significant.

NOISE

Attached are the District's noise standards. We ask that the LACTC take these standards into consideration in formulating the CIP, and in reviewing projects which have regional significance. It should be remembered that schools are sensitive receptors in relation to noise, and that many of the types of projects which are listed on pages 86 and 87 of the DEIR (e.g., construction of elevated HOV lanes, widening of facilities on the existing CMP highway network that bring travel lanes and mobile noise sources closer to sensitive adjacent land use receptors) interfere with the learning environment.

56

AIR QUALITY

Since children are especially sensitive to air pollution, we support efforts of the CMP to improve the regional air quality of the South Coast Air Basin. We are concerned, however, at the CMP's lack of measures to minimize localized air emission impacts which may occur at sensitive receptor schools. Aside from an entry in the Initial Study Checklist, indicating the CMP may lead to emissions of hazardous air pollutants within one-fourth of a mile of a school, little attention was given to this issue in the DEIR.

57

The District's response to the Notice of Preparation commented on studies which show that localized traffic emissions, reentrainment of dust (containing lead and other metals) near highways and other toxic emissions are especially damaging to students, who are more susceptible than adults to poor air quality. [See "Air Sickness: Evidence Mounts of Dramatic, Permanent Damage to Lungs of Children," Los Angeles Times, E, p. 1, April 3, 1990.] Aside from being at greater risk due to physiological factors, students may be among the few in the area who are not provided state-of-the-art air filtration/air conditioning systems. Compounding this, students exercise on the playground. Poor air quality may especially affect athletes, and compromise a full student athletic program.

58

Where localized air emissions are an acknowledged impact of the CMP, why were the above issues not addressed in the EIR? Where the CMP results in above-criteria air emissions at schools, mitigation should be provided.

Page S-9, Mitigation Measure C.4, states that the LACTC shall encourage and participate in the evaluation and reconciliation of localized adverse impacts with regional improvements. . . to broaden the understanding of "hot spots" of pollutant emissions, and the tradeoffs between hot spot creation and regional emission

59

Ms. Morries

- 4 -

September 9, 1992

Case
80

reductions. In light of the fact that schools are sensitive receptors to air emissions, it would be appropriate for the LACTC, as mitigation for a plan which will likely encourage localized emissions near schools, to conduct a study on air emission criteria for such "hot spots" when they are located close to sensitive receptors, and to identify feasible and effective mitigation measures. Please contact this office for additional information on such a study.

Thank you for your consideration of our concerns.

Very truly yours,

Elizabeth J. Harris

Elizabeth J. Harris
California Environmental Quality Act Officer
for the Los Angeles Unified School District

Attachments

c: Ms. Korenstein
Mr. Slavkin
Dr. Anton
Dr. Booker
Mr. Wohlers
Mr. Koch
Mr. Prescott
Mr. Brown
Mr. Niccum
Ms. Wong
Assemblyman Katz

Congestion Management Program
December 1991 Initial Study

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
14	<u>Public Services:</u> Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:			
a.	Fire protection?	—	<u>X</u>	—
b. (continued)	Police protection?	—	<u>X</u>	—
c.	Schools?	—	<u>X</u>	—
d.	Parks or other recreational facilities?	—	<u>X</u>	—
e.	Maintenance of public facilities, including roads?	<u>X</u>	—	—
f.	Other governmental services?	<u>X</u>	—	—

Congestion Management Program
Revised Initial Study, June 1992

		<u>YES</u>	<u>MAYBE</u>	<u>NO</u>
14	<u>Public Services:</u> Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:			
a.	Fire protection?	—	<u>X</u>	—
b.	Police protection?	—	<u>X</u>	—
c.	Schools?	—	—	<u>X</u>
d.	Parks or other recreational facilities?	—	<u>X</u>	—
e.	Maintenance of public facilities, including roads?	<u>X</u>	—	—
f.	Other governmental services?	<u>X</u>	—	—

NOISE STUDY GUIDELINES FOR ENVIRONMENTAL DOCUMENTS

Noise control is important in determining appropriate land use near educational facilities. These guidelines and standards were intended for use for proposed projects that may result in significant and measurable increases in ambient noise levels at Los Angeles Unified School District sites.

The attached is designed to assist those who prepare noise study reports by providing some consistency to the way noise information is presented in environmental documents.

RECOMMENDED COMPONENTS OF A NOISE STUDY

I. Project Description

Provide a brief description of the project in terms of its effect on the noise environment and a brief description of the existing noise environment and its impact on the District.

II. A Detailed Survey of Existing Noise Environment

- A. Provide a map showing existing setting in relation to the proposed project with adjacent land uses, receptors, identified noise sources, and proposed sample locations. Pertinent distances should be noted.
- B. Survey must encompass the proposed project area and include all noise sensitive receptors (i.e. schools). Survey should establish the existing ambient noise level which may be used to establish compliance with District Noise Standards (See attached). Noise survey sites should include school sites within a quarter mile radius of the proposed project. Rationale for sampling location on District sites should be included in report.
- C. Survey should cover the time period when the school may be affected by the proposed project. Identify dates, times and duration of sampling (a minimum of 1 hour recommended).
- D. Survey should encompass a representative number of days to determine the existing "typical" noise environment.
- E. For time periods measured, the noise data should include Leq , L_1 , L_{10} , L_{50} , L_{90} , and identification of typical noise levels emitted by existing sources. If day-night measurements are made, report L_{dn} or $CNEL$ also.
- F. Summarize the present environment by providing a noise contour map showing lines of equal noise level in 5dB increments.
- G. Follow the recommended sampling protocol
 1. Utilize the "A" weighted scale of the sound level meter and the "slow" meter response (use fast response for impulsive type sounds).
 2. The noise measurements should be taken at all impacted District sites, both interior and exterior noise levels. Impacted sites are those which may be affected by construction noise and/or post construction.
 3. Microphone should be located four to five feet above the ground; ten feet or more from the nearest reflective surface, where possible. However, in cases where another

elevation is deemed appropriate, that elevation should be utilized and the rationale for the change discussed.

4. Measurements should be made at a point at least four feet from walls, ceilings, or floors nearest the noise source, with windows in the normal seasonal configuration.
5. Exterior noise measurements should be taken at the school property line at the point nearest the source.
6. Calibration of noise measurement equipment should be performed immediately prior to recording any noise data.

III. Future Noise Environment

- A. Provide a brief description of predicted future noise environment, for both short term (i.e., during project construction) and long term (i.e., after project) impacts. The scope of analysis will vary depending upon the type of project, but at a minimum the following must be provided for short term and long term impacts.
 1. Discuss types of noise sources and their proximity to the potentially impacted school site(s).
 2. Description of Operations and Activities
 - a. Average daily level of activity (e.g., traffic, equipment operations in hours per day).
 - b. Distribution of activity over day and nighttime periods, days of week, etc.
 - c. Description of noise sources (i.e., percent truck; percent construction equipment; percent machinery).
 - d. Identify any unusual noise characteristics (impulsive, tone).
- B. Method Used to Predict Future Levels
 1. Identify computer model used
 2. State any modifications to standard model in detail and rationale for changes.
 3. Show noise levels at District sites in Leq L_1 , L_{10} , L_{50} , L_{90} .
 4. Give any other information/data yielded by model used.
- C. Provide contours of Predicted Future Levels

IV. Impacts

- A. Quantify anticipated changes in noise by comparing ambient noise levels to predicted or projected noise levels with project. Evaluate the impact on District sites.
- B. Discuss effects of increased noise on school environment (e.g., speech interference).

V. Mitigations

- A. Discuss how adverse noise impacts can be mitigated. List any alternative technologies for mitigation, their relative effectiveness and feasibility. If noise barriers are proposed for mitigation, specify attenuation.
- B. Outline responsibilities of the lead agency.
- C. Provide a discussion of noise impacts that cannot be mitigated.

DISTRICT NOISE STANDARDS

	L_{10}^*	L_{eq}^{**}
EXTERIOR NOISE LIMITS	70 dBA	67 dBA
INTERIOR NOISE LIMITS	55 dBA	52 L_{eq}

In those cases where the existing ambient noise levels exceeds the District Noise Standards, the maximum measured ambient noise level will be considered the standard.

* L_{10} : Sound level that is exceeded 10 percent of the time for the time period under consideration.

** L_{eq} : A measure of the exposure resulting from the accumulation of A-weighted sound levels over a particular period of interest.

Letter 5. Response to Comments from James E. Hartl, AICP, Director of Planning, Los Angeles County Department of Regional Planning, September 3, 1992.

60. Specific comments are addressed in Response to Comments 61-74 below.
61. The CMP EIR describes the alternatives at a program level of specificity. As noted in Chapter V of the CMP EIR, the alternatives are tiered from the alternatives contained in the RMP EIR. A summary of the quantitative analysis of the RMP alternatives is included in Table 26 of the CMP EIR (see pages 153-163). As did the RMP EIR, the CMP EIR includes a TDM Intensive Alternative and a Capital Intensive Alternative. These CMP alternatives fit within the general framework of the adopted RMP strategy. The more capital intensive and TDM alternatives of the RMP are used to provide a sense of how the CMP Capital Intensive and TDM Intensive alternatives compare to the more balanced strategy of the CMP, since like the CMP, the adopted RMP is the more balanced of the strategies analyzed in the RMP EIR.
62. A draft CMP was first released in August 1991. Over time, components to that August 1991 draft were modified, and resulted in a revised Notice of Preparation (NOP) issued on June 5, 1992. The revised NOP contained a new project description that outlined the modifications made to the CMP. The CMP EIR contained the same revised project description as contained in the June, 1992 NOP. Throughout the CMP EIR the program and specific changes made to it since release of the August 1991 Draft CMP are discussed. The project evaluated in the CMP EIR, i.e the CMP, has not changed significantly since release of the revised NOP or the CMP EIR. The Final Draft CMP released in September 1992 is also consistent with project descriptions and discussions contained in the June, 1992 NOP and the CMP EIR.
63. The RMP EIR contains an analysis of the cumulative and growth inducing impacts of the 1989 RMP, with which the first year CMP must be consistent as required by state law. The RMP is currently being updated, and subsequent CMP's will be consistent with the appropriate RMP update. Chapter IV of the CMP EIR contains an analysis of the first year CMP's cumulative and growth inducing impacts.

64. As discussed in the CMP EIR (page 15), the 1992 CMP includes all statutorily required CMP elements. Since state law requires the CMP to be updated biennially, LACTC will build on this core program as implementation experience is gained.

LACTC acknowledges that some mitigation strategies available to address deficiencies on the CMP network could have land use impacts, including efforts on concentration and deconcentration of land uses. However, the 1992 CMP does not include a deficiency plan element or guidelines for addressing deficiencies on the CMP network. Although it is anticipated that methods to address CMP network deficiencies will be included in future updates of the CMP, it is infeasible to address the environmental effects of any such strategies at this time. Identification of deficiencies cannot take place until first year congestion monitoring is complete. Further, a wide range of deficiency mitigation strategies, with varying effects on land use, are currently under analysis by LACTC's Countywide Congestion Study. Until this range of mitigation strategy alternatives has been fully developed and reviewed, environmental analysis is premature. As discussed in detail in the CMP EIR, the 1992 CMP is not expected to have significant effects on concentration or deconcentration of land uses.

Please refer also to Response to Comments 3, 26 and 33.

65. These projections are currently the adopted regional projections contained in the RMP, with which the CMP is required by law to be consistent. SCAG is currently updating these projections and the RMP, and subsequent CMP's will be consistent with the appropriate RMP update. SCAG's preliminary results, however, do anticipate an increase in forecasted population rather than a decrease.
66. The graphic used in the CMP EIR was excerpted from the Final EIR for the RMP. Based on the comments received, we have reviewed the seismic mapping available from the California Division of Mines and Geology as well as the Safety Element of the County of Los Angeles. Both documents are dated 1990 and no APSSZ is shown.

The following sentence is added at the beginning of the last paragraph on page 89:

The general description of the geology setting of Los Angeles County has been excerpted from the Los Angeles County Safety Element (December 6, 1990).

67. The following language is added to page 124 of the CMP EIR following the first paragraph:

In addition, a number of local jurisdictions have included a discussion of biological resource issues in their General Plans, or have adopted local ordinances for the preservation and protection of specific species or plant or animal communities. For example, the preservation of oak trees is a major issue in many communities.

The following sentence is added at the end of the first paragraph on page 125 of the CMP EIR:

In addition, individual CMP CIP projects may have the potential to impact biological resources identified as significant in local General Plans or protected by local ordinances.

The second bullet item under Mitigation measure G.1 on pages 125-126 and S-18-S-20 is modified to read:

Site-specific studies are required for each CMP capital improvement project located in the vicinity of an SEA, or in any area identified as potentially environmentally significant by the local jurisdiction, to determine whether significant plant or animal life or plant or animal life protected by local ordinance is present in a proposed alignment, and the level of impact on those resources. In consultation with the California Department of Fish and Game, the U.S. Fish and Wildlife Service and the local jurisdiction in which the project is located, detailed biological surveys are conducted prior to the adoption of roadway alignments which have the potential to adversely affect significant or protected biological resources.

68. The Final Draft CMP, released in September 1992, contains the minimum Land Use Analysis Program guidelines, including model Transportation Impact Analysis guidelines, that local jurisdictions must adopt as part of their local land use process. LACTC staff will be working directly with local jurisdictions to assist in implementation issues. Local jurisdictions will be able to determine how best to implement the program within their own particular processes.
69. On page 93 of the CMP EIR, the fourth line, the word rapture is changed to:
rupture

70. The following paragraph is added following the first paragraph on page 131 of the CMP EIR:

Other Local Jurisdictions - In addition to the City of Los Angeles, a number of other local jurisdictions have designations for historic districts, structures and places of importance. The list of designated structures for several local jurisdictions is contained in Appendix E of this document.

The list of Culver City historic structures contained in Comment Letter 9 and City of Glendale historic structures contained in Comment letter 10 are added to Appendix E.

The fifth bullet item of Mitigation H.1 on page 136 and S-21-22 of the CMP EIR is amended to read:

The environmental assessment adequately evaluates the potential for significant impacts to nearby historic resources, including locally designated resources, and includes appropriate mitigation.

Reference to Appendix D in the last line of the first paragraph on page 131 of the CMP EIR is changed to:

...Appendix E...

71. The last sentence of the first paragraph under Fire Services on page 138 is modified to read:

The U.S. Forest Service provides fire protection for all national forest lands within the County and the County Fire Department serves the northeastern area of the County.

72. A larger scale version of this map is available for inspection at the CMP staff offices of the LACTC located at 818 West Seventh Street, Los Angeles, CA 90017.

73. The model TDM Ordinance was analyzed in the CMP EIR. Local jurisdictions adopting the model ordinance will be able to reference the CMP EIR during their local environmental review process.

74. Comment noted. See Response to Comments 84 and 89.



PD 513

Letter 5

Los Angeles County
Department of Regional Planning
Director of Planning, James E. Hartl, AICP



226244 SEP 10 1992

September 3, 1992

Kendra Morries
Los Angeles County Transportation Commission
818 West Seventh Street (M/S 2200)
Los Angeles, CA 90017

Dear Ms. Morries:

In response to your July 27, 1992, "Notice of Availability of Draft Environmental Impact Report and Public Workshops", I am submitting for your consideration the attached comments on the DEIR for the Congestion Management Program.

If you have questions, please call Jene McKnight at (213) 974-6464, Monday through Thursday.

Very truly yours,

DEPARTMENT OF REGIONAL PLANNING


James E. Hartl, AICP
Director of Planning

JEH:JSM:lh

Attachment

c: Richard Dixon
DeWitt W. Clinton
Thomas A. Tidemanson

60

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES COUNTY CONGESTION MANAGEMENT PROGRAM

The staff of the Department of Regional Planning, Los Angeles County, has reviewed the Draft Environmental Impact Report (DEIR) for the Los Angeles County Congestion Management Program (CMP) and submits the following comments.

- The discussion of alternatives, beginning on page 152, should relate the proposed Congestion Management Plan or Program to the alternatives and indicate how the proposed CMP was selected or formulated from the alternatives considered. 61
- The DEIR was published while the content of the CMP is still evolving and thus cannot fully document the impacts of the program. 62
- The DEIR defers much impact analysis to future individual project EIRs. However, project EIRs are inadequate instruments for identifying the overall regional and cumulative impacts of the CMP. Because the Regional Mobility Plan (RMP) predates the CMP, we do not believe the RMP EIR adequately documents cumulative CMP impacts. It is thus necessary for the DEIR to adequately document the major regional, cumulative and growth inducing impacts of the CMP. 63

Accordingly, we disagree with the conclusion at the top of page 146 that because the CMP is consistent with regional growth projections it is not expected to have a significant impact on decentralization or deconcentration. Repeatedly, during the course of the CMP project, LACTC staff and/or consultants have presented information showing the CMP highway network as very congested in older or highly developed areas of Los Angeles County and less congested in suburban and rural areas. This means that projects in congested areas will have higher mitigation costs (or may be abandoned or disapproved) while projects in less congested suburban and rural area may proceed with lower (or possibly no) mitigation costs. This will result in differential mitigation costs that will penalize inner metropolitan area growth and induce suburban and rural growth. 64

The CMP will make conventional central city projects more expensive due to mitigation costs. At the same time there is no effective mechanism for applying CMP mitigation to the inner metropolitan area "unconventional economy" which contributes importantly to congestion. For example, the Central Core (Central and East Central Areas) of Los Angeles County had a net population increase of about 421,000 people

between 1980 and 1990, while housing stock grew by only about 36,000 units during the same period. If housing stock in the core area had grown at the countywide rate, over 90,000 units might have been added. This suggests that 50,000 to 60,000 households were added in the core by the "unconventional economy" by such practices as doubling up or "bootleg" housing conversions. The household sector of the "unconventional economy" alone may have added approximately 500,000 trips, many of which were auto trips, to the core area streets in the 1980's. The CMP will tend to penalize conventional projects for traffic generated by the "unconventional economy", which again will make decentralized development relatively more attractive to developers.

- The CMP DEIR is based on projections which may be over optimistic in view of the prolonged recession, California's long term drought, recent earthquakes and the possible negative image created by the April civil disturbances. 64
- The geologic hazards map on page 95 does not show a segment of the San Gabriel Fault zone which has been designated as an Alquist-Priolo Seismic Study Zone (APSSZ). We believe that a portion of the Whittier Fault Zone may also have been designated as an APSSZ. Incidentally, the discussion of geologic setting (pages 89-93) appears to quote directly, in several cases from the Technical Appendix of the Safety Element of the Los Angeles County General Plan without acknowledgement. 65
- The discussion of biological resources (pages 119 - 127) focuses almost exclusively on significant ecological areas (SEAs) from the County General Plan. All important ecological assets are not within SEAs. For example, many valuable trees such as riparian woodlands and oak trees also exist outside SEAs. Preservation of oak trees is a major issue in many communities. The DEIR should address protection of environmental assets outside SEAs. 66
- Paragraph 2, page 29, indicates that local jurisdictions must adopt a land use program within 120 days of CMP adoption by LACTC (scheduled to occur by December 1, 1992). We observe that LACTC has not taken any visible steps to provide a model land use program and guidelines to aid the 89 local jurisdictions who must adopt a land use program by April, 1993. 67
- On page 93 (4th line) change - rapture to rupture. 68

- The discussion of historic resources on page 128 appears to overlook landmarks in many local jurisdictions such as the historic districts in South Pasadena. 70
- The reference to the Los Angeles County Department of Forestry is in error. There is no Los Angeles County Department of Forestry. This should be changed to the County Fire Department. 71
- The map on page 19 is difficult to interpret and should be clarified by use of higher contrast symbols. 72
- Please indicate what level of environmental documentation is advisable for local government Phase I and II TDM ordinances. 73
- We feel that the DEIR or a supplementary report should deal with the socioeconomic impacts of the CMP. Although not required by CEQA, we feel this will be a major issue due to depth of the current recession in Southern California. 74

JSM:lh
September 3, 1992

Letter 6. **Response to Comments from Tom Bradley, Mayor and John Ferraro, President, City Council, City of Los Angeles, September 8, 1992.**

75. Individual comments are addressed in Response to Comments 76-106 below.

76. Please refer to Response to Comment 3.

77. The Capital Improvement Program projects identified in the CMP CIP are those new State funded projects that have been approved by the California Transportation Commission in the 1992 State Transportation Improvement Program and were included in the RMP EIR.

 Please refer also to Response to Comments 3, 33, 63 and 64.

78. The LOS standards established by the CMP are intended to be applied consistently throughout the County.

 The underlying purpose of the CMP is to maintain regional mobility, which, in turn, will help to maintain the economic health of both the City and the region.

79. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires. Under the CMP, local jurisdictions retain discretion for selecting appropriate mitigation strategies (see Final Draft CMP, September 1992).

 Projects that are competing for State funding through the local Transportation Improvement Program process must demonstrate that they benefit the CMP highway system. However, such improvements are not required to be on the CMP system itself, and local improvements that provide a significant benefit to the CMP system are also eligible for State funding.

80. Where future expansion of regional facilities is planned, the CMP Land Use Analysis Program provides a means through which regional access to these facilities can be assured. The impact of trips attached to these future facilities from outside of Los Angeles County are accounted for in the Transportation Impact Analysis guidelines contained in the CMP (See Appendix D in the Final Draft CMP, September 1992).

Regarding the effect of the CMP on the regional economy, it should be recognized that the underlying purpose of the CMP is to maintain regional mobility which, in turn, will help to maintain the economic health of the region, including commerce and tourism.

81. The CMP is supportive of the development of the "centers" concept utilized by the City of Los Angeles as evidenced by the following statutory exemptions from CMP requirements:

- ▶ Traffic generated by low and very low income housing. Definitions of low and very low income housing are provided by the California Department of Housing and Community Development as follows:

Low-Income: equal to or less than 80% of the median income, with adjustments for family size.

Very Low-Income: equal to or less than 50% of the median income, with adjustments for family size.

- ▶ High density residential development located within 1/4 mile of a fixed rail passenger station and which is equal to or greater than 120 percent of the maximum residential density allowed under the local general plan and zoning ordinance.
- ▶ Mixed use development located within 1/4 mile of a fixed rail passenger station, if more than half of the land area, or floor area, of the mixed use development is used for high density residential housing, as determined by the agency. Mixed use development is defined by statute as development which integrates compatible commercial or retail uses, or both, with residential uses, and which, due to the proximity of job locations, shopping opportunities, and residences, will minimize new trip generation.
- ▶ Until June 1, 1995, buildings and structures damaged or destroyed in Los Angeles County as a result of civil unrest during the state of emergency declared by the Governor on April 29, 1992.

Further support is evidenced by the Countywide Congestion Study currently underway, which will investigate a method for crediting public or private improvements to the CMP system. The Study will also examine land use scenarios that maximize trip generation and will evaluate a program to create and encourage incentives for local land use decisions that reduce trips and that are supportive of development in proximity to transit centers and along major transit corridors.

Finally, the City of Los Angeles, LACTC and other interested agencies/parties are currently preparing a Joint Land Use Transportation Policy draft for consideration and implementation by the City of Los Angeles and LACTC.

82. Please refer also to Response to Comments 3, 26, 33 and 64.
83. Please refer to Response to Comment 82.
84. The RMP EIR contains an analysis of the cumulative and growth inducing impacts, and socio-economic impacts, of the 1989 RMP, with which the first year CMP must be consistent as required by state law. The RMP is currently being updated, and subsequent CMP's will be consistent with the appropriate RMP update. Chapter IV of the CMP EIR contains an analysis of the first year CMP's cumulative and growth inducing impacts.
85. LACTC is supportive of efforts to rebuild Los Angeles and revitalize the Los Angeles economy, and agrees that the CMP must be implemented with these considerations in mind. In response to this concern, the following policy statements are included in the September 1992 Final Draft CMP:
 - ▶ The CMP is being developed to be sensitive to the general economy of Los Angeles County. While increased mobility and reduced congestion serve attainment of this goal, CMP policies and procedures are being developed to minimize cost and provide certainty and predictability to the public and private sector alike.
 - ▶ Equity with respect to cost of service, quality of service, and access to service will be considered in programming decisions made by LACTC in the implementation of the CMP. In addition, equity considerations will be incorporated in on-going area-specific needs assessment and service distribution studies.

- ▶ Economic development opportunities will be aggressively pursued in high-volume transit corridors. MTA/LACTC will also develop programs for other areas to facilitate economic development in conjunction with transit improvements with the objective of maximizing the overall benefit of the community.

Finally, state statute exempts from the CMP, until June 1, 1995, buildings or structures damaged or destroyed in Los Angeles County as a result of civil unrest during the state of emergency declared by the Governor on April 29, 1992.

86. We appreciate the concern of the City of Los Angeles regarding credits for regional improvements. The issue of developing credits goes hand-in-hand with the development of deficiency plan strategies, and the development of credits is an important part of the Countywide Congestion Study. We welcome the continued involvement of the City of Los Angeles over the next six months in developing a countywide deficiency plan process and related credits. The CMP Policy Advisory Committee will continue to be an important forum for addressing deficiency plan/credit issues. This Committee includes representatives of the Los Angeles City Council and Department of Transportation and plays an instrumental role in CMP development.

Please refer also to Response to Comments 3 and 86.

87. In the August 1991 draft CMP, a countywide mitigation fee was discussed as a mechanism to meet the land use analysis requirement and address the deficiency plan process. LACTC took action in early 1992 not to further pursue a countywide mitigation fee approach, but to instead conduct a Countywide Congestion Study to develop an alternative approach for deficiency plan requirements. Pursuant to Commission direction a mitigation fee approach will not be considered.

The mitigation fee represented one alternative approach to meeting CMP deficiency plan requirements. Study of that alternative showed the complex issues which must be considered in development of deficiency plans, and the time which must be spent on both technical evaluation as well as building consensus toward workable solutions. This experience has been echoed throughout the state, as nearly all other counties are still in the process of developing deficiency plan guidelines.

It should also be reiterated that the deficiency plan is not an element that is required to be included in the CMP. "Deficiencies," by definition, do not occur and need not be addressed until portions of the system are shown to degrade below the level of service standard. Since the CMP is currently documenting levels of service for the first time, degradation of the system has not been shown. Local jurisdictions will not be responsible for implementing deficiency plans until the Countywide Study has been completed and LACTC adopts countywide deficiency plan guidelines.

The Countywide Congestion Study currently underway will evaluate congestion levels anticipated for the year 2010, and define countywide strategies for addressing the deficiencies caused. The congestion levels studied will be based on regional growth projections and will encompass the cumulative effects of all development on the regional system, not just those caused by significant projects. The Study will investigate a method for crediting public or private improvements to the CMP system. The Study will also examine land use scenarios that maximize trip generation and will evaluate a program to create and encourage incentives for local land use decisions that reduce trips and that are supportive of development in proximity to transit centers and along major transit corridors. The results of the Countywide Congestion Study will be presented to the Commission for adoption in the 1993 CMP, which will be subject to further environmental analysis.

88. The RMP EIR contains an analysis of the cumulative and growth inducing impacts, and socio-economic impacts, of the 1989 RMP, with which the first year CMP must be consistent as required by state law. The RMP is currently being updated, and subsequent CMP's will be consistent with the appropriate RMP update. Chapter IV of the CMP EIR contains an analysis of the first year CMP's cumulative and growth inducing impacts.

As noted in the CMP EIR, the potential for the 1992 CMP to create land use changes is minimal at a program level. The potential for the CMP to create community disruption and displacement; changes in community character; community revitalization effects; personal mobility and accessibility effects; and transportation opportunities for special groups such groups as the elderly, the handicapped and low-income households is discussed on pages 45-47 of the CMP EIR. The potential impacts on local government provision of services, to the degree that they can be assessed at this stage of the CMP Program, and to the degree that they may exist for the 1992 CMP, are discussed on pages 137-143 of the CMP EIR.

89. The CMP is a countywide program which is intended to improve mobility on the countywide system. The 1992 CMP establishes the overall process for implementation and identifies policy statements related to economic development and mobility opportunities. While not an EIR analysis issue, these CMP policy statements will guide the implementation of CMP program requirements, including future programming recommendations. These policies include the following:
- ▶ The CMP is being developed to be sensitive to the general economy of Los Angeles County. While increased mobility and reduced congestion serve attainment of this goal, CMP policies and procedures are being developed to minimize cost and provide certainty and predictability to the public and private sector alike.
 - ▶ Equity with respect to cost of service, quality of service, and access to service will be considered in programming decisions made by LACTC in the implementation of the CMP. In addition, equity considerations will be incorporated in on-going area-specific needs assessment and service distribution studies.
 - ▶ Economic development opportunities will be aggressively pursued in high-volume transit corridors. MTA/LACTC will also develop programs for other areas to facilitate economic development in conjunction with transit improvements with the objective of maximizing the overall benefit of the community.
90. LACTC agrees with the noted importance of developing centers around transit centers and along transit corridors, and that the CMP provide incentives for such development. The LACTC Commission has directed staff to examine the opportunity to provide incentives through the CMP process to encourage land use scenarios that minimize vehicle trips. Such strategies will be explored through the Countywide Congestion Study.

Please see also Response to Comment 81.

91. LACTC strongly concurs with this recommendation, as noted in Response to Comment 85.

92. The discussion of CMP land use impacts is identified at a program level in Chapter IV of the CMP EIR. The impacts of relocation are most properly addressed at the specific project level EIR stage. Land use impacts resulting from CMP transportation impact analysis are dependent on the mitigation strategies that are enacted at the local level and are unknown until such decisions occur. No quantification procedures currently exist that can determine program level trends more accurately than already described in the RMP EIR. As the CMP is tiered from and is within the parameters of the analysis conducted through the RMP EIR, the CMP EIR incorporated by reference these discussions from the RMP.

Please refer also to Response to Comments 26, 33, 64, 84, and 94.

93. See Comment 92.

94. Potential land use impacts discussed in the CMP EIR occur as a result of local mitigation actions or Capital Improvement Programs. Such impacts are most appropriately addressed at the project level rather than at the program level. The CMP EIR includes mitigation measures to ensure that such project specific EIR's for CMP CIP projects address these issues.

Please refer also to Response to Comments 26, 33, 64 and 84.

95. See Table S-1 in the CMP EIR for related mitigation measures recommended for CMP CIP projects.
96. Level of service standards are prescribed in statute as the measure of congestion and deficiencies on the CMP system. However, Assembly Bill 3093 authorizes LACTC to facilitate a statewide CMP Steering Committee to examine unresolved issues and modifications related to CMP statute. The Committee will be comprised of representatives from state, regional and local agencies, as well as members of the private sector and environmental interests. Statute requires discussion of various topics including: improving coordination of the CMP with state and federal clean air acts, examining mobility measures for air quality conformance purposes and other issues which are raised by Congestion Management Agencies statewide.

Because of statewide interest to examine alternative mobility measures to current level of service standards, we will include your recommendation in developing this study.

97. Traffic generated by the following types of housing projects are exempt from CMP requirements:

- ▶ Traffic generated by low and very low income housing. Definitions of low and very low income housing are provided by the California Department of Housing and Community Development as follows:

Low-Income: equal to or less than 80% of the median income, with adjustments for family size.

Very Low-Income: equal to or less than 50% of the median income, with adjustments for family size.

- ▶ High density residential development located within 1/4 mile of a fixed rail passenger station and which is equal to or greater than 120 percent of the maximum residential density allowed under the local general plan and zoning ordinance.
- ▶ Mixed use development located within 1/4 mile of a fixed rail passenger station, if more than half of the land area, or floor area, of the mixed use development is used for high density residential housing, as determined by the agency. Mixed use development is defined by statute as development which integrates compatible commercial or retail uses, or both, with residential uses, and which, due to the proximity of job locations, shopping opportunities, and residences, will minimize new trip generation.

98. The CMP highway system for the 1992 CMP was finalized by LACTC in December 1991 after extensive public input, in order to provide local agencies with needed certainty regarding monitoring requirements and associated costs.

The selected CMP highway system included routes that met the following criteria:

- ▶ All existing state highways (both freeways and arterials).
- ▶ Principal arterials defined as:
 - routes that complete gaps in the state highway system;
 - routes providing connectivity with the CMP system in adjacent counties: or

- routes along major inter-jurisdictional travel corridors, providing primary, high volume or multi-modal transportation.

The highway system will be reexamined with each CMP update, beginning in 1993, and routes can be added at that time.

Note that the CMP highway system is a monitoring not funding network, and therefore does not concentrate funding on this system to the detriment of any other streets.

Please refer also to Response to Comment 79.

99. Please refer to response to Comment 80.
100. Please refer to Response to Comment 86.
101. Please refer to Response to Comment 33 and 63.
102. While the RMP EIR was not developed with the CMP in mind, CMP statute requires the development of the CMP consistent with the RMP. The requirements of the CMP work toward the implementation of the RMP. Therefore, the impacts identified for the CMP are within the parameter of impacts identified in the RMP EIR. LACTC is actively participating with SCAG in the development of the RMP, and as the RMP is updated, the CMP will also be examined to reflect regional changes.
103. Comment noted.
104. As the commentor notes, CMP statute exempts from CMP transportation impact analysis requirements the following types of projects:
 - ▶ Traffic generated by low and very low income housing. Definitions of low and very low income housing are provided by the California Department of Housing and Community Development as follows:

Low-Income: equal to or less than 80% of the median income, with adjustments for family size.

Very Low-Income: equal to or less than 50% of the median income, with adjustments for family size.

- ▶ **High density residential development located within 1/4 mile of a fixed rail passenger station. High density development is defined by statute as a residential density which is equal to or greater than 120 percent of the maximum residential density allowed under the local general plan and zoning ordinance.**

- ▶ **Mixed use development located within 1/4 mile of a fixed rail passenger station, if more than half of the land area, or floor area, of the mixed use development is used for high density residential housing, as determined by the agency. Mixed use development is defined by statute a development which integrates compatible commercial or retail uses, or both, with residential uses, and which, due to the proximity of job locations, shopping opportunities, and residences, will discourage new trip generation.**

The Integrated Land Use/Transportation Policy document is currently being jointly discussed and drafted by the City of Los Angeles, LACTC, and other interested parties/individuals. The document will identify a long-term strategy for integrating and coordinating land use, urban form, housing and transportation associated with the development of transit infrastructure in the City of Los Angeles. The document discusses a 1/4 mile "primary influence area" that would contain minimum densities of residential and mixed-use development, and a 1/2 mile "secondary influence area" that would contain less intense development than the primary influence area and serve as a transition between denser transit-oriented development and adjacent established neighborhoods.

Since CMP statute identifies an exemption for certain types of development within 1/4 mile of a fixed rail station, it would require statutory change to extend the exemption to 1/2 mile, as proposed. LACTC will, however, use the results of the Integrated Land Use/Transportation Policy document in developing land use incentives through the Countywide Congestion Study.

105. The Model TDM ordinance identifies "TDM-friendly" facility standards for new non-residential development as a minimum standard for local compliance with CMP requirements. As facility standards are proposed as TDM measures in both the RMP and AQMP, this ordinance will work toward the attainment of regional mobility and air quality goals. As little documentation is available on the quantification of TDM measures (see Response to Comment 28), the ordinance was not developed to attain a specific goal, but rather to work toward RMP attainment and complement other strategies such as the employer related strategies of Regulation XV. LACTC has sought to assist local jurisdictions to meet the April 1993 compliance deadline by developing a model ordinance and releasing this ordinance in advance of final CMP adoption. We encourage local jurisdictions to initiate the adoption of the Model TDM Ordinance as soon as possible so that the ordinance is implemented on time.
106. LACTC has taken action not to require the installation of showers as a minimum TDM requirement in the model TDM Ordinance.



CITY HALL
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OFFICE OF THE MAYOR

TOM BRADLEY
MAYOR

September 8, 1992

Mr. Neil Peterson
Executive Director
Los Angeles County Transportation
Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Re: Congestion Management Plan/Draft EIR

Dear Neil:

We are in receipt of the Draft Environmental Impact Report (DEIR) for the Congestion Management Program (CMP). A detailed statement on the DEIR prepared by the directors of the departments of Transportation, Environmental Affairs, Housing Production and Preservation, Planning, and Airports is attached for your careful consideration.

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This letter highlights the primary issues and concerns of the City of Los Angeles.

It is our understanding that the final draft of the CMP will be released by the LACTC later this month but will not contain deficiency plan guidelines or requirements. The CMP legislation requires local jurisdictions to adopt deficiency plans to address any segment of the CMP network falling below established Level of Service (LOS) standards. The LACTC must adopt a County-wide deficiency plan that will provide guidance to local jurisdictions. Without this element, the DEIR is based on a plan that is missing one of its most significant components.

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The DEIR fails to adequately address the potential cumulative impacts of the CMP. It does not evaluate the environmental impacts that would result from the total build-out of all Capital Improvement Projects (CIP) or from structures that might be required to be built by deficiency plans. Consideration of the project's long-term cumulative impacts, that might otherwise be slighted in a case-by-case analysis, is one of the primary purposes for preparing a Program EIR.

The DEIR does not address the issue that regional network intersections in the City of Los Angeles are particularly and uniquely congested because the city is the principal economic center serving a five-county region.

The EIR should address the impact on the City's ability to improve critically important non-regional network arterials under the assumption that the CMP will direct funds exclusively--or primarily--to regional network arterials.

The EIR must address the issue of trips generated by regional public facilities such as LAX and the Harbor and the effect the CMP will have on commerce and tourism. Such facilities, located within the City, are designed to serve the residents and businesses of a five-county area. An impact analysis must be included for these public facilities that includes the impact of trips generated outside the County of Los Angeles, how the program requirements affect what can and cannot be built at these facilities and how this will affect the regional economy.

Land use planning in the City of Los Angeles is based upon a "centers" concept, a principle adopted by the Mayor and Council and pursued during the past 25 years. A consensus has been reached that the City should be developed as a multi-centered city, made up of a limited number of high density, multi-purpose centers dispersed throughout the City and connected by multi-modal transit corridors. When fully developed, such centers, by supporting a diverse mix of uses, will significantly reduce both work and non-work automobile trips.

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The DEIR concludes that the likelihood of significant decentralization of development which results from the implementation of the CMP will be "negligible". However, if the CMP imposes extensive requirements on Level E and F intersections, which represent all major intersections in urban areas, the likely result will be significant incentives to increase development in undeveloped portions of the County where LOS standards are much lower.

Such deconcentration will increase Vehicle Miles Traveled (VMT), add to the deterioration of air quality and create development pressure on open space and sensitive ecological areas. The EIR must address these issues in detail.


All socio-economic impacts of a project(s) must be addressed as mandated by the California Environmental Quality Act (CEQA). As stated in the City of Los Angeles' comments on the Notice of Preparation, the final EIR must include a discussion of the socio-economic impacts and provide mitigation for all cumulative impacts.

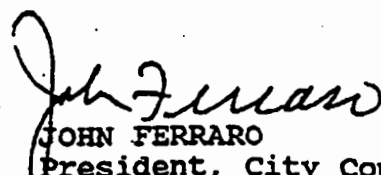
We understand that recent amendments to the CMP legislation include provisions such that buildings and structures damaged or destroyed in last April's civil unrest are not subject to the requirements of the CMP. In addition, the CMP must not penalize efforts to revitalize economically depressed areas of the City while Rebuild LA and other agencies are galvanizing efforts to revitalize and encourage investment in these areas. The above outlines the City's primary issues and concerns on the DEIR. More detailed comments are provided in the attached statement.

For the past two years, the City has communicated its concerns about the draft Congestion Management Program. To date, some of these issues remain unresolved, such as credits for transit investment such as Light Rail, Metro Rail and Metro Link and the CMP's designated regional network arterials. We are hopeful that we can reach agreement on these issues in the next few weeks so that the CMP and the EIR can be adopted by December, as required by law.

We look forward to continuing discussions in our cooperative and collective efforts.

Sincerely,


TOM BRADLEY
Mayor
City of Los Angeles


JOHN FERRARO
President, City Council
City of Los Angeles

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**Comments on Draft Environmental Impact Report
Congestion Management Program**

I. DEFICIENCY PLAN GUIDELINES/REQUIREMENTS - The guidelines or requirements for the preparation of a countywide CMP deficiency plan (that the LACTC is currently studying for inclusion as part of the CMP) will be a significant element, yet it is not presently fully studied or defined. Without this element, the CMP may be incomplete and the EIR is based on a plan that has not yet been fully defined. LACTC should address, in as great a detail as possible, how the countywide deficiency plan will function as an integral part of the CMP. 87

II. SOCIO-ECONOMIC IMPACTS - Under CEQA (California Environmental Quality Act), the economic and social impacts of a project, as they relate to physical changes in the environment, must be addressed. The CMP, particularly the projects of the Capital Improvement Program (CIP), will result in a large number of physical changes, yet no socio-economic analysis is presented. The City of Los Angeles' comments regarding the Notice of Preparation (NOP) requested (and we still recommend) that the final EIR include a discussion of, and provide mitigation for, these cumulative impacts. In particular, attention should be paid to the CMP's potential to affect the supply of housing; its potential to disrupt the structure of communities; its impact on local governments' provision of public services; its possible effects on population, household income, and employment opportunities; and its potential economic impacts on the business and development community. 88

The DEIR should evaluate how the CMP will benefit the mobility of all economic groups. Data should be included which will illustrate how the trip needs of commuters from low income inner city communities will be accommodated as effectively as suburban commuters. 89

III. DECONCENTRATION/LAND USE - Consistent with the City's Centers Concept, a central goal for citywide congestion reduction is to link new development with transportation systems. This is also the objective governing the LACTC in its development of the Joint Land-Use Transportation Policy being developed in conjunction with the City. If the CMP results in urban deconcentration, it would be in direct conflict with our objectives of jobs/housing balance and densification at transit stations. Such deconcentration will reduce housing opportunities for city workers, increase commuting distances, increase Vehicle Miles of Travel (VMT), add to the deterioration of air quality, and create development pressure on open space and sensitive ecological areas. The EIR needs to better address the above issues, including the Centers Concept. 90

In the spirit of Rebuild Los Angeles (RLA), the CMP should be careful to not penalize businesses that will locate in economically depressed areas of Los Angeles. 91

The DEIR did not contain any discussion of the CMP's effect on the relocation, 92

distribution, density or growth rate of population. It is not sufficient for the DEIR to simply assert that the CMP does not include any components which would significantly alter the land use in the region; this assertion needs more verification. In addition, research on this subject should be undertaken without a presupposition of the outcome.

The DEIR concludes that the CMP impacts on deconcentration are negligible, but fails to provide an adequate analysis to prove this point; the final EIR must fully analyze and address the CMP impact, particularly the relationship to land use. Moreover, the EIR should discuss the CMP's effect on the RMP's (Regional Mobility Plan) and GMP's (General Mobility Plan) long-term goals of improving the region's jobs/housing balance and reducing VMT.

The DEIR also states that land use impacts associated with the CMP would include potential community disruption and displacements, changes in community character, and community revitalization effects (page 45, DEIR). It is further reported that various classes of CMP CIP projects could lead to the localized displacement of adjacent business and residences. These issues warrant a study of the effects on population, employment, and housing.

- IV. **CONSTRUCTION IMPACTS** - The DEIR also indicates that the RMP EIR requires the use of construction techniques that minimize disruption effects (on the surrounding community) as a mitigation measure; these construction techniques should be clearly stated.
- V. **VEHICLE MILES TRAVELED** - The CMP's use of Level of Service (LOS) standards as the principal measurement of congestion does not account for density shifts and the location of development, including residential construction near job centers, transit stations, and urban centers. While concentrating development around centers and transit stations may increase specific area congestion as measured by LOS, it will reduce VMT citywide. Accordingly, the City of Los Angeles recommends the consideration of VMT as an additional measure of countywide congestion. An analysis of vehicle miles reduced from these policies should also be included.
- VI. **HOUSING PRODUCTION THRESHOLDS** - To be consistent with AQMP (Air Quality Management Plan) requirements to reduce VMT, and the City's and LACTC's desire to link jobs, housing, and transit, the CMP should focus on creating housing opportunities in job-rich areas by providing an exemption threshold for housing development, particularly affordable housing, in job-rich areas and/or areas near transit systems, within the exemption thresholds allowed under CEQA.
- VII. **CMP IMPACT BEYOND CMP NETWORK** - Attention must be given to the fact that major arterials in the city are important regional traffic facilities, but they are not currently on the CMP network. The EIR lacks analysis of traffic conditions in the inner Los Angeles area (e.g., Slauson Ave., La Cienega Blvd., Crenshaw Blvd., and La Brea

Avc.) These important regional arterials should be added to the CMP network.

This is even more critical in that concentrating funding toward improving the CMP regional system might mean the deterioration of streets and highways in localized areas that are not on the CMP network.

VIII. REGIONALLY SIGNIFICANT PUBLIC FACILITIES - The CMP does not adequately deal with trips generated by regionally significant public facilities such as major airports and harbors. Los Angeles International Airport and the Port of Los Angeles are unique public facilities serving the entire Southern California region. Additionally, the City of Los Angeles itself is a business center that serves the Southern California region, thus attracting trips from outside the County. As such, an impact analysis should be included for these public facilities that includes the impact of trips generated from outside the County of Los Angeles.

IX. CREDITS - The CMP should credit the City of Los Angeles for significant transportation improvements, which the city is helping to fund, such as Metrorail, lightrail, Metrolink, Alameda Transportation Corridor, and other projects that will take trucks off of the regional highway network. These credits must be clearly defined and quantified so that the credit bears a reasonable and understandable relationship to the local expenditure. The means by which these credits would be "spent" must be specified. Administration and "expenditure" of these credits should be entirely controlled by the local jurisdiction.

X. CUMULATIVE IMPACTS - The DEIR fails to adequately address the potential cumulative impacts of the CMP. Consideration of the project's long-term cumulative impacts, that might otherwise be slighted in a case-by-case analysis, is one of the primary purposes for preparing a Program EIR.

XI. REGIONAL MOBILITY PLAN - The LACTC seeks to tier the CMP EIR from the EIR that was prepared and adopted for the RMP in 1988, prior to the CMP's conception. The RMP EIR was not prepared as a programmatic document with the CMP in mind and the CMP EIR does not tier well from it. The LACTC should ensure that in those areas where the RMP does not address issues raised by the CMP, the CMP EIR provides adequate consideration of the CMP's impacts separate from the RMP.

The Southern California Association of Government (SCAG) is in the process of preparing their Regional Mobility Element (RME). TDM assumptions in the 1988 RMP might be changed drastically in the new RME. Basing the CMP EIR TDM (Transportation Demand Management) assumptions on SCAG's 1988 RMP may be unwise. We urge LACTC to consider updated population and TDM assumptions in the Countywide Deficiency Plan.

XII. MOVEMENT OF GOODS - The movement of goods is vital to the economic health of

the region yet is virtually ignored in the CMP. Providing efficient access to LAX and the Port of Los Angeles is critical to maintaining the standard of living we enjoy in Southern California.

Cont'd
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XIII. ADDITIONAL ANALYSES - The following analyses should be conducted and included in the CMP:

- a. The Growth Redistribution discussion fails to exhibit how the CMP would encourage increased concentration around transportation centers and corridors. Assembly Bill 3093 (Katz) exempts traffic generated by high-density residential developments located within a 1/4 mile of a fixed rail passenger station; and traffic generated by any mixed use development located within a 1/4 mile distance of a fixed rail, if more than 1/2 of the land area, or floor area, of the mixed use is used for high-density residential housing. The draft Joint Land Use/Transportation Policy discussed extending the radius of influence from 1/4 mile to 1/2 mile from transit stations; thus, the DEIR should address the impact of extending the 1/4 mile radius to a 1/2 mile radius. An analysis of the effectiveness of extending the 1/4 mile exemption for development around fixed rail passenger stations to 1/2 mile distance is required. This extended distance is consistent with the proposed Joint Land Use/Transportation Policy developed by the City of Los Angeles and LACTC.
- b. The CMP EIR proposes a model TDM ordinance, but does not analyze whether adoption of this ordinance by local agencies will achieve all or part of the RMP's TDM goal. Also, adoption of the TDM ordinance by April 1993 seems unrealistic; the EIR should consider a phased implementation approach.

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Installation of showers should also be addressed, and given credit, as a TDM measure.

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MDS13 / PD142

CITY OF LOS ANGELES
CALIFORNIA

ELIAS MARTINEZ
City Clerk

J. Michael Carey
Executive Officer

When making inquiries
relative to this matter
refer to File No.

90-2161-S2

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L.A.C.T.C.
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General Information - 485-5785

Pat Letcher
Chief Legislative Assistant

September 15, 1992

Los Angeles County
Transportation Commission
818 West 7th Street, Suite 1100
Los Angeles, CA 90017 ✓

Office of the Mayor,
Attn: Linda Waade
City Administrative Officer
Environmental Affairs Department
Chief Legislative Analyst
Transportation Department
Transportation Commission

RE: CITY REVIEW AND COMMENTS REGARDING THE DRAFT ENVIRONMENTAL IMPACT
REPORT FOR THE CONGESTION MANAGEMENT PROGRAM

At the meeting of the Council held September 1, 1992, the following
action was taken:

- Attached report adopted..... X
- " motion " ()..... _____
- " resolution " ()..... _____
- Ordinance adopted..... _____
- Motion adopted to approve attached report..... _____
- " " " " communication..... _____
- Mayor concurred..... 09-08-92
- Findings adopted..... _____
- Negative Declaration adopted..... _____
- Categorically exempt..... _____
- Generally exempt..... _____
- Tract map approved for filing with the County Recorder..... _____
- Parcel map approved for filing with the County Recorder..... _____
- Bond approved is No. _____ of Contract..... _____
- Resolution of acceptance of future street to be known as
_____ adopted..... _____
- Attach a copy of follow-up Department Report to file..... _____

Elias Martinez

City Clerk
mlb

902161.2

TO THE COUNCIL OF THE
CITY OF LOS ANGELES

Your TRANSPORTATION COMMITTEE

reports as follows:

Public Comments Yes No
XX —

TRANSPORTATION COMMITTEE REPORT relative to City review and comments regarding the Draft Environmental Impact Report for the Congestion Management Program.

Recommendation for Council action, as recommended by the Department of Transportation and the Environmental Affairs Department:

REQUEST the Mayor and the President of the City Council to TRANSMIT a letter to the Los Angeles Transportation Commission (LACTC) containing the City's comments/concerns relative to the City's review of the Draft Environmental Impact Report (DEIR) for the Congestion Management Program (CMP).

SUBJECT FILE TO BE TRANSMITTED TO THE MAYOR FORTHWITH

Summary

The State mandates that the Los Angeles County Transportation Commission (LACTC) adopt a Congestion Management Plan (CMP) by December 1, 1992. If the CMP for Los Angeles County is not adopted by that time, the State is authorized by the CMP legislation to withhold local Proposition 111 funds, which directly jeopardizes the estimated \$15 to \$20 million in gas tax funds projected for the City annually.

On August 27, 1992, the Transportation Committee considered a joint status report (dated 8-25-92) from the Department of Transportation (DOT) and the Environmental Affairs Department (EAD) outlining comments relative to the City's review of the Draft Environmental Impact Report for the Congestion Management Program. The comments (attached to the Council file) are intended to strengthen the Environmental Impact Report and City staff indicated that they will meet with LACTC to resolve outstanding issues.

Representatives of DOT and EAD explained that State law provides the City with a period of time to review and comment on the DEIR. Any comments/concerns transmitted to the LACTC are to be either incorporated into the final Environmental Impact Report or LACTC

provides the City with notice indicating the reason(s) for not incorporating said comments/concerns.

After reviewing the report and, with the addition of further comments, the Committee recommended that the President of the City Council and the Mayor jointly transmit a letter to LACTC containing the comments/concerns expressed during the DEIR critique period.

Respectfully submitted,

TRANSPORTATION COMMITTEE

KC
8/27/92
#902161S2



REPORT
ADOPTED

SEP 01 1992

LOS ANGELES CITY COUNCIL
TO THE MAYOR FORTHWITH

MAYOR WITH FILE

Letter 7 Response to Comments from T.A. Tidemanson, Director of Public Works and Carl L. Blum, Assistant Deputy Director, Department of Public Works, County of Los Angeles, September 10, 1992.

107. Comment noted.

108. The following is added following the sentence referencing Figure 5 on page 17 of the CMP EIR:

This figure shows the portions of the County's highway network currently experiencing LOS E or LOS F. The Figure indicates the direction of travel in which congestion is experienced and the relative length of the period of congestion expressed in the band width.

109. The CMP project was developed over the last several years in consultation with local jurisdictions, regional and State agencies, and other interested parties. The CMP was developed as a countywide planning framework to work toward the implementation of long range regional mobility goals. The Model TDM Ordinance was developed as a "TDM-friendly" facility based ordinance through extensive consultation with local jurisdictions and other interested parties. This approach was recommended as it is not often addressed by local jurisdictions and will complement employer based requirements of SCAQMD's Regulation XV. The TDM strategies also work toward the attainment of the AQMP, as these strategies are included as AQMP Transportation Control Measures. State law requires the Capital Improvement Program to be a seven year list of projects for State transportation funding. The Capital Improvement Projects included in the CMP have been reviewed by SCAG for regional consistency and air quality conformity and have been approved by the California Transportation Commission for State funding in the 1992 State Transportation Improvement Program. State law indicates, however, that the CTC's approval is contingent on these projects being included in the 1992 CMP adopted by LACTC by December 1, 1992. These projects also work toward the implementation of important regional facilities identified in the RMP.

Please refer also to Response to Comments 22, 23, 29, 30 and 61.

110. The Model TDM Ordinance was analyzed in the CMP EIR. Local jurisdictions adopting the model ordinance will be able to reference the CMP EIR during their local environmental review process.



THOMAS A. TIDEMANSON, Director

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (818) 458-5100

226296 SEP 11 1992
ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

MICROFILMED
COPY IN RMC

September 10, 1992

IN REPLY PLEASE
REFER TO FILE:

P-4

Ms. Kendra Morries
Land Use Project Manager
Los Angeles County Transportation Commission
818 West Seventh Street (M/S 2200)
Los Angeles, CA 90017

Dear Ms. Morries:

RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT REPORT 1992 LOS ANGELES COUNTY CONGESTION MANAGEMENT PROGRAM

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the 1992 Los Angeles County Congestion Management Program (CMP). Although we have not completed the review of the Draft EIR, we offer the following comments:

1. As a program level EIR, the mitigation measures are generalized prescriptive procedures rather than specific courses of action. We believe this approach is acceptable, since project level EIRs will identify specific mitigation measures.
2. Figure 5 on page 12, needs some clarification on what the symbols indicating congestion along highways mean. Why are some only shown on one side of the highway? Does the thickness of the symbol have some significance? What does it mean when two different symbols are side by side?
- 3) The TDM Intensive Alternative would attempt to achieve acceptable levels of service on the CMP Highway Network with very stringent TDM measures and would not include any capital improvements. The Capital Intensive Alternative would attempt to relieve congestion strictly with capital improvements and no TDM measures. The CMP project falls somewhere in between these two alternatives because it includes both TDM measures and Capital projects. It is not clear how the mix of TDM and Capital project components were determined to create the most effective program from a traffic and air quality standpoint. Any number of alternatives with different TDM/Capital improvements mixes could have been considered. The rationale for selection for the CMP project should be stated.

107

108

109

Ms. Kendra Morries
September 10, 1992
Page 2

- 4) At this point, it is not clear what level of environmental documentation will be required for the Phases I and II TDM ordinances that Cities and County are expected to adopt. Please indicate whether an EIR would be necessary and if so, could it be tiered from the CMP EIR.

If you have any questions, please contact Mr. Barry Witler of our Planning Division at (818) 458-4351

Questions regarding the environmental reviewing process of this Department can be directed to Ms. Clarice Nash at the above mailing address or at (818) 458-4334.

Very truly yours,

T. A. TIDEMANSON
Director of Public Works



CARL L. BLUM
Assistant Deputy Director
Planning Division

MA:aa
WP/159

110

**Letter 8 Response to Comments from Donald O. Manning, Chief Engineer and
General Manager, Department of Fire, City of Los Angeles, August 26, 1992.**

111. Comment noted.



CITY OF LOS ANGELES
CALIFORNIA

BOARD OF
FIRE COMMISSIONERS
485-6032

JAMES E. BLANCARTE
PRESIDENT
CARL R. TERZIAN
VICE-PRESIDENT
AILEEN ADAMS

NICHOLAS H. STONNINGTON
KENNETH S. WASHINGTON

EVA WHITELOCK
EXECUTIVE ASSISTANT



TOM BRADLEY
MAYOR

DEPARTMENT OF FIRE
200 NORTH MAIN STREET
LOS ANGELES, CA 90012
DONALD O. MANNING
CHIEF ENGINEER
AND
GENERAL MANAGER

August 26, 1992

Kendra Morries, Project Coordinator
Congestion Management Program
Los Angeles County
Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Dear Ms. Morries:

Draft Environmental Impact Report
Congestion Management Program

All items appear to have been addressed adequately at earlier levels of review.

For any additional information, please contact our Hydrant Unit, at (213) 485-5964.

DONALD O. MANNING
Chief Engineer and General Manager

Dal L. Howard, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

DLH:ASM:cr:3140E

- cc: Mike Hernandez, First Council District
- Joel Wachs, Second Council District
- Joy Picus, Third Council District
- John Ferraro, Fourth Council District
- Zev Yaroslavsky, Fifth Council District
- Ruth Galanter, Sixth Council District
- Ernani Bernandi, Seventh Council District
- Mark Ridley-Thomas, Eighth Council District
- Rita Walters, Ninth Council District
- Nate Holden, Tenth Council District
- Marvin Braude, Eleventh Council District
- Hal Bernson, Twelveth Council District
- Michael Woo, Thirteenth Council District
- Richard Alatorre, Fourteenth Council District
- Joan Milke Flores, Fifteenth Council District
- Environmental Affairs Commission
- Fire Department Planning Section

111

113

Letter 9 Response to Comments from Colleen Egbert, CEQA Manager, City of Culver City, September 9, 1992.

112. Specific comments are addressed in Response to Comments 113-144 below.
113. Please refer to response to Comment 62.
114. Comment noted. Specific issues are addressed in Response to Comments 115-144 below.
115. The CMP EIR describes the alternatives at a program level of specificity. As noted in Chapter V of the CMP EIR, the alternatives are tiered from the alternatives contained in the RMP EIR. A summary of the quantitative analysis of the RMP alternatives is included in Table 26 of the CMP EIR (see pages 153-163). As did the RMP EIR, the CMP EIR includes a TDM Intensive Alternative and a Capital Intensive Alternative. These CMP alternatives fit within the general framework of the adopted RMP strategy. The more capital intensive and TDM alternatives of the RMP are used to provide a sense of how the CMP Capital Intensive and TDM Intensive alternatives compare to the more balanced strategy of the CMP, since like the CMP, the adopted RMP is the more balanced of the strategies analyzed in the RMP EIR.
116. All comments received in response to both the December 1991 Notice of Preparation and the revised February 1992 Notice of Preparation were reviewed and considered in the development of the CMP EIR and the Final Draft CMP released in September 1992.
117. These projections are currently the adopted regional projections contained in the RMP, with which the CMP is required by law to be consistent. SCAG is currently updating these projections and the RMP, and subsequent CMP's will be consistent with the appropriate RMP update. SCAG's preliminary results, however, do anticipate an increase in forecasted population rather than a decrease.
118. Please refer to Response to Comment 117.

119. The CMP EIR is tiered from the RMP EIR. The RMP EIR discussed the potential aesthetic impacts associated with the same capital improvement projects that are included in the CMP (see pages 86-97 of the RMP EIR). Since the analysis remained valid, it was incorporated by reference and not repeated in the CMP EIR.

Although CIP projects are identified in the CMP, they are at an insufficiently advanced stage of planning to permit analysis of their effects on aesthetics. Individual CIP facilities will be subject to project-level environmental review when they reach a stage of design which will permit the effective analysis of their environmental effects. Similarly, development projects are subject to review, including CEQA review, by local jurisdictions, and may be subject to conditions addressing aesthetic impacts by the affected jurisdiction.

120. The analysis of alternative land use scenarios, such as high density development around rail stations and requirements for addressing deficiencies on the CMP system will be addressed in the Countywide Congestion Study. The results of the Countywide Congestion Study will be incorporated into the 1993 CMP, which will be subject to further environmental analysis.

121. Please refer to Response to Comment 120.

122. The CMP EIR is a program level EIR. The level of analysis required to evaluate Human Health impacts will be conducted as part of the environmental assessment of specific CMP CIP projects.

Although CIP projects are identified in the CMP, they are at an insufficiently advanced stage of planning to permit analysis of their effects on human health. Individual CIP facilities will be subject to project-level environmental review when they reach a stage of design which will permit the effective analysis of their environmental effects. Similarly, specific development projects are subject to review, including CEQA review, by local jurisdictions, and may be subject to conditions addressing human health impacts by the affected jurisdiction.

123. LACTC concurs that coordination with the AQMD is important in the CMP process. This is a statutory responsibility of the CMP which is reflected in the related AQMD discussion in Chapter 3 of the CMP on Roles and Responsibilities (Final Draft CMP, September 1992). Extensive coordination is currently occurring between the AQMD, SCAG, and the four County Transportation Commissions in providing incentives for local jurisdictions to implement local TDM responsibilities. While this discussion is separate from the CMP requirement, it will build on the existing model TDM ordinance and will be developed to avoid duplication or overlap with CMP requirements.
124. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires. Under the CMP, local jurisdictions retain discretion for selecting appropriate mitigation strategies (see Final Draft CMP, September 1992).

Please refer also to Response to Comments 3, 26, 33 and 64.

125. Please refer to response to Comment 124.
126. Footnote 8 provides only an example of such plans. Other jurisdictions have similar policies aimed at creating centers of activity.
127. The need for mitigation to address the impacts of increased density centers would be addressed by local jurisdictions as part of their land use planning and permitting process and associated environmental review.

Please refer also to response to Comment 3.

128. The transit performance standards establish a network for monitoring purposes. The purpose of the CMP statutory requirement for transit performance standards is to encourage the utilization of transit services that compliment the CMP highway system in the attainment of highway level of service standards. To that end, a transit monitoring network was developed identifying transit lines that currently operate along five miles or more of the CMP highway system, and are within the boundaries of the LACTC Congested Corridor Action Plan (the Congested Corridor Action Plan can be obtained separately from the Commission upon request). The performance standards will assist LACTC in monitoring transit capacity and usage by transit corridor. Information regarding transit capacity and usage by corridor will be one factor considered by LACTC in making funding recommendations for the Short Range Transit Plan and the local Transportation Improvement Program.

The transit element is consistent with CMP Policy Statements listed in Chapter 2 of the CMP as described below:

- 1) It is part of the basic core CMP program, consistent with statutory requirements.
 - 2) Transit monitoring requirements make use of existing data collected necessary for meeting State and federal funding responsibilities. No new data collection requirements need to be established.
 - 3) The transit element encourages coordination between transit providers; and transit operators and local jurisdictions through the transit review process outlined in the CMP Model TDM Ordinance.
 - 4) The results of transit monitoring will be incorporated into other LACTC transportation planning processes.
129. LACTC has taken action not to require the installation of showers as a minimum TDM requirement in the model TDM Ordinance. No significant impacts are anticipated by the provision of bicycle racks since the cost of providing these facilities represent a very minor cost addition for affected developments.
130. As is stated in the CMP policy, the intent of the CMP program is to develop a core program, and one that minimizes local impact. The CMP has been developed through an extensive consultation process to ensure that these goals were attained. Significant local comment has been instrumental in forming local CMP responsibilities that minimize the administrative impact on jurisdictions blending CMP requirements with existing local transportation analysis and CEQA responsibilities. The impact of the CMP on local jurisdictions will vary by jurisdiction, as individual local jurisdictions have different procedures for implementing their transportation and land use responsibilities. LACTC will work closely with local jurisdictions to assist in smooth and cost-effective implementation of CMP responsibilities.
131. These are parks located within approximately one mile of the CMP highway system network.

132. The CMP EIR discussion on Page 145 does not refer to a mitigation fee, but to CMP deficiency plan requirements to either mitigate or measurably improve mobility.

Please refer also to Response to Comment 3 which indicates that LACTC is not pursuing a fee approach to address deficiency plan requirements.

133. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires. Additional time and expense to complete the evaluation is therefore not expected to be significant. Thus the Transportation Impact Analysis procedure does not result in a significant economic impact.

Please refer also to Response to Comments 26, 33, 64, 84, 92 and 94.

134. Implementation of the CMP will provide valuable information for ongoing and planned updates of regional plans such as the Regional Mobility Plan and Air Quality Management Plan. However, adoption of the CMP does not in itself necessitate modification of these plans.

135. The analysis of the impact of increased density around transit centers and along transit corridors would be conducted at the project level regarding specific plans, development proposals, as well as for specific transportation improvements. Considerable interest has been shown in centers concepts on the part of various jurisdictions that have participated in the CMP development process.

Please refer also to Response to Comments 3, 33, 64, 84, 92 and 94.

136. Figure 2 on page 9 has been corrected so that the outline of Culver City between the 405 freeway and Marina Place goes downward.

137. According to CEQA Public Resources Code Section 15206, the following are considered projects of statewide, regional or areawide significance:

(1) A proposed local general plan, element or amendment thereof for which an EIR was prepared. If a negative declaration was prepared for the plan, element or amendment, the document need not be submitted for review.

(2) A project has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located. Examples of the effects include generating significant amounts of traffic or interfering with the attainment or maintenance of state or national air quality standards. Projects subject to this section include: (A) A proposed residential development of more than 500 dwelling units. (B) A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. (C) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space. (D) A proposed hotel/motel development of more than 500 rooms. (E) A proposed industrial, manufacturing, or processing plant or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.

(3) A project which would result in the cancellation of an open space contract made pursuant to the California Land Conservation Act of 1965 (Williamson Act) for any parcel of 100 or more acres.

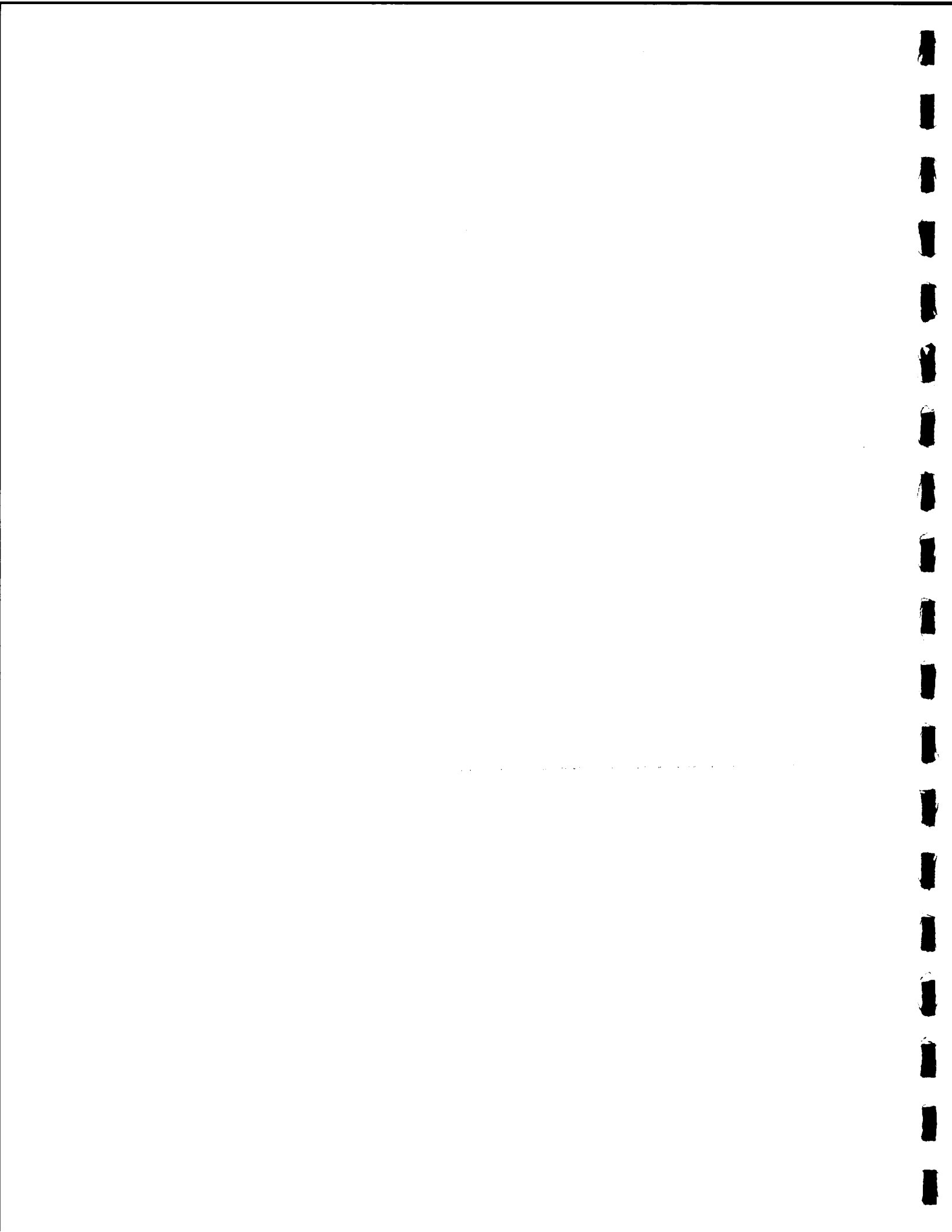
(4) A project for which an EIR and not a negative declaration was prepared which would be located in and would substantially impact the following areas of critical environmental sensitivity: (A) The Lake Tahoe Basin. (B) The Santa Monica Mountains Zone as defined by Section 74663 of the Government Code. (C) The California Coastal zone as defined in, mapped pursuant to, Section 30103 of the Public Resources Code. (D) An area within 1/4 mile of a wild and scenic river as defined by Section 5093.5 of the Public Resources Code. (E) The Sacramento-San Joaquin Delta, as defined in Water Code Section 12220. (F) The Suisun Marsh as defined in Public Resources Code Section 29101. (G) The jurisdiction of the San Francisco Bay Conservation and Development Commission as defined in Government Code Section 66610.

(5) A project which would substantially affect sensitive wildlife habitats including but not limited to riparian lands, wet lands, bays, estuaries, marshes, and habitats for rare and endangered species as defined by Fish and Game Code Section 903.

(6) A project which would interfere with attainment of regional water quality standards as stated in the approved areawide waste treatment management plan.

(7) A project which would provide housing, jobs or occupancy for 500 or more people within 10 miles of a nuclear power plant.

138. Please refer to Response to Comment 68.
139. The last line on page 40 of the CMP EIR is corrected to read:
"constitution for all future developments within the city or county" to
which any local decision
140. The reference to "Ballons Creek" on Table 22 on page 122 is corrected to read:
Ballona Creek
141. The following park is added to Table 24 at the bottom of page 140:
Media Park Culver City
142. In Appendix F-5 McManus Park is changed to read:
Syd Kronenthal Park
143. For ease of reproduction, all graphics were produced at 8 1/2 X 11 scale. The
CMP staff has on file copies of the graphics at a larger scale. These are available
for inspection in the Commission offices located at 818 West Seventh Street, Los
Angeles, 90017.
144. See Response to Comment 70 which adds this list to Appendix E of the CMP
EIR.





CITY OF CULVER CITY

4095 OVERLAND AVENUE • P.O. BOX 507
CULVER CITY, CALIFORNIA 90232-0507

September 9, 1992

Ms. Kendra Morries
Land Use Project Manager
Los Angeles County Transportation Commission
818 West 7th Street
Los Angeles, CA 90017

RE: Comments Regarding Draft Environmental Impact Report (EIR) for
the Los Angeles County Congestion Management Program (CMP),
State Clearinghouse No. 91121063

Dear Ms. Morries:

Culver City appreciates the opportunity to comment on the draft EIR for
the Los Angeles County CMP. City staff has reviewed the draft EIR and
our comments are enclosed.

If you have questions on the comments, please call me at (310) 280-5949
or Joan Kassan, City Intergovernmental Relations Officer, at (310) 202-
5787.

Sincerely,

COLLEEN EGBERT
CEQA Manager

CE:JK/mdk
Enclosure

Copy: List Attached

112

Ms. Kendra Morries
September 9, 1992
Page #2

Copy: Culver City Mayor and Councilmembers
Pauline Dolce, City Clerk
Jody Hall-Esser, Chief Administrative Officer
Norman Herring, City Attorney
Evelyn Keller, Deputy City Attorney
Mark Winogron, Community Development Director
David Ashcraft, Transportation Director
James Davis, City Engineer
Jay B. Cunningham, City Planner
Joan Kassin, Intergovernmental Relations Officer
Carol DeLay, Deputy City Planner
John Rivera, Associate Planner
Susan Rizenman, Sr. Management Analyst
Ken Johnson, Consulting Traffic Engineer

CMP DRAFT EIR COMMENTS

Submitted By: City of Culver City

City Contact: Colleen Egbert, (310) 280-5949
Joan Kassan, (310) 202-5787

1. **General Comment 1:** Since release of the Final Draft CMP in August 1991, many of the assumptions, policies and procedures included in that document have undergone significant revisions which have not yet been fully formulated. While Culver City supports and appreciates this continuing CMP process, it has resulted in an unclear project description from which to evaluate the DEIR. The components and underlying statutory purposes of the CMP are stated; however, there is insufficient information about the actual functioning of the CMP. The project description needs to be clearer concerning the role of LACTC as the Congestion Management Agency (CMA) and the feasibility of achieving mitigation measures. Such information is needed to identify the impacts of the CMP and to determine whether they have been adequately addressed.

2. **General Comment 2:** In addition to the undeveloped project description, the resulting DEIR is too vague and repetitive with excessive reliance upon stating statutory requirements and program goals. Assertions are made without adequate, balanced analyses. This approach tends to make the DEIR an advocacy, rather than an information, document.

The DEIR does not provide sufficient information to adequately describe each of the alternatives and differences between alternatives. It is impossible to assess the differences in impacts of each alternative and how or why the selected program is clearly the best. Factual data should be included to validate the conclusions

3. **General Comment 3:** Given the short (less than 14-day) time frame between the close of the comment period on the revised NOP and the release of the DEIR on July 27, 1992, it seems unlikely that LACTC had sufficient time to consider the concerns raised by Culver City and other responsible agencies. The following issues raised by Culver City in comments on the NOP/RNOP were not adequately addressed in the DEIR:

Comment 3 a.: The issues raised addressing tiering the environmental analyses off the 1988 RMP EIR are still of concern. Although tiering from the RMP EIR was recognized in the revised NOP to have limitations, the CMP DEIR

does not include adequate assessments of the validity of the underlying 1988 assumptions and data to the needs of the 1992 DEIR. Are the assumptions and realities of 1988 still current and realistic? There has been no apparent check of the validity of the RMP EIR, which used 1984 SCAG forecasts, by comparing available 1990 census data.

118

Comment 3 b.: There is no discussion of the City's concern that "Aesthetics" has not been included in the DEIR.

119

Comment 3 c.: The DEIR does not adequately discuss the City's comments concerning proposed CMP policies encouraging increased densities along transit corridors especially at transit stations for both residential and mixed-use development.

120

Comment 3 d.: The DEIR does not adequately address the City's comment concerning the effects of slowed or reduced development on City/County economies resulting from potential financial or other development restrictions. If this, or other issues, is proposed for the 1993 CMP update EIR, such assurances should be forthcoming in a "response to comments" section of the EIR.

121

Comment 3 e.: The DEIR does not address the City's comment concerning omitting any discussion of "Human Health" in the DEIR, specifically concerning the impacts of transmission lines requiring further study if they are proposed for any future transit corridor.

122

COMMENTS REGARDING "GOALS AND OBJECTIVES", pages 15-17:
The goals stated for the CMP process do not include coordination with the SCAQMD. Local jurisdictions and businesses must address both CMP and SCAQMD requirements which could overlap or, potentially, be in conflict. The coordination of CMP-SCAQMD policies should be a primary goal since these requirements have both significant environmental and economic impacts.

123

COMMENTS REGARDING "ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION":

Pages 43, 44: It is implied, in this section and throughout, that the CMP is negligible in producing growth patterns that could be different than regional development market forces. Yet there is no analysis that traffic studies, required mitigation measures to be imposed when intersections are at LOS E, also act as factors to induce growth in areas not contemplated by the regional plans.

124

The unsupported assertions on pages 44, 144 and elsewhere are not adequate. Reasons are given, but they are not balanced by counterarguments nor are they supported by recent data.

- **Page 47:** It is stated that a number of land use plans include development of higher density mixed use centers. Are these plans limited to the County and City of Los Angeles, as footnote 8 suggests, or are there other jurisdictions that include the centers concept? 125
- **Page 49:** One aspect of increased density centers which is not discussed is the infrastructure demands that cannot be mitigated such as increased fire and police personnel, additional open space, schools, utilities, etc. This should be acknowledged in the general discussion. 126
- **Page 56:** The lack of ridership projections makes it difficult to critique the assertions on CMP impacts. 127
- **Page 57:** There is no discussion as to the effects of the requirement of projects having to provide bicycle racks and shower facilities. 128
- **Pages 137-142 Public Services:** This entire section inadequately addresses potential impacts on local governments' services. The intent to assess this subject was stated in the Revised Initial Study (included as Appendix B), pages 21-22; however, the Public Services section provides an extremely narrow definition of services. The section inadequately addresses impacts of local jurisdictions' participation in the CMP process - highway monitoring, land use, plan reviews, traffic impact analyses, deficiency plan process, etc. 129
- The DEIR does not adequately address the City's comment concerning CMP impacts on local governments. The Public Service section of the DEIR does not realistically or adequately discuss the potential impacts on local governments' resources. This concern was raised as comment #1 in the City's January 20, 1992 letter responding to the NOP. 130
- **Page 141, Table 24:** What were the criteria for determining parks "in proximity to the CMP roadway network"? No Culver City parks are included. 131

- **Page 145:** The exact status of any CMP mitigation fee is unclear at this time; however, there are references in the DEIR which assume developers may have such a requirement under unspecified circumstances. Since the current direction from the Commission prohibits a County fee, such references must be to locally-imposed fees. The impacts of such potentially variable fees on local economies should be fully addressed.

132

COMMENTS REGARDING "IMPACT OVERVIEW"

- **Pages 144-151:** The analysis quickly concludes that market forces are more powerful in determining where growth will occur. There should be a discussion as to the effects of the CMP in its possible growth inducements in geographical areas previously not considered. The discussion should take into account the impacts of developers paying for traffic studies, mitigation measures and the time and cost involved in completing such requirements. Do any of the regional plans need to be modified in order to include discussion of the CMP?
- **Page 146:** Additional analysis is needed in determination of the impacts of increased density near transportation centers and corridors. What is the basis of the statement that "most jurisdictions are interested in increasing density in center areas"?

133

134

135

THE FOLLOWING COMMENTS CONCERN CORRECTIONS TO THE DEIR

- **Page 9 Figure 2:** The outline of Culver City is inaccurate. The segment between the 405 freeway and Marina Place should go "downward".

136

LAND USE ANALYSIS PROGRAM

- **Page 28:** The CEQA section of the Public Resources Code, which defines "regionally significant" (Section 15206) should be cited and summarized.
- **Page 29:** Will the LACTC provide a model format for the required land use programs, which must be adopted by local jurisdictions within 120 days of CMP adoption?

137

138

LOCAL PLANS

- **Page 40:** The general plan is considered the "constitution" not "construction" for all future development.

139

- Page 122: "Ballona Creek" is incorrectly referred to as "Ballons Creek". 140
- Page 124: Same comment as that described regarding page 122. 141
- Table 24: Media Park has been omitted (borders Venice Boulevard). 142
- Appendix F-5: Update McManus Park to Syd Kronenthal Park. 143
- Figures # 2, 4, 5, 6, 8, 17, 18 should be large enough to be readable, such as 8 1/2 x 14. 144
- Cultural Resources: Culver City Cultural Resources are not included. The list of structures in the area of the CMP Network, designated as Cultural Resources pursuant to Culver City Municipal Code Chapter 38, the Culver City Historic Preservation Program, is attached.

ATTACHMENT A

STRUCTURES DESIGNATED PURSUANT TO THE
CULVER CITY HISTORIC PRESERVATION PROGRAM

"LANDMARK" STRUCTURES*

1. 9355 Culver Boulevard (Citizen Building) **
2. 9820 Washington Boulevard (Culver Theater)
3. 9400 Culver Boulevard (Culver Hotel)
4. 5879 Washington Boulevard (King's Tropical Inn)
5. 8703-35 Washington Boulevard (Helms Building)
6. 10195 Washington Boulevard (St. Augustine's)
7. 11333 Washington Boulevard
8. 9720-30 Washington Boulevard (Washington Building) **
9. 9543 Culver Boulevard (Hull Building)
10. 4052-A LaFayette Place Res, Dist
11. 4052-B LaFayette Place Res, Dist
12. 4052-C LaFayette Place Res, Dist
13. 4058-A LaFayette Place Res, Dist
14. 4058-B LaFayette Place Res, Dist
15. 4058-C LaFayette Place Res, Dist
16. 4068-A LaFayette Place Res, Dist
17. 4068-B LaFayette Place Res, Dist
18. 4068-C LaFayette Place Res, Dist
19. 4070-A LaFayette Place Res, Dist
20. 4070-B LaFayette Place Res, Dist
21. 4070-C LaFayette Place Res, Dist
22. 4121 Wade Street Res
23. 4245 Duquesne Street Res
24. 4191 Lincoln Avenue Res

"SIGNIFICANT" STRUCTURES*

1. 3927 Van Buren Place (West End Hotel, formerly Washington Hotel)
2. Moderne School - 3430 McManus Avenue
3. 3824 Hughes Avenue (Legion Building)
4. 8695 Washington Boulevard (Beacon Laundry)
5. 10722 Washington Boulevard
6. 9050 Washington Boulevard
7. 5788-90 Washington Boulevard

"RECOGNIZED" STRUCTURES*

1. 9942 Culver Boulevard (Post Office)
2. 10858 Culver Boulevard (VFW)
3. 3832 Jasmine Avenue (Convent)
4. 3850 Jasmine Avenue (Rectory)
5. 9400-10 Washington Boulevard
6. 11300-04 Venice Boulevard

** Also listed on the Federal National Register of Historic Places

ATTACHMENT A

7.	12400-04 Washington Boulevard		
8.	9540 Washington Boulevard		
9.	5812 Washington Boulevard		
10.	11027 Braddock Drive	Res,	Dist
11.	11033 Braddock Drive	Res,	Dist
12.	11034 Braddock Drive	Res,	Dist
13.	11037 Braddock Drive	Res,	Dist
14.	11043 Braddock Drive	Res,	Dist
15.	11047 Braddock Drive	Res,	Dist
16.	4173 McConnell Boulevard	Res,	Dist
17.	4128 McConnell Boulevard	Res,	Dist
18.	4132 McConnell Boulevard	Res,	Dist
19.	4138 McConnell Boulevard	Res,	Dist
20.	4148 McConnell Boulevard	Res,	Dist
21.	4150 McConnell Boulevard	Res,	Dist
22.	4141 McConnell Boulevard	Res,	Dist
23.	4154 McConnell Boulevard	Res,	Dist
24.	4158 McConnell Boulevard	Res,	Dist
25.	4160 McConnell Boulevard	Res,	Dist
26.	4161 McConnell Boulevard	Res,	Dist
27.	4163-65 McConnell Boulevard	Res,	Dist
28.	4166 McConnell Boulevard	Res,	Dist
29.	4177 McConnell Boulevard	Res,	Dist
30.	4181 McConnell Boulevard	Res,	Dist
31.	4105 Lincoln Avenue	Res	
32.	3823 Girard Avenue	Res	
33.	4222 Keystone Avenue	Res	
34.	4115 Van Buren Place	Res	
35.	4117-19 Higuera Street	Res	
36.	4133-35 Duquesne Street	Res	
37.	3914-16 Huron Avenue	Res	
38.	9031-33 Krueger Street	Res	
39.	4058 Madison Avenue	Res	
40.	4058 Lincoln Avenue	Res	
41.	4210 Lincoln Avenue	Res	
42.	4122 Van Buren Place	Res	
43.	4019 Wade Street	Res	
44.	4144-46 LaFayette Place	Res	
45.	4190 Lincoln Avenue	Res	
46.	9054-56 Carson Street	Res	
47.	9034 Krueger Street	Res	
48.	9058 Carson Street	Res	
49.	4041 LaFayette Place	Res	
50.	4114 LaFayette Place	Res	
51.	4125 LaFayette Place	Res	
52.	3923 Prospect Avenue	Res	
53.	4105 Duquesne Avenue	Res	
54.	4151-53 Duquesne Street	Res	
55.	4154-56 Duquesne Street	Res	
56.	4077 Lincoln Avenue	Res	
57.	4155 Madison Avenue	Res	
58.	10412 Park Avenue	Res	
59.	10852 Wagner Street	Res	
60.	11215 Barman Avenue/4373 Tuller	Res	
61.	4214 Madison Avenue	Res	

ATTACHMENT A

62. 9026 Carson Street	Res
63. 11373 Herbert Street	Res
64. 3535 Schaefer Street	Res
65. 4230 Irving Place	Res
66. 4049 Madison Avenue	Res
67. 4179-81 Madison Avenue	Res
68. 10865 Pickford Way	Res
69. 10834 Oregon Avenue	Res

STUDIO PROPERTIES

The Culver Studios

"Landmark"

1. Mansion Building and Ince Appendage

"Significant"

1. Bungalow S
2. Bungalow T
3. Bungalow U
4. Bungalow V

Columbia Studios

"Landmark"

1. Thalberg Building
2. The Colonnade

"Significant"

1. Crawford Building (Schoolhouse)
2. Sound Stages 3 4, 5, 6
3. Jean Harlow Building (Art Deco portion)
4. Garland Building
5. Tracy Building
6. Hepburn Building
7. Myrna Loy Building
8. Gable Building
9. Commissary
10. Water Tower

*Note: Res = Residential
 Dist = Historic District

hpaclst.jk2
 jk/brc

Letter 10 Response to Comments from George A. Miller, Director of Public Works, City of Glendale, September 9, 1992.

145. Potential land use impacts discussed in the CMP EIR occur as a result of local mitigation actions or Capital Improvement Programs. Such impacts are most appropriately addressed at the project level rather than at the program level. The CMP EIR includes mitigation measures to ensure that such project specific EIR's for CMP CIP projects address these issues (see Table S-1 in the CMP EIR).

Please refer also to Response to Comments 26, 33, 64 and 84.

146. The CMP CIP element is consistent with the RMP. The CMP EIR therefore incorporated, by reference, the related evaluations done in the RMP EIR. Although CIP projects are identified in the CMP, they are at an insufficiently advanced stage of planning to permit analysis of their effects on urban concentration and deconcentration. Individual CIP facilities will be subject to project-level environmental review when they reach a stage of design which will permit the effective analysis of their environmental effects.

147. On Table 4, Page 25 of the CMP EIR, reference to Glendale Avenue is changed to read:

Glendale Boulevard

148. Figure 16 in the CMP EIR is revised as indicated:

The vertical Y axis label shall be changed to read "Maximum 1-Hour Concentration in ppm

149. The text on page 76 of the CMP EIR is revised as follows:

The last sentence beginning with "TSP levels..." in paragraph 1 on page 76 shall be deleted.

150. On pages 129 and 131 of the CMP EIR, the reference to Appendix D is changed to read:

Appendix E

151. See Response to Comment 150 which makes the requested change and Response to Comment 70 which adds the list of Glendale's historic sites to Appendix E and requires consideration of locally designated resources in project level environmental reviews of CIP projects.

CITY OF

Glendale CALIFORNIA

633 East Broadway, Room 209, Glendale, CA 91206-4385

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September 9, 1992

Director of
PUBLIC WORKS

Bradford W. McAllestor
Los Angeles County Transportation Commission
Congestion Management Program Manager
818 W. Seventh Street
Suite 1100
Los Angeles, CA 90017

Dear Mr. McAllestor:

Thank you for the opportunity to comment on the CMP/EIR. The City of Glendale has received the subject EIR and has the following comments:

Public Works Comments:

1. The CMP/EIR should further analysis the impacts of TDM, TSM, and Transit elements as mitigation measures, in addition to the Capital Improvement Program Elements.
2. The EIR needs to quantify the impact of the CIP on the CMP network. The impact could be addressed by using CMP network modeling.

Planning Division Comments:

1. Page 25 - Table 4, Route 2 should have Glendale Boulevard listed, not Glendale Avenue.
2. Page 27 - Table 4 - Route 710 should have Alameda Street listed, not Alameda Avenue.
3. Pages 67, 68, 73, and 74 - Figures 11, 12, 15, and 16 should be labeled to indicate maximum concentrations of pollutants.
4. Page 76 - TSP levels in the San Fernando Valley are listed twice in the same table with conflicting numbers.
5. Page 129 - National Register sites are found in Appendix E, not Appendix D.

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PRINTED ON RECYCLED PAPER

Letter to Mr. McAllestor
September 9, 1992
Page Two

6. Page 131 - Los Angeles Historic Cultural Monuments are found in Appendix E, not Appendix D. In addition to local landmarks designated by the City of Los Angeles, locally designated landmarks from other cities should also be indicated in Appendix D. Attached is a list of sites included in Glendale's Historic Preservation Element and their addresses.
7. Page 132 - Table 23 should incorporate designated sites from all localities. As noted earlier, Glendale's locally designated sites are attached.

Sincerely,


George A. Miller
Director of Public Works

GAM:cf

Attachment

TE3(373)

151

Historic Preservation Element Sites
City of Glendale, California

First Order Criteria

Oak of Peace and Verdugo Adobe	2211 Bonita Drive
Casa Adobe de San Rafael	1330 Dorothy Drive
The Taylor House	1027 Glenwood
The Richardson House	1281 Mariposa Street
The Doctor's House	Brand Park
El Miradero	Brand Park
The Goode House	119 North Cedar
Egyptian Village Cafe	131-133 North Brand Bl
The Toll House	1521 North Columbus Avenue
The Southern Pacific Railroad Depot	400 Cerritos Avenue

Second Order Criteria

The Inter-Valley Ranch	Northerly terminus of Dunsmore Avenue
The Statue of Miss Green Cross	(Behind) Brand Library
The G.A.R. Meeting Hall	902 South Glendale Avenue
The Elks Club	120 East Colorado Street
The Masonic Temple	234 South Brand Bl
Glendale Y.M.C.A.	140 North Louise
Tuesday Afternoon Club	400 North Central Avenue
Security Trust and Savings Bank	100 North Brand Bl
Glendale Hotel	701-707 East Broadway
Harrower Lab	920 East Broadway
Grand Central Airport Tower	1310 Air Way
Alex Theatre	216 North Brand Bl
Holy Family Roman Catholic Church	214 East Elk
First Baptist Church	207 North Louise
First Church of Christ, Scientist	500 South Central Avenue
The Jones House	727 Kenneth Road
The Derby House	2535 East Chevy Chase Drive
The Calori House	3021 East Chevy Chase Drive
The Rodriguez House	1845 Niodrara
Homeland	1405 Mountain
The Brockman Clock Tower	(150 ft. northeast of) 1605 Arbor Road
Lorelei	330 Kempton Road
The Walters House	3000 Sparr Boulevard

Letter 11 Response to Comments from Alicia Ley, Assistant to City Manager/Planning Director, City of Artesia, September 8, 1992.

- 152. Please refer to Response to Comment 3.
- 153. Please refer to Response to Comment 3.
- 154. Yes, since the underlying demographic model used by these agencies is the SCAG model.
- 155. These projections are currently the adopted regional projections contained in the RMP, with which the CMP is required by law to be consistent. SCAG is currently updating these projections and the RMP, and subsequent CMP's will be consistent with the appropriate RMP update. SCAG's preliminary results, however, do anticipate an increase in forecasted population rather than a decrease.
- 156. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires. Additional time and expense to complete the evaluation is therefore not expected to be significant. Thus the Transportation Impact Analysis procedure does not result in a significant economic impact.

Please refer also to Response to Comment 3.

- 157. Please refer to Response to Comment 3.



LC101 11

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THE CITY OF ARTESIA, CALIFORNIA

18747 CLARKDALE AVENUE, ARTESIA, CALIFORNIA 90701
226243 SEP 10 89 Telephone 213/865-6262

"Service Builds Tomorrow's Progress"

September 8, 1992

Ms. Kendra Morries
LACTC
818 West Seventh St.
Los Angeles, California 90017

RE: Draft EIR for the CMP

Dear Ms. Morries:

The City of Artesia Planning Department has received and reviewed the Draft EIR for the Congestion Management Program (CMP). We concurrently support LACTC's efforts to reduce congestion and improve air quality in the Los Angeles region. During the review of the Draft EIR, we identified the following issues that concerns the City of Artesia:

1. The collection of a fee by the City of Artesia to fund road improvements on a regional network is a concern to the City. The CMP EIR must address potential economic impacts associated with a new mitigation fee imposed on new development. If the City does not implement this measure during the first year, what steps will LACTC take to ensure compliance? If a development fee is implemented, will this fee be used to fund CMP CIP projects and projects listed on the Nexus Study? The City believes that we should maximize the use of this fund on City roads that are deemed to be regionally significant.
2. What happens to jurisdictions who do not implement nor enforce a development fee until the 1993 CMP Revision? An evaluation of the consequences for not imposing a mitigation fee should be identified in the Plan.
3. A concern regarding the integration of the AQMP TCM into the CMP TDM ordinance. Since the District provides CTC with the quantification methodology, is this methodology consistent with LACTC, SCAQMD and SCAG in regards to population growth, employment growth, housing growth and their relationship to vehicle emission reductions? Does this methodology allows the City with the flexibility to make any appropriate changes to the data or are the numbers locked in?

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4. A project must be analyzed for regional transportation impacts under the existing CEQA requirements. If any mitigation is needed, then it is essential that the CMP EIR should include a feasibility analysis of the potential economic impacts on new development.⁶ How effective and credible will the CMP be if the fees are not imposed?

156

5. If a mitigation fee is proposed, then it is essential that financing, implementation responsibilities, and monitoring should be specifically addressed and identified in the Plan.

157

Thank you for this opportunity to comment. If you have any questions regarding these comments, please call me at (310) 865-6262.

Sincerely,



Alicia Ley
Assistant to City Manager/Planning Director

cc: Paul J. Philips, City Manager
Chuck Bernal, Assistant City Manager

Letter 12 Response to Comments from Jack Cook, Associate Planner, City of San Fernando, August 10, 1992.

158. Please refer to Response to Comment 3.
159. Please refer to Response to Comment 3, 26, 33, 64, 92, 94, 120 and 127.
160. There are no local jurisdiction development reporting requirements in the CMP. The Land Use Analysis Program only requires that for all EIR's prepared, the NOP be sent to LACTC.
161. This concern was considered in developing the CMP to meet statute requirements, so as to minimize additional burden. As indicated in Response to Comment 160 there are no local jurisdiction development reporting requirements in the CMP. The Land Use Analysis Program only requires that for all EIR's prepared, the NOP be sent to LACTC. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires. Additional time and expense to complete the evaluation is therefore not expected to be significant. Thus the Transportation Impact Analysis procedure does not result in a significant economic impact.
- The CMP Highway and Roadway System element does require that local jurisdictions annual monitor key CMP intersections so that LOS standards can be monitored. All affected local jurisdictions have already completed the monitoring effort for this year.
162. The Transportation Impact Analysis guidelines have been revised after consultation with the Highway Working Group. The five-mile radius requirement for impact analysis is no longer required. Please refer to the Final Draft CMP released in September 1992 for the revised guidelines.

CITY OF



SAN FERNANDO

117 Macnell Street
San Fernando, CA 91340-2993
(818) 898-1200

August 10, 1992

224052

Kendra Morris
Los Angeles County
Transportation Commission
818 West Seventh Street
Los Angeles, CA 90017

Re: Los Angeles County Congestion Management Program Draft
Environmental Impact Report SCH #91121063

Dear Ms. Morris:

Following are our comments on the draft EIR for the County's Congestion Management Program (CMP):

1. The question of mitigation fees means to be addressed in greater depth - how they will be applied and apportioned, the role of local governmental bodies, the amount of fees being considered. 158
2. Transportation automatically affects land use. More consideration should be given to the effect of the CMP on local land-use decisions. 159
3. Will local governmental bodies be required to report all development projects? Some threshold level seems necessary, if cities are not to report every building permit, which would be an undone burden and overwhelm the reporting system. 160
4. The entire burden of reporting and monitoring to LACTC may be too large a burden for cities, which are experiencing budget shortfalls and reduced staffing. 161
5. Requiring traffic impact studies within a five-mile radius is an undue burden, if not unworkable. What projects would have to provide such an analysis? Who decides? 162

Further comments will be provided by our City Engineer. We would appreciate being kept on your mailing list for further documentation.

Sincerely,

JACK COOK
Associate Planner

LTR-171.CD

Letter 13 Response to Comments from Lynn M. Harris, Deputy City Manager/Community Development, City of Santa Clarita, September 4, 1992.

- 163. See Response to Comment 3. The Commission has directed staff to develop deficiency plan strategies which do not include a Countywide fee for consideration for future year CMP's.
- 164. The Land Use Analysis Program applies only to projects for which an Environmental Impact Report will be prepared. The Countywide Congestion Study currently underway will evaluate congestion levels anticipated for the year 2010, and define countywide strategies for addressing the deficiencies caused. The congestion levels studied will be based on regional growth projections and will encompass the cumulative effects of all development on the regional system, not just those caused by significant projects.

Please refer also to Response to Comment 3.

- 165. The Capital Improvement Program identifies those new projects that were adopted into the 1992 STIP. The 1992 STIP also includes projects that were carried forward from the 1990 STIP. Those projects had State funding commitments prior to the CMP, and are supported in the Final Draft CMP by reference.
- 166. Please refer to Response to Comment 3.
- 167. The CMP EIR is tiered from the RMP EIR which contained a discussion of visual resource (aesthetic) impacts. This RMP EIR discussion applies also to the CMP EIR. As noted in the Initial Study for the CMP no increased risk of explosion or release of hazardous substances is anticipated as a result of the implementation of the CMP. Human health or risk of upset impacts associated with individual CMP CIP projects would be addressed as part of the project-level environmental review of those projects. Chapter IV of the CMP EIR explains why the CMP is not anticipated to result in significant changes in land use, i.e. in the distribution of population, employment and housing in the County, from current projections.

Please refer also to Response to Comment 26, 33, 64, 92, 94, 120 and 127.

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(805) 259-8125

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**City of
Santa Clarita**

September 4, 1992

**Ms. Kendra Morries, Project Manager,
Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, California 90017**

**Jill Klajc
Mayor**

**Jan Heldt
Mayor Pro-Tem**

**Carl Boyer
Councilmember**

**Jo Anne Darcy
Councilmember**

**George Paderson
Councilmember**

RE: CMP: Comments on the Draft Environmental Impact Report

Dear Ms. Morries:

Thank you for offering us the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Congestion Management Program. At this time, we have the following comments:

- 1) **One of the project alternatives should consider the use of a County wide mitigation fee, including the impact of not having a fee. Without the fee, how will the Congestion Management Program (CMP) insure impacts are mitigated in an equitable manner? The issue of credits for mitigation measures requires additional review in the DEIR, particularly if a fee alternative is analyzed.**
- 2) **As proposed, the CMP will apply only to projects that are regionally significant as defined by the California Environmental Quality Act or for which an environmental impact report is required. This exempts the majority of new development.**
- 3) **The list of projects on the CMP-Capital Improvement Projects (CIP) does not include any projects listed for the Santa Clarita Valley. Since this is a high growth area, and new development will be conditioned to mitigate impacts on the network, some CIP projects should be identified for this area. A number of projects for the Santa Clarita Valley are identified in the adopted 1992 State Transportation Improvement Program, which is included as an Appendix to the DEIR.**
- 4) **The approach regarding deficiency plans should be discussed at greater length within the DEIR.**
- 5) **The DEIR should contain sections on population, employment, housing; human health, utilities, aesthetics and risk of upset. The City also questions the conclusion expressed in the Notice of Preparation that the CMP will have no impact on these areas.**

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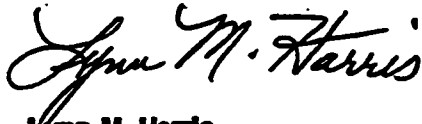
166

167

**Ms. Kendra Morris, Project Manager
LACTC, Congestion Management Program NOP
September 4, 1992**

**If you have any questions or comments on this letter, please contact Kevin Michel,
Senior Planner, at (805) 255-4351.**

Sincerely,



**Lynn M. Harris
Deputy City Manager
Community Development**

**LMH:KJM
current/cmpnod.ljm**

Letter 14 Response to Comments from David S. Ferren, Planning Director, City of Torrance, September 2, 1992.

168. Aside from gas tax subventions directly allocated to local jurisdictions, "CMP funds" include Flexible Congestion Relief and Traffic Systems Management funding programs. The CMP CIP list represents a final list of capital improvement projects funded under these programs during the current cycle.
169. The Final Draft CMP notes the following related policies from which the CMP was developed around:
- ▶ Local land use authority remains the responsibility of local jurisdictions.
 - ▶ The CMP gives local jurisdictions flexibility in meeting CMP responsibilities through existing local procedures rather than creating new CMP processes.
 - ▶ The CMP is being developed to be sensitive to the general economy of Los Angeles County. While increased mobility and reduced congestion serve attainment of this goal, CMP policies and procedures are being developed to minimize cost and provide certainty and predictability to the public and private sector alike.

LACTC has sought to develop the CMP to meet statute requirements while minimizing additional burden on local jurisdictions. The CMP project was developed over the last several years in consultation with local jurisdictions, regional and State agencies, and other interested parties. The CMP was developed as a countywide planning framework to work toward the implementation of long range regional mobility goals.

As indicated in Response to Comment 160 there are no local jurisdiction development reporting requirements in the CMP. The Land Use Analysis Program only requires that for all EIR's prepared, the NOP be sent to LACTC. CEQA already requires that EIR's evaluate a projects' impacts on the regional transportation system. The Transportation Impact Guidelines contained in the Land Use Analysis Program provide a consistent methodology for the regional impact evaluation that CEQA already requires. Additional time and expense to complete the evaluation is therefore not expected to be significant. Thus the Transportation Impact Analysis procedure does not result in a significant economic impact. LACTC staff will be working directly with local jurisdictions to assist in implementation issues. Local jurisdictions will be able to determine how best to implement the program within their own particular processes.

The Model TDM Ordinance was developed through extensive consultation with local jurisdictions and other interested parties. The Model TDM Ordinance identifies "TDM-friendly" facility standards for new non-residential development as a minimum standard for local compliance with CMP requirements. LACTC has sought to assist local jurisdictions to meet the April 1993 compliance deadline by developing a model ordinance and releasing this ordinance in advance of final CMP adoption.

The CMP Highway and Roadway System element does require that local jurisdictions annual monitor key CMP intersections so that LOS standards can be monitored. All affected local jurisdictions have already completed the monitoring effort for this year.

Local jurisdiction costs related to implementation of CMP responsibilities are eligible for Proposition 111 Local Subvention Funds. In addition, costs related to implementation of the Model TDM Ordinance are eligible for Proposition C Local Return funding.



CITY OF TORRANCE

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PLANNING
DEPARTMENT
DAVID S. FERREN
PLANNING DIRECTOR

September 2, 1992

Ms. Kendra Morris
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

SUBJECT: COMMENTS REGARDING THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) PREPARED FOR THE CONGESTION MANAGEMENT PROGRAM (CMP)

We would like to thank you for this opportunity to review and comment on the environmental impact report (EIR) prepared for the Congestion Management Program (CMP). City staff has the following two concerns:

- (1) LACTC has not finalized a list of capital improvement projects which would be funded from CMP funds within the County. We understand that this EIR was developed as a "program EIR" which focuses on the general environmental effects that can be expected to follow from the adoption of the CMP. Since the EIR does not address the environmental impacts associated with specific traffic improvements in and around the South Bay area, city staff cannot determine the direct impact of CMP implementation.
- (2) We will need to find out how much staff time and resources will be required to comply with CMP requirements. The EIR states that "Local governments' compliance with the CMP could result in the diversion of local government personnel and revenues for conducting traffic monitoring, implementing TDM responsibilities and implementing the Land Use Analysis responsibilities."

City staff will continue to attend the CMP Advisory Committee meetings to learn about the latest CMP developments. If you have any questions or comments, please contact Helene Buchman at (310) 618-5990.

Respectfully Submitted,

David S. Ferren
Planning Director

By Helene Buchman
Helene Buchman
Transportation Planner

Concur:

David S. Ferren
David S. Ferren
Planning Director

**Letter 15 Response to Comments from Cynthia K. Simons, Latham & Watkins,
September 9, 1992.**

- 170. Comment noted.
- 171. Comment noted.
- 172. Please refer to Response to Comments 3, 26, 33, 62, 64, 92, 94, 120 and 127.
- 173. Comment noted.
- 174. Please refer to Response to Comments 3 and 64.
- 175. As a "Responsible Agency", as defined by the California Environmental Quality Act, local jurisdictions will be responsible for notifying LACTC of proposed development projects/programs preparing Environmental Impact Reports through the NOP process. The CMP Land Use Analysis Program and Transit Review Guidelines apply only to projects for which an Environmental Impact Report will be prepared.
- 176. The CMP transportation impact analysis (TIA) guidelines have been developed in direct consultation with local jurisdictions, in order to maximize consistency in the analyses conducted by different agencies while maintaining flexibility for integration with local procedures. This consultation has been achieved through meetings of the CMP Highway Working Group, Technical Forum and Policy Advisory Committee, as well as meetings and correspondence with individual agencies and other organizations. Comments regarding the value of these guidelines for providing realistic assessment of project-related impacts have been very positive.

Regarding the potential for TIA requirements to discourage development in the central areas of the county, the CMP EIR discusses the potential impact of the CMP on land use and identifies necessary mitigation measures.

Please refer also to Response to Comments 26 and 33.

177. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires. The selection of appropriate mitigation strategies is left to the discretion of the local jurisdiction. However, the CMP provides local jurisdictions the opportunity to develop transportation strategies that minimize decentralization and provide adequate transportation access necessary to support urban development.
178. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires. The selection of appropriate mitigation strategies is left to the discretion of the local jurisdiction. However, the CMP provides local jurisdictions the opportunity to develop transportation strategies that minimize decentralization and provide adequate transportation access necessary to support urban development.

The Countywide Congestion Study currently underway will evaluate congestion levels anticipated for the year 2010, and define countywide strategies for addressing the deficiencies caused. The congestion levels studied will be based on regional growth projections and will encompass the cumulative effects of all development on the regional system, not just those caused by significant projects.

Assembly Bill 3093 authorizes LACTC to facilitate a statewide CMP Steering Committee to examine unresolved issues and modifications related to CMP statute. The Committee will be comprised of representatives from state, regional and local agencies, as well as members of the private sector and environmental interests. Statute requires discussion of various topics including: improving coordination of the CMP with state and federal clean air acts, examining mobility measures for air quality conformance purposes and other issues which are raised by Congestion Management Agencies statewide.

Assembly Bill 3093 also directs regional transportation agencies (e.g. SCAG) covering more than one county to resolve inconsistencies and mediate interagency disputes related to CMP's for their area.

179. Please refer to Response to Comment 3.
180. Please refer to Response to Comment 3.

181. The Final Draft CMP contains the criteria for the determination of a significant project impact under the land use analysis program. For purposes of the CMP, a significant impact occurs when the proposed project causes a CMP facility to degrade to LOS F, or increases traffic demand within LOS F by 2% capacity or more. This criteria is based on incremental effect and resulting congestion levels. This criteria has been selected in order to minimize administrative costs and maximize effectiveness of the program at addressing the cumulative impacts of development while still providing a methodology for measuring and determining impact.

The selection of appropriate mitigation measures is left to the lead agency.

182. Please refer to Response to Comments 178.
183. Please refer to Response to Comments 3, 26, 33, 62, 64, 92, 94, 120 and 127.
184. Information derived from the Land Use Analysis Program will provide local jurisdictions with greater information on land use patterns and land uses that reduce trip generation. The CMP does not "override" local land use planning strategies. Under the Land Use Analysis Program, the selection of appropriate mitigation strategies is left to the discretion of the local jurisdiction. Likewise, land use decisions remain under the control of local jurisdictions.

This approach was developed with the following CMP policies in mind (Final Draft CMP, September 1992):

- ▶ Local land use authority remains the responsibility of local jurisdictions.
 - ▶ The CMP gives local jurisdictions flexibility in meeting CMP responsibilities through existing local procedures rather than creating new CMP processes.
 - ▶ The CMP is being developed to be sensitive to the general economy of Los Angeles County. While increased mobility and reduced congestion serve attainment of this goal, CMP policies and procedures are being developed to minimize cost and provide certainty and predictability to the public and private sector alike.
185. Please refer to Response to Comments 3, 26, 33, 62, 64, 92, 94, 120 and 127.
186. Please refer to Response to Comments 33 and 184. Local land use permitting will remain under the control of local jurisdictions under the CMP.

LATHAM & WATKINS

ATTORNEYS AT LAW

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ELN 62793268

CABLE ADDRESS LATHWAT

September 9, 1992

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ORANGE COUNTY OFFICE

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FAX (202) 637-8801**

**PAUL R. WATKINS 889-19731
DANA LATHAM 889-19741**

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**Ms. Kendra Morris
Land Use Project Manager
Los Angeles County Transportation Commission
818 West Seventh Street (M/S 2200)
Los Angeles, California 90017**

**Re: Comments on Los Angeles County Congestion Management Program
Environmental Impact Report dated July 1992 (SCH # 91121063)**

Dear Ms. Morris:

We are submitting the following comments on the Los Angeles County Congestion Management Program Environmental Impact Report dated July 1992 (the "Draft EIR") on behalf of our firm. As you know, we represent a number of clients with activities in the County. We appreciate the efforts of the Los Angeles County Transportation Commission ("LACTC") to develop a program that seeks to relieve congestion on a County-wide basis without unduly disrupting the course of development in the County. We appreciate the fact that a number of our previous comments have been considered by LACTC Staff and look forward to continuing our work with LACTC when the revised draft of the Congestion Management Plan ("CMP") is issued in September.

We believe that the impacts associated with implementation of the CMP are necessarily linked to the scope and substance of the CMP that is proposed for consideration by LACTC. Therefore, it is difficult to assess the adequacy of the environmental assessment contained in the Draft EIR because a revised draft CMP has not been released to the public at this time. Therefore, many of the following comments may address questions and concerns regarding the substance of the upcoming CMP draft that appears to be indicated by the project description and other statements contained in the Draft EIR.

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A. Project Description

As discussed above, the revised draft CMP has not been released for public review. Therefore, the specific scope and content of the proposed CMP that is being assessed in the Draft EIR is still unclear. Nevertheless, specific provisions of the CMP may influence the extent of impact that will result from its implementation. For instance, the Draft EIR concludes that the likelihood of significant decentralization of development resulting from implementation of the CMP will be negligible. Therefore, the Draft EIR concludes that impacts to vehicle miles travelled, local planning strategies and air quality will be less than significant.

However, the scope and complexity of the land use analysis and required mitigation measures could be sufficiently burdensome to prohibit or discourage development in central areas in which roadways may be significantly congested already. This could reduce development in these areas, resulting in significant socioeconomic and other impacts, and encourage development in outlying county areas, thus increasing impacts in all categories. Therefore, we believe that findings that the CMP will have less than significant impacts may not be supportable, because there is a reasonable likelihood that such impacts will occur.

B. Projects Covered

It appears from the Draft EIR that the draft of the CMP will expressly provide an exemption from the land use analysis requirement for all projects for which a Notice of Preparation ("NOP") was issued prior to local adoption of a land use analysis program. We would like to express our strong support for such a provision, which recognizes the need for certainty in the land use process. To avoid creating significant impacts on projects in process today, it is essential for this provision to be included when the CMP is adopted. If it is changed, additional environmental review would be needed.

As we have stated previously, additional delays, uncertainty and cost would result if development projects that are already well along in the planning and environmental review process could become subject to additional, possibly conflicting, CMP requirements at a later date. As stated in the Draft EIR, "CMP policies and procedures are being developed to minimize cost and provide certainty and predictability. . ." (Draft EIR, page 16). Therefore, we believe that the most reasonable and fair approach is to exempt such projects from the CMP process.

C. Land Use Analysis/Mitigation

As discussed throughout this submittal, we are concerned that the land use analysis and mitigation requirements to be imposed by the CMP have not been adequately defined to allow full evaluation of the environmental impacts of the project. The Draft EIR indicates that the land use component of the revised CMP will require local jurisdictions to analyze the regional transportation impacts of development projects in the project EIR. However, the CMP will leave all decisions regarding mitigation and possible fees to the local

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jurisdictions and will provide no guidance regarding deficiency plans at this time. We are concerned that this will create inconsistency and uncertainty.

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1. Scope

The Draft EIR states that local jurisdictions will be required to inform LACTC of proposed development projects through the NOP process, at which time LACTC may act as a responsible agency. We believe that the CMP should clarify that such involvement should be limited strictly to those projects that may have a significant impact on regional congestion and traffic volumes on the CMP network.

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2. Methodology

The Draft EIR states that "the CMP will ensure consistency, compatibility, and integration of other transportation studies within the County" (Draft EIR, page 16) and that "CMP implementation guidelines will be developed that provide local agencies with flexibility in meeting CMP responsibilities through existing local procedures, rather than creating new CMP procedures." (Draft EIR, page 16). We strongly agree that such concepts must be included in the CMP process to ensure that project sponsors are not required to conduct several different analyses in order to comply with both local and CMP requirements. However, we cannot at this time determine whether the methodology for conducting traffic analyses under the CMP will, in fact, be consistent with local requirements. In addition, it is unclear whether such methodology will provide a realistic assessment of project-related impacts on the regional network. Depending upon the specific requirements for traffic analyses set forth in the CMP, implementation of the plan could discourage further development within central areas of the County.

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3. Mitigation at Local Level

Although the revised CMP will not include a deficiency plan component, it will require project EIRs to assess the impacts of development on the CMP network and identify mitigation measures and estimate the costs of mitigating impacts to the CMP network. However, "it will remain the discretion of the local jurisdiction to select the mitigation measures it deem[s] appropriate" and "the determination of whether or not to assess any mitigation cost would remain the discretion of the local jurisdiction." We are extremely concerned that this will create significant uncertainty and inconsistency among the many local jurisdictions covered by the CMP.

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We believe that the CMP must address cross-jurisdictional impacts and provide a mechanism for distributing required mitigations among various jurisdictions that may be impacted by land use decisions. Leaving mitigation of regional traffic impacts entirely up to each local jurisdiction to address in its own discretion runs counter to the purpose of CMP legislation to create a regional planning mechanism.

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In addition, the CMP should clarify, on a County-wide basis, that projects must receive credit for project characteristics, such as design features, location and aggressive transportation demand management programs, which reduce vehicle trips and vehicle miles travelled, and project improvements producing network benefits, both of which will reduce congestion levels on a regional basis. The CMP should provide adequate incentives to encourage the development of mixed-use projects, ridesharing, and the selection of project sites that contribute to jobs/housing balance or take advantage of existing transit corridors.

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4. Deficiency Plans

The CMP legislation requires local jurisdictions to adopt deficiency plans to address any segment of the CMP network falling below established LOS standards. How is this responsibility to be met during the interim period prior to LACTC adoption of a County-wide deficiency plan that will provide guidance for local jurisdictions? We are concerned that the lack of a regional deficiency plan may present local jurisdictions with several difficult scenarios. Certain jurisdictions may adopt deficiency plans that are inconsistent, and because they are purely local in scope, do not address regional roadway impacts. Other jurisdictions may fail to adopt deficiency plans altogether. We are extremely concerned that the failure to adopt such plans and the adoption of potentially inadequate plans may inhibit all development in the County that may result in regional transportation impacts until such time as an adequate deficiency plan can be developed. This scenario would have potentially devastating impacts on the County's economy.

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D. Vehicle Miles Travelled/Vehicle Trips

We strongly oppose the suggestion that the CMP establish that any increase in net vehicle trips or VMT would constitute a significant impact to regional transportation. We further disagree with the suggestion that projects must achieve full mitigation of net increases in vehicle traffic.

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While CEQA requires adoption of all feasible mitigation measures to reduce project-related impacts to levels of insignificance, it does not require full mitigation of all impacts. In addition, the Growth Management and Regional Mobility Plans for the region anticipate and provide for projected growth in vehicle trips and vehicle miles travelled within the County. Moreover, the significance of increases in vehicle trips and VMT is dependent upon existing conditions and cumulative impacts. Therefore, there is no rational basis for stating across the board that "any" increase in VT or VMT constitutes a significant impact. Because the purpose of the CMP is to address congestion levels within the County, any threshold of significance established by the CMP must be based on congestion levels, not any increase in traffic levels, regardless of surrounding conditions.

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E. Inter-Jurisdictional Impacts

The Draft EIR states that "LACTC shall continue to participate in on-going forums with Southern California Congestion Management Agencies and SCAG, regarding inter-jurisdictional impacts including land use issues and impact analysis procedures." (Draft EIR, page 59). However, as discussed above, there appears to be inadequate guidance as to how to analyze and mitigate inter-jurisdictional impacts, both among local jurisdictions within Los Angeles County and across county borders. We are concerned that this will create considerable inconsistency and uncertainty.

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F. Air Quality Impacts

The Draft EIR concludes that the "CMP will contribute to a decrease in on-road emissions by maintaining established levels of roadway and transit service so as to minimize delays and congestion. . ." However, the Draft EIR recognizes that the CMP could have a significant impact on air quality if it encourages decentralization of development, but concludes that such decentralization is unlikely. As discussed above, the Draft EIR underestimates the chances for such decentralization and the resulting air quality impacts.

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G. Transportation Impacts

Please clarify how the land use analysis component of the CMP will "encourage development patterns which reduce trips, which would in turn, result in beneficial impacts on the regional highway and transit systems." (Draft EIR, page 58) As discussed further below, we are concerned that language to this effect suggests that the CMP may be used to override local land use planning strategies.

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H. Growth Redistribution

As discussed above, the Draft EIR concludes that the likelihood of significant decentralization of development resulting from implementation of the CMP will be negligible. However, depending upon the scope and complexity of the land use analysis and required mitigation measures, we believe that implementation of the CMP could provide significant disincentives to development within urbanized portions of the County, resulting in significant socioeconomic impacts. Development has slowed already in the current economic environment. A burdensome land use analysis that imposes additional costs and delay on project sponsors or may require significant new mitigations may further inhibit much needed economic growth in Los Angeles County.

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In addition, the CMP could provide developers with significant incentives to locate development away from existing urbanized centers and to further increase development in undeveloped portions of the County where LOS levels remain within established standards. While this may serve to disperse traffic in the short term, it may increase vehicle miles travelled

LATHAM & WATKINS

Ms. Kendra Morris

September 9, 1992

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and vehicle trips by significant amounts, ultimately expanding the scope of the County's congestion problems and increasing air quality impacts.

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Clearly, LACTC recognizes that the CMP may have significant impacts on land use patterns and planning decisions of local jurisdictions. The Draft EIR states that "the implementation of the CMP may have effects on the rate and distribution of growth (population, employment, residential and non-residential). . ." (Draft EIR, page 81). We are concerned that language throughout the Draft EIR suggests that the CMP may overrule local land use planning efforts, thus subverting essential local authority over land use decisions. In addition, if the CMP may be responsible for development patterns that are inconsistent with current local planning documents and assumptions contained in regional growth management plans, implementation of the CMP may have far more extensive impacts in every category than have been set forth in the Draft EIR.

We look forward to working with LACTC Staff to address these issues and to further refine the CMP prior to its adoption later this year.

Very truly yours,



Cynthia K. Simons
of LATHAM & WATKINS

cc: Donald P. Baker, Esq.
Linda K. Sherwood, Esq.
Lucinda Starrett, Esq.

**Letter 16 Response to Comments from Donald F. McIntyre, President and CEO,
Central City Association of Los Angeles, September 4, 1992.**

- 187. Comments noted.
- 188. Please refer to Response to Comment 3.
- 189. Please refer to Response to Comment 3.
- 190. Please refer to Response to Comments 3.
- 191. Please refer to Response to Comments 3.
- 192. Please refer to Response to Comments 3.
- 193. The Final Draft CMP released in September 1992, has revised the criteria for the determination of a significant project impact under the land use analysis program. For purposes of the CMP, a significant impact occurs when the proposed project causes a CMP facility to degrade to LOS F, or increases traffic demand within LOS F by 2% capacity or more. This criteria is based on incremental effect and resulting congestion levels. This criteria has been selected in order to minimize administrative costs and maximize effectiveness of the program at addressing the cumulative impacts of development while still providing a methodology for measuring and determining impact.

The selection of appropriate mitigation measures is left to the discretion of the local jurisdiction.
- 194. Please refer to Response to Comment 178.
- 195. Please refer to Response to Comments 3, 26, 33, 62, 64, 92, 94, 120 and 127.
- 196. Please refer to Response to Comment 33.
- 197. The LOS monitoring data provided in the CMP reflects actual traffic counts, and therefore includes trips generated from all sources.

198. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires.

Regarding modeling consistency, LACTC staff will continue to work with local agencies to define mutually beneficial measures of consistency and promotion of model improvements.

199. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires.

As indicated in the Final Draft CMP (September 1992), the TIA guidelines require estimation only of the projects' fair share costs of mitigation. The selection of appropriate mitigation measures is left to the discretion of the local jurisdiction.

The Countywide Congestion Study currently underway will evaluate congestion levels anticipated for the year 2010, and define countywide strategies for addressing the deficiencies caused. The congestion levels studied will be based on regional growth projections and will encompass the cumulative effects of all development on the regional system, not just those caused by significant projects.

200. The Transportation Impact Analysis Guidelines were developed in consultation with local jurisdictions to reflect a realistic approach to such analysis. The CMP TIA is also structured to accommodate improvements in methodology or unusual project characteristics, by allowing for variation from this standard through appropriate documentation (see Final Draft CMP, September 1992).
201. Please refer to Response to Comment 193.
202. Comment noted.
203. This is accurate, projects for which a Notice of Preparation was issued prior to local adoption of the Land Use Analysis Program and TDM Ordinance will be exempt from the CMP.

204. Local jurisdictions are required to adopt and implement the Land Use Analysis Program and TDM Ordinance by April 1, 1992. Local jurisdictions are not required to implement the CMP prior to these dates.
205. Please refer to Response to Comment 62.
206. The CMP Land Use Analysis Program and Transit Review Guidelines apply only to projects for which an Environmental Impact Report will be prepared.
207. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires.

LACTC staff will be working directly with local jurisdictions to assist in implementation issues. Local jurisdictions will be able to determine how best to implement the program within their own particular processes.

208. Please refer to Response to Comment 178.
209. Please refer to Response to Comment 86. TDM strategies, beyond those contained in the model TDM Ordinance, will be considered for credits through the Countywide Congestion Study currently underway.

Please refer also to response to Comment 3.

210. Please refer to Response to Comment 193.
211. Please refer to Response to Comment 26 and 33.



CENTRAL CITY ASSOCIATION
OF LOS ANGELES

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September 4, 1992

Mr. Brad McAlester
Project Manager For Congestion Management
Los Angeles County Transportation Commission
818 West Seventh St.
Suite 1100
Los Angeles, CA 90017


Dear Brad:

Central City Association appreciates the opportunity to provide comments on the CMP draft EIR.

CCA requested an analysis of the draft EIR from Cindy Starrett of Latham & Watkins. Ms. Starrett prepared the analysis that is attached to this letter. After a thorough discussion with our Transportation and Executive Committees, CCA has endorsed this analysis and hopes that LACTC will consider it before completing the EIR.

We look forward to working with you on further development of the CMP process.

Sincerely,


Donald F. McIntyre
President & CEO

Encls.

DFM/el

CMP ISSUES SUMMARY FOR CCA DISCUSSION

Dates: LA COUNTY DRAFT CMP

- August 1991 – first draft CMP released
- September 1992 – revised final draft CMP anticipated
- December 1, 1992 – CMP adoption deadline for LACTC
- Local governments must adopt "land use analysis program" of CMP within 120 days thereafter; approximately April 1, 1993

CMP DRAFT EIR

- September 9, 1992 – public comments due

A. CMP ISSUES

1. Mitigation Fee and Fee Credits

- Fees are not proposed in the current CMP, but may be raised in future annual reviews of the CMP. The Draft EIR suggests that, for the time-being, any impact fees will be imposed by local jurisdictions. We welcome the deletion of the County-wide fee, but are concerned that inviting local jurisdictions to assess regional fees may create inconsistency and uncertainty. 188
- Previous fee provisions would have imposed a development fee based on land use type and square footage. A "congestion gap" analysis is now planned. We believe it would not necessarily bear any relationship to regional transportation impacts. No fees for the mitigation of regional impacts should be assessed until a nexus study is conducted, including the impact of new fees on development. At a minimum, any fee proposal should ensure that fees bear a direct relation to impacts and that inconsistent and overlapping fees are not assessed. 189

- If a CMP mitigation fee is imposed, projects must receive credit for all mitigation measures that may enhance regional transportation service. Credits should be provided for improvements funded by the developer, fees paid at the local level or required pursuant to a specific plan, and land use concepts or design features that result in reduced trips or vehicle miles travelled, including TDM, mixed-use development, development within close proximity to transit corridors and development at sites that contribute to jobs/housing balance.

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2. Deficiency Plans

- The revised draft CMP to be issued in September will not contain a deficiency plan component. However, the CMP legislation requires local jurisdictions to adopt deficiency plans to address any segment of the CMP network falling below established LOS standards. Presumably local governments will take their own steps – probably inconsistent – until LACTC adopts a County-wide deficiency plan that will provide guidance for local jurisdictions.
- The Draft CMP suggests that Deficiency Plans must exceed those measures contained in the 1991 AQMP. The CMP legislation does not require this. In addition, the AQMP does not assume implementation of CMP measures that go beyond AQMP measures in projecting attainment of air quality standards. The two plans can work in concert with one another, with the CMP implementing measures contained in the AQMP.

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3. Land Use Analysis

- We believe that the CMP should establish a threshold "level of significance" for regional impacts, rather than classify any increase in vehicle trips or vehicle miles travelled as a significant impact. In addition, we do not believe that the CMP requires full mitigation of net project-related increases in vehicle traffic. CEQA does require adoption of all feasible mitigation measures to reduce project-related impacts to levels of insignificance. But it does not require full mitigation of all impacts. In addition, the Growth Management and Regional Mobility Plans for the region anticipate and provide for projected growth in vehicle trips and vehicle miles travelled within the County. Moreover, the significance of increases in vehicle trips and VMT is dependent upon existing conditions and cumulative impacts. Therefore, there is no rational basis for stating across the board that "any" increase in VT or VMT constitutes a significant impact. Because the purpose of the CMP is to address congestion levels within the County, any threshold of significance established by the CMP must be based on congestion levels, not any increase in traffic levels, regardless of surrounding conditions.

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- More guidance is needed on how to analyze and mitigate inter-jurisdictional impacts, both among local jurisdictions within Los Angeles County and across county borders.

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4. Growth Redistribution

- The Draft EIR concludes that the likelihood of significant decentralization of development resulting from implementation of the CMP will be negligible. However, depending upon the scope and complexity of the land use analysis and required mitigation measures, implementation of the CMP could provide significant disincentives to development within urbanized portions of the County, resulting in significant socioeconomic impacts, and incentives to increase development in undeveloped portions of the County where LOS remains within established standards. While this may serve to disperse traffic in the short term, it may increase vehicle miles travelled and vehicle trips by significant amounts, ultimately expanding the scope of the County's congestion problems and increasing air quality impacts.
- Implementation of the CMP may result in development patterns that are inconsistent with current local planning documents and assumptions contained in regional growth management planning.

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5. Baseline Criteria

- CMP baseline LOS levels should include all trips generated by projects which are exempted from the CMP, to ensure that baseline calculations fully reflect existing conditions.

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6. Methodology

- Project analysis conducted pursuant to CMP provisions should not require project sponsors to prepare additional traffic studies. LACTC's regional transportation model and database should allow projects to submit data developed for use by local jurisdictions to satisfy all CMP requirements. The Draft EIR suggests that this is an LACTC goal and that local models can be approved to satisfy CMP requirements. However, it is unclear how inconsistencies may be resolved.
- While traffic analyses required under the CMP should be consistent with the assessment procedures under CEQA, CEQA traffic studies analyze the cumulative impacts associated with all related projects. Any mitigation or fees required under the CMP should address project-related impacts only and should not address cumulative impacts resulting from related projects.

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- The methodology for assessing project-related traffic impacts on the CMP network must provide a realistic and reasonable assessment of such impacts. Many of the models currently in use at this time dramatically overstate traffic impacts.
- The CMP must provide clear guidance as to the precise manner for assessing deterioration in LOS, particularly, a means for assessing deficiencies on roadways that are already at LOS F.

7. Effective Date of CMP Provisions

- The Draft EIR indicates that projects for which an NOP was issued prior to adoption by the local jurisdiction of the land use analysis program will be exempt from the requirements of such a program. We strongly support this new exemption.
- This indicates that projects that are further along in the approval process (beyond NOP) or have received approvals or permits at the time of CMP adoption would also be exempted.
- Local jurisdictions should not apply CMP requirements until the CMP is adopted.

B. CMP EIR ISSUES

1. Lack of Draft CMP for review
2. Projects impacted should be limited to those with significant impact on regional network
3. Methodology should be consistent with local government CEQA requirements
4. Conflicts of local vs. regional mitigation must be addressed, both within county and between counties
5. Project design and location should be credited, if close to transit and designed as TDM-friendly
6. Establish threshold of significance for impacts
7. Air quality impacts must consider "decentralization" effect and possible redistribution of growth

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**Letter 17 Response to Comments from Department of Transportation and Engineering,
City of West Hollywood, September 9, 1992**

212. Comments noted. Specific comments are addressed in Response to Comments 213-227.

213. Please refer to Response to Comment 26 and 33.

214. The CMP CIP element is consistent with the RMP. The CMP EIR therefore incorporated, by reference, the related evaluations done in the RMP EIR. Although CIP projects are identified in the CMP, they are at an insufficiently advanced stage of planning to permit analysis of their effects on urban concentration and deconcentration. Individual CIP facilities will be subject to project-level environmental review when they reach a stage of design which will permit the effective analysis of their environmental effects.

 Please refer also to Response to Comment 33.

215. Please refer to Response to Comments 3, 26, 33 and 64.

216. Please refer to Response to Comment 3.

217. The selection of appropriate mitigation measures is left to the discretion of the local jurisdiction.

 Please refer also to Response to Comment 3 and 64.

218. The Final Draft CMP notes the following related policies from which the CMP was developed around:

- ▶ Local land use authority remains the responsibility of local jurisdictions.
- ▶ The CMP gives local jurisdictions flexibility in meeting CMP responsibilities through existing local procedures rather than creating new CMP processes.
- ▶ The CMP is being developed to be sensitive to the general economy of Los Angeles County. While increased mobility and reduced congestion serve attainment of this goal, CMP policies and procedures are being developed to minimize cost and provide certainty and predictability to the public and private sector alike.

LACTC has sought to develop CMP requirements to meet statute requirements while minimizing additional burden on local jurisdictions. The CMP project was developed over the last several years in consultation with local jurisdictions, regional and State agencies, and other interested parties. The CMP was developed as a countywide planning framework to work toward the implementation of long range regional mobility goals.

There are no local jurisdiction development reporting requirements in the CMP. The Land Use Analysis Program only requires that for all EIR's prepared, the NOP be sent to LACTC. CEQA already requires that EIR's evaluate a projects' impacts on the regional transportation system. The Transportation Impact Guidelines contained in the Land Use Analysis Program provide a consistent methodology for the regional impact evaluation that CEQA already requires. Additional time and expense to complete the evaluation is therefore not expected to be significant. Thus the Transportation Impact Analysis procedure does not result in a significant economic impact. LACTC staff will be working directly with local jurisdictions to assist in implementation issues. Local jurisdictions will be able to determine how best to implement the program within their own particular processes.

The Model TDM Ordinance was developed through extensive consultation with local jurisdictions and other interested parties. The Model TDM Ordinance identifies "TDM-friendly" facility standards for new non-residential development as a minimum standard for local compliance with CMP requirements. LACTC has sought to assist local jurisdictions to meet the April 1993 compliance deadline by developing a model ordinance and releasing this ordinance in advance of final CMP adoption.

The CMP Highway and Roadway System element does require that local jurisdictions annual monitor key CMP intersections so that LOS standards can be monitored. All affected local jurisdictions have already completed the monitoring effort for this year.

Local jurisdiction costs related to implementation of CMP responsibilities are eligible for Proposition 111 Local Subvention Funds. In addition, costs related to implementation of the Model TDM Ordinance are eligible for Proposition C Local Return funding.

219. In the August 1991 draft CMP, a countywide mitigation fee was discussed as a mechanism to meet the land use analysis requirement and address the deficiency plan process. LACTC took action in early 1992 not to further pursue a countywide mitigation fee approach, but to instead conduct a Countywide Congestion Study to develop an alternative approach for deficiency plan requirements. Pursuant to Commission direction a mitigation fee approach will not be considered.

The mitigation fee represented one alternative approach to meeting CMP deficiency plan requirements. Study of that alternative showed the complex issues which must be considered in development of deficiency plans, and the time which must be spent on both technical evaluation as well as building consensus toward workable solutions. This experience has been echoed throughout the state, as nearly all other counties are still in the process of developing deficiency plan guidelines.

It should also be reiterated that the deficiency plan is not an element that is required to be included in the CMP. "Deficiencies," by definition, do not occur and need not be addressed until portions of the system are shown to degrade below the level of service standard. Since the CMP is currently documenting levels of service for the first time, degradation of the system has not been shown. Local jurisdictions will not be responsible for the deficiency plan component until the Countywide Study has been completed and LACTC adopts deficiency plan guidelines.

The Countywide Congestion Study currently underway will evaluate congestion levels anticipated for the year 2010, and define countywide strategies for addressing the deficiencies caused. The congestion levels studied will be based on regional growth projections and will encompass the cumulative effects of all development on the regional system, not just those caused by significant projects. The Study will investigate a method for crediting public or private improvements to the CMP system. The Study will also examine land use scenarios that maximize trip generation and will evaluate a program to create and encourage incentives for local land use decisions that reduce trips and that are supportive of development in proximity to transit centers and along major transit corridors. The results of the Countywide Congestion Study will be presented to the Commission for adoption in the 1993 CMP, which will be subject to further environmental analysis.

Under the Land Use Analysis Program, the selection of appropriate mitigation measures for specific projects will remain the discretion of the local jurisdiction.

220. The CMP CIP element is consistent with the RMP. The CMP EIR therefore incorporated, by reference, the related evaluations done in the RMP EIR. Although CIP projects are identified in the CMP, they are at an insufficiently advanced stage of planning to permit analysis of their effects on urban concentration and deconcentration. Individual CIP facilities will be subject to project-level environmental review when they reach a stage of design which will permit the effective analysis of their environmental effects.

The CMP Capital Improvement Program also includes projects, such as HOV lanes and transitways, that are supportive of mode shift strategies as well. These efforts all work toward the attainment of regional air quality and mobility goals.

221. Local jurisdictions are currently responsible for examining regional impacts through the CEQA process. The Transportation Impact Guidelines contained in the Land Use Analysis Program will enhance this review and provide a consistent methodology for the regional impact evaluation that CEQA already requires. The selection of appropriate mitigation strategies is left to the discretion of the local jurisdiction. However, the CMP provides local jurisdictions the opportunity to develop transportation strategies that minimize decentralization and provide adequate transportation access necessary to support urban development.

The Countywide Congestion Study currently underway will evaluate congestion levels anticipated for the year 2010, and define countywide strategies for addressing the deficiencies caused. The congestion levels studied will be based on regional growth projections and will encompass the cumulative effects of all development on the regional system, not just those caused by significant projects.

Assembly Bill 3093 authorizes LACTC to facilitate a statewide CMP Steering Committee to examine unresolved issues and modifications related to CMP statute. The Committee will be comprised of representatives from state, regional and local agencies, as well as members of the private sector and environmental interests. Statute requires discussion of various topics including: improving coordination of the CMP with state and federal clean air acts, examining mobility measures for air quality conformance purposes and other issues which are raised by Congestion Management Agencies statewide.

Assembly Bill 3093 also directs regional transportation agencies (e.g. SCAG) covering more than one county to resolve inconsistencies and mediate interagency disputes related to CMP's for their area.

Please refer also to Response to Comment 62 and 169.

222. The CMP must, by law, be consistent with the RMP and thus the AQMP. It is expected that SCAG will find the CMP consistent with the RMP.
223. Alternative 2 in the CMP EIR presumes that no Congestion Management Program is adopted, and that State Flexible Congestion Relief and Traffic System Management funds are lost as a result. State CMP statute requires that projects competing for State Flexible Congestion Relief and Traffic System Management funding be included in the CMP Capital Improvement Program in order to be eligible for those funding sources. Therefore, Alternative 2 in the CMP EIR accurately portrays that if the CMP is not adopted, no projects in the Los Angeles region will be eligible for State FCR or TSM funding. CMP statute even requires the removal of approved projects from the 1992 STIP if such projects are not included in a CMP adopted by December 1, 1992. In addition, AB 1435 was signed into law in late September 1992, and prohibits the regional agency (SCAG) from programming federal transportation funds in a county that does not have an adopted CMP by December 1992. Therefore, funding from the new federal transportation act (ISTEA) is also linked to the CMP through State implementing legislation.
224. The CMP EIR describes the alternatives at a program level of specificity. As noted in Chapter V of the CMP EIR, the alternatives are tiered from the alternatives contained in the RMP EIR. A summary of the quantitative analysis of the RMP alternatives is included in Table 26 of the CMP EIR (see pages 153-163). As did the RMP EIR, the CMP EIR includes a TDM Intensive Alternative and a Capital Intensive Alternative. These CMP alternatives fit within the general framework of the adopted RMP strategy. The more capital intensive and TDM-alternatives of the RMP are used to provide a sense of how the CMP Capital Intensive and TDM Intensive alternatives compare to the more balanced strategy of the CMP, since like the CMP, the adopted RMP is the more balanced of the strategies analyzed in the RMP EIR.

The CMP Capital Improvement Program also includes projects, such as HOV lanes and transitways, that are supportive of mode shift strategies as well. These efforts all work toward the attainment of regional air quality and mobility goals.

225. The CMP Model TDM Ordinance, (Appendix C of the CMP EIR), focuses on incorporating "TDM-friendly" facilities into the design of new non-residential development and, as such, complements the employer-based performance approach of SCAQMD's Regulation XV. The Model TDM Ordinance also supports ongoing planning and implementation of centers, bicycle lanes, and multi-modal transfer centers, among other strategies, at both the regional and local level. Thus, successful implementation of TDM strategies contained in the CMP Model TDM Ordinance assists in achieving regional mobility and air quality goals.

Although work has been done to begin to quantify the benefits of various TDM strategies, this quantification effort is in its early stages. See for example: "Preliminary Draft: Implementation of the Transportation Demand Actions", released by the AQMD in July 1992, which is the AQMD's initial attempt to quantify the benefits of TDM strategies or, "Transportation Control Measure Information Documents" published by the EPA in March 1992, which the EPA considers to be a first step in quantifying TDM benefits.

226. The Countywide Congestion Study currently underway will evaluate congestion levels anticipated for the year 2010, and define countywide strategies for addressing deficiencies caused. The congestion levels studied will be based on regional growth projections and will encompass the effects of all development on the regional system, not just those caused by significant projects.

Please refer also to response to Comment 3.

227. The CMP is the countywide process that will work toward regional mobility and air quality goals. The CMP provides an opportunity for the monitoring of progress toward regional mobility goals, and coordination with other regional plans. The CMP project was developed over the last several years in consultation with local jurisdictions, regional and State agencies, and other interested parties. The CMP was developed as a countywide planning framework to work toward the implementation of long range regional mobility goals. The CMP will work toward implementation of the RMP, and will provide valuable information for ongoing and planned updates of regional plans such as the Regional Mobility Plan and Air Quality Management Plan. LACTC is actively participating with SCAG in the development of the RMP, and as the RMP is updated, the CMP will also be examined to reflect regional changes.

MEMORANDUM

TO: KENDRA MORRIES, LACTC

FROM: DEPARTMENT OF TRANSPORTATION & ENGINEERING
CITY OF WEST HOLLYWOOD

DATE: SEPTEMBER 9, 1992

RE: COMMENTS ON CMP EIR

The City of West Hollywood is concerned about potential negative environmental impacts as the result of implementation of the Congestion Management Program and is concerned that the Environmental Impact Report which was prepared by the Los Angeles County Transportation Commission does not adequately address these potential negative impacts. The City has consistently expressed these concerns to the LACTC throughout the development of the CMP.

The City is most concerned now, two years following the approval of the legislation about the very same issues that it raised to the Commission back in 1990. Primarily there issues are: 1. That the CMP will encourage urban sprawl, with all of its negative consequences outlined in the EIR., 2. That the CMP will have substantial financial impacts on local governments and local developers, 3. That the CMP will encourage people to use autos more than alternative transportation modes, and 4. That the CMP will, through fuzzy policies and inadequate dispute resolution tools encourage litigiousness and bickering in and between local governments and the development community.

West Hollywood is not questioning the intent of the LACTC; however, the CMP as it has been so far elaborated fails to include specific, effective provisions and procedures which will achieve the goals set for the for the program. The EIR should properly review the likely consequences of the CMP as proposed, not its intent. In several places, the EIR refers to programs which have not yet been developed, processes rather than results, and findings which have not yet been made as the basis for its argument that the program will not encourage sprawl, burden local governments, encourage auto use and incite disputes.

SPRAWL

Throughout the EIR, there are references to the possible negative consequences which would occur if the CMP encourages deconcentration. This is a very significant issue. Each reference leads to Section IV A, Growth Inducing Impacts. This section, which provides the foundation for many of the conclusions listed in the EIR is a three-page rhetorical argument without supporting analytical quantitative or research documentation except for the Growth Management Plan figures on population growth. This information is not sufficient basis for the finding that the CMP will not

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encourage sprawl.

Even within the argument given, the logic is spotty. The section identifies three factors which lead to deconcentration in Los Angeles County: 1. desire for affordable housing, 2. desire to avoid urban development and 3. reliance on auto as primary transportation. It then goes on to state that, within this context, the CMP will be insignificant. However: the transportation system is the rubber band holding the Los Angeles County development together. The capacity and congestion of the roadway system determine how many people move away from the urban area, and how far they can move, without losing the benefits of working and living in the regional economy and job market.

Sprawl is already happening. If the LOS remains constant, so should the growth in sprawl. If the roadway LOS is allowed to deteriorate, then sprawl will be inhibited; people will not be as willing to move around the basin.

In paragraph two of the Growth Redistribution section, the EIR argues that the CMP may inhibit deconcentration by the TDM element and transit capital improvements. This brings up an important point: Until the decision maker knows what specific improvements and programs will be funded by the CMP money or required by its provisions, he or she will not have enough information to determine how much deconcentration will occur. The EIR therefore fails to accurately characterize the consequences of the CMP; it is impossible to characterize those consequences without a knowledge of what specific projects and requirements it will engender.

In paragraph three of this section the EIR states that both very good and very bad levels of service can encourage deconcentration. But they do not both encourage the type of sprawl which characterizes growth in much of Los Angeles County. Poor levels of service encourage concentrated self-sufficient service areas separated from the urban center, not a diffuse web of urban development. Poor levels of service serve as an incentive for individuals to decrease their vehicle miles traveled, in order to save time.

Paragraph four discusses whether the CMP will encourage growth in outlying areas. This discussion is vague and unconvincing. Although growth rates are higher in outlying areas, absolute growth in dense areas such as the westside of Los Angeles has also been significant. In addition, this paragraph seems to indicate that there will be development fees for projects in the more congested areas. This is not included in the project description. Will the CMP deficiency plan require higher fees in congested areas? If this is that case, the EIR must discuss the implications of this for the developers, landowners and local governments in these areas.

FISCAL IMPACT ON LOCAL GOVERNMENT & DEVELOPMENT COMMUNITY
Throughout the EIR there are references to deficiency fees and other fees. However, the LACTC has not adopted a deficiency plan for the CMP yet. It has given direction that

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fees are unacceptable at the County level. If the CMP is to require or have the effect of requiring local jurisdictions and local developers to pay fees, then the fee requirements must be spelled out before decision-makers will have enough information to assess their impacts. Now, local governments are financially strapped by the twin burdens of the recession and the state budget cuts. Any assessment of fees would have a significant impact on local governments, as would any requirement which had the effect of requiring local governments to collect additional fees from developers.

In addition to these strictly financial concerns, the CMP, because of its monitoring conditions and other procedural requirements, will require significant commitments of local government staff time for implementation. In this time of fiscal crisis and cutbacks, the addition of mandated duties and programs limits the flexibility of locals to respond to financial crisis and assign staff to programs of top local priority and urgency. This problem is neither acknowledged nor addressed sufficiently in the EIR.

Finally, the EIR calls into question whether there has been a nexus established between the scope and size of the deficiency plan and fees and the actions of local government in approving development projects. As stated above, the EIR assumes in places that there will be deficiency requirements and/or fees assessed at the local level on or as the result of developer fees. It seems to assume that local governments and developers will be responsible for shouldering the burden of maintaining LOS standards. However, according to the EIR itself, natural growth accounts for most of the growth and growth in congestion anticipated in future years. Developers can not be required to mitigate growth due to this natural increase. If the CMP has the effect of requiring fees or programs to maintain the level of service, without establishing the legal nexus for those requirements, it will expose local government to significant liability from developers' lawsuits. This issue has not adequately been addressed in the EIR.

INCENTIVES FOR AUTO USE

The EIR does not identify which specific programs and projects will be funded or required as the result of the CMP. Because it is so vague, the EIR does not contain adequate information to determine whether it will encourage auto use more than alternative transportation. However, the requirement that LOS be maintained, coupled with the extremely weak TDM ordinance proposed, indicate the likelihood is that the CMP will favor auto transportation rather than increased use of alternative transportation.

LITIGIOUSNESS & DISPUTE RESOLUTION

The project description for the CMP is vague and incomplete, reflecting the present state of the CMP itself. The EIR does not adequately address the incentives this vagueness may create for lawsuits and disputes between affected parties with conflicting interests.

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p. S-27 The Southern California Association of Governments has not yet certified that the CMP is consistent with either the Regional Mobility Plan or the Air Quality Plan; therefore it is misleading to use consistency with these plans (which is yet to be established) as evidence that the impacts will be insignificant.

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p. S-27 The section on financial consequences may be misleading. The only funds which will actually be lost are increased Prop 111 gas tax funds. An alternative congestion reduction program could be developed to meet federal requirements. It is not clear that these funds were programmed into the STIP and included in the RMP.

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p. S-27 The distribution of funding and programs between auto facilities and programs and those to encourage alternate modes is not yet established. The RMP includes a careful balance of facilities and alternative mode incentives. To the extent that the CMP provides funding for auto facilities more than alternative modes, it could upset the RMP balance and encourage auto use and sprawl, even though it financed only "unfunded" portions of the RMP.

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p.4 The TDM element as proposed so far includes on a nominal TDM ordinance which is not expected to have a measureable effect on use of alternate modes.

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p.4 The Land-use analysis ignores the impact of smaller projects. The legislation calls for mitigation of impacts, not just the "significant impacts" included under CEQA.

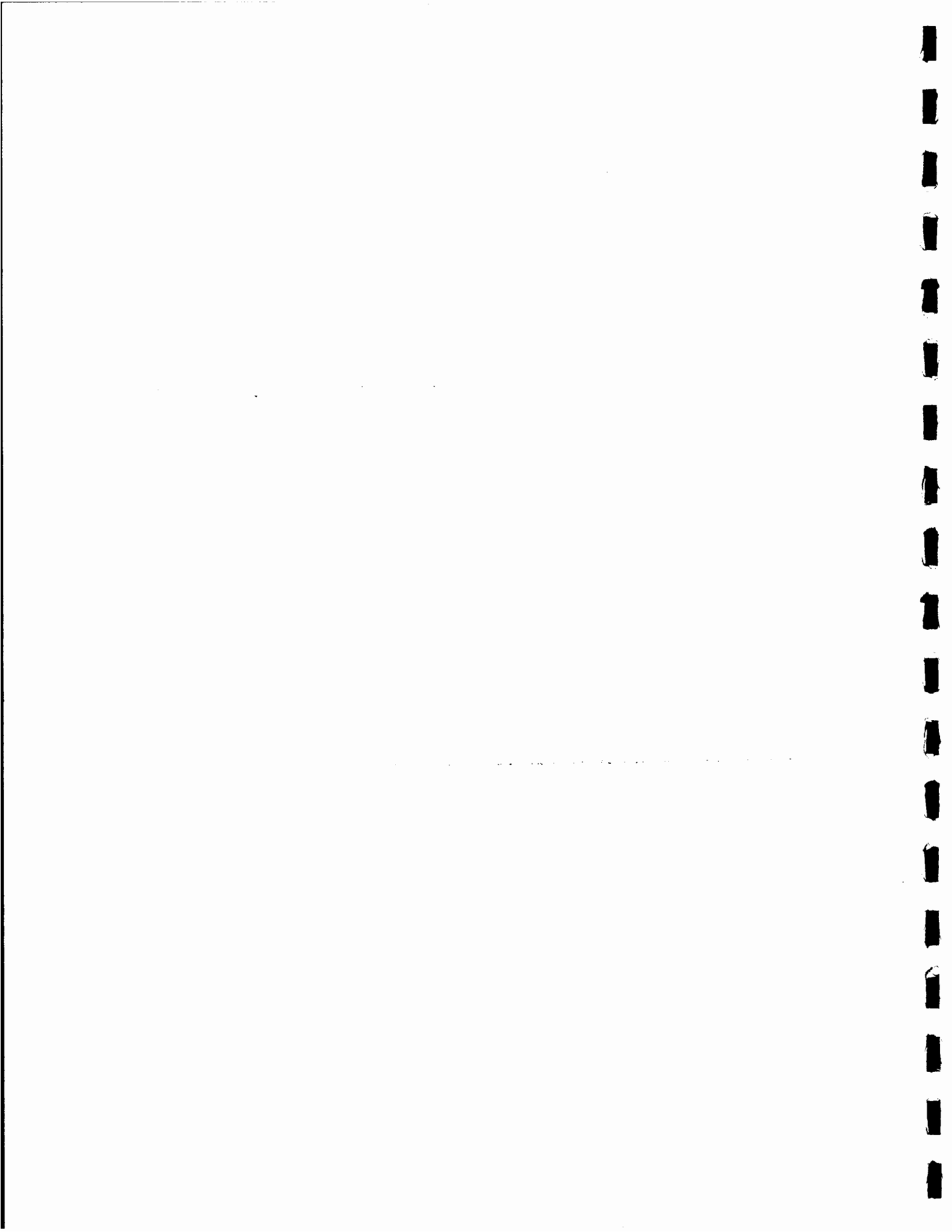
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p.37 What is the county-level process that will work toward the attainment of Regional Mobility goals? What indication is there that it will be any more effective than processes and programs in place before the CMP?

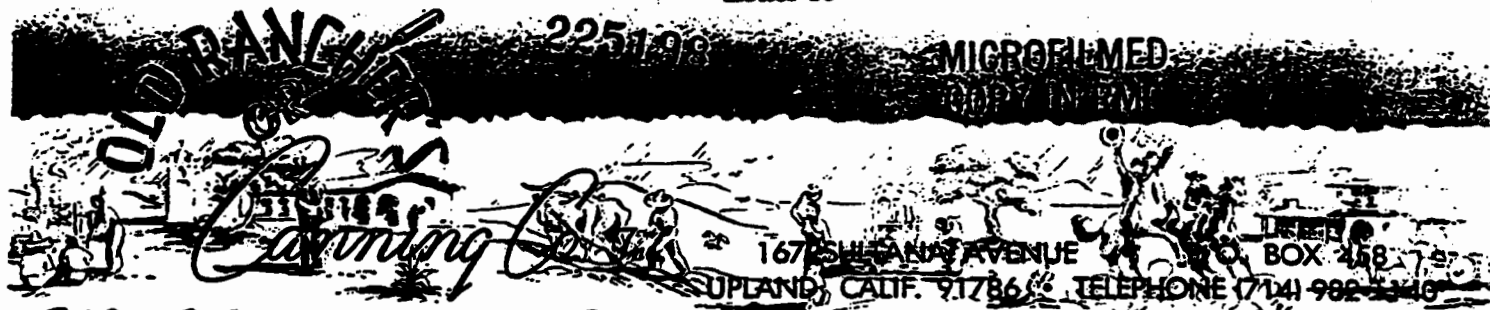
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**Letter 18 Response to Comments from William Graber, Old Rancher's Canning Co.,
August 26, 1992.**

228. See Response to Comment 87.



225198

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August 26, 1992

Ms. Kendra Morries, Project Manager
Congestion Management Program
LACTC
818 West Seventh Street, MS 2200
Los Angeles, CA 90017

Subject: Public Comments, Draft EIR, CMP

Dear Ms. Morries:

On August 20, I was a guest at SCAG's Regional Advisory Council meeting during which I received for review and comment a copy of the LACTC Congestion Management Program draft EIR. Please accept these comments as a portion of the public testimony on CMP EIR.

I would like to present some observations which have surfaced as a result of my recent participation in the City of Upland's Town Center Zoning Task Force - and the statewide Growth Management issue. I will limit these comments to the relationship between the need for transportation pricing reform, mixed-use development, and compact densities around future transit stations in the region.

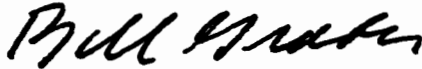
Throughout the Upland Town Center zoning discussion I was an advocate for zoning incentives that would encourage higher densities, mixed-use in nature, than were previously possible in Upland. I adopted this position because of the Town Center's proximity to a future commuter rail station and because of my belief that the combination of mixed-use development and commuter rail would offer a balanced growth management approach to the development of downtown Upland. I have since come to believe that without a strong commitment to transportation pricing reforms which increase the attractiveness of public transportation, higher density development around Upland's commuter rail station will result in a net increase traffic congestion - not a decrease. Thus, while I am supportive of the concept of "increased density in targeted center areas" I believe that if the CMP does not encourage mixed use development and transportation pricing reforms, the "level of significance after mitigation" referred to in Impact A.5 on Page S-4 will, in fact, be significant - not "less than significant" as now indicated.

Every available opportunity within the CMP should be utilized to promote mixed-use development as a means of balancing jobs and housing and as a means of reducing traffic congestion. The need for transportation pricing reforms goes without question. Comprehensive traffic congestion management must include, for example, the use of

higher gasoline taxes to subsidize the operation of efficient, inexpensive public transportation in order to assist the low-moderate income segment of the population to participate in the transition from automobile to alternative transportation without excessive burden. If the CMP does not address the issues of both mixed-use development and inexpensive, efficient transit alternatives, compact densities will simply increase traffic congestion. Thus, State and CMP mandated programs offering incentives for compact development in urban areas must be accompanied by reasonably priced transportation and mixed use development.

Thank you for the opportunity to comment.

Sincerely,



William Graber

cc: Mark Pisano, SCAG
David Stein, SCAG

a: CMPEIR

B. RESPONSES TO PUBLIC HEARING COMMENTS

Speaker 1 Response to Comments from Gerald Ford, Assistant City Administrator, City of Vernon.

229. The Commission has given very strong direction to staff not to pursue mitigation fees any further and to look at alternatives to fees as part of the Countywide Congestion Study being done as part of the development of a deficiency plan strategy. The Commission has taken the position that a County-wide mitigation fee is not an appropriate way of dealing with deficiencies on the system. The work staff will be doing over the next year in developing a County-wide deficiency plan process is to find other ways that do not require a fee.

Please refer also to response to Comment 3.

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(A brief presentation was made by Kendra
Morries, Brad Mcallester, and Susan O'Carroll.)

MS. MORRIES: With that we're going to
turn it over to you, anybody who has any testimony or
questions or comments that you want to give on the
EIR. I've got one speaker card: Mr. Ford.

MR. FORD: I think we should have broken
down into groups so we could have handled this crowd a
little better. My name is Gerald Ford, and I'm
assistant city administrator for the City of Vernon.
Vernon is a small industrial manufacturing community
four miles southeast of downtown L. A.

Our concerns evolve around the potential
for the mitigation or impact fees that the CMP is
considering. I think given today's economy and the
phenomenon that's going on in California with
industries leaving California because of regulatory
fees, workers comp fees, and assorted other issues,
we're very concerned with any additional fees which
would just augment that industrial flight.

We would hope that LACTC would be
sensitive to that issue and be concerned about any
fees that they would be considering. I think we
passed Prop C, and there's moneys that are available

1 for traffic -- improvement of the traffic and
2 transportation systems, and I'm not so sure that if we
3 came back and said we wanted to impose mitigation
4 fees, that a lot of these businesses aren't going to
5 feel that they're being hit twice with a gas tax, and
6 now we've got to pay because we're putting in a
7 development, and we're creating jobs.

8 I think California is at a critical time.
9 Most of you know we've got legislators up there that
10 are loggerheads, and they've been loggerheads for
11 about 50 days now. They still have not resolved the
12 budget crisis for California.

13 In concluding I'd just -- again I would
14 hope that LACTC would consider the other agencies that
15 are out there that are doing the same thing, putting
16 out new impacting mitigation fees and charges for
17 things such as water through the sand district and NWD
18 and Southern California Air Quality Management
19 District, and air regulations and air fees, and be
20 sensitive to what's happening there and how much it's
21 costing us and how much it would impact buildings
22 necessary to Southern California. Thank you.

23 MR. MCALLESTER: If I could -- just to
24 reiterate the position of the commission as far as
25 mitigation fees. They've taken a very strong

1 direction to staff not to pursue mitigation fees any
2 further, and with the concerns that you've raised,
3 directed staff to do this congestion study to look at
4 alternatives.

5 MR. FORD: At the workshop that you held
6 in Vernon, the impression I got was that for the first
7 year impact fees were off the table, but I left that
8 meeting feeling that they're off the table, we're
9 going to report the impact, and the second year you
10 will discuss the deficiencies and the mitigation
11 fees. Now, are you telling me that the mitigation
12 fees are off the table at infinitum?

13 MR. MCALLESTER: They're off the table in
14 the foreseeable future. The commission actually took
15 the position that this is not an appropriate way of
16 dealing with deficiencies on the system, that they're
17 not supportive of us pursuing a look at fees whether
18 it be now or next year, and that the work we will be
19 doing over the next year in developing a county-wide
20 deficiency plan process is to find other ways that do
21 not require a fee. But it's a real important point
22 that you brought up.

23 MR. FORD: Right. And I understand that.
24 I just, you know, because this is a public hearing, I
25 want to make our concerns known as they are at least

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on the table and addressed by the commission.

MR. MCALLESTER: We appreciate that.

MS. MORRIES: Any other comments that anybody wants to give? I've never had this happen before. This is a little strange. If there are no other comments or questions about the EIR, I guess we will considered ourselves adjourned. Thank you for coming. Hit the beach. It's real close.

MR. MCALLESTER: Thank you all for coming.

(At 2:45 P.M., the hearing was concluded.)

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STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)

I, KIM ARIAL, do hereby certify:

That the foregoing hearing proceeding was taken before me at the time and place therein set forth and was taken down by me in shorthand and thereafter was transcribed into typewriting under my direction and supervision, and I hereby certify the foregoing transcript is a full, true, and correct transcript of my shorthand notes so taken.

I further certify that I am neither counsel for nor related to any party to said action nor in any way interested in the outcome thereof.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 21st day of August, 1992.


KIM ARIAL

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**LOS ANGELES COUNTY CONGESTION
MANAGEMENT PROGRAM
PUBLIC HEARING**

**THE TRANSCRIPT OF PROCEEDINGS OF LOS
ANGELES COUNTY CONGESTION MANAGEMENT PROGRAM, taken at
the Pasadena Center, 300 East Green Street, Pasadena,
California, at 9:00 A.M., Thursday, August 20, 1992,
before KIM ARIAL, pursuant to Public Notice.**

APPEARANCES:

- KENDRA MORRIES**
- SUSAN O'CARROLL**
- BRAD MCALLESTER**
- VIRGINIA HUNTER**

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(A brief presentation was made by Kendra
Morries, Brad Mcallester, and Susan O'Carroll.)

MS. O'CARROLL: ... With that we move to
public comments.

MS. MORRIES: Is there anybody who wants
to comment on the EIR at this time? No questions? No
takers? I guess we're adjourned.

MR. MCALLESTER: Are you sure? Positive?
Well, thank you all for coming.

MS. MORRIES: We appreciate you
coming out and taking the time.

(At 9:30 A.M., the hearing was concluded.)

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STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)

I, KIM ARIAL, do hereby certify:

That the foregoing hearing proceeding was taken before me at the time and place therein set forth and was taken down by me in shorthand and thereafter was transcribed into typewriting under my direction and supervision, and I hereby certify the foregoing transcript is a full, true, and correct transcript of my shorthand notes so taken.

I further certify that I am neither counsel for nor related to any party to said action nor in any way interested in the outcome thereof.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 26th day of August, 1992.


KIM ARIAL

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**LOS ANGELES COUNTY CONGESTION
MANAGEMENT PROGRAM
PUBLIC HEARING**

**THE TRANSCRIPT OF PROCEEDINGS OF LOS
ANGELES COUNTY CONGESTION MANAGEMENT PROGRAM, taken at
El Segundo Public Library, 111 West Mariposa, El
Segundo, California, at 2:00 P.M., Wednesday, August
19, 1992, before KIM ARIAL, pursuant to Public Notice.**

- APPEARANCES:**
KENDRA MORRIES
SUSAN O'CARROLL
BRAD MCALLESTER
VIRGINIA HUNTER

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SPEAKER:

GERALD W. FORD
4315 Santa Fe Avenue
City of Vernon
Concerned re: Impacts on local businesses.



October 30, 1992

MEMO TO: PLANNING AND MOBILITY IMPROVEMENT COMMITTEE -
NOVEMBER 11, 1992 MEETING

FROM: NEIL PETERSON

SUBJECT: CERTIFICATION OF THE CMP ENVIRONMENTAL IMPACT
REPORT AND ADOPTION OF THE 1992 CONGESTION
MANAGEMENT PROGRAM

ISSUE

This item requests that the Commission take the recommended actions necessary to complete and certify the Environmental Impact Report and adopt the 1992 Congestion Management Program.

RECOMMENDATION

1. Certify that the Commission has independently reviewed the EIR and that it conforms to California Environmental Quality Act (CEQA) requirements and that the report reflects the Commission's independent judgement.
2. Adopt the 1992 Congestion Management Program.
 - Adopt the Statement of Findings and Overriding Considerations (Attachment 2).
 - Adopt the Mitigation Monitoring Plan (Attachment 3).
 - Direct staff to file a Notice of Determination.

RELATIONSHIP TO THE 30-YEAR INTEGRATED TRANSPORTATION PLAN

The development and implementation of the Congestion Management Program are directly supportive of the goals and objectives of the 30-Year Plan. The CMP is a statutory requirement for transportation programming decisions made by the Commission.



Los Angeles County
Transportation
Commission

818 West Seventh Street
Suite 1100
Los Angeles, CA 90017
Tel 213 623-1194

00058
Leading the Way to Greater Mobility

BUDGET IMPACT

Local jurisdictions will incur some costs in implementing responsibilities identified in the 1992 Final Draft CMP, such as traffic counts, TDM Ordinance implementation, and local land use analysis. These responsibilities have been developed with significant participation from local jurisdictions in an effort to streamline implementation and minimize local costs. Local costs in implementing CMP responsibilities are eligible for Proposition 111 local subvention funds. TDM implementation is also eligible for Proposition C Local return funding.

BACKGROUND

1. 1992 FINAL DRAFT 1992 CONGESTION MANAGEMENT PROGRAM

The CMP is a new program mandated by State Government Code Section 65088, et. seq., enacted in June of 1990 with the passage of Proposition 111, which increased state gas tax.

By statute, LACTC was given a one year extension to adopt the CMP, because it was determined that an EIR was necessary. In accordance with this extension, LACTC must adopt its CMP by December 1, 1992. Failure to adopt by this statutory deadline could jeopardize State funding for projects already approved by the California Transportation Commission in the 1992 State Transportation Improvement Program (STIP). Additionally, AB 1435 prevents federal ISTEA funding from being programmed unless a CMP is adopted by December 1992.

The 1992 Final Draft CMP includes the following elements:

Highway and Roadway System: The CMP highway network consisting of approximately 1,000 miles of State highways and regional arterials received Commission concurrence in January 1992. All local jurisdictions and Caltrans have successfully completed traffic counts on the CMP system, which are the basis for establishing highway level of service standards.

Transit Analysis: A transit monitoring network was established as a planning tool to monitor changes in transit service that aid in congestion relief to the CMP highway system. Performance standards for routing and frequency have been developed that will give the Commission an annual picture of changes in transit service provided on a corridor basis and assist in identifying future transit needs.

TDM Element: The TDM Element identifies local responsibilities for developing and implementing a CMP TDM Ordinance. A model

PLANNING MOBILITY AND IMPROVEMENT COMMITTEE - 11/11/92
1992 CONGESTION MANAGEMENT PROGRAM
Page 3

ordinance was developed to identify minimum standards for local ordinance development, and to assist local jurisdictions in TDM implementation. The ordinance 1) identifies "TDM friendly" facility standards for new non-residential development, and 2) requires local jurisdictions to coordinate with transit operators through the CEQA process regarding the impact of new development on transit operations. The Commission released the model TDM ordinance in August 1992, and it has been distributed to local jurisdictions so that they may initiate development of local ordinances based on the model ordinance.

Land Use Analysis Program: In March 1992 the Commission took action directing staff not to pursue a countywide mitigation fee in meeting CMP land use and deficiency plan requirements. As a result, an alternative land use program has been developed to provide a standard procedure for examining the regional impacts of new development on the CMP system when preparing EIRs. The purpose of this requirement is to provide consistent information through the CEQA process, that will assist local jurisdictions in assessing regional impacts. Decisions on how to address such impacts are solely the responsibility of the lead local jurisdiction.

Capital Improvement Program: The Capital Improvement Program identifies those State funded projects that are already included in the 1992 STIP. These projects have already been reviewed by SCAG for regional consistency and air quality conformity. Statute requires that these projects be included in the CMP in order to remain eligible for State funding.

Future CMP Activities: In March 1992, the Commission directed staff to initiate a technical study to assess future deficiencies on the CMP system and develop a countywide approach to address CMP deficiency plan requirements without a mitigation fee. The Countywide Congestion Study is currently underway to comply with this direction. The study is in its early stages, and therefore, is not a part of the 1992 CMP. It is important to note that a deficiency plan process is not a required element of the 1992 CMP. The Countywide Congestion Study is scheduled for completion in Spring 1993 and will form the basis for the deficiency plan process that will be presented to the Commission as part of the November 1993 CMP Update.

The CMP has been developed over a two year time span and has evolved through public review of three previous draft programs. Numerous written and verbal comments have been received at all stages of CMP development. Since 1991, a 37-member Policy Advisory Committee and a separate Technical Forum have been meeting monthly. The Policy Advisory Committee consists of representatives reflecting a cross-section of local

jurisdictions countywide, representatives of regional and state agencies (Caltrans, SCAG, RTD, Commuter Transportation Service and SCAQMD), as well as representatives of the environmental and business communities. The Technical Forum does not have formal membership but serves as an open forum for technical staff of local jurisdictions. Two contacts for each jurisdiction receive notices and materials for upcoming Technical Forum meetings. Ad-hoc technical committees were also formed to deal with special CMP issues such as highway analysis, transit, TDM, transportation impact analysis, and private sector issues. In addition, a variety of other mechanisms have been used for public outreach and consultation. Examples include mailing of a monthly newsletter to over 1900 people and establishment of a telephone hotline for CMP issues.

The Final Draft CMP was released in September 1992 for the final review of local jurisdictions and other interested parties. Written comments were requested by October 30th, and are included in Attachment 1. This draft was also presented as a discussion item at the October 1992 Planning Mobility and Improvement Committee and the Commission meetings. As a result of comments received, minor technical modifications have been made to the CMP, primarily for clarification purposes. The most significant comments made relate to meeting CMP Deficiency Planning requirements, including:

- The development of a countywide approach to meet deficiency plan requirements.
- Coordination of CMP TDM strategies with air quality requirements.
- Providing incentives for alternative land use scenarios that reduce trips on the CMP system.
- Credits for public and private contributions to regional system improvements.

These issues will be addressed through the Countywide Congestion Study currently underway. The results of the Study will be presented to the Commission for their consideration as part of the 1993 CMP Update.

2. THE CONGESTION MANAGEMENT PROGRAM EIR

The Draft EIR and Response to Comments on the Draft EIR were previously distributed to PMIC. The Draft EIR analyzed the potential of the CMP to create significant environmental impacts. This document also analyzed alternatives to the proposed CMP and

recommended a set of measures to mitigate any potentially significant adverse impacts identified in the Draft EIR. The Draft EIR concludes that with implementation of the recommended mitigation measures, no significant direct or indirect program level adverse impacts would result from the CMP. The potential for significant project level impacts to remain after implementation of CIP specific mitigation can only be assessed on a project specific basis. For this reason, the EIR identifies the potential for significant unavoidable CIP project-level adverse impacts on: Land Use, Transportation, Noise, Air Quality, Geology, Water Resources, Biological Resources, Cultural Resources, and Public Services.

Compliance with CEQA requirements, as related to the EIR was met in the followings ways:

- December 6, 1991 Notice of Preparation released
- Filed with County Clerk and State of California; copies distributed to all local jurisdictions and over 850 other individuals/organizations.
- June 5, 1992 Revised Notice of Preparation released to reflect CMP program changes
- Filed with County Clerk and State of California; copies distributed to all local jurisdictions and over 850 other individuals/organizations.
- July 24, 1992 Draft EIR released
- Notice of Availability (NOA) published in LA Times; EIR and NOA/NOC filed with County Clerk and State of California; copies distributed to all local jurisdictions and over 300 other individuals/organizations.
- August 19/20, 1992 Public EIR Workshops conducted
- October 28, 1992 Response to Comments on Draft EIR released

The Commission, as the lead agency under the California Environmental Quality Act (CEQA), is required to make findings with regard to each significant impact of the proposed project, in conjunction with approving and adopting the project. A description of the effects of the project and the proposed mitigations and findings with regards to the effects are

summarized in Attachment 2 , Statement of Findings and Overriding Considerations.

The Commission is also required to adopt a Mitigation Monitoring Plan. Attachment 3 describes each mitigation measure, the agency responsible for implementation, the agency with monitoring responsibility and reporting requirements.

Upon certification and adoption of the project, staff will file the required Notice of Determination with the Los Angeles County Clerk and the Governor's Office of Planning and Research.

PREPARED BY: BRADFORD W. MCALLESTER
ADMINISTRATOR
CONGESTION MANAGEMENT PROGRAM

Neil Peterson for
NEIL PETERSON
EXECUTIVE DIRECTOR

Attachments:

- Final Draft CMP Comments (Attachment 1)
- Statement of Findings and Overriding Considerations (Attachment 2)
- Mitigation Monitoring Program (Attachment 3)
- Final Draft CMP - Revised November 1992
- Draft EIR (Not attached, submitted in July 1992 Commission Package)
- Response to Comments on the Draft EIR (Not attached, submitted in October 1992 Commission package)

ATTACHMENT 2

FINDINGS, FACTS IN SUPPORT OF FINDINGS AND
STATEMENT OF OVERRIDING CONSIDERATIONS
REGARDING THE ENVIRONMENTAL IMPACT REPORT
FOR THE LOS ANGELES COUNTY
CONGESTION MANAGEMENT PROGRAM
(STATE CLEARINGHOUSE NO. 91121063)

1.0 INTRODUCTION

1.1 State Law. The State Guidelines ("Guidelines") promulgated pursuant to the California Environmental Quality Act ("CEQA") provide:

No public agency shall approve or carry out a project for which an EIR has been completed which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

a. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR (hereinafter referred to as "finding (1)").

b. Such changes or alternations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency (hereinafter referred to as "finding (2)").

c. Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR (hereinafter referred to as "finding (3)").

The required findings shall be supported by substantial evidence in the record. (Guidelines section 15091.)

1.2 Findings. An Environmental Impact Report (EIR) pursuant to CEQA has been prepared by the Los Angeles County Transportation Commission (Commission). The EIR for the Los Angeles County Congestion Management Program (CMP or Project) identifies significant effects on the environment which may occur as a result of the Project. Section 2.0 of this attachment identifies the significant environmental effects of the Project which cannot

feasibly be mitigated below a level of significance. Section 3.0 sets forth potentially environmental effects of the Project which are not significant because of the design of the Project or which can feasibly be mitigated to below a level of significance. Section 4.0 summarizes the alternatives discussed in the EIR and makes findings with respect to the feasibility of alternatives and whether the alternatives would lessen the significant environmental effects of the Project. Section 5.0 sets forth a Statement of Overriding Considerations with respect to the Project.

The EIR and the administrative record concerning the CMP provide additional facts in support of the findings herein. The mitigation measures set forth in the CMP EIR and the Mitigation Monitoring Program (Attachment 2) are incorporated by reference in these findings, and the findings in sections 2.0 and 3.0 refer to individual mitigation measures as appropriate.

1.3 Scope of the Project for Environmental Review. The EIR for the CMP is a "program EIR." Under the CEQA Guidelines, a program EIR may be prepared for projects which are characterized as a series of actions that are parts of the chain of contemplated actions, in connection with the issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program. A program EIR for a project such as the adoption of a plan should focus on the secondary effects that can be expected to follow from the adoption of the plan, but need not be as detailed as an EIR on specific construction projects that might follow consistent with the plan. The CMP EIR identifies general county-wide effects of the CMP, and identifies general areas of environmental sensitivity which, where necessary, may need to be evaluated in greater detail in project-specific EIRs, for projects undertaken consistent with the CMP.

Further, the CMP EIR is "tiered" from the EIR prepared for the Regional Mobility Plan (RMP) by the Southern California Association of Governments (SCAG). Tiering is authorized by the CEQA Guidelines to focus environmental analysis on those issues ripe for decision at each point in the planning process. Therefore, the scope of environmental review of the CMP EIR is limited to potential environmental effects related to the CMP Project which were not previously analyzed as part of the environmental review of the RMP.

Similarly, environmental review of specific facilities undertaken consistent with the CMP is expected to be tiered from the CMP EIR. As the "middle tier" of the environmental review, the CMP EIR addresses the program-level impacts of the CMP, and identifies areas of project-level potential impact which should be considered in later tiers of environmental review, but which

cannot feasibly be evaluated in detail at the program level.

2.0 FINDINGS REGARDING POTENTIAL ENVIRONMENTAL EFFECTS THAT CANNOT BE MITIGATED BELOW A LEVEL OF SIGNIFICANCE.

The following sets forth all significant environmental effects of the CMP, and with respect to each effect, makes one or more of the findings set forth in the Introduction above, states facts in support of such findings, and, as appropriate, refers to the Statement of Overriding Considerations which is attached hereto.

2.1 Land Use and Planning.

2.1.1. Significant Effect. Projects associated with the Capital Improvement Program (CIP) element of the CMP could affect land use in various ways, including potential community disruption and displacement, changes in community character, community revitalization effects, personal mobility and accessibility effects, and transportation opportunities for special groups such as the elderly, the handicapped and low income households. The following classes of CMP CIP projects could lead to the localized displacement of adjacent businesses and residents: Class 1 - freeway system management (specifically the construction of HOV lanes), Class 2 - freeway gap closures, Class 6 - rail improvements, Class 4 - commuter rail stations, transit centers and park-and-ride lots, and, to a more limited degree, Class 3 - arterial system improvements. Classes 2, 3 and 6 present the greatest potential for disruption.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Land use impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measures adopted in conjunction with the RMP serve to mitigate these potential impacts at the regional level. The RMP EIR includes the following mitigation measures for community displacement:

- Select route alignments, locations for supporting facilities, and design features that minimize displacement of residents and businesses. Route alignments for transit guideways should strongly consider use of existing transportation right-of-way, such as highways and railways, in order to avoid or minimize displacement. Design features should consider use of depressed, elevated or underground facilities, and reduction in width of right-of-way where significant displacement is a possibility.
- Where displacement is unavoidable, relocate displaces in accordance with state and federal laws (Uniform Relocation and Real Property Acquisition Policies Act), which provide for monetary compensation for acquired properties, moving expense payments, supplemental payments for replacement housing (or rentals), and relocation assistance.
- Avoid protracted waiting periods between right-of-way designation, property taking and construction, in order to minimize potential neighborhood deterioration due to neglected maintenance, early move-outs, vandalism and value losses.
- Provide housing adequate to meet potential housing shortages created by right-of-way acquisition by providing new or rehabilitated housing, or relocation of housing from acquired right-of-way.

(3) The RMP EIR includes the following mitigation measures for accessibility/mobility impacts:

- Maximize connectivity between transportation service area boundaries and different modal systems through intermodal transfers and intersystem schedule coordination.
- Establish transit fare structures that encourage use of new transit facilities by the elderly and handicapped.
- Use vehicle and station design measures that assure maximum use of transit guideway facilities by the handicapped.

- Continue expansion of paratransit and local bus service in conjunction with transit guideway development to provide maximum service to the elderly and handicapped.

(4) The CMP's Land Use Analysis Program in combination with CMP network monitoring and modeling will provide better information on which local jurisdictions can base land use planning.

(5) Mitigation measure A.4 is hereby incorporated by reference.

(6) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future, consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(7) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.1.2 Significant Effect. Construction of CMP CIP projects may disrupt the normal activities of neighboring land uses because of traffic reroutings, traffic congestion, restricted access to nearby businesses, restricted parking, interference with pedestrian and vehicular circulation, visual unslightliness, and dust, noise and fumes generated by construction.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Land use impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measures adopted in conjunction with the RMP serve to mitigate these potential impacts at the regional level. The RMP EIR includes the following mitigation measures for community disruption:

- Use construction techniques that minimize disruption effects of facility construction.
- Select route alignments and design features that minimize barrier effects within communities. Use street and pedestrian over and underpasses where possible to avoid broken linkages in local access. Minimize at-grade crossing of transit facilities and other local traffic, and/or utilize transportation engineering measures to minimize traffic delays. Use existing physical barriers such as highways and railways for future facility development to the extent possible.
- Through the general plan, zoning and subdivision process seek to achieve a satisfactory relationship between transportation development, and current and future development plans. Maximize redevelopment opportunities resulting from new facilities.
- Minimize increased congestion from autos and buses accessing transit stations, centers and parking lots through proper location and design of facilities, and traffic engineering.

(3) Mitigation measure A.4 is hereby incorporated by reference.

(4) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(5) It is infeasible to completely avoid the

significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.2 Transportation.

2.2.1 Significant Effect. Construction and operation of individual facilities could create localized traffic congestion impacts. Impacts which may result from the implementation of specific transportation improvements include construction impacts, increased traffic in the vicinity of transit stations, and traffic in residential neighborhoods attempting to reach a regional highway facility.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Transportation impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) The CMP Transit Element, Land Use Analysis Program and Highway and Roadway System Element will provide monitoring information to assist in the planning of transportation improvements that would have a beneficial effect on a regional basis, and may serve to minimize trips on the CMP highway system and encourage alternative uses, as well as to encourage development patterns which reduce trips, resulting in beneficial effects on the regional highway and transit systems.

(3) Mitigation measure B.1 is hereby incorporated by reference herein.

(4) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures

developed as part of CIP project environmental review can only be assessed on a project specific basis.

(5) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.3 Air Quality.

2.3.1 Significant Effect. The construction and/or operation of transportation improvement projects developed consistent with the CMP could have various localized negative air quality impacts adjacent to the improvement alignment or right-of-way. Construction of roadway or transit improvements would have short term construction impacts. Earth moving activities may increase localized particulate levels. Improvements to existing roadways could also require detours and delays during construction which could cause short term increases in emissions due to congestion. New route locations or freeway gap closures have the potential to bring mobile emission sources closer to existing sensitive land uses as well as to create new line sources of pollutant emissions in areas where such sources may not have existed before. Providing increased roadway capacity by widening or restriping may move vehicle travel lanes closer to sensitive land uses adjacent to a roadway. Creation of park-and-ride lots may have the potential to attract significant numbers of vehicles to parking locations. Particularly during peak periods, localized carbon monoxide "hot spots" may be created by vehicles idling or queuing at access points to parking facilities. As with park-and-ride lots, rail transit stations and transit centers could also become attractions to vehicles where commuter parking is provided or is a result of pick-up and drop-off activities. Station circulation may also impede vehicle flow on adjacent arterial streets and thus cause delays increasing idling and localized emissions.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Air quality impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and

incorporated in regional planning efforts.

(2) Mitigation measures B.1, C.1 and C.2 are hereby incorporated by reference.

(3) The CMP will contribute to a decrease in on-road emissions by maintaining established levels of roadway and transit service so as to minimize delays and congestion. Therefore, the CMP will have a beneficial effect on regional air quality.

(4) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(5) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.4 Noise.

2.4.1 Significant Effect. Noise from the construction of CMP CIP projects may be disruptive. Noise levels during construction are likely to be significantly higher than ambient conditions, due to the use of heavy earth-moving machinery and pile driving equipment. Although nighttime construction may be utilized to avoid daytime traffic delays, noise levels from activities during what is typically a sensitive time-period could be more pronounced and disruptive for adjacent sensitive land uses.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Noise impacts associated with the CMP are generally consistent with those described in the RMP EIR.

Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measure D.1 is hereby incorporated by reference.

(3) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(4) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.4.2 Significant Effect. Construction of new facilities consistent with the CMP, including construction of new routes, widening of existing facilities, operational improvements which would increase traffic speed and flow thereby incrementally increasing noise levels and construction of new transit stations or park-and-ride locations could result in project-specific significant noise effects.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Noise impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measure D.1 is hereby incorporated by reference.

(3) It is infeasible to adopt additional mitigation measures which address project specific impacts related to

facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(4) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.4.3 Significant Effect. CMP related improvements could increase the density of trips and traffic in center areas such as near transportation centers, rail transit stations, park-and-ride lots, etc. Increased traffic in these areas could increase both mobile and stationary noise levels in the vicinity of these new facilities.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Land use impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measure D.1 is hereby incorporated by reference.

(3) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(4) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.5 Geology.

2.5.1 Significant Effect. Construction of new highway and transit facilities, consistent with the CMP, particularly in new rights-of-way or previously undeveloped areas, could involve geotechnic or geological risks. Erosion could be potentially significant for large scale projects that involve major new roadway construction, especially in steep terrain or terrain with significant landforms. Erosion may be a particular problem in high desert areas where soil conditions and wind turbulence would be combine to create adverse situations. Improvements in hilly or mountainous areas would be exposed to the risk of potential slope failures, landslides, mudslides and rock falls. There would be a limited potential for subsidence or soil settlement-related impacts on improvements in coastal areas near the Port of Los Angeles. It is likely, however, that normal engineering practice would minimize any potential adverse effects with respect to subsidence and soil settlement. All new facilities are subject to seismic risks in the highly seismically active Southern California region. As indicated in the 1988 RMP EIR, it is expected that, with new engineering design criteria for earthquake resident structures, impacts from seismic activity on the proposed improvement projects would be less than on older, existing facilities.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Geology impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measure E.1 is hereby incorporated by reference.

(3) The potential for ground rupture to effect the network is limited to those facilities that cross active

fault zones such as the San Andres, Santa Monica/Hollywood, and the Newport Inglewood fault rupture zones.

(4) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(5) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.5.2 Significant Effect. CMP related improvements could increase pressures for increased population and employment density in areas adjacent to transit stations, transit lines, transportation centers, etc. New concentration of population or employment, particularly in multi-story buildings, could increase human exposure to seismic event risks.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Geology and seismic impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measure E.1 is hereby incorporated by reference.

(3) The potential for ground rupture to effect the network is limited to those facilities that cross active fault zones such as the San Andres, Santa Monica/Hollywood, and the Newport Inglewood fault rupture zones.

(4) It is infeasible to adopt additional mitigation

measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(5) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.6 Water Resources.

2.6.1 Significant Effect. Transportation facilities, developed consistent with the CMP, have the potential for creating adverse effects on beneficial uses, supply and demand and water quality. In particular, CIP Element components such as operating new or expanded highway routes, constructing stations or park-and-ride lots and widening or expanding existing highway routes could have water resources effects. Improvements to the transit system likely to cause effects would principally involve construction of rail facilities and fixed bus routes. Beneficial uses could be affected by transportation projects both through the destruction of habitat and through changes in surface water quality resulting from construction activities. Additionally, new projects could have effects on water quality including increased sedimentation and releases of vehicular oils and grease. The level of water pollution produced would be a function of the number and lengths of trips made on these new facilities, as well as project-specific mitigation measures.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Water Resources impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measures F.1 and A.3 are hereby incorporated by reference.

(3) With the exception of projects such as highways which contain large landscaped areas, little water would be required to serve most capital improvement projects, limiting the project-specific impacts on supply and demand.

(4) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(5) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.7 Biological Resources.

2.7.1 Significant Effect. Transportation facilities, developed consistent with the CMP, which are located in or near sensitive ecological areas as identified by the County of Los Angeles General Plan, or other areas of biological resource sensitivity may result in significant effects on biological resources.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Biological resource impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) Mitigation measures G.1 and G.2 are hereby incorporated by reference.

(3) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(4) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.7.2 Significant Effect. To the extent that the CMP results in a diversion of traffic to corridors which pass through sensitive ecological areas, or from already congested corridors to corridors which are currently relatively free flowing, leading to increased levels of congestion, traffic, and air pollution in proximity to sensitive ecological areas, the CMP may have an adverse effect on biological resources.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) The goal of the CMP is to improve or maintain current Levels of Service on the roadway network in Los Angeles County. To the extent that the CMP effectively maintains Levels of Service on roadways in the vicinity of sensitive ecological areas, the CMP would have a beneficial impact on biological resources as a result of reducing congestion and air pollution in the vicinity of significant biological resources.

(2) It is infeasible to presently evaluate the manner in which CMP programs will redirect traffic with respect to the location of significant ecological areas. Data collected through the highway and transit monitoring and Traffic Impact Analysis portions of the CMP will provide additional information on traffic patterns, which can be used in the design of specific future projects, and in

future CMP updates.

(3) Mitigation measure C.3 is hereby incorporated by reference.

(4) It is infeasible to completely avoid this significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.8 Cultural Resources.

2.8.1 Significant Effect. Transportation facilities, developed consistent with the CMP, have the potential to create significant effects on archaeological and paleontological resources and historic resources. Additionally, inclusion of a roadway or highway segment on the CMP network could encourage improvement projects on or near that segment, should service deteriorate below CMP Level of Service standard. This could potentially lead to impacts on historic structures; however, it is not possible to evaluate potential impacts of this kind until specific projects are proposed.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Cultural resource impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) While prehistoric sites or artifacts could be discovered in the urbanized areas of Los Angeles County, it is likely that any archaeological sites on the surface would have been destroyed during past urbanization. Generally, in the urbanized or urbanizing areas, archaeological and paleontological resources are uncovered during the construction phase.

(3) Site-specific studies required for each component project in the CMP CIP with the potential for significant impact on cultural resources will be required to determine whether significant archaeological or cultural resources are

actually present in the proposed alignment and the level of potential impact on those resources.

(4) Mitigation measure H.1 is hereby incorporated by reference.

(5) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(6) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.9 Public Services.

2.9.1 Significant Effect. The construction of individual CMP capital improvement projects, consistent with the CMP, may temporarily slow police or fire protection responses and disrupt police access or inhibit fire protection.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Public services impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) To the extent that the CMP is successful in improving or maintaining current Levels of Service on the roadway network in Los Angeles County, police response and fire protection response in emergency situations will be maintained or improved.

(3) Mitigation measures I.1 and I.2 are hereby incorporated by reference.

(4) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(5) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.9.2 Significant Effect. Some facility development projects may require additional right-of-way adjacent to existing parks and recreational facilities, which could reduce the already limited parkland in the County. Increased traffic volumes and/or speed in proximity to parks and recreation facilities could result in increased noise impacts and inhibit access to facilities.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Public services impacts associated with the CMP are generally consistent with those described in the RMP EIR. Therefore, these impacts have been evaluated and incorporated in regional planning efforts.

(2) To the extent that the CMP is successful in improving or maintaining current Levels of Service on the roadway network in Los Angeles County, the CMP would have a beneficial impact on parks and recreational facilities as a result of reduced congestion, air pollution, and ease of access.

(3) Site-specific studies required for each capital

improvement project of the CMP with the potential for adversely effecting parks and recreational facilities will determine the precise level of impact on those facilities.

(4) Mitigation measures I.1 and I.2 are hereby incorporated by reference.

(5) It is infeasible to adopt additional mitigation measures which address project specific impacts related to facilities which will be developed in the future consistent with the CMP. The potential for significant adverse land use impacts related to implementation of the CIP projects cannot feasibly be evaluated at a program level. The potential for significant adverse effects to remain after implementation of CIP project-specific mitigation measures developed as part of CIP project environmental review can only be assessed on a project specific basis.

(6) It is infeasible to completely avoid the significant effect due to the economic, social and other considerations described in section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

2.10 Cumulative Impacts

2.10.1 Significant Effect. The CMP may contribute to cumulative significant environmental effects in the following categories:

- Biological Resources. Several of the new highways and transportation corridors planned for the region traverse sensitive areas and may cause a loss of habitat or risk to rare or endangered species.
- Visual Resources. With proper design, new regional facilities will have a beneficial effect by opening access to scenic resources. However, construction of new freeways and transit guideways, especially aerial alignments, could disrupt or block views.
- Noise. Lower congestion may reduce trip diversion and neighborhood traffic intrusion, resulting in a cumulative beneficial noise impact. However, new roadways and transit facilities constructed in the region will add to existing noise sources. In particular, aerial alignments may expand noise contours. Also, alternative work schedules may create more traffic noise during sensitive times of day.
- Social Impacts. Some new facilities may result in

displacement of houses and businesses and a disruption of existing communities.

Findings. The Commission hereby makes findings (1), (2) and (3).

Facts in Support of Findings. The following facts or mitigation measures indicate that although the identified potential environmental effect has been reduced or avoided to the extent feasible, it cannot feasibly be mitigated below a level of significance. The remaining unavoidable effect is acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

(1) Mitigation measures adopted in conjunction with regional plans, including the RMP, GMP and AQMP have addressed the full range of feasible mitigation measures to minimize these potentially significant cumulative effects.

(2) It is infeasible to completely avoid these significant effects due to the economic, social and other considerations described in Section 5.0 Statement of Overriding Considerations, incorporated by reference herein.

3.0 POTENTIAL ENVIRONMENTAL EFFECTS WHICH ARE NOT SIGNIFICANT OR WHICH CAN BE MITIGATED BELOW A LEVEL OF SIGNIFICANCE.

The Commission has determined that the following potential environmental effects will not be significant for the reasons stated below.

3.1 Growth Inducing Impacts.

3.1.1 Potential Effect. The CMP has the potential to affect regional growth and may result in a redistribution of population and employment within the region.

Findings. The Commission hereby makes findings (1) and (2).

Facts in Support of Findings. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The CMP is designed to respond to, and help to manage congestion resulting from anticipated growth in the region. It is required to be consistent with SCAG's Regional Mobility Plan, a document which is linked both with the Growth Management Plan and the Air Quality Management Plan. Therefore, the CMP is consistent with existing projections of regional growth and relevant regional planning documents.

(2) Growth in the region is projected to be due primarily to natural increase rather than net in-migration. Approximately 63% of the anticipated growth and population is anticipated to result from natural increase. The remaining 37% of anticipated growth is projected to result from an excess of in-migration over out-migration. However, growth due to net in-migration is anticipated to be the result of 3.3 million individuals migrating to the area from other countries, rather than domestic migration. These would be new residents primarily attracted to the economic opportunities available in the United States. The Los Angeles region acts as the port of entry for large numbers of Pacific Rim and Latin American migrants.

(3) The purpose of the CMP is to maintain established Levels of Service on the County's transportation network. The CMP triggers remediation activities only on those portions of the system which degrade to LOS E, or which experience additional degradation within LOS F conditions. Given the nature of the anticipated population growth and the purpose of the CMP, it is not anticipated that the CMP would have any growth inducing impact on regional population. The causes of regional growth, discussed above, are largely independent of the implementation of congestion management efforts.

(4) Notwithstanding the conclusion that the CMP will not affect regional growth rates, it has been suggested that the CMP will have the potential to result in a redistribution of population and employment within the region. In particular, it has been suggested that the CMP has the potential to result in both localized density inducing impacts (concentration impacts), and regional sprawl related impacts (deconcentration impacts).

(5) Significant factors continue to exist in the Los Angeles region which encourage a deconcentration of land use and associated development of land in undeveloped areas. These factors are consistent with Los Angeles' historic development pattern. Such factors include the desire to purchase affordable housing, which is available in outlying areas of the County due to lower land costs; a desire to attain a quality of life which avoids the consequences of urban development such as congestion; and Los Angeles' reliance on the automobile as the major form of transportation in the region.

(6) Elements of the CMP may marginally serve to inhibit the current rate of deconcentration by reducing the attractiveness of the automobile as the major form of

transportation and increasing the attractiveness of alternative travel modes. In particular, the CMP's TDM Element and transit related capital improvements will serve to encourage non-automobile travel, and thereby discourage deconcentration effects.

(7) The potential deconcentration effect of the CMP is relatively insignificant compared to the economic and social factors leading to deconcentration. The conclusion that transportation factors are relatively insignificant in locational choices is supported by several recent studies, discussed in Response to Comment No. 26 in the Responses to Comments portion of the CMP EIR.

(8) Both very good and very bad Levels of Service on the highway system can be transportation factors which encourage deconcentration. However, it is not anticipated that the CMP will shift LOS to either extreme. When a system is too congested it may create a disincentive for continued development in the urban center and an incentive for development to move to less congested areas. CMP LOS standards have been established at the threshold of system capacity. By maintaining mobility at established Levels of Service, the CMP will not encourage deconcentration related to avoidance of congestion. Similarly, given the magnitude of the congestion problem in Los Angeles County, it is unlikely that improvements on the system will bring LOS above standards, which could create an incentive for deconcentration because of the ease of travel. The CMP is not anticipated to lead to substantial improvements above current Levels of Service and associated increases in travel speed which would make housing in outlying areas more attractive to the region's workers. Therefore, the CMP is not likely to result in deconcentration related to ease of mobility, or in deconcentration related to congestion in urban areas.

(9) The CMP will not result in any mobility-related pressure for deconcentration beyond the adopted growth and development projections of the region. The CMP alone will not effect the same level of mobility improvement as the RMP (which has a goal of recovering 1984 mobility levels). Therefore, since RMP mobility levels are included in regional projections, and the CMP will not improve mobility beyond RMP levels, the CMP will not result in additional growth or deconcentration affects related to increased mobility.

(10) The LOS standards of the CMP are the same as those of other County Congestion Management Plans in the region.

Therefore, growth will not be drawn across counties in response to differing LOS standards.

(11) The CMP statute requires the development of deficiency plans to mitigate or offset increases in congestion beyond established LOS levels. It is possible that in order to avoid congested areas, and any costs associated with developing in areas subject to deficiency plans, developers may prefer to initiate new projects in relatively uncongested areas. However, this factor favoring deconcentration is considered minor, when compared with existing incentives, discussed above, to locate new development in less congested areas. Moreover, the CMP project does not include a deficiency plan element or guidelines for addressing deficiencies on the CMP network. Although it is anticipated that methods to address CMP network deficiencies will be included in future updates of the CMP, it is infeasible to address the environmental effects of any such strategies at this time. Identification of deficiencies cannot take place until first year congestion monitoring is complete. Further, a wide range of deficiency mitigation strategies, with varying effects on land use, are currently under analysis in the Commission's County-Wide Congestion Study. Until this range of mitigation strategy alternatives has been fully developed and reviewed, an analysis of these strategies and an evaluation of their effect on concentration or deconcentration of land uses is premature.

(12) It has also been suggested that the CMP may have an effect in encouraging increased concentration, particularly around transportation centers and corridors. Capital improvement program improvements could potentially increase the density of trips and traffic in center areas near transportation centers, rail transit stations, park-and-ride lots, and other improvements. This is considered to be a generally positive impact, since most local jurisdictions have planning goals of increasing density in center areas.

(13) Mitigation measures A.1, A.2, A.3, A.5, C.3 and C.4 are hereby incorporated by reference herein.

3.2 Land Use.

3.2.1 Potential Effect. The CMP could involve inconsistencies with regional planning efforts.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The CMP is required by law to be consistent with the RMP prepared by SCAG. SCAG is authorized to make consistency findings with respect to the CMP. Improvement projects included in the CMP must be consistent with the RMP or SCAG may withhold them from inclusion in the Regional Transportation Improvement Program (RTIP) which is a necessary precursor to obtaining state and federal funding through the State Transportation Improvement Program (STIP). In addition, SCAG has the responsibility for evaluating the CMP model and data base to assure consistency with the regional model. The necessary mechanisms for insuring consistency between the RMP and the CMP are therefore set out in CMP legislation.

(2) The first year CMP has been developed to work toward the implementation of transportation projects and strategies recommended in the RMP. The projects included in the first year CIP are consistent with the 1989 RMP. Further, the capital improvements projects recommended for Flexible Congestion Relief (FCR) funding were found to be consistent with the RMP at the SCAG Executive Committee meeting on December 5, 1991. Also, the CMP includes a TDM Element, which is complimentary to Regulation XV of the South Coast Air Quality Management District (AQMD), and which will help to further the TDM goals of the RMP.

(3) By maintaining mobility, the CMP is expected to benefit regional air quality. The CMP includes a provision for consultation with the AQMD to insure that the CMP is developed in accordance with the region's air quality goals. Additionally, formal air quality review of CIP projects is conducted by SCAG as part of RTIP development. TDM strategies of the CMP work toward the implementation of transportation control measures; specifically, the 1992 CMP contains elements which contribute to TCM's 2.f, 2.g, 4 and H-3.

(4) The CMP is required to be consistent with the adopted regional forecast, and this forecast is also used in the development of the RMP. Since both the CMP and RMP used the adopted regional forecast, the CMP is consistent with regional growth projections.

3.2.2 Potential Effect. Should implementation of the CMP result in increased urban deconcentration or concentration or expansion of development in outlying areas, which has not been

anticipated in the regional plans, the CMP could lead to inconsistency with the Regional Air Quality Plan or the Regional Growth Management Plan, and could affect the growth and distribution of land uses, employment and population.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

- (1) The facts in support of finding 3.1.1 are incorporated by reference herein.

3.3 Transportation.

3.3.1 Potential Effect. Implementation of the CMP, and in particular the TDM Element, could cause social adjustments or traffic pattern modifications in order to engage in ride sharing or other TDM activities.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

- (1) The TDM Element and TDM model ordinance of the CMP are directed at the requirements of a facility, while AQMD's Regulation XV is directed at the performance of individual employers. In this way the CMP TDM Element acts in support of the AQMD regulation rather than adding the requirements to Regulation XV. Because Regulation XV is already in existence, any potential impacts related to social adjustments or traffic behavior to comply with ride sharing requirements are already underway, and are not associated with the CMP TDM Element. That is, the CMP TDM Element will not impose any greater disruption than has already taken place under Regulation XV.

- (2) The transit operator consultation requirement of the CMP TDM Element is anticipated to have a beneficial impact on transit services as a result of improved information on potential transit impacts being incorporated into EIRs for development projects. This additional information is expected to reduce disruption related to increases in TDM efforts.

3.3.2 Potential Effect. Should implementation of the CMP result in increased urban deconcentration, or concentration or

expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on the transportation system by increasing vehicle miles traveled.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The facts in support of finding 3.1.1 are incorporated by reference herein.

3.4 Air Quality.

3.4.1. Potential Effect. The CMP could conflict with the regional air quality management plan.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The CMP will contribute to a decrease in on-road emissions by maintaining established levels of roadway and transit service so as to minimize delays and congestion. By maintaining mobility, the CMP is expected to benefit regional air quality. The CMP includes provisions for consultation with the AQMD to ensure that the CMP is developed in accordance with the region's air quality goals.

(2) Additionally, formal air quality review of CIP projects is conducted by SCAG as part of RTIP development. TDM strategies of the CMP work toward the implementation of transportation control measures; specifically, the 1992 CMP contains elements which contribute to TCM's 2.f, 2.g, 4 and H-3.

(3) The CMP includes a TDM element which is complimentary to AQMD's Regulation XV and which will help to further the TDM goals of the RMP and AQMP.

(4) Under the provisions of state legislation, before a transportation-related project can be authorized and funded, it must be determined that the project conforms to the applicable air quality management plan. The AQMP for the South Coast Air Basin, including the County of Los Angeles, is designed to achieve the objectives of both the

federal and state Clean Air Acts by specified target dates. The AQMD and the RMP are linked regional planning documents, and the RMP is incorporated into the AQMP. The CMP is consistent with the RMP, and is thus consistent with the AQMP.

(5) Specific capital improvement projects identified in the CMP are also consistent with those included in the RMP and found by the SCAG Executive Committee to be consistent with the AQMP. Further, the SCAG Executive Committee has acknowledged the consistency of Flexible Congestion Relief projects with the RMP.

(6) Table 13 of the CMP EIR demonstrates the relationship between AQMP transportation, land use and energy conservation control measures and elements of the CMP.

3.4.1 Potential Effect. Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on air quality by increasing vehicle miles travelled.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The facts in support of Finding 3.1.1 are incorporated by reference herein.

3.5 Noise.

3.5.1. Potential Effect. Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on noise by increasing vehicle miles traveled.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The facts in support of Finding 3.1.1 are incorporated by reference herein.

3.6 Geology.

3.6.1 Potential Effect. Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas in closer proximity to active faults, which has not been anticipated in the regional plans, the CMP could have a negative effect on seismic risk.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The facts in support of Finding 3.1.1 are incorporated by reference herein.

3.7 Water Resources.

3.7.1 Potential Effect. Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on beneficial uses and on water supply.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The facts in support of Finding 3.1.1 are incorporated by reference herein.

3.8 Biological Resources.

3.8.1 Potential Effect. Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, particularly areas containing significant biological resources, which has not been anticipated in the regional plans, the CMP could have a negative effect on biological resources.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The facts in support of Finding 3.1.1 are incorporated by reference herein.

3.9 Cultural Resources.

3.9.1 Potential Effect. Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on historic, archaeological, or paleontological resources.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The facts in support of Finding 3.1.1 are incorporated by reference herein.

3.10 Public Services.

3.10.1 Potential Effect. Local government compliance with the CMP could result in the diversion of local government personnel and revenues for conducting traffic monitoring, implementing TDM responsibilities, and implementing the land use analysis responsibilities.

Findings. The Commission hereby makes findings (1) and (2).

Facts in Support of Findings. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) The CMP would have a beneficial impact on local government services as a result of mobility improvements from the improved Level of Service data providing for planning, the standardization of regional impact analysis provided through the Land Use Analysis Program and as a result of effective transportation improvements programming.

(2) Mitigation measures I.3 and I.4 are hereby incorporated by reference.

3.11 Cumulative Impacts.

3.11.1 Potential Effect. The CMP may contribute to cumulative environmental effects of transportation improvements planned for the Los Angeles region in areas such as mobility, air quality, energy, geology and seismicity, water resources, cultural

resources, social impacts, urban form and growth, and the regional economy.

Finding. The Commission hereby makes finding (1).

Facts in Support of Finding. The following facts or mitigation measures indicate that this potential environmental effect is not significant, or will be mitigated below a level of significance.

(1) Cumulative impacts of development and transportation systems improvements in the region are described in the Regional Mobility Plan, the Air Quality Management Plan, and the general plans of the 89 local jurisdictions in the County. Table 35 in the CMP EIR summarizes the projections of cumulative development contained in the RMP and GMP EIRs which evaluate potential impacts of growth and transportation projects by the year 2010.

(2) Environmental effects of transportation improvements planned for the Los Angeles region, within the context of regional growth and development, are analyzed in the RMP EIR. As the CMP implements portions of the RMP, cumulative impacts of the CMP will be similar to those of the RMP discussed in the RMP EIR.

(3) Cumulative transportation improvements would have a beneficial effect on mobility and access by maintaining mobility in an environment of continuing population and economic growth.

(4) TDM, TSM, growth management and AQMP TCMS, will reduce the air quality impacts of cumulative growth and traffic.

(5) Increased energy consumption will result from growth and increased travel. RMP gasoline consumption in the year 2010 would exceed 1984 levels. However, with implementation of mitigation measures identified in the regional growth plans (RMP, GMP, and AQMP) and their supporting EIRs, there would be a cumulative beneficial impact on energy in the region.

(6) Construction of additional structures in areas of geologic hazards, including faults zones, liquefaction, landslide and subsidence areas will result in increased risks. This is not considered a significant adverse cumulative impact, due to mitigation measures and standard engineering practices.

(7) Several of the regional projects may change flow patterns of water resources, increase run-off, and reduce run-off water quality. This is not considered a significant cumulative adverse impact with implementation of mitigation measures identified in the regional growth plans and supporting EIRs.

(8) Construction of new facilities without proper safeguards could result in destruction of cultural or scientific resources. However, this is not considered a significant cumulative adverse impact with implementation of mitigation measures identified in the regional plans and supporting EIRs.

(9) Regional transportation improvements will improve access to and ties between communities of the region. Transit measures will improve access to transportation facilities for the growing transit dependent population. These impacts are considered beneficial.

(10) The RMP and cumulative transportation improvements in the region are expected to accommodate planned growth and incorporate measures to improve the jobs/housing balance of the region. This is considered a beneficial effect.

(11) Regional transportation improvements will provide access to employment centers, facilitate goods movements and stimulate local economies.

4.0 FINDINGS REGARDING ALTERNATIVES.

Environmental documentation for the CMP, including the development and review of alternatives, has taken place in the context of development of the RMP adopted in 1989 by SCAG. The environmental documentation for the CMP has been carried out as a tiered process, as authorized by CEQA and the CEQA Guidelines (Pub. Resources Code, § 21093; CEQA Guidelines, § 15152). The tiered environmental review process is designed to focus environmental analysis on those issues ripe for decision at each point in the planning process.

Further, because the CMP is a regional transportation planning document, which has been developed in contemplation of regional transportation and air quality planning efforts, transportation system development alternatives considered at the regional level, as in the RMP, are relevant to consideration of the feasibility of alternatives to the CMP.

This section presents findings regarding alternatives to the

CMP. It includes findings regarding Capital Intensive and TDM Intensive Alternatives, within the context of the approved regional transportation planning contained in the RMP. This section also presents findings regarding the potential environmental effects of the "No Project" or "No Build" alternatives..

4.1 Overview of Standards for Determining a Reasonable Range of Alternatives.

CEQA requires that EIRs examine feasible mitigation measures and feasible alternatives to a proposed project. A critical element of an EIR is the selection of which alternatives warrant detailed review in the document.

In any environmental review, the lead agency must determine the range of alternatives to be examined. As the California Supreme Court has found, "both the California and the federal courts have . . . declared that the 'statutory requirements for consideration of alternatives must be judged against the rule of reason.'" The court further noted that "these statutory and judicial concepts are carried forward in the [CEQA] Guidelines":

[An EIR] must describe a range of reasonable alternatives to the project or the location of the project, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives. (CEQA Guidelines, § 15126, subd. (d).)

It is important to note that the range of alternatives is defined by those alternatives "which could feasibly attain the basic objectives of the project . . ." (Emphasis added.) Accordingly, in determining the scope of the alternatives analysis and of the reasonable range of alternatives, the alternatives analysis in the CMP EIR was framed by the project objectives and purposes identified for the CMP in the course of its planning history and in relation to the regional planning framework provided by the RMP.

Not only must a range of alternatives reflect those alternatives capable of attaining the basic objectives of the project, but the alternatives must also comprise actions that can feasibly be implemented. Recently, the California Supreme Court has noted that "in determining the nature and scope of alternatives to be examined in an EIR, local agencies shall be guided by the doctrine of feasibility." As defined in CEQA, the term "feasibility" involves an assessment of whether the mitigation measures and alternatives are "capable of being

accomplished in a successful manner within a reasonable period of time, taking into account economic, social and technological factors." The feasibility of alternatives to the CMP is limited both by the existing regional planning framework for transportation set forth in the RMP, and by the requirements of the CMP statute.

4.2 Regional Mobility Plan Alternatives Analysis.

4.2.1 CMP Consistency With RMP Analysis.

Since the CMP statute requires the CMP to be consistent with the RMP, the CMP alternatives must also be consistent with the adopted RMP. Therefore, the proposed CMP and the range of alternatives provided by the TDM and Capital Intensive Alternatives can be feasible only to the extent that they are consistent with the RMP. The project and the alternatives are tiered from the adopted RMP, while the environmental analysis is tiered from the RMP EIR. Alternatives beyond the scope of the adopted RMP are infeasible, since the CMP must, by statute, be consistent with the RMP. It would be infeasible to prepare alternatives which are inconsistent with the RMP.

The proposed CMP and the Capital Intensive and TDM Intensive Alternatives have been designed to be consistent with the adopted RMP strategy. Program alternatives which were not consistent with the adopted RMP have been excluded from the CMP alternative analysis since they do not meet the CMP statute's RMP consistency requirements and since they generally were determined to represent an inferior strategy based on the previous RMP analysis.

4.2.2 RMP Alternatives

In adopting the RMP, SCAG analyzed five alternatives. These alternatives are briefly described below, and their impacts are described in detail and compared in Table 26 of the CMP EIR. The RMP analysis is incorporated by reference into the CMP EIR and these findings.

- RMP Alternative 1 -- The No Project Alternative. The RMP no project alternative consisted of the 1987 existing transportation system and construction of the transportation system improvements funded as of 1987.
- RMP Alternative 2 -- Facility Intensive Response to Growth Trends. This alternative consisted of the construction of 7,660 lane-miles of freeway improvements region wide, compared to the construction of 3,097 miles of mixed flow and HOV lane miles

included in the RMP. It included a comparable level of transit corridor development to the RMP (367 miles versus the RMP's 360 miles). This alternative included a much lower of TDM effort than the adopted RMP.

- RMP Alternative 3 -- Facility Intensive Emphasis With Balanced Growth. This alternative consisted of construction of 6,043 lane-miles of freeway improvements region wide, compared with the construction of 3,097 miles of mixed flow and HOV lane miles under the RMP. It included slightly less transit corridor development than RMP Alternative 2. Like RMP Alternative 2, it included a lower level of TDM effort than the RMP.
- RMP Alternative 4 -- Demand Management Emphasis With Balanced Growth. This alternative included a much lower level of freeway improvement construction region wide than the RMP (1,858 lane-miles compared to 3,097 for the RMP). It included job/housing balance strategies coupled with the same TDM requirements as the RMP and a similar level of transit corridor development.
- RMP Alternative 5 -- Demand Management Response to Growth Trends. Unlike RMP Alternative 4, this alternative did not include a job/housing balance strategy. It included construction of less freeway improvements than the RMP (2,766 lane-miles compared to the RMP's 3,097 lane-miles), but more transit corridor development.

As described in detail in the RMP and RMP EIR, these alternatives were infeasible or not environmentally superior to the adopted RMP approach. As described above, the CMP analysis is tiered from the RMP alternatives analysis and, therefore, does not involve a detailed reevaluation of the alternatives considered in the RMP.

4.3 CMP Alternatives.

4.3.1 No Project (Existing System). This no project alternative presumes that no changes are made to existing transportation systems, and that the existing systems must accommodate projected future travel demand.

The No Project (Existing System) Alternative is infeasible or not environmentally preferable for the following reasons:

- (1) As discussed in detail in the RMP EIR, congestion

on the highway and arterial system would degrade to level of service F on most of the system, peak period average vehicle speed would significantly decrease, and as a result, peak period travel would lengthen as people increasingly attempt to avoid congestion. Because the CMP is consistent with the RMP, the evaluation of the RMP No Project Alternative also represents the potential impacts of maintaining existing conditions in the absence of the CMP.

(2) This alternative would be inconsistent with the Growth Management Plan, Regional Mobility Plan, and the Air Quality Management Plan, since funding for project currently proposed in the RMP to meet regional mobility and air quality goals would not be built. Failure to achieve the RMP levels could potentially lead to a land use future which is different than the SCAG regional forecast. This is particularly true if Los Angeles County is the only one of the SCAG counties to fail to adopt a CMP. This alternative would, therefore, have a significant adverse impact on land use.

(3) Congestion on the regional system would degrade to level of service F on most of the system, creating a potentially deficient County-wide system. As a result, County-wide mobility would be extremely limited. This would result in a significant negative impact on the regional transportation system. The resulting impacts would be similar to those of RMP Alternative 1: Congestion would increase, transit ridership would drop and on-road fuel consumption would increase significantly.

(4) Under this alternative no CMP actions would be taken which would improve the region's air quality. In addition, those Los Angeles County RMP projects with the potential to improve air quality would not be realized, and facilities based TDM ordinances would not be adopted County-wide by local jurisdictions. Increased congestion on the County's regional system would lead to increased levels of air pollution, as compared to levels obtained with full implementation of the capital projects included in RMP. This could significantly impact the air basin's ability to comply with Clean Air legislation.

(5) Increased congestion could potentially lead to decreased noise on the regional network and increased traffic on surface streets. No additional highway sound walls would be built. The potential net result would be increased noise levels in residential neighborhoods and a continued lack of noise mitigation for residential uses located near highways in the County.

(6) Under this alternative, there would be no geological impacts associated with the construction of CMP projects or further impacts associated with RMP construction projects. This alternative could increase or decrease the potential exposure of regional residents to seismic hazards. The change in exposure would depend on the nature of the population redistribution which would result from increased congestion on the County's transportation network.

(7) Under this alternative, there would be no water resource impacts associated with the construction of CIP projects or further impacts associated with RMP construction projects. Water quality impacts from automobile sources could result in additional water quality impacts. Increased congestion on the existing system would increase pollutant loading adjacent to existing facilities; without retrofitting of existing facilities, increased pollutants would not be mitigated by water quality related measures of new projects. This alternative could increase or decrease the potential impacts on beneficial uses in the region. The change in exposure would depend on the nature of the population redistribution which would result from increased congestion on the County's transportation network.

(8) Under this alternative, potential biological resource impacts associated with the construction of CMP projects or further construction of RMP projects would not occur. However, biological resource impacts could potentially result from a redistribution of the region's population engendered by the greater levels of traffic congestion, noise and air pollution which would occur in the County under this alternative.

(9) There would be a reduced potential for cultural resource impacts associated with the construction of CMP projects. However, cultural resource impacts could occur as a result of the potential redistribution of the region's population in response to increased congestion in the urbanized portion of the Los Angeles region. To the degree that increased congestion leads to development of previously undeveloped portions of the region, increased cultural resource impacts could result.

(10) Under this alternative, travel speeds on the regional network would further degrade, further increasing the response time of fire and police services. To the degree that increased congestion reduces the attractiveness of Los Angeles County cities as a potential location for population and employment, the tax base of the area could be eroded.

(11) This alternative would not comply with the requirements of the CMP statute since it does not include the definition of a CMP transportation system, the definition of LOS standards, a TDM element, a land use analysis program, a seven-year capital improvement program, or the adoption of a CMP. This alternative would fail to respond to anticipated growth in the region, and it is thus not considered feasible.

4.3.2 No Project (No CMP, No Future State Funding).

Under this alternative, the CMP would not be adopted. This would directly result in the loss of future Flexible Congestion Relief and Traffic Systems Management funding. In addition, federal congestion management requirements now tied to transportation funding would likely not be met, resulting in the loss of those funds as well. The effect of losing those funding sources would be to substantially delay the delivery of transportation capital improvements throughout the County. Other components of the CMP, in addition to the capital improvement program element, would not be implemented. These would include the highway and transit level of service standards, network monitoring, TDM ordinance and the land use analysis program. Local land use decisions would continue to be made with varying attention to regional transportation impacts and without the benefit of the additional data which would be generated through a CMP monitoring program. The method used to perform land use impact evaluations would continue to vary by jurisdiction. Any transportation demand management ordinances and policies adopted individually by each jurisdiction would lack a common baseline and there would be no County-wide baseline.

This alternative differs from the no project alternative described in Section 4.3.1, which compared the CMP to the existing system currently available to County residents. This second no project alternative assumes that improvement to the transportation system will continue to occur, but will be significantly hampered by the funding restrictions imposed by failure to adopt a CMP.

The No Project (No CMP, No Future State Funding) alternative is infeasible or not environmentally preferable for the following reasons:

(1) In approving the CMP statute, the California Legislature cited fragmented planning among jurisdictions and among modes, which each day results in 400,000 hours lost in traffic, 200 tons of air pollutants, and \$3,100,000 in added costs state-wide to the motoring public. Under this alternative, Los Angeles County would contribute to

fragmented planning. This alternative would have significant deconcentrating impacts, since development would likely locate on the County's periphery and in adjacent counties where congestion was less. Increased congestion of the system could lead to either increased density in employment areas, or an out migration of population and jobs to nearby counties.

(2) Under this alternative, construction of needed transportation improvements would be delayed and the model TDM ordinance would not be adopted by local jurisdictions. This would result in increased congestion on the highway system and less transit availability than with the CMP. This alternative would not help to fulfill the aims of the RMP and would be inconsistent with that document.

(3) Delay in the implementation of transportation measures designed to help implement the AQMP would result in delays in the region's compliance with Clean Air Act standards and could result in non-attainment penalties.

(4) This alternative would result in delays in the construction of sound walls along highways and increased traffic related noise generation. This would both prolong and increase the exposure of sensitive uses to transportation related noise.

(5) This alternative would have greater operational water quality impacts than the CMP.

(6) Biological resource impacts could potentially result from a redistribution of the region's population to less developed areas with intact habitats, engendered by the greater levels of traffic congestion, noise and air pollution which would occur in the County under this alternative. Biological resource impacts associated with construction of improvement projects would generally be similar to those of the proposed CMP; construction of facilities could result in the destruction of habitat.

(7) There would be a reduced potential for cultural resource impacts associated with the construction of transportation facilities under this alternative than under the proposed CMP. However, cultural resource impacts could occur as a result of the potential redistribution of the region's population in response to increased congestion in the urbanized portion of the Los Angeles region. To the degree that increased congestion leads to development in previously undeveloped portions of the region, increased culture resource impacts could result.

(8) Impacts would be generally as described in Section 4.3.1; however, they would occur somewhat later, and be somewhat less severe since funding would not be lost until the next funding cycle.

(9) This alternative would not comply with the requirements of the CMP statute since it does not include the definition of a CMP transportation system, the definition of LOS standards, a TDM element, a land use analysis program, a seven-year capital improvement program, or the adoption of a CMP. This alternative would fail to fulfill the aims of the RMP and would be inconsistent with that document; it is therefore considered not feasible.

4.3.3 TDM Intensive Alternative.

This alternative would be based on an intensive performance-based TDM program approach to congestion management. The program would be aimed at achieving the regional mobility plan's TDM goal of a 30% reduction in auto-based home-to-work trips. Expanding the TDM portion of the CMP effort would reduce the capital improvement projects within the program. CMP LOS standards, networks, and land use analysis program would be the same as for the proposed CMP.

The TDM Intensive Alternative is infeasible or not environmentally preferable for the following reasons:

(1) The intensive TDM program would be consistent with long-range RMP TDM goals. However, the alternative as a whole would be inconsistent with the RMP since it would not include the balance of capital improvement projects and modal strategies assumed in the RMP and, therefore, would not achieve mobility goals. Implementation of this alternative would result in minimal capital improvements in the Los Angeles region. There is also great uncertainty regarding the actions required to achieve these TDM goals. Stringent controls on new development (such as mandatory trip reductions as a condition of approval) could deter such development, and preclude the creation of transit-beneficial land uses and densities. Certain TDM measure, such as market pricing mechanisms, could also have activity relocation/deconcentration effects.

(2) The RMP TDM program includes a major ride share program, a telework center program, and a flex-time work program that is projected by SCAG to result in a 30 percent reduction in home-to-work trips and a 22.4 percent carpool/vanpool share by 2010. The RMP EIR also projects a 19.4 percent mode share by transit for all home-to-work

trips by 2010. However, there is a potential for population and employment redistribution, should the Los Angeles region be the only county in the region to adopt stricter TDM requirements.

(3) Increased TDM should have a beneficial impact on the network by reducing drive-alone auto trips and increasing ridesharing and transit use. However, without implementation of all of the capital improvement projects included in the RMP, congestion on the transportation system would continue to degrade. Implementation of this degree of TDM would not be sufficient to maintain mobility or LOS standards. Overall, this alternative would have a negative impact on the transportation system, compared to the proposed CMP.

(4) This alternative would be inconsistent with the RMP and thus with the AQMP. It would thus result in negative air quality impacts compared to the proposed CMP due to increased trip distances and related emissions. Capital projects anticipated in the air plan would also not be implemented, exacerbating emissions due to traffic congestion.

(5) This alternative would result in less direct biological resource impacts. The degree and nature of indirect impacts would depend on the land use consequences of failing to maintain levels of service in the County.

(6) This alternative would result in less direct cultural resource impacts. The degree and nature of indirect impacts would depend on the land use consequences of failing to maintain levels of service in the County.

(7) Since this alternative would not result in the maintenance of levels of service on the highway network, policy and fire response times would continue to degrade.

(8) This alternative is considered inferior to the proposed CMP since: (1) it would not include the balance of capital improvement projects included in the RMP and would therefore not achieve RMP mobility goals; (2) there is great uncertainty regarding the actions required to achieve this level of TDM; (3) stringent controls on new development could deter such development and preclude the creation of transportation beneficial land uses and densities; (4) congestion on the transportation system would continue to degrade under this alternative; and (5) this alternative would have negative air quality impacts when compared to the proposed CMP.

4.3.4 Capital Intensive Alternative.

Under this alternative a capital intensive approach to maintaining mobility would be used for congestion management. This alternative proposes to accelerate much of the capital component of the 20 year Regional Mobility Plan into the 7 year capital improvements program. This component would include no additional TDM efforts above existing levels. The network, LOS and land use analysis components would be the same as for the proposed CMP.

The Capital Intensive Alternative is infeasible or not environmentally preferable for the following reasons:

(1) This alternative would have the same potential to create sprawl and increase density near transit centers as the proposed CMP, without the trip-reduction effects of a strong TDM component. Increased capital projects would require additional right-of-way with greater need to displace existing land uses.

(2) This alternative would have environmental effects similar to those of two of the alternatives to the RMP described above, Alternative 2 - the Facility-Intensive Response to Growth Trends and Alternative 3 - the Facility-Intensive Emphasis with Balanced Growth. Both RMP alternatives would result in additional highway system improvements that would lead to improved system performance on a regional level. Both would have negative local impacts. However, these improvements have related increases in capital costs which cannot be overcome by switching TDM dollars to capital projects. The subsequent imbalance of TDM and capital projects will result in an inability to maintain CMP LOS standards.

(3) This alternative is not consistent with the RMP and AQMP since this alternative does not contain an appropriate balance of TCMs that have been found necessary to attain air quality goals.

(4) More capital projects would create greater potential for construction related noise, geology, water resources, biological resources, and cultural resources impacts.

(5) This alternative is considered inferior to the proposed project because: (1) this alternative would result in increased capital costs beyond existing sources; (2) the imbalance between TDM and capital projects inherent in this approach would fall short in attaining CMP LOS standards;

(3) this alternative would not be found consistent with the RMP and AQMP since this alternative does not contain an appropriate balance of TCM's that have been found necessary to attain air quality goals and (4) there is a greater potential for CIP related noise, geology, water resource, biological resource, and cultural resource related impacts.

5.0 STATEMENT OF OVERRIDING CONSIDERATIONS.

The CMP EIR indicates that if the CMP is adopted, certain significant effects may be unavoidable. However, if the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." The Commission finds the unavoidable significant effects described in section 2.0 are acceptable, and alternatives with less significant environmental impacts are not preferable, as described in section 4.0, due to the following overriding considerations.

5.1 Economic Effect of a Balanced Transportation System.

The CMP will contribute to a balanced transportation system in the County. The existence of a balanced and efficient regional transportation system is necessary to the development and maintenance of a healthy economic climate. The California Legislature, in adopting the CMP statute, found that "although California's economy is critically dependent upon transportation, its current transportation system relies primarily upon a street and highway system designed to accommodate far fewer vehicles than are currently using the system. . . . The lack of an integrated system and the increase in the number of vehicles are causing traffic congestion that each day results in 400,000 hours lost in traffic, 200 tons of pollutants released into the air and three million one hundred thousand dollars (\$3,100,000) added costs to the motoring public." The Legislature declared its intention that to develop California's economy to its fullest potential federal, state and local agencies should join with transit districts, business, private and environmental interests to develop and implement comprehensive strategies to meet transportation needs.

5.2 Consistency with Comprehensive Regional Transportation Planning.

As described in detail in the CMP EIR, and the RMP and RMP EIR, region wide transportation planning has focused on the development of a balanced system of capital improvements, balance between jobs and housing, and transportation demand management and transportation systems management measures. This regional approach is necessary to address the tremendous transportation

needs of Los Angeles County and the Southern California region. In adopting the CMP statute, the California Legislature found that California's transportation system is characterized by fragmented planning, both among jurisdictions involved and among the available means of transport, and further found that to keep California moving, all methods and means of transport between major destinations must be coordinated to connect vital economic and population centers.

The CMP is designed to provide an essential coordinating mechanism within Los Angeles County and to provide planning linkages with other counties to assure an integrated transportation system. To assure consistency and integration between levels of transportation planning, the CMP is consistent with the provisions of the RMP, as required by the CMP statute.

5.3 Transportation Demand.

As described in detail in the CMP EIR, it is estimated that the six county regional transportation system governed by the RMP supports travel demands of approximately 243,339,000 daily vehicle miles of travel (VMT) and 7,454,000 daily vehicle hours of travel. Travelers experience an estimated 1,136,000 hours of delay per day, representing 15% of the total vehicle hours of travel. Average daily speeds are estimated at 33 miles per hour on all facilities and 43 mph on freeways. Home to work transit ridership totals 482,000 trips per day which represents approximately 6% of the total daily home to work trips.

Within the six county RMP region, Los Angeles County is the most urbanized and largest county with a population of over 8,000,000 persons in 1990 and expected to approach 10,000,000 by the year 2010. As described in detail in the RMP and RMP EIR, without significant improvements in the regional transportation system, congestion is expected to increase dramatically. Table 8 in the CMP EIR indicates that without the RMP planned improvements, virtually all mobility performance indicators will suffer substantial decline in the 20-year horizon of the RMP. The CMP is consistent with, and implements the provisions of the RMP at a county-wide level. In the absence of the CMP, it will be impossible to attain the mobility improvements called for in the RMP, and increasing congestion and decreasing mobility would be expected to lead to significant economic effects, including economic losses due to travel delay, and out migration of jobs.

5.4 Emergency Access and Evacuation.

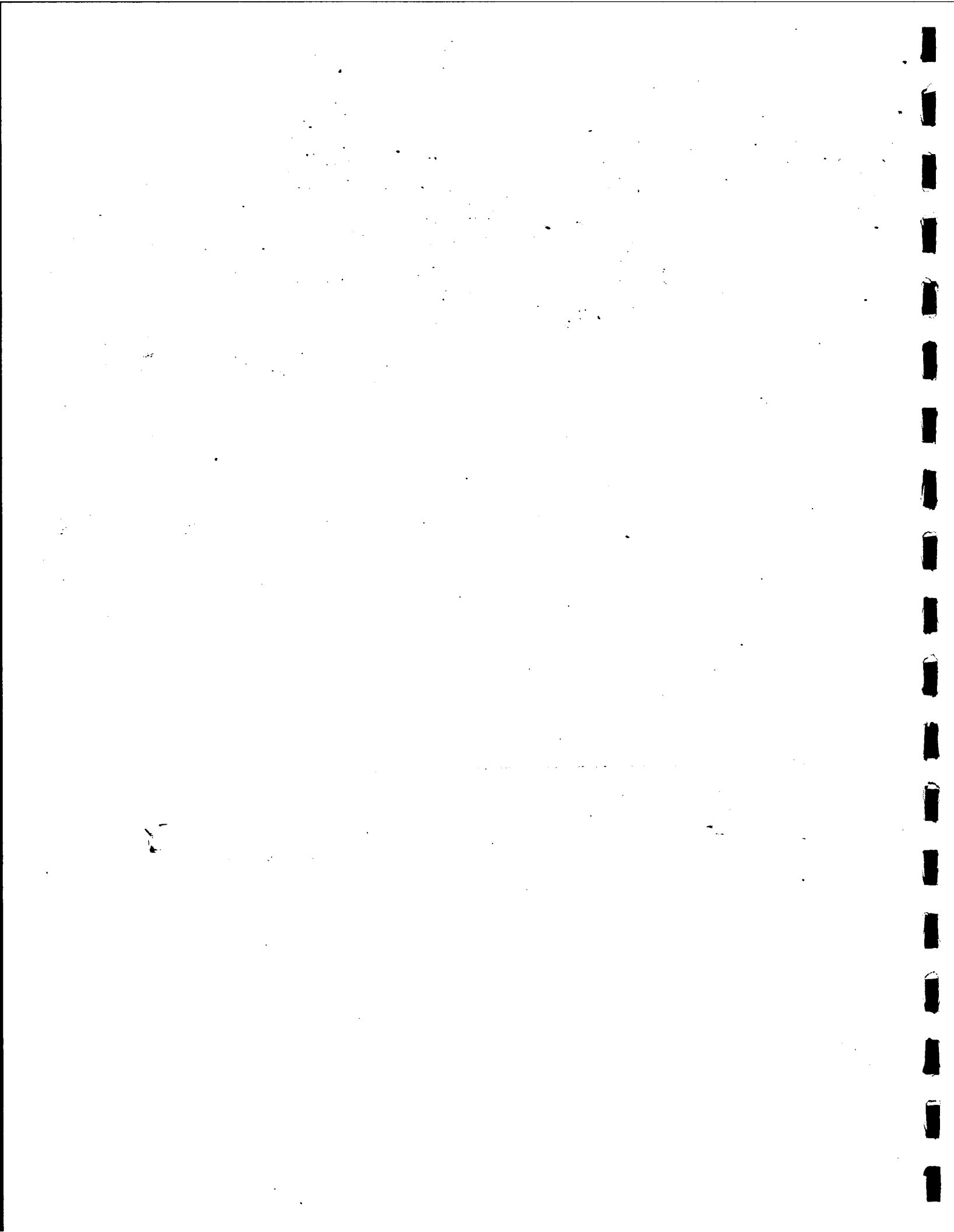
The effect of the CMP in maintaining regional mobility and maintaining or improving Levels of Service on the highway network, will be essential to maintaining access for emergency

services to all portions of the County. In the event of an emergency, such as an earthquake, or renewed periods of social unrest, it is vital that the transportation system have sufficient capacity and potential alternative routes and modes to handle large volumes of evacuation traffic in a short period of time. The importance of alternative routes was highlighted after the recent earthquake in the San Francisco Bay area when parallel systems and modes were able to provide emergency access and evacuation capacity when some major highway systems had been damaged. The CMP will maintain or improve access to emergency sites for law enforcement, fire and medical vehicles.

5.5 Environmental Superiority.

The CMP would be environmentally superior to the alternatives evaluated in the CMP EIR. Neither of the no project alternatives is consistent with the requirements of the CMP statute. Further, the no project alternatives fail to address the congestion problems in the County. As a result, the no project alternatives will result in significant environmental effects on transportation, land use and air quality, which would be avoided by the proposed CMP Project.

The TDM Intensive Alternative is environmentally superior to the other alternatives, avoiding the potentially increased level of project-level impacts associated with the Capital Intensive Alternative. However, the TDM Intensive Alternative would result in more land use, transportation, air quality and public service impacts than the proposed CMP. Further, the TDM Intensive Alternative is infeasible because it fails to meet the regional mobility and air quality goals of the CMP Project.

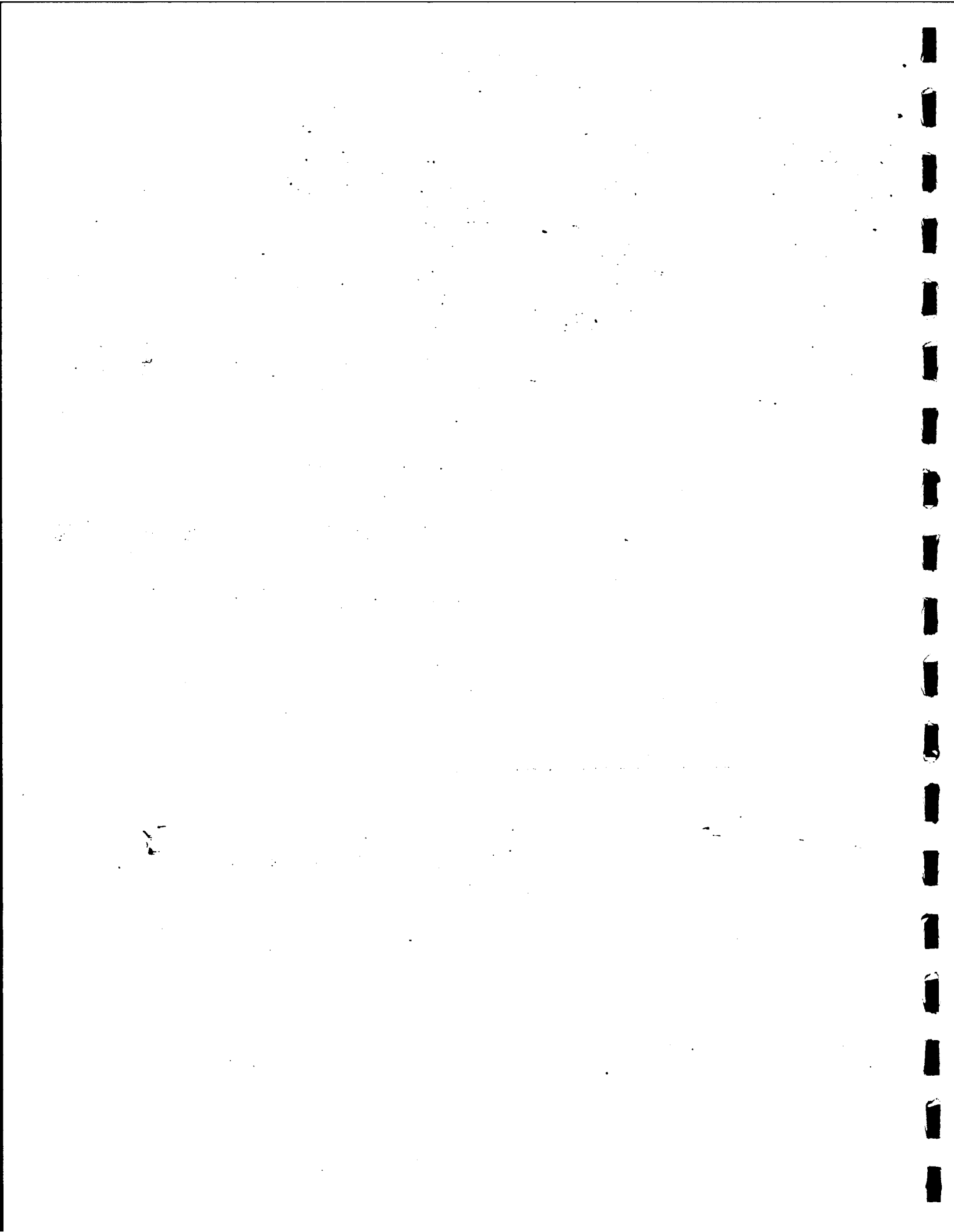


Los Angeles County Transportation Commission

**Congestion Management Program
Environmental Impact Report**

Mitigation Monitoring Program





**MITIGATION MONITORING PROGRAM
FOR THE CONGESTION MANAGEMENT PROGRAM**

1. Program Purpose:

The purpose of the Mitigation Monitoring Program (MMP) is: (1) to provide monitoring and reporting on, according to Public Resources Code 21081.6, implementation of mitigation measures adopted as part of the certification of the Environmental Impact Report for the Los Angeles County Congestion Management Program (CMP) and; (2) to identify the responsibilities of the LACTC for carrying out mitigation measures for the CMP adopted by LACTC.

2. Program Scope:

As required by Public Resources Code Section 21081.6, this Program provides for monitoring and reporting with regard to CMP mitigation measures adopted by LACTC.

3. Program Implementation:

LACTC is responsible for implementing and monitoring implementation of the mitigation measures contained in the certified CMP EIR and contained in this MMP. Monitoring responsibility is assigned to each mitigation measure in the attached table.

4. Program Reporting:

A report outlining the status and progress toward mitigation measure implementation shall be prepared biennially, concurrent with the update of the Congestion Management Program. The first report shall be prepared in conjunction with the 1993 CMP Update and shall be filed with the MTA Board prior to adoption of the 1993 CMP Update. The report shall contain the following information:

A. CMP CIP Mitigation Measures:

- 1. The total number of EIR's reviewed for CMP CIP projects. The report shall also indicate the lead agency for the project, the jurisdiction in which the project is located, and a brief description of the project.**

2. A summary of the process utilized by LACTC in the review of CMP CIP EIR's.
3. A summary of the mitigation strategies adopted by the Lead Agency and incorporated in the project's Final EIR, as they relate to the CMP CIP mitigation measures identified in this Mitigation Monitoring Program.

B. CMP Program Mitigation Measures:

The Status and progress made toward implementation of the mitigation measures A.1, A.2, A.3, A.5, C.2, C.3, C.4, G.2, I.2, I.3 and I.4. Where appropriate, the report shall describe specific activities and accomplishments related to implementation of these mitigation measures.

5. Program Responsibility:

It shall be the responsibility of the Congestion Management Program Administrator to ensure that the mitigation measures contained within this Program are implemented. It shall also be the responsibility of the Congestion Management Program Administrator to ensure that the biennial report required by Section (4) above, shall be prepared.

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
LAND USE			
<p>Direct Impact: Individual CMP projects may result in localized changes in land use.</p> <p>Indirect Impacts: Should implementation of the CMP result in increased urban deconcentration or concentration or expansion development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on land use.</p> <p>Increasing system capacity may encourage additional trips (latent demand) on the system, by reducing the costs (time and stress) associated with trip-making.</p>	<p>A.1 LACTC shall consult with other adjacent CMAs in reviewing LOS standards to ensure that differences in LOS standards between counties do not encourage a land use pattern which is inconsistent with local land use or regional goals.</p> <p>A.2 LACTC shall participate in on-going forums, regarding inter-jurisdictional impacts including land use issues and impact analysis procedures.</p> <p>A.3 LACTC shall investigate the use of other mobility and system performance indices such as Vehicle Ridership and shall compare the effectiveness of such indices with LOS as standards for determining both system mobility and motor vehicle emissions performance. These supplemental measures shall be incorporated into the program if determined to be effective for reconciling localized decreases in service against regional improvements.</p>	<p>LACTC</p> <p>LACTC</p> <p>LACTC</p>	<p>A) LACTC B) Biennial Report</p> <p>A) LACTC B) Biennial Report</p> <p>A) LACTC B) Biennial Report</p>

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Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
<p>Direct Impacts: The following classes of CMP CIP projects could lead to the localized displacement of adjacent businesses and residences: Class 1 - freeway system management (specifically the construction of HOV lanes); Class 2 - freeway gap closures; Class 6 - rail improvements; Class 4 - commuter rail stations; transit centers and park-n-ride lots; and, to a more limited degree, Class 3 - arterial system improvements. Of the 1992 CIP projects Class 2 and 3 projects present the greatest potential for disruption.</p> <p>The CMP's Land Use Analysis Program, in combination with CMP network monitoring and modeling should provide better information which local jurisdictions can base their analysis.</p> <p>Indirect Impacts: The CMP's TDM component may result in increased density in the vicinity of transit centers and rail facilities. This would be supportive of the centers development goals of a number of local jurisdictions.</p>	<p>A.4 LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the land use impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations.</p> <p>None required.</p> <p>A.5 LACTC shall explore with the cities the desirability of including mechanisms in the CMP for encouraging the creation of increased density in targeted centers areas. Possible mechanisms include specification of density related CIP project selection criteria; inclusion of density encouraging mechanisms in the TDM component of the CMP; or inclusion of mechanisms to encourage targeted density development as a component of future deficiency planning.</p>	<p>LACTC</p> <p>—</p> <p>LACTC</p>	<p>A) LACTC B) Biennial Report</p> <p>—</p> <p>A) LACTC B) Biennial Report</p>

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Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
TRANSPORTATION			
<p>Direct Impact: The CMP has been designed to be consistent with the RMP, thus the CMP should have a positive impact on working towards attainment of Regional Mobility goals.</p> <p>Direct Impact: Any potential impacts of the highway and roadway element of the CMP are likely to be related to the implementation of the specific CIP improvement projects within the framework of the CMP process. CIP projects will help to maintain LOS.</p> <p>Traffic may be re-routed during the construction of a particular facility. It is possible that the implementation of a transportation improvement project may cause traffic to be diverted into or through sensitive areas including residential neighborhoods, creating localized noise or air quality impacts.</p> <p>Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on the transportation system by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.</p> <p>Direct Impact: The Highway and Transit Elements would provide monitoring information to assist in planning.</p>	<p>None Required</p> <p>Mitigation measure A.4 would mitigate the direct effects of the CIP element of the CMP.</p> <p>B.1 LACTC shall review EIR's for CIP projects to ensure that mitigation measures are included requiring that the Lead Agency give transit operators and affected City Departments of Transportation advanced notice of construction activities which might impact the transportation system.</p> <p>Mitigation Measures A.1 - A.3 would mitigate the indirect effects of the CIP element of the CIP; mitigation measures A.1 A.3 and mitigation B.1 would mitigate the indirect effects of the CMP Highway and Roadway System element.</p> <p>None Required</p>	<p>LACTC</p>	<p>A) LACTC B) Biennial Report</p>

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Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
AIR QUALITY			
<p>Direct Impact: The CMP conforms with the AQMP and would help to improve regional air quality in the County.</p>	<p>None Required</p>	<p>—</p>	<p>—</p>
<p>Direct Impact: The construction and/or operation of CIP transportation improvement projects could have the following localized negative air quality impacts adjacent to the improvement alignment of right-of-way:</p> <ul style="list-style-type: none"> • Construction of roadway and/or transit improvements would have short-term construction impacts. Earth moving activities would increase localized particulate levels. Improvements to existing roadways may also require detours and delays during construction which would cause short-term increases in emissions. • New route locations or freeway gap closures have the potential to bring mobile emission sources closer to existing sensitive land uses as well as create new line sources of pollutant emissions in areas where such sources may not have existed before. • Providing increased roadway capacity by widening or re-striping may move vehicle travel lanes closer to sensitive land uses adjacent to the roadway. 	<p>In addition to mitigation measure B.1, the following mitigation measures would partially mitigate direct impacts associated with CMP CIP projects:</p> <p>C.1 LACTC shall review project-level EIR's for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the air quality impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • preparation in accordance with applicable guidelines (SCAQMD, CALTRANS, FHWA, EPA etc.); • both construction and operation phase emissions and criteria pollutant concentrations, and compare emissions and concentrations to established SCAQMD daily emissions thresholds, as well as to California Ambient Air Quality Standards (CAAQS); • consistency with the Air Quality Management Plan; 	<p>LACTC</p>	<p>A) LACTC B) Biennial Report</p>

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
<p>Creation of rail transit stations and transit centers has the potential to attract a significant number of vehicles to parking locations. Particularly during peak periods, localized carbon monoxide "hot spots" may be created by vehicles idling or queuing at access points to parking facilities. Station circulation may also impede vehicle flow on adjacent arterial streets and this increase delays, idling and localized emissions.</p> <p>Indirect Effects: Should implementation of the CMI result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on air quality by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.</p> <p>CMP-related improvements could potentially increase the density of trips and traffic in center areas such as near transportation centers, rail transit stations, part and ride lots, etc. In these cases, the air quality affect of the CMP could create "hot spots" of pollutant concentrations, particularly carbon monoxide.</p>	<ul style="list-style-type: none"> • demonstration that significant air quality impacts have been mitigated in a manner consistent with the provisions of applicable State and Federal clean air legislation. <p>C.2. LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(1) of the Street and Highways Code for highway landscaping and urban forestry projects designed to offset vehicular emissions of carbon dioxide associated with CIP projects.</p> <p>C.3. LACTC, where possible, through the congestion monitoring, highway and transit network modeling and land use analysis program elements of the CMP, shall determine the similarity between observed travel behavior with growth rates and geographic distribution assumptions of the RMP. The success of the program in working toward regional land use and mobility goals will be assessed as part of future CMP updates, and appropriate changes to work toward regional goals will be proposed in consultation with local, regional, and state agencies.</p> <p>C.4. LACTC shall encourage and participate in the evaluation and reconciliation of localized adverse impacts with regional improvements. Such evaluation is intended to broaden the understanding of "hot spots" of pollutant emissions, and the tradeoffs between hot spot creation and regional emission reductions.</p>	<p>LACTC</p> <p>LACTC</p> <p>LACTC</p>	<p>A) LACTC B) Biennial Report</p> <p>A) LACTC B) Biennial Report</p> <p>A) LACTC B) Biennial Report</p>

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
NOISE			
<p>Noise from the construction of CIP projects may be disruptive. Circumstances where noise conditions may increase and adverse impacts may result including the following:</p> <ul style="list-style-type: none"> - Construction of new routes or freeway gap closures through sensitive residential areas. - Widening of facilities on the existing CMP highway network that would bring travel lanes and mobile noise sources closer to sensitive adjacent land use receptors. - Construction of elevated HOV lanes or elevated rail transit within or adjacent to facilities passing through residential areas or adjacent to sensitive land uses. <p>Operational improvements on the CMP network that would increase traffic speed and flow that may incrementally increase noise levels.</p> <p>Increase in the frequency of transit service (bus and/or rail) would increase Community Noise Equivalent Levels (CNEL).</p> <p>New transit alignments or the construction of new elevated transit facilities would increase ambient noise levels.</p> <p>New transit stations may cause an increase in mobile and stationary levels for adjacent land uses.</p>	<p>D.1 LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the noise impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • preparation in accordance with applicable local and State guidelines (FHWA FHMP 773, State Office of Noise Control, local noise ordinance and general plan noise element, etc.) • demonstration that all significant noise impacts have been mitigated in a manner consistent with the provisions of applicable local ordinances, as well as State and Federal guidelines. 	LACTC	<p>A) LACTC B) Biennial Report</p>

00151

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
<p>New park-and-ride locations may cause an increase in mobile noise levels for adjacent land uses as a result of a significant increase in vehicle trips to the area. Stationary noise levels may also increase as a result of the construction of parking structures with ventilation systems or from parking areas where sounds such as engine run-ups, door slams, car alarms etc. would be more common.</p> <p>Indirect Effects: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, which has not been anticipated in the regional plans, the CMP could have a negative effect on noise by increasing traffic in areas with relatively low background noise levels. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible. Also a possibility is that CMP-related improvements could increase the density of trips and traffic in center areas such as near transportation centers, rail transit stations, park-and-ride lots, etc. In these cases, the noise effect of the CMP could concentrate an increase in both mobile and stationary noise levels in the immediate vicinity of these new facilities.</p>	<p>Mitigation measure C.3 addresses indirect noise impacts.</p>		

00152

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	Monitoring Agency A) Monitoring Agency B) Monitoring Phase
<p>Direct Effects: Construction of CIP projects could result in the following geotechnical impacts: construction related erosion; increased risk of slope failures, mudslides, and rock falls; a limited potential for subsidence or soil-related impacts; and seismic risks.</p>	<p style="text-align: center;">GEOLOGY</p> <p>E.1 LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the geological impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency address, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • preparation in accordance with applicable local and State guidelines (Caltrans, Division of Mines Geology, local ordinances). • adequate geotechnical investigations regarding grading, slope stability, seismic hazards, potential ground acceleration. • the appropriate level of coordination with the State Division of Mines and Geology and identify specific mitigation measures to be implemented. • are designed in accordance with County and local code requirements for seismic ground shaking with special attention to the seismic design of bridges, elevated structures and tunnels. • demonstrate that all significant geotechnical factors have been mitigated in manner consistent with the provisions of sound engineering practice and applicable local ordinances. 	LACTC	<p>A) LACTC B) Biennial Report</p>

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
<p>Indirect Effects: Should implementation of the CMP result in increased urban deconcentration, or concentration, or expansion of development in outlying areas, in closer proximity to active faults which has not been anticipated in the regional plans, the CMP could have a negative effect on seismic risk by increasing vehicle miles traveled. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impacts analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.</p> <p>Also a possibility is that CMP-related improvements could increase pressures for increased population and employment density in areas adjacent to transit stations, transit lines, transportation centers, etc. A new concentration of population and/or employment, particularly in multi-story buildings could increase human exposure seismic event risks.</p>	<p>Mitigation measure C.3 addresses indirect geological impacts.</p>		

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
WATER			
<p>Direct Impacts: CIP projects could affect beneficial uses through the destruction of habitat and changes in surface water quality. Implementation of the CMP could have a short adverse effect on nearby surface water bodies during construction of CIP related projects. These effects would include increased sedimentation engineered by excavation and grading activities, as well as pollution from vehicular oils and grease. Long-term impacts could result from increased highway and transit associated facilities operations and their associated pollution (such as vehicular oils and grease emissions). The level of pollution produced would be a function of the number and lengths of trips made on these new facilities.</p>	<p>F.1 LACTC shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the water resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • For large-scale capital improvement projects, such as freeway, HOV, rail and interchange projects, appropriate ecologically-oriented maps are obtained and used during the planning process for CIP projects. Every effort is made to avoid areas that are currently used or are anticipated to be used for ecologically beneficial purposes. Every effort is made to minimize all disturbances in areas where construction is mandatory. All areas are restored to their original pre-construction condition, including the re-introduction of all uncontaminated soil and the replacement of all native vegetation. In the coastal zone, coastal zone planning and management programs are utilized to reduce adverse impacts to coastal water quality and preserve or improve areas of special water quality significance such as bays and estuaries. • For large-scale CIP projects such as freeway, HOV, rail and interchange projects, a comprehensive site investigation is conducted by ecological and water quality specialists to provide input into the above planning and mitigation design process and to confirm expected onsite conditions prior to the initiation of demolition and construction activities. 	LACTC	<p>A) LACTC B) Biennial Report</p>

00155

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
	<ul style="list-style-type: none"> • Planning, construction, and operational activities are coordinated with appropriate ecological and water resources agencies and are conducted in accordance with the requirements of the Federal Water Pollution Control Act, the Water Quality Act and the Clean Water Act, including NPDES and Section 404 permit requirements. • Natural conditions are maintained or simulated wherever possible to minimize effects at stream crossing. Single-span bridges are used when feasible. • Erosion control measures and runoff management, such as drainage channels, detention basins, and vegetated buffers, are employed to prevent pollution of adjacent water resources by runoff from transportation facilities. Wherever physically feasible, detention basins are equipped with oil and grease traps which are cleaned regularly. Treatment and disposal of excavated materials is well-planned. • Water conservation measures listed in the BMP are incorporated into the planning and design of CIP projects and their mitigations. • Use of permeable surfaces and channelization of flows to recharge areas are incorporated into project design, where possible, to promote water percolation and removal of metals. • All demolition, construction, and operational activities are conducted in accordance with all applicable regulatory requirements. <p>Mitigation measure A.3 would reduce long-term water quality impacts associated with CIP project operation.</p>		

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
<p>Indirect Effects: Should implementation of the CMP result in increased urban deconcentration or concentration or expansion of development in areas containing beneficial uses, significant indirect impacts could result.</p> <p>Deconcentration could also decrease the amount of open land that is currently available for ground water recharge, either through natural means or through use of reclaimed water. Efforts to foster reclamation projects to increase local ground water supplies could be significantly curtailed because of the area requirements associated with the reuse of treated effluent. Lastly, the interdependent effects of deconcentration would increase the need for and restrictiveness of large-scale water conservation programs.</p>	<p>Mitigation measure C.3 would reduce the indirect impacts of the CMP of beneficial uses and the water supply/demand balance.</p>		

00157

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
BIOLOGICAL RESOURCES			
<p>Direct Impacts: To the extent that the CMP is successful in maintaining LOS in the vicinity of SEA's the CMP would have a beneficial impact as a result of reduced congestion and air pollution. If the CMP results in the diversion of traffic to corridors passing through SEA's, or from already-congested corridors to corridors which are currently relatively free-flowing, leading to increased levels of congestion, traffic, and air pollution in proximity to SEA's the CMP may have an adverse effect on biological resources. Some CMP CIP projects may be routed through SEA's. Any capital improvement projects located in or near SEA's pose the potential for significant biological impacts.</p>	<p>G.1 LACTC shall review project-level EIR's for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the biological resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p>	<p>LACTC</p>	<p>A) LACTC B) Biennial Report</p>

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
	<ul style="list-style-type: none"> • Prior to any new construction on existing or proposed highways within the boundaries of an SEA, the need for construction is reviewed and substantiated, and alternative alignments or appropriate mitigation measures are investigated and implemented as feasible. If no feasible alternative or mitigation is found, the project is performed in the most environmentally sensitive manner possible. • Site-specific studies are required for each CMP capital improvement project located in the vicinity of an SEA, or in any area identified as potentially significant by the local jurisdiction, to determine whether significant plant or animal life is present in a proposed alignment and the level of impact on those resources. In consultation with the California Department of Fish and Game and the U.S. Fish and Wildlife Service and the local jurisdiction in which the project is located, detailed biological surveys are conducted prior to the adoption of roadway alignments which have the potential to adversely affect significant biological resources. • Appropriate consultation with the California Department of Fish and Game occurs to determine if special status species, not identified under the SEA program, occur in the project vicinity. • Vegetation removal occurs only where absolutely necessary for grading; revegetation with appropriate native plants is to be implemented as feasible. • Capital improvement projects which take place in recognized wetlands comply with local, state, and federal regulations governing the protection of these areas. 		

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
<p>Indirect Impacts: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas, particularly areas containing significant ecological resources, which has not been anticipated in the regional plans, the CMP could have a negative effect on biological resources. The potential for the CMP to reinforce urban deconcentration is discussed in detail as part of the growth inducing impact analysis contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.</p>	<ul style="list-style-type: none"> Capital improvement projects within the coastal zone comply with coastal zone planning and local government management programs which prevent or reduce impacts on biological resources within the coastal zone. <p>G.2 LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(2) of the Streets and Highways Code for acquisition or enhancement of resource lands to mitigate the loss of, or the detriment to, resource lands lying within the right-of-way acquired for proposed transportation improvements.</p> <p>Mitigation measure C.3 would reduce the indirect impacts of the CMP on biological resources.</p>	<p>LACTC</p>	<p>A) LACTC B) Biennial Report</p>

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
CULTURAL RESOURCES			
<p>Direct Impacts: While prehistoric sites or artifacts could be discovered in the urbanized areas of Los Angeles County, it is likely that any archaeological sites on the surface would have been destroyed during past urbanization. Generally in the urbanized or urbanizing areas, archaeological and paleontological resources are uncovered during the construction phase of a project.</p> <p>The National Register entries, National Landmarks, State Landmarks, local designations, and Los Angeles Historio-Cultural Monuments are located along or near many of the streets and highways of the CMP Roadway System. Inclusion of a roadway or highway segment on the CMP network could ultimately lead to improvement projects on or near that segment, should service deteriorate below CMP Level of Service standards. This could potentially lead to impacts on historic structures as part of CIP projects.</p>	<p>H.1 LACTC shall review project-level EIR's for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the cultural resource impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas into the EIR:</p> <ul style="list-style-type: none"> • The project sponsor contacts either the archeological resource information depository at UCLA or Cal State Northridge to determine the status of each site or corridor proposed for development, if it determined during project-specific environmental review that the site or corridor is likely to contain archaeological resources. • A professional archaeologist is retained to aid in the assessment of those sites or corridors considered to have moderate to high likelihood of containing archaeological resources, and to recommend a course of action for preservation of significant resources. 	LACTC	<p>A) LACTC B) Biennial Report</p>

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Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	Monitoring Agency A) Monitoring Agency B) Monitoring Party
	<ul style="list-style-type: none"> • During construction, at sites judged to have moderate to high likelihood of containing paleontological resources, a qualified paleontologist approved by the California Archaeological Inventory Regional Information Center is on call to remove fossil remains found during construction. If fossil remains are discovered during construction, all activity at the fossil site shall be stopped until the paleontologist has removed the remains. • For those sites or corridors for which environmental review or subsequent analysis indicates a less than moderate likelihood of containing archaeological resources, the following measures are taken: If any archaeological materials are encountered during the course of the project development, the project shall be halted. The services of an archaeologist shall be secured by contacting the Center for Public Archaeology - Cal State University, Northridge, or a member of the Society of Professional Archaeologist (SOPA), or a SOPA-qualified archaeologist to assess the resources and evaluate the impact. Copies of the archaeological survey, study or report are submitted to the UCLA Archaeological Information Center. • The environmental assessment adequately evaluates the potential for significant impacts to nearby historic resources including locally designated resources, and includes appropriate mitigations. 		

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
<p>Indirect Impacts: Should implementation of the CMP result in increased urban deconcentration, or concentration or expansion of development in outlying areas or the mountain or desert portions of the County, which has not been anticipated in the regional plans, the CMP could have a negative effect on cultural and archaeological resources in these areas.</p>	<p>Mitigation measure C.3 would reduce the indirect impacts of the CMP on historic resources:</p>		

00163

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
PUBLIC SERVICES			
<p>Direct Effects: The construction of individual CIP projects may temporarily slow police and fire department responses and disrupt access.</p> <p>Some CIP projects may require additional right-of-way adjacent to existing parks and recreational facilities, reducing the already limited parkland in the County. Increased traffic volumes and/or speed in proximity to parks and recreational facilities could result in increased noise impacts, inhibited access to facilities, and an increased number of automobile-related accidents. Site-specific studies required for each capital improvement project of the CMP with a potential for adversely affecting parks and recreational facilities will determine the level of impact on those facilities.</p>	<p>1.1 LACTC shall review project-level EIR's for CMP CIP projects. The review shall be intended to ensure that as part of project-level planning and the environmental assessments of individual CMP CIP projects, the Lead Agency incorporates appropriate mitigations in order to minimize the public service impacts of individual CMP CIP projects. As part of the review the LACTC may comment on the adequacy of the analysis and mitigations to ensure that the Lead Agency addresses, as appropriate, the following issue areas in the EIR:</p> <ul style="list-style-type: none"> • Prior to the construction of individual CMP capital improvement projects, the lead agency consults with affected police and fire departments to ensure these agencies adequate access to the affected portions of the CMP roadway network. • An assessment of the potential impacts to parks and recreational facilities is included in the environmental assessment of any CMP transportation facilities to be located in proximity to parks and recreational facilities which includes an assessment of traffic, noise, and access impacts. • An assessment of the potential impacts to schools is included in the environmental assessment of any CMP capital improvement projects to be located in close proximity to a schools which includes an assessment of traffic, noise and access impacts. 	LACTC	<p>A) LACTC B) Biennial Report</p>

Description of Impacts	Mitigation Measures	Party Responsible for Mitigation Implementation	A) Monitoring Agency B) Monitoring Phase
	<ul style="list-style-type: none"> LACTC shall seek Environmental Enhancement and Mitigation Demonstration Program Funds made available under Section 164.56(b)(2) of the Streets and Highways Code for acquisition or enhancement of resource lands to mitigate the loss of, or the detriment to, resource lands lying within the right-of-way acquired for proposed transportation improvements. 	LACTC	A) LACTC B) Biennial Report
Local governments compliance with the CMP could result in the diversion of local government personnel and revenues.	1.3 LACTC shall work with local jurisdictions to investigate a county-wide process to deal with future year CMP implementation. 1.4 LACTC shall continue to work with public and private interests regarding CMP requirements to minimize adverse public/private cost impacts associated with the CMP.	LACTC	A) LACTC B) Biennial Report

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818 West Seventh Street, 12th Floor • Los Angeles, California 90017-3435 ☐ (213) 236-1800 • FAX (213) 236-1825

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June 17, 1992

Kendra Morries, Project Manager
Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street - 2200
Los Angeles, CA 90017

RE: Revised Notice of Preparation of a Draft Environmental Impact Report and Initial Study
SCAG CLEARINGHOUSE # LA-55791-MT

Dear Ms. Morries:

We have concluded review of the above project and determined that it is regionally significant. Enclosed you will find a copy of our general requirements for environmental documents being prepared for regionally significant projects. The EIR should also address conformity with the South Coast Air Quality Management Plan (AQMP) using procedures included in the Guidance for Implementation of AQMP Conformity Procedures.

A description of the project was published in the June 15 Semi-Monthly Intergovernmental Review Listing for public review and comment.

The project title and SCAG number should be used in all correspondence with SCAG concerning this project. Correspondence should be sent to the Clearinghouse Coordinator. When additional documents are sent to SCAG, please provide three copies so that the project is generated to the respective analysts. If you have any questions, please contact Mike Ouellett (213) 236-1886.

Sincerely,
Eric H. Roth

ERIC H. ROTH
Manager, Intergovernmental Review

**ENVIRONMENTAL DOCUMENTATION AND REVIEW
GENERAL REQUIREMENTS**
for
**NEGATIVE DECLARATIONS, MITIGATED NEGATIVE DECLARATIONS,
NOTICES OF PREPARATION, ENVIRONMENTAL IMPACT REPORTS, ENVIRONMENTAL
ASSESSMENTS, AND RELATED DOCUMENTS**

The general requirements for the review of regionally significant projects are based on the disclosure of information, identification of impacts and a program for their mitigation, as required under CEQA. The requirements used presently by SCAG are revised as shown below to provide for the adoption of the Growth Management Plan, Regional Mobility Plan, and Air Quality Management Plan. (Revised November 1, 1989)

If any proposed project(s) will or could cause environmental impacts, such impacts must be consistent with the forecasts included in the Growth Management Plan and the Regional Mobility Plan (approved in February 1989) and the Air Quality Management Plan (approved in March 1989).

The relationships of the forecasts and policies mentioned above must be addressed and evaluated wherever applicable. Therefore, all of the documents listed above and other such studies and reports should address the issues below. (Not all issues will apply to every project.)

1. What are the impacts of the proposed project on population, employment, and housing? Give the growth forecast for each phase of the project, if phased.
2. Are the growth management goals and policies complied with?
3. Are the Jobs/Housing Balance performance goals being met?
4. Is housing availability discussed in terms of the income and wage levels of the local workforce?
5. What will be the cumulative impacts of the project in the subregion? How is this related to the Growth Management Plan forecast at the expected date of project completion or phase completion?
6. Are the provisions of the Air Quality Management Plan implemented at the local level and within the subregion? What are the air quality impacts of the projects? Are they being addressed?
7. For any project with transportation corridor-level impacts, what are the long-term impacts?
8. What assumptions are used in estimating the total trips generated by the project?
9. What are the related vehicular emissions?

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
cc: See Attached List
1400 TENTH STREET
SACRAMENTO, CA 95814

L.A.C.T.C.

1992 JUN 22 PM 12:57



DATE: Jun 18, 1992

TO: Reviewing Agency

RE: LOS ANGELES COUNTY TRANSPORTATION COMMISSION'S NOP for
CONGESTION MANAGEMENT PROGRAM FOR LOS ANGELES COUNTY
SCH # 91121063

Attached for your comment is the LOS ANGELES COUNTY TRANSPORTATION COMM Notice of Preparation of a draft Environmental Impact Report (EIR) for the CONGESTION MANAGEMENT PROGRAM FOR LOS ANGELES COUNTY.

Responsible agencies must transmit their concerns and comments on the scope and content of the EIR, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of this notice. We encourage commenting agencies to respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

KENDRA MORRIES
LOS ANGELES COUNTY TRANSPORTATION COMMISSION
818 WEST SEVENTH ST., STE 2200
LOS ANGELES, CA 90017

with a copy to the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the review process, call Tom Loftus at (916) 445-0613.

Sincerely,

A handwritten signature in cursive script that reads "Christine Kinne".

Christine Kinne
Acting Deputy Director, Permit Assistance

Attachments

cc: Lead Agency

NOP Distribution List

S = sent by lead agency

X = sent by SCH

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Air Resources Board
1102 Q Street
Sacramento, CA 95814
916/322-8267

Steve Ali
Calif. Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826
916/322-4235

State Water Resources Control Board

Allan Patton
State Water Resources Control Board
Division of Clean Water Programs
P.O. Box 944212
Sacramento, CA 94244-2120
916/739-4265

Dave Beringer
State Water Resources Control Board
Delta Unit
P.O. Box 2000
Sacramento, CA 95812-2000
916/322-9870

Phil Zentner
State Water Resources Control Board
Division of Water Quality
P.O. Box 100
Sacramento, CA 95801
916/657-0912

Mike Falkenstein
State Water Resources Control Board
Division of Water Rights
901 P Street, 3rd Floor
Sacramento, CA 95814
916/657-1377 (8-437)

APCDA/QMDS: **SOUTH COAST**

SCH#

Regional Water Quality Control Board

NORTH COAST REGION (1)
1440 Guerneville Rd.
Santa Rosa, CA 95401
707/576-2220 (8-590)

SAN FRANCISCO BAY REGION (2)
2101 Webster, Suite 500
Oakland, CA 94612
415/464-1255 (8-561)

CENTRAL COAST REGION (3)
81 Higuera Street, Suite 200
San Luis Obispo, CA 93401-5414
805/549-3147 (8-629)

LOS ANGELES REGION (4)
1075 S. Broadway, Rm. 4027
Los Angeles, CA 90012
213/266-4460 (8-640)

CENTRAL VALLEY REGION (5)
3443 Roulter Road, Suite A
Sacramento, CA 95827-3098
916/361-5600

Fresno Branch Office
3614 East Ashlan Avenue
Fresno, CA 93726
209/445-5116 (8-421)

Redding Branch Office
415 Knollcrest Drive
Redding, CA 96002
916/224-4845 (ATS 441)

LAHONTAN REGION (6)
2092 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
916/544-3481

Victorville Branch Office
15428 Civic Drive, Suite 100
Victorville, CA 92392-2359
619/241-6583

COLORADO RIVER BASIN REGION (7)
73-271 Highway 111, Suite 21
Palm Desert, CA 92260
619/346-7491

SANTA ANA REGION (8)
2010 Iowa Avenue, Suite 100
Riverside, CA 92507
714/782-4130 (8-632)

SAN DIEGO REGION (9)
9771 Clairmont Mesa Blvd., Suite B
San Diego, CA 92124-1331
619/265-5114 (8-636)

OTHER: _____

OTHER: _____



CITY OF LONG BEACH
DEPARTMENT OF PLANNING & BUILDING

MICROFILMED
COPY IN RMC

333 WEST OCEAN BLVD. • LONG BEACH, CALIFORNIA 90802

(310) 590-6458

Community & Environmental Planning Division

June 24, 1992

218399

Kendra Morries
Project Manager
Congestion Management Program
818 W. Seventh Street-2200
Los Angeles, CA 90017

Subject: Revised Notice of Preparation
Draft Environmental Impact Report
Congestion Management Program for
Los Angeles County

L.A.-C.T.O.
1992 JUN 25 09:11:26

We appreciate the opportunity to review the revised documents. Our comments principally concern the lack of mitigation fee in the CMP. We understand that staff is currently engaged in a planning and feasibility study regarding various approaches to address future congestion. Without inclusion of a mitigation fee, it will be very difficult to determine the impact upon local government since the alternative will be reduced or no development.

We strongly recommend that a mitigation fee be addressed as an alternative to the project.

We suggest that the Initial Study be changed to "yes" for 8) Land Use, 11) Population and 12) Housing.

Without a mitigation fee -- development will be stopped, thus causing significant impacts to land use, population and housing distribution.

Sincerely,



Gerhardt H. Felgemaker
Environmental Planning Officer

GHF:jm





City of El Segundo

July 10, 1992

Ms. Kendra Morries, Project Manager
Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street Suite 1100
Los Angeles, CA 90017

RE: *Revised Notice of Preparation of a Draft Environmental Impact Report and Initial Study for the Los Angeles County Congestion Management Program.*

Dear Kendra:

The City of El Segundo has reviewed the revised Notice of Preparation of a Draft Environmental Impact Report and has the following comments:

There are significant references to the SCAG-RMP-EIR and at this time we do not have enough information on that document to give an adequate review of this Revised Notice of Preparation.

The document does not include a reason for the elimination of the development fees discussion. The LACTC revised thirty (30) Year Financial Plan of April 1992 does not provide enough information to indicate that there will not be a need for development fees. Therefore, we feel that the Draft EIR should include an evaluation of the consequences if fees are not imposed.

We are looking forward to receiving the Draft Environmental Impact Report.

Please call Sara Rostamian, or myself, at 322-4670 ext. 401.

Sincerely,


Hyrum B. Fedje
Director of Planning and Building Safety

CMPDEIRIS.SR



PD400
NOP
DRAFT

RECEIVED
30 JUL 1992
RMC



CITY OF CULVER CITY

4095 OVERLAND AVENUE • P.O. BOX 507
CULVER CITY, CALIFORNIA 90232-0507

221039

July 9, 1992

Kendra Morries, Project Manager
Congestion Management Program
818 West Seventh Street - 2200
Los Angeles CA 90017

Revised Notice of Preparation of a Draft Environmental Impact Report and Initial Study for the Congestion Management Program.

Dear Ms. Morries:

Culver City appreciates the opportunity to comment on the revised Notice of Preparation (NOP) for the CMP draft EIR. The City of Culver city has reviewed the subject NOP and related Initial Study, our comments are enclosed. If you have any questions on the comments please contact me at (310) 280-5949 or Joan Kassan at (310) 202-5787.

Sincerely,

Colleen Egbert
CEQA Manager

enclosures

cmp79

cc: James D. Boulgarides, Mayor
Mike Balkman, Vice Mayor
Steve Gourley, Council member
Jozelle Smith, Council member
Albert Vera, Council member
Jody Hall-Esser, Chief Administrative Officer
Norman Y. Herring, City Attorney
Evelyn Keller, Deputy City Attorney

Kendra Morries
July 9, 1992
Page 2

Pauline Dolce, City Clerk
Mark Winogron, Community Development Director
Joan Kassan, Intergovernmental Relations Officer
David Ashcraft, Transportation Director
Jim Davis, City Engineer
Ken Johnson, Consulting Traffic Engineer
Jay Cunningham, City Planner
Carol DeLay, Deputy City Planner

REVISED NOTICE OF PREPARATION (NOP) CMP EIR COMMENTS

Submitted By: City of Culver City
City Contact: Colleen Egbert (310) 280-5949 or
Joan Kassan (310) 202-5787

1. General Comment 1: The TDM and Transportation Impact Analysis (TIA) Program sections of the CMP are still evolving and their potential environmental impacts cannot be adequately addressed at this time. As instructed in the Revised NOP, Culver City will be submitting program comments on these recent CMP revisions separately.

Culver City assumes it is the Commission's intention to follow-up with an additional EIR process on CMP elements not available at this time; however, for the record, it should be clarified by the LACTC that an environmental review will be conducted in the future for the TDM and TIA as well as the Deficiency Plan which will be developed as part of the 1993 CMP update. The economic impact of any fees and conditions required by these procedures must be fully assessed.

2. General Comment 2: The intent of the LACTC to "tier the environmental analysis of the CMP off the (1988) EIR for the Regional Mobility Plan" (RMP EIR) is recognized in the NOP to have limitations. Care should be taken throughout the EIR that 1988 assumptions and realities are still valid for the purposes of the CMP in the nineties.

- 2.a. For example, concerning Section 18 (Aesthetics), the Initial Study concluded that there will not be any discussion of aesthetics in the CMP EIR. However, there should be a discussion of impacts due to the passage of time since adoption of the RMP EIR.

Not only has the environmental setting (the visual landscape) of the County changed during the intervening years, but the public's perception of what is aesthetically offensive or acceptable has also changed during this time. Aesthetics are especially controversial because they are, by nature, somewhat subjective and, under Section 15064(h) of the CEQA Guidelines, the existence of a public controversy over the environmental effects should cause the lead agency to analyze those impacts in an EIR.

- 2.b. Also, the RMP EIR concludes that design of a project can mitigate impacts. However, the design of projects such as high-flow arterial, high-occupancy vehicle facilities, mixed-flow facilities and transit facilities will have changed over the intervening

years since the RMP EIR was adopted. Since the RMP EIR included a standard list of identified mitigation measures for the general type of facilities, and the CMP EIR has tiered off this list, the CMP EIR should include an updated and revised list of standard identified mitigation measures.

Therefore: Culver City disagrees with conclusion of Section 18 and comments that the CMP EIR should include an assessment of aesthetic impacts and not merely reference mitigations from the RMP EIR.

3. General Comment 3: The NOP repeatedly conditions the extent of the CMP EIR by affirming that individual projects under the CMP will be "subject to EIR review in accordance with CEQA". Culver City strongly supports this position which should be included in the EIR as a requirement that specific projects be individually assessed for environmental impacts under CEQA, especially, if they are proposed adjacent or near residential areas.
4. General Comment 4: The NOP does not directly address the potential growth and/or density inducing impacts of the CMP.

Although the final design of the CMP is not yet known, LACTC has consistently advanced the goal of encouraging increased densities along transit corridors especially at transit stations. Measures aimed at promoting such policies, for both residential and mixed-use development (as illustrated in LACTC support for AB 3093 and negotiations with the City of Los Angeles for special transit station land use status) should be assessed in the EIR concerning impacts on noise, land use, population, housing, public services, recreation, etc.

5. The following comments apply to Section 8 (Land Use), 11 (Population), and 12 (Housing):
 - 5.a. The CMP should be assessed for its impact on discouraging low-density sprawl. As currently proposed, the CMP will do nothing to discourage such sprawl.
 - 5.b. Although it is not known what type of financial or other development restrictions may apply to proposed development, the EIR should consider the effects of slowed or reduced development on City/County economies of such potential restrictions.

- 5.c. The environmental setting of the 1988 Regional Mobility Program (RMP) EIR may not have accounted for the recent population growth which has increased beyond the 1987 SCAG projections. Based on the increased population in Southern California, there is increased density in existing housing and increased demand for housing.
6. Concerning Section 2.b. (Air), "creation of objectionable odors", the Initial Study concludes that there will not be any impacts. The CMP may have both positive and negative impacts in this regard. The reduction of congestion and the steady movement of traffic may reduce idling of vehicles stopped in traffic thereby reducing fumes. On the negative side, the CMP may result in the short-term increase in fumes and odors due to construction of improvements. There is also the potential for the negative impact caused by objectionable odors if construction and use of roadways in new areas not currently developed takes place as well as such an impact from the introduction of additional traffic into various areas.
7. Concerning Section 17 (Human Health). If transmission lines are contemplated for any future transit corridor, current concerns should be acknowledged with the requirement of future study.
8. Concerning Section 22 (Transportation/Circulation). The plans to provide additional bus service as part of the CMP are very important elements. However, we want to make certain that these improvements allow for flexibility in use by local transit agencies. Culver City Municipal Bus Lines provide vital service for all types of trips including long distance commute trips. In evaluating the impact of RMP transit plans, The Culver City Municipal Bus Lines (CCMBL) should be included.
9. The following Culver City comments on the Final Draft CMP are relevant to the revised NOP for CMP EIR and are included here:

9.a. Traffic Impact Analysis

The local concern expressed in Chapter 7.2.5 of the Final Draft does not appear to be addressed: "The cost of requiring traffic impact analysis for small development is a serious concern to local jurisdictions". The Final Draft indicates all CMP traffic impact analyses must consider a five-mile radius. Smaller developments should be able to conduct impact analyses, qualifying to mitigate the

CMP fee, with study areas less than the 5 miles for larger projects. Costs for such studies should be in proportion to the scope of development.

In order for the shopping center threshold project size (Appendix I-2) to relate to the 150 vehicle trips in the peak direction, it is essential that CMP procedures continue to include the "assumption of 25% pass-by trips" as stated in Appendix I-2.

The interaction between a local jurisdiction and the CMA when project mitigations are identified and funded appeared to be a separate process in the Discussion Draft. The Final Draft does not address such projects. Clarification is needed in this regard. The second response in Appendix A-18 is not clear.

9.b. Deficiency Plan

How is a mitigation option to be assessed in terms of satisfying a deficiency?

9.c. Transit Comments

Changes in the CMP street network directly impact the transit monitoring network. The existing final draft is inconsistent. The existing transit network was intended to include all bus routes that are either on the CMP network or on a route for further study. But the final draft of the CMP lists Washington Boulevard as a route to be studied further but the corresponding bus routes are not on the transit network. This happened because additional streets were added to the "for further study list" after the transit network had been completed. Both systems must be consistent. Hence, if the CMA decides to either add/delete routes to the street network or decides not to have "routes for further study" anymore at all then major changes have to be made to the transit network.



Dana A. Woodbury
Director of Planning

July 9, 1992

Ms. Kendra Morries
Project Manager
Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 2200
Los Angeles, CA 90017

Dear Ms. Morries:

**Re: The Notice of Preparation of a Draft Environmental Impact Report for the
Los Angeles County Congestion Management Program**

The Southern California Rapid Transit District (SCRTD) has reviewed the revised Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Los Angeles County Congestion Management Program (CMP), and offers the following comments and concerns.

Because of the difficulty in separating issues relating to the CMP in general from those specifically relating to the DEIR, some of the following comments are also general comments on the CMP.

As the CMP is currently written, we believe that it is likely to have some environmental effects more serious than indicated in the Initial Study. In particular, we think items 21-b (potential to achieve short-term, to the disadvantage of long-term environmental goals) and 21-d (environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly) either will have, or may have, negative effects.

The rationale for these conclusions is covered in detail in the attached Board Report. Briefly summarized, we believe that the CMP emphasizes major highway corridors and high speeds, and in so doing, will cause a shift of resources away from lower speed and highly effective transit service, and thereby induce further spreading of the urbanization pattern, with concomitant increases in vehicle miles traveled (VMT), leading to worsened air quality, increased fuel consumption, and higher cost of living. These are macro effects that are not so easy to analyze, but the DEIR should make the best possible attempt to do so.

The DEIR should incorporate a clearly defined method of determining the threshold of significance for a project with regional transportation impacts as well as a requirement and guidelines for a comprehensive traffic mitigation program to mitigate such impacts.

Ms. Morries
July 9, 1992
Page 2

The Transportation Impact Analysis element of the CMP provides an opportunity to develop a more comprehensive measure, other than the traditionally used Level of Service (LOS), of the transportation impacts of a proposed project.

SCRTD feels that there is a fundamental flaw in defining the threshold of significant traffic impact in terms of a change in the LOS of nearby intersections. Defining significant impact in terms of LOS means ignoring the impact of additional vehicle trips as long as there is no step deterioration in LOS.

Traditionally, when a project is determined to have a significant traffic impact due to a deterioration in LOS, the resulting tendency has been to expand roadway capacity to improve the LOS. However, expanding roadway capacity often exacerbates the traffic problem in the long-run by encouraging more people to drive.

SCRTD believes that the solution to the regional traffic problem lies not in expanding roadways, but in diverting additional trips to higher capacity modes and avoiding as many vehicle trips as possible. We view the threshold of significance as any likely increase in net vehicle trips or VMT. We also believe that the goal of traffic mitigation should be to achieve full mitigation i.e., a project should not result in a net increase in vehicle traffic in the region even though the project itself will usually result in additional traffic.

SCRTD feels that a more objective and explicit measure of the traffic impacts of a project is crucial to the effectiveness of the Transportation Impact Analysis program and ultimately to the CMP itself. Thus, we recommend that the DEIR seriously explore alternative measures of traffic impact such as VMT, vehicle trips or a combination thereof. If LOS must be used, it should be modified to measure the person-carrying capacity of a roadway rather than its vehicle-carrying capacity.

The new requirement for TDM ordinances is intended to help communities to deal with the effects of land use on the transportation system. The approach taken, of providing a model ordinance intended as the basic minimum, will give the communities the maximum flexibility for their individual circumstances. On the other hand, if few communities go above the basic ordinance, the environmental benefits may be insignificant. The EIR should address the impacts that these ordinances will have in the aggregate, assuming universal adoption of the basic ordinance.

Presuming that the ordinances would also lead to changes in related instruments of land use, such as zoning and specific plans, the EIR could also assess the administration impacts of making the necessary changes, in terms of costs and time frames.

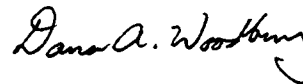
Finally, SCRTD would like to draw attention to the fact that the basic underlying concept of the CMP is in some doubt as to its air quality impact. Absent a strong component of active pricing strategies, reduction of congestion will amount to a capacity increase which will promote further low density development,

Ms. Morries
July 9, 1992
Page 3

which will result in higher VMT. This flaw, in the original legislation, has been recognized and has resulted in proposals for corrective legislation. Nevertheless, the DEIR should address the issue forthrightly and should perhaps suggest that active road and parking pricing could be included as a backup to insure against the negative impact on air quality, or the same assurance could be provided through managed congestion.

We look forward to receiving the DEIR when it becomes available. If you need additional information, please contact Joel Woodhull, Planning Manager, at (213) 972-4850.

Sincerely,



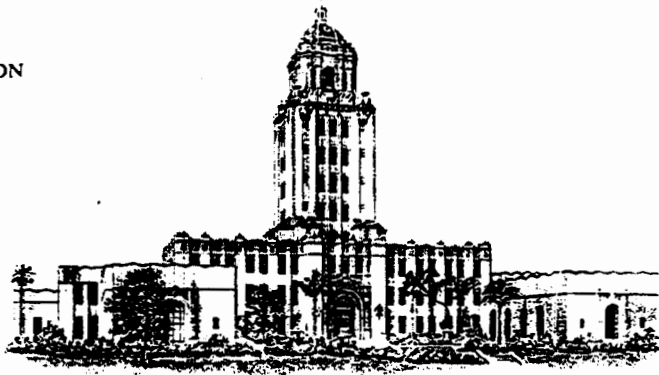
Dana A. Woodbury

Attachment



DEPARTMENT OF TRANSPORTATION
(310) 285-2551
FAX: (310) 273-1096

455 N. Rexford Drive
Beverly Hills, CA 90210-4817



CITY OF BEVERLY HILLS

July 8, 1992

Ms. Kendra Morries, CMP Project Manager
Los Angeles County Transportation Commission
818 West Seventh Street - 2200
Los Angeles, CA 90017

Dear Ms. Morries:

Thank you for the opportunity to comment on the Revised Initial Study describing the potential environmental impacts of the Congestion Management Program (CMP). We appreciate being included in the Environmental Impact Review process, and look forward the improvements in regional mobility resulting from the CMP.

We are supportive of the Revised Initial Study, but have one concern. On page 20, it states that "rail related capital improvement projects are included in the CMP." If this is correct, there seems to be a contradiction on page 19 where it states there is "no increased risk of explosion or release of hazardous substances... as a result of implementation of the CMP." It is recommended that this contradiction be clarified.

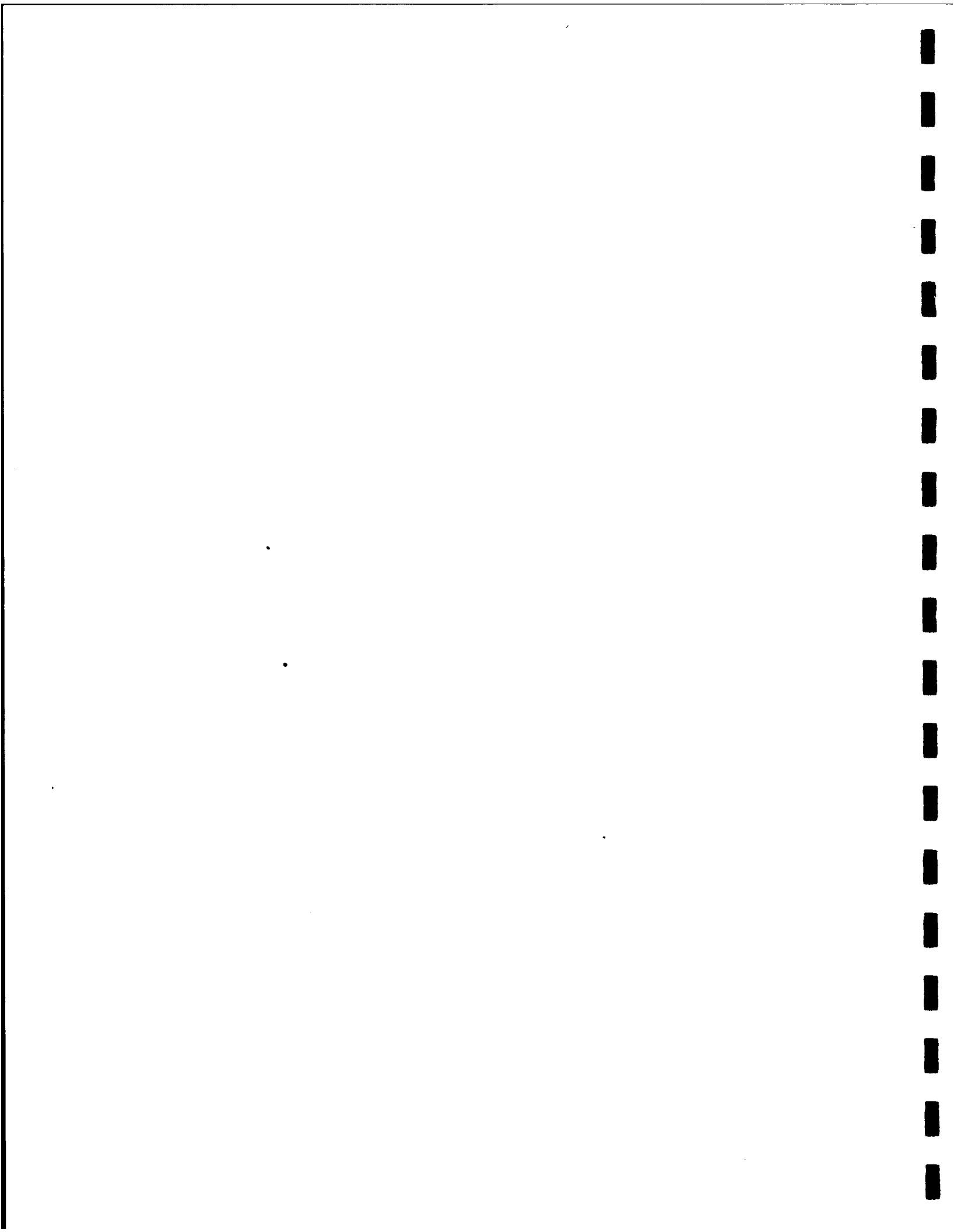
Again, thank you for the opportunity to provide our comments concerning the Initial Study of the CMP. We look forward to working with you on the next step in the process.

Sincerely,

Maria Rychlicki
Director

MR:AD:vt

cc: Mark Scott, City Manager



FD142 / NOP



COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

220355

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (818) 458-5100

THOMAS A. TIDEMANSON, Director

July 8, 1992

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE P-4
REFER TO FILE.

Ms. Kendra Morries, Project Manager
Congestion Management Program
818 West Seventh Street-2200
Los Angeles, CA 90017

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IN RMC

Dear Ms. Morries:

RESPONSE TO A NOTICE OF PREPARATION
CONGESTION MANAGEMENT PROGRAM

Thank you for the opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the proposed Congestion Management Program (CMP). We have reviewed the NOP and offer the following comments:

Los Angeles County Transportation Commission is now working with Southern California Association of Governments and South Coast Air Quality Management District on a Phase II Transportation Demand Management (TDM) Ordinance that could fulfill local governments' deficiency plan requirements under the CMP if they adopt and implement the Ordinance. The impact of this Ordinance which is expected to be much more stringent than the Phase I TDM Ordinance should be addressed in the DEIR.

If you have any questions regarding these comments, please contact Mr. Barry Witler of our Planning Division at (818) 458-4351. Questions regarding the environmental reviewing process of this Department can be directed to Ms. Clarice Nash at the above street address or at (818) 458-4334.

Very truly yours,

T. A. TIDEMANSON
Director of Public Works

CARL L. BLUM
Assistant Deputy Director
Planning Division

MA:mv.129



FD-400
NOP
DRAFT
CMP



221070

CITY OF SIGNAL HILL

2175 Cherry Avenue - Signal Hill, California 90806 • (310) 426-7333 • FAX (310) 427-3276

July 7, 1992

Ms. Kendra Morries
Project Manager
Congestion Management Program
818 West Seventh Street, Suite 2200
Los Angeles, Ca. 90017

SUBJECT: Environmental Impact Report
Congestion Management Program

Dear Ms. Morries:

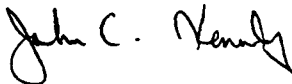
The City of Signal Hill has reviewed the revised Notice of Preparation of Draft Environmental Impact Report and Initial Study and has the following comments:

1. The Project Description should include an element addressing the monitoring of major intersections along the CMP Network. In many cases, if not most cases, the operation of intersections defines the operational characteristics and capacity of highway and roadway segments. The level of service standards should revolve around intersection capacity and not roadway segments.
2. Impacts on jurisdictions not located along a CMP route should be addressed. Often the CMP System and key intersections are within the boundaries of a city for which the intersection is not significant, while it is significant for an adjoining city. A case in point is the intersection of Pacific Coast Highway (State Route 1), and Cherry Avenue in Long Beach. This intersection is entirely in the City of Long Beach, and is the major entrance to the City of Signal Hill. Long Beach does not see improvement of the intersection as a high priority. Several times Signal Hill has promoted improvement of this intersection under various funding mechanisms with some success only to have the City of Long Beach decide that other projects within that City have higher priority. A project selection process should be developed that is truly regional and not just controlled by the city where it is located.

3. Impacts on jurisdictions along freeways should be addressed for impacts of access to and from freeways, design and capacity of freeway ramps and, stacking on arterial streets which affect local traffic flows and commercial activities.

Please contact myself or Les Evans, City Engineer for more information. Thank you for the opportunity to comment on this matter.

Sincerely,



John C. Kennedy
Director of Public Works

JCK/mec

cc: Dave Cosgrove
Rutan & Tucker
Les Evans

P12700
CMP
NOP
DRAFT

City of
Santa Clarita

23920 Valencia Blvd.
Suite 300
City of Santa Clarita
California 91355

Phone
(805) 259-2489
Fax
(805) 259-8125

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COPY IN FILE



221065

July 7, 1992

Ms. Kendra Morries, Project Manager,
Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, California 90017

Jill Klajic
Mayor

Jan Heidt
Mayor Pro-Tem

Carl Boyer
Councilmember

Jo Anne Darcy
Councilmember

George Pederson
Councilmember

RE: CMP: Notice of Preparation of a Draft Environmental Impact Report

Dear Ms. Morries:

Thank you for offering us the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Congestion Management Program, and we look forward to commenting on the DEIR once it is completed. At this time, we have identified the following concerns:

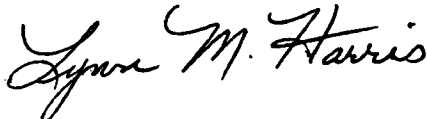
- 1) The last paragraph on page 2 states, "At the direction of the LACTC Commission, the CMP will not include a mitigation fee." How will the CMP insure that individual cities mitigate impacts on the regional system on a uniform basis? Without the fee, how can impacts on the regional system be mitigated? Without the mitigation fee, how will projects in the CMP-CIP be funded?
- 2) The City is concerned that the issue of deficiency plans, and the approach that the region will take regarding them, will not be part of the environmental review for the CMP. (page 2)
- 3) Since the CMP EIR will be tiered to the EIR prepared in conjunction with the Regional Mobility Plan (RMP), the RMP EIR should be an attachment to the CMP EIR. This will be helpful since the environmental reviews for particular development projects will be tiered to both the CMP and RMP EIR's to determine impacts on the CMP Network.
- 4) The CMP EIR should include the list of site-specific projects comprising the Seven Year CMP Capital Improvement Program (CIP).
- 5) The CMP EIR should contain an updated draft of the CMP, as various sections have been revised since the last draft appeared.

Ms. Kendra Morries, Project Manager
LACTC, Congestion Management Program NOP
July 9, 1992

- 6) The City believes that the CMP EIR should contain sections on population, employment, housing, human health, utilities, aesthetics and risk of upset. The City also questions the conclusion expressed in the NOP that the CMP will have no impact on some of these areas.
- 7) The City believes that "MAYBE" should be checked for the following sections, rather than "NO", which is currently checked: 1a; 2b; 2c; 10a; 11a; 12a; 13f; 14f; 16e; 21a; and 21d.

Thank you again for the opportunity to comment on the Notice of Preparation for the CMP-EIR, and we look forward to commenting on the Draft EIR. If you have any questions or comments on this letter, please contact Kevin Michel at (805) 255-4351.

Sincerely,



Lynn M. Harris
Deputy City Manager/
Community Development

LMH:KJM:jcg:309

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-6610



July 3, 1992

County of Los Angeles
IGR/CEQA/NOP- Congestion
Management Program For Los
Angeles County
Vic LA-COUNTY-WIDE
SCH # 91121063

Ms. Kendra Morries
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Dear Ms. Morries:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. Based on the information received, our comments are the same as those of our letter dated 1/24/92. Items which should be covered for the project include, but are not limited to:

- A. Trip generation/distribution including the method used to develop the percentages and assignment.
- B. ADT, AM and PM peak-hour volumes for both the existing and future (Year 2010) conditions. This should include State facilities (Freeways and Highways) and all significantly affected ramps, streets, crossroads and controlling intersections, as well as an analysis of existing and future conditions on mainlines (Freeways and Highways).
- C. An analysis of future (Year 2010) conditions which include project traffic and the cumulative traffic generated for all approved developments in the area.
- D. Consideration should be given to providing mitigation for congestion relief. Any mitigation proposed should be fully discussed in the document. These discussions should include, but not be limited to, the following:
 - * financing
 - * scheduling considerations
 - * implementation responsibilities
 - * monitoring
- E. Consideration should be given to requiring developer contributions or fair-share funding for transportation improvements on State facilities.

Ms. Kendra Morries
Page Two
July 3, 1992

- f. The land use analysis requirements should include assurances that local jurisdictions consider transportation and land use impacts of new developments on the mainline regional freeway system.
- g. The CMP Transportation Impact Analysis Program and Deficiency Plan should include all State (Freeways and Highways) and an identification of deficiencies below the established level-of-service standards.
- h. Proposed Flexible Congestion Relief (FCR) and Transportation System Management (TSM) and High Occupancy Vehicle (HOV) projects are to be coordinated with Caltrans.

We look forward to reviewing the DEIR. We expect to receive a copy from the State Clearinghouse. However, to expedite the review process, you may send two copies in advance to the undersigned at the following address:

Wilford Melton
District 7 IGR\CEQA Coordinator
Advance Planning Branch
120 So. Spring Street
Los Angeles, CA 90012

Thank you for this opportunity to comment. If you have any questions regarding these comments, please call me at (213) 897-1338.

Sincerely,


WILFORD MELTON
IGR\CEQA Coordinator
Advance Planning Branch

cc: State Clearinghouse
1/24/92

ab/12049

1-2-92
NOIP

Los Angeles Unified School District

Business Services Division

WILLIAM R. ANTON
Superintendent of Schools

ROBERT BOOKER
Chief Business & Financial Officer

DAVID W. KOCH
Division Administrator, Business Services

C. DOUGLAS BROWN
Deputy Administrator, Business Services

BOB NICCUM
Director of Facilities Planning & Real Estate

Environmental Review File
Congestion Management Plan

220071

June 30, 1992

Kendra Morries, Project Manager
Congestion Management Program
818 West Seventh Street-2200
Los Angeles, CA 90017

MONOCOPYED
BY RMC

Dear Ms. Morries:

Re: Congestion Management Program for Los Angeles County

In response to the Notice of Preparation for the Congestion Management Program, this office re-submits the comments (attached) of January 8, 1992. These comments should be incorporated by reference in this letter.

It was disturbing to note that the revised Initial Study for the Congestion Management Plan has changed the determination under the sub-category of schools from "maybe" to "no". This was done subsequent to and despite the submission of our January 8, 1992 comments, and to the response to our comments from Bradford W. McAllester (attached) stating that our comments would be considered in drafting the EIR and in developing the Congestion Management Program.

Though our January 8, 1992 comments apparently were heeded in that an addition was made to the Initial Study under the category "Air", the removal of Schools from the Public Services category indicates an ignorance or disregard of other significant adverse impacts on schools. Among these impacts are those which would result from the CMP's land use analysis requirements (VMT formulas and jobs-housing formulas which are devised to improve traffic and air quality in several respects adversely impact schools and ignore resulting increases in home-to-school commuting). Please revise the Initial Study determination for schools to indicate that the CMP may create a significant adverse impact.

More importantly, might the "no" determination under the "Schools" sub-category encourage lead agencies for all site-specific projects under the Capital Improvement Program to refrain from reviewing school impacts such as noise and pedestrian safety?

All site-specific projects such as those included in the Capital Improvement Programs should receive the limited review under the category "Air" for "Emission of hazardous air pollutants within one-fourth mile of a school", as well as the broader review under "Schools" which would include:

- . analyses of noise levels along major corridors; if near schools, these impacts should be addressed under specific criteria which should be developed for sensitive receptors.
- . analyses of impacts on pedestrian routes to school, and on bicyclists.
- . Other safety-related impacts, including risk-of-upset and construction hazards.

The CMP's land use analysis requirements should be structured to acknowledge that land use patterns which continue to overwhelm the available educational infrastructure result in increased traffic, congestion, and a deterioration of air quality.

The Initial Study at page 19 says that "The RMP EIR assumes the land use pattern of the GMP. The CMP is consistent with the goals and objectives of the RMP and GMP. At this time the CMP does not include any components which would significantly alter the land use in the region. For this reason, no population, employment or housing section will be included in the CMP EIR." This office finds fault with this dependence on a previous study. To the extent Jobs-Housing and VMT were not considered in the RMP and GMP, land use pattern is impacted, and these transportation strategies, as devised, have an adverse impact on schools.

Page 21, paragraph 3 of the Initial Study refers to "short-term" construction related impacts. Please define "short-term". Where such impacts affect schools, we ask that they be clearly defined and assessed as part of the site-specific environmental review.

We repeat our concern that it is not sufficient to tier this EIR on the 1988 EIR for the Regional Mobility Plan (RMP), in that neither the 1988 EIR, nor the earlier Growth Management Plan EIR, provided a thorough review of the impacts on schools, and in that it was not circulated for review to this agency nor perhaps to others that have jurisdiction over schools. This CMP may have significant impacts not analyzed in the previous EIRs.

In fact, the mitigation measures provided in the Regional Growth Management Plan suggest merely that local school districts should implement measures to accommodate growth. There is no acknowledgment that most school districts have no funds with which to implement the suggested measures. The suggestion that alternative financing mechanisms be established is one which needs further attention in the CMP EIR. Another suggestion of the GMP, that school districts increase transportation of students from overcrowded schools to schools with surplus space, ignores the fact that schools in some districts will have no

surplus space, that transportation is expensive and demands scarce funds which should otherwise be used to improve or even maintain educational programs, and that it should be far preferable to work toward a jobs-housing-schools balance to avoid home-to-school commuting, than to strive toward a jobs-housing balance that puts additional burdens on the region's school districts.

Our January 1992 letter refers to the type of adverse impacts that this Congestion Management Plan can have on schools. In light of this, the CMP Initial Study determination of no impact should be changed to "yes", the CMP impacts to schools should be thoroughly analyzed, and mitigation measures provided. There will definitely be impacts on schools.

In particular, the Transportation Impact Analysis Program will impact schools. Local jurisdictions are too often negligent in observing CEQA mandates as they pertain to mitigating impacts of new development on schools. There must be built-in safeguards, such as revisions to the jobs-housing and VMT formulas, which will encourage balanced growth. Please consider the following issues in the Environmental Impact Report for the CMP, and as you draft an improved CMP for Los Angeles County.

Increased traffic will result from a continuing disregard of the need for a jobs-housing-schools balance: The EIR for the CMP should discuss in detail, and offer solutions to, the increasing traffic which results from cities' and agencies' approval of new residential development in areas where schools are already overcrowded. To the extent that jobs and housing are balanced, but schools are not, the savings in home to work commuting will be partially if not entirely negated by the increase in home to school commuting, as students must travel long distances by car or bus to schools elsewhere in the District that have available classroom space. Thus, lack of adequate school infrastructure to serve a community leads to increased traffic and a deterioration of air quality.

It is possible that as school districts approach a limit to the amount of funding cuts they can make to educational programs to pay for busing programs, continued growth in areas of overcrowded schools and continuing budget constraints may lead to cuts in bus transportation of students. Parents would then need to drive children to and from schools outside their areas - adding a worst-case four trips per day as parents drive to school and back in the morning, and repeat the trips in the afternoon. Triangular trips from home to school to job would also add to traffic and deteriorated air quality.

The CMP should direct that all planning agencies within the County use trip rates which reflect these additional trips if a project is built in an area of overcrowded schools. The standard Institute of Transportation Engineers (ITE) rates were never intended to be reflective of daily per-unit trips where units are built in areas where parents regularly must drive their students to and from schools, often many miles from the residence. Other factors which would lead parents to drive students to school are congested or dangerous traffic conditions, or unsafe pedestrian routes to school. Vehicle Miles Travelled (VMT) formulas and formulas for jobs-housing analyses should be revised to reflect additional trips resulting from imbalances in jobs-housing-schools. If this is not done, a major source of traffic and air emissions will be overlooked; more importantly, non-recognition of the relationship of traffic and air quality with adequate and appropriately sited schools would permit continued imbalances, and exacerbate congestion and poor air quality in urban areas.

Capital Improvement Programs Which Will Lead to Permanent Increases in Vehicular Air Emissions Proximate to Schools Should Be Subject to Careful Review, With Consideration of the Increased Susceptibility of Children and Young Adults to Poor Air Quality:

A study should be undertaken as explained on page 2 of the January 8, 1992 comments. The identification of schools as "sensitive receptors" in relation to air emissions and noise impacts would seem to indicate that emissions and noise thresholds for projects impacting schools should be lower than those accepted for other uses.

Traffic emissions, reentrainment of dust (containing lead and other metals) near highways and other toxic emissions are especially damaging to students, who are more susceptible than adults to poor air quality. [See "Air Sickness: Evidence Mounts of Dramatic, Permanent Damage to Lungs of Children," Los Angeles Times, E, p. 1, April 3, 1990.] Aside from being at greater risk due to physiological factors, students may be among the few in the area who are not provided state-of-the art air filtration/air conditioning systems. Compounding this, students exercise on the playground. Poor air quality may especially affect athletes, and compromise a full student athletic program.

Depending on conclusions of the above study, air quality and noise standards in specific areas near schools may need to be reappraised in light of possible damage to children. Alternatively, are there feasible and effective mitigation measures which can minimize such adverse impacts?

Ms. Morries

- 5 -

June 30, 1992

Thank you for your consideration of our concerns.

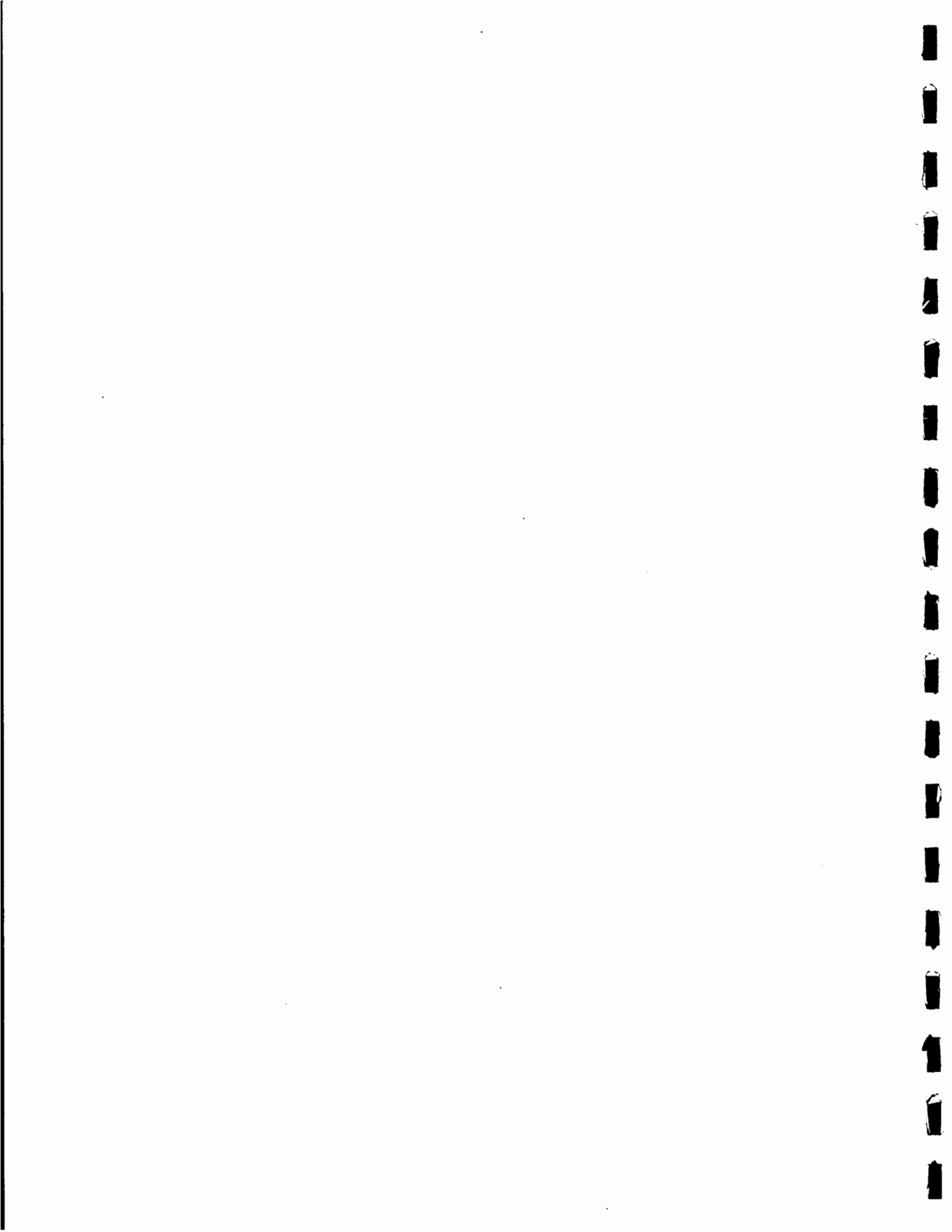
Very truly yours,



Elizabeth J. Harris
California Environmental Quality Act Officer
for the Los Angeles Unified School District

Attachments

c: Mr. Brown
Ms. Louargand
Mr. Niccum



Los Angeles Unified School District

Business Services Division

WILLIAM R. ANTON
Superintendent of Schools

ROBERT BOOKER
Chief Business & Financial Officer

DAVID W. KOCH
Division Administrator, Business Services

C. DOUGLAS BROWN
Deputy Administrator, Business Services

BOB NICCUM
Director of Facilities Planning & Real Estate

Environmental Review File
Congestion Management Plan

January 8, 1992

Brad McAllester
Manager, Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Dear Mr. McAllester:

Thank you for providing us the opportunity to comment on the scope and content of the Environmental Impact Report for the Congestion Management Program (CMP). A careful and detailed analysis of public service impacts (schools) of the CMP should be provided in this EIR.

Reliance on an analysis which was provided not in the broad [parent] Regional Mobility Plan EIR in 1988, but in the earlier Growth Management Plan, which was not even reviewed by this school district, is not acceptable. Such an analysis is probably too far removed in time and reality from the actuality of impacts which the CMP will impose on school districts, and is far removed from the intent of the California Environmental Quality Act. Please therefore provide careful analysis of the CMP on schools.

We agree with the NOP discussion on page 18 which states that the CMP could result in a positive impact on public services. Since children are especially sensitive to air pollution, we support efforts to improve the air quality of the South Coast Air Basin. There are, however, two areas of concern to the District, and we ask that you consider them during environmental review of the CMP:

- 1) The growth-inducing impacts of the Congestion Management Plan, especially in relation to schools, should be carefully analyzed. In many cases, phasing and location of transportation improvements will overwhelm the educational infrastructure, in that it will encourage growth in areas where schools are especially overcrowded (e.g., encouraging residential growth in areas of planned metro-rail stations may be beneficial in terms of transit and air quality, but not in terms of schools, because these areas typically are serviced by schools which are already way above-capacity). Broadly-defined mitigation measures should be provided in the CMP to avoid or to compensate for such impacts. Examples of such measures are provided in the attached letter. Additional measures should be added to facilitate construction of educational infrastructure in these areas.

Brad McAllester

- 2 -

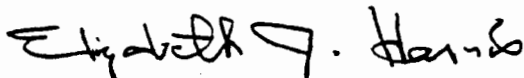
January 8, 1992

2) Certain traffic improvements may result in air emission "hot spots", and in unacceptable noise levels near schools. An example of such incompatibilities may be the proposed terminal parking lot across from Parkman Junior High School at Warner Center. The EIR for the CMP would be the appropriate document in which to provide a detailed study on air emission criteria for such "hot spots" when they are located close to sensitive receptors such as schools. What mitigation measures (e.g., installing state-of-the-art air conditioners and exhaust systems in affected schools) can be provided to ensure that children are not exposed to harmful pollutants? Similarly, such analyses should also be provided for noise.

The NOP states that the demands of the CMP could divert resources from the provision of other government services. Since the CMP includes a section on financial strategies for accomplishing the plan, please analyze the plan in terms of the financial costs to the District, and the extent to which these costs may detract from monies currently used for educational programs.

Please incorporate by reference the attached October 15, 1991 letter into this response. Thank you for your consideration of our concerns. We will be pleased to work with you as you prepare the EIR for the Congestion Management Program.

Very truly yours,



Elizabeth J. Harris
California Environmental Quality Act Officer
for the Los Angeles Unified School District

Attachment

c: Mr. Brown
Ms. Louargand
Mr. Niccum

CITY OF LOS ANGELES
CALIFORNIA

BOARD OF
FIRE COMMISSIONERS
485-6032

JAMES E. BLANCARTE
PRESIDENT
CARL R. TERZIAN
VICE-PRESIDENT
AILEEN ADAMS
NICHOLAS H. STONNINGTON
KENNETH S. WASHINGTON

EVA WHITELOCK
EXECUTIVE ASSISTANT



TOM BRADLEY
MAYOR

DEPARTMENT OF FIRE
200 NORTH MAIN STREET
LOS ANGELES, CA 90012

DONALD O. MANNING
CHIEF ENGINEER
AND
GENERAL MANAGER

June 29, 1992

Kendra Morries, Project Coordinator
Congestion Management Program
Los Angeles County
Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Dear Ms. Morries:

Revised Notice of Preparation of a Draft
Environmental Impact Report and Initial Study

Any aerial or subway transit systems should adopt the Rail
Construction Corporation's fire/life safety criteria.

All street intersections with a level of service of "E" or "F"
decreases the level of fire protection and emergency medical
services provided by this Department.

For any additional information, please contact our Hydrant Unit,
at (213) 485-5964.

Very truly yours,

DONALD O. MANNING
Chief Engineer and General Manager

Dal L. Howard, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

DLH:ASM:cec:3140E

cc: Councilman Michael Hernandez
Councilman Joel Wachs
Councilwoman Joy Picus
Councilman John Ferraro
Councilman Zev Yaroslavsky

Ms. Kendra Morries
June 29, 1992
Page 2

Councilwoman Ruth Galater
Councilman Ernani Bernardi
Councilman Mark Ridley-Thomas
Councilwoman Rita Walters
Councilman Nate Holden
Councilman Marvin Braude
Councilman Hal Bernson
Councilman Michael Woo
Councilman Richard Alatorre
Councilwoman Joan Milke-Flores
Environmental Affairs Commission
Fire Department Planning Section
Brad McAllester, Congestion Management Program, Los Angeles ✓
County Transportation Commission, 818 W. Seventh Street,
Suite 1100, Los Angeles, CA 90017

11400 / 1100



CITY OF LONG BEACH

OFFICE OF THE CITY MANAGER

333 WEST OCEAN BOULEVARD

LONG BEACH, CALIFORNIA 90802

(213) 590-6711

JAMES C. HANKLA
CITY MANAGER

June 26, 1992

220082

Kendra Morries
Project Manager
Congestion Management Program
818 W. Seventh Street-2200
Los Angeles, CA 90017

MIOP
000

Subject: Revised Notice of Preparation
Draft Environmental Impact Report
Congestion Management Program for
Los Angeles County

Thank you for the opportunity to review the revised Notice of Preparation. The City of Long beach strongly supports the Congestion Management Program. We are, however, concerned that impacts to local municipalities be fully evaluated in the DEIR.

The deletion of the development mitigation fee from the Notice of Preparation is a significant change. While not advocating such a fee, we realize that a development mitigation fee is one possible way to mitigate the congestion impacts of new development. As such, we request that the concept of a mitigation fee be evaluated as an alternative to the project.

We note on page 2 of the NOP that CMP staff is currently engaged in a feasibility study regarding various approaches to address future congestion. It will be very difficult to determine the impact upon local government unless a specific approach or alternative approaches are described and evaluated. Since the legislation requires mitigation of congestion caused by development, it is possible that an inadequate approach would result in a slowdown in development activity in impacted areas. This could result in a substantial alteration of the present and planned land use of Long Beach, and therefore "yes" should be checked under land use impacts. We request that the DEIR evaluate the specific impacts to the Long Beach Land Use Element of the General Plan and the Downtown Redevelopment Plan. Without adequate mitigation, the CMP has a significant potential to stop development and in turn negate the goals and objectives of our development plans. We request that these impacts be reviewed and evaluated in the DEIR.

In the same manner, the CMP could cause a redistribution of housing and area population through a prohibition of new development in impacted areas. We therefore request that "yes" be checked for both Population and Housing and that these categories be evaluated for impacts on both a regional and a municipal basis.

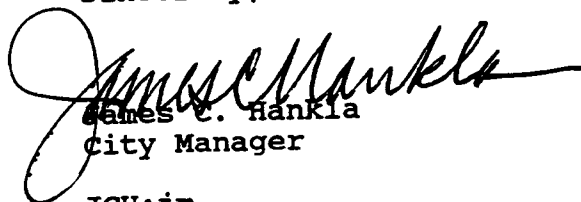
Kendra Morries
June 26, 1992
Page 2

Finally, we request that the DEIR evaluate the negative fiscal impacts and the resultant effect upon municipal services which could occur if implementation of our Land Use and Redevelopment Plans are retarded due to an inadequate congestion mitigation program.

In summary, we believe that the above cited "worst case" impacts upon local government must be discussed unless the congestion management program is described in sufficient detail and is evaluated to demonstrate that it will fully meet the congestion mitigation mandates of state law.

Please be so kind as to send this office a copy of the DEIR.

Sincerely,


James C. Hankla
City Manager

JCH:jm

KD142
NOP



**South Coast
AIR QUALITY MANAGEMENT DISTRICT**

21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (714) 396-2000

MICROFILMED
COPY IN RMC

219037

June 26, 1992

Ms. Kendra Morries
Project Manager
Congestion Management Program
818 West Seventh Street-2200
Los Angeles, CA 90017

Dear Ms. Morries:

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County Congestion Management Program (CMP)

SCAQMD# LAC920508-01

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report (Draft EIR) for the Los Angeles County Congestion Management Program. SCAQMD is responsible for adopting, implementing, and enforcing air quality regulations in the South Coast Air Quality Management District, which includes the project location. As a responsible agency, SCAQMD reviews and analyzes environmental documents for projects that may generate significant adverse air quality impacts. In this capacity, SCAQMD advises lead agencies in addressing and mitigating the potential adverse air quality impacts caused by projects.

To assist the Lead Agency in the preparation of the air quality analysis for the EIR, the following is a summarization for evaluating air quality impacts.

Baseline Information: Describe the existing climate and air quality of the region and project site location.

Identify and quantify all project **Sources of Emissions**.

Compare and assess anticipated project emissions with the District's **Thresholds of Significance** and the existing air quality of the region and project location.

Identify and assess **Toxic Source Emissions** at the project location.

Assess **Cumulative Air Quality Impacts** from related projects.

Assess **Consistency of the Congestion Management Program** with the AQMP.

Identify and quantify **Project Alternatives** that may attain the goals of the project with substantially fewer or less significant impacts.

Identify Mitigation Measures necessary to reduce air quality impacts.

Assess the CO impacts for the level of service established in the CMP, compared to the District's CO plan submitted to EPA.

For additional information please refer to SCAQMD's Air Quality Handbook for Preparing Environmental Impact Reports to assess and mitigate adverse air quality impacts. District staff is available to participate in any scoping meetings you may have to provide guidance in the development of the environmental analysis.

SCAQMD has a prescribed role in the development and implementation of the CMP. In accordance with State CMP legislation (Section 65089.3(C)), SCAQMD is assigned the responsibility of establishing and periodically revising a list of improvements, programs, and actions which local agencies can select from to address CMP deficiencies. Legislation also requires the lead agency to consult with the District during the preparation of the CMP. In addition, if any trips are exempt from the modeling analysis, then consultation with the District is required.

All elements of the CMP should be consistent with the Air Quality Management Plan (AQMP). In particular, the CMP should be consistent with the growth forecast used in the AQMP and should implement all AQMP transportation control measures (TCMs). As you are aware, the deficiency plan of the CMP should include actions that go beyond AQMP programs and actions. This can be accomplished by accelerating AQMP TCMs and adopting more stringent TCMs than those identified in the AQMP or measures that are not identified in the AQMP. CMP legislation specifically states that deficiency plans must result in a significant benefit to air quality. District Staff has appreciated working with LACTC on developing a deficiency plan.

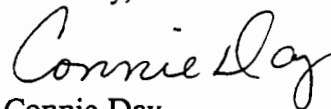
Upon completion of the Draft Environmental Impact Report, please forward two copies to:

Office of Planning & Rules
South Coast Air Quality Management District
21865 Copley Drive
P O Box 4939
Diamond Bar CA 91765-0939

Attn: Local Government - CEQA

If you have questions regarding the environmental analysis, please call me at (714) 396-3055. If you have questions regarding the review of the CMP or deficiency plan, please call Alene Taber at (714) 396-3057.

Sincerely,



Connie Day
Program Supervisor
Local Government - CEQA

CAD:gb
(cmpnop)



MICROFILMED
COPY IN RMC

CITY OF LONG BEACH

DEPARTMENT OF PLANNING & BUILDING

333 WEST OCEAN BLVD. • LONG BEACH, CALIFORNIA 90802

(310) 590-6458

Community & Environmental Planning Division

June 24, 1992

218395

Kendra Morries
Project Manager
Congestion Management Program
818 W. Seventh Street-2200
Los Angeles, CA 90017

Subject: Revised Notice of Preparation
Draft Environmental Impact Report
Congestion Management Program for
Los Angeles County

We appreciate the opportunity to review the revised documents. Our comments principally concern the lack of mitigation fee in the CMP. We understand that staff is currently engaged in a planning and feasibility study regarding various approaches to address future congestion. Without inclusion of a mitigation fee, it will be very difficult to determine the impact upon local government since the alternative will be reduced or no development.

We strongly recommend that a mitigation fee be addressed as an alternative to the project.

We suggest that the Initial Study be changed to "yes" for 8) Land Use, 11) Population and 12) Housing.

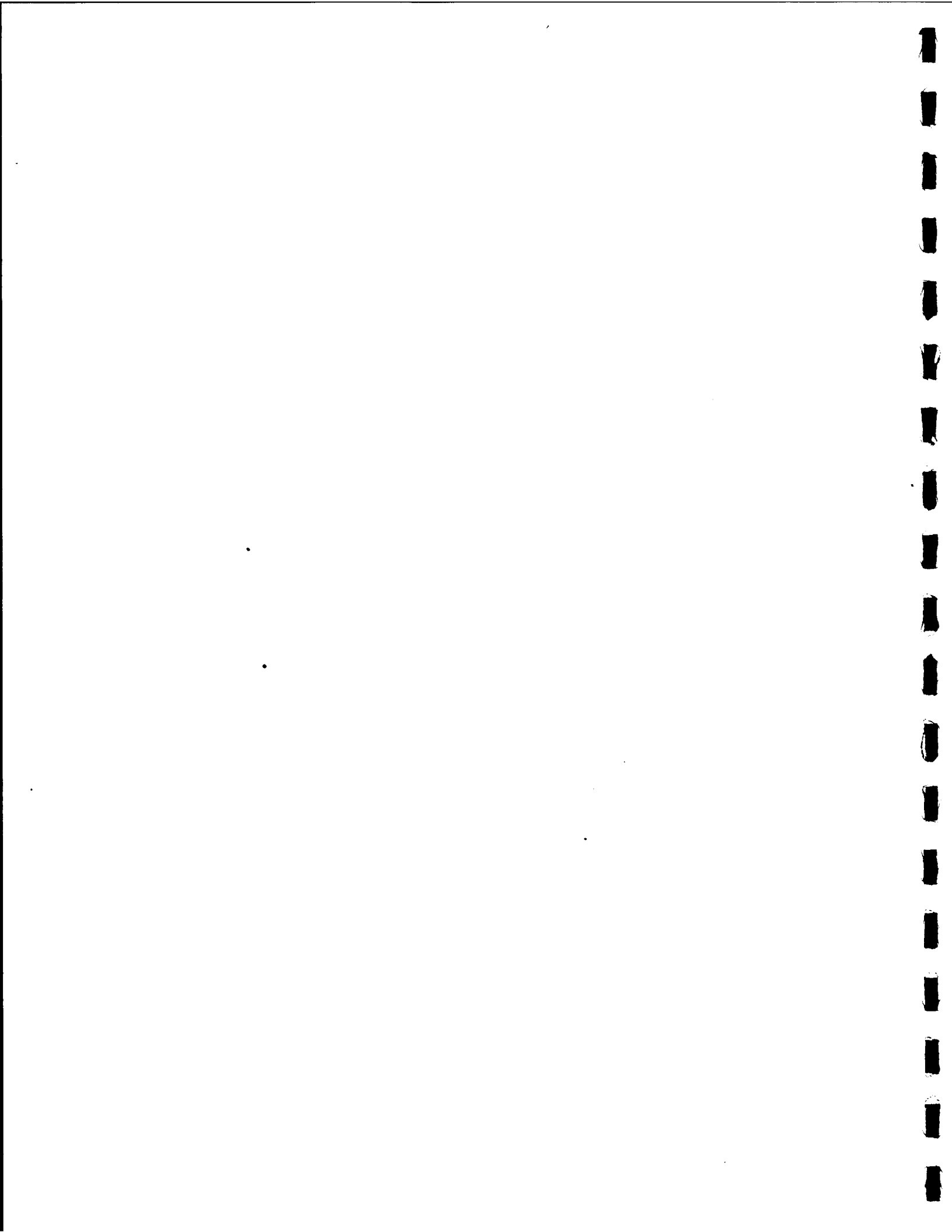
Without a mitigation fee -- development will be stopped, thus causing significant impacts to land use, population and housing distribution.

Sincerely,



Gerhardt H. Felgemaker
Environmental Planning Officer

GHF:jm



GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
CC: See Attached List
1400 TENTH STREET
SACRAMENTO, CA 95814



RECEIVED
JUN 22 11 12 57

DATE: Jun 18, 1992
TO: Reviewing Agency
RE: LOS ANGELES COUNTY TRANSPORTATION COMMISSION's NOP for
CONGESTION MANAGEMENT PROGRAM FOR LOS ANGELES COUNTY
SCH # 91121063

Attached for your comment is the LOS ANGELES COUNTY TRANSPORTATION COMMISSION Notice of Preparation of a draft Environmental Impact Report (EIR) for the CONGESTION MANAGEMENT PROGRAM FOR LOS ANGELES COUNTY.

Responsible agencies must transmit their concerns and comments on the scope and content of the EIR, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of this notice. We encourage commenting agencies to respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

KENDRA MORRIES
LOS ANGELES COUNTY TRANSPORTATION COMMISSION
818 WEST SEVENTH ST., STE 2200
LOS ANGELES, CA 90017

with a copy to the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the review process, call Tom Loftus at (916) 445-0613.

Sincerely,

Christine Kinne
Acting Deputy Director, Permit Assistance

Attachments

cc: Lead Agency

S = sent by lead agency

X = sent by SCH

Resources Agency

- Judy Carpenter
Dept. of Boating & Waterways
1629 S Street
Sacramento, CA 95814
916/445-6281
- Gary L. Holloway
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219
415/904-5200
- Reed Holderman
State Coastal Conservancy
1330 Broadway, Suite 1100
Oakland, CA 94612
510/464-1015
- Steve Ollva
Dept. of Conservation
1416 Ninth Street, Room 1326-2
Sacramento, CA 95814
916/445-8733
- Div. of Mines and Geology
- Div. of Oil and Gas
- Land Resources Protect. Unit
- Douglas Wickizer
Dept. of Forestry
1416 Ninth Street, Room 1516-2
Sacramento, CA 95814
916/653-9451
- Hans Kreutzberg
Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001
916/653-9107
- Mike Doyle
Dept. of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001
916/653-0547
- Anna Leena Bronson
Reclamation Board
1416 Ninth Street Room 706
Sacramento, CA 95814
916/653-9669
- Nancy Wakeman
S.F. Bay Conservation & Dev't. Comm.
30 Van Ness Avenue, Room 2011
San Francisco, CA 94102
415/557-3686
- Nadell Gayou
Dept. of Water Resources
1416 Ninth Street, Room 449
Sacramento, CA 95814
916/653-6866

Fish and Game - Regional Offices

- Gary Stacey, Regional Manager
Department of Fish & Game
601 Locust
Redding, CA 96001
916/225-2300 (8-442)
- Jim Messersmith, Regional Manager
Department of Fish & Game
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670
916/355-0922 (8-438)
- B. Hunter, Regional Manager
Department of Fish and Game
P.O. Box 47
Yountville, CA 94599
707/944-5518
- G. Nokes, Regional Manager
Department of Fish and Game
1234 East Shaw Avenue
Fresno, CA 93710
209/222-3761 (8-421)
- Fred A. Worthley, Jr., Reg. Manager
Department of Fish and Game
330 Golden Shore, Suite 50
Long Beach, CA 90802
213/590-5113 (8-635)

Independent Commissions

- John R. Nuffer
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814
916/654-3859
- William A. Johnson
Native American Heritage Comm.
915 Capitol Mall, Room 288
Sacramento, CA 95814
916/653-4082
- William Meyer
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
415/703-1540 (8-597)
- Betty Eubanks
State Lands Commission
1807 - 13th Street
Sacramento, CA 95814
916/322-2795

Business, Transportation, & Housing

- Sandy Heanard
Caltrans - Division of Aeronautics
P.O. Box 942874
Sacramento, CA 94274-0001
916/324-1833
- Tom Micone
California Highway Patrol
Office of Special Projects
Planning and Analysis Division
2555 First Avenue
Sacramento, CA 95818
916/437-7222
- Ron Helgason
Caltrans - Planning
P.O. Box 942874
Sacramento, CA 94274-0001
916/445-5570

Department of Transportation
District Contacts

- Guy Luther
Caltrans, District 1
1636 Union Street
Eureka, CA 95501
707/445-6407
- Michelle Gallagher
Caltrans, District 2
P.O. Box 494040
Redding, CA 96049-4040
916/225-3259 (8-442)
- Jody Lonergan
Caltrans, District 3
703 B Street
Marysville, CA 95901
916/741-4277 (8-457)
- Gary S. Adams
Caltrans, District 4
P.O. Box 7310
San Francisco, CA 94120
415/557-9162 (8-597)
- Wayne Schnell
Caltrans, District 5
P.O. Box 8114
San Luis Obispo, CA 93403-8114
805/549-3683 (8-629)
- Moses Pacheco
Caltrans, District 6
P.O. Box 12616
Fresno, CA 93778
209/276-5989 (8-422)
- Gary McSweeney
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012
213/620-2376 (8-640)
- Harvey Sawyer
Caltrans, District 8
P.O. Box 231
San Bernardino, CA 92402
714/383-4808 (8-670)
- Lisa Flores
Caltrans, District 9
500 South Main Street
Bishop, CA 93514
619/872-0203 (8-627)
- Al Johnson
Caltrans, District 10
P.O. Box 2048
Stockton, CA 95201
209/948-7838 (8-423)
- Milke Owen
Caltrans, District 11
P.O. Box 85406
2829 Juan Street
San Diego, CA 92186-5406
619/688-6750 (8-631)
- Alleen Kennedy
Caltrans, District 12
2501 Pullman St.
Santa Ana, CA 92705
714/724-2239 (8-655)

Food and Agriculture

- Vazhek Cervinka
Dept. of Food and Agriculture
1220 N Street
Sacramento, CA 95814
916/322-5227

Health & Welfare

- Quy Tu
Dept. of Health
714 P Street, Room 692
Sacramento, CA 95814
916/323-6111

DIETSCD: _____

State and Consumer Services

- Robert Sleppy
Dept. of General Services
400 P Street, Suite 5100
Sacramento, CA 95814
916/324-0214

Environmental Affairs

- Barbara Fry
Air Resources Board
1102 Q Street
Sacramento, CA 95814
916/322-8267

- Steve Alt
Calif. Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826
916/322-4235

State Water Resources Control Board

- Allan Patton
State Water Resources Control Board
Division of Clean Water Programs
P.O. Box 944212
Sacramento, CA 94244-2120
916/739-4265
- Dave Berlinger
State Water Resources Control Board
Delta Unit
P.O. Box 2000
Sacramento, CA 95812-2000
916/322-9870
- Phil Zentner
State Water Resources Control Board
Division of Water Quality
P.O. Box 100
Sacramento, CA 95801
916/657-0912
- Mike Falkenstein
State Water Resources Control Board
Division of Water Rights
901 P Street, 3rd Floor
Sacramento, CA 95814
916/657-1377 (8-437)

APCD/AQMD: **SOUTH COAST**

Regional Water Quality Control Board

- NORTH COAST REGION (1)
1440 Guerneville Rd.
Santa Rosa, CA 95401
707/576-2220 (8-590)
- SAN FRANCISCO BAY REGION (2)
2101 Webster, Suite 500
Oakland, CA 94612
415/464-1255 (8-561)
- CENTRAL COAST REGION (3)
81 Higgins Street, Suite 200
San Luis Obispo, CA 93401-5414
805/549-3147 (8-629)
- LOS ANGELES REGION (4)
1075 S. Broadway, Rm. 4027
Los Angeles, CA 90012
213/266-4460 (8-640)
- CENTRAL VALLEY REGION (5)
3443 Roulter Road, Suite A
Sacramento, CA 95827-3098
916/361-5600
- Fresno Branch Office
3614 East Ashlan Avenue
Fresno, CA 93726
209/445-5116 (8-421)
- Redding Branch Office
415 Knollcrest Drive
Redding, CA 96002
916/224-4845 (ATS 441)
- LAHONTAN REGION (6)
2092 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
916/544-3481
- Victorville Branch Office
15428 Civic Drive, Suite 100
Victorville, CA 92392-2359
619/241-6583
- COLORADO RIVER BASIN REGION (7)
73-271 Highway 111, Suite 21
Palm Desert, CA 92260
619/346-7491
- SANTA ANA REGION (8)
2010 Iowa Avenue, Suite 100
Riverside, CA 92507
714/782-4130 (8-632)
- SAN DIEGO REGION (9)
9771 Clairmont Mesa Blvd., Suite B
San Diego, CA 92124-1331
619/265-5114 (8-636)

OTHER: _____

OTHER: _____



818 West Seventh Street, 12th Floor • Los Angeles, California 90017-3435 ☐ (213) 236-1800 • FAX (213) 236-1825

EXECUTIVE COMMITTEE

June 17, 1992

President
Rep., Cities of San Bernardino
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John Longville, Mayor
Rialto

First Vice President
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Second Vice President
Cities of Riverside County
Judy Nieburger, Councilmember
Moreno Valley

Kendra Morries, Project Manager
Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street - 2200
Los Angeles, CA 90017

Past President
Rep., Ventura County
John Flynn, Supervisor

RE: Revised Notice of Preparation of a Draft Environmental Impact
Report and Initial Study
SCAG CLEARINGHOUSE # LA-55791-MT

Los Angeles County
Mike Antonovich, Supervisor
Deane Dana, Supervisor

Orange County
Harriett Wieder, Supervisor

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Jon Mikels, Supervisor

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Cities of Ventura County
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Santa Paula

City of Los Angeles
Tom Bradley, Mayor
Mark Ridley-Thomas,
Councilmember
Hal Bernson, Councilmember

Dear Ms. Morries:

We have concluded review of the above project and determined that it is regionally significant. Enclosed you will find a copy of our general requirements for environmental documents being prepared for regionally significant projects. The EIR should also address conformity with the South Coast Air Quality Management Plan (AQMP) using procedures included in the Guidance for Implementation of AQMP Conformity Procedures.

City of Long Beach
Clarence Smith, Councilmember

A description of the project was published in the June 15 Semi-Monthly Intergovernmental Review Listing for public review and comment.

POLICY COMMITTEE CHAIRS

Hal Croys, Mayor Pro Tem
Lomita; Chair, Transportation
and Communications

The project title and SCAG number should be used in all correspondence with SCAG concerning this project. Correspondence should be sent to the Clearinghouse Coordinator. When additional documents are sent to SCAG, please provide three copies so that the project is generated to the respective analysts. If you have any questions, please contact Mike Ouellett (213) 236-1886.

Diann Ring, Mayor Pro Tem
Claremont; Chair, Energy
and Environment

Scott Garrett, Vice Mayor
Hemet; Chair, Community,
Economic, and Human
Development

Sincerely,

ERIC H. ROTH
Manager, Intergovernmental Review

AT-LARGE DELEGATES

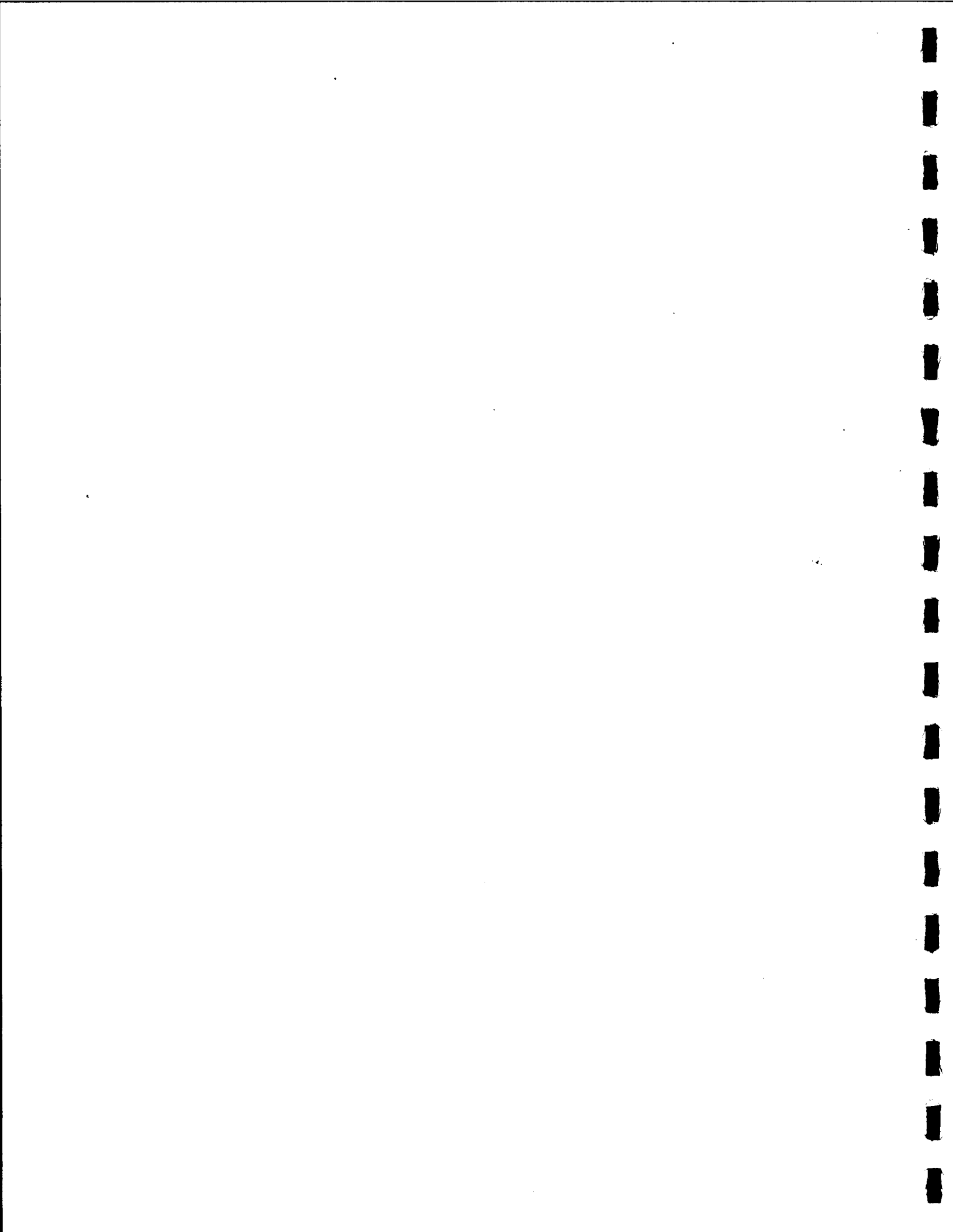
Robert Lewis, Mayor
Thousand Oaks

Fred Aguiar, Mayor
Chino

Richard Kelly, Mayor
Palm Desert

ALTERNATES

Imperial County o Sam Sharp, Supervisor • Los Angeles County o Ed Edelman, Supervisor and Kenneth Hahn, Supervisor • Orange County o Gaddi Vasquez, Supervisor • Riverside County o Meiba Dunlap, Supervisor • San Bernardino County o Larry Walker, Supervisor • Ventura County o Vicky Howard, Supervisor • Cities of Imperial County o Victor Sanchez, Jr., Mayor Pro Tem, Westmorland • Cities of Los Angeles County o Abbe Land, Councilmember, West Hollywood • Cities of Orange County o Ruthelyn Plummer, Councilmember, Newport Beach • Cities of Riverside County o (Vacant) • Cities of San Bernardino County o Elmer Digneo, Mayor Pro Tem, Loma Linda • Cities of Ventura County o Judy Mikels, Councilmember, Simi Valley • City of Los Angeles o Richard Alatorre, Councilmember o Rita Walters, Councilmember o Michael Woo, Councilmember • Long Beach 2nd position o Douglas Drummond, Councilmember • At Large o George Nakano, Councilmember, Torrance o Candace Haggard, Councilmember, San Clemente o Judy Wright, Councilmember, Claremont • Ex-Officio o Judith Johnston-Weston, Los Angeles; Chair, Regional Advisory Council



**ENVIRONMENTAL DOCUMENTATION AND REVIEW
GENERAL REQUIREMENTS
for
NEGATIVE DECLARATIONS, MITIGATED NEGATIVE DECLARATIONS,
NOTICES OF PREPARATION, ENVIRONMENTAL IMPACT REPORTS, ENVIRONMENTAL
ASSESSMENTS, AND RELATED DOCUMENTS**

The general requirements for the review of regionally significant projects are based on the disclosure of information, identification of impacts and a program for their mitigation, as required under CEQA. The requirements used presently by SCAG are revised as shown below to provide for the adoption of the Growth Management Plan, Regional Mobility Plan, and Air Quality Management Plan. (Revised November 1, 1989)

If any proposed project(s) will or could cause environmental impacts, such impacts must be consistent with the forecasts included in the Growth Management Plan and the Regional Mobility Plan (approved in February 1989) and the Air Quality Management Plan (approved in March 1989).

The relationships of the forecasts and policies mentioned above must be addressed and evaluated wherever applicable. Therefore, all of the documents listed above and other such studies and reports should address the issues below. (Not all issues will apply to every project.)

1. **What are the impacts of the proposed project on population, employment, and housing? Give the growth forecast for each phase of the project, if phased.**
2. **Are the growth management goals and policies complied with?**
3. **Are the Jobs/Housing Balance performance goals being met?**
4. **Is housing availability discussed in terms of the income and wage levels of the local workforce?**
5. **What will be the cumulative impacts of the project in the subregion? How is this related to the Growth Management Plan forecast at the expected date of project completion or phase completion?**
6. **Are the provisions of the Air Quality Management Plan implemented at the local level and within the subregion? What are the air quality impacts of the projects? Are they being addressed?**
7. **For any project with transportation corridor-level impacts, what are the long-term impacts?**
8. **What assumptions are used in estimating the total trips generated by the project?**
9. **What are the related vehicular emissions?**

10. What is the annual impact on total trips generated by this project?
11. Discuss the transportation demand management program chosen for the project. Will mass transit, ridesharing, and other trip-reduction strategies be promoted? Quantify the effects of each component of these programs. Provide an implementation schedule for each component. Identify the person or agency responsible for monitoring and administering the program. Who will operate the program? How will the program be funded?
12. Does the project impact a highway, either directly or indirectly? Does it include a highway in a mitigation measure? If so:
The document must state where the project includes High Occupancy Vehicles (HOV), transitway, and/or mixed-flow improvements;
It must state how mitigation measures will promote the use of HOVs, transitway, and/or mixed-flow improvement;
It must state whether the highway improvement is included in the Caltrans District Service Management Plan.
13. Transportation improvements/projects must adhere to the following criteria:
The impact of the overall project on air quality in the long term must be analyzed on a transportation corridor level, even if the project is phased or incrementally developed. The impact of the project on air quality must be compared with the impacts of the project alternatives, on a transportation corridor level. The alternatives must also be compared with each other.
The demand management strategies, HOV improvements, and transit are required to be evaluated as alternatives (and as mitigation measures if necessary.)
14. **ALL PROJECTS MUST STATE THE FOLLOWING:**
 - Whether they are included in the Regional Transportation Improvement Program;
 - Whether they are consistent with local planning documents;
 - Whether they are identified as constrained or unconstrained in the Regional Mobility Plan;
 - Whether they are consistent with the specific policy elements of the Regional Mobility Plan, Section IV.
15. What are the impacts (if any) of the project on:
Water,
Wastewater treatment,
Solid and hazardous waste,
Energy,
School facilities?

Environmental documents will be reviewed by SCAG at the appropriate time within the public review period, or under public hearing procedures.

Please send three copies of the documents when they are ready for distribution.

**FOR ADDITIONAL INFORMATION, PLEASE CALL
THE SCAG CLEARINGHOUSE
(213) 236-1800**

DEPARTMENT OF FISH AND GAME
330 Golden Shore, Suite 50
Long Beach, California 90802
(310) 590-5113

L.A.C.T.C.

1992 FEB -7 AM 11:47

MICROFILMED
COPY IN RMC
207041

February 6, 1992

Mr. Bradford McAllester
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, California 90017

Dear Mr. McAllester:

Notice of Preparation for Congestion Management Program for
Los Angeles County - SCH 91121063

To enable our staff to adequately review and comment on subject project, we recommend the following information be included in the Draft Environmental Impact Report:

1. A complete assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened and locally unique species and sensitive and critical habitats.
2. A discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts.
3. A discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or urban pollutants on streams and watercourses on or near the project site, with mitigation measures proposed to alleviate such impacts. Stream buffer areas and maintenance in their natural condition through non-structural flood control methods should also be considered in order to continue their high value as wildlife corridors.

More generally, there should be discussion of alternatives to not only minimize adverse impacts to wildlife, but to include direct benefit to wildlife and wildlife habitat. Those discussions should consider the Department of Fish and Game's policy that there should be no net loss of wetland acreage or habitat values. We oppose projects which do not provide adequate mitigation for such losses.

Mr. Bradford McAllester
February 6, 1992
Page Two

Diversion, obstruction of the natural flow, or changes in the bed, channel, or bank of any river, stream, or lake will require notification to the Department of Fish and Game as called for in the Fish and Game Code. Notification should be made after the project is approved by the lead agency.

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact Ms. Kim McKee at (310) 590-5137.

Sincerely,

Fred Worthley
Fred Worthley
Regional Manager
Region 5

cc: Office of Planning & Research



CENTRAL CITY ASSOCIATION
OF LOS ANGELES

February 3, 1992

Mr. Brad McAllester
Administrator, Congestion Management Program
Los Angeles County Transportation Commission
818 West 7th Street
Suite 1100
Los Angeles, CA 90017

RE: Congestion Management Program for Los Angeles County

Dear Mr. McAllester:

CCA represents a number of downtown business interests which are deeply committed to improving mobility and air quality in Los Angeles County through a regulatory framework which permits responsible growth. However, we feel the CMP must ensure that local jurisdictions, developers and the business community at large are afforded the flexibility needed to adopt these transportation congestion measures. In addition, the development community cannot bear a disproportionate burden of repairing and expanding the County's regional transportation infrastructure. The development community cannot be asked to pay duplicate fees and impose inconsistent mitigation through conflicting approval processes. We have reviewed the August 14, 1991 Final Draft of the Congestion Management Program for Los Angeles and have the following concerns which we believe have not been adequately addressed.

1. The LACTC should be required to do an economic study in conjunction with the EIR to evaluate the socio-economic impacts of the CMP. Given current economic conditions, failure to identify economic impacts would result in a seriously deficient plan.
2. CCA supports the SCAQMD's goals to reduce work and non-work related automobile vehicle trips through the adoption of Regulation XV. As you know, it is too early to tell whether the implementation of trip reduction strategies for employers of 100 employees or more is actually reducing AVR levels and therefore, whether it is necessary and beneficial to extend it to employers of 99 employees and below. The language contained in Section 6.3.1 on page (36) of the CMP unequivocally states that "Regulation XV requirements shall apply to all employers and is reaffirmed by the CMP." We

TDM

page 2

Mr. Brad McAllester
February 3, 1992

believe that the SCAQMD should act as the regional authority and develop a coordinated, uniform and regional approach to trip reduction, rather than impose a fragmented approach to transportation demand management. We believe the SCAQMD must analyze the cost to businesses, and the effectiveness of Regulation XV on AVR reduction before extending its terms. We urge you to define more clearly the roles and responsibilities of the SCAQMD, the LACTC and local jurisdiction in regulating trip reduction.

TDM

3. On page (13) of your policy statements, it is essential that a policy statement be added to state, "LACTC will work closely with the business community in implementing the CMP and work to ensure the expansion of jobs, housing and economic development throughout the region."
4. On page (36), an extensive list of TDM Strategies are identified to reduce trips. Is this list comprehensive? Are they effective? In other words, do we know that these strategies produce the desired results?
5. On page (37), building owners are required to advise tenants of TDM-related activities through their lease terms. There should be one consistent and uniform survey required for building owners. Otherwise a building owner can potentially be required to gather and disseminate TDM information to tenants in a building under overlapping regulations by AQMD's Regulation XV, the City of Los Angeles and LACTC. The lease, as a vehicle for TDM education should be re-evaluated.
6. On page (44), the CMP suggests that the county-wide mitigation fee is a desired alternative for both local government and the development industry. CCA's developer members oppose this proposed fee. It is fundamentally unfair to place the burden of repairing our regional transportation infrastructure solely on new development. The current congestion on the County's system is partly the result of population and trip increases and partly the consequence of past failures to finance and construct the infrastructure required to keep pace with growth. To require new development to fund the expansion of the County's transportation infrastructure imposes a burden on new development that exceeds its impact on the CMP network. A fee should only be charged to new development under the CMP if a project is demonstrated to impact the CMP network, contribute to a deficiency in the network, or that a deficiency exists or will be created.

TDM

TDM

page 3
Mr. Brad McAllester
February 3, 1992

7. The CMP's requirements impose a regional mitigation fee without providing any mechanism for the developer to demonstrate that a project actually impacts the CMP network. The CMP should allow private developers the flexibility to contribute to regionally significant infrastructure improvements outlined in a Deficiency Plan and receive credit against an otherwise assessed mitigation fee.
8. Local jurisdictions must have the flexibility to administer and allocate the fees in a manner that will encourage local growth. The CMP is unclear as to the manner in which the fees will be distributed and improvements funded. The CMP must ensure that local fees are not imposed on developers that overlap or duplicate with the CMP mitigation fees.
9. On page (45), "the impact of trips on the CMP system in the immediate area will be analyzed using a five mile radius for the CMP arterial and freeway monitoring locations." How is a 5 mile radius determined?
10. On page (13) Section 7.2.3 of the CMP, the objectives of the land use/transportation impact analysis program is to "establish a program which can be integrated into existing local review processes, with minimal additional burden placed on public and private entities". It is essential that mitigation requirements imposed on development under the CMP are consistent with requirements of local jurisdictions.
11. On page (49), Section 7.4, the provision states that deficiency plans must exceed those control measures included in the 1991 AQMD or accelerate implementation of such measures. There is nothing in the CMP legislation that requires that a deficiency plan go beyond the measures contained in the AQMD. What is the LACTC's authority?
12. On page (9), it is stated that transit operators will be consulted during the development and implementation of the CMP. We are concerned that this additional review will further delay and add costs to development projects. Transit operators currently have the opportunity to review projects through the CEQA process. This requirement is duplicative and unnecessary. LACTC must develop a regional transportation model and database for the CMP that will be consistent with those databases and models used by local jurisdictions.

TRANSIT

Page 4
Mr. Brad McAllester
February 3, 1992

The CMP must be uniform, consistent and equitable. New development cannot bear the burden alone. CCA applauds the CMP's objectives and recognizes that congestion relief is essential to ensure the economic vitality of the state and improved quality of life in communities throughout the region. We look forward to working with you on these important transportation, land use, and air quality issues prior to the CMP's adoption.

Sincerely,



Donald F. McIntyre
President & CEO

DFM/lk

THE CITY OF
POMONA

Public Works Department

ROBERT A. DELOACH
Director

206188



January 27, 1992

Mr. Brad McAllester
Manager, Congestion Management Program
LOS ANGELES COUNTY
TRANSPORTATION COMMISSION
818 West Seventh Street; Suite 1100
Los Angeles, CA 90017

**Subject: Response to Notice of Preparation of a Draft
Environmental Impact Report**

Dear Brad:

I am in receipt of your Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Congestion Management Program (CMP) for Los Angeles County.

After thorough review, our office will offer no comment at this time as this document is consistent with previous communications concerning the CMP.

I have forwarded a copy of this document to our Redevelopment Agency and our Community Development Department for their review.

Respectfully,

Robert A. DeLoach
Director of Public Works

cc: Director of Redevelopment
Director of Development

RAD:bmt042



DEPARTMENT OF TRANSPORTATION

DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012
(213) 897-3656



January 24, 1992

206014

County of Los Angeles
IGR/CEQA/NOP- Congestion
Management Program For Los
Angeles County
Vic LA-COUNTY-WIDE
SCH # 91121063

Mr. Bradford McAllester
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Dear Mr. McAllester:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. Items which should be covered for the project include, but are not limited to:

- A. Trip generation/distribution including the method used to develop the percentages and assignment.
- B. ADT, AM and PM peak-hour volumes for both the existing and future (Year 2010) conditions. This should include State facilities (Freeways and Highways) and all significantly affected ramps, streets, crossroads and controlling intersections, as well as an analysis of existing and future conditions on mainlines (Freeways and Highways).
- C. An analysis of future (Year 2010) conditions which include project traffic and the cumulative traffic generated for all approved developments in the area.
- D. Consideration should be given to providing mitigation for congestion relief. Any mitigation proposed should be fully discussed in the document. These discussions should include, but not be limited to, the following:
 - * financing
 - * scheduling considerations
 - * implementation responsibilities
 - * monitoring
- E. Consideration should be given to requiring developer contributions or fair-share funding for transportation improvements on State facilities.

Mr. Bradford McAllester
Page Two
January 24, 1992

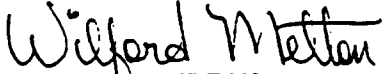
- f. The land use analysis requirements should include assurances that local jurisdictions consider transportation and land use impacts of new developments on the mainline regional freeway system.
- g. The CMP Transportation Impact Analysis Program and Deficiency Plan should include all State (Freeways and Highways) and an identification of deficiencies below the established level-of-service standards.
- h. Proposed Flexible Congestion Relief (FCR) and Transportation System Management (TSM) and High Occupancy Vehicle (HOV) projects are to be coordinated with Caltrans.

We look forward to reviewing the DEIR. We expect to receive a copy from the State Clearinghouse. However, to expedite the review process, you may send two copies in advance to the undersigned at the following address:

Wilford Melton
District 7 IGR\CEQA Coordinator
Advance Planning Branch
120 So. Spring Street
Los Angeles, CA 90012

Thank you for this opportunity to comment. If you have any questions regarding these comments, please call me at (213) 897-1338.

Sincerely,


WILFORD MELTON
IGR\CEQA Coordinator
Advance Planning Branch

cc: State Clearinghouse

23920 Valencia Blvd.
Suite 300
City of Santa Clarita
California 91355

Phone
(805) 259-2489
Fax
(805) 259-8125



205318

JAN 27 1992

MICHAEL

City of
Santa Clarita

January 24, 1992

Mr. Brad W. McAllester
Administrator, Congestion Management Program
Los Angeles County
Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, California 90017

RE: CMP: Notice of Preparation of a Draft Environmental Impact
Report

Dear Mr. McAllester:

Thank you for offering us the opportunity to comment on the
Notice of Preparation of a Draft Environmental Impact Report
for the Congestion Management Program, and we look forward to
commenting on the DEIR once it is completed. At this time, we
have identified the following concerns:

1. To date, no information has been distributed regarding the
dollar amount that will be raised via mitigation fees, how
these fees will be apportioned within the region, and the fee
to be paid by individual developments to mitigate project
impacts.
2. Since this is a Tiered EIR drawing on the EIR prepared for
the Regional Mobility Plan (RMP), the RMP-EIR should be an
attachment to the CMP-EIR.
3. The City supports the view that most of the items on the
environmental checklist should be checked "maybe" for
assessing the environmental impact of the CMP program, and
in general, this was done. Specific capital improvement
projects that will be implemented as a result of the CMP
may have substantial environmental impacts, and "no"
responses may not be appropriate. For instance, in 1a
(Earth), the LACTC indicates that the project will not
cause unstable earth conditions or changes in geologic

Mr. Brad McAllester
January 24, 1992
Page two

substructures, yet "maybe" was checked for every other impact in this category. Road improvements may impact geologic substructures and result in unstable earth conditions that require mitigation. Similarly, the "no" responses to 2a, 2b, 2e, 10a, 13c, 13f, 16a, 16b, 16c, 16e, 17a, 17b, 21a, 21b, and 21d should have the "no" responses changed to "maybe." The revised responses should then be appropriately addressed in the DEIR.

4. The City believes Sierra Highway and the Old Road should be added to the network because both roads are parallel to existing freeways. The Old Road is adjacent to the Golden State Freeway (I-5), and Sierra Highway parallels the Antelope Valley Freeway (R-14). Both of the existing freeways are congested, and the Old Road and Sierra Highway could provide relief if additional funding was provided to improve them. The criteria for defining the network should be addressed in the DEIR.
5. The DEIR should fully address the impacts of pending, approved, and recorded development (including residential, commercial, and industrial projects) within the incorporated and unincorporated areas.
6. The DEIR should include a complete list of capital projects that could be funded with future CMP mitigation fees.

Thank you again for the opportunity to comment on the Notice of Preparation for the CMP-EIR. If you have any questions or comments on this letter, please contact Kevin Michel at (805) 255-4351.

Sincerely,



Lynn M. Harris
Deputy City Manager/
Community Development

LMH:KJM:jcg:230

City of
West Hollywood



Department of
Transportation

1992 JAN 28 11:37
January 22, 1992

Brad Macallister, Manager
Congestion Management Program
818 West Seventh Street, Suite 1100
Los Angeles, California, 90017

Dear Brad:

I have been out of town for several weeks and just got the opportunity to read your Notice of Preparation (NOP) for a draft environmental impact report for the Congestion Management Program. While I realize that the time for official comment on the NOP has passed, I have one comment worthy of your consideration during the environmental review.

The EIR is supposed to review what will actually happen as the result of your program, not what would happen if the CMP were to achieve all its goals. And while I understand that the goal of the CMP is to reduce congestion and improve air quality, it is entirely possible that the program could actually have an opposite effect.

To the extent that the CMP mandates and achieves improved level of service on regional arterials, it could be a direct incentive for people to make longer regional trips. If you do not, at the same time, include equally powerful improvements to local mobility in the plan, the net effect will be to decentralize the urban area.

For this reason, the CMP could have the potential to achieve short-term (reduced congestion on state highways) goals to the disadvantage of long-term (improved jobs/housing balance, reduction of vehicle miles traveled) goals. Besides checking "maybe" for questions involving, land use, transportation and circulation, population and housing, you might consider the possibility that a "maybe" is the best answer for question 21 b. on your form.

Sincerely,


Lucy Dyke
Transportation Manager

LD0043.IW



CITY OF LOS ANGELES
CALIFORNIA



TOM BRADLEY
MAYOR

CITY PLANNING
COMMISSION

—
WILLIAM G. LUDDY
PRESIDENT
THEODORE STEIN, JR.
VICE-PRESIDENT
LYDIA H. KENNARD
SUZETTE NEIMAN
FERNANDO TORRES-GIL

—
RAMONA HARO
SECRETARY

—
(213) 485-5071

DEPARTMENT OF
CITY PLANNING
ROOM 561, CITY HALL
200 N. SPRING ST.
LOS ANGELES, CA 90012-4801

—
MELANIE S. FALLON
DIRECTOR

FRANKLIN P. EBERHARD
CHIEF DEPUTY DIRECTOR
(213) 237-1986

R. ANN SIRACUSA
DEPUTY DIRECTOR

ROBERT H. SUTTON
DEPUTY DIRECTOR
(213) 237-1818

FAX (213) 237-0552

January 22, 1992

Mr. Neil Peterson
Executive Director
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

ATTN: Mr. Bradford W. McAllester, Administrator.

Dear Mr. Peterson:

REQUEST FOR COMMENTS - NOTICE OF PREPARATION OF A DRAFT
ENVIRONMENTAL IMPACT REPORT FOR THE CONGESTION MANAGEMENT
PROGRAM FOR LOS ANGELES COUNTY

The Department of City Planning Transportation Unit staff has reviewed the Draft Environmental Impact Report (DEIR) for the Congestion Management Program (CMP). We support LACTC's initiative to develop and implement transportation improvements throughout the Los Angeles County and appreciate this opportunity to make comments on this DEIR. Following is a list of concerns and questions that staff would like addressed in the DEIR for the CMP.

We request that separate chapters should be included in the CMP DEIR: 1) socio-economic impacts, and 2) county-wide trip fee nexus study. In regard to the socio-economic impacts, we are concerned about CMP's potentially adverse effects on housing, industry, and employment. The DEIR should demonstrate that CMP will benefit the mobility of all groups by accommodating the trip needs of commuters from low income communities, as well as higher income communities. We suggest that an analysis be prepared on the effect CMP will have on the City's municipal tax-base.

Several important issues should be considered in the Nexus chapter.

- The DEIR must address the potential for CMP imposed mitigations and fees to

CITYWIDE PLANNING DIVISION
221 S. FIGUEROA ST., 4TH FLOOR, LOS ANGELES, CA 90012
(213) 237-0127 (213) 617-9178 FAX (213) 237-0141

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"freeze " growth in all or parts of Los Angeles County.

- An analysis should be prepared to determine the effect of CMP on real estate markets in a broad range of land uses including housing, retail, office, and industrial.
- The CMP DEIR should address the issue of inter-jurisdictional equity.
- The CMP DEIR should describe the mechanisms that will be used to assure that fee-funded transportation improvements are provided within the jurisdictions that contributed the fee revenue.

LAND USE

General

There are some procedural and timing questions concerning the initiation of the background work for the next Regional Mobility Plan (RMP) prepared by the Southern California Association of Governments. This DEIR should demonstrate that the CMP will support the land use patterns promulgated by the RMP and Growth Management Plan as trip mitigation and air quality measures. The land use programs in the CMP DEIR must be consistent with those in the RMP and GMP.

Therefore, the CMP DEIR should begin with empirically based land use information, and not assume that the land use policies in the RMP and GMP have already been achieved. Since the EIR for the RMP was computed, the City of Los Angeles has finished its zoning consistency program. We request that the land use information for the City used in the CMP DEIR be upgraded to include the results of this program.

Housing

The Notice of Preparation (NOP) acknowledges that the CMP must be consistent with the RMP, including the land use patterns in the CMP. Both the RMP and GMP put great emphasis on jobs/housing as a trip mitigation and air quality improvement techniques. On Page V-3 of the RMP regional and local jurisdictions are required to "reduce limitation on housing construction in jobs-rich areas". We have several questions concerning how the City will accomplish this.

- How will the City of Los Angeles stimulate and support affordable housing

Mr. N. Peterson
January 22, 1992
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construction in order to meet state and federal requirements if housing must pay to "mitigate" its trips and pay a proposed CMP trip fee?

- What are the economic impacts of a potential CMP trip fee on housing costs?
- Will the impacts be regressive?
- Which income groups will be affected most?

Growth Limitations

SCAG's GMP does not set out to limit growth, but rather "control" or distribute growth. There are several issues as how this will be achieved in the CMP.

- What are the demographic, economic and legal implications if a City can no longer physically mitigate its impacts on the CMP network and the market can no longer bear the cost of trip fees for new development?
- When will the market (retail, office, residential) no longer be able to absorb the trip fees; will it happen in different cities at different times?
- What are the economic consequences of a CMP induced freeze on new development?
- Which industries, real estate markets and employers will be most sensitive to the impact of mitigation fees.
- Which income groups will be affected first?
- Will CMP requirements affect small scale entrepreneurial efforts differently from larger scale investments?

Credits

- How will the DEIR handle the issue of credits (e.g., City of Los Angeles Metro Rail contributions, mixed use developments, mixed use trip fees, Transportation Demand Management, etc.)?
- How will mixed-use developments that keep trips off the CMP network be assured credit?

Mr. N. Peterson
January 22, 1992
Page 4

- How will mixed use projects be encouraged within the CMP?

Population

What groups (income, age, ethnicity) will be most affected by CMP's growth limiting effects?

Public Services

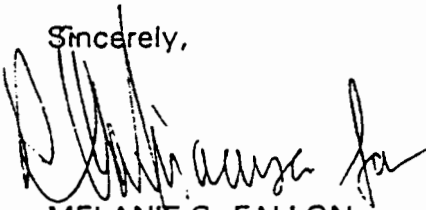
The following excerpt is from the RMP Page V-20 "Local streets and roads are the ultimate link in the transportation system. They provide the primary land use access function, and constitute the collector and distribution system for nearly all modes. They also provide important thoroughfare. Nearly half of all vehicle trips are made entirely on the local street and road system. Local streets and roads are suffering from inadequate funding and consequently poor maintenance." (Emphasis added).

- Will responding to CMP imposed regulations and fees designed to improve the regional system further compromise local jurisdictional efforts to financially sustain their own street networks?
- Will supporting more funding for regional systems encourage longer, regional trips, and more bifurcated land use patterns, rather than more localized, self-sustaining land use patterns?

We request that the Draft Environmental Impact Report (DEIR) address the above referenced issues and comments.

Thank you for the opportunity to respond the DEIR and for considering our input. If you have any further questions, please contact Ms. Lynn Harper at (213) 237-0133.

Sincerely,



MELANIE S. FALLON
Director of Planning

MSF:LH:mw
a:cmpdeir

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
ENVIRONMENTAL AFFAIRS

LILLIAN Y. KAWASAKI
GENERAL MANAGER

200 N. SPRING ST.
ROOM 1800, MS 177
LOS ANGELES, CA 90012
(213) 237-0462



TOM BRADLEY
MAYOR
January 22, 1992

ENVIRONMENTAL AFFAIRS
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BARBARA MIYAMOTO
JILL L. RATNER

Neil Peterson, Executive Director
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

FILE COPY

Dear Mr. Peterson:

I am writing on behalf of the City of Los Angeles in response to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) on the Congestion Management Program (CMP) for Los Angeles County. A number of City departments and bureaus, including the Bureaus of Engineering and Sanitation, the Department of Transportation, the Housing Production and Preservation Department, the Office of the Chief Legislative Analyst, the Harbor Department, and the Environmental Affairs Department, have reviewed your NOP and have the following comments:

General Comments

The Los Angeles County Transportation Commission (LACTC) has proposed to tier the CMP EIR from the EIR for the Regional Mobility Plan (RMP). While the City agrees with this approach, we have two concerns:

- the RMP is currently being updated by the Southern California Association of Governments (SCAG) and will, therefore, differ from the RMP EIR being used for the currently proposed CMP EIR - the potential for differences should be addressed;
- CEQA requires that, when adopting a tiering approach, the lead agency conduct an initial study to determine what impacts, if any, the project may have that were not considered in the prior EIR. However, the CMP NOP does not clearly identify those environmental areas that may be specifically affected by the CMP, but rather attempts to tier those impacts directly from the RMP EIR. The CMP NOP should independently consider the impacts of the CMP and only thereafter compare these impacts with those addressed in the RMP EIR.

One of the primary concerns of the City of Los Angeles is the impact of the CMP's Land Use Component on the local land use authority of the City. The CMP EIR should address these impacts and the potential environmental impacts that would arise from possible conflicts between land use decisions on a local level and the CMP Land Use Component. Potential impacts as a result of the CMP's possible conflict with the City's General Plan and specifically the Balanced Growth, Transportation, and Infrastructure Elements should also be addressed.

It has been stated that the CMP EIR will be a programmatic EIR. However, considering the specific nature of many of the elements of the CMP, including the Capital Improvement Program and the list of deficiency plan measures, the CMP EIR must be as specific as possible in both its identification of impacts and the measures proposed to mitigate those impacts.

The CMP EIR should also provide a comprehensive analysis of the manner in which the CMP interacts with the variety of regional plans currently in place including the Air Quality Management Plan, the Regional Mobility Plan, and the Growth Management Plan. How does the CMP fit into the hierarchy of these plans?

While the LACTC is the lead agency for the CMP, local governments may be required to act as lead for projects required of them under the CMP. The impact of this burden on local governments should be addressed in the CMP EIR.

It remains unclear how funds will be allocated to the list of projects in the Capital Improvement Program and the Deficiency Plan List. Will funding decisions be prioritized on a cost-effectiveness basis? If so, how will the congestion relief and air quality improvements of projects be quantified? We would recommend that a model be developed to demonstrate the air quality benefits of the congestion relief measures/projects on both the Capital Improvement Program and Deficiency Plan lists. These projects should be prioritized based on the results of such modelling.

Alternatives Analysis

The LACTC is proposing the development of a countywide mitigation fee for new development as a means of mitigating the impacts of that development. Los Angeles is the only county proposing this approach. Therefore, a thorough alternatives analysis of this aspect of the CMP must be included in the CMP EIR.

Also, an alternatives analysis should be conducted on the use of capital improvements, particularly capacity enhancing street and highway projects, as a congestive relief strategy. Capacity enhancements have the potential to result in additional traffic and their related air pollutant emissions with no corresponding decrease in congestion. Alternative means of relieving congestion should be addressed in the CMP EIR.

Socio-Economic Impacts

Under CEQA, the economic and social impacts of the project as they relate to physical changes must be addressed. The CMP, as a programmatic EIR, will cumulatively result in a large number of physical changes and, therefore, we recommend that the LACTC additionally prepare a socio/economic report on the impacts of the CMP with particular attention paid to the Deficiency Plan and Mitigation Fee programs.

The socio/economic report should address the mitigation fee's potential to discourage the construction of housing and the fee's potential impact on disadvantaged income groups. Specifically, the socio/economic report should consider whether and how the fee will act to displace housing and employment from the county and how it will alter housing and employment patterns within the county. Also, the report should address how the costs and benefits of the CMP (with particular attention focused on the mitigation fee) will be distributed, both geographically and economically. Finally, an assessment of the CMP's potential to further slow building and development within Los Angeles County and the multiplier effect that such slowing will have on other segments of the economy should be conducted.

Additional attention in the socio/economic report should be paid to the impact of the CMP on local governments, particularly in the provision of public services (including the provision of affordable housing) and the CMP's potential to disrupt the structure of communities, particularly with regard to the capital improvement program.

Cumulative Impacts

As a programmatic EIR, it is essential that the CMP EIR address the issue of cumulative impacts arising from these projects as well as specific measures for mitigating those impacts. The CMP EIR must also address the cumulative impacts of all of the anticipated individual improvement projects of the CMP even though a number of those projects may individually have EIRs prepared to mitigate their specific impacts.

Secondary Impacts

CEQA requires discussion of secondary impacts and related projects, therefore, the CMP EIR should not only look at the CMP Network, but also at the secondary impacts associated with transportation systems that are not part of the CMP Network.

Specific Comments

EARTH

Items b. and c. should be marked YES since local land use and transportation infrastructure projects that may be part of the CMP will affect these areas.

AIR

Item b. should be marked MAYBE since some transportation improvement projects involve street and/or intersection widening thereby bringing traffic closer to residences and consequently subjecting the residents to objectionable odors from automobiles. Additionally, the potential to uncover noisome contamination during construction should be considered.

The CMP EIR should address the relationship between the CMP and local jurisdiction compliance with the federal Clean Air Act, the California Clean Air Act, and the South Coast Air Quality Management Plan. Further, the air quality benefits of congestion relief should be quantified using verifiable modelling techniques.

PLANT LIFE AND ANIMAL LIFE

The CMP NOP indicates that the RMP EIR identifies a potential "significant risk to rare or endangered species or areas of ecological significance." While the CMP NOP states that the CMP EIR will contain an analysis of CMP projects and their potential to have significant impacts, the City recommends that the LACTC consider a consultation with the U.S. Fish and Wildlife Service under Section 7 of the federal Endangered Species Act as well as with California Department of Fish and Game under the California Endangered Species Act. The potential of the CMP to affect open space must also be addressed.

LAND USE

As stated under General Comments above, the relationship between the CMP Land Use Component and local jurisdiction land use authority must be addressed. Local land use decisions must currently comply with Air Quality Management Plan Conformity criteria. The potential for conflict between these requirements as well as the requirements of the federal and California Clean Air Acts and the CMP should be investigated and assessed.

One of the points that the City of Los Angeles made with regard to the Draft Final CMP in our previous comments to your agency was that the CMP, as currently structured, may force development out of dense areas of the county where congestion is high into areas that are currently less developed and less congested, thereby actually encouraging urban sprawl. The CMP EIR should address the potential impacts of this type of development.

Additionally, the possibility of significant changes in regional housing patterns should be investigated and assessed in the CMP EIR. Also, the potential of capacity enhancements to be growth inducing should be considered.

NATURAL RESOURCES

Item a. should be changed to YES since the construction of CMP related capital improvement projects will increase the rate of gravel and concrete materials in the region.

RISK OF UPSET

Item a. should be marked MAYBE since there is the implication within the discussion section that individual projects under the CMP may have the potential to create a risk of upset. If so, then the CMP as a whole may also have the potential.

Item b. should be marked YES. The construction of capital improvements will create short-term localized interference that could slow emergency vehicle response time.

HOUSING

The City of Los Angeles' Initial Study checklist includes two additional items under Housing that we feel are appropriate and should be addressed in the CMP EIR. The first addresses the effect of the project on rental housing and the second asks whether the project will result in the demolition, relocation, or remodeling of residential, commercial, or industrial buildings or other facilities. The answer to both of these questions for the CMP

is MAYBE and therefore, we recommend that the CMP EIR investigate and assess the effects of the CMP on these areas.

Additionally, the CMP's proposal for countywide trip mitigation fees on development could have substantial impacts on the supply of affordable housing that does not fall below the statutory exemption guidelines. The CMP EIR must consider the effects of the fee on affordable housing.

TRANSPORTATION/CIRCULATION

The CMP will contain rail related transportation improvement projects. The CMP EIR, therefore, should additionally consider the impacts of these projects on passenger and non-passenger rail such as cargo rail as well as impacts to the surface modes such as vehicles, bus, and pedestrian circulation.

Item f. should be marked MAYBE. The construction and operation of transportation projects could create an increase in hazardous conditions around the construction site or from project operation.

UTILITIES

All of the items under this category should be marked MAYBE. As previously indicated in the Initial Study, the CMP may affect land use, population, housing, and transportation circulation patterns. Any alterations in these patterns could result in the need for alterations to the utility system.

The CMP NOP completely fails to consider the impacts of the CMP on the household waste and sewage collection and treatment system. The Bureau of Sanitation of the City of Los Angeles operate, on a daily basis, a large number of trucks and other vehicles in the operation of the City's household waste collection and disposal system and the maintenance of the sewage collection system. Neither in the Public Services nor the Human Health sections of the NOP were the potential impacts on these systems addressed. The City requests that the impact of the CMP on such activities be addressed in the CMP EIR and that any adverse impacts caused by the CMP be addressed and mitigation measures identified.

HUMAN HEALTH

Items a. and b. should be marked MAYBE. Soil and groundwater contamination may be encountered during construction of improvement projects. Exposing contamination, grading on contaminated soil, and disposal of contamination could potentially expose the public to health impacts. These issues should be addressed in the CMP EIR.

MANDATORY FINDINGS OF SIGNIFICANCE

Item a. should be marked MAYBE. Under sections four and five, plant life and animal life, it is stated that the project "could potentially result in the loss of a significant amount of terrestrial habitat" and that "the construction of capital improvement projects, if

Neil Peterson, Executive Director - LACTC
NOP for the Congestion Management Program

January 22, 1992
Page 6

located in areas containing endangered species, could result in reduction in the population of such species." No evidence is provided in the NOP that item a. should be marked NO and therefore, in light of the comments under sections four and five, item a. should be marked MAYBE.

Item d. should be marked MAYBE. It is clear throughout this discussion that the CMP has the potential to affect, both directly and indirectly, human beings through its impact on air quality, its potential to alter land use and traffic circulation patterns, to heighten the risk of upset, and to affect housing, public services, and utility systems.

Thank you for this opportunity to comment. The City of Los Angeles looks forward to working with the LACTC to find equitable solutions to relieving traffic congestion, reducing the emission of air pollutants, and improving the quality of life for all communities within the Los Angeles basin. If you have any questions or comments on this letter, please contact me at (213) 237-0352 or contact Mr. Gary Gero of my staff at (213) 485-9956.

Sincerely,



Lillian Y. Kawasaki
General Manager

cc: Councilmember Nate Holden, Chair
Transportation Committee

Councilmember Hal Bernson, Chair
Planning and Land Use Management Committee

LATHAM & WATKINS

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January 21, 1992

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205043

Mr. Neil Peterson
Executive Director
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, California 90017

Re: Notice of Preparation of the Draft Environmental Impact Report for the Congestion Management Program for Los Angeles County

Dear Mr. Peterson:

We submit the following comments in response to the Notice of Preparation (the "NOP") for the Draft Environmental Impact Report (the "EIR") for the Congestion Management Program for Los Angeles County (the "Draft CMP") on behalf of a number of our clients. We support the efforts of the Los Angeles County Transportation Commission ("LACTC") to create a program that will achieve the goal of relieving congestion on a County-wide basis without unduly disrupting the course of development in the County and, thus, hampering continued economic growth. We offer the following comments and suggestions in an effort to help facilitate successful implementation of the Draft CMP.

A. Economic Impacts of the Proposed Mitigation Fee

A major concern that has been expressed in our previous comments regarding the Draft CMP is that the burden of repairing and expanding the County's regional transportation infrastructure not be placed disproportionately on new development within the County. New development is already subject to substantial fees, exactions and other roadblocks that threaten to strangle economic growth. To require new development to fund the rebuilding and expansion of the County's transportation infrastructure places a burden on new development that far exceeds its impact and could further deter future development within the County.

In addition, as currently drafted, the Draft CMP may impose potentially redundant fees that overlap with local mitigation fees. The Draft CMP does not ensure that traffic mitigation costs paid through a trip fee established by a city or county specific plan will satisfy any fee requirements under the CMP. Furthermore, the Draft CMP does not allow a credit against mitigation fees for the cost of improvements undertaken or funded by the developer in accordance with the CMP. Development projects could be required to undertake significant mitigations that reduce or eliminate project impacts on the CMP network and still be charged a significant regional "mitigation" fee, without any showing of remaining unmitigated impacts. We believe that the imposition on a single development of two or more exactions intended to serve a single purpose would place an inordinate burden on such development.

The potential economic impacts, and resulting demographic and societal impacts, caused by burdening new development in the County with a disproportionate share of the costs of continued economic growth is a major concern. Therefore, we are troubled that the NOP does not propose to analyze the significant economic impacts that may result from the "mitigation" fee proposed in the Draft CMP.

By contrast, the Environmental Impact Report for the Regional Mobility Plan (the "RMP") prepared by the Southern California Association of Governments in October 1988, from which this EIR will be tiered, analyzed the potential impacts to the regional economy and concluded that significant adverse impacts could result to the regional economy due to implementation of RMP programs. In addition, the RMP EIR recommended further study of such economic impacts.

SCAG recognized the potential for widespread economic impacts and determined that such impacts were an appropriate subject for environmental review through the EIR process. SCAG came to this conclusion even though the RMP, as analyzed in the RMP EIR, did not include the imposition of the burdensome mitigation fee now proposed for the CMP. We believe that the economic impacts of the CMP are greatly exacerbated by such a fee and, therefore, believe it is essential that the EIR include an analysis of the potential economic impacts associated with the imposition of a significant new mitigation fee on development.

B. Consistency with Local Requirements

In conjunction with the analysis of potential economic impacts associated with the implementation of the CMP, we ask that LACTC consider the impacts that may be caused by additional overlapping obligations that may be imposed on development by the CMP and local jurisdictions. For instance, while we believe that a traffic study conducted pursuant to the requirements of a local jurisdiction, and the traffic impacts and mitigations identified as a result of that study, should define a

project's obligations under the CMP as well, we do not believe that the Draft CMP ensures this. Therefore, under the provisions of the Draft CMP, duplicative traffic studies may be required and inconsistent analytical methodologies could be applied to a single project by different reviewers.

Such duplicative requirements could further increase the costs of new development, delay environmental processing and add to those burdens already hampering new development. This combination of additional fees and complex and duplicative environmental review will impose substantial burdens on new projects in the County and may tend to discourage continued development and growth.

C. Consistency of Models

In addition, we believe that LACTC must develop a regional transportation model and database for CMP purposes that will be consistent with those databases and models used by local jurisdictions. Developers should not be required to conduct multiple traffic studies or implement or pay for mitigations in connection with CEQA review that would not be recognized under the CMP analysis. Otherwise, inconsistent analyses may result in delays, expense and uncertainty that could threaten the viability of projects.

We have previously suggested that the CMP provide for consistency in data bases and models. However, because the current Draft CMP does not provide for such consistency and additional burdens may therefore be imposed on new development, we believe that a thorough analysis of the economic impacts of its current provisions must be completed in conjunction with the EIR.

D. Conclusion

In conclusion, if new development is forced to carry the burden of relieving County-wide mobility and air quality deficiencies not attributable to such development, we believe that such development will be significantly curtailed, thus threatening the economic growth vital to the region. We believe that an analysis of such economic, and the resulting societal and environmental, impacts is essential to ensure the implementation of the CMP in a manner that will best serve the goal of facilitating continued economic growth in the County.

LATHAM & WATKINS

Los Angeles County Transportation Commission

January 21, 1992

Page 4

We look forward to working with you to address these comments and concerns throughout the environmental review process.

Very truly yours,



Cynthia K. Simons
of LATHAM & WATKINS

cc: Donald P. Baker, Esq.
Lucinda Starrett, Esq.

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

January 21, 1992

TO: Lillian Y. Kawasaki, General Manager
Environmental Affairs Department
Attention: Gary Gero

FROM: Fire Department

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT
REPORT - CONGESTION MANAGEMENT PROGRAM

The Los Angeles County Transportation Commission proposes to implement the Congestion Management Program for the County of Los Angeles. The Congestion Management Program consists of five components to provide a mechanism for examining and mitigating the impact of land use decisions on the regional transportation network, making more effective use of all transportation modes, and developing transportation solutions that will help to improve air quality.

Access for Fire Department apparatus and personnel to all structures and fire hydrants shall be required.

The Operations Control Dispatch Section of the Fire Department shall be notified prior to any projects which would affect Fire Department access to streets, fire hydrants, or structures in order to allow Fire Suppression and Emergency Medical Services to plan alternative routes or contingency plans as needed. Notification is to be made by calling the Operations Control Dispatch Section at (213) 485-6185.

Any necessary improvements to the water system or to the existing fire hydrants due to the Congestion Management Program construction or to any street ending in a cul-de-sac, will be at the applicant's expense.

Ms. Lillian Y. Kawasaki
January 21, 1992
Page 2

For any additional information, please contact our Hydrant Unit,
at (213) 485-5964.

DONALD O. MANNING
Chief Engineer and General Manager



Dal L. Howard, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

DLH:ASM:cec:3140E

cc: Councilman Michael Hernandez, First District
Councilman Joel Wachs, Second District
Councilwoman Joy Picus, Third District
Councilman John Ferraro, Fourth District
Councilman Zev Yaroslavsky, Fifth District
Councilwoman Ruth Galanter, Sixth District
Councilman Ernani Bernardi, Seventh District
Councilman Mark Ridley-Thomas, Eighth District
Councilwoman Rita Walters, Ninth District
Councilman Nate Holden, Tenth District
Councilman Marvin Braude, Eleventh District
Councilman Hal Bernson, Twelfth District
Councilman Michael Woo, Thirteenth District
Councilman Richard Alatorre, Fourteenth District
Councilwoman Joan Milke Flores, Fifteenth District
Environmental Affairs Commission
Fire Department Planning Section
Brad McAllester, Congestion Management Program, Los Angeles
County Transportation Commission, 818 W. Seventh Street,
Suite 1100, Los Angeles, CA 90017

205120



12700 NORWALK BLVD., P.O. BOX 1030, NORWALK, CA 90651-1030 • PHONE: 213 929-2677 • FACSIMILE: 213 929-3680

January 21, 1992

Mr. Brad McAllester, Manager
Congestion Management Program
Los Angeles County Transportation Commission
818 W. Seventh Street, Suite 1100
Los Angeles, CA 90017

Re: Draft Environmental Impact Report Congestion Management Program
for Los Angeles County

Dear Mr. McAllester:

The City of Norwalk has previously provided a response to the Draft Congestion Management Program. The following comments are provided regarding the N.O.P. for the Draft EIR. Since the comments included in our response to the Draft CMP have not been addressed in the EIR, the following will parallel those comments.

The considerable amount of effort by each Agency to provide a Deficiency Report is of a concern to the City of Norwalk.

- Threshold levels should be approved for the reporting of new development approvals (building permits) and completions within the previous year. The reporting of all development is unnecessary when considering regional trips. In fact, only those types of projects that would contribute to the regional vehicle trips should be considered in the report.
- The same consideration should be carried over to those projects that would be assessed a regional trip fee. The land uses that generate primarily local trips should only be the concern of the local agency for impact mitigation. A local fee ordinance would accommodate this condition very well. Such fees would be used to fund improvements on the City street system which include would both local and regional traffic improvements.

- An estimate of development to be completed, by census tract, over the next twenty years could be an onerous task for a city. The results obtained could be significantly out of line with actual project completions. Using this information from Agencies as the basis for supplemental regional mitigation analysis and delaying approvals on projects of a purely local nature is viewed with great concern by the City of Norwalk. This methodology is intrusion by a Transportation Commission into local decision making using the threat of gas tax confiscation.
- Once again, the collection of a fee by the City of Norwalk which has been established by LACTC, and then turned over to LACTC to fund improvements on some part of a regional network is a concern to the City. Projects to receive these funds must be identified and a nexus established between the project and trip impacts. Specific improvement programming for the candidate projects and anticipated completion dates should be shown.
- If the county wide mitigation fee is implemented and a developer does not agree with his assessment for regional trips, is there an appeals process? Does the developer appeal to the City or to LACTC? What is the developers last resort administratively?
- The whole program appears to be very complex and unwieldy for a local agency to administer considering staff reduction and budgets. The generation of data and information by the area City's to keep LACTC up to date on local land use decisions and verify mitigation fee collection could be a significant burden.
- The requirement for site specific traffic impact studies to consider improvements and development within a five mile radius is presently unworkable. The ability to obtain information on development within five miles is very difficult, if not impossible. Most Agencies presently require information on projects within 1 to 1.5 miles of a proposed development, and even this information is difficult to obtain. This requirement should also only apply to regionally significant projects, not to those developments that will generate primarily local traffic.

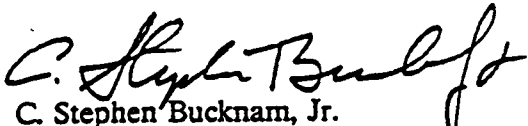
Mr. Brad McAllester, Manager

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January 21, 1992

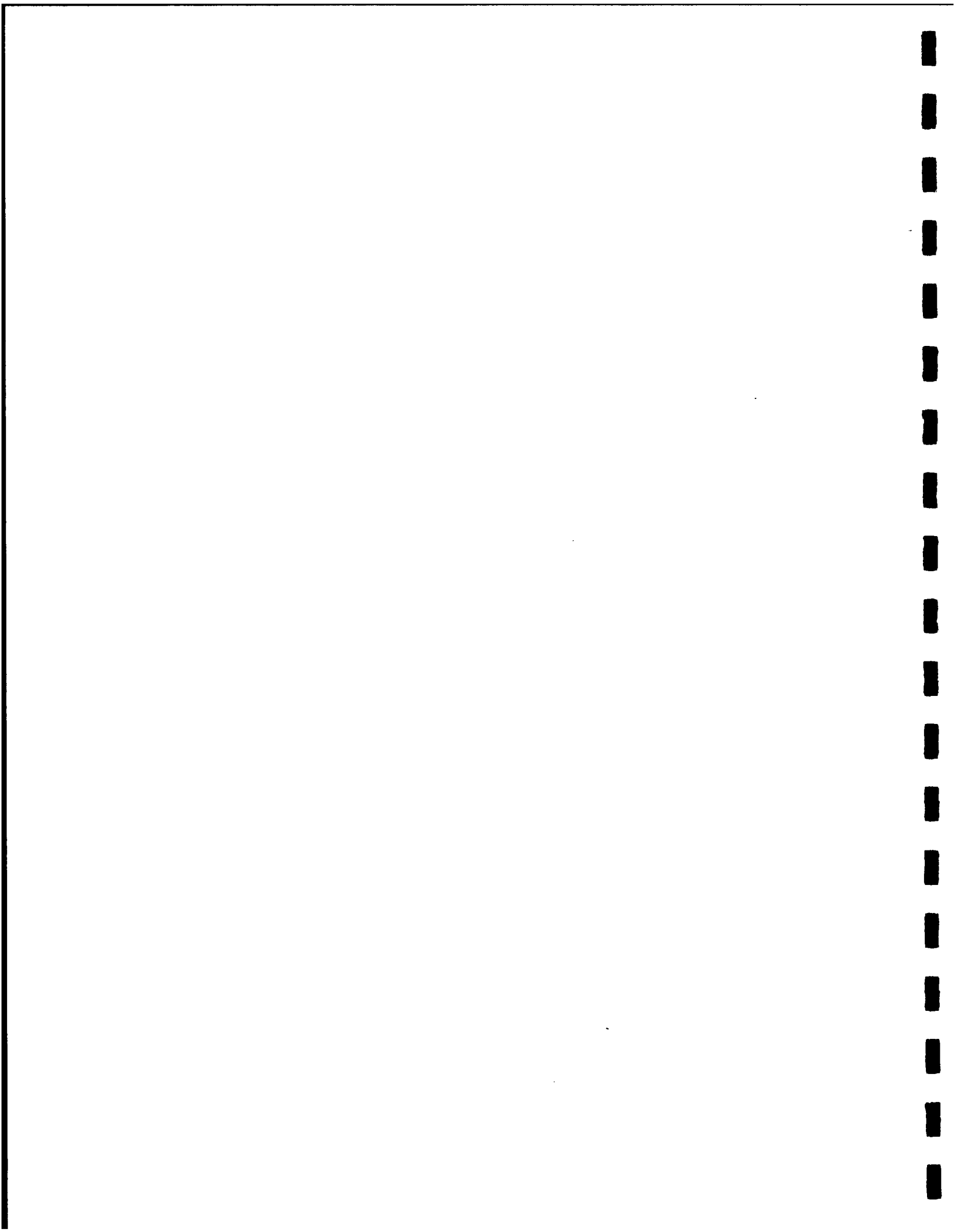
We appreciate the ability to express some of our concerns to you. These issues should be addressed in the EIR and in the final program document.

Very truly yours,



C. Stephen Bucknam, Jr.
Deputy City Manager, Public Works/City Engineer

cc: City Manager
Deputy City Manager/Management Services
Director of Transportation & Engineering
Transportation Engineer





CITY OF LAVERNE CITY HALL

3660 "D" Street, LaVerne, California 91750

January 21, 1992

Bradford W. McAllester
Los Angeles County Transportation Commission
818 West Seventh St., Suite 1100
Los Angeles, CA 90017

SUBJECT: Comments on Notice of Preparation of an
Environmental Impact Report for LACTC's
Congestion Management Program

Dear Mr. McAllester:

The City of La Verne appreciates the opportunity to respond the Notice of Preparation of an Environmental Impact Report for Los Angeles County's Congestion Management Program.

We support the goals of improved air quality and a regional transportation network that works efficiently and effectively. But we are also concerned about the effect that the program will have on our economic development plans, and would like the EIR to consider those effects. We are also concerned about fairness of costs of implementing the program. Small cities should not be unduly burdened with expenses out of proportion with their size, ability to pay, and benefits.

In particular, we would like to be sure that the EIR addresses the following:

8.a. Land Use:

Will the CMP adversely affect local land use decisions? For example, will the program's impact fees discourage location of a shopping center, hotel, business park, etc. in our community, thereby taking away revenue from a city with a modest tax base that needs expanding to adequately pay for services? Would the program take into account that the short-term

1. A. O. I. W.
1992 JAN 24 11:05



traffic impacts of a proposed development will also improve our jobs-housing balance, and therefore the long-term effects on air quality and traffic may well be beneficial? We are concerned that the CMP be consistent with the La Verne General Plan, including the land use and economic development policies.

13. Transportation/Circulation:

The effects of out-of-jurisdiction traffic should be addressed, especially effects on cities bordering other counties. In cases where traffic counts are "unfair" and cannot be changed because of the wording of the legislation governing CMPs, the EIR should address mitigating this unfairness in ways that are compatible with the legislation.

In La Verne, we are particularly interested in the effects of the CMP on Route 30, the Foothill Freeway, which is expected to be completed in the next decade. The freeway now terminates in our city. We would like consideration of the fact that local traffic congestion will be alleviated when the freeway is built; this should be factored into calculations when the impacts of land use decisions are calculated. The EIR should address how the Program will factor in transportation projects now in the pipeline but not yet completed.

14. Public Services:

The costs of implementation will affect local public services/public works budgets, as mentioned in the Initial Study. The EIR should include a thorough analysis of this effect and fair ways to mitigate it.

18. Aesthetics:

Regarding aesthetics, La Verne is concerned with the retention of local control and the ability to review and apply local standards to the design and landscaping of regional transportation facilities in our city. The EIR should address this issue.

19. Cultural Resources:

The EIR must be conscientious in applying CEQA standards to determine what is culturally significant and not restrict itself to properties eligible for the

National Register of Historic Places. CEQA (Appendix G, #j.) states that a project will have a significant effect if it adversely affects a property of historic or cultural significance to a community or ethnic or social group. There are many properties not eligible for the National Register for a variety of reasons, but are important to the local community. Effects on these resources and how they will be mitigated should be addressed in the EIR.

We look forward to reviewing the draft EIR. We appreciate the immensity of the task you are undertaking and realize that we must all cooperate if we are to improve air quality and transportation efficiency in this region. However, we are concerned that we not bear more than our fair share of the burden.

If you have questions or want more information, please call Arlene Banks, Associate Planner at (714) 596-8706.

Sincerely,


Steven A. Preston, AICP
Community Development Director

cc:
City Manager
Director of Public Works

CMPEIR1



CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

RECEIVED
1992 JAN 24 12:15

January 21, 1992

TO: Lillian Y. Kawasaki, General Manager
Environmental Affairs Department
Attention: Gary Gero

FROM: Fire Department

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT
REPORT - CONGESTION MANAGEMENT PROGRAM

The Los Angeles County Transportation Commission proposes to implement the Congestion Management Program for the County of Los Angeles. The Congestion Management Program consists of five components to provide a mechanism for examining and mitigating the impact of land use decisions on the regional transportation network, making more effective use of all transportation modes, and developing transportation solutions that will help to improve air quality.

Access for Fire Department apparatus and personnel to all structures and fire hydrants shall be required.

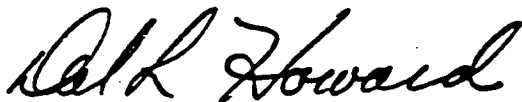
The Operations Control Dispatch Section of the Fire Department shall be notified prior to any projects which would affect Fire Department access to streets, fire hydrants, or structures in order to allow Fire Suppression and Emergency Medical Services to plan alternative routes or contingency plans as needed. Notification is to be made by calling the Operations Control Dispatch Section at (213) 485-6185.

Any necessary improvements to the water system or to the existing fire hydrants due to the Congestion Management Program construction or to any street ending in a cul-de-sac, will be at the applicant's expense.

Ms. Lillian Y. Kawasaki
January 21, 1992
Page 2

For any additional information, please contact our Hydrant Unit,
at (213) 485-5964.

DONALD O. MANNING
Chief Engineer and General Manager



Dal L. Howard, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

DLH:ASM:cec:3140E

cc: Councilman Michael Hernandez, First District
Councilman Joel Wachs, Second District
Councilwoman Joy Picus, Third District
Councilman John Ferraro, Fourth District
Councilman Zev Yaroslavsky, Fifth District
Councilwoman Ruth Galanter, Sixth District
Councilman Ernani Bernardi, Seventh District
Councilman Mark Ridley-Thomas, Eighth District
Councilwoman Rita Walters, Ninth District
Councilman Nate Holden, Tenth District
Councilman Marvin Braude, Eleventh District
Councilman Hal Bernson, Twelfth District
Councilman Michael Woo, Thirteenth District
Councilman Richard Alatorre, Fourteenth District
Councilwoman Joan Milke Flores, Fifteenth District
Environmental Affairs Commission
Fire Department Planning Section
Brad McAllester, Congestion Management Program, Los Angeles
County Transportation Commission, 818 W. Seventh Street,
Suite 1100, Los Angeles, CA 90017

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L.A. COUNTY

Diana P. Scott
William D. Ross
Nellie R. Ancel
Joan T. Lind
Carol B. Sherman

Ross & Scott
A Professional Corporation
520 South Grand Avenue
Suite 300
Los Angeles, California 90071-2610
Telephone: (213) 892-1592
Facsimile: (213) 892-1519

1992 JAN 20 PM 1:10

Palo Alto Office:
850 Hansen Way, 2nd Floor
Palo Alto, California 94304
Telephone: (415) 424-8458
Facsimile: (415) 424-1801

205186

File No: 60418/8.1

January 21, 1992

VIA TELECOPIER & U.S. MAIL

Mr. Brad McAllester
Manager, Congestion
Management Program
Los Angeles County Transportation
Commission
818 West Seventh Street, Suite 1100
Los Angeles, California 90017

Re: Response To Notice Of Preparation Of Draft Environmental
Impact Report For The Congestion Management Program For
Los Angeles County

Dear Mr. McAllester:

The purpose of this communication is to respond to the Notice of Preparation ("NOP") of a draft Environmental Impact Report ("DEIR")¹ for the Congestion

¹ The NOP, p. 2, indicates that the DEIR is a portion of a tiered environmental analysis under the California Environmental Quality Act (Pub. Resources Code §21000, *et seq.*, "CEQA"). CEQA is implemented by the CEQA Guidelines, Cal. Code Regs., Tit. 14, §15000, *et seq.* The CEQA Guidelines have been characterized as binding regulations which, at a minimum, should be accorded great weight by the courts in interpreting CEQA, except when a Guideline provision is unauthorized or erroneous under CEQA. Laurel Heights Improvement Assn. v. Regents of University of California, 47 Cal.3d 376, 391 (1988). The CMP NOP and the initial study do not indicate that the EIR will be assessed with the provisions of the revised CEQA Guidelines which, according to the State Office of Planning and Research, are anticipated to be available in March 1992. To the extent that there are any substantive changes to the CEQA Guidelines, the DEIR should clearly indicate which CEQA Guidelines are being used for the involved procedural or substantive environmental issues.

Mr. Brad McAllester
January 21, 1992
Page 2

Management Program ("CMP") for Los Angeles County on behalf of Shapell Industries, Inc. Shapell Industries, Inc. is the developer of several real estate projects located within the County of Los Angeles which are in various stages of the entitlement process or have obtained a vested right to proceed with quantified residential, or mixed used, development which in turn are subject to specific traffic and circulation conditions.

The NOP consists of the actual notice dated December 6, 1991 and a twenty-five (25) page Initial Study (CEQA Guidelines §15365) which concludes that the CMP may have a significant effect on the environment and that an environmental impact report ("EIR") is required to assess the impact of the CMP on the physical environment.

I. Initial Consultation Under CEQA.

A notice of preparation is intended to assist the lead agency - here, the Los Angeles County Transportation Commission ("LACTC") - in determining the scope of an EIR. Lead agencies are encouraged to include the public in the "scoping process" which is recognized as a method to identify "the range of actions, alternatives, mitigation measures and significant affects to be analyzed" in an EIR and as a method to resolve controversy early in the environmental review process. CEQA Guidelines §§15082, 15083.

II. Consultation With Affected Agencies.

The NOP does not indicate the agencies which have been consulted in connection with the scoping process. Consistent with Pub. Resources Code §21153, the LACTC should indicate in the DEIR that it has, or will, engage in early consultation with local agencies within and bordering the project area and that it will consult with transportation planning agencies and other public agencies that have transportation facilities within their jurisdictions which might be affected by the project consistent with Pub. Resources Code §21092.4.

III. DEIR Contents.

A. Project Description.

An EIR is required to contain an accurate description of the project, including a statement of project objectives, a general description of the project's technical, economic and environmental characteristics and a statement describing the intended uses of the EIR. CEQA Guidelines §15124. The project description has been recognized as the "sine qua non" of a legally sufficient EIR. County of Inyo v. City of Los Angeles, 71 Cal.App.3d 185, 193 (1977). Without an accurate project description, the resulting environmental impact analysis may be flawed and cause the decision-making body to make its determination on an incorrect or incomplete record. Accordingly, the project description portion of the CMP DEIR should be accurately set forth with respect to the

Mr. Bradford W. McAllester
January 21, 1992
Page 3

existing environment (CEQA Guidelines §15360). As a portion of a programmed EIR, it is important that the DEIR project description be broad enough to cover subsequent projects, particularly those in the Proposed Capital Improvement Program Element. Without a broadly drawn project description, the program EIR will not meet its goal of considering the affects of the CMP "as specifically and comprehensively as possible." CEQA Guidelines §15168(c)(5).

The project description portion of the DEIR should include a description of how the CMP will relate to large-scale residential and mixed use development projects which are: (1) presently in various stages of entitlement processing by local governments having land use authority; or, (2) have received a vested right to proceed with specified development subject to specific conditions dealing with traffic and circulation mitigation but which have not yet been completed. Such projects are often conditioned to be built over significant periods of time, sometimes up to thirty (30) years.

B. Environmental Setting.

The DEIR must also include a description of the environment in the vicinity of the project from both a local and regional prospective. CEQA Guidelines §15125. Like the project description, the environmental setting must be accurate in order to insure that the subsequent environmental impact analysis is not misleading or incomplete.

An accurate description of the relationship of the CMP to other large-scale residential and mixed use development projects must be included in the environmental setting portion of the DEIR because those projects which have vested under applicable law may be exempt from imposition of requirements under any transportation demand management ("TDM") ordinance enacted pursuant to the CMP by local government. In addition, such projects may be exempt from imposition of the county-wide mitigation fee proposed under the CMP as the CMP provides that the fee requirement will not be imposed retroactively on development receiving its "final approval" prior to the date of adoption of the CMP.²

TDM

The environmental setting portion of the DEIR, in order to provide a basis for analysis of environmental impacts and cumulative impacts of the project, also must provide information as to the status of large, phased development projects which have already received certain development authorizations which may be characterized as vested even though subsequent discretionary approvals are still required to implement

² This provision of the CMP (Section 7.3.1) should be clarified. It is not clear what constitutes "final approval" for purposes of the CMP. Any definition formulated of "final approval" must be consistent with applicable law as to when a project has acquired a vested right.

Mr. Bradford W. McAllester
January 21, 1992
Page 4

the project. Such a description is necessary as CMP Section 7.2.4 states that only projects covered by a development agreement entered into prior to July 10, 1989 are exempt from the traffic impact analysis and mitigation fee requirements and that CMP mitigation fees will only be collected for projects that have not received final local approval at the time the CMP is adopted. This substantive CMP statement and its attendant environmental analysis must recognize the complex factual and legal status of various development projects presently existing in the project area. As noted, the term "final approval" is not defined nor is there any indication as to how development projects which have obtained a vested status, either by a vesting tentative subdivision tract map or by obtaining a building permit and commencing construction will be treated, e.g., whether they may be exempt.

Stated differently, the prospective imposition of the substantive mitigation measures of the CMP with respect to currently proposed or approved development projects are "clearly interconnected" [Rural Landowners Assn. v. City Council, 143 Cal.App.3d 1013, 1024 (1983)], and therefore must be environmentally assessed in the DEIR.

Again, no adequate analysis of the impacts of the CMP may occur until there is both an accurate project description and environmental setting description. Here, those requirements cannot be satisfied until the substantive content of the CMP is clarified with respect to the development projects, especially those that are phased and the subject of a development agreement or a vesting tentative map, are covered by the CMP. Until this is ascertained, the environmental impacts and cumulative impacts of the proposed project cannot be accurately determined.

C. Alternatives Analysis.

To comply with the requirement that the CMP "provide credit for local public and private contributions to improvements to regional transportation systems" [Gov. Code §65089(b)(4)], the CMP provides that local agencies may request trip credits from LACTC for public or private contributions to improvement projects which commence operations after CMP adoption in 1992. It further provides that trip credits will be assigned to local jurisdictions which will then have the option of using the credits themselves, assigning the credits to specific development projects or selling them to other jurisdictions. The DEIR should include analysis of a project alternative of assignment of trip credits to the developer whose previous contribution created the opportunity for the credit. Giving credit to developers for their contributions which exceed the "nexus" requirement and benefit the region as a whole will provide further incentives for such participation by the private sector in reducing congestion. In addition, the DEIR should consider analysis of a project alternative of providing credits to developers for improvements to the transportation system that commenced operation prior to the adoption of the CMP in 1992. Again, this would be applicable to large-scale phased developments in which transportation improvements have been required to

Mr. Bradford W. McAllester
January 21, 1992
Page 5


be completed prior to issuance of building permits. Analysis of the described alternatives would be consistent with the CEQA Guidelines §15126(d) standard which requires an EIR to describe a range of reasonable alternatives which may feasibly obtain the objectives of the project. Finally, consideration of such alternatives would implement the intent of the Legislature to provide "credit for local and private contributions to improvements to regional transportation systems."

IV. Conclusion.

In summary, both the CMP and the DEIR need to consider further the CMP's prospective application to projects which are currently in the entitlement process or have already received discretionary approval and are the subject of a development agreement or a vesting tentative map but which may require further discretionary approval pursuant to those entitlements, or which are vested but have not yet been completely constructed.

Your consideration of the comments set forth in this communication is respectfully requested in determining the parameters of the environmental analysis of the project in the DEIR.

Very truly yours,



William D. Ross

WDR:pac
cc: Mr. Nathan Shapell, Chairman
Shapell Industries, Inc.

Mr. Brad McAllester
January 21, 1992
Page 6

bcc: Mr. Irving Feintech
Mr. Norman Feintech
Mr. Larry Calemine
Mr. Ronald Silverman, Esquire
Mr. Alan Cummins
Mr. David Hasson
Mr. Sam Ross, President
Crain & Associates

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205185

An Address You Want To Have

Mr. Brad McAllester, Manager
Congestion Management Program
Los Angeles County Transportation Commission
818 W. Seventh Street - Suite 1100
Los Angeles, CA 90017
(213) 623-1194 or 244-6423

SUBJECT: NOTICE OF PREPARATION OF A DRAFT EIR

20 January 1992

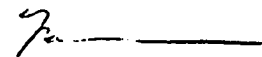
Dear Mr. McAllester:

The attached pages contain my comments on the Preliminary Draft of the CMP. Please retain me on your mailing list and notify me of any future meetings or forums which will be held in the San Fernando Valley. The Northridge Chamber of Commerce has an longstanding interest and concern in transportation problems and solutions for Los Angeles County in general, and the Northwest San Fernando Valley, in particular.

Correspondence may be addressed directly to me at:

Walter N. Prince, President
EXECUTIVE-SUITE SERVICES, INC.
19025 Parthenia Street - Suite 200
Northridge, CA 91324
(818) 993-6300

Cordially yours.



WALTER N. PRINCE
Chairman, Transportation Committee

WNP/tn: encl.



b:NOP for CMP

20 January 1992

TO: Mr. Brad McAllester (LACTC)
FROM: Walter N. Prince (818) 993-6300
SUBJECT: Response to NOP for CMP

Page: 1

1.0 INTRODUCTION

1.1 CMP REQUIREMENTS

Page 3 - "Upon CMP adoption, local agencies are responsible for implementing CMP responsibilities, including:

- Monitoring the attainment of LOS standards and the collection of traffic data for CMP routes that are part of the local street and road system.

ANNUAL MONITORING (2 DAYS PER YEAR) IS NOT SUFFICIENT TO ESTABLISH A HIGH DEGREE OF ACCURACY. MONITORING SHOULD BE PERFORMED AT LEAST MONTHLY AND ANALYZED NO LESS OFTEN THAN QUARTERLY TO ENSURE THAT THE LOS STANDARDS ARE MAINTAINED. PLEASE DISCUSS THE IMPACT ON ACCURACY IF MONITORING IS PERFORMED MONTHLY (ANALYZED QUARTERLY) VS. MONITORING PERFORMED ONLY 2 DAYS PER YEAR.

- Adoption and implementation of a program to analyze the impacts of land use decisions, including mitigation costs

CLARIFY WHO PAYS THE MITIGATION COSTS. PLEASE DISCUSS THE IMPACTS IF FUNDS ARE NOT AVAILABLE TO IMPLEMENT THE MITIGATION MEASURES.

- Developing annual deficiency plans for portions of the CMP system within a jurisdiction that are not maintaining LOS standards...."

CLARIFY THE LENGTH OF TIME THAT WILL BE ALLOWED TO THE LOCAL AGENCY TO RE-ATTAIN ACCEPTABLE BASE LOS STANDARDS. PLEASE DISCUSS THE IMPACT IF THE LOCAL AGENCY IS NOT ABLE TO RE-ATTAIN ACCEPTABLE BASE LOS STANDARDS FOR A DEFICIENT PORTION OF THE CMP SYSTEM.

b:NOP for CMP

20 January 1992

TO: Mr. Brad McAllester (LACTC)
FROM: Walter N. Prince (818) 993-6300
SUBJECT: Response to NOP for CMP

Page: 2

CHAPTER 2 CMP ROLES AND RESPONSIBILITIES

LACTC

Page 7 - Approving Deficiency Plans. Deficiency plans are prepared by local jurisdictions and submitted to LACTC for review and approval. Upon receipt of a deficiency plan, LACTC is responsible for holding a public meeting within a 60-day period. Following this hearing, the deficiency plan is either accepted or rejected by LACTC in its entirety..."

CLARIFY THE LENGTH OF TIME THAT WILL BE ALLOWED TO THE LOCAL AGENCY TO RE-ATTAIN ACCEPTABLE BASE LOS STANDARDS. PLEASE DISCUSS THE IMPACT IF THE LOCAL AGENCY IS NOT ABLE TO RE-ATTAIN ACCEPTABLE BASE LOS STANDARDS FOR A DEFICIENT PORTION OF THE CMP SYSTEM.

LOCAL JURISDICTIONS

Page 8 - Local CMP Implementation Responsibilities.. Government Code 65089.3 identifies specific local responsibilities in conforming to the CMP. These responsibilities include, but are not limited to the following:

- Consistency with LOS and performance standards, except when deficiency plans have been developed.

THIS SECTION IS WRITTEN AS THOUGH THE LOCAL AGENCY CAN OBTAIN AN EXEMPTION FROM THE LOS STANDARD SIMPLY BY DEVELOPING A DEFICIENCY PLAN. PLEASE CLARIFY, AND DISCUSS THE IMPACT IF THE LOCAL JURISDICTION DOES NOT, OR IS UNABLE TO, COMPLY WITH THE LOS STANDARD.

Preparation of Deficiency Plans. When cities or the county have segments or interchanges of the CMP highway/roadway system that do not meet LOS standards, then a local deficiency plan is required to maintain compliance with the CMP. The county or city is responsible for preparing a deficiency plan and adopting it at a noticed public hearing. The deficiency plan includes the following:

2. A list of improvements and the cost of improvements necessary to attain the minimum LOS standard.
3. A list of improvements, programs, or actions, and their estimated costs, that measurably improve LOS on the CMP system and contribute to significant improvements in air quality....
4. Development of an action Plan to either attain the LOS standard (identified in step #2 above) or to identify congestion and air quality improvements to the CMP system (identified in step #3 above).

THIS SECTION IS WRITTEN AS THOUGH THE LOCAL AGENCY CAN OBTAIN AN EXEMPTION FROM THE LOS STANDARD SIMPLY BY IDENTIFYING CONGESTION AND AIR QUALITY IMPROVEMENTS THAT ARE NEEDED FOR THE CMP SYSTEM. PLEASE CLARIFY, AND DISCUSS THE IMPACT IF THE LOCAL JURISDICTION DOES NOT, OR IS UNABLE TO, COMPLY WITH THE LOS STANDARD.

TO: Mr. Brad McAllester (LACTC)
FROM: Walter N. Prince (818) 993-6300
SUBJECT: Response to NOP for CMP

b:NOP for CMP
20 January 1992
Page: 3

PLEASE DISCUSS WHO PAYS FOR THE IMPROVEMENTS, AND WHO IMPLEMENTS THEM.
ALSO DISCUSS THE TIMETABLE FOR IMPLEMENTATION, AND WHO MONITORS THE
ACTION PLAN AND CERTIFIES COMPLETION OF THE IMPROVEMENTS.

The preparation and approval of a deficiency plan avoids a finding of nonconformance when the LOS standards for segments or intersections on the CMP system are not attained. This avoids the loss of local subvention funds to a local jurisdiction.

THIS SECTION DISCUSSES "PREPARATION AND APPROVAL" OF A DEFICIENCY PLAN, BUT DOES NOT DISCUSS THE "IMPLEMENTATION" OF CORRECTIONS OUTLINED IN THE DEFICIENCY PLAN. PLEASE DISCUSS THE IMPACT IF THE DEFICIENCY PLAN IS APPROVED BUT THE CORRECTIVE MEASURES ARE NEVER IMPLEMENTED.

THE LOCAL JURISDICTION SHOULD NOT BE EXEMPTED FROM PENALTIES SIMPLY BECAUSE IT HAS "PREPARED" A DEFICIENCY PLAN. THE PURPOSE OF THE CMP IS TO MAINTAIN THE MINIMUM LOS LEVEL. UNTIL THAT LEVEL HAS BEEN RE-ATTAINED, THE LOCAL AGENCY SHOULD NOT RECEIVE ITS GAS TAX FUNDS. PLEASE DISCUSS THE IMPACT IF THE DEFICIENCY PLAN IS APPROVED BUT THE CORRECTIVE MEASURES ARE NEVER IMPLEMENTED.

SCAG

Page 10 - Regional Consistency Finding. SCAG is responsible for reviewing the CMP prepared by LACTC to evaluate the consistency between the CMP and the current Regional Mobility Program, adopted in 1989. ...If the CMP is consistent with the Regional Mobility Plan, CMP projects are incorporated into the Regional Transportation Improvement Program. If the CMP is inconsistent with the Regional Mobility Plan, inconsistent CMP projects are excluded from the Regional Mobility Plan.

FOR INFORMATION PURPOSES, INCONSISTENT PROJECTS SHOULD BE IDENTIFIED IN THE CMP, ALONG WITH IDEAS ON HOW TO MAKE THEM CONSISTENT, AND POTENTIAL CANDIDATES FOR INCLUSION IN THE FOLLOWING YEAR'S REGIONAL MOBILITY PLAN. PLEASE DISCUSS THE IMPACT IF INCONSISTENT PROJECTS ARE EXCLUDED FROM THE REGIONAL MOBILITY PLAN.

LOCAL DEVELOPERS

Page 11 - Local Development Review. ...Local developers should be aware that new development proposals will need to consider the impact of development on the CMP system and how that impact can be mitigated. At the July 24 (1991) meeting of the LACTC, it was decided that any fees that are a part of the CMP would not apply until the CMP is formally adopted in 1992. (See Chapter 7 for mitigation procedures).

CHAPTER 7 (SECTION 7.2.4 ON PAGE 43) STATES THAT FEES WILL BE CHARGED TO "PROJECTS" THAT ENTERED INTO A DEVELOPMENT AGREEMENT WITH A LOCAL JURISDICTION AFTER JULY 10, 1989, BUT THEN GOES ON TO SAY THAT "FEES WILL ONLY BE COLLECTED FOR THOSE "PROJECTS" THAT HAVE NOT RECEIVED FINAL LOCAL APPROVAL AT THE TIME THE CMP IS ADOPTED" (IN LATE 1992). THE DATES (1989 VS. 1992) ARE CONFUSING AND SHOULD BE CLARIFIED. IN

TO: Mr. Brad McAllester (LACTC)
FROM: Walter N. Prince (818) 993-6300
SUBJECT: Response to NOP for CMP

b:NOP for CMP

20 January 1992

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.....
ADDITION, CHAPTER 7 (SECTION 7.3.1 ON PAGE 46) ALSO STATES THAT FEES "WILL NOT BE IMPOSED RETROACTIVELY TO DEVELOPMENT WHICH RECEIVED FINAL APPROVAL PRIOR TO THE DATE OF CMP ADOPTION". THIS SHOULD ALSO BE CLARIFIED.

PLEASE DEFINE "FINAL APPROVAL" AND SPECIFY THE EXACT STAGE OF DEVELOPMENT WHEN THE PROJECT IS COMMITTED TO PAYING FEES. WILL IT BE UPON "FINAL APPROVAL" OF THE TENTATIVE MAP, OR THE FINAL MAP, OR PLAN CHECK, OR A BUILDING PERMIT, OR A CERTIFICATE OF OCCUPANCY?

FURTHER, PLEASE EXPLAIN WHETHER "FINAL APPROVAL" WILL EXEMPT PROJECTS SUBJECT TO DEVELOPMENT AGREEMENTS ENTERED INTO AFTER JULY 10, 1989 FROM CMP CHARGES. FOR EXAMPLE, THE PORTER RANCH PROJECT WILL GENERATE 150,602 VEHICLE TRIPS PER DAY, AND THE DEVELOPMENT AGREEMENT WILL BE SIGNED IN THE SPRING OF 1992. IF PORTER RANCH HAS ITS TENTATIVE MAPS APPROVED PRIOR TO THE CMP BEING ADOPTED IN THE FALL OF 1992, IS PORTER RANCH THUS EXEMPTED FROM ALL CMP FEES?

PLEASE DISCUSS THE IMPACT IF PORTER RANCH AND OTHER LARGE PROJECTS ARE EXCLUDED FROM THE CMP FEE PROCESS.

b:NOP for CMP

20 January 1992

TO: Mr. Brad McAllester (LACTC)
FROM: Walter N. Prince (818) 993-6300
SUBJECT: Response to NOP for CMP

Page: 5

CHAPTER 3 CMP POLICY STATEMENTS

Page 13 - ...Local land use authority remains the responsibility of local jurisdictions. LACTC will not be responsible for directing the land use decisions of local jurisdictions. Rather, it is our hope that local jurisdictions will use the CMP process as a tool in making land use decisions that consider and enhance countywide mobility.

ALTHOUGH LACTC MAY NOT BE RESPONSIBLE FOR ACTUALLY "DIRECTING" LAND USE DECISIONS, ASSEMBLY BILL AB 471 AND SECTION 65089(b) OF THE STATE GOVERNMENT CODE ARE VERY CLEAR WHEN SPECIFYING THAT THE CMP

"...shall contain all of the following elements:

- (1) Traffic LOS standards established for specific intensities of land uses including rural, semi-rural, suburban, urban, and central business district...*
- (4) A program to analyze the impact of Land Use Decisions made by local jurisdictions on regional transportation systems, including an estimate of the costs associated with mitigating those impacts."*

LACTC SHOULD DO MORE THAN "HOPE" THAT LOCAL AGENCIES WILL PROPERLY IMPLEMENT THE CMP. LACTC SHOULD INSTEAD ACT ON THE BASIS AND UNDER THE BELIEF THAT IT HAS A SACRED MISSION TO "ENSURE" THAT LOCAL AGENCIES MAKE THE CORRECT LAND USE DECISIONS AS REGARDS LOCAL TRAFFIC CONGESTION AND COUNTYWIDE MOBILITY.

TO: Mr. Brad McAllester (LACTC)
FROM: Walter N. Prince (818) 993-6300
SUBJECT: Response to NOP for CMP

Page: 6

CHAPTER 4 CMP HIGHWAY AND ROADWAY SYSTEM

4.1 INTRODUCTION

Page 13 - 4.1.1 Statutory Requirement. ...CMP statutes require the LACTC to designate a system of highways and roadways, including all State highways and principal arterials. While State highway routes are defined in State statute, principal arterials are not defined. Once designated as part of the CMP system, no highway or roadway shall be removed from the system.

Statute also requires the LACTC to establish LOS standards to measure congestion on the system. LOS's range from A to F; LOS A represents free-flow conditions, while LOS F represents a high level of congestion....

LOS standards can be set no lower than LOS E, or the current level if worse than E.

CLARIFY WHETHER LOS F WILL BE DIVIDED INTO SUBLEVELS, SUCH AS F-1 THROUGH F-10. ALTHOUGH TRAFFIC SPEED AT LOS F IS DEFINED AS 20 MPH OR LESS, THERE ARE DEFINITE DIFFERENCES IN FLOW AT SPEEDS AVERAGING 20 MPH AND SPEEDS AVERAGING ONLY 5 OR 6 MPH, BUT TECHNICALLY STILL CLASSIFIED AS LOS F.

PLEASE DISCUSS THE IMPACT IF ALL OF LOS F IS TREATED AS THE SAME AMOUNT OF CONGESTION, WHETHER TRAFFIC IS AT 20 MPH OR AT A STANDSTILL.

4.2 NETWORK DEFINITION

Page 16 - ...Caltrans and local jurisdictions will be responsible for monitoring LOS, including the cost of data collection and computation.

...Local jurisdictions will be responsible for assessing the impact of new development on the CMP system....

...Routes that are included on the CMP network cannot be deleted from the network.

4.2.1 L.A. County CMP Highway System ... This CMP system is a 1,000 mile system, including 500 miles of State freeways, 400 miles of State arterials, and 100 mile of local arterials. ...The CMP system includes routes that meet the following criteria:

- o All existing State highways (both freeways and arterials)
- o Principal arterials, defined as:
 - Routes that complete gaps in the State highways system
 - Routes that provide connectivity with the CMP systems of adjacent counties
 - Routes that are high volume and multi-modal travel corridors that provide cross-county or significant inter-jurisdictional transportation

TO: Mr. Brad McAllester (LACTC)
FROM: Walter N. Prince (818) 993-6300
SUBJECT: Response to NOP for CMP

b:NOP for CMP

20 January 1992

Page: 7

.....
DEFINE "HIGH VOLUME" AND "SIGNIFICANT" IN TERMS OF LOS.
MUST THE ENTIRE CORRIDOR BE "SIGNIFICANT, OR MERELY
SPECIFIC INTERSECTIONS? ARE VOLUME AND SIGNIFICANCE
BASED ON PEAK-HOUR TRAFFIC OR ON A 24-HOUR BASIS?

PLEASE DISCUSS THE IMPACTS.

Routes that provide appropriate regional spacing on the CMP network

DEFINE "APPROPRIATE SPACING". IS THIS A 2-MILE-SQUARE
GRID, OR 3 MILES, OR 4 MILES, OR OTHER?

Page 17 Exhibit 4 lists the specific routes and limits included in the CMP system.

This system is recommended as the basis of the CMP system for the following reasons:

- o Routes serve as important countywide thoroughfares, providing over 50% of the travel in the county.
- o Routes identify high-volume traffic corridors. Many major freeway routes in Los Angeles carry 200,000 - 300,000 vehicles per day, and many principal arterials carry 30,000 - 50,000 vehicles per day.

LOS ANGELES HAS MANY ARTERIALS THAT CARRY 30,000 OR MORE VEHICLES PER DAY, BUT THESE ARTERIALS ARE NOT INCLUDED IN THE CMP SYSTEM. WHY NOT?
PLEASE DISCUSS THE IMPACT IF ALL ARTERIALS THAT CARRY 30,000 OR MORE VEHICLES PER DAY ARE INCLUDED IN THE CMP SYSTEM.

- o The CMP network provides a countywide transportation network, with sufficient coverage and spacing for CMP traffic analysis purposes.

PLEASE DEFINE THE PARAMETERS FOR "SUFFICIENT COVERAGE AND SPACING"

Page 18 4.2.3 Routes for Further Study. ... LACTC and local jurisdictions have both identified additional routes that may be significant and warrant inclusion on the CMP system....

By virtue of the fact that these routes for further study are included in this draft CMP, these routes will be environmentally assessed as part of the EIR. During the upcoming year, a technical working group will be convened to make recommendations regarding whether specific routes should be added to the CMP system....

Criteria that will be suggested in making this decision include the following:

- o Added Capacity: Routes that parallel the adopted CM system for more than 5 miles and provide additional capacity to CMP system corridors.

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- o High Traffic Volume: Routes that have significant traffic volume based on ADT measurement
- o Significant Trip Length: Routes that have a high proportion of peak period travel of greater than 5 miles in length...
- o Multi-modal Corridor Travel: Routes that provide for high person-trip throughput, because of availability of alternative transportation modes.

LOS ANGELES HAS MANY ARTERIALS THAT MEET THE ABOVE CRITERIA, BUT THESE ARTERIALS ARE NOT INCLUDED IN THE CMP SYSTEM. WHY NOT? PLEASE DISCUSS THE IMPACT IF ALL ARTERIALS THAT MEET THE CRITERIA ARE INCLUDED IN THE CMP SYSTEM.

4.3 LOS STANDARDS

Page 20 - 4.3.2 CMP Monitoring Guidelines. The CMP system must be monitored annually, and LOS on specific CMP routes will be annually published in the CMP.

The following guidelines will be used for monitoring the CMP highway system:

- o Monitoring Locations - Appendix E provide a preliminary map and list of locations to be monitored. As shown a total of 164 intersections have been identified for monitoring across the county....

Freeway monitoring locations have been selected to indicate operating conditions in major freeway corridors. Caltrans will be responsible for monitoring these locations.

Arterial monitoring will be accomplished by measuring the LOS for key intersections. The intersections that have been selected were identified based on a 2-mile spacing. These intersections also reflect capacity-constraining (bottleneck) intersections with major cross streets. Spacing is sometimes greater on rural highways, where there are fewer constraining intersections.

THE INTERSECTIONS SHOWN IN APPENDIX E ARE NOT SPACED EVENLY AT 2-MILE INTERVALS. FOR EXAMPLE, IN THE NORTHWEST PORTION OF THE SAN FERNANDO VALLEY THE PRINCIPAL NORTH-SOUTH ARTERIALS SELECTED BY LACTC ARE TOPANGA CANYON BLVD AND THE SAN DIEGO FREEWAY (7.5 MILES APART), WHILE THE PRINCIPAL EAST-WEST ARTERIALS ARE VICTORY BLVD. AND THE SIMI VALLEY FREEWAY (6.0 MILES APART). THIS GRID ALONE IS 45 SQUARE MILES, AS OPPOSED TO THE 4-SQUARE-MILE GRID PROPOSED BY LACTC.

THE MAP AND LIST OF LOCATIONS PRESENTED IN APPENDIX E SHOULD BE CORRECTED TO REFLECT EVEN AND CONSISTENT SPACING OF MONITORING INTERSECTIONS. PLEASE DISCUSS THE IMPACT IF ARTERIAL SPACING IS EVEN AND CONSISTENT VS. NON-EVEN AND NON-CONSISTENT ACROSS THE REGION.

PLEASE DESCRIBE THE EXACT LOCATION OF THE ARTERIAL MONITORS. ARE THEY BEFORE EACH INTERSECTION, OR AFTER, OR BOTH? PLEASE DISCUSS THE IMPACTS IF MONITORING IS CONDUCTED ONLY FOR TURNING VOLUMES VS. FOR TURNING VOLUMES AND THROUGH VOLUMES.

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Page 22 o Data to be Collected - Data collected as part of annual monitoring and transmitted to LACTC should include:

- (a) Freeways - Number of lanes in each direction;
24-hour volumes, by direction, in 15-minute increments
- (b) Intersections - Lane configurations;
Signal phasing;
AM and PM peak period turning volumes, in 15-minute increments

THE THROUGH VOLUME OF VEHICLES AT INTERSECTIONS SHOULD ALSO BE COUNTED, ESPECIALLY IF THE ARTERIAL PARALLELS A FREEWAY. PLEASE DISCUSS THE IMPACT OF ONLY COUNTING TURNING VOLUMES VS. COUNTING TURNING AND THROUGH VOLUMES.

4.4 LOS METHODOLOGY

Page 22 - 4.4.1 Freeway LOS. Caltrans currently measures LOS as a function of travel speed and duration of congestion. As part of its CMP responsibility, Caltrans will compute freeway LOS using the Highway Capacity Manual methodology.

PLEASE STATE THE CAPACITY OF EACH FREEWAY LANE IN TERMS OF VEHICLES PER HOUR.

WILL CALTRANS ALSO MEASURE LOS ON STATE ARTERIALS? IF SO, WILL THEY BE MEASURED IN THE SAME FASHION AS FREEWAYS, OR WILL THEY BE MEASURED USING THE ICU METHOD? PLEASE DISCUSS THE IMPACTS OF EACH.

4.4.2 Arterial LOS. ...For computation of intersection operations, the Intersection Capacity Utilization (ICU) methodology is...recommended to calculate volume to capacity ratios and LOS. The parameters should include 1600 vehicles per lane for all through and turn lanes, 2880 (total) for dual turn lanes, and 10% clearance time.

IS THE CAPACITY OF 1600 VEHICLES PER LANE THE CAPACITY DURING EACH HOUR, OR DURING EACH HOUR OF GREEN TIME? PLEASE DISCUSS THE IMPACTS OF EACH.

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.....
CHAPTER 7 TRANSPORTATION IMPACT ANALYSIS PROGRAM AND
DEFICIENCY PLAN/MITIGATION FEE REQUIREMENTS

7.2 LAND USE/TRANSPORTATION IMPACT ANALYSIS PROGRAM

Page 42 - 7.2.1 Statutory Requirement - Land Use Program. Statute requires that the CMP include a program to analyze the impacts of land use decisions on the regional transportation system, including the cost of mitigating associated impacts. ...The LACTC is also responsible for calculating credit for local public and private contributions to improvements to the regional transportation systems....

HOW IS THE AMOUNT OF CREDIT DETERMINED? WHO WILL MONITOR THE IMPROVEMENT TO DETERMINE IF THE AMOUNT OF CREDIT IS REALISTIC AND JUSTIFIED? AND HOW LONG WILL THE MONITORING CONTINUE? FOR FUTURE CREDITS, WILL LACTC DEEM THAT THE CREDIT IS EARNED WHEN AN IMPROVEMENT IS PLANNED, OR WHEN WORK ON THE IMPROVEMENT HAS PHYSICALLY BEGUN, OR WHEN WORK ON THE IMPROVEMENT IS COMPLETED AND SIGNED OFF?

PLEASE DISCUSS THESE QUESTIONS AND THE IMPACTS OF THE "CREDIT SYSTEM" ON THE CMP FINANCING PACKAGE.

Page 43 7.2.4 Types and Sizes of Development Subject to Traffic Impact Analysis Requirements. ...The only exceptions to CMP traffic impact analysis (TIA) and mitigation fee requirements, once the final CMP is adopted, are as follows:

- o Projects that entered into a Development Agreement with a local jurisdiction prior to July 10, 1989. Development Agreements are obligations entered into on the part of a developer and a jurisdiction as specified under Section 65864 of the California Government Code (See Appendix H). The Commission has further directed that CMP mitigation fees will only be collected for those projects that have not received final local approval at the time the CMP is adopted. No fees will be retroactively collected from developers or local jurisdictions.

THIS PARAGRAPH SAYS THAT "PROJECTS" WHICH ENTERED INTO DEVELOPMENT AGREEMENTS PRIOR TO JULY 10, 1989 ARE EXEMPT FROM MITIGATION FEES. THE PARAGRAPH THEN SAYS THAT MITIGATION FEES WILL ONLY BE COLLECTED FOR "PROJECTS" THAT DO NOT HAVE FINAL LOCAL APPROVAL AT THE TIME THE CMP IS ADOPTED, WHICH IS ANTICIPATED TO BE IN THE FALL OF 1992. PLEASE CLARIFY WHICH STATEMENT IS CORRECT AND DISCUSS THE IMPACTS.

PLEASE DEFINE "FINAL APPROVAL". IS THIS "FINAL APPROVAL" OF TENTATIVE TRACT MAPS, FINAL MAPS, OR IS IT THE ISSUANCE OF A BUILDING PERMIT, OR IS IT THE FINAL CERTIFICATE OF OCCUPANCY FOR A STRUCTURE? PLEASE DISCUSS THE IMPACTS AND STATE THE SPECIFIC POINT IN THE DEVELOPMENT CYCLE AT WHICH "FINAL APPROVAL" IS ATTAINED.

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Page 44 7.2.5 LACTC Traffic Impact Analysis Approach In developing TIA procedures, three alternatives were explored:

- o Site-Specific TIA. Using this approach, LACTC would provide TIA procedures for use by local agencies in identifying trips generated by new development and identifying their unmitigated impact on the CMP network....
- o Development of a Countywide Mitigation Fee Schedule. This method was proposed as a simplified procedure by the CMP Policy Advisory Committee....

ONLY TWO ALTERNATIVES ARE DISCUSSED. WHAT IS THE THIRD ALTERNATIVE?

Page 45 Due to consideration of the comments received in combination with statutory intent, LACTC recommends the following procedures for CMP land use impact analysis, as described below:

- o Site-Specific TIA for Major Projects. The objective of this process is to identify site-specific impacts and mitigation within the immediate vicinity of major projects. The following general steps are involved:
 -The impact of trips on the CMP system in the immediate area will be analyzed using a 5-mile radius for CMP arterial and freeway monitoring locations.

CLARIFY WHETHER THIS IS A 5-MILE RADIUS FROM THE DEVELOPMENT SITE OR FROM EACH MONITORING LOCATION.

- Site-specific mitigation should be proposed based on the impact of the development within the study area...

CLARIFY THE BOUNDARIES OF THE STUDY AREA. IS THIS A 5-MILE RADIUS FROM THE DEVELOPMENT SITE OR FROM EACH MONITORING LOCATION?

7.3 COUNTYWIDE MITIGATION FEE

Page 46 7.3.1 Timing of Mitigation Fee Implementation. The LACTC recently determined that countywide mitigation fees will not be required prior to adoption of the final CMP in 1992. The Commission also specifically stated that the fee requirements will not be imposed retroactively to development which received final approval prior to the date of CMP adoption.

PLEASE DEFINE "FINAL APPROVAL". IS THIS "FINAL APPROVAL" OF TENTATIVE TRACT MAPS, FINAL MAPS, OR IS IT THE ISSUANCE OF A BUILDING PERMIT, OR IS IT THE FINAL CERTIFICATE OF OCCUPANCY FOR A STRUCTURE? PLEASE DISCUSS THE IMPACTS AND STATE THE SPECIFIC POINT IN THE DEVELOPMENT CYCLE AT WHICH "FINAL APPROVAL" IS ATTAINED.

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7.4 DEFICIENCY PLANS

Page 49 Statute requires that a jurisdiction annually prepare a jurisdiction-wide Deficiency Plan for those portions of the CMP system that deteriorate below the LOS standard. Local jurisdictions submit completed Deficiency Plans to LACTC....

Deficiency Plans will be prepared by each local agency for those portions of the CMP system that are located within its boundaries, excluding freeway segments. Countywide deficiencies, as measured through monitoring on the freeway system, will be addressed through the countywide mitigation fee program.

PLEASE CLARIFY WHETHER THE LOCAL AGENCIES ARE RESPONSIBLE FOR PREPARING DEFICIENCY PLANS FOR ARTERIALS WHICH ARE ALSO STATE HIGHWAYS. THE STATE HIGHWAY ARTERIALS COMPRISE 40% (400 MILES) OF THE CMP SYSTEM, WHEREAS THE LOCAL ARTERIALS COMPRISE ONLY 10% (100 MILES) OF THE ENTIRE CMP SYSTEM. PLEASE DISCUSS THE IMPACTS IF ALL ARTERIALS (STATE AND LOCAL) ARE NOT INCLUDED IN THE DEFICIENCY PLAN.

PLEASE CLARIFY WHETHER THE LOCAL AGENCIES ARE RESPONSIBLE FOR PREPARING DEFICIENCY PLANS FOR FREEWAY ON/OFF RAMPs AND THEIR ADJACENT STREETS. PLEASE DISCUSS THE IMPACTS IF THESE ARE NOT PREPARED.

Page 50 7.4.1 Local Deficiency Plan Development Process. The deficiency plan process begins with monitoring of the CMP system by local agencies. The agency then provides counts and LOS calculations to LACTC for documentation of current conditions. If this monitoring indicates that current conditions have deteriorated below the LOS standard, a deficiency plan must be prepared. Deficiency plans must be adopted annually....

CLARIFY HOW INPUT FROM THE MONITORING OF FREEWAYS AND STATE ARTERIALS IS MERGED INTO THE DEFICIENCY PLAN PROCESS. WHAT HAPPENS IF THE FREEWAYS ARE SO OVERLOADED THAT MOTORISTS DRIVE ON ARTERIALS RATHER THAN FREEWAYS? PLEASE DISCUSS THE IMPACTS.

Statute requires deficiency plans to include the following elements:

- o An analysis of the cause of the deficiency.
- o A list of improvements necessary to maintain the LOS standard and the estimated cost of the improvements.
- o A list of improvements, programs, or actions and their estimated cost, that will measurably improve the LOS of the system and contribute to significant improvements in air quality....
- o An Action Plan to implement the recommended improvements. The Action Plan shall include a specific implementation schedule.

NO TIME CONSTRAINTS ARE MENTIONED. HOW MUCH TIME WILL BE ALLOWED TO IMPLEMENT RECOMMENDED IMPROVEMENTS, AND HOW MUCH NEW DEVELOPMENT WILL BE ALLOWED TO PROCEED DURING THE TIME REQUIRED TO IMPLEMENT THE RECOMMENDED IMPROVEMENTS? PLEASE DISCUSS THE IMPACTS IF DEVELOPMENT CONTINUES BUT THE IMPROVEMENTS ARE NOT MADE.

DISCUSS THE IMPACTS IF THE SYSTEM IS SIMPLY SO OVERLOADED THAT IT IS

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.....
IMPOSSIBLE TO MAKE IMPROVEMENTS THAT WILL RETURN THE SYSTEM TO THE BASE LOS STANDARD.

WHO PAYS FOR THE RECOMMENDED IMPROVEMENTS? DISCUSS THE IMPACTS IF THE FUNDS ARE NOT AVAILABLE AND WILL NOT BE AVAILABLE IN THE FORESEEABLE FUTURE?

CLARIFY HOW MUCH NEW DEVELOPMENT WILL BE ALLOWED TO PROCEED IF IT IS IMPOSSIBLE TO MAKE IMPROVEMENTS THAT WILL RETURN THE SYSTEM TO THE BASE LOS STANDARD. PLEASE DISCUSS THE IMPACTS IF DEVELOPMENT IS SCHEDULED BUT THE SYSTEM IS TOO OVERLOADED TO EVER RE-ATTAIN ITS BASE LOS STANDARD.

Page 51 7.4.2 Local Deficiency Plan Development Procedures. The local Deficiency Plan will be prepared annually, and due to the LACTC by August 1st of each year following the adoption of the CMP, commencing in 1993.

- o The Deficiency Plan will be jurisdiction-wide or multi-jurisdictional. The Plan will identify all deficient segments of the CMP system based on current traffic counts.

CLARIFY WHETHER "ALL DEFICIENT SEGMENTS" WILL INCLUDE FREEWAY SEGMENTS AND STATE ARTERIAL SEGMENTS. PLEASE DISCUSS THE IMPACTS IF SOME SEGMENTS ARE NOT IDENTIFIED.

- o (The Deficiency Plan will include) a list of locally implemented regional transportation improvements. Projects included in this report should be major projects that enhance system-wide or corridor capacity on the CMP network, and have a funding commitment. Such projects could include major roadway facility construction (over \$200,000) as well as major TDM or transit mitigation strategies.

CLARIFY THE MEANING OF THE WORDS "LOCALLY IMPLEMENTED". DOES THIS MEAN IMPLEMENTED BY THE LOCAL JURISDICTION? OR DOES IT REFER TO A SPECIFIC GEOGRAPHIC AREA? IF SO, CLARIFY THE GEOGRAPHIC AREA.

CLARIFY WHETHER THIS LIST IS SUPPOSED TO INCLUDE IMPROVEMENTS TO FREEWAYS AND STATE ARTERIALS.

PLEASE DISCUSS THE IMPACT IF SUCH A LIST CANNOT BE COMPILED BECAUSE NO FUNDING HAS BEEN COMMITTED.

Page 52 o The Deficiency Plan will also include an annual report of development approved. This report will include the following:

- A summary of new development approvals (building permits) and completions (certificates of occupancy) issued during the preceding fiscal year. This information will be used to LACTC to update the CMP land use database and countywide model, and to verify mitigation fee collection.

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The following must be provided biennially in even-numbered years:

- o An estimate of the developments to be completed, by census tract, over the next 20 years. This will be used by LACTC to update the countywide mitigation fee....

WHY NOT PROVIDE THIS ESTIMATE ANNUALLY, BASED ON THE SAME ANNUAL REPORT OF DEVELOPMENT APPROVED. PLEASE DISCUSS THE IMPACT IF THE REPORT IS PREPARED ANNUALLY.

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.....
CHAPTER 10 LOCAL COMPLIANCE RESPONSIBILITIES AND PROCEDURES

Page 57 ...The LACTC must annually determine local agency conformance to the CMP at a noticed public hearing....

LACTC will prepare a checklist of factors that will be considered in making its conformance finding. Each jurisdiction will be asked to annually certify that it is in compliance with the checklist. LACTC will also periodically monitor local compliance and assist agencies in meeting the requirements of the program.

Page 58 Conformance criteria being considered by LACTC include the following:

- o Maintaining the LOS on the CMP highway system unless an annual Deficiency Plan is prepared....

THIS SENTENCE CAN BE INTERPRETED AS MEANING THAT THE LOCAL AGENCY DOES NOT HAVE TO MAINTAIN THE BASE LOS IF IT PREPARES AN ANNUAL DEFICIENCY PLAN. PLEASE CLARIFY THE INTENT OF THIS SENTENCE AND DISCUSS THE IMPACT IF LOCAL AGENCIES ARE NOT REQUIRED TO MAINTAIN BASE LOS FOR ARTERIALS WITHIN THEIR JURISDICTION.

- o Conducting annual traffic counts and calculating LOS standards for selected State and local intersections and local arterial links, as specified in the traffic monitoring procedures.

CLARIFY WHETHER ARTERIAL LINKS WILL BE INCLUDED IN THE TRAFFIC ANALYSES, AND PLEASE DISCUSS THE IMPACT IF ARTERIAL LINKS ARE NOT ANALYZED AS PART OF THE TRAFFIC ANALYSES.

- o Adoption and implementation of a program to analyze the impacts of new development on the CMP system and their associated mitigation costs. This requirement includes compliance with CMP traffic impact analysis procedures and the submittal of an annual land use report, as discussed in Chapter 7....

ANNUAL LAND USE ANALYSIS REPORTS, AS SUCH, ARE NOT DISCUSSED IN CHAPTER 7. UNLESS THESE REPORTS ARE THE SAME AS EITHER THE "ANNUAL REPORT OF DEVELOPMENT APPROVED" OR THE "BIENNIAL ESTIMATE OF DEVELOPMENTS TO BE COMPLETED OVER THE NEXT 20 YEARS", BOTH OF WHICH ARE MENTIONED IN SECTION 7.4.2 ON PAGE 52. PLEASE CLARIFY.

APPENDIX I GUIDELINES FOR LAND USE/TRANSPORTATION IMPACT ANALYSIS

Page I-2 I-4 STUDY AREA The study area included in CMP transportation impact analyses must include, at minimum, the following:

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- o All arterial monitoring locations within a 5-mile radius of the project site.

PLEASE DISCUSS THE IMPACTS IF THERE ARE NO MONITORING LOCATIONS ON ANY OF THE ARTERIALS WITHIN THE 5-MILE RADIUS. OR IF THERE ARE ONLY 1 OR 2.

- o Primary freeway on- and off-ramp intersections likely to be used by project-related traffic.

CLARIFY IF THIS IS IN 4 MAJOR DIRECTIONS AND WITHIN WHAT RADIUS FROM THE PROJECT. PLEASE DISCUSS THE IMPACT IF THE ANALYSIS DOES NOT INCLUDE ALL FOUR MAJOR DIRECTIONS (NORTH, SOUTH, EAST, AND WEST) FROM THE PROJECT SITE.

- o All freeway monitoring locations within a 5-mile radius of the project site

PLEASE DISCUSS THE IMPACTS IF THERE ARE NO MONITORING LOCATIONS ON ANY FREEWAY WITHIN THE 5-MILE RADIUS. OR IF THERE ARE ONLY 1 OR 2.

Page I-4 I.8 LOS ANALYSIS The objective of LOS analysis is to identify locations at which a deficiency will likely result due to a development. A deficiency results whenever the measured LOS on the CMP network falls below the adopted standard. The adopted standard in L.A. County is LOS E, except where the current (1992) LOS is F. Where the 1992 LOS is F, any traffic increase would result in a deficiency.

CLARIFY IF THERE WILL BE ANY SUBSETS TO LOS F (F1, F2, F3, ETC.).

THIS SECTION STATES THAT ANY PROJECT TO BE BUILT IN A LOS F AREA WOULD HAVE TO TOTALLY MITIGATE EVERY VEHICLE TRIP GENERATED BY THAT PROJECT. PLEASE CONFIRM AND DISCUSS THE IMPACTS IF ALL THE VEHICLE TRIPS SIMPLY CANNOT BE MITIGATED.

IF A DEVELOPER WISHES TO BUILD IN A LOS F AREA AND CANNOT MITIGATE ALL THE TRAFFIC GENERATED BY HIS/HER PROJECT, CAN THE DEVELOPER SIMPLY "BUY OFF" THE IMPACTS BY PAYING MITIGATION FEES? IF SO, PLEASE DISCUSS THE IMPACT ON THE LOCAL AGENCY WHEN THE ANNUAL DEFICIENCY REPORT IS PREPARED?

- END -



CITY OF CULVER CITY

4095 OVERLAND AVENUE • P.O. BOX 507
CULVER CITY, CALIFORNIA 90232-0507

205102

January 20, 1992

Mr. Brad McAllester, Manager
Congestion Management Program
LACTC
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Re: Notice of Preparation Congestion Management Program (CMP) EIR

Dear Mr. McAllester:

Thank you for the opportunity to comment on the Notice of Preparation for the subject project. The City of Culver City has received the subject NOP and related Initial Study and has the following comments:

1. With respect to the impacts on Public Services as discussed on page 18 (Section 14) of the Initial Study for the Congestion Management Program, there will be significant impacts on maintenance of public facilities and other governmental services. The EIR should analyze and discuss these impacts in a separate section, especially as they will affect the availability of local governmental resources.

Impacts on public services will be both direct and indirect, and should be fully discussed as required by section 15126 of the State CEQA Guidelines. The section also should address the impacts on local governments which would arise if "nexus study" is found to be legally sufficient to support imposition by local governments of trip mitigation fees on a case-by case basis.

2. The following comment applies to Section 8 (Land Use), 11 (Population), and 12 (Housing):

CMP Fees or development restrictions can have a substantial impact on potential or proposed developments in the area. The EIR should discuss effects of slowed or reduced development on City/County economy.

Mr. Brad McAllester

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3. Concerning Air 2b, "creation of objectionable odors", the Initial Study concludes that there will not be any impacts. The CMP may have both positive and negative impacts in this regard. The reduction of congestion and the steady movement of traffic may reduce idling of vehicles stopped in traffic thereby reducing fumes.

On the negative side, the CMP may result in the short-term increase in fumes and odors due to construction of improvements. There is also the potential for the negative impact caused by objectionable odors if construction and use of roadways in new areas not currently developed takes place as well as such an impact from the introduction of additional traffic into various areas.

The EIR should analyze these potential impacts.

4. Concerning the overall CMP EIR process, the timing of the availability of the Nexus Study for local review and comment in relation to commenting of the EIR is still unclear.

The City is concerned that the time constraints upon implementing the CMP not result in Nexus Study issues being far advanced in LACTC policy before local comments can be developed and forwarded for consideration.

5. The CMP, as currently drafted, relies almost exclusively on major capital improvements. The purpose of the plan, as stated in the legislation, is to use lower cost Transportation System Management (TSM) measures to rapidly solve congestion problems. We should ask that a broader range of alternatives be considered, including measures such as additional computerized traffic signals, improvements to arterials paralleling regional routes, and enhancement to the portions of the transit systems which feed the current regional express bus routes. Without such improvements, which are needed to relieve existing congestion, traffic will continue to divert onto and overwhelm the regional facilities.
6. The parameters which will be used to set the development fees need better explanation. In particular, the degree to which improvements that reduce traffic volume on the regional system will be credited needs clearer definition. Given the current development of the freeway system, arterial routes often are used as "short cuts" around congestion on the freeway system. Development which

improves conditions on these arterials and thereby relieves congestion on the regional system, should receive credit. Further, mechanisms should be setup whereby a phased development that "frontloads" improvements beyond their initial CMP fee obligations would be able to carry forward their credits. Lastly, any CMP measure implemented by the City or developers, whether or not it is on the mitigation list, should receive credit since it will release the funds which would have otherwise provided these improvements

7. Two routes are of particular concern to the City of Culver City. Overland Avenue is already, in part, included in the CMP. We wish to make certain that should we, or development within the City, fund improvements to any or all of the substandard portions of this facility, we will receive appropriate credit. Secondly, because of the acute angle formed between the northbound I-405 and eastbound I-10 Freeways, Culver Boulevard is a very important regional access route for Culver City. We wish to make certain that improvements to this route, and their ability to manage congestion on the regional system, are fully considered in the study process.
8. The plans to provide additional bus service as part of the CMP are very important elements. However, we want to make certain that these improvements allow for flexibility in use by local transit agencies. Culver City Municipal Bus Lines provide vital service for all types of trips including long distance commute trips. The CMP should explicitly provide municipal operators with the funding, either directly or through credits, to expand their service and thereby increase overall transit ridership. In order for the goal of increasing regional commuter and other long distance ridership to be achieved, the feeder/distributor systems can not continue at their current level of overcrowding.
9. Transit comments are included in the attached document previously submitted to LACTC in October 1991 as comments on the Final Draft CMP. The Culver City Municipal Bus Lines is especially concerned that mitigation fee "credits" remain with the jurisdiction where the fee originated and not be permitted to be used by a developer as a credit in another jurisdiction.

Mr. Brad McAllester
January 20, 1992
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10. Culver City has attached the October 1991 City comments on the Final Draft CMP because these substantive issues are still unclear or unaddressed.

If you have any questions on the comments please contact Joan Kassin at (310) 202-5775.


COLLEEN EGBERT
CEQA Manager

CE:mdk

Enclosure

cc: Paul A. Jacobs, Mayor
James D. Boulgarides, Vice Mayor
Mike Balkman, Councilmember
Jozelle Smith, Councilmember
Jody Hall-Esser, Chief Administrative Officer
Norman Y. Herring, City Attorney
Evelyn Keller, Deputy City Attorney
Pauline Dolce, City Clerk
Jay B. Cunningham, City Planner
James S. Davis, City Engineer
Dave Ashcraft, Transportation Director
Carol DeLay, Deputy City Planner
Ken Johnson, Consulting Traffic Engineer
John Rivera, Associate Planner
Birgit Brazill, Senior Management Analyst

CITY OF CULVER CITY ADDITIONAL COMMENTS ON THE CMP EIR
(ORIGINALLY SUBMITTED OCTOBER 1991 AS COMMENTS TO THE
"FINAL DRAFT CMP")

CITY OF CULVER CITY COMMENTS REGARDING
THE FINAL DRAFT CONGESTION MANAGEMENT PROGRAM

1. The Nexus Study

- o The City Attorney has advised that the nexus study must clearly specify the basic assumptions underlying the "per unit" calculations. Thresholds for applying the mitigation fee to different types of developments should be responsive to the differing impacts, e.g. a neighborhood dry cleaning or shoe repair within a strip commercial center adjacent to a residential neighborhood generates different traffic than large commercial centers. The nexus study should fairly reflect such differences.
- o The nexus study is expected to provide technical clarification on thresholds for fees, trip credits, interjurisdictional issues, "cumulative impacts" concerns and other matters. The response in Appendix A-18 on "cumulative analysis" is not clear.

2. Trip Credits should only be transferable within the "subregion" e.g., the five-mile radius of the project which generated the credits.

3. Local Costs of Implementation and Compliance with CMP

Local jurisdictions should be able to retain a percentage of CMP impact fees collected to offset the substantial additional responsibilities required by the CMP. The references in the Final Draft and Appendices to local CMP responsibilities fitting within existing local procedures is not reasonable. The magnitude of CMP activities which cities must provide, in addition to those which are passed on to developers, is referred to throughout the CMP (e.g. Chapter 10 of the Final Draft); however, there is no acknowledgment that cities cannot absorb such costs in the current fiscal climate without assistance.

4. The CMP Network

The City of Culver City strongly opposes adding any streets to the network beyond the base network included in the Discussion Draft. The "Second Tier" streets should not be included until experience has been gained concerning how the base network will operate when the CMP becomes operational. The cost of monitoring the network are not yet known nor can the consequences of adding streets - which cannot be removed - be evaluated at this time.

5. TDM Ordinance

LACTC had indicated that cities would not be placed between private companies and the AQMD/CMP for annual monitoring of TDM requirements. Chapter 6.5 of the Final Draft assigns such as on-going burden to cities which lack the resources to accept this charge. TDM

6. Initial Collection of Mitigation Fee

For purposes of determining whether a mitigation fee applies to a project, the City Attorney advises that "final local approval" should be defined as "final local discretionary approval" and not as the issuing of the building permit. The building permit stage is the reasonable time to collect the fee, however, the obligation to pay a particular amount in fees must be imposed by the City and agreed to by the developer at the earlier discretionary approval phase.

7. Annual Land Use Analysis Report

Clarification is needed concerning what information must be included in this report, especially the data from the building permit, so that records can be efficiently coded for this new report.

8. Traffic Impact Analysis

- o The local concern expressed in Chapter 7.2.5 of the Final Draft does not appear to be addressed: "The cost of requiring traffic impact analysis for small development is a serious concern to local jurisdictions". The Final Draft indicates all CMP traffic impact analyses must consider a five-mile radius. Smaller developments should be able to conduct impact analyses, qualifying to mitigate the CMP fee, with study areas less than the 5 miles for larger projects. Costs for such studies should be in proportion to the scope of development.
- o In order for the shopping center threshold project size (Appendix I-2) to relate to the 150 vehicle trips in the peak direction, it is essential that CMP procedures continue to include the "assumption of 25% pass-by trips" as stated in Appendix I-2.
- o The interaction between a local jurisdiction and the CMA when project mitigations are identified and funded appeared to be a separate process in the Discussion Draft. The Final draft does not address such projects. Clarification is needed in this regard. The second response in Appendix A-18 is not clear.

9. Local CMP Review Procedures

The process and standards to be used by the CMA to certify the local CMP review process is not included in the Final Draft. Is this process part of the current CMP or has it been replaced by the "conformity finding" and self certification process in Chapter 10 of the Final Draft?

10. Interjurisdictional CMP Relationships

The Final Draft gives no procedural suggestions concerning how to effect interjurisdictional cooperation. A responsible contact person for CMP inquiries should be required for all jurisdictions.

11. Deficiency Plan

How is a mitigation option to be assessed in terms of satisfying a deficiency?

12. Trip Distribution

Trip distribution and the assignment of trips to the CMP network is too localized an issue for regional guidelines to be accurately or equitably used. Such distributions should be assigned at the local or subregional level.

13. Transit Comments

- o Changes in the CMP street network directly impact the transit monitoring network. The existing final draft is inconsistent. The existing transit network was intended to include all bus routes that are either on the CMP network or on a route for further study. But the final draft of the CMP lists Washington Boulevard as a route to be studied further but the corresponding bus routes are not on the transit network. This happened because additional streets were added to the "for further study list" after the transit network had been completed. Both systems must be consistent. Hence, if the CMA decides to either add/delete routes to the street network or decides not to have "routes for further study" anymore at all then major changes have to be made to the transit network. TRANSIT
- o Throughout the draft document the CMP states that transit operators should be consulted during the development review process. We recommend that this requirement should be changed to "shall". We believe that it is essential that all cities follow Culver City's example and include transit operators in their developmental review process.

- o The draft CMP discusses the countywide mitigation fee and its relationship to local measurements. It remains unclear to us though whether any developer contribution to Culver CityBus will be credited towards the countywide mitigation fee. We believe that this should be the case. Developers should not be hit twice. If they contribute to Culver CityBus capital/operating expenditures then the mitigation fee should be reduced/eliminated accordingly.

- o Culver City recommends that a portion of the countywide mitigation fee collected by the City be kept to offset CMP administrative expenditures.

a:cmp.lo

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CONFIDENTIAL ROLL

MANATT, PHELPS, PHILLIPS & KANTOR

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW

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027048

January 20, 1992

7745-033

VIA FEDERAL EXPRESS

Mr. Brad McAllester
Manager, Congestion Management Plan
Los Angeles County Transportation Commission
Suite 1100
818 West Seventh Street
Los Angeles, California 90017

Re: Comments on the Scope of the Environmental
Impact Report for Congestion Management Plan

Dear Mr. McAllester:

We would like to make the following comments on the scope of the Environmental Impact Report for the Congestion Management Plan (CMP):

The CMP, as currently drafted, relies almost exclusively on major capital improvements. The purpose of the plan, as stated in the legislation, is to use lower cost Transportation Systems Management (TSM) measures to rapidly solve congestion problems. We would ask that a broader range of alternatives be considered, including measures such as additional computerized traffic signals, improvements to arterials paralleling regional routes, and enhancement to the portions of the transit systems which feed the current regional express bus routes. Without such improvements, which are needed to relieve existing congestion, traffic will continue to divert onto and overwhelm the regional facilities.

The parameters which will be used to set the development fees need better explanation. In particular, the degree to which improvements that reduce traffic volume on the regional system will be credited needs clearer definition. Given the sparseness of the freeway system, arterial routes often are used as shortcuts around congestion on the freeway system. Development which improves conditions on these arterials and thereby relieves congestion on

MANATT, PHELPS, PHILLIPS & KANTOR

Mr. Brad McAllester
January 20, 1992
Page 2

the regional system, should receive credit. Further, mechanisms should be set up whereby a phased development that "frontloads" improvements beyond its initial CMP fee obligations would be able to carry forward its credits. Lastly, any CMP measure implemented by the City or developers, whether or not it is on the mitigation list, should receive credit since it will release the funds which would have otherwise provided these improvements.

Very truly yours,



William F. Childs
Manatt, Phelps, Phillips & Kantor

WFC/lp

MP



DEPARTMENT OF COMMUNITY DEVELOPMENT

CITY HALL - 1400 HIGHLAND AVENUE - MANHATTAN BEACH, CALIFORNIA 90266-4795
TELEPHONE (213) 545-5621 FAX (213) 545-5234

205215

MICROFILMED
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January 20, 1997

Los Angeles County Transportation Commission
Brad McAllester, Manager, Congestion Management Program
818 W. Seventh Street Ste 1100
Los Angeles, CA 90017

Dear Mr. McAllester,

Thank you for the opportunity to comment on the Notice of Preparation for the Congestion Management Plan for Los Angeles County.

The City of Manhattan Beach offers the following comments for your consideration:

1. We believe that at a minimum, a Subsequent EIR should be prepared rather than the reliance on the use of an EIR from an earlier project (Regional Mobility Plan - RMP), or "program level EIR from which ...project level environmental assessments may be tiered" (as stated in your NOP).
2. Section 15153, Code of Regulations Title 14, Chapter 3, State of California (CEQA Guidelines) allows a lead agency to employ a single EIR if the projects are essentially the same in terms of environmental impact. There are several references in the Initial Study to the differences between the RMP and the CMP:
 - a. Project area: The RMP is a plan for the entire South Coast Air Basin while the CMP is being prepared only for Los Angeles County.
 - b. The introduction of the countywide mitigation fee represents "new information of substantial importance" (Section 15162, CEQA Guidelines) which requires the preparation of a Subsequent EIR.
 - c. An "updated air quality impact assessment using a 1990 base year using 1990 census data" represents "new information of substantial importance". The examination of "both regional and localized impacts associated with traffic generated emissions" also represents "new information".

d. Further inclusion of "new information":

(1) "a discussion of the potential of different types of improvement projects to create light and glare impacts".

(2) "...include transportation strategies and funding sources which were not contemplated at the time the environmental work for the RMP and GMP was conducted".

3. Although the Initial Study notes that the RMP EIR identifies geological and seismic impacts as unavoidable significant adverse impacts, the checklist indicates only the possibility of such impacts. This represents an inconsistency in the "tiering" process proposed for the CMP.
4. The Initial Study identifies a possibility that the mitigation fee which is under development might affect land use. The City of Manhattan Beach thinks that the mitigation fee will have a significant effect on land use.
5. Section 15152(2)(c) (CEQA Guidelines) seems to preclude tiering for the CMP EIR: "Tiering...shall be limited to situations where the project is consistent with the general plan and zoning of the...county in which the project would be located."
6. A Subsequent EIR is required when substantial changes occur...which will require major revisions in the environmental impact report, or when new information, which was not known...at the time the environmental impact report was certified as complete (Section 21166 Public Resources Code, CEQA) - appears to be another clear indication of the need to prepare a separate and independent document.
7. The important issue of alternatives to the project is not discussed in the Initial Study. We recommend the required inclusion of reasonable alternatives in the Draft EIR, including an alternative with no countywide mitigation fees.

This comment letter is mailed one day after your stated deadline of January 20, 1992 because that date was a postal holiday. If you have any questions, do not hesitate to call me at 310-545-5621, X291.

Sincerely,



Maxine R. Woerner, AICP
Senior Planner

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205005

Memorandum - City of Pasadena

To: Brad McAllester, Manager, CMP,
Los Angeles County Transport-
ation Commission

Date: Jan. 17, 1992

1992 JAN 21 PM 1:56

From: Nancy Key, Sr. Planner, Environ-
Nancy Key mental

Re: NOP EIR for CMP

Attached are the comments from the Public Works and Transporta-
tion Department. There will be more detailed comments on the
Draft Environmental Impact Report from this department.

A concern from the Planning Department is that SCAGS's Regional
Growth Management Plan (GMP) may be partially based on the growth
scenarios from the Land Use Elements of jurisdictions within its
boundaries. In addition to being revised with the 1990 census
data, the RMP may need to be revised to consider changes in Land
Use Elements since the EIR for the Regional Mobility Plan was
prepared.

The Land Use and Circulation Elements of Pasadena's General Plan
are currently being revised. Pasadena's revised Land Use Ele-
ment is to be voted upon in a November 1992 election.

Thank you for the opportunity to comment on the NOP. I look for-
ward to being able to comment on the Draft EIR.

If you have any questions regarding this memorandum, I may be
reached at (818) 405-4206.

iscmp 1.17.92



mp



CITY OF SOUTH EL MONTE

1415 N. SANTA ANITA AVENUE
SOUTH EL MONTE, CALIFORNIA 91733
(818) 579-6540 • (213) 686-0460 • FAX (818) 579-2107

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January 17, 1992

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COPY IN RMC

Brad McAllester
Los Angeles County
Transportation Commission
818 W. Seventh St., Suite 1100
Los Angeles, California 90017

Gentlemen:

City Staff have reviewed the received LACTC Initial Study for the draft Environmental Impact Report (EIR) for the Congestion Management Program (CMP) for Los Angeles County and have concluded that at this point in time that there is no reason to comment on the document's scope and content.

The Staff is aware that the Initial Study is the first step in the preparation of the draft EIR and that as the document is prepared and submitted to the cities for their review that the City will avail itself of the opportunity for further review and comment during the year of 1992.

City Staff is also aware that it is the intent of the LACTC to tier the environmental analysis of the CMP from the EIR for the Regional Mobility Plan (RMP). The EIR for the current RMP was prepared in 1988. The CMP EIR will be tiered from the current RMP EIR. The individual improvement projects included in or made necessary by the CMP will be subject to CEQA environmental review requirements, as appropriate. The CMP EIR will serve as a program level EIR from which these project level environmental assessments may be tiered.

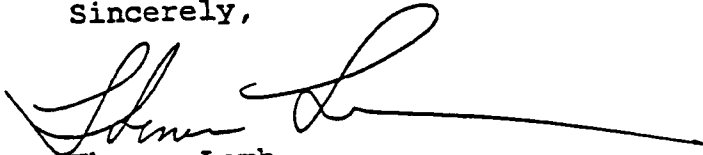
The land use analysis requirement contained in the CMP is present to make certain that local jurisdictions will consider the regional transportation impact of new development as part of their land use approval process; ensuring that private and public projects are able to comply with CEQA requirement to consider the potential regional impact of a project as part of the environmental analysis of potential project impact.

Brad McAllester
January 17, 1992
Page Two

The City has noted that the Initial Study mentioned that the CMP EIR will identify specific improvement projects which clearly pose the potential to create significant environmental impact.

If you have any questions concerning this letter, please contact me at (818) 579-6540.

Sincerely,



Thomas Lamb
Director of Planning
and Community Development

TL/CMP/sc

cc: Gary Myrick
Associate Planner

George Envall
City Traffic Engineer

John R. Hjelm, Jr.
Administrative Analyst

PDS13



City of South Gate

1650 CALIFORNIA AVE., SOUTH GATE, CALIFORNIA 90280 • (213) 563-9537

205099

FROM THE OFFICE OF
JAMES A. BIERY, P.E.
DIRECTOR OF PUBLIC WORKS
CITY ENGINEER

FILED
RMC

JAN 22 1992

January 17, 1992

Mr. Brad McAllester
CMP Program Manager
Los Angeles County Transportation Commission
818 West Seventh Street
Los Angeles, CA 90017

RE: Final EIR Congestion Management Program
for Los Angeles County

Dear Mr. McAllester:

The following comments are provided regarding the subject report. The comments parallel those previously provided regarding the Draft CMP which are attached as Exhibit "A". These have not been addressed in the final EIR. Please forward these comments and concerns to your consultants for consideration.

The nexus study and the proposed county-wide mitigations fees are also a significant concern to the City of South Gate. Please inform me of any way I can assist in this effort.

Some key concerns related to application of any collected fees are identified below.

1) If the deficient element is eligible for funds other than those collected through impact fees, what proportion of funding will be provided by the impact fees? For example, if a freeway under Caltrans jurisdiction requires widening, how much of the widening costs will be paid through state, federal or other fund sources vs. impact fees, and how will equity be maintained among jurisdictions? It appears possible that one city may have to pay a high proportion of costs while another city may pay a low proportion. An imbalance of shares may be considered equivalent to an absence of nexus.

2) If an element of the transportation system is not currently deficient but may be in need of improvement in the future due to cumulative development, may the collected fees to applied to the future improvement of the transportation element?

The CMP does not appear to provide any credit or consideration to impacts of improving the jobs/housing balance in a city or area. Since this may assist in mitigating deficiencies and/or reducing impacts (and is a concern identified in the Regional Mobility Plan) it is suggested that some form of credit or incentive be included in the CMP for improvements in the balance.

Further information is needed in order to evaluate the types of credits identified in the Meyer, Mohaddes Associates, Inc. memorandum dated December 30, 1991. There is a concern for the restriction on trip credits to public agencies which is discussed.

In essence, there is a significant concern that the mitigation fee system will adequately address the varying levels of congestion, development activity, and funding needs throughout the County.

If I may be of any assistance, please contact me.

Sincerely,



JAMES A. BIERY, P.E.
Director of Public Works

JAB:lc

Attachment

cc: Todd W. Argow, City Manager
Andy Pasmant, Director of Community Development

P
1-TGN



PLANNING
DEPARTMENT
DAVID S. FERREN
PLANNING DIRECTOR

CITY OF
TORRANCE

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1992 JAN 27 PM 1:59

January 17, 1992

Mr. Brad MacAllester, Program Administrator
Los Angeles County Transportation Commission
818 West Seventh Street
Los Angeles, Ca 90017

SUBJECT: COMMENTS ON THE RECENT DEVELOPMENT OF THE CMP COUNTYWIDE
MITIGATION FEE PROGRAM

Dear Mr. MacAllester:

We would like to bring to your attention the following concerns about the Nexus Study and the fee credit program being developed for the CMP.

1.) We are concerned about the use of fees outside of the jurisdiction in which it is collected. We realize that you want to implement those improvement projects which will yield the greatest regional benefit. However, we feel that if you want us to monitor and be responsible for particular roadway facilities within our city that are deemed to be regionally significant, then we should be allowed to maximize the use of any fees collected to make improvements on these facilities. We support the comments made at the recent CMP Policy Advisory Committee (PAC) meeting that all eligible improvement projects should be included on the CMP Capital Improvement Project (CIP) Candidate Project list and to determine at a later date which projects will be given priority.

2.) We have the following comments on the development of the countywide mitigation fee credit/discount system being proposed by the consultant and LACTC staff:

- * Define "transit station" as discussed under trip discounts. We understand that LACTC staff and the consultant will further define what types of transit facilities are eligible for trip discounts. City staff requests that the LACTC consider giving credits for bus stations in addition to rail and multi-modal stations. This is critical in addressing an equity in jurisdictions that do not -and may not- have rail transit systems.
- * Reconsider the 1/4 mile criteria proposed under the trip discount system. We understand that this criteria was developed to encourage walking to the proposed developments, however, we feel that the criteria may not encourage developers located outside the

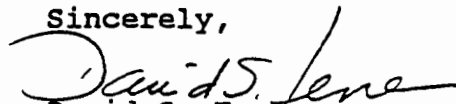
1/4 mile discount limit to implement transit/TDM-type programs because they will not receive any tangible benefit from it.

At the last CMP PAC meeting, members stated that there is no guarantee that the location of a project near a transit station would increase transit use by employees or patrons to the site. Torrance staff supports the PAC recommendation that the consultant consider awarding transit credits based on the distance from the transit station. This assumes that the further a development is located from the transit station, the fewer benefits it may receive from the transit station. However, under this process, any development will be eligible for these transit credits if it provides a connection to the transit station as well as creating incentives for the use of transit.

- * How will a developer know how much of the CMP fee will offset the trips generated by his project? It will be critical to insure that developments mitigate both the local and regional impacts associated with the project. We will wait for LACTC staff and the consultant to further develop how impacts from a particular project will be measured and mitigated for the CMP.
- * Specify whether the trip credits/discounts will be awarded in dollars or points. In the memo prepared by Meyer, Mohaddes Associates, facility credits take the form of "dollar for dollar credits given for facilities on the mitigation fee list which are paid for by developers". Will the discounts take the same form?

If you have any questions, please contact Transportation Planning staff at (310) 618-5990.

Sincerely,


David S. Ferren
Planning Director

cc: Brynn Kernaghan, LACTC South Bay Area Team staff
Richard Burtt, City Engineer
Art Horkay, Transportation Director

COALITION FOR

CLEAN AIR

122 Lincoln Blvd., Suite 201 • Venice, CA 90291
(310) 450-3190 • FAX (310) 399-0769



January 16, 1992

L.A.C.T.C.

1992 JUN 21 7 14 AM

Brad McAllester
Manager, CMP
LACTC
818 W. 7th St.
Suite 1100
Los Angeles, CA 90017

Dear Brad:

Although I've already sent comments on the CMP, I would also like to see the issues I raised addressed in the EIR. With that in mind, I've listed a series of specific questions below. Each of them refers to and is further illuminated by portions of my CMP comments. Please refer to my CMP comments and include them when answering each of the questions below.

1. The purported goal of the plan is to reduce congestion. However, it neglects the *growth inducing* effects of freed up road capacity. Research shows that new capacity attracts additional travel and facilitates longer distance commutes. The result is more congestion and more sprawl. In light of this, the CMP as it currently stands will very likely result more congestion and more air pollution. How will the CMP deal with these impacts of freer flowing roadways?
2. Transportation Demand Management is a good way to decrease the demand for transportation resources. However, the TDM measures in the CMP are wholly inadequate to the task. For instance, non-residential facilities of 100,000 square feet or more can satisfy the sample TDM ordinance by putting in bike racks, a vanpool loading zone and sidewalks leading into the development. These amenities could do absolutely nothing to decrease demand for road capacity. The CMP must include TDM measures that will create real reductions in demand for transportation. Some of these could include performance standards that developments must meet or mitigation fees that encourage the "right" kind of development, such as density along rail routes or mixed use development to put affordable housing near jobs. Developers must be forced to limit the burden they can place on the transportation system. Please analyze the impact of these and other alternative TDM strategies. In addition, if you are to keep the current TDM strategy in the plan, prove that it will actually have any effect on demand.

TDM

3. The CMP establishes Level of Service (LOS) standards for roadways and intersections. However, arteries that are already at LOS F (the worst) are allowed to stay that way. Since large portions of the highway system are already at LOS F, the CMP will therefore do nothing at all to mitigate congestion for one of the critical pieces of the transportation system. In fact, this policy institutionalizes gridlock, surely an unacceptable impact.
4. The CMP reveals a bias for autos over public transit. Rail is mentioned only in its potential to free up enough road space for convenient driving. The goal of the CMP should be to unseat the single occupant vehicle as the main mode of transportation in the basin. How will the CMP do this? As it stands now, other modes of transportation take a back seat to the auto. Rail must be made an equal partner in planning. If the CMP expects as many cars on the road in the future as we have now, we won't be attaining air quality standards and healthful air any time soon. Once again, this is an unacceptable result.
5. The CMP mentions the "extensive rail system" that is currently in development. It says nothing about how the rail system will be used as part of congestion mitigation. For instance, reshaping our urban form so that more people live near rail stations or other ways of developing a large ridership base for rail routes. This goes back to comment number 4 above. All the effort has gone into defining the CMP Roadway Network and seeing how we can improve roads. Why hasn't rail been made an equal partner in the CMP? Much more effort must be put into using rail resources to attain air quality and congestion management goals.
6. If the focus is on roads then we're going to institutionalize congestion. Southern California has been increasing road capacity for decades. The result has been more congestion and more air pollution. Please explain how further increasing road capacity by highway and intersection improvements is going to give a different result.
7. The plan states that as much as half of new development in the City of LA is below its threshold for traffic impact analysis yet provides no means for dealing with the substantial burden this development places on the regional transportation system. In other words, even if all the other CMP measures really had the effect of reducing congestion and pollution (and I don't believe they will as currently designed) it would all be undone since half the development wouldn't even be under CMP jurisdiction. This development would presumably occur as it always has and result in more vehicle trips, more congestion and more air pollution. To be effective, all development must fall under the purview of the CMP.
8. The CMP largely relies on local jurisdictions for its implementation. Among other things, local governments must develop and enforce TDM ordinances, assess impacts of new development and monitor levels of service. However, experience indicates that local governments can not be

TRANSIT

TDM

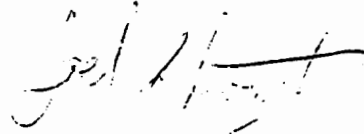
relied on to perform these tasks adequately. The 1989 Air Quality Management Plan relied on local governments to implement measures that would have accounted for half of all the emissions reductions from transit. The Southern California Association of Governments conducted a survey in August of 1990 to assess their progress. More than half of the 142 local governments didn't even bother to respond. Of the rest, less than half had taken, or were planning to take, any action. Why should we expect local jurisdictions to behave any differently with the CMP? How do you propose to make the CMP effective if local jurisdictions don't come on board?

TDM

9. This CMP only deals with LA County but congestion and air pollution are regional problems. With all the counties developing their own plans, we run the risk of lack of coordination or incompatible goals. This could undo even the best possible CMP. How will you guarantee coordination and compatibility of the CMP of all the South Coast counties?

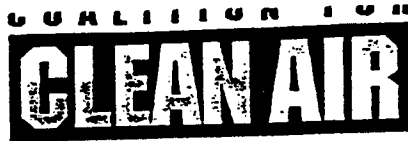
The Coalition is pleased to participate in the development of an effective CMP to bring us better transportation and more healthful air. We look forward to seeing our concerns addressed in the CMP EIR.

For Cleaner Air,



Joel Schwartz





122 Lincoln Blvd., Suite 201 • Venice, CA 90291
(310) 450-3190 • FAX (310) 399-0769



**Comments on the Final Draft of LACTC's Congestion
Management Program**

Presented by
Joel Schwartz
Staff Scientist
10/15/91



Introduction

The LACTC's Congestion Management Program has the potential to push the South Coast Air Basin (Basin) toward the twin goals of reduced congestion and clean, healthful air. The Coalition commends the LACTC for acknowledging the inextricable link between air quality and congestion relief goals. We recognize the immensity of LACTC's task and the difficulties of maneuvering around many and various jurisdictions. However, although the CMP represents a good first step, it doesn't go nearly far enough. The plan pays great attention to road and transit monitoring networks but the transportation demand management and land use provisions are incomplete and lack teeth. Certainly, data collection will inform the modelling efforts that go into future CMP improvements, but, as we outline below, there is already a large body of evidence to guide us toward an urban form that encourages efficient use of transportation resources.

Transportation, congestion and air quality are regional issues, the solutions to which cross many jurisdictional and political boundaries. We call on the LACTC to take the lead in providing a comprehensive blueprint for the basin's transportation system. The LACTC should include all measures it believes necessary to ensure efficient regional mobility even if they are outside the commission's authority. In short, the CMP should tell us what needs to be done without regard to which entities will be the ones to do it. Issues of implementation can be worked out once we know where we're headed. In the following, we outline what we believe are deficiencies in the current CMP and how they can be remedied.

Congestion and Travel Demand Tradeoffs

The CMP endeavors to reduce congestion by creating freer flowing roadways and intersections, with concomitant air quality benefits. However, the plan neglects the growth inducing feedback effects of freed up road capacity. The new capacity will attract additional travel and facilitate longer distance commutes. In fact, a large body of evidence affirms the tradeoff between fuel efficient traffic and fuel efficient cities (Newman and Kenworthy, 1988, 1984, hereafter NK). In other words, optimizing traffic for better fuel efficiency results in a city that is less fuel efficient overall. The cities with the most congestion have the lowest fuel consumption per capita. This conclusion was borne out by NK's study of 32 cities across the

globe in which Los Angeles registered one of the lowest fuel efficiencies and one of the highest average traffic speeds. NK drew a number of other interesting conclusions:

- Cities with the highest average traffic speeds have the highest per capita fuel consumption.
- Cities with the highest per capita fuel consumption tend to have slow public transport based on buses that rarely exceed overall average speeds of 10 to 15 mph.
- A fuel efficient city is one where there is a good balance between automobiles and public transportation, walking and bicycling; an intensive, more centralized land use system; and high levels of traffic restraint.

The results are clear. Reducing congestion without taking effective measures to reduce the demand for low AVO transportation will result in more automobile travel, more fuel consumption and more pollution.

The CMP does indeed include a transportation demand management element. But will the proposed measures be effective in containing demand? A look at the "Minimum TDM Strategies" (section 6.3.1 of the CMP) indicates that the answer to this question is "no."

Consider: Non-residential facilities of 100,000 square feet or more can satisfy the sample TDM ordinance by putting in bike racks, a vanpool loading zone and sidewalks leading into the development. These amenities could do absolutely nothing to decrease demand for road capacity, not to mention that the last time we looked, developments already came with sidewalks as standard equipment. In fact, the lists of TDMs are like a smorgasbord of randomly selected cuisines, thrown together without regard to whether or not the dishes complement each other.

← TDM
↓

Travel demand is regional problem and travel demand planning will not be effective if it is carried out in a piecemeal, site by site manner. The TDM element of the CMP must look at several levels simultaneously in developing a travel demand program. At the individual site level, developments should not be required to implement certain measures but to attain certain *performance standards*. This is how the AQMD promulgates many air quality regulations. In effect, they demand results but don't necessarily

mandate the means. An ounce of prevention is worth a pound of cure. Instead of letting developers loose and simply charging a mitigation fee (which amounts to shooting yourself in the foot and then slapping a tourniquet on it), require that new developments be designed so that they inherently place less burden on the transportation system.

This brings us to the next level of demand management. How can we guide urban development towards a more efficient transportation system. This can be done through land use incentives which encourage density near transit stations and mixed use development to provide job-housing balance. Toronto's experience is quite illuminating. Through zoning and incentives to developers, half of all apartments built since 1954 are within walking distance of a rail station as well as 90% of all new offices (Lowe, 1990). In fact, from an airplane, Toronto's rail stations are clearly marked by the dense clusters of development around them. Over the next several years, the Basin will be developing several new rail facilities. This is *our* opportunity to seize the efficiencies provided by public transportation combined with dense development.

Even given the measures above, the most important goal of the CMP should be to remove the single occupant vehicle from our streets and freeways. In the words of the Environmental Defense Fund, "no amount of additional highway or transit capacity will restore mobility or clean air if the policies governing management and use of transportation resources do not incorporate true costs into the price of auto use" (Cameron, 1991). Whenever a driver takes a trip, he or she imposes delay on other drivers and air pollution on everyone. These costs total over \$16 billion dollars per year or about 17 cents per mile yet they need never be taken into account by the drivers who impose them. If commuters were made to bear these costs directly through congestion and smog charges, they would be more likely to seek other modes of transportation besides the single occupant automobile. Congestion charges would take the form of peak hour use fees and smog charges could be assessed at registration based on miles driven and emissions performance. The available evidence indicates that each 1% increase in the price of driving leads to as much as a 0.25% decrease in travel (Cameron, 1991). Technology exists to implement such charges without the need for toll booths.

These measures alone could go a long way to reducing travel demand but there are still more hidden costs of driving. They include free parking and sales tax surcharges that go towards road building. By one estimate, free parking induces more travel than free gasoline would (Cameron, 1991). What's more, free parking could be eliminated without harmful impacts on low income employees either by a revenue neutral system that rewards carpoolers and charges single occupant vehicles or simply by paying employees the cash equivalent of the parking space.

In summary, the TDM element should include the following:

- Instead of letting developers select from a hodgepodge of ineffective measures, require them to meet certain standards that limit the burden they can place on the Basin's transportation resources.
- A plan for instituting economic incentives such as congestion and smog charges and elimination of parking subsidies. These will encourage more efficient use both of roads and public transportation.
- Means for encouraging denser development along rail corridors and mixed use development to put jobs and housing close together. With so many individual jurisdictions in the basin, perhaps effective zoning regulations are a pipe dream. However, LACTC can use the mitigation fee to work the same way. For instance, mitigation fees could be set based on distance from a transit stop or degree of mixed use development. This will minimize the burden of new development on the Basin's transportation resources and use those resources more efficiently. In effect, mitigation fees can work as a market incentive which forces the market to take account of the true costs of its actions.
- Don't fund new mixed use road building. The Basin already has plenty. Create programs that encourage more efficient use of existing road capacity.
- Angelenos want to be able to get from point A to point B. What we're saying is that point A and point B ought to be closer and there ought to be more mobility options for getting there.

↑
TDM
↓

The Coalition believes the Transportation/Land Use/Air Quality Connection discussed above is the most important issue in the effectiveness of the CMP. We would now like to comment on some of the other aspects of the plan.

Level of Service (sec 4.1.1): The CMP establishes level of service (LOS) standards for freeway segments and intersections. The nominal minimum standard is "E", or speeds of about 35 miles per hour with unstable flow on freeways or delays of several signal cycles at intersections. However, if a route is already at LOS F (speeds less than 20 mph) it may remain there. In fact, exhibit 7 indicates that most of the major roads in the county are currently at LOS F. It is hardly defensible to have a *congestion management program* that allows an unacceptably congested freeway to stay that way. As it stands now, the CMP institutionalizes gridlock rather eliminating it.

CMP Transit Component (sec 5.1): The plan states that LA County has "an extensive public transportation system." In reality, only a few percent of passenger miles are accounted for by public transport. Moreover, the fact that LA has more route miles of bus service than any other city is more a measure of sprawl than of efficient transit service. In Newman and Kenworthy's cluster analysis of transportation and land use characteristics of principal world cities (NK, 1988), Los Angeles fell into the group of cities with the worst balance between autos and public transportation. In addition, Los Angeles had the worst quality of public transportation in that most of the system consists of low speed buses instead of high speed rail. The plan should proceed from the well established fact that we have one of the least effective public transport systems in the world and go on to tell us how that situation will be remedied.

TRANSIT

The plan mentions the "extensive rail system" that is currently being developed but provides no projections of future occupancy and how that will impact regional mobility. There are also no projections of how different future land use measures, such as increasing density around rail stations or balancing jobs and housing, will improve mobility or reduce demand. Finally, the CMP should include provisions for developing a ridership base for the new rail facilities through public outreach activities.

Bias for Autos Over Public Transit (sec. 5.2.1, sec. 5.5):

The tone of the CMP reflects LACTC's bias towards freeways to solve our congestion problem. In a number of places the CMP concerns itself with rail only in its "potential to relieve traffic congestion on the CMP Roadway Network." In other words, the place of rail in LA transportation is to funnel off enough would be road users to maintain convenient driving - the most resource intensive and environmentally destructive transportation mode. The goal of congestion management should be to find ways to unseat single passenger autos as the primary mode of transportation in the Basin. Anything less is underpowered and incapable of driving away smog.

TRANSIT

Park and Rides (sec. 6.4.1): While park-and-rides decrease congestion and running emissions, they do not decrease total vehicle trips. According to the AQMD, cold start and hot soak emissions account for 26% of emissions from all catalytic converter equipped cars (AQMD, 1990). These emissions can only be reduced by reducing the number of trips. Thus, while we recognize the value of park-and-ride facilities, an even better solution would include initiatives to promote large scale carpooling to park-and-ride lots along with bus or shuttle service to avoid the need for cars altogether.

Land Use/Transportation Impact Analysis (sec. 7.2): This section proposes that developments over a certain threshold size analyze their impact on the transit system. However, sec. 7.2.5 indicates that up to half of new development is below the City's threshold for traffic impact analysis and goes on to state that "The impact of small development, therefore, has a significant impact on the regional system." The CMP is not clear on how it will deal with the substantial effect of small development on the transportation system. Here we can make an analogy to the CEQA process which determines *cumulative impacts*. LACTC should use the same type of framework to examine regional mobility questions. Once again, a countywide mitigation fee set to encourage the right kind of development can remove the need for extensive analysis on a case by case basis.

Although a mitigation fee will be instituted to address the impact of development, such a fee is only useful to the extent that it provides the right incentives. For instance, fee structures that encourage dense development around rail stations or affordable housing near jobs will encourage more efficient use of transit resources. However, a fee structure which doesn't nudge development into the

right areas but simply allows developers to "buy" their way out of responsible development will, once again, be more like putting a band-aid on a bloody gash. As with many other aspects of life, the best way to manage congestion to prevent it from occurring in the first place, i.e., to create an urban form that reduces demand for automobile transportation.

CMP's Disjointed Approach: One of the major shortcomings of the CMP is that it fails to treat the urban system holistically, instead choosing to throw together a hodgepodge of different measures, each of which individually may reduce congestion but when taken together are likely to increase both congestion and air pollution. We've already discussed how decreasing congestion encourages more driving and how the TDM measures appear to have been pulled out of an urban planning textbook with a cookie cutter and stapled together. In the case of improving LOS at intersections, individual jurisdictions have two means at their disposal. They can increase capacity or spread out development. Each of these "solutions" increases air pollution and perpetuates the urban design (or, more correctly, lack of design) that got us into our current predicament. Long term service of both air quality and congestion goals demands improvements in LOS through reduction in vehicle miles traveled and in total trips. This can only be accomplished through means, such as those described above, that put people near their jobs or near public transit and that force drivers to pay the true costs of their behavior.

Local Compliance With CMP Measures: The CMP largely relies on local jurisdictions for its implementation. Among other things, local governments must develop and enforce TDM ordinances, assess impacts of new development and monitor levels of service. However, experience indicates that local governments can not be relied on to perform these tasks adequately. The 1989 Air Quality Management Plan relied on local governments to implement measures that would have accounted for half of all the emissions reductions from transit. The Southern California Association of Governments conducted a survey in August of 1990 to assess their progress. More than half of the 142 local governments didn't even bother to respond. Of the rest, less than half had taken, or were planning to take, any action. The CMP will only be effective to the extent that LACTC can encourage or enforce compliance by local jurisdictions.

Conclusion

The CMP contains vague statements about coordination with other transportation commissions and with AQMD but no actual plans are laid out. If there is going to be real coordination with these other agencies, why not produce one overarching CMP that subsumes the county CMPs? LACTC is in a position to take a lead role in producing a CMP for the whole Southland - one that will treat the entire basin as an integrated urban system. Congestion and air pollution are regional problems that can't be solved piecemeal by the uncoordinated actions of multiple local and regional bodies. The CMP should at least contain far more definite plans concerning just how the different counties will coordinate their activities. Air pollution and congestion do not recognize political boundaries; neither should we when developing the plan to solve them.

References Cited

Cameron, Michael, *Transportation Efficiency: Tackling Southern California's Air Pollution and Congestion*, Environmental Defense Fund and Regional Institute of Southern California (1991).

Lowe, Marcia D., *Alternatives to the Automobile: Transport for Livable Cities*, Worldwatch Institute Paper 98 (1990).

Newman, P.W.G, and J.R. Kenworthy, *The Use and Abuse of Driving Cycle Research: Clarifying the Relationship between Traffic Congestion, Energy and Emissions*, *Transportation Quarterly*, 38(4), 615-635 (1984).

Newman, P.W.G, and J.R. Kenworthy, *The Transport Energy Trade-Off: Fuel-Efficient Traffic Versus Fuel-Efficient Cities*, *Transportation Research A*, 22A, 163-174 (1988).

South Coast Air Quality Management District, *1987 Emissions Inventory for the South Coast Air Basin: Average Annual Day*, Draft Appendix III-A, December 1990.

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South Coast
AIR QUALITY MANAGEMENT DISTRICT
21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (714) 396-2000

204773

January 16, 1992

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COPY TO FILE

Mr. Brad McAllester
Manager, Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street
Los Angeles, CA 90017

Dear Mr. McAllester:

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Congestion Management Program for Los Angeles County

SCAQMD# LAC911217-01

1992 JAN 17 2 15
L. H. ...

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report (Draft EIR) for the Congestion Management Program (CMP) for Los Angeles County. SCAQMD is responsible for adopting, implementing, and enforcing air quality regulations in the South Coast Air Basin, which includes the study area. As a responsible agency, SCAQMD reviews and analyzes environmental documents for projects that may generate significant adverse air quality impacts. In this capacity, SCAQMD advises lead agencies in addressing and mitigating the potential adverse air quality impacts caused by the project.

The following is provided to assist the Lead Agency in the preparation of the air quality analysis. This information should be included in Draft EIR's submitted to SCAQMD:

- o Baseline Information: Describe existing regional climate and air quality and site specific ambient air quality from the District monitoring station located in project source receptor area;
- o identify and quantify all project emission sources;
- o identify and assess toxic source emissions within the study area;
- o assess cumulative air quality impacts from potentially related projects;
- o identify and quantify project alternatives that may attain the goals of the project with substantially fewer or less significant impacts;
- o compare and assess anticipated project emissions with SCAQMD's thresholds for significance and existing air quality of the region and study area;
- o identify mitigation measures necessary to substantially reduce air quality impacts; and
- o assess consistency of project with AQMP.

January 16, 1992

For additional information please refer to SCAQMD's 1992 Air Quality Handbook for Preparing Environmental Impact Reports to assess and mitigate adverse air quality impacts.

SCAQMD has a prescribed role in the development and implementation of the CMP. In accordance with State CMP legislation (Section 65089.3(C)), SCAQMD is assigned the responsibility of establishing and periodically revising a list of improvements, programs, and actions which local agencies can select from to address CMP deficiencies. Legislation also requires the lead agency to consult with the District during the preparation of the CMP. In addition, if any trips are exempt from the modeling analysis, then consultation with the District is required.

All elements of the CMP should be consistent with the Air Quality Management Plan (AQMP). In particular, the CMP should be consistent with the growth forecast used in the AQMP and should implement all AQMP transportation control measures (TCMs). As you are aware, the deficiency plan of the CMP should include actions that go beyond AQMP programs and actions. This can be accomplished by accelerating AQMP TCMs and adopting more stringent TCMs than those identified in the AQMP or measures that are not identified in the AQMP. CMP legislation specifically states that deficiency plans must result in a significant benefit to air quality. District Staff has appreciated working with LACTC on developing a deficiency plan.

Upon completion of the Draft Environmental Impact Report, please forward two copies to :

Office of Planning & Rules
South Coast Air Quality Management District
21865 Copley Drive
P O Box 4939
Diamond Bar CA 91765-0939

Attn: Local Government - CEQA

If you have questions regarding the environmental analysis, please call me at (714) 396-3055. If you have questions regarding the review of the CMP or deficiency plan, please call Alene Taber at (714) 396-3057.

Sincerely,



Connie Day
Program Supervisor
Environmental Review

CAD:VL

MEMORANDUM--CITY OF PASADENA

TO: Nancy Key

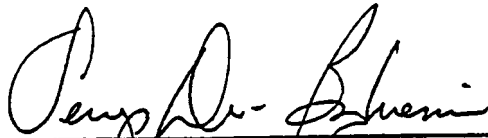
DATE: January 16, 1992

FROM: Transportation Manager
and Traffic Engineer

RE: Congestion Management
Program Initial Study

This is in response to your request for comments on the CMP notice of preparation (NOP) and initial study (IS). After reviewing the Scope of Work and content of the EIR, staff is in agreement with the material and therefore have no written comments.

We appreciate the opportunity to comment on the NOP and IS. If you have any questions, please contact me at (818) 405-4262.



SEROP DER-BOGHOSSIAN
Transportation Manager and Traffic Engineer

KM: bjr
Traffic Engineer



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PLANNING DEPARTMENT
11333 VALLEY BLVD • CITY HALL WEST
EL MONTE CALIFORNIA 91731
TELEPHONE (818) 580-2090

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HAROLD O JOHANSON
DIRECTOR OF PLANNING AND
COMMUNITY DEVELOPMENT

January 15, 1992

Brad McAllester
Los Angeles County Transportation Commission
818 West Seventh Street
Los Angeles, CA 90017

Dear Mr. McAllester:

RE: Response to Notice of Preparation for the Congestion Management Program for
Los Angeles County

Thank you for allowing us the opportunity to review the Notice of Preparation. The City of El Monte feels that one of the most important components of the CMP is the seven year capital improvement program. I would, therefore, like to take this opportunity to include two additional projects to the draft projects list. The first project is an underpass at the intersection of the Southern Pacific Railroad tracks and Ramona Boulevard/Cypress Avenue. The total project cost is \$15.2 million. The second project is an underpass at the intersection of the Southern Pacific Railroad tracks and Tyler Avenue. The total project cost is approximately \$6.2 million. These grade separations are necessary due to the existing train volumes on the track (currently 39 trains per day) and the fact that the volume will increase when the commuter train begins operation.

If you have any questions or I may be of further assistance, please call me at (818) 580-2090.

Sincerely,

Harold O. Johanson
Director of Planning and Community Development

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bureaucratic rug will not solve the critical problems facing the American people.

We find that the CMP relies far too much on the highway element. The role of highways is still largely misunderstood. Highway capacity creates demand for travel; it does not satisfy it. By temporarily relieving traffic congestion, latent trip demand is encouraged to come out of the woodwork; developers are encouraged to buy and to develop cheap real estate on the periphery of the cities. The process actually creates congestion. We would like to see the CMP revised to comment on a much more reasoned approach to the rebuilding of our public transportation infrastructure.

We note that the CMP Transit Element monitoring network "...is intended to serve as a planning tool...to make transit a more effective traffic mitigation strategy." Transit should not be conceived as a means of "mitigating traffic congestion"; it should be seen as an efficient, less costly means of getting our citizens to their jobs and to provide a means of travel not now available to them. The difference is neither academic nor trivial.

TRANSIT

And, finally, we wish to call your attention to the overriding influence which has created the congestion problem in the first place. We refer to the subsidies--'free' parking, 'free' use of the highway network, and 'free' use of local government services. These subsidies have destroyed American public transit systems and railroad passenger service, thereby creating conditions which have made Americans utterly and pathetically dependent on costly automobiles and on an expensive highway system.

Of course, these 'free' services are not free. They are extremely costly; the cost of living is increased, our incomes decreased. The effect might be about 10% of GNP. The cost of automobile ownership is even greater; the total is probably 25% of GNP. The nation is thus impoverished, unable to generate the capital we need to compete in world markets.

We ask that this corruption of our marketplace economy, and its role in producing our urban transportation problem, be included in the revised CMP and noted in the writing of the EIR, as well.

Sincerely,



Stanley Hart, Chairman
Transportation Committee

cc: Bill Curtiss, SCLFD



RTD

Dana Woodbury
Director of Planning

204350

January 9, 1992

Mr. Bradford W. McAllester
Administrator,
Congestion Management Program
Los Angeles County Transportation Commission
818 West Seventh Street Suite 1100
Los Angeles, CA 90017

Dear Mr. McAllester:

Ref: Notice of Preparation of DEIR, Congestion Management Program for Los Angeles County

The Southern California Rapid Transit District has reviewed the Notice of Preparation, and offers the following comments.

As the Congestion Management Program is currently written, we believe that it is likely to have some environmental effects more serious than indicated in the Initial Study. In particular, we think items 21-b (potential to achieve short-term, to the disadvantage of long-term environmental goals) and 21-d (environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly) either will have, or may have, negative effects.

The rationale for these conclusions is covered in detail in the attached Board Report. Briefly summarized, we believe that the CMP emphasizes major highway corridors and high speeds, and in so doing, will cause a shift of resources away from lower speed and highly effective transit service, and thereby induce further spreading of the urbanization pattern, with concomitant increases in VMT, leading to worsened air quality and increased fuel consumption, and higher cost of living.

These are macro effects that are not so easy to analyze, but the EIR should make the best possible attempt to do so.

If you need additional information, please contact Joel Woodhull, Planning Manager, at (213) 972-4850.

Sincerely,

A handwritten signature in cursive script that reads "Dana Woodbury".

Dana Woodbury

Attachment



C.P.
GM
U

City of Lancaster

14933 North Fern Avenue
Lancaster, California 93534
805-723-6000

RECEIVED
CITY OF LANCASTER
JAN 10 1992
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January 8, 1992

Rev. Henry W. Hearn
Mayor

Wm. G. Pursley
Vice Mayor

Arnie Rodio
Councilman

George Lee Root
Councilman

George S. Theophanis
Councilman

James C. Gilley
City Manager

Mr. Brad McAllester
CMP Program Manager
LACTC
818 W. Seventh St
Los Angeles, CA 90017

Re: Congestion Management Program for Los Angeles County, County-Wide Mitigation Fee
Nexus Study.

Dear Mr. McAllester:

The following comments are provided for your consideration regarding the CMP and Nexus Study being discussed at the Policy Committee Meeting on January 8, 1992. The CMP and related issues remain a prominent concern of the City of Lancaster, and we again offer you our views to aide you in the development of the program.

- The inequity issue is still seen as unresolved in the current proposal. The majority of deficiencies in the County system are not within the North County/Antelope Valley area. Thus, a concern is raised regarding a clear link from any fee collected in this area to improvements that are a result of our development. It is doubtful, when considering the vast amount of County projects and their related costs, that any return of these fees to the North County area would happen soon. As you know this part of Los Angeles County has grown extremely fast and we are trying to properly plan for, and mitigate congestion problems before they arise.
- The CMP should not only prioritize existing congested segments of the highway system, but should also place a high significance on maintaining existing Level of Service on segments that might, in the future, become congested. A "Stop Gap" approach is seen as a never ending battle considering the current shape of the highway system.
- Will there be cost/benefit analysis for various "mitigation" measures. What occurs if a currently plan project (e.g. light or heavy rail) project costs exceed the cost of widening an existing freeway and the freeway will provide equal or improve Level of Service in the system? Are we prepared to look at alternative or is the system locked into certain programs?

Credits/discounts.

- Where is a credit for jobs/housing balance implementation that would remove trips from the system? Is that not a major goal in the reduction of congestion and commute mileage? This needs to be addressed.

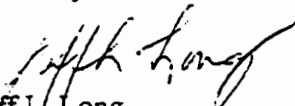
City of Lancaster

- "Trip discounts or fee reduction for development located within one quarter mile of a transit station" while understandable in intent, this discount is seen as duplicitous, with much emphasis being placed on providing priority for transit improvements in the Los Angeles core, metropolitan area. How and when would this credit be approachable for the Antelope Valley. Until that time the metropolitan area enjoys not only getting the transit improvements first but also received credit for them. Why not include credits for park-n-ride facilities, and providing facilities for alternate transportation modes?
- Where is the credit for above average per vehicle ridership rate? Was this not discussed previously? Is this included under trip credits? Areas such as the Antelope Valley have been in the forefront of increasing ridership levels, thus, reducing the need for costly roadway system improvements. Credit should be given for areas which exceed their AVR goals. Credits should be received as they relate to results not a "aggressive TDM ordinance" which may or may not result in reducing vehicle demand or volumes.

TDM,

As you can see, there are many items of concern that still remain regarding the CMP and the impact fee development. We fully understand the intent and aim of the CMP and its attempt to rectify today's congested areas. We only ask that as much emphasis be placed on areas of future growth so that congestion never occurs as a result.

Sincerely,


Jeff L. Long
Director of Public Works

TSB:bm

cc: Peter Beaudry, Traffic Engineer
Timothy S. Bochum, Assistant Traffic Engineer
Tom Horne, City of Palmdale
Patricia McLaughlin



Alan F. Pegg
General Manager

Neil Peterson
Executive Director
Los Angeles County Transportation Commission
818 West Seventh Street
Los Angeles, California 90017

Re: CONGESTION MANAGEMENT PROGRAM FOR LOS ANGELES COUNTY -
FINAL DRAFT

Dear Mr. Peterson:

The Southern California Rapid Transit District has completed its review of the Congestion Management Program (CMP) documents dated August 14, 1991. The District has many concerns regarding the program and believes that these concerns should be addressed before final adoption of the CMP.

Overall Appraisal: A Transit Element That is Subordinate to Highway Concerns is Suboptimal.

While the CMP should be commended for adopting some District suggestions about the Transit Monitoring Network, its approach to the transit system will likely yield suboptimal results. The CMP approach subordinates the needs of the transit system to highway and roadway considerations, such as the maintenance and improvement of roadway Level Of Service (LOS). It does not consider congestion management problems unique to the transit system such as overcrowding and passenger pass-ups.

The transit element of the CMP is directly tied to the CMP Highway Network. The only transit routes on the CMP Transit Monitoring Network are those that have a majority of their mileage, or at least 5 miles, in a CMP corridor (on the CMP highway or parallel to it). This subordinates the transit network to the highway network. The subordination is explicit in the preamble to the Transit section: "The purpose of this requirement is to make most effective use of public transit service as an alternative to the automobile with an emphasis on alleviating congestion on the *CMP highway and roadway system.*" (Italics added). As a result only a subset of the transit system is targeted, emphasizing long distance, line haul travel. Only 90 of 250 transit routes in the region are included.

The subordination is predicated on some unwarranted inferences about the State's enabling legislation for CMPs (AB 471). The Legislative Findings and Declarations of AB 471 say that a lack of an integrated transportation system is creating a congested highway system; but the legislative language does not say that transit subordination is either necessary or wise. The legislation specifies that Highway LOS standards and transit frequency and routing standards are to be established, and that a 7 year capital program is to be developed to maintain or improve

both the highway LOS and transit performance. The legislation does not indicate whether establishing two independent systems with distinctive (but symbiotic) functions would be a better strategy for congestion management than making one system serve the needs of the other.

The key to making transit an effective part of an integrated systems solution is to resolve transit capacity insufficiencies, not to make roadway concerns a condition of transit recommendations. Until problems unique to transit are addressed, the transit system will never fully achieve its potential contribution to congestion management. The CMP's conditional approach to transit has resulted in the omission of many of the most boarded, most intensely used, and most crowded bus lines from the Transit Monitoring Network. Even if it were granted that congested highways should take priority, the proposed transit element is still too insensitive to transit system dynamics to optimize solutions. As a matter of prudence, some consideration of these dynamics should be incorporated to mitigate unintended negative consequences.

How Congestion on the Transit Network Differs From Congestion on the Roadway Network

The roadway system is made up of a hierarchy of roads: secondary roads, collectors, arterials, major arterials, expressways and freeways. Congestion tends to get worse as travelers progress up the hierarchy. The opposite is true for transit in Los Angeles. Local service is far more congested than express and long haul express service. Currently, RTD has 24 lines that carry 19,000 or more passengers per day, only 2 of which (Lines 420 and 424) are express lines. Similarly, it has 22 lines that can be said to be extremely productive because they board over 66.6 passengers per revenue hour. No express line is among these most productive lines. Similarly, using the best indicator of overcrowding, the percentage of passengers who are forced to stand (more specifically, standee miles divided by passenger miles expressed as a percentage), only 2 express lines are among the 21 most overcrowded with 12.5% or more passengers standing during rush hour (Lines 424 and 434).

By looking only at the lines on, or parallel to, the CMP highway system, the Transit Monitoring Network ignores some of the most heavily boarded and some of the most congested transit lines in the County. The system includes several express lines that have excess capacity. As a matter of prudence some of the omitted lines should be included: some because they are so productive that the routes they serve carry more people than some of the arterials included in the CMP Highway and Roadway Network, others because they are overcrowded. In either case, the ignored routes either cross roads on the CMP network, serving as important distributors (via transfers) of network travelers, or they serve as major auto travel substitutes.

Only 11 of the 24 lines with 19,000 or more patrons per day are on the Transit Monitoring Network. A transit systems approach would include all of them. At the very least, Line 204 (57,000 patrons), Line 30 (38,000 patrons), Line 207 (37,000 patrons), Line 1 (31,000 patrons), and Line 45 (29,000 patrons) should be included. A criterion for putting an arterial on the CMP Highway Network is that it carry over 30,000 vehicles a day; an analogous criterion for transit would count people rather than vehicles. Any transit line with 19,000 passengers will contribute to a corridor that necessarily will be carrying a large volume of people. This criterion would also account for the resources that RTD has to commit to these lines.

Neil Peterson

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Similarly, only *5 of the 22* most intensely used lines, using boardings per revenue hour as an indicator, are included in the Network. Again, a transit systems approach would include all of them. At least Lines 204, 207, 16, 206, 30, and 210 should be included since they are all among the top ten most intensely used.

Similarly, only *10 of the 21* most overcrowded lines, using the standee ratio as the indicator, are included in the Network. They, too, should be included. At least Lines 16, 38, 204 and 210 should be included since they are among the 10 most overcrowded.

The omission of Line 204 is especially troubling since it is the most intensely used, the second most boarded, and the 7th most overcrowded in the system. Five of the omitted lines (Lines 16, 45, 204, 207 and 210) are among the most in need of monitoring according to all three of the aforementioned criteria (patronage volume, intensity of use, and overcrowding).

Overemphasis on Long Distance Trips

The Transit Monitoring Network overemphasizes long distance, line haul transit travel, making it a clone of the highway network. This is not where transit can, or will, make its most important contributions to relieving transportation network congestion. While the transit system does provide important long distance service, it has other equally important services: feeder service (allowing people to complete their trips, whether the modal origin is a long haul bus, rail, carpool or auto) and short haul transportation (allowing people to use transit instead of auto travel, especially in congested or densely populated areas where auto travel is inconvenient and expensive).

The CMP is supposed to be consistent with the Regional Mobility Plan (RMP). The RMP proposes a three-tiered transit system composed of line haul transit, local bus service, and neighborhood circulators all tied together by timed transfers at transit centers. While the CMP supports the line haul network by proposing to construct High Occupancy Vehicle (HOV) lanes and transit centers, the need to relieve overcrowding of local transit services is not addressed. The underemphasis of local service is evident in the composition of the CMP Transit Monitoring Network which includes more SCRTD express bus lines than local lines.

The emphasis on building HOV lanes is not going to make transit more cost efficient. Transit stops are far apart on HOV routes; few fare transactions take place over very long distances. HOV services currently have, and probably will continue to have, a lower farebox return than local services. Very little can be done to overcome the advantage local buses have due to their constant, and frequent, stream of fares and boardings.

Funding Concerns

The development of a suboptimal Transit Monitoring Network raises funding concerns. Although LACTC staff has assured transit operators that the network is for monitoring (not funding), the CMP document states that new transportation funding should be focused on services that have the greatest potential to mitigate traffic congestion, and that the proposed CMP

Neil Peterson

Page 4

is an adequate means-of assessment. It also lists Proposition C funds as a potential source of CMP funding. If transit monitoring is to be more than an empty exercise, then the lines included in the network, many of which are less congested than ones which are excluded, will be at a competitive advantage in CMP funding decisions. If Proposition C revenues are diverted from transit operations to CMP capital projects, then operating budgets could be significantly impacted. If the Transit Monitoring Network continues to emphasize long haul over local service, then capital investment decisions might tend to move away from supporting the services with the most demand.

RTD data is being used to demonstrate that long haul service is being systematically overemphasized in the CMP. It is important to note that *all* bus operators will be affected, especially by the overemphasis on rail. Where the CMP does support bus transit it overemphasizes express service. Transit operators with extensive local service will be doubly impacted by these dual emphases.

Another budgetary consequence of the CMP will be demand for additional District staff time. Under the plan, cooperation between local jurisdictions and transit operators is required to assess the impacts of new development on transit operations, and to verify that there is enough capacity on existing services to accommodate new trips assigned to transit. Thresholds for involving transit operators in the local review process include residential developments of 500+ dwelling units, shopping/trade centers that employ 1,000+ people or contain 500,000 square feet, office buildings that employ 1,000+ people or 250,000 square feet, and sports/entertainment/recreation facilities for 4,000+ people per performance or 1,500+ fixed seats. No resources are identified to cover the additional staff time required by the development review process directed by the CMP.

Monitoring of Transit Standards

The Final Draft CMP proposes two standards with which transit operators are expected to comply. The first is a frequency standard computed by adding the number of AM and PM peak hour trips for all lines within a CMP highway corridor and dividing by two (i.e., it determines the average number of trips per peak period). The second is the routing standard, which is computed by multiplying the passenger miles per vehicle service mile times speed. The CMP calls this expression the mobility index.

The subordination of transit service evaluation to highway LOS concerns is carried over into the proposed mobility index. Speed is a principal component in the index calculation. Speed is a better *single occupancy vehicle (SOV)* performance indicator than a transit performance indicator, since SOV speed does not deteriorate as a function of picking up and discharging passengers. The more successful a transit line, the slower it may become because of dwell time. Using the mobility index as a standard may encourage an operator to move a line to a freeway from a parallel route, to avoid the slowdown of multiple stops along the way. Patronage on the line will drop although the mobility index could show an increase in what the CMP terms "passenger throughput".

Neil Peterson

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As formulated, the mobility index is neither a measure of passenger throughput, nor a measure of mobility, nor a measure of routing effectiveness. Applying the formula to two hypothetical communities called Highden City and Lowden City will illustrate this. The communities are identical except that the distances between everything are twice as great in Lowden City as in Highden City. Everybody travels to the same corresponding places, and they get there in the same amount of time. Everybody in Lowden City is moving twice as fast and going twice as far, so the mobility index is twice as high. But real passenger throughput is the same in each, as is mobility. One of the things lost in the phantom improvement is the fact that everyone in Lowden City is burning up almost twice as much fuel.

Ostensibly, the mobility index is only to be used to monitor transit route effectiveness. However, the index's bias can be illustrated by comparing how it weights transit and auto performance. According to Table 1, the combined scores of 10 SOVs are equal to 1 local bus. Eliminating speed from the formula would make the local bus performance equal 21 SOVs. For technical reasons, this kind of comparison probably should not be made (although, doubtless it will be). Notwithstanding technical arguments, it is clear that the current index grossly discounts the value of bus travel. Table 1 also shows that express buses, according to the index, are better performers than the more heavily loaded local buses. Neither of these findings are sound from the perspective of jobs/housing balance, trip reduction, or transit economics. The CMP mobility index does not place enough emphasis on the distinctive attributes that separate the contributions of each mode. Intermodal comparisons are awkward. The contribution of the local bus to congestion management is no less than the contribution of an express bus or rail service. Each mode has a unique contribution to congestion management, yet the mobility index places greater value on the faster vehicles' contribution.

Most transportation analysts believe that speed is an important element of congestion management for the roadway system; but an improvement in overall traffic speed can be a mixed blessing for transit. If the relative speed of non-transit vehicles were to increase more than that of transit vehicles, then transit would be placed at a competitive disadvantage. In particular, this would occur if transit were not to receive an analogous investment in improvements. Relative, not absolute, modal speed should be the major concern of a transit oriented congestion relief analysis. The CMP should require transit operators to take part in roadway project review in order to ascertain potential negative transit impacts, and to suggest possible mitigations.

There are also problems with using the other component of the index: passenger miles per vehicle mile. If bus overcrowding were reduced in a corridor by a lowering of the load standard, then the mobility index would indicate a *deterioration* of service, not an improvement. This is a clear example of the index's insensitivity to transit, and transit users. In this case the index would encourage overcrowding, which would drive patrons away. The index would be self-defeating as a congestion management standard.

There are two additional concerns with the mobility index. First, a corridor's mobility index is determined by taking the average of all lines without regard for the amount of service provided. Instead, an appropriately weighted average for each corridor should be calculated. Second, the CMP uses erroneous data to calculate the mobility index. For some District bus

lines, passenger miles are overstated by a factor of three or four. Monitoring of transit's contribution to congestion management cannot be precise if the baseline standards are incorrect. The District will provide complete and accurate data to the LACTC, and work to insure that it is appropriately interpreted.

The CMP ties passenger load standards to its frequency standard. The proposed 140% load standard for frequent local service (headways of less than 11 minutes) is much too high to attract discretionary passengers. The 140% load standard will engender overcrowded buses and passenger pass-ups. It will not provide encouragement to use transit. At best, a bus line using a 140% load standard is operating at the functional equivalent of a road with a Level E LOS. This should be so noted if this load standard is adopted. A better approach would avoid load standards that guarantee passenger discomfort, forcing people onto other shared riding modes.

An overall concern with the transit monitoring network is that the increased costs of monitoring will not be worth the expected payoff. When the District approached the LACTC about potential funding impacts, Commission staff dismissed these concerns by saying that the monitoring network was not a funding network. If the network has no impact on funding decisions, then it is not worth maintaining; if it has an impact, then (as the network is currently constituted) it will substantially move investment away from more optimal transit solutions.

Trip Fees

In the coming year, LACTC will develop a system of trip fees that can be applied to mitigate the unwelcome impact of new trips. The District commented previously on this aspect of the CMP in my June 11, 1991, letter. While none of the comments were adequately addressed due to the preliminary stage of trip fee development, they are still applicable, and the suggestions below are especially pertinent to District operations.

- Enough credits should be awarded to offset trip mitigation fees so that local jurisdictions can retain desirable development (especially near rail stations and in high-density transit corridors). This action will discourage leapfrog development, urban sprawl, and the expansion of suburb-to-suburb commuting patterns which substantially increase transit operating costs.
- A provision should be included to award credits for contributions that improve pedestrian flow; for example, sidewalk widening near rail portals and heavily used bus stops. In addition, a provision to add pedestrian amenities (such as pedestrian pockets at bus stops) to the Deficiency Plan list should be included.
- Precise language should be included that limits the consideration of bus turnouts as a mitigation measure or as a contribution worthy of earning credits. Bus turnouts on high-frequency routes hinder operations and create safety problems as buses are forced to merge into congested traffic streams. Further, bus turnouts are usually created at the expense of pedestrian flow as sidewalks are narrowed. Except in layover situations or in bus-only lanes like the El Monte busway or the Spring Street contraflow lane, bus

Neil Peterson

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turnouts improve automobile throughput at the expense of the pedestrian, passengers aboard buses, and the waiting transit passenger.

- A portion of the trip fee revenues should be dedicated to transit improvements.

Trip Credits

A method for local agencies to retain desirable development is provided in the form of "trip credits." The LACTC will award trip credits based on local contributions to major transportation improvements which add trip capacity to the CMP system. For example, the City of Los Angeles' contribution to Metro Rail construction will earn trip credits based on the number of trips carried by Metro Rail proportional to the City's contribution.

Trip credits will be assigned to local jurisdictions and can be used to offset unmitigated trips on the CMP network that would otherwise trigger the assessment of the countywide impact fee. Local jurisdictions can use the credits themselves, assign credits to specific development projects, or sell them to other jurisdictions. Credits can be used to offset the congestion impact of local public policy such as density at urban centers, rail stations, redevelopment areas, or enterprise zones.

If the trip fees are onerous enough and there are not enough credits to retain new development, then growth will probably occur in parts of the county where transportation infrastructure improvements are not in place, under construction, or even planned. For transit service efficiency, this should be avoided.

Transit/Land Use Coordination

Local jurisdictions are to be responsible for ensuring that transit operators have the opportunity to comment on the transportation impacts of specific projects. Model forms for reporting transit impacts or improvements are appended to the CMP. The forms do not require sufficient detail to allow transit agencies to fully evaluate the projects. Specific questions should be included on: site orientation to the street, placement of parking, walkway and entranceway access to transit, street furniture and other walkway amenities for transit patrons and pedestrians, proposed project employment/population densities, and intensity of land use.

CONCLUSION

In general, the transit component of the CMP is oriented to roadway categories and concerns. This will not encourage transit's distinctive contributions to the transportation system; it does not result in an optimal strategy for reducing overall transportation congestion. Developing frequency and routing standards that are germane to transit congestion, and monitoring strategies that are based on these standards will help optimize transit delivery systems which, in turn, will lead to an optimal transportation system.

Neil Peterson
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Notwithstanding the extended critique, the CMP represents funding opportunities not previously available to transit. The dangers alluded to represent a potential distortion of priorities due to funding availability which, in turn, will be influenced by proposed guidelines. A more transit sensitive approach is possible within the parameters of the CMP statutory requirements.

Sincerely,

Alan F. Pegg

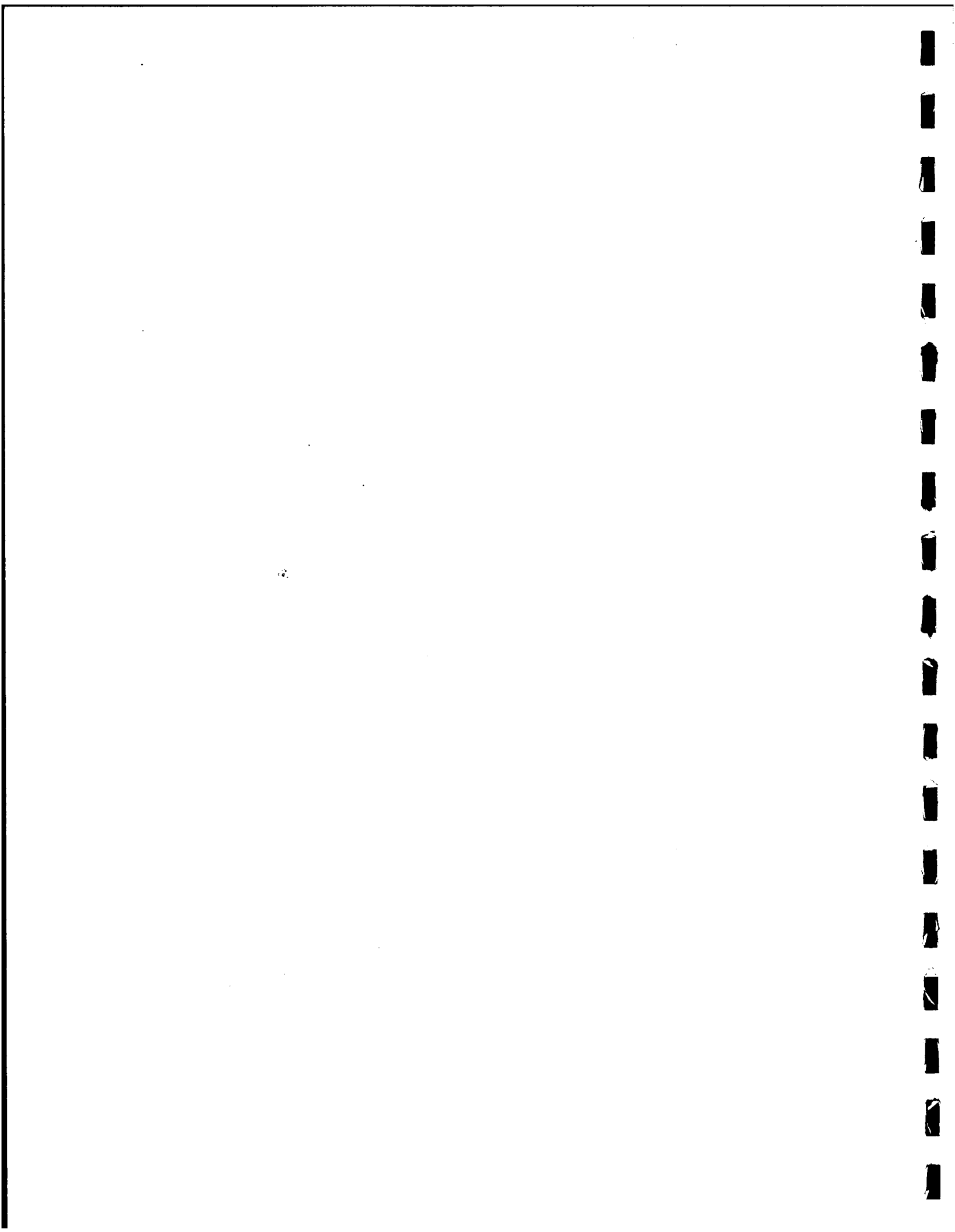
cc. Bus Operations Subcommittee Members

TABLE 1
 COMPARISON OF MODAL CONTRIBUTION TO CONGESTION MANAGEMENT
 BASED ON CMP MOBILITY INDEX

<u>MODE</u>	<u>RATIO OF PASSENGER MILES TO VEHICLE MILES</u>	<u>SPEED (MPH)</u>	<u>MOBILITY INDEX *</u>
Local Bus	21.4	11.2	240
Express Bus	18.4	16.2	298
Blue Line	38.8	21.7	842
Single Occupant Auto	1.0	24.**	24

* The Mobility Index is the ratio of passenger miles to vehicle miles times the speed.

** Based on SCAG Travel Atlas data.



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NP

Los Angeles Unified School District

Business Services Division

DAVID W. KOCH
Division Administrator, Business Services

C. DOUGLAS BROWN
Deputy Administrator, Business Services

BOB NICCUM
Director of Facilities Planning & Real Estate

WILLIAM R. ANTON
Superintendent of Schools

ROBERT BOOKER
Chief Business & Financial Officer

Environmental Review File
Congestion Management Plan

January 3, 1992

Brad McAllester
Manager, Congestion Management Program
Los Angeles County Transportation Commission
318 West Seventh Street, Suite 1100
Los Angeles, CA 90017

204387

Dear Mr. McAllester:

Thank you for providing us the opportunity to comment on the scope and content of the Environmental Impact Report for the Congestion Management Program (CMP). A careful and detailed analysis of public service impacts (schools) of the CMP should be provided in this EIR.

Reliance on an analysis which was provided not in the most [parent] Regional Mobility Plan EIR in 1988, but in the earlier Growth Management Plan which was not even reviewed by this school district, is not acceptable. Such an analysis is probably too far removed in time and reality from the actuality of impacts which the CMP will impose on school districts, and is far removed from the intent of the California Environmental Quality Act. Please therefore provide careful analysis of the CMP on schools.

We agree with the NCP discussion on page 13 which states that the CMP could result in a positive impact on public services. Since children are especially sensitive to air pollution, we support efforts to improve the air quality of the South Coast Air Basin. There are, however, two areas of concern to the District and we ask that you consider them during environmental review of the CMP:

- 1) The growth-inducing impacts of the Congestion Management Plan, especially in relation to schools, should be carefully analyzed. In many cases, phasing and location of transportation improvements will overwhelm the educational infrastructure, in that it will encourage growth in areas where schools are especially overcrowded (e.g., encouraging residential growth in areas of planned metro-rail stations may be beneficial in terms of transit and air quality, but not in terms of schools, because these areas typically are serviced by schools which are already way above-capacity). Broadly-defined mitigation measures should be provided in the CMP to avoid or to compensate for such impacts. Examples of such measures are provided in the attached letter. Additional measures should be added to facilitate construction of educational infrastructure in these areas.

Brad McAllister

- 2 -

January 8, 1982

2) Certain traffic improvements may result in air emission "hot spots", and in unacceptable noise levels near schools. An example of such incompatibilities may be the proposed terminal parking lot across from Farman Junior High School at Warner Center. The EIR for the CME would be the appropriate document in which to provide a detailed study on air emission criteria for such "hot spots" where there are located close to sensitive receptors such as schools. What mitigation measures (e.g. installing state-of-the-art air conditioners and exhaust systems in affected schools) can be provided to ensure that children are not exposed to harmful pollutants? Similarly, such analyses should also be provided for noise.

The NOP states that the demands of the CME could direct resources from the provision of other government services. Since the EIR includes a section on financial strategies for accomplishing the plan, please analyze the plan in terms of the financial impact on the District, and the extent to which these costs may be borne from monies currently used for educational programs.

Please incorporate by reference the attached copy of the letter into this response. Thank you for your consideration of our concerns. We will be pleased to work with you to incorporate the EIR for the Congestion Management Program.

VERY TRULY YOURS,

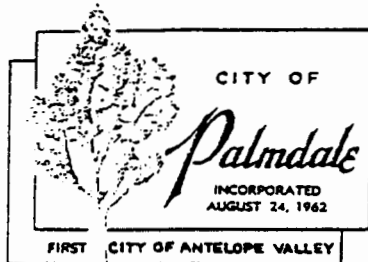
Elizabeth J. Harris

Elizabeth J. Harris

California Environmental Quality Act Section
for the Los Angeles Unified School District

Attachment

cc: Mr. Brown
Ms. Longland
Mr. Niccum



CITY OF PALMDALE

January 8, 1992

204363

Wm. J. "Pete" Knight
MAYOR
Joseph P. "Joe" Davies, Jr.
MAYOR PRO TEM
Janis C. Hamm
COUNCILMEMBER
James C. Ledford, Jr.
COUNCILMEMBER
James A. Root
COUNCILMEMBER

Mr. Brad McAllester
CMP Program Manager
Los Angeles County Transportation Commission
818 West Seventh Street
Los Angeles, CA 90017

RE: Congestion Management Program for Los Angeles County,
County-wide Mitigation Fee Nexus Study

Dear Mr. McAllester:

The following comments are provided regarding the subject study, which is scheduled for discussion today at the CMP Policy Advisory Committee meeting. The comments parallel those previously provided regarding the Draft CMP. Since I only became aware of the meeting this morning, I will be unable to attend. However, please forward these comments and concerns to your consultants for consideration.

The nexus study and the proposed county-wide mitigations fees are a significant concern to the City of Palmdale. Please inform me of any way I can assist in this effort.

- The vast majority of deficiencies in the county are not in the Antelope Valley; however, the Antelope Valley is one of the most rapidly growing areas in the state. Contributions from Antelope Valley developments to a countywide fee would have little apparent chance of being used in the Antelope Valley. Any expenditure of Antelope Valley related fees in other areas of the county would have to be carefully and well justified. Our City Attorney shares this

concern. It is believed that the countywide impact fee was to be used to mitigate impacts of developments which cross jurisdictional boundaries and a clear nexus would be maintained.

- Some key concerns related to application of any collected fees are identified below.

1) If the deficient element is eligible for funds other than those collected through impact fees, what proportion of funding will be provided by the impact fees? For example, if a freeway under Caltrans jurisdiction requires widening, how much of the widening costs will be paid through state, federal, or other fund sources vs. impact fees, and how will equity be maintained among jurisdictions? It appears possible that one city may have to pay a high proportion of costs while another city may pay a low proportion. An imbalance of shares may be considered equivalent to an absence of nexus.

2) If an element of the transportation system is not currently deficient but may be in need of improvement in the future due to cumulative development, may the collected fees be applied to the future improvement of the transportation element. For example, the Antelope Valley Freeway currently operates at an acceptable level of service in some areas; however, it will eventually require improvements. If countywide or other fees are collected for deficiencies and spent elsewhere, collection of fees for widening of the freeway may not even begin until the deficiency results.

- The CMP does not appear to provide any credit or consideration to impacts of improving the jobs/housing balance in a city or area. Since this may assist in mitigating deficiencies and/or reducing impacts (and is a concern identified in the Regional Mobility Plan) it is suggested that some form of credit or incentive be included in the CMP for improvements in the balance. In the City of Palmdale, this is an important activity which will alleviate some concerns for impacts on State Highway 14 and other commute routes to and from the Antelope Valley.

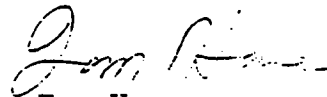
CMP Nexus Study
January 8, 1992
Page 3

- Further information is needed in order to evaluate the types of credits identified in the Meyer, Mohaddes Associates, Inc. memorandum dated December 30, 1991. There is a concern for the restriction on trip credits to public agencies which is discussed.

In essence, there is a significant concern that the mitigation fee system will adequately address the varying levels of congestion, development activity, and funding needs throughout the County. The CMP, as the name implies, is strongly directed toward county areas which have severe congestion problems currently. Please consider the needs of areas which are attempting to properly plan to avoid congestion in the future.

If I may be of any assistance, please contact me.

Sincerely,



Tom Horne
Traffic/Trans. Engineer

TWH/5259

cc: Robert Toone
Steve Williams
Doug Dykhouse
Dolores Buddell-Teubner
Fred Buss
Michael Colantuono
Patricia McLaughlin
Tim Bochum





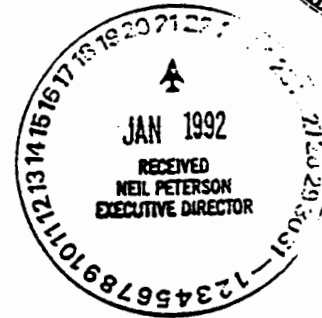
Los Angeles County
Department of Regional Planning

Director of Planning, James E. Hartl, AICP



204794

January 8, 1992



Neil Peterson
Executive Director
L.A. County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Dear Mr. Peterson:

SUBJECT: NOTICE OF PREPARATION OF AN EIR FOR THE LOS ANGELES COUNTY CONGESTION MANAGEMENT PLAN

Thank you for the opportunity to comment in response to the notice of preparation of a draft Environmental Impact Report (EIR) for the Congestion Management Program (CMP) for Los Angeles County. The Department of Regional Planning recommends that the draft EIR address the economic impacts of the proposed CMP including the possibilities that properties on a CMP route may lose value, and that congestion mitigation projects along CMP routes may force displacement of fronting activities possibly displacing badly needed housing and jobs. The EIR should examine the possibility that mitigation fees may constitute an expense that will discourage activities that create jobs and housing (including low cost housing), and thus contribute to the economic decline of the County and its tax base.

The EIR should also examine the possibility that single focus emphasis on traffic movement may negatively impact neighborhood unity and cohesion. Finally, DRP staff recommends that the potential impact of congestion mitigation actions on landmark trees and other landscaping plantings be evaluated.

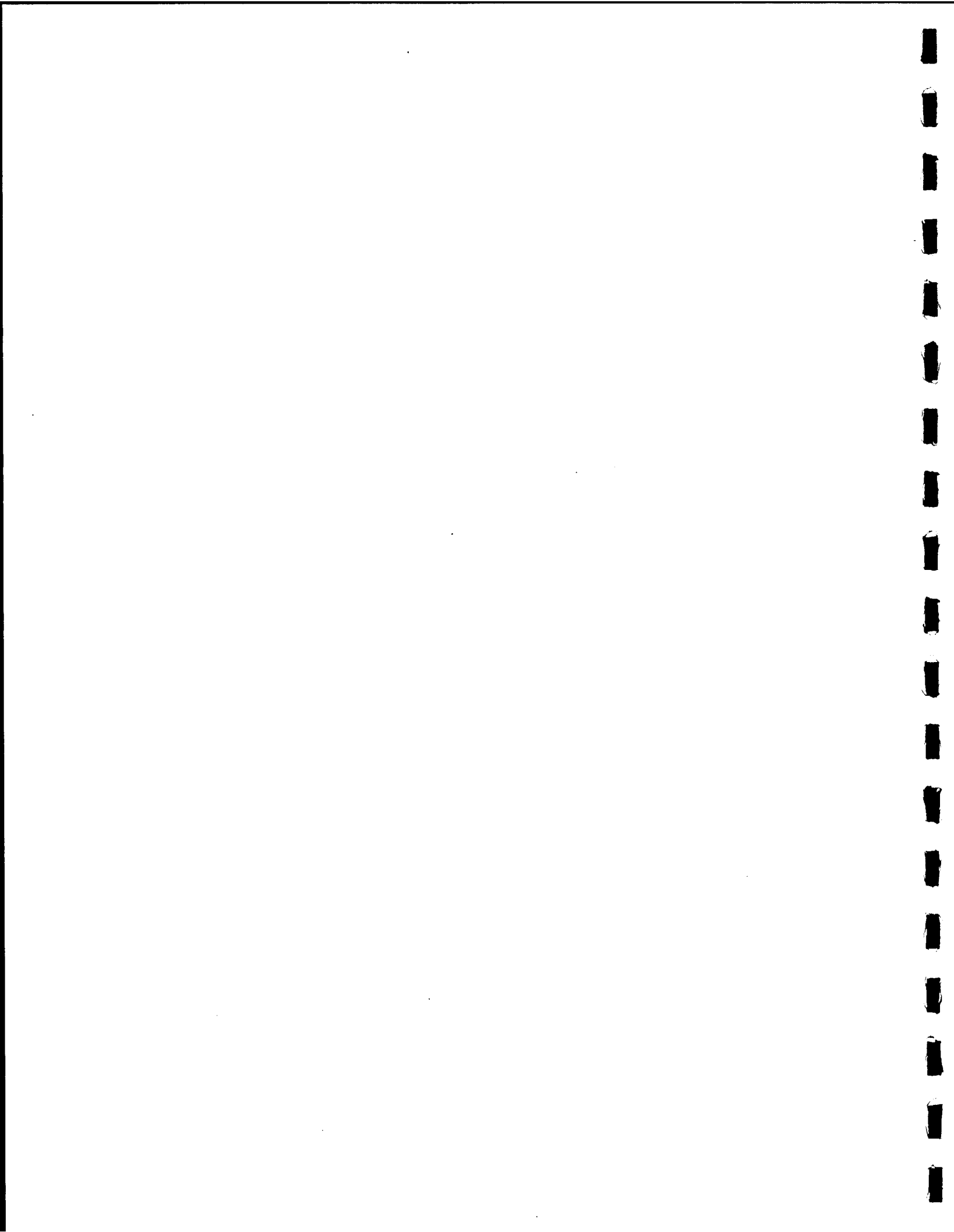
DRP staff agrees with the determination that an EIR is necessary. If you have questions, please call Jene McKnight at (213) 974-6464.

Very truly yours,

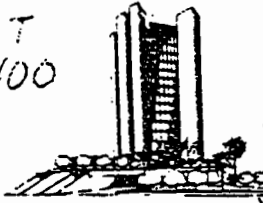
DEPARTMENT OF REGIONAL PLANNING

James E. Hartl, AICP
Director of Planning

JEH:JSM:lh



0400



L.A.C.T.C. CITY OF LONG BEACH
DEPARTMENT OF PLANNING & BUILDING

333 WEST OCEAN BLVD. • LONG BEACH, CALIFORNIA 90802

(213) 590-6651

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January 8, 1992

Brad McAllester
Manager
Congestion Management Program
Los Angeles County Transportation Commission
818 W. Seventh Street, Suite 1100
Los Angeles, CA 90017

Subject: Notice of Preparation Draft Environmental Impact Report
Los Angeles County Congestion Management Program

Dear Mr. McAllester:

Thank you for the opportunity to review the Notice of Preparation and the Initial Study. Generally, we concur with the Initial Study. We do request that the following areas of concern be addressed:

Land Use

The Program has a significant potential to cause decentralization of development due to the inability of municipalities to meet the level of service standards, and to cause an overall increase in VMT and air pollution as a result of this decentralization.

The Draft EIR should analyze the cumulative effects of this further decentralization as well as impacts upon local land use plans.

Transportation

The program has a substantial potential to cause an increase in traffic on local streets, if the regional system is metered or in any other way restricted to maintain a level of service.

The Draft EIR should evaluate the potential of traffic on local streets.

Economic

The program will potentially cause financial impacts on the cost of housing and on the cost of goods and services due to impact fees and mitigation requirements.

Brad McAllester
January 8, 1992
page 2

The Draft EIR should evaluate the impacts on the economy as well as on the adopted goals of state-mandated local Housing Elements.

The program may cause disproportionate economic impacts on cities and developers in jurisdictions which have local transportation impact fees.

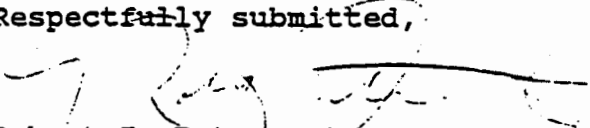
The Draft EIR should evaluate the economic effects of this impact.

Finally, the program will likely cause significant fiscal impacts on local government, if local development opportunities are frozen.

The Draft EIR should analyze the impact from both a fiscal and land use basis.

Again, we thank you for the opportunity to comment, and look forward to receiving a copy of the Draft EIR. Should you have any questions, Gerhardt H. Felgemaker (590-6894), will serve as our contact person.

Respectfully submitted,



Robert J. Paternoster
Director of Planning and Building

RJP:jm

Coalition for Rapid Transit

January 8, 1992

TO: Neil Petersen, Executive Director
Los Angeles County Transportation Commission

From: Abraham Falick, PhD, AICP, Chairman
Coalition for Rapid Transit
Former Planning Economist, City of Los Angeles

Subject: Notice of Draft EIR for the Congestion Management
Program 12/6/91

References:

Coalition Letter 10/10/90 to Community Redevelopment Agency
Coalition Letter 11/6/91 to Community Redevelopment Agency
Coalition Letter 3/15/89 to LACTC on Green Line to LAX

Dear Neil:

The Coalition believes that the proposed Draft EIR for Congestion Management provides the LACTC and the general public an opportunity to reconsider and remedy the horrendously bad routes being offered in Hollywood (Red Line) and at the Airport (Green Line).

Congestion Management loses much of its environmental purpose in these routes if the poor planning examples cited are not corrected. The two rail lines described cross regionally significant functional areas of Los Angeles County and are vital to the future environmental and economic well-being of southern California.

A. HOLLYWOOD Hollywood Freeway, Highland Avenue, Hollywood Bowl

The Santa Monica Mountains are a dominant feature of the Los Angeles Basin; they are a barrier which divides the area into two main population centers, the San Fernando Valley and the Los Angeles City Core Area (including Hollywood, Downtown and the Wilshire Corridor); each has a population of over 1½ million people. Only two freeways, Hollywood and San Diego, pierce this barrier and they are close to capacity utilization now.

The Community Redevelopment Agency is the lead bureau in this area and it has presented its Hollywood Transportation Plan to the public. This plan does not in any sense recognize the regionally significant transportation gateway/corridor function of Hollywood between the Valley and the City Core Area. The LACTC clearly participates and shares responsibility for this plan since it includes the Red Line proposals for Hollywood.

A key precept of Congestion Management is the interception of freeway traffic as far away as possible from the City Core Area. How does your plan integrate park-and-ride lots and the Red Line in order to implement this principle?

There are only 250 park-and-ride spaces projected at Universal City. MCA strongly objects to attracting more community parking, since it would compete for space with day-long parking for tourists attending their amusement center. The Hollywood Bowl now has over 3000 parking spaces available for nine months of the year (also mornings and up to 5pm in the three month Bowl season).

The Hollywood Bowl, which attracted over one million music/museum patrons and park visitors in 1991, is completely ignored as a traffic factor in your plan.

There is no longer provision for a subway stop at the Bowl, nor is any use contemplated for its huge parking lot to intercept freeway traffic. This commuter interception would not only cut the freeway load but it would also reduce through-passage in Hollywood itself. It could also relieve a desperate parking shortage in the Hollywood Central business district.

CRA is the lead agency, over LACTC, SCAG and the Los Angeles City Planning Department; where does it fit in the Congestion Management program? LACTC has simply abdicated its transportation role to a parochial and incompetent planning agency.

The CRA/LACTC Hollywood Boulevard subway line damages the redevelopment effort and loses a tax base; it wipes out most of the existing retail stores and motion picture businesses because of impaired access caused by construction activity, according to Robert Nudelman, a Director of the Hollywood Boulevard Community Council. As evidence he cites the fate of merchants on Hill Street and 7th Street downtown -- and the current retail mayhem caused by subway construction on Wilshire between Normandie and Western.

The Hollywood Boulevard subway alignment was adopted hastily by CRA/LACTC, with inadequate public discussion -- there was never a full EIR report--and evasion of federal rules for Historic Districts. Rush adoption of this line followed an appalling Sunset Boulevard elevated line proposal (also without a full EIR) that was strongly opposed by TV stations and recording studios.

The Hollywood Boulevard line proposal short-changes access to/from the cluster of high rise buildings at Sunset and Vine. It is also the most costly subway to construct because it must bull its way through the main utility corridor of the Hollywood community (sewage, power, water, telephones).

A very puzzling aspect of the Hollywood Boulevard subway alignment is its complete "stonewalling" of the original 1968 SCRTD proposal for a subway line via Selma Avenue, which was perceived as the least disruptive and least costly mode of Congestion Management to bring the subway to Hollywood. CRA/LACTC offers no discussion, analysis or explanation for the abandonment of the SCRTD route by way of Selma.

The Hollywood Bowl is a cultural treasure of summertime for the entire Los Angeles region; it is unique in the nation for the size of its "amphitheatre under the stars", 17,800 seats. It provides \$2 seats for low income music lovers and boxes for affluent ones. Improving access to the Bowl is a valid objective of urban planning.

The Los Angeles City Planning Department agreed with the SCRTD proposal for a subway on Selma and a station at the Bowl; it included this route in several of its Hollywood Community Plans in the past 20 years.

The Hollywood Boulevard subway line proposal wipes out the possibility of a Metro station at the Bowl because of the east-west alignment of the subway station at Hollywood/Highland; it makes it impossible to make the 800 foot radius railway turn toward the entrance to the Hollywood Bowl. The proposed rail line does however, have enough curve space to reach Universal City handily.

The Hollywood Boulevard alignment throttles Bowl access, does nothing for freeway traffic relief and in general sabotages Congestion Management in this major gateway/corridor through the Santa Monica Mountains and in Hollywood itself.

In May 1990 you and LACTC presented to the public an excellent joint development guideline for Metro Rail stations. Unfortunately, none of its provisions are being applied in the CRA/LACTC transportation plan for Hollywood. This is caused by the fact that both of the main stations are to be constructed in the street and have no air rights to joint develop.

The original SCRTD Selma line provided for two self-financing joint development stations in parking lots: one behind the James Doolittle Theatre at Selma/Vine and the other behind the B. Dalton Bookstore at Hollywood/Las Palmas. Since these locations would be relatively non-obstrusive and self-financing stations they would be worth about \$120 million (\$60 million each) to Los Angeles taxpayers, both lost under the Hollywood Boulevard subway proposal.

Add to the cost of the Hollywood Boulevard subway the \$48 million subsidy demanded by the developer of the proposed theater complex at Hollywood/Highland. A subsidy should not be granted to an enterprise which has the great commercial boon of a "subway in the basement."

We are curious as to why this developer was not tied into your joint development criteria so that taxpayers would benefit from the CRA assembly and acquisition of land for the benefit of this developer.

Hollywood and the Hollywood Bowl are environmental and economic concerns of the whole Los Angeles region. The mishandling of Congestion Management in the CRA/LACTC Transportation Plan should be remedied by (a) changing the proposed Hollywood Boulevard subway to the original SCRTD Selma alignment, (b) the Bowl station should be restored and (c) park-and-ride functions of the Bowl parking areas used to intercept freeway commuter traffic and to ease the parking problems of Hollywood.

B. LOS ANGELES INTERNATIONAL AIRPORT The Green Line and Ground Access

For over 20 years it has been recognized that the ground access limit (before congestion gridlock) would be about 40 million passenger landing/takeoff cycles at the airfield. The Department of Airports, much to its credit, had mitigated congestion within the grounds of LAX by double-decking its circumferential roadway to the interior airway terminals.

The Airport Department has no jurisdiction, however, over ground traffic outside of its property and basically shuns responsibility for Congestion Management in this area. It resists (for the past two decades) any measures that would reduce the number of automobiles to LAX, because about 17 percent of its total revenue come from parking lot fees. Public transportation has never been allowed closer than Parking Lot C on LAX property, but private buses, limos and taxis (who pay a franchise fee) are allowed to go directly to the airline terminals.

LAX is the largest and busiest airport on the entire Pacific Rim; it has an estimated capacity of 80 million passengers take off/landing cycles on its two major runways. The Airport is a multi-\$billion asset of the City of Los Angeles; it is equally an asset for all of southern California. Congestion Management of road and rail access outside of the airport is a crucial responsibility of LACTC -- and it has dropped the ball.

In the early 1980's there was a fierce legal battle over the construction of the I105 (Glenn Anderson) Freeway and the proposal to put a rail line in the center of the roadway. Rail proponents won, hence the Green Line. The main objective of I105 is to reduce congestion on the I405 (San Diego) Freeway and provide better access to LAX from the areas to the east of the airport, including Orange County.

To the astonishment of rail specialists around the country, the original Green Line proposed by LACTC offered an alignment that came to the southwest corner of the airport and turned south to the industrial suburbs of El Segundo and Redondo Beach, providing no station access to LAX itself!

When the public outcry became audible to LACTC it cobbled up a supplementary plan proposal called the Coastal Corridor Rapid Transit Project -- Northern Sector (LAX was not mentioned in the title although the plan concerns only LAX). The plan describes two alternatives for entry into the airport: a) a subway line from an Imperial Boulevard rail extension which would go north for 1½ miles under the airport, accessing three terminals enroute, entering the west side of Westchester and continuing to a terminal in Marina Del Rey and b) an elevated/surface route that would cross the end of one runway at grade, continue into Westchester with a stop at Parking Lot C and with a terminal in Marina Del Rey.

LACTC made the bad choice, b), strictly on the basis of cost, as explained to us in a public meeting, not on the basis of Congestion Management. Parking Lot C would cost only \$125 million vs. the subway at \$250 million. Our opposition to this choice was detailed to you in our letter of 3/15/89 (copy attached).

Rather belatedly, the Federal Aviation Agency caught you and disapproved this alignment because of the at-grade rail line at the end of the runway. The FAA pointed out that lights from the train would be a distraction to pilots landing their plane, rail car electronics, could jam radio and electronic equipment both on the ground and in the air, and power lines of a catenary-rig rail car could snag low flying aircraft coming in for a landing.

Just after the FAA spoke up the Airport Department announced its plan for enlarging the terminal facilities by expanding west to the ocean side and increasing LAX passenger capacity to 65 million takeoff/landing cycles. Their plan envisions an internal people-mover vehicle system connecting to the Green Line at Parking Lot C. The FAA objections, of course, sink this junction of the two lines.

The Coalition suggests that you restore Congestion Management via LACTC's alternative a), with a subway from Imperial that have a direct entry into three terminals. Half the cost of \$250 million should be paid by the Department of Airports; its proposed people-mover would be considerably shortened by making its junction with the Green Line at the Bradley Terminal. LAX's cost would thereby be reduced to about the same amount as its subway contribution.

But why this quibble about cost? The LACTC has just agreed, in the face of opposition from its own staff, to spend \$276 million in cost overrun on an unmanned automated train system for the Green Line ("Before This Train Leaves the Station", LA Times 12/2/91.) While it will indeed save on labor costs to have no motorman, the net gain in speed of operation is a measly one mile per hour. The automated train will, of course, not be compatible with rail cars on either the Blue Line or the Red Line.

Outside of these few objections from the Coalition, the FAA, the Los Angeles Times and your own staff, you have produced an "interesting" plan for the Green Line and LAX.

C. SUMMARY REVIEW

You and LACTC are now considering a Blue Line spur down Flower/Figueroa, at the request of USC/Exposition Park/ Coliseum. It would be part of a proposed east/west line via Exposition Boulevard that would access Culver City, West Los Angeles and Santa Monica.

Comment on the Blue Line to Long Beach may be water-over-the-dam since it is now basically complete, at a cost of over \$867 million. The original estimate was \$250-\$300 million, because of the availability of a "cheap" right-of-way from the old Pacific Electric Willowbrook Line. Since most of this happened before you arrived at LACTC, we shall fill you in on a few items.

There are Congestion Management, social and economic objections to the present line that were expressed at a public meeting in 1983, by us and others, and which plague us to this day. We all asked that this major node of culture, sport and residential activity be served by extending the Blue Line south down to the Flower/Figueroa street couple. Aside from students and sport enthusiasts, the Hoover Redevelopment area is a transit-dependant community of low income people who would benefit from the better job access that a train could have provided to both Long Beach and downtown Los Angeles. Your current consideration of a Blue Line extension to Exposition Park would partially mend the errors of 1983.

The route, which LACTC has now built, goes at grade 3½ miles east from Flower via Washington Boulevard to Long Beach Boulevard. This alignment has 18 grade crossings; the trains stop at crossing lights since automotive traffic has priority. These middle of the street tracks do not improve congestion on this heavily traveled truck route. What amazes us is the fact that the Los Angeles City Department of Transportation permitted LACTC to commit this atrocity of Congestion Management on its streets.

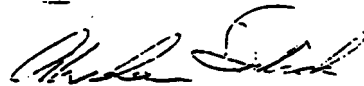
Although the Blue Line and Green Line cross each other at Imperial Boulevard, there is no track-switch provision for the Blue Line to send a future branch to LAX via the Green Line. In view of the non-compatible automated cars planned for the Green Line it may be just as well that we cannot reach the airport by way of a Blue Line car. The way to reach the Green Line now on foot at Imperial is extremely awkward, there is no escalator and the stairs are steep.

In brief, LACTC does not learn from experience. It erred badly on the Blue Line and the USC/Exposition Park/Coliseum stop and gave a repeat performance of error at LAX. Poor Hollywood, do we have to look backward 20 years hence at what you should have done about Congestion Management here too?

There is time to do something about the CRA/LACTC Congestion Management mistakes in Hollywood and the Airport. All plans are in the paper stage and concrete will not be poured for several years.

Do the right thing now. Second-guess planning cannot undo the harm that your present plan will do to Hollywood. It is an unnecessary and unwarranted Congestion Management and cultural handicap for future generations of Angelinos. We need a full EIR public hearing, including the Selma Line for discussion, and not ignoring the Federal review requirements for Historic Districts.

Respectfully yours,

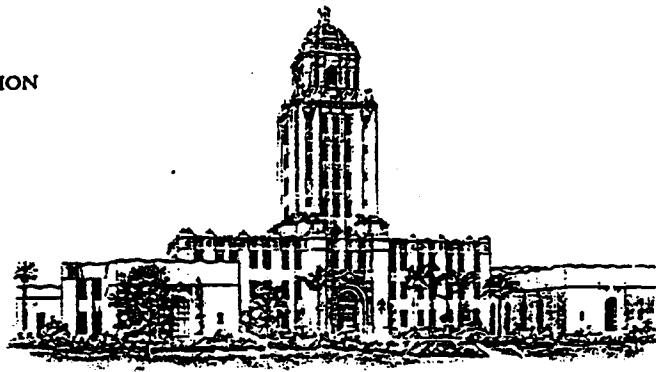


Abraham Falick, PhD, AICP
Chairman



DEPARTMENT OF TRANSPORTATION
(310) 285-2551
FAX: (310) 273-1096

455 N. Rexford Drive
Beverly Hills, CA 90210-4817



CITY OF BEVERLY HILLS

January 7, 1992

1992 JAN 13 PM 2:15
LOS ANGELES, CA

Mr. Brad McAllester, Manager
Los Angeles County Transportation Commission
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

Dear Mr. McAllester:

Thank you for the opportunity to comment on the scope and content of the Congestion Management Program (CMP) Draft Environmental Impact Report (DEIR). Your efforts to maintain open communications throughout the preparation of the CMP and to continually address divergent comments on its contents is sincerely appreciated.

As you are aware, the City of Beverly Hills has specific programmatic concerns which have been forwarded under separate cover. At this time, we have no specific comment on the DEIR's scope and content, but look forward working with you throughout the EIR process.

Sincerely,

A handwritten signature in cursive script that reads "Maria Rychlicki".

Maria Rychlicki
Acting Director

cc: Mark Scott, City Manager



OP



CITY OF MONTEREY PARK

320 west newmark avenue • monterey park, california 91754
• municipal services center



December 31, 1991

203358

1992 JAN -2 PM 12:35
L.A. O. I. O.

Mr. Brad McAllester
Management Program
818 W. Seventh Street
Suite 1100
Los Angeles, CA 90017

RECEIVED
JAN 2 1992

SUBJECT: Congestion Management Program - Notice of Preparation of Draft EIR

Dear Mr. McAllester:

After reviewing the documents on subject Congestion Management Program received by the City on December 16, 1991, I have the following suggestions to offer:

On the plan entitled "CMP Routes for Further Study", which is located between pages 18 and 19 of the Final Draft of the Congestion Management Program, Garvey Ave. should be extended westerly from Atlantic Blvd. to its connection with Ramona Blvd., and Ramona Blvd. should then also be included in the Program from its Garvey Avenue intersection westerly to Eastern Ave.

The reason for including these additional streets is because whenever there is a traffic "tie-up" on the eastbound lanes of the 10 Freeway between Eastern Ave. and Rosemead Blvd., traffic exits the Freeway at Eastern Ave. and proceeds easterly on Ramona Blvd. and Garvey Ave. and gets back on the Freeway at Rosemead Blvd.

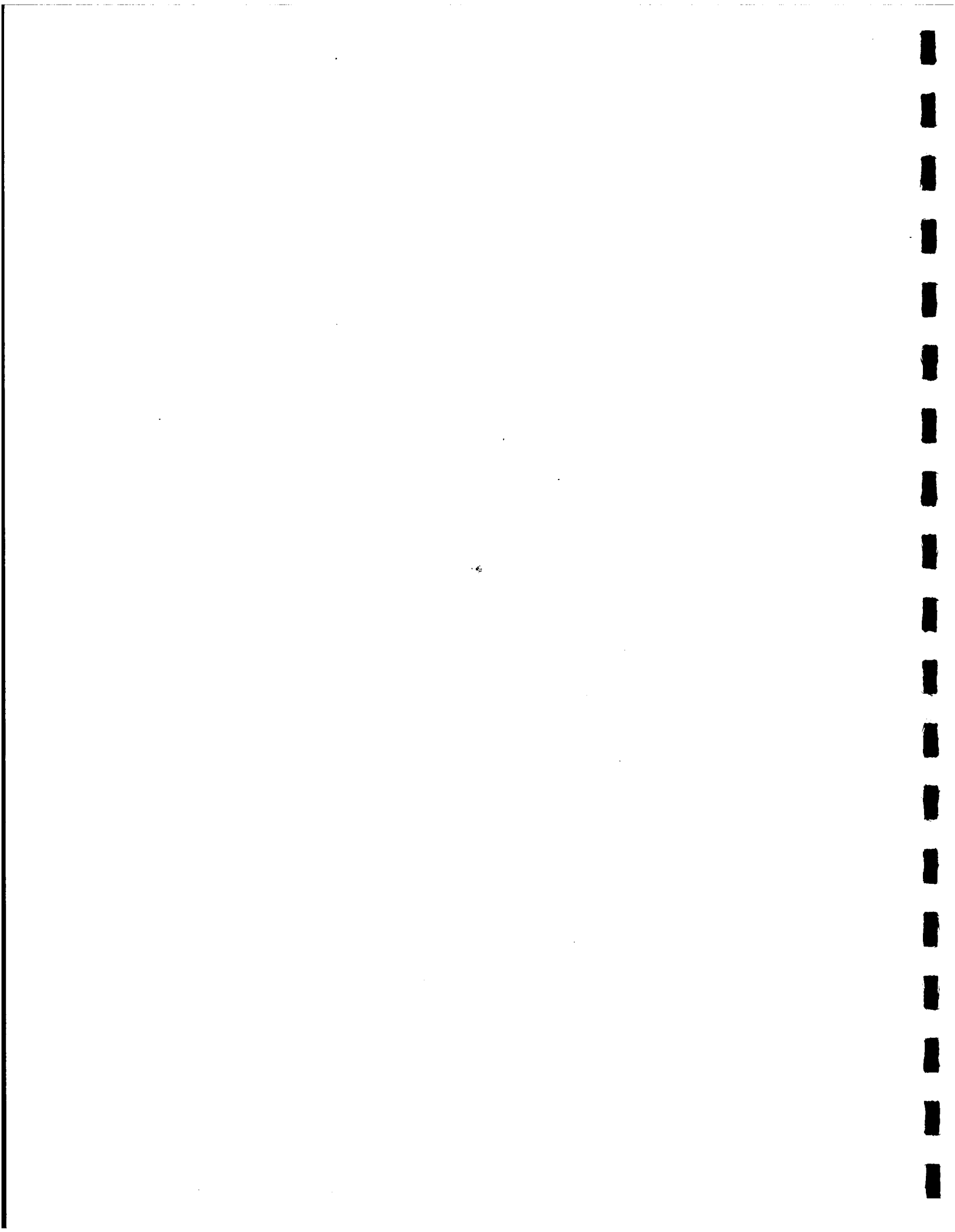
Using the same rationale as stated above, Garvey Ave. from Rosemead Blvd. easterly to its intersection with the 10 Freeway just west of the 605 Freeway interchange should also be included on the Map entitled "CMP Routes for Further Study."

Thank you for considering my suggestions.

Very Truly Yours,

John Lathrup
John Lathrup
City Engineer

JL/mju



D142
10P

L.A.C.T.C.
1992 JAN 15 AM 10 26

THE CITY OF POMONA

ROBERT A. DeLOACH
Director

204479

Public Works Department

December 13, 1992



Mr. Brad McAllester
Congestion Management Program, LACTC
818 West Seventh Street
Los Angeles, CA 90017

Dear Mr. McAllester:

The Notice of Preparation for the Congestion Management Program has been reviewed by the Pomona City Planner. While it was difficult to assess specific impacts of such a broad program EIR, the following comments have been provided for your consideration:

1. We are concerned about the effect the CMP will have on present and planned land use in the City and whether it will be consistent with the Pomona General Plan.
2. It is stated on Page 17 of the Notice of Preparation that Transportation Demand Management (TDM) measures could potentially alter the demand for parking facilities. Many areas of the City, especially the older downtown area, lack adequate off-street parking to serve land uses. Adoption of the TDM measures could exacerbate this situation.
3. We are concerned about the effects on aesthetics that would result from construction of specific projects, such as transit facilities. We look forward to reviewing the discussion of these potential impacts in the EIR.

If you have any questions, please feel free to contact me at (714) 620-2261.

Sincerely,

Artie A. Fields
Senior Management Analyst

AAF/mp58



Coalition for Rapid Transit

November 6, 1991

TO: Edward J. Avila, Administrator
Community Redevelopment Agency of the City of Los Angeles

From: Abraham J. Falick, PhD, Chairman
Coalition for Rapid Transit
Former Planning Economist, City of Los Angeles

Subject: Hollywood Transportation Plan (Revised 11/6/91)

The Coalition for Rapid Transit believes that the CRA Memorandum on the Draft Hollywood Transportation Plan of September 1990 is not responsive to the concerns expressed in our letter of October 10, 1990 regarding the proposed Hollywood Boulevard subway alignment and the Highland Avenue Hollywood Bowl subway alignment.

HOLLYWOOD BOULEVARD SUBWAY ALIGNMENT

The Los Angeles Times in a recent article "Officials Seek Less Disruptive Way to build Red Line" (10/8/91) summarizes the merchant upheaval problem very well.

"Stung by complaints about torn-up streets during subway construction downtown ... (LACTC) said Monday they are considering alternative station construction to avoid hard feelings -- and lawsuits -- as Metro Red Line is tunneled under Hollywood."

Your staff deserves credit for pausing and considering the cries of anguish and distress from Hollywood merchants who face ruin by implementation of the current plan.

Unfortunately, the construction techniques under review are much more complex, and much more expensive, than cut-and-cover. The utility displacement problem in Hollywood Boulevard already makes it one of the most costly subway lines in the City of Los Angeles because the boulevard is the "main drain" of the Hollywood community, with water, sewage, power and telephone lines concentrated here.

Torn-up streets and impaired access there will be. The merchants and motion picture theater owners look at 7th Street between Olive and Grand (south) and then see themselves in Beirut, with abandoned buildings, boarded up stores (minus shellholes). This was the result of impaired access imposed by Metro Rail construction over a period of two years. Much of this construction work was done at night or on weekends -- the busiest times of all for Hollywood Boulevard.

The merchants also see the same process at work right now on Wilshire Boulevard at Western Avenue: pavement diggers, skip-loaders, cement trucks, also piles of materials and equipment on adjacent side

Coalition for Rapid Transit

streets all add up to impaired access and reduced business volume. This spells absolute ruin for Hollywood merchants and they will fight you to death in the courts; they do not have much choice, Incidentally, the merchants have also found evidence that federal Historic Conservancy impact (EIR) public hearings were evaded by LACTC in the case of historic structures on the boulevard; this is another possible court suit.

Just how did the Sunset Boulevard and Hollywood Boulevard Metro plans get on the books? LACTC surely did not have adequate public hearings for their EIR on Sunset, hence the threatened suits by TV studios and recording studios. The Hollywood Boulevard route just as surely had inadequate public hearings; it was hastily prepared, had no SCRTD precedent plan and was sprung on the public one month after the misbegotten Sunset plan was abandoned. An investigative reporter should have fun with this one.

Continuation of the Hollywood Boulevard line proposal will lead to costly suits and delays. Why continue this hemorrhaging when the original SCRTD plan on Selma Avenue, was found to be the least disruptive, least costly line through Hollywood? It is a route that serves the Sunset/Vine high rise buildings as well.

The Selma Avenue alignment is not an off-the-wall proposal; it was a logical, carefully researched and long-held position of the Southern California Rapid Transit District, originally in its 1968 Metro Plan. The Los Angeles City Planning Department agreed with SCRTD and incorporated it in various Hollywood Community Plans over the past 20 years.

The mystery is why the LACTC ignored these plans and precedents. Part of the story may lie in the team of east coast planners brought in by John Dyer, former General Manager of SCRTD. Part of the story may be in the continuing pressure of opposition from Universal City (MCA), which has a long record of resistance to a station at the Hollywood Bowl for competitive reasons.

The CRA and LACTC must surely know from its public experiences that we are facing a commercial area disaster on Hollywood Boulevard. "Alternative construction techniques" are more costly and not likely to be affective since on-site or nearby construction is still required.

Stone-walling the public with sanctimonious statements that "the present line has been approved and funded by the federal government" will not do. This is simply bureaucratic dust-in-the-eyes. When the

Coalition for Rapid Transit

LACTC bureaucracy wants a change, such as on the Wilshire line, it does not bother them at all to ask the feds for a change from Wilshire/Western to Pico/San Vicente instead of the original plan to go to Fairfax via Wilshire.

In truth, the feds could care less as long as the local officials are satisfied and the change does not cost more. Selma will cost less and also provide the joint development sites (parking lots) that Hollywood Boulevard cannot offer. The Memorandum response to our Selma suggestion (p28) is just ludicrous; it is empty rhetoric without analysis or explanation as to why the original SCRTD plan was abandoned.

With respect to joint development and self-financing of subway stations (wholly or in part) both CRA and LACTC committed themselves, in a 1987 brochure, to actively pursue joint development as a measure to defray construction costs and provide better commercial facilities. The present plan offers not a single joint development site in one of the most important commercial areas of the city.

The Memorandum very kindly agrees with our recommendation for joint development -- but where have the CRA/LACTC planners been all these years? Did they really need to be reminded by us if this was a serious commitment by both agencies in the first place? We are not talking about peanuts here; each station so developed can save up to \$60 million.

HIGHLAND AVENUE/HOLLYWOOD BOWL

We are amazed by the Memorandum's non-response to the serious problem of rising traffic totals on Highland from both the Hollywood Freeway and the Hollywood Bowl. Highland remains a seven lane highway, but the reversal lane is extended to Santa Monica Boulevard. That is all. (p8).

We should be grateful for the fact the Memorandum (p25) mentions the fateful words "Hollywood Bowl" for the first time in the Hollywood Transportation Plan. It is in response to our proposal for a Bowl station and use of its 4000 car-space parking lots as a park-and-ride facility for both transit riders and tourists. The original CRA plan totally ignores the Bowl and its 900,000 patrons. Can anyone realistically talk about Hollywood and not notice its great summertime attraction?

The Bowl site is not even indicated on the plan's area map because it is "outside of the plan area". Outside it may be decreed, but the impact of the traffic is well within the plan area. To ignore the Bowl is plain bureaucratic idiocy.

Coalition for Rapid Transit

In the Memorandum discussion of parking there is a good analysis and explanation of the growing shortage of parking space in the Hollywood community. There is an estimated "3740 space shortage by the year 2010 if present land use trends continue" (p30). When they get to the Hollywood Bowl park-and-ride lots CRA planners "go ape" as they try to discredit their value: "infeasible for several reasons" (p25).

"Access to these facilities by the Hollywood Freeway from the San Fernando Valley would not be an effective tool since the most congested part of the trip 'over the hill' would have to be endured regardless..."

So why are we worried? No one will use it. Universal City offers a piddling 250 spaces for commuter park-and-ride purposes at its Metro station; there is clearly a shortage of such park-and-ride parking on the Valley side. If commuters can't find space on the Valley side a few might be attracted to the Bowl. How about the Hollywood work force? How about tourists? All three of these groups could reduce the auto traffic on Hollywood streets by using the Metro trains either for the downtown commute or as a shuttle into the Hollywood central business district.

"Access from other regions would have to use the Hollywood streets, particularly Highland Avenue, to reach the Hollywood Bowl, which would add to traffic and congestion in the Hollywood core."

"Other region" travelers would have the advantage of light contra-stream traffic going north on Highland since most freeway traffic in the morning is southbound; this is reversed in the afternoon. Where were those "other" Bowl parkers before they were attracted there -- going through Hollywood! See p36 for the Memorandum's curious analysis of "Through Trip Mitigation"; CRA staff cannot agree with its own consultants.

"Difficulty in guaranteeing that Hollywood Bowl lots would be cleared in time for Bowl event parking."

The memorandum spends many pages on describing its own plans in Hollywood to restrict parking and is suddenly struck dumb by such a thought at the Bowl. I shall tell you how it is done in the three months of Bowl action. Put up a neat sign that says "Out by 5 or be ticketed and towed." The Bowl has thoughtfully provided a tow lot alongside its offices on the eastside of the freeway at 2630 N. Cahuenga East.

"Lots are only available at certain times during the year and for varied times of the day."

Coalition for Rapid Transit

In brief, the Hollywood Transportation Plan makes no use of the Hollywood Bowl Metro station to reduce freeway and Bowl traffic on Highland, or of its park-and-ride facility to mitigate the parking problem in the central business district of Hollywood.

As a bureaucrat at City Hall for eight years, I realize how difficult it is to admit a mistake publicly and to backup and remedy an incorrect decision. It takes courage to do so. If you go ahead as presently planned on Hollywood Boulevard both the public and your careers will suffer needlessly. The merchants have made their case and you know they are correct. Make use of the original SCRTD Selma plan and do the job right.

CC: Hollywood Community Advisory Council
Hollywood Econ. Development & Transportation Commission
Department of City Planning
Hollywood Planning and Design Review Commission



Coalition for Rapid Transit

October 10, 1990

TO: The Community Redevelopment Agency, City of Los Angeles
Mayor Tom Bradley, City of Los Angeles
Board of Directors, Southern California Rapid Transit
District
Roland Mross, Urban Mass Transportation Administration

FROM: Abraham Falick, PhD, AICP, Chairman
Coalition for Rapid Transit
Former Planning Economist, City of Los Angeles

Subject: Final Hollywood Transportation Plan (Revised), Sept. 1990

References: UMTA Letter to Coalition 10/30/89 (attached)
Coalition letter to SCRTD 2/2/88 (attached)

The Hollywood Transportation Plan has a number of glaring deficiencies that can and should be corrected at this "paper plan" stage, long before we see the concrete poured that will lock us in to a hopelessly inadequate plan for Hollywood over the next 25-50 years.

Most curious anomalies are the treatment of Highland Avenue and Hollywood Boulevard. Incredibly, no mention is made of the Hollywood Bowl which attracts over 750,000 patrons in its three month performance season! The Plan turns a blind eye to joint development of rapid transit stations which has been urged by the federal Urban Mass Transportation Administration for at least 12 years.

THE HIGHLAND AVENUE CORRIDOR AND THE HOLLYWOOD BOWL.

Highland Avenue has the major south offramp from the Hollywood Freeway into the Hollywood community; it is also a great corridor-distributor into the mid-Wilshire and west Los Angeles areas. At the foot of this south-bound offramp lies the entrance to the Hollywood Bowl. During the Bowl season Highland Avenue is one of the most heavily congested streets in southern California. Not worth mentioning? A glance at Exhibit 3-1 (Recommended Highway Improvements) does not even show the Bowl location!

"After an extensive set of testing north-south alternatives, Highland Avenue was selected as the corridor that 1) best accommodated north-south traffic and traffic destined for Hollywood... Extending the reversible lanes, thereby retaining parkways and sidewalks.." (page 3-4)

What can we make of this? Obviously no radical transformation of Highland Avenue is contemplated to accommodate the rising tide of traffic from the freeway and the increasing Bowl attendees.

Beginning with the 1968 SCRTD rapid transit plan a subway station at the Bowl has long been included as an absolutely essential part of congestion relief for Highland Avenue. Metro Rail subway trains can carry 30,000-40,000 passengers per hour, effectively blunting the commuter congestion peaks and easing Bowl performance traffic on summer evenings.

In 1983 SCRTD included a Bowl station in its new plan but insisted it should be built at a later date by retrofit. In the meantime, its plan would build the footings for the station; it appropriated funds for design of the station. The station has indeed been designed by the distinguished Architect Frank O. Gehry. He informs us that he is ready to go ahead with working drawings as soon as he gets the authorization.

Incidentally, Richard Gallagher, retired SCRTD Metro Rail Manager/Chief Engineer tells me that the Bowl subway station would be one of the cheapest stations to build because it is entirely on County land, requires neither building demolition nor residential relocation and utility line displacement is minimal.

The Music Corporation of America (owner of Universal City) has made no secret of its opposition to a subway station at the Bowl. This is apparently because the Bowl (17,800 capacity) is a competitor to its own Universal Amphitheater (6,500 capacity) for a few jazz/rock concerts during the summer.

The present Hollywood Transportation Plan offers a subway route far to the west of the Hollywood Bowl, ostensibly because the rail line could not be curved to reach the Bowl from the east-west alignment of the planned station at Hollywood/Highland. How did this happen? Most assuredly, it was no accident of planning.

This new proposed subway line through the Santa Monica Mountains somehow misses the Hollywood Bowl but does manage to reach Universal City. The latter station would not be paid for in any way by MCA, although it will require substantial demolition of structures and relocation of residents. No one at SCRTD has suggested a Benefit Assessment District or joint development project to provide value-recapture for the public.

The Universal City station will, of course, enormously improve public access to this commercial property. Only 250 parking spaces are allocated for community park-and-ride Metro Rail use on the SCRTD site plan, but a marginal notation on the map states that 2500 spaces will be available elsewhere. (location not specified).

We should mention that park-and-ride space is very scarce on both sides of Cahuenga Pass. The Hollywood Bowl has 4,000 parking spaces that are wholly vacant for nine months of the year and partially vacant (to 5pm) for three months. Hollywood too has a severe shortage of parking space; the Bowl parking lots and an adjacent subway stop would be a great asset for the community. Visitors, residents and office workers could park at the Bowl and use the Metro as a shuttle to the two main stations in the central business district of Hollywood -- or continue into downtown Los Angeles.

How can the Hollywood Transportation Plan seriously offer to alleviate the steady growth of congestion in Hollywood when it ignores a role for the Metro Rail subway on Highland and at the Hollywood Bowl?

HOLLYWOOD BOULEVARD vs. SELMA AVENUE SUBWAY ROUTE

The present SCRTD subway plan calls for an east-west line under the Hollywood Boulevard with in-street stations at Hollywood Blvd./Vine and Hollywood/Highland in the central business district.

In the 1968 SCRTD rapid transit plan and in almost all LA City Planning Hollywood Community plans Selma Avenue has been designated as the rail alignment because it would be the least disruptive route through the Central business district. A Selma/Vine station provides one block access to both the high rise buildings at Sunset/Vine and the theater/retail complex at Hollywood/Vine.

Going west the Selma line plan offers a broad curve in subway from Selma to a station in the parking lot area north of Hollywood Boulevard at Las Palmas. From there the line proceeds about a mile (4800 feet) to the Hollywood Bowl station, thence through Cahuenga Pass to Universal City and North Hollywood. Many drawers of plans for the 22 year old route exist at SCRTD.

"The physical impacts from the construction of Metro Subway Rail subway system under Hollywood Boulevard will be significant in the 1990's. These impacts will include reduced pedestrian and vehicular access, reduced on-street parking and disturbances from noise and dust and potential impact to historic buildings. The greatest impact will be caused by sections requiring 'cut and cover' construction at each station site' (p6-8).

The present Hollywood Boulevard subway has all the construction fleas that caused it to be rejected as a route in earlier years: blockage of retail businesses, massive disruption of traffic, huge utility relocations, poor service for Sunset Boulevard businesses.

Actually, the Hollywood Boulevard route in its modern version was a hastily engineered line, done in a one month^{or two} after strong opposition was registered to its elevated line proposal on Sunset by the TV stations and recording stations. The threat of a lawsuit caused SCRTD to somersault.

One has only to view the subway construction and utility relocation activity on Hill Street and 7th Street in downtown Los Angeles to realize what can happen to Hollywood over a three to four year period from the start of construction of a Hollywood Boulevard subway line. Is such street upheaval a contribution to redevelopment of Hollywood? Ask the downtown retailers for their opinion.

"As part of the Draft Hollywood Bowl and District Urban Design Plan, allow for a potential four foot widening of sidewalks recommended along Hollywood Boulevard from La Brea Avenue to Argyle Avenue. This sidewalk widening would decrease travel capacity for this section of Hollywood Boulevard" (page 3-10)

Aside from the 3-4 year construction street-mayhem on Hollywood Boulevard, the completed in-street stations on the new plan will create more congestion because of passenger drop-off vehicular traffic as well as more station-bound pedestrians. Using the original plan, stations at Selma/Vine and the off-Hollywood station at Las Palmas, there would be a considerable reduction of station-bound traffic on Hollywood Boulevard itself.

In brief, the Hollywood Boulevard subway line would inflict great harm on retail business and theaters, provide poor access to Sunset Boulevard high rise office buildings and handicap access to the Hollywood Bowl.

JOINT DEVELOPMENT AND UMTA

The federal government, via the Urban Mass Transportation Administration, provides about half of the money needed for construction of the Metro Rail subway. For the past 12 years or more UMTA has strongly urged rapid transit systems, via letters, incentives, seminars and personal visits, to supplement their half of the cost by joint development with real estate developers of air rights above and adjacent to the subway stations.

UMTA points out (in the attached letter) that up to 20 percent of total rail/station construction cost has been recaptured by this method in other rapid transit systems, Los Angeles has its own example of air rights usage in Pacific Electric's 12 story 1927 Subway Terminal Building on Hill Street downtown.

The Hollywood Boulevard subway plan is a non-starter on joint development because there are no air rights available for the two in-street stations proposed. The public pays for such stations "cold turkey".

The original Selma Avenue alignment, however, is a very different story. At the Selma/Vine station large parking lots behind the James Doolittle theatre provide ample space for a 15-20 story structure that could serve a hotel, office building, shopping center, parking structure and bus depot. Selma itself is not a heavily travelled street; it is lined by parking lots and a rather nondescript collection of commercial structures. There is virtually no residential relocation or historic building problem.

A similar story presents itself on the Selma route of the off-Hollywood/Las Palmas station in present parking lot sites. A hotel, shopping center, parking structure is appropriate here as well. It is likely that the value added by joint development of air rights at both of these locations would make the subway stations self-financing -- a saving of \$60 million for each station.

It should be noted that the Hollywood Transportation Plan does offer a joint development site at Selma/Vine in exactly the location we have described, for a 4-level parking structure! (page 7-12). Such imagination staggers the mind.

Parking is a major concern of the Plan, and rightly so. But what missed opportunities there are by not linking the Hollywood Bowl parking lots to the two "Selma Route" stations in the central business districts of Hollywood. Joint development is mentioned only in connection with a few parking structures.

SUMMARY COMMENT

The Hollywood Transportation Plan is a very bad proposal, mainly because of its hopelessly inadequate treatment of the Highland Avenue/Hollywood Bowl corridor, acceptance of the disastrous Hollywood Boulevard subway alignment and the complete lack of significant joint development planning.

None of these comments should be construed as a reflection upon Barton-Aschman Associates who have done a competent professional job within what we believe are misguided parameters of both CRA and SCRTD.



Coalition for Rapid Transit

March 15, 1989

Neil Peterson, General Manager
Los Angeles County Transportation Commission
403 West Eighth Street
Los Angeles, California 90014

Dear Mr. Peterson:

It is with regret that the Coalition must tell you that it believes that the Draft EIR of the Coastal Corridor Rapid Transit Project - Northern Sector describes a rail route that would be a public disaster and a complete waste of our taxpayers money. The rest of this letter tells you why we think so.

Why is the project being built? What is the strategy behind this effort? The closest the EIR comes to explaining this plan is in its description of the three alternative actions considered. The authors of the EIR state that this project will relieve local and regional traffic congestion, improve access to employment centers and (incidentally) to LAX. We believe this is not so.

Why is the chosen rail alternative directed around, but not into LAX? Chicago and Philadelphia subways enter their airports directly. Are we not bright enough to achieve this? Is the Marina del Rey area a transit-dependent neighborhood? Are the residents a major source of industrial employees and airport traffic? Will a rail storage yard be welcome in the Marina area? The EIR concedes that the elevated structure will "include reduction of roadway capacity and increase traffic at or near stations." (p 2-3). This is going to decrease congestion in the Westchester community?

The Grand Strategy of LAX Access: North, East and West

There is a great rationale, or strategy, for improving access and reducing congestion at Los Angeles International Airport. The name of the game is to save our airport from an impending gridlock of auto traffic. Easing the burden of traffic in Westchester is a secondary objective - which would be served by an effective solution to the the first objective.

LAX is the largest airport in the Pacific Rim, it is a vital economic center of the whole Los Angeles region. The runways of the airport have a capacity of 80 million passenger takeoff/landings per year. For several decades we have known that the problem at our airfield is the ground access, numbers now limited to about 40 million takeoff/landing cycles per year because of road network capacity leading into LAX. We have frequent grid-lock situations, even now on weekends and holidays.

If we can increase the ground access passenger numbers by 50-60 percent over the next 3-4 years, we can extend the economic and functional life of our airport by 30-40 years. Building another airport (Palmdale, in San Pedro Bay, Orange County, etc.) would be a multi-billion dollar project and take a decade to build - but this too may be necessary eventually. Our strategy must be to buy time with an effective underground approach to expand our ground access numbers.

The only course that makes sense is to open three corridors into LAX, from the north, east and south. Unfortunately, the route alignment proposed in this EIR is not only ineffective but it is counter productive. It sinks money into a bad plan and delays implementation of a proper alignment.

We look at the north route of the Coastal Corridor as roughly paralleling the San Diego Freeway. The east route is the Glen Anderson Freeway (I 105) and its rail line in the central median. The south route is less heavily traveled, but the planned light rail extension from the Glen Anderson Freeway to El Segundo/Redondo Beach could have some benefits.

The Department of Airports, much to its credit, has spent over \$700 million in the past few years to improve passenger access via internal traffic circulation, including double-decking of its Circumferential roadway. LAX does not have the authority to improve external access to the airport; that responsibility is in the lap of LACTC. You are the coordinating agency among CALTRANS, the City of Los Angeles Planning Department, SCAG, SCRT, the LA Dept. of Airports and SCRTD assorted other federal, state and local agencies. It is the failure of LACTC to achieve this coordination, especially with the Dept. of Airports that has led to this disastrous plan proposal.

In its Initial Alternative Evaluation Report (1988) LACTC examined three possibilities regarding airport access: No project, LA Terminal Station and an Airport Road Alignment; it chose the last named, provides us with the full EIR treatment. We should like to examine this bad choice in somewhat more detail.

The Airport Road Alignment Alternative

This line swings north from the Glen Anderson rail line in elevated structure at Aviation Blvd., descends to an at-grade level at the east end of the LAX runways, rises to elevated and enters Century Blvd. It makes a sharp left turn (300' radius) onto Century and continues in elevated to Avion St. The elevated line makes another sharp turn north to 96th St. thence to Parking Lot C of LAX.

From Parking Lot C, the line continues in elevated structure north on Sepulveda, thence to the proposed Westchester Parkway. A turn is made northwest into Lincoln Blvd., with a short segment of subway from Manchester Station to Manchester Bluffs. The elevated line continues over Ballona Creek, continues north along Culver Blvd. The end of the

line here is rather vague, but would apparently require a train storage yard in a residential district.

It should be noted that the sharp curves (300') preclude future use of high speed Metro Rail trains, as their cars require 600'-1000' radius turn curves. One of the great virtues of the Glen Anderson rail line is its straight route over 20 miles to the door of LAX. We do not make access to the airport easier in this Airport Road Alignment by requiring air passengers to take themselves and baggage off the train and transfer to a shuttle bus into the terminal at Parking Lot C. All the elevated structures on Aviation, Century, Westchester and Lincoln will add to congestion around the airport, not reduce it.

This is a "cheap" alignment, but there is a price to be paid in the future.

The LAX Terminal Alternative

This rejected alternative would have provided direct subway service to two airport satellites (moving sidewalks underground ~~at~~ Chicago were not mentioned). The line would proceed west from the Glen Anderson rail line in elevated structure along Imperial Blvd. It would turn north in a 1½ mile subway under LAX, portal at Lincoln Blvd. to elevated structure (or continue directly into subway segment) and follow the route described in the Airport Road Alignment into Marina del Rey.

LACTC staff claims that the subway at LAX terminal station would cost \$250 million, indicates that this is sufficient reason to rule out the subway alternative. Considering the fact that LAX is a multi-billion dollar installation, one that is of overwhelming importance for the economy of southern California, we think your staff is looking at the wrong end of the telescope.

If there were no airport in this area there would be little or no congestion to worry about. Since LAX does attract all those millions of people and their hundreds of thousands of automobiles, the Coalition feels that the Los Angeles Dept. of Airports has some responsibility for mitigating their ground approach traffic impacts by picking up half the tab for a subway/rail station within its boundaries (\$125 million).

Opposition to a perfectly logical subway approach to LAX comes without question, from the Airport administration, which for years has resisted all attempts to let public transportation enter its turf. Hertz Rent-A-Car and Marriott Hotel buses, limousines and other franchise-paying vehicles have unhindered access to all of the airline terminals. SCRTD buses may approach no closer than Parking Lot C, endure the passenger/baggage shift to LAX shuttle buses.

The Department of Airports obtains about 17 percent of all its revenues from parking lots and structures. It has been fiercely protective of these parking revenues and has absolutely no incentive for reducing the number of automobiles coming to LAX. It obviously

fears a subway as having some ability to stall its steady growth in satellite parking areas and structures.

This department is a part of the City of Los Angeles administrative operations; it is up to the Mayor (who appoints the Commissioners), the City Council and LACTC to bring it in line with the larger economic and transportation objectives of the region by requiring it to cooperate on the matter of subway construction through the airport.

The Coalition Alternative: Subway and North Corridor/Freeway-Intercept

To protect one of the great economic assets owned by the people of Los Angeles, we need to think and plan in terms of a 50-100 year perspective. The "cheap" and expedient plan chosen by LACTC would have to be regrooved in 5-10 years of operation because of its inadequacy. Let us do this right the first time.

Subway access takes traffic off surface streets and encourages rail use because of its greater speed and convenience for airline passengers. The airport is our first concern, not Marina del Rey or Westchester. Both of the latter are entitled to a well-planned station in their own terrain; they could be Joint Development/Self-Financing stations of high quality.

The route north from the LAX subway should go through both communities, as a first stage, turn northeast on Culver Blvd. to a train storage yard adjacent to the San Diego Freeway. This should provide a freeway station intercept parking structure in the air rights over the train storage yard. A large parking site (3000-4000 cars) would be attractive to motorists since they could park at a fair distance from LAX, yet have direct entry into the terminal via subway. The parking fees alone would make this station self-financing; it could be a Joint Development as well.

At a second stage of construction the train could go in subway straight-north to Century City (with a possible future junction here with the Wilshire line from downtown LA). It would then take a turn west to Westwood/UCLA. The third stage would be a seven mile tunnel through the Santa Monica Mountains to Van Nuys and the San Fernando Valley. These two stages roughly parallel the San Diego Freeway and could offer substantial congestion relief in this heavily traveled Coastal Corridor.

This is the Grand Strategy northern approach to a LAX rescue plan, in place of the LACTC proposal for the Northern Segment. Probably of equal importance is the eastern approach via the Glen Anderson Freeway.



City of South Gate

8650 CALIFORNIA AVE., SOUTH GATE, CALIFORNIA 90280 • (213) 563-9537

FAX'd 6/10/91

FROM THE OFFICE OF
JAMES A. BIERY, P.E.
DIRECTOR OF PUBLIC WORKS
CITY ENGINEER

June 10, 1991

Mr. Brad McAllester -
CMP Program Manager
Los Angeles County Transportation Commission
818 West Seventh Street
Los Angeles, CA 90017

RE: Congestion Management Program for Los Angeles County,
Discussion Draft Dated May 15, 1991

Dear Mr. McAllester:

The City of South Gate hereby submits the following written comments to the Draft CMP, as prepared by LACTC.

- Page 11. The Draft CMP states that once a route is listed as part of the CMP network that it will never be removed. However, on page 11, Section 3.2.2 it states that "The Century Freeway will replace Firestone Blvd. upon completion. (Firestone Blvd. is proposed to be rescinded from the State highway system)". The paragraph above this quote states Firestone Blvd. is an "alternate arterial route" and only included until the routes under construction (Century Freeway) is completed and the CMP designation will shift to this new alignment. Does this mean the City should not bother to study Firestone Blvd. as part of the CMP network since it may be removed as part of the network when the Century Freeway is completed in a few years? This removal will take place during the time frame of the seven year CIP LACTC is asking the local cities to prepare.
- Page 46. There appears to be typographical error on Page 46 under the paragraph entitled - Flexible congestion Relief (FCR). In the last sentence the reference to \$3 million should probable be \$3 billion.
- Page 9, Figure 3-1. The level-of-service descriptions appear to be directed at freeways. Arterial and intersection descriptions should be provided.
- Page 20. The intersection level-of-service methodology is specified as the Intersection Capacity Utilization (ICU) methodology during the first year and then switching to the planning methodology of the Highway Capacity Manual (HCM) for subsequent years. This appears to unnecessarily require re-education

of many decision makers and others in a year. Also, if a project analysis starts with the ICU method and is delayed then the analysis may have to be reworked. It also seems that if we recognize the second year method as the one to work toward, that we should use it initially. In addition, the HMC method essentially superceded the interim ICU method approximately 6 years ago. As a minimum, it is suggested that jurisdictions be allowed to start with the HCM method in the first year if desired, and that the operational method also be allowed as an option.

- Page 26. It is assumed that transit operators not meeting the routing and frequency standards will not be required to submit annual reports. Also, will transit routes which do not meet the standards be allowed as part of deficiency plans? What funding, if any, may not be available to operators not meeting the minimum service levels? It is assumed that if contributions for any component of the transportation system (roadways, transit, demand management, etc.) will improve deficient conditions, then they may be included in deficiency plans. TRANSIT
- Page 31+. TDM requirements for new developments are based on square footage of facilities. This should be clarified since it may be interpreted in many ways (e.g., as building square feet or lot square feet). Also, the size does not account for differences in type of land use. For example, 100,000 square feet of warehouse, office, and retail have significantly different overall traffic demands and employment. Some measures may also be very detrimental as stated. For example, a retail land use may find difficulty in designating spaces "as close to building entrances as possible" for carpool/vanpool use. A warehouse may be over 100,000 square feet with relatively few employees, but would be required to provide an Employee Transportation Coordinator and locker and shower facilities for men and women. It is recommended that LACTC consider threshold as established by Orange County Transportation Commission. TDM
- Page 34. It may be beneficial to allow the optional TDM ordinance provisions as substitutes for other measures, or to provide a single list of measures and require selection of a certain number for implementation. TDM
- Page 36. The section on Violation of Ordinance states that "a schedule of fines shall be developed by LACTC and applied by each City." It is suggested that minimum fines or a range of fines be identified so that cities may have more flexibility.
- Pages 38 and 39, and Chapter 7 (Deficiency Plans/Countywide Mitigation Fees). A major concern for the City of South Gate is the use of countywide or subregional impact fees. Any expenditure of South Gate related fees in other areas of the county would have to be carefully and well justified. Our City Attorney shares this concern. It is believed that the countywide impact fee was to be used to mitigate impacts of development which cross jurisdictional boundaries and a clear nexus (referenced on page 44) would be maintained. It may be comforting to the various jurisdictions if this is clearly stated in the CMP.

June 10, 1991

Page 3

- Page 38. The transportation impact analysis program indicates that it is applicable to "all" new development. Such an all encompassing requirement appears to cover even small additions to a single family residence. It is suggested that threshold levels for analyses be developed based on land use, size, employment, and/or trip generation. Perhaps several threshold levels may be developed, with increasing analysis requirements as potential impacts increase. Again, it is recommended that LACTC consider threshold, as established by Orange County Transportation Commission for TDM.
- Chapter 7. The discussion on deficiency plans does not appear to address some key concerns related to application of fees collected.
 - 1) If the deficient element is eligible for funds other than those collected through impact fees, what proportion of funding will be provided by the impact fees? For example, if a freeway under Caltrans jurisdiction requires widening, how much of the widening costs will be paid through state, federal, or other fund sources vs. impact fees, and how will equity be maintained among jurisdictions. It appears possible that one City may have to pay a high proportion of costs while another City may pay a low proportion.
 - 2) If an element of the transportation system is not currently deficient but may be in need of improvement in the future due to cumulative development, may the collected fees be applied to the future improvement of the transportation element. If countywide or other fees are collected for deficiencies and spent elsewhere, collection of fees for local improvements may not even begin until the deficiency results.
- Page 44. The second bullet indicates a potential impact fee based on a per square foot or per trip basis. It is assumed that land use will be considered.
- The CMP does not appear to provide any credit or consideration to impacts of improving the jobs/housing balance in a city or area. Since this may assist in mitigating deficiencies and/or reducing impacts (and is a concern identified in the Regional Mobility Plan) it is suggested that some form of credit or incentive be included in the CMP for improvements in the balance.
- Chapter 8. The capital improvement program raises an important concern regarding timing of improvements relative to impacts (concurrency). In short, it appears that contributions toward mitigation measures (whether very direct to the development or part of the deficiency plan) may be of little benefit until long after impacts of the development results. Mitigation may require a developer to contribute to a state, county, or local project which may not receive sufficient other funding until many years after the development project is in place and impacting the transportation network. In any case, does the 5 year rule of Government Code 6600.1 apply?

June 10, 1991

Page 4

- Page 50. The 180 days allowed for development of deficiency plans and impact analysis programs following adoption of the CMP may be difficult for many jurisdictions to comply with. Details of deficiency plan requirements should be developed as soon as possible. This is also true of other requirements, particularly the trip reduction ordinance requirement, which only allows 30 days for local adoption following the CMP adoption.
- Appendix A. The title of this appendix should be revised or the appendix redistributed. It includes much more than the title implies.
- Appendix B. The first line of the document in this appendix is labeled "Appendix A".
- Appendix B, Part C. 6. requires transit operators to define the percent of trips using transit for a zone of the City. This may be difficult for many operators to determine. Flexibility in response to this and subsequent questions may be required. In many cases only a rough estimate or a predetermined assumption of mode split may be available.
- Appendix D. The traffic impact analysis guidelines are not clear on what size of project an analysis is required for. Also, deficiencies are not defined and the mitigation measures do not include a TDM program.

If I may be of any assistance, please contact me.

Sincerely,



JAMES A. BIERY
Director of Public Works

JAB:sp/lc

23



RTD

Alan F. Pegg
General Manager

October 4, 1991

TO: Board of Directors

FROM: Alan F. Pegg

SUBJECT: Consider the General Manager's Report Recommending endorsement of the District Response to the LACTC Draft Congestion Management Program

RECOMMENDATION

It is recommended that the Board of Directors endorse the appended letter from Alan Pegg to Neil Peterson, expressing District concerns about the Congestion Management Plan (CMP).

BUDGET IMPACT

The concerns expressed in the letter are over the type of services the District will have to provide, and forego, due to CMP priorities. If the Transit Monitoring Network continues to emphasize long-haul over local service, then capital investment will tend to move away from support of high demand services. If Proposition C revenues are diverted from transit operations to CMP capital projects, then operating budgets could be significantly impacted. Budgetary impacts are more fully explicated in the appended letter, as well as in the Board Box item on the CMP distributed prior to the September 26, 1991, Board of Directors meeting.

TRANSIT

BACKGROUND

An early draft of the CMP was circulated in April. District staff met with Commission staff on several occasions as subsequent drafts were developed. An extensive list of suggested improvements to the CMP was forwarded to the Commission on June 11, 1991. The District does not feel that its basic concerns were addressed in the Final Draft of the CMP.

The main concern is that the transit element of the CMP subordinates transit to highway considerations. A more appropriate arrangement, one that would be within the parameters of the enabling legislation, would allow the transit element to address the problem of transit congestion in the attempt to resolve overall transportation congestion. As it now stands, the CMP emphasizes express service over local service because express buses are more likely to use the CMP highway network. Unfortunately, the most overcrowded, the most heavily used, and the most intensively used lines are local lines. While almost all express lines are put in the CMP's transit monitoring network, over half of most congested lines are omitted. Since most

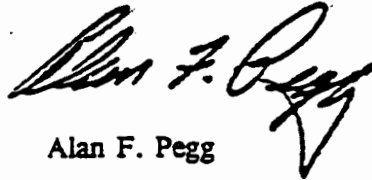
Board of Directors
October 4, 1991
Page 2

express bus and rail riders are expected to start or complete their trips on local buses, supporting the long-haul service but not the local service is a self-defeating strategy for increasing transit's modal split. The CMP transit element will continue to allow the bulk of transit delivery to be overcrowded, making it unattractive to discretionary riders.

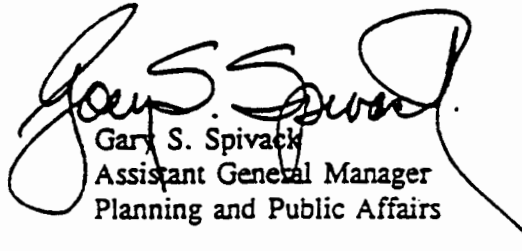
A second concern is that long-haul service benefits suburbanites; the transit dependent are more likely to use local services. The CMP transit element, as it is currently constituted, would benefit the middle class far more than those who are less fortunate.

The appended letter should not be construed as being against further investment in rail or express service. Rather, it should be seen as a plea for a more balanced investment strategy, in which alleviation of overcrowding on local lines is a necessary prerequisite to increasing patronage for every type of service.

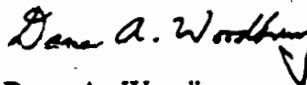
Respectfully,



Alan F. Pegg



Gary S. Spivack
Assistant General Manager
Planning and Public Affairs



Dana A. Woodbury
Director of Planning

Attachment

APPENDIX C

-REVISED DRAFT-

MODEL ORDINANCE FOR LOCAL GOVERNMENT COMPLIANCE WITH THE
REQUIREMENTS OF THE CONGESTION MANAGEMENT PROGRAM RELATING
TO TRIP REDUCTION AND TRAVEL DEMAND MEASURES

ORDINANCE NO. _____

AN ORDINANCE OF THE CITY OF _____ [COUNTY
OF LOS ANGELES] ADOPTING TRIP REDUCTION AND TRAVEL
DEMAND MEASURES IN ACCORDANCE WITH STATE GOVERNMENT
CODE SECTIONS 65089 AND 65089.3

WHEREAS, the Legislature of the State of California has found that the lack of an integrated transportation system and the increase in the number of vehicles are causing traffic congestion that each day results in hundreds of thousands of hours lost in traffic, tons of pollutants released into the air and millions of dollars of added costs to the motoring public; and

WHEREAS, the Legislature has adopted legislation requiring the preparation and implementation of a Congestion Management Program ("CMP") by county transportation commissions or other public agencies of every county that includes an urbanized area; and

WHEREAS, the Los Angeles County Transportation Commission ("LACTC") is responsible for the preparation of the CMP for Los Angeles County ("County"); and

WHEREAS, the CMP must contain a trip reduction and travel demand management element that promotes alternative transportation methods, such as carpools, vanpools, transit, bicycles, walking and park-and-ride lots, improvement in the balance between jobs and housing, and other strategies, including flexible work hours, telecommuting and parking management programs; and

WHEREAS, the County and every city within the County is required by state law to adopt and implement a Transportation Demand Management (TDM) ordinance as an important element of the Congestion Management Program to improve both congestion and air quality; and

6/24/92

-REVISED DRAFT-

WHEREAS, LACTC must determine annually whether the County and cities within the County are conforming to the CMP, including the requirement to adopt and implement a TDM ordinance; and

WHEREAS, because the CMP is an evolving program which will be developed incrementally, as experience is gained through its implementation, this TDM ordinance may be amended or superseded from time to time, as necessary to meet congestion and air quality goals;

WHEREAS, the State Clean Air Act requires regions to attain a 1.5 vehicle occupancy during the commute period by the year 1999;

WHEREAS, this ordinance is intended to comply with the CMP's requirements for a TDM ordinance. The requirements of South Coast Air Quality Management District ("District") Regulation XV, are separate from this ordinance, and administrated by the Air District. Nothing herein is intended, nor shall it be construed, to limit or otherwise preclude employers from offering or providing additional inducements to use alternatives to single-occupant vehicles to their employees necessary to meet Regulation XV requirements; and

WHEREAS, in order to use the existing and planned transportation infrastructure more efficiently, maintain or improve traffic levels of service, and lower motor vehicle emissions, it is the policy of the City of _____ [County of Los Angeles] to minimize the number of peak period vehicle trips generated by additional development, promote the use of alternative transportation, improve air quality and participate in regional and countywide efforts to improve transportation demand management;

NOW THEREFORE, the City Council of the City of _____ [Board of Supervisors of the County of Los Angeles] does ordain as follows:

SECTION 1. DEFINITIONS

The following words or phrases shall have the following meanings when used in this ordinance:

- A. "Alternative Transportation" means the use of modes of transportation other than the single passenger motor Vehicle, including but not limited to Carpools, Vanpools, Buspools, public transit, walking and bicycling.

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- B. "Applicable Development" means any development project that is determined to meet or exceed the project size threshold using the criteria contained in Section 3 of this ordinance.
- C. "Buspool" means a Vehicle carrying sixteen or more passengers commuting on a regular basis to and from work with a fixed route, according to a fixed schedule.
- D. "Carpool" means a Vehicle carrying two to six persons commuting together to and from work on a regular basis.
- E. "The California Environmental Quality Act (CEQA), a statute that requires all jurisdictions in the State of California to evaluate the extent of environmental degradation posed by proposed development.
- F. "Developer" shall mean the builder who is responsible for the planning, design and construction of an applicable development project. A developer may be responsible for implementing the provisions of this Ordinance as determined by the property owner.
- G. "Development" means the construction or addition of new building square footage. Additions to buildings which existed prior to the adoption of this ordinance and which exceed the thresholds defined in Section 3 shall comply with the applicable requirements but shall not be added cumulatively with existing square footage; existing square footage shall be exempt from these requirements. All calculations shall be based on gross square footage.
- H. "Preferential Parking" means parking spaces designated or assigned, through use of a sign or painted space markings for carpool and vanpool vehicles carrying commute passengers on a regular basis that are provided in a location more convenient to a place of employment than parking spaces provided for single occupant vehicles.
- I. "Property Owner" means the legal owner of a Development who serves as the lessor to a tenant. The Property Owner shall be responsible for complying with the provisions of the ordinance either directly or by delegating such responsibility as appropriate to a tenant and/or his agent.
- J. "Residential" means...

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- K. "South Coast Air Quality Management District" (SCAQMD) is the regional authority appointed by the California State Legislature to meet federal standards and otherwise improve air quality in the South Coast Air Basin (the non-desert portions of Los Angeles, Orange, Riverside, and San Bernardino Counties).
- L. "Tenant" means the lessee of facility space at an applicable development project.
- M. "Transportation Demand Management (TDM)" means the alteration of travel behavior -- usually on the part of commuters -- through programs of incentives, services, and policies. TDM addresses alternatives to single occupant vehicles such as carpooling and vanpooling, and changes in work schedules that move trips out of the peak period or eliminate them altogether (as is the case in telecommuting or compressed work weeks).
- N. "Trip Reduction" means reduction in the number of work-related trips made by single occupant vehicles.
- O. "Vanpool" means a Vehicle carrying seven or more persons commuting together to and from work on a regular basis, usually in a vehicle with a seating arrangement designed to carry seven to fifteen adult passengers, and on a prepaid subscription basis.
- P. "Vehicle" means a motor vehicle powered by conventional fuels (diesel and gasoline), not by an alternative fuel approved by the South Coast Air Quality Management District.

SECTION 2. REVIEW OF TRANSIT IMPACTS

Prior to approval of any development project for which an Environmental Impact Report (EIR) will be prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) or based on a local determination, regional and municipal fixed-route transit operators providing service to the project shall be identified and consulted with. Projects for which a Notice of Preparation (NOP) for a Draft EIR has been circulated pursuant to the provisions of CEQA prior to the effective date of this ordinance shall be exempted from its provisions. The "Transit Impact Review Worksheet", contained in the Los Angeles County Congestion Management Program Manual, or similar

-REVISED DRAFT-

worksheets, shall be used in assessing impacts. Pursuant to the provisions of CEQA, transit operators shall be sent NOP for all contemplated EIR's and shall, as part of the NOP process, be given opportunity to comment on the impacts of the project, to identify recommended transit service or capital improvements which may be required as a result of the project, and to recommend mitigation measures which minimize automobile trips on the CMP network. Impacts and recommended mitigation measures identified by the transit operator shall be evaluated in the Draft Environmental Impact Report prepared for the project. Related mitigation measures adopted shall be monitored through the mitigation monitoring requirements of CEQA.

Phased development projects, development projects subject to a development agreement, or development projects requiring subsequent approvals, need not repeat this process as long as no significant changes are made to the project. It shall remain the discretion of the lead agency to determine when a project is substantially the same and therefore covered by a previously certified EIR.

SECTION 3. TRANSPORTATION DEMAND AND TRIP REDUCTION MEASURES

A. APPLICABILITY OF REQUIREMENTS

Prior to approval of any development project, the applicant shall make provision for, as a minimum, all of the following applicable transportation demand management and trip reduction measures.

This ordinance shall not apply to projects for which a development application has been deemed "complete" by the City (County) pursuant to Government Code Section 65943, or for which a Notice of Preparation for a DEIR has been circulated or for which an application for a building permit has been received, prior to the effective date of this ordinance.

All facilities and improvements constructed or otherwise required shall be maintained in a state of good repair.

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B. DEVELOPMENT STANDARDS

(1) Non-Residential Development of 25,000 square feet or more shall provide the following to the satisfaction of the City [County]:

A. A bulletin board, display case, or kiosk displaying transportation information located where the greatest number of employees are likely to see it. Information in the area shall include, but is not limited to, the following:

1. Current maps, routes and schedules for public transit routes serving the site;
2. Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operators;
3. Ridesharing promotional material supplied by commuter-oriented organizations;
4. Bicycle route and facility information, including regional/local bicycle maps and bicycle safety information;
5. A listing of facilities available for carpoolers, vanpoolers, bicyclists, transit riders and pedestrians at the site.

(2) Non-Residential projects of 50,000 square feet or more shall comply with Section 3.B(1) above and shall provide all of the following measures to the satisfaction of the City [County]:

A. Not less than 10% of employee parking area, shall be located as close as is practical to the employee entrance(s), and shall be reserved for use by potential carpool/vanpool vehicles, without displacing handicapped and customer parking needs. This preferential carpool/vanpool parking area shall be identified on the site plan upon application for building permit, to the satisfaction of City [County]. A statement that preferential carpool/vanpool spaces for employees are available and a description of the method for obtaining such spaces must be included on the required transportation information board. Spaces will be signed/striped as demand warrants; provided that at all times at least one space for projects of 50,000 square feet to 100,000 square feet and two spaces for projects over 100,000 square feet will be

-REVISED DRAFT-

signed/striped for carpool/vanpool vehicles.

- B. Preferential parking spaces reserved for vanpools must be accessible to vanpool vehicles. When located within a parking structure, a minimum vertical interior clearance of 7'2" shall be provided for those spaces and accessways to be used by such vehicles. Adequate turning radii and parking space dimensions shall also be included in vanpool parking areas.
- C. Bicycle racks or other secure bicycle parking shall be provided to accommodate 4 bicycles per the first 50,000 square feet of non-residential development and 1 bicycle per each additional 50,000 square feet of non-residential development. Calculations which result in a fraction of 0.5 or higher shall be rounded up to the nearest whole number. A bicycle parking facility may also be a fully enclosed space or locker accessible only to the owner or operator of the bicycle, which protects the bike from inclement weather. Specific facilities and location (e.g., provision of racks, lockers, or locked room) shall be to the satisfaction of the City [County].

(3) Non-Residential projects of 100,000 square feet or more shall comply with Sections 3.B(1) and 3.B(2) above, and shall provide all of the following measures to the satisfaction of the City [County]:

- A. A safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers.
- B. Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development.
- C. If determined necessary by the City [County] to mitigate the project impact, bus stop improvements must be provided by developments that are located along high-traffic-volume streets and established bus routes. The City [County] will consult with the local bus service providers in determining appropriate improvements.
- D. Safe and convenient access from the external circulation system to bicycle parking facilities onsite.

-REVISED DRAFT-

SECTION 4. MONITORING

- A.** [THE ORDINANCE SHALL INCORPORATE APPROPRIATE PROVISIONS FOR MONITORING PROJECT COMPLIANCE WITH THE STANDARDS REQUIRED HEREIN. THE SELECTION OF MONITORING METHODS IS LEFT TO THE DISCRETION OF THE CITY [COUNTY]. EXAMPLES OF RECOMMENDED MONITORING INCLUDE SITE MONITORING PRIOR TO THE ISSUANCE OF A CERTIFICATE OF OCCUPANCY OR BUSINESS LICENSE.]

SECTION 5. ENFORCEMENT

- A.** [THE ORDINANCE SHALL INCORPORATE APPROPRIATE PROVISIONS FOR ENFORCEMENT OF THE STANDARDS REQUIRED HEREIN. THE SELECTION OF ENFORCEMENT METHODS IS LEFT TO THE DISCRETION OF THE CITY [COUNTY]. EXAMPLES OF RECOMMENDED ENFORCEMENT METHODS INCLUDE REFERENCING EXISTING ENFORCEMENT AND COMPLIANCE PROVISIONS IN A JURISDICTIONS ZONING CODE.]

-REVISED DRAFT-

SECTION 6. This ordinance shall take effect upon the expiration of 30 days from the date of its publication.

INTRODUCED AND FIRST READ at a duly called meeting of the City Council [Board of Supervisors] held on _____.

PASSED, APPROVED AND ADOPTED this ____ day of _____ by the following vote:

AYES:

NOES:

Mayor
[Chairman, Board of Supervisors]

ATTEST:

APPROVED AS TO FORM:



1992 ADOPTED
STATE TRANSPORTATION IMPROVEMENT PROGRAM
STATE TRANSPORTATION PROJECT COSTS

DATE 04/06/92

\$ IN PARENS ARE NOT SHA OR BOND FUNDS
TEC=TOTAL ESCALATED COST - ALL CAPITAL
OUTLAY FUNDS (\$ IN THOUSANDS)

RAMIS - DC
DIST REVU

D I S T R I C T 0 7
L O S A N G E L E S

PAGE 1

DIST RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR1	PROJECT DESCRIPTION	PREV PROG CONSTR RW 91/92	COST RW ESCAL CONSTR 1/92	PROGRAM SCHEDULE						
				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 9101 04280 / MCCR CRR LOC CRR 90	GLENDALE TRANSPORTATION CENTER STAGE 1 PURCHASE PROPERTY, STATION; CONSTR PARKING STRUCTR, UPGRD MLTIMODL USE STIP AMEND 90-9 SEE #9101A 92FY	3100 (3100)	3100 C (3100)C							
07 9101A 04280 / MCCR CRR LOC CRR 90	GLENDALE TRANSPORTATION CENTER STAGE 2 PURCHASE PROPERTY, STATION; CONSTR PARKING STRUCTR, UPGRD MLTIMODL USE STIP AMEND 90-9 SPLIT FR #9101 TEC: 6158		3079 C (3079)C	3079 (3079)						
07 9102 04412 / MCCR CRR LOC CRR 90	COMMUTER RAIL SHARED FACILITIES AT UNION STATION IN DOWNTOWN LA CONSTR REPAIR FAC, PURCHASE PASSENGR INFO EQPMNT, IMPRV TRACK, SIG, BR, CULV STIP AMEND 90-9 92FY	10500 (10500)	10500 C (10500)C							
07 9103 04412 / MCCR CRR LOC CRR 90	LOS ANGELES-SAN BERNARDND COMM RAIL SBD TO UNION STATION IN DNTN LA R/W RELATED IMPRVMENTS, PURCHASE ROLL ING STOCK-56 MI FAC ON SPRR/SFRR RW STIP AMEND 90-9 92FY	27500 (27500)	27500 C (27500)C							
07 9104 04412 / MCCR CRR LOC CRR 90	LOS ANGELES-VENTURA COMMUTER RAIL FROM MOORPARK/UNION STATION DNTN LA CONST R/W REL. IMPRVMENTS & PURCHASE RDLLING STOCK-47 MI FAC ON SPRR R/W STIP AMEND 90-9 92FY	17800 (17800)	17800 C (17800)C							

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APPENDIX D

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DIST	PROJ RTE	LOCATION ID E/A	PROJECT DESCRIPTION	PREV PROG CONSTR	COST RW ESCAL	PROGRAM SCHEDULE						
						4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC
				RW	CONSTR	1.045	1.092	1.141	1.193	1.246	1.302	1.361 CUM
				91/92	1/92	92/93	93/94	94/95	95/96	96/97	97/98	98/99
07	9105	O4412 /	REGIONAL COMMUTER RAIL IN LA, ORA, RIV, SBD COUNTIES	22300 (22300)	51800 R (51800)R		29500 (29500)					
			ACQUIRE RR R/W JOINT BID \$320M R/W ONLY 92FY STIP AMEND 90-4,5,12,9,18 G92-02 TEC: 59000									
07	9105A	O4412 /	REGIONAL COMMUTER RAIL IN LA COUNTY AT SOUTHERN PACIFIC TAYLOR YARD PROPERTIES	41600 (41600)	41600 R (41600)R							
			ACQUIRE RR R/W R/W ONLY POR JOINT BID \$320M STIP AMEND 90-4									
07	9105B	O4412 /	REGIONAL COMMUTER RAIL IN LOS ANGELES CO AT BALDWIN PARK	10300 (10300)	10300 R (10300)R							
			ACQUIRE RR R/W R/W ONLY POR JOINT BID \$320M STIP AMEND 90-5, 12									
07	9105C	O4412 /	REGIONAL COMMUTER RAIL IN LOS ANGELES CO AT SAUGUS	11000 (11000)	11000 R (11000)R							
			ACQUIRE RR R/W RW ONLY POR JOINT BID \$320M STIP AMEND 90-9,12 91 @3400, BAL 92									
07	9105D	O4412 /	REGIONAL COMMUTER RAIL IN LOS ANGELES COUNTY VENTURA MAIN LINE	8900 (8900)	8900 R (8900)R							
			ACQUIRE RR R/W R/W ONLY POR JOINT BID \$320M STIP AMEND 90-12 91FY									

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DIST RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR1	PROJ RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR1	PROJECT DESCRIPTION	PREV PROG CONSTR RW 91/92	COST RW ESCAL CONSTR 1/92	PROGRAM SCHEDULE						
					4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 04412 / MCCR CRR LOC CRR 90	9107	LOS ANGELES-SANTA CLARITA COMM RAIL FROM SO. SANTA CLARITA VALLEY TO UNION STATION IN DNTN LA RELATED IMPRVMENTS & PURCHASE ROLL- ING STOCK--32 MI FAC/EXSTNG SPRR RW STIP AMEND 90-9 92FY	18600 (18600)	18600 C (18600)C							
D4 07 04412 / MURR URR LOC URR 90	9108	NORTH COAST LIGHT RAIL NORWLK/EL SEGUNDO, RTE 105 TO WEST- CHESTER VIA LA INTL AIRPORT LOT C CONSTRUCT 2.8 MILE FACILITY STIP AMEND 90-9 92FY TEC: 154800	29000 (29000)	106400 C (106400)C		77400 (77400)					
07 04412 / MURR URR LOC URR 90	9109	PASADENA-LOS ANGELES LIGHT RAIL SIERRA MADRE VILLA/UNION STATION CONSTRUCT 13.6 MILE FACILITY STIP AMEND 90-9 92FY TEC: 633200	21200 (21200)	337800 C (337800)C		316600 316600					
07 04412 / MURR URR LOC URR 90	9110	METRO RAIL - MOS 3 HOLLYWOOD BLVD/VINE TO LANKERSHIM BLVD/CHANDLER BLVD CONSTRUCT 6.3 MILE AND 3 STATIONS TEC: 190000		95000 C (95000)C		95000 (95000)					
07 04412 / MURR URR LOC URR 90	9111	SAN FERNANDO VALLEY EAST-WEST TRANS FROM NO HOLLYWOOD MOS-3 STATION TO SEPULVEDA IN VAN NUYS CONSTRUCT 5.6 MILE FACILITY TEC: 992994		496497 C (496497)C		496497 496497					

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DIST RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR 1	PROJ RTE DESCRIPTION	PREV PROG CONSTR RW 91/92	COST RW CONSTR 1/92	PROGRAM SCHEDULE						
				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 9112 04412 / MURR URR LOC URR 90	NORWALK - EL SEGUNDO LINE BETWEEN AVIATION BLVD AND MARIPOSA AVE STATIONS CONSTRUCT EL SEGUNDO-DEL NORTE STATION STIP AMEND 90-9 TEC: 10400		R R 5200 C 5200 (5200)C (5200)							
07 9113 04412 / MURR URR LOC URR 90	NORWALK-EL SEGUNDO LIGHT RAIL ON RTE 105 - CENTURY FWY CONSTRUCT 10 TRANSIT STATIONS	3699 (3699)	R R 3699 C (3699)C							
07 9120 04412 / P116 P116 P116 92	LOS ANGELES-VENTURA COMMUTER RAIL FROM MOORPARK/UNION STATION DNTN LA CONST R/W REL. IMPRVMENTS & PURCHASE ROLLING STOCK-47 MI FAC ON SPRR R/W STIP AMEND 90-9 92FY	(35300)	R R C (35300)C							
07 9114 04620 / MCR CRR LOC CRR 90	PASADENA TRANSPORTATION CENTER PURCHASE PROPERTY & STATION, IMPROVE PARKING, IMPROVE FOR MULTIMODAL USE STIP AMEND 90-9 92FY TEC: 6000	3600 (3600)	R R 6600 C 3000 (6600)C (3000)							
07 9701 A2000 04412 / MFCR AXIX FCRX 8A	LACTC FROM HOLLYWOOD TO NORTH HOLLYWOOD METRO RAIL MOS-2 PHASE III TEC: 23700		R R 23700 C 23700 C							

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				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 9702 A2000 04412 / MFCR AXIX MTPD FCRX 8A	LACTC METRO RAIL MOS-2 CONSTRUCTION TEC: 10500	156600 (1500)	R R C 10500 C (1500)							
D 07 9703 A2000 04412 / MFCR AXIX FCRX 92	LACTC DOWNTOWN LA CONNECTING W/ E VENTURA CO, SBD CO, N LOS ANGELES CO FINAL DESIGN, CONSTRUCTION, FINISH- ING WORK--14 COMMUTER RAIL STATIONS	3277	R R C C							
07 7037 C5006 PICDBL/ 11851G HB4N FAU8 FCRL 90	IN CITY OF LOS ANGELES ON PICO BLVD SIGNAL COORDINATION SMART CORRIDOR CONCEPT TEC: 3200		R R C C 2683				3200			#
07 7035 C5130 FREMONT/ 11849G HB4N FAU8 LOC FCRL 90	IN ALHAMBRA ON FREMONT AVE FROM MISSION RD TO VALLEY BLVD ADD SB THROUGH LANE AND RIGHT TURN LANE TEC: 2287		R R C C 1238 (680)				1477 (810)			#
07 7034 C5144 GLENDA/ 11848G HB4N FAU8 FCRL 90	IN GLENDALE CENTRAL BUSINESS DISTRICT EXPAND CENTRALIZED SIGNAL COMPUTER SYSTEM TEC: 1216		R R C C 1019				1216			#

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				4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC	
07 7056 C5362 ATLANT/ 12680K HE11 FAUB CITY FCRL 92	IN CITY OF COMMERCE ON ATLANTIC BLVD "MIXMASTER" ADJACENT TO THE SANTA ANA FW MODIFY INTERSECTION OF FIVE SURFACE STREETS AND RTE 5 FREEWAY RAMP TEC: 16332		R R 6000 C (6000)C	1.045	1.092	1.141	1.193	1.246	1.302	1.361 CUM	8166 (8166)
D-7 07 7057 C5403 DELAMO/ 12690K HE11 FAUB CITY FCRL 92	IN CARSON ON DEL AND BLVD AT RTE 405 CONSTRUCT FOUR-LANE OVERCROSSING TEC: 17700		R R 7495 C (5511)C								10200 (7500)
07 7053 F5953 VALLEY/ 12700K HE12 FAUB LOC FCRL 92	FROM ALHAMBRA TO EL MONTE ON VALLEY BLVD BETWEEN RTE 710 AND SANTA ANITA AVE WIDEN INTERSECTIONS AND ROADWAY AT SELECTED LOCATIONS TEC: 15000		R (3100)R 5511 C (3233)C								(3100) 7500 (4400)
07 7051 F5953 CHATSW/ 12660K MFCR STA LOC FCRM 92	IN CITY OF LOS ANGELES-CHATSWORTH BETWEEN DEVONSHIRE ST AND LASSEN ST ONE BLOCK WEST OF CANOGA AVE CONSTRUCT CHATSWORTH COMMUTER RAIL STATION ACCESS ROAD TEC: 2200		R (630)R 538 C (688)C								(630) 700 (870)
07 7050 F5953 BLUE / 12650K MFCR STA LOC CITY FCRM 92	IN LOS ANGELES AT INTERSECTION OF BLUE LINE, SPRR FREIGHT, IMPERIAL HWY, WILMINGTON AV CONSTRUCT IMPERIAL HIGHWAY OC LOC=LACTC TEC: 27600		R R 6760 C (13519)C								9200 (18400)

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				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99		
07 7032 F5953 LOSANG/ 11846G HB4N FAU8 FCRL 90	IN LA COUNTY AT VARIOUS LOCATIONS SYNCHRONIZE SIGNALS STAGE 1 STIP AMEND 90-2 TEC: 7300		6119 R R C C				7300					
D-8 07 7033 F5953 LOSANG/ 11847G HB4N FAU8 FCRL 90	IN LA COUNTY AT VARIOUS LOCATIONS SYNCHRONIZE SIGNALS STAGE 2 TEC: 10000		8026 R R C C					10000				
07 7052 F5953 ROSECR/ 12670K HE13 FAU8 LOC PVT FCRL 92	IN EL SEGUNDO AND HAWTHORNE AT THE INTERSECTION OF ROSECRANS AVENUE AND AVIATION BOULEVARD RECONSTRUCT INTERSECTION, WIDEN RR OVERPASS FOR ADDL TURN & THRU LANES TEC: 11400		(2820)R 538 R (6052)C C			(2820)				700 (7880)		
07 7014 F5953 CRENSH/ 11768G HB4N FAU8 FCRL 90	FROM LOS ANGELES TO TORRANCE ON CRENSHAW BLVD, FROM WILSHIRE TO CREST UPGRADE SYNCHRONIZED SIGNALS TEC: 1124		902 R R C C					1124				
07 0023G OO1 O23.4/ O25.2 10291G HE13 FAU8 FAU FCR 8A	IN MANHATTAN BEACH AND EL SEGUNDO MARINE AVE/GRAND AVE WIDEN FR 6 TO 8 LANES & CHANNELIZE MANHTNBCH=280, ELSEG=320, RFAU=2306 TEC: 7686		510 R R 3910 C (2661)C	510					4270 (2906)			

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				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 0978T 005 000.0/ 006.8 101670 HE13 IR FCR 8A	NEAR BUENA PARK & SANTA FE SPRINGS FROM ROUTE 91 TO ROUTE 605 (SEE 12-#0978T) EXISTING 6-LN FWY. ADD 2 MIXED FLOW LANES & 2 HOV LANES FIXED AMT--UNDFND R/W ONLY TEC: 100		100 R R C C	100						
D-9 07 0090G 005 004.5/ 006.1 02382G HB311 STA SND 8A	IN NORWALK FROM KALNOR TO IMPERIAL AND FROM SPRR TO CECILIA (POR) SOUNDWALLS: EAST (NB) SIDE FORMER PAYBACK SEC 215.5 B92V08/91 #	924	924 R R C C							
07 0091A 005 005.9/ 006.4 01318P HB311 STA SND 90	IN NORWALK FROM ORR AND DAY RD OH TO FLORENCE AVE SOUNDWALL: EAST (NB) SIDE SEC 215.5 PAYBACK FOR 01318G TEC: 602 #		483 R R C C				602			
07 0091D 005 005.9/ 006.4 02385G HB311 IR SND 90	NEAR NORWALK FROM ORR AND DAY RD OH TO FLORENCE AVE SOUNDWALL: WEST (SB) SIDE TEC: 1012 #		887 R R C C			1012				
07 0094S 005 007.1/ 008.9 11171G HB311 IR SND 8A	IN DOWNEY FROM SAN GABRIEL RIVER TO PARAMOUNT BLVD SOUNDWALLS: WEST (SB) SIDE TEC: 3913 #	79	79 R R C C		3583		3913			

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					4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% 1.361 98/99	ESC CUM	
07 010 029.9/ 030.7 00263G HB311 IR SND	0301	IN EL MONTE FROM LANSDALE STREET TO 0.1 MILES WEST OF SAN GABRIEL RIVER SOUNDWALLS:BOTH SIDES (POR)	#	5764	R R C C	6023							
07 010 031.1/ 033.5 005880 HB4C IR FCR	0306	IN BALDWIN PARK RTE 605/PUENTE AVE:EB EXTEND SBD FWY BUSWAY, ON EXISTING 8-LN FWY, ADD EB HOV LANE	#	3270	R R C C	3417							
07 010 033.6/ 045.0 11172G HB311 IR SND	0309S	WEST COVINA TO POMONA FROM 0.2 MILES EAST OF PUENTE TO 0.3 MILES WEST OF WHITTIER SOUNDWALLS:BOTH SIDES		2845	R R C C	2973							#
07 010 042.9/ 043.3 02389G HB311 IR SND	0317M	IN POMONA FROM 0.2 MILES EAST OF RTE 71 OC TO 0.4 MILES WEST OF GANESHA SDUNWALLS:SOUTH (EB) SIDE	1213	1213	R R C C								#
07 010 044.2/ 045.7 05353G HB311 IR SND	0319	IN POMONA FROM DUDLEY TO GAREY SOUNDWALLS:BOTH SIDES	B92	4200	R R C C	5011							#

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					4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% 1.361 98/99
07 030 002.4/ 10501G HE14 FAUB FCR	0412A 008.3	IN LA VERNE AND CLAREMONT FROM FOOTHILL BL TO SAN BERNARDINO COUNTY LINE CONSTRUCT 6-LANE FREEWAY INCLUDING 2 HOV LANES FIXED AMT--UNDFND R/W ONLY TEC: 87157		87157 R R C C				24517	62640		
D-13 07 030 004.1/ 10289G HB4C FAUB FCR	0417T 004.8	IN CLAREMONT FROM WILLIAMS AVE TO COLLEGE WAY CONVERT FROM 2-LANE TO 4-LANE CONVENTIONAL HIGHWAY, REALIGNMENT TEC: 10290		2209 R R 6560 C C	2209				8081		
07 030 004.8/ 105030 HE13 STAM FAU FCR	0418W 005.2	IN CLAREMONT FROM COLLEGE WAY TO TOWNE AVE (POR) WIDEN FROM 2-LANES TO 4-LANES CONVENTIONAL HIGHWAY B92	(460) 81 (498)	(460)R 81 C (498)C							
07 030 005.2/ 102900 HE13 FAUB CITY FCR	0421F 007.7	IN CLAREMONT BASE LINE RD: TOWNE AV/SBD CO L WIDEN FROM 2-LANES TO 4-LANES CONVENTIONAL HIGHWAY B92	(1091) 521	(1091)R 521 C C							
07 030 R005.6/ 12640K HE12 FAUB FCR	0422 R007.5	IN CLAREMONT FROM TOWNE AVENUE TO 0.1 MILE WEST OF PADUA AVENUE CONSTRUCT NEW 8-LANE FREEWAY INCLUD ING 2 HOV LANES TEC: 72000		4100 R R 49890 C C				4100			67900

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					4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC	
07 0496F 060 019.0/ 019.5 02396G HB311 STA SND 92		IN CITY OF INDUSTRY FROM 0.5 MILE W/O FULLERTON RD TO FULLERTON RD SOUNDWALLS:EB TEC: 1934		1421	1.045 92/93	1.092 93/94	1.141 94/95	1.193 95/96	1.246 96/97	1.302 97/98	1.361 98/99	CUM 1934
D-15 07 0497F 060 020.5/ 021.0 02397G HB311 F SND 8A		IN CITY OF INDUSTRY FROM NOGALES TO WALNUT SOUNDWALLS:EB B92	776 #	776								
07 0501F 060 R024.9/R025.5 02399G HB311 F SND 8A		NEAR DIAMOND BAR FRDM 0.5 MILE EAST OF GRAND TO PROSPECTORS SOUNDWALLS:NORTH (WB) SIDE B92	924 #	924								
07 0503A 060 R028.3/R030.3 384110 HE11 F FCR 8A		NEAR POMONA AT ROUTE 71 INTERCHANGE (INCLUDES 08-#0234C) CONSTRUCT NB/WB & SB/EB CONNECTIONS IC RECONSTRUCTION STAGE 1 SEE #05110 FOR BALANCE OF STG 1 TEC: 15359	600 #	600	14702 C							15359
07 0503E 060 R028.3/R030.3 11854G HE12 F FCR 90		IN POMONA AT ROUTE 71 INTERCHANGE RECONSTRUCT IC STAGE 3 SEE 08-#0503E FOR BALANCE OF FUNDS TEC: 17668		2037		2037						15631

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					4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 060 RO28.3/RO30.3 11584G HE12 F FCR	0511Q BA	NEAR POMONA AT ROUTE 71 INTERCHANGE RECONSTRUCT IC BALANCE OF STAGE 1 (SEE #0503A) AND STAGE 2 POMONA \$4M ESC TEC: 35023		R R 29553 C 30874 (3972)C (4149)	#						
D-16 07 091 RO06.4/RO20.7 11586G HB5 F FCR	0530C 90	NEAR LOS ANGELES FROM RTE 110 TO ORANGE CO LINE TO EXISTING 8-LANE FREEWAY ADD EB & WB HDV LANES TEC: 2091		R R 1754 C C				2091			#
07 091 RO17.3/RO18.1 Q2044G HB311 F SND	0556N 90	NEAR ARTESIA AND CERRITOS FROM 0.2 MILES WEST OF GRIDLEY TO PIONEER SOUNDWALLS:BOTH SIDES TEC: 523		R R 438 C C				523			#
07 101 S000.2/S001.3 001911 HB311 F SND	0567 BA	IN LOS ANGELES - BOYLE HEIGHTS FROM WHITTIER BLVD TO MISSION RD SOUNDWALLS:BOTH SIDES TEC: 3423	9	9 R R 3276 C 3423 C	#						
07 101 001.6/ 004.4 499341 HB311 F SND	0574 BA	IN LOS ANGELES - DOWNTOWN FROM BEAUDRY TO VERMONT SOUNDWALLS:BOTH SIDES TEC: 3699		R R 3540 C 3699 C	#						

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				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 0585A 101 007.5/ 007.7 11157G HB311 F SND 92	NEAR HOLLYWOOD FROM CAHUENGA BLVD TO 00IN ST SOUNDWALLS:NB & SB TEC: 1588		16 R 1155 R C C							16 1572
D-17 07 0603 101 011.6/ 012.6 05352G HB311 F SND 90	IN NORTH HOLLYWOOD FROM ROUTE 170 TO RADFORD AVE SOUNDWALLS:EAST (NB) SIDE TEC: 1918		1608 R R C C				1918			#
07 0616C 101 011.7/ 018.6 11474G HB4C F FCR 8A	NEAR STUDIO CITY & SHERMAN OAKS RTE 170/RTE 405 (POR) ADD NB MIXED FLOW LANE BY RESTRIPIPING TEC: 4320		75 R 4062 R C C	75 4245						#
07 0607 101 012.6/ 013.3 00224G HB311 F SND 90	IN STUDIO CITY FROM RADFORD TO TUJUNGA WASH SOUNDWALLS:BOTH SIDES TEC: 2019		1770 R R C C			2019				#
07 0621M 101 019.3/ 020.1 020451 HB311 F SND 8A	IN ENCINO FROM BALBOA TO 0.1 MILE EAST OF WHITE OAK SOUNDWALLS:WEST (SB) SIDE B92V01/92	850	850 R R C C							

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					4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC				
07 105 ROO1.7/ 11413G HE14 I FCR	0641B 8A	NEAR INGLEWOOD AT AVIATION BLVD PARK & RIDE LOT TEC: 2853	CENTURY FWY (#37-2)		R R C C #	2731	2853								
D-19 07 105 ROO1.7/ 11421G HE14 IR LOC FCR	3641E 8A	NEAR INGLEWOOD AT AVIATION BLVD TRANSIT STATION STAGE 2 B91	CENTURY FWY (#37-4)	122 (686)	R R C C #		122	(686)							
07 105 ROO2.5/ROO5.5 11500G HE14 I FCR	0641H 8A	NEAR INGLEWOOD FROM INGLEWOOD AVE TO WILTON PLACE WIDENING, SIGNS, SIGNALS, STRIPING, PAVEMENT MARKERS TEC: 2380	CENTURY FWY (#61)	248	R R C C #	248	2278	2380							
07 105 ROO2.5/ROO4.5 06049Y HB32 I FCR	0645Y 8A	NEAR INGLEWOOD FROM INGLEWOOD TO 0.3 MILES WEST OF CRENSHAW HIGHWAY PLANTING PORTION OF #0642C CAT-3 TEC: 748	CENTURY FWY (#38)		R R C C #	716	748								
07 105 ROO3.1/ 11322G HE14 IR LOC FCR	0642E 8A	NEAR INGLEWOOD AT HAWTHORNE BLVD CONSTRUCT PARK & RIDE LOT TEC: 2179	CENTURY FWY (#51-2)	1344	R R C C #	1344	1139 (946)	1190 (989)							

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										RW ESCAL	4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC
								RW	CONSTR	92/93	93/94	94/95	95/96	96/97	97/98	98/99	CUM
								91/92	1/92								
07	0642I	105					NEAR HAWTHORNE & NORWALK CENTURY HAWTHORNE BLVD/RTE 605 (#44-12)			R							
	RO03.1/RO17.8						PROCURE ELEVATORS AND ESCALATORS FOR TRANSIT STATIONS	2299 (3515)	2299 C (3515)	R							
	11999G																
	HE14																
	I	LOC															
	FCR	90					B92	#									
07	2642Y	105					NEAR INGLEWOOD CENTURY FWY AT HAWTHORNE BLVD (#51-2)			R							
	RO03.1/00775Y						HIGHWAY PLANTING PORTION OF #0642E CAT-3		88 C	R	92						
	HB32																
	IR																
	FCR	8A					TEC: 92										
07	3642H	105					NEAR INGLEWOOD CENTURY FWY AT HAWTHORNE BLVD (#51-3)			R							
	RO03.1/11422G						COMPLETE HAWTHORNE BLVD TRANSIT STATION		349 C (755)	R	365 (789)						
	HE14																
	STA	LOC															
	FCR	8A					TEC: 1154										
07	2645Y	105					NEAR INGLEWOOD CENTURY FWY FROM LEMOLI TO WILTON (#32-5)			R							
	RO04.2/RO05.6						HIGHWAY PLANTING PORTION OF #2642C CAT-3	602	602 C	R							
	06043Y						#2642C AWARDED										
	HB32																
	I																
	FCR	8A					B91V09/91	#									
07	3642C	105					NEAR INGLEWOOD CENTURY FWY AT CRENSHAW BLVD (#32-2)			R							
	RO04.2/11323G						CONSTRUCT PARK AND RIDE LOT (HIGHWAY PLNTG #3642Y)		1175 C	R	1227						
	HE14																
	IR																
	FCR	8A					TEC: 1227										

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				4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC
07 3642Q 105 RO04.2/ 11424G HE14 IR LOC FCR BA	NEAR INGLEWOOD CENTURY FWY AT CRENSHAW BLVD (#32-4) TRANSIT STATION STAGE 2 TEC: 1440		R R 82 C 86 (1296)C (1354) #	1.045	1.092	1.141	1.193	1.246	1.302	1.361 CUM
D-21 07 3642Y 105 RO04.2/ 11321Y HB32 IR FCR BA	NEAR INGLEWOOD CENTURY FWY AT CRENSHAW BLVD PARK & RIDE (#32-2) HIGHWAY PLANTING PORTION OF #3642C CAT-3 TEC: 53		R R 50 C 53 C #							
07 0642Y 105 RO05.5/RO07.0 06042Y HB32 I FCR BA	IN LOS ANGELES CENTURY FWY FROM WILTON TO HOOVER (#33-3) HIGHWAY PLANTING PORTION OF #0642S CAT-3 TEC: 676		R R 647 C 676 C #							
07 3646R 105 RO05.5/RO07.8 11501G HE14 I FCR BA	IN LOS ANGELES CENTURY FWY FROM WILTON PLACE TO MAIN ST (#62) SIGNS, SIGNALS, STRIPING, PAVEMENT MARKERS TEC: 2380	7	7 R R 2278 C 2380 C #							
07 0643W 105 RO06.7/RO07.8 11816G HE14 IR LOC FCR BA	IN LOS ANGELES CENTURY FWY AT VERMONT (#46-6) TRANSIT STATION STAGE 2 TEC: 771		R R 257 C 263 (480)C (502) #							

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DIST RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR1	PROJ ID	PROJECT DESCRIPTION	PREV. PROG CONSTR	COST RW CONSTR	PROGRAM SCHEDULE						
					92/93	93/94	94/95	95/96	96/97	97/98	98/99
07 105 RO09.8/ 11326G HE14 IR FCR	0645B 8A	IN LOS ANGELES CENTURY FWY AT WILMINGTON AVE (#44-4) CONSTRUCT PARK AND RIDE LOT B92	1351	1351	1.045	1.092	1.141	1.193	1.246	1.302	1.361 CUM
07 105 RO09.8/ 11818G HE14 IR LOC FCR	0645G 8A	IN LOS ANGELES CENTURY FWY AT WILMINGTON AVE (#44-11) TRANSIT STATION STAGE 2 B92	194 (2272)	194 (2272)							
07 105 RO10.3/RO10.9 HE I FCR	3646L 92	IN LOS ANGELES AND LYNWOOD BETWEEN MONA BLVD AND STATE STREET REALIGNMENT OF IMPERIAL HIGHWAY TO REMOVE HAZARDOUS MATERIALS POR OF 0646A TEC: 10500	#	9615				10500			
07 105 RO10.9/RO12.9 00739Y HB32 I FCR	2646Y 8A	IN LYNWOOD CENTURY FWY FROM SANTA FE TO ATLANTIC (#45) HIGHWAY PLANTING PORTION OF #2646B CAT-3 #2646B AWARDED B92V09/91	811	811							
07 105 RO11.6/ 11327G HE14 IR FCR	0644T 8A	IN LYNWOOD CENTURY FWY AT LONG BEACH BLVD (#44-2) CONSTRUCT PARK AND RIDE LDT (HWY PLNTG #0648Y) B92V01/92	804	804							

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						4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC	
				RW 91/92	CONSTR 1/92	92/93	93/94	94/95	95/96	96/97	97/98	98/99
07	0644U	105	IN LYNWOOD CENTURY FWY AT LONG BEACH BLVD (#44-1A)									
		RO11.6/11458G	REHAB PERR DEPOT (HISTORICAL SITE)	600	600							
		HE14										
		IR										
		FCR	8A	B92	#							
07	0648Y	105	IN LYNWOOD CENTURY FWY AT LONG BEACH BLVD PARK (#44-2)									
		RO11.6/11712G	AND RIDE HIGHWAY PLANTING PORTION OF #0644T CAT-3	65	65							
		HB32										
		IR										
		FCR	8A	B92	#							
07	3644V	105	IN SOUTH GATE CENTURY FWY AT LONG BEACH BLVD (#44-8)									
		RO11.6/11428G	TRANSIT STATION STAGE 2	42 (659)	42 (659)							
		HE14										
		IR	LOC									
		FCR	8A	B92	#							
07	4646	105	IN SOUTH GATE NEAR ROUTE 105 ON MONROE AVENUE									
		RO13.6/	CONSTRUCT STORM DRAIN		2473				2701			
		HE14										
		I										
		FCR	92	TEC: 2701								
07	0646Y	105	NEAR SOUTH GATE CENTURY FWY FROM GARFIELD TO DUNROBIN (#48-4)									
		RO14.1/RO16.9	HIGHWAY PLANTING PORTION OF #0643H CAT-3	1247	1247							
		OO730Y										
		HB32										
		I										
		FCR	8A	B92	#							

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				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 2647K 105 RO17.8/ 00744G HE14 I LOC FCR 8A	IN NORWALK CENTURY FWY ROUTE 605/STUDEBAKER RD (#43-2) STRUCTURE AND RAMP (HWY PLNTG #2647Y) B92V05/91 #	7500 (1502)	7500 C (1502)C							
D-26 07 2647L 105 RO17.8/RO18.1 11978G HE14 IR FCR 8A	IN NORWALK CENTURY FWY RTE 605/STUDEBAKER ROAD (#43-5) CONSTRUCT PARK AND RIDE, REALIGN RAMPS B92V01/92 #	4310	4310 C C							
07 2647Y 105 RO17.8/ 00734Y HB32 I FCR 8A	IN NORWALK CENTURY FWY RTE 605/STUDEBAKER RD (#43-2) HIGHWAY PLANTING PORTION OF #2647K CAT-3 B92 #	386	386 C C							
07 3647K 105 RO17.8/ 11430G HE14 IR LOC FCR 8A	IN NORWALK CENTURY FWY RTE 605/STUDEBAKER RD (#43-3) NORWALK TRANSIT STATION STAGE 1 B92 #	559 (1571)	559 C (1571)C							
07 0324Y 110 RO01.1/ 007.4 11167G HA25 IR FCR 8A	IN SAN PEDRO TRANSITWAY FROM 0.2 MILE NORTH OF RTE 47 TO 0.4 MILE NORTH OF CARSON STREET REPLACEMENT PLANTING FOR #0324K AND #0324L CAT-5 #0324K AWARDED TEC: 988		946 C C	988						#

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											RW 91/92	RW 1/92	4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC	
07	0324Q							IN SAN PEDRO TRANSITWAY AT 0.1 MILE SOUTH OF CHANNEL STREET	150	5455	R	5305								
110	ROO1.3/ROO1.6							CONSTRUCT TRANSIT CENTER AND PARK AND RIDE LDT STAGE 2		2969	R C			3242						
	11017G							TEC: 8547	#		C									
07	0329H							IN WILMINGTON TRANSITWAY FROM L ST TO 0.4 MILE N OF ROUTE 1	4250	4250	R									
110	003.8/ 004.5							CONSTRUCT TRANSIT STATION AND PARK AND RIDE LOT STAGE 3		951	R C	994								
	11018G							TEC: 994	#		C									
07	0324L							IN WILMINGTON TRANSITWAY FROM L ST TO LOMITA BLVD (#1-1)	4439	4439	R									
110	003.9/ 004.6							WIDEN FREEWAY TO 8 LANES, AUXILIARY LANES AND REHAB		12359	R C	12915								
	11357G							TEC: 12915	#		C									
07	0330F							IN LOS ANGELES TRANSITWAY FROM PACIFIC COAST HIGHWAY (#18) TO EXPOSITION BLVD (POR)			R									
110	004.1/ 020.0							ELEVATORS, WINDOWS, PA SPEAKERS STAGE 2		10129	R C	11061								
	11911G							TEC: 11061	#		C									
07	0333J							NEAR CARSON TRANSITWAY FROM 223RD ST TO TORRANCE BLVD			R									
110	006.5/ 007.7							CONSTRUCT TRANSIT STATION AND PARK AND RIDE LOT STAGE 4	12700	12700	R C									
	11019G							B92V10/91	#		C									

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				4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	ESC
				1.045	1.092	1.141	1.193	1.246	1.302	1.361	CUM
				92/93	93/94	94/95	95/96	96/97	97/98	98/99	
07 0340L 110 009.9/ 011.7 11358G HB5 I IR FCR 8A	NEAR GARDENA TRANSITWAY FROM 0.1 MI N GARDENA BL TO (#6-1) REDONDO BEACH BLVD WIDEN FREEWAY, STRUCTURE, HOV AND AUXILIARY LANES, REHAB B92V06/91 #	139 4090	139 R 4090 C								
D-28 07 0340Q 110 009.9/ 110201 HB5 I FCR 8A	NEAR GARDENA TRANSITWAY AT ROUTE 91 (#5) CONSTRUCT TRANSIT CENTER, PARK AND RIDE, FLY-OVER(SB) TEC: 1241 B92 #	9902 9582	11143 R 9582 C	1241							
07 0340Y 110 009.9/ 014.7 11168G HA25 IR FCR 8A	NEAR GARDENA TRANSITWAY FROM RDUTE 91 TO 104TH STREET REPLACEMENT PLANTING FOR #0340M & #0345B CAT-5 #0340M & #0345B AWARDED TEC: 1163 #		1065 R C		1163						
07 0343L 110 R011.3/ 119081 HE14 I FCR 8A	IN LOS ANGELES TRANSITWAY FROM 0.1 MILE NORTH OF (#6-2) REDONDO BEACH BLVD TO 149TH STREET RR BR & OC & PUMP PLANT & WIDEN POR OF 0340L TEC: 4784 #		359 R 4234 C	359						4425	
07 0345A 110 011.7/ 013.5 11359G HB5 I IR FCR 8A	NEAR GARDENA TRANSITWAY FROM 140TH STREET TO (#7-1) 120TH STREET WIDEN FREEWAY, STRUCTURE, HOV LANE, STATION, PARK AND RIDE LOT TEC: 22394 #	1467	3478 R 19505 C	2011						20383	

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				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99
07 0346E 110 015.5/ 017.5 110271 HB5 I IR FCR 8A	IN LOS ANGELES TRANSITWAY FROM 92ND STREET TO GAGE AVE (#11) WIDEN FWY, STRUCTURE, HOV AND AUX LANE, REHAB, STATION, PARK AND RIDE (REPL PLNTG #0344Y) TEC: 62467	#	6713 R 6713 R 53353 C 55754 C							
D-30 07 0355J 110 017.5/ 018.8 110311 HB5 I IR FCR 8A	IN LOS ANGELES TRANSITWAY FROM GAGE AVE TO 7TH STREET (#13) WIDEN FWY, STRUCTURE, HOV LANES, STATION, RETAINING WALL (REPL PLNTG #0355Y) TEC: 44450	#	1296 R 1296 R 42536 C 44450 C							
07 0355Y 110 017.5/ 021.1 11170G HA25 IR FCR 8A	IN LOS ANGELES TRANSITWAY FROM GAGE AVE TO 0.1 MILE SOUTH OF WASHINGTON BLVD REPLACEMENT PLANTING FOR #0355J, #0355K, #0359M CAT-5 TEC: 1240			1135 C 1135 C		1240				#
07 0355K 110 018.8/ 020.2 110321 HB5 I IR FCR 8A	IN LOS ANGELES TRANSITWAY FROM 47TH ST TO JEFFERSON BL (#14) WIDEN FWY, UCS, HOV LANES, STATION, RETAINING WALLS (REPL PLNTG #0355Y) TEC: 32358	#	12584 R 12759 R 30798 C 32183 C							
07 0359T 110 019.9/ 020.5 119101 HB5 I IR FCR 8A	IN LOS ANGELES TRANSITWAY FROM 37TH ST TO 30TH ST (#16-1) WALL, REPLACE OC & UC, WIDN, MODIFY DRAINS AND TMP TEC: 874 B92	#	26724 R 26724 R 26724 C 26724 C							

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					4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC
					1.045	1.092	1.141	1.193	1.246	1.302	1.361 CUM
					92/93	93/94	94/95	95/96	96/97	97/98	98/99
07 110 020.5/ 021.2 110331 HB5 I IR FCR 8A	0359M	IN LOS ANGELES TRANSITWAY FROM 30TH STREET TO ADAMS BL (#16) VIADUCT, RETAINING WALLS, REPLACE OCS, WIDEN FWY, MODIFY DRAINS TEC: 30400	1763	3343 R 1580 R 27579 C 28820 C							
D-31 07 110 024.6/ 025.6 11808G HB4C IR FCR 90	0375P	IN LOS ANGELES RTES 5/110 CONNECTORS (LA-5:20.4/21.1) WIDEN CONNECTORS TO 2-LANES AND SB 5-LANES TEC: 14301		234 R R 11287 C C						234 14067	
07 118 R000.0/R011.4 11505G HE13 F LAPC FCR 8A	0655P	NEAR CHATSWORTH AND GRANADA HILLS FROM VENTURA CO LN TO RTE 5 WIDEN MEDIAN TO 8 LANES & ADD HOV LANES STIP AMEND 90-2 TEC: 45889		R R 17481 C (24542)C		19089		(26800)			
07 126 000.0/R005.2 05142G HE13 F LOC IRS 90	0670A	NEAR CASTAIC JUNCTION FROM VENTURA CO LINE TO 0.6 MILES WEST OF ROUTE 5 WIDEN TO 4 LANES TEC: 30284		2837 R R 19728 C (3288)C					2837 23526 (3921)		
07 126 007.9/ 008.4 11674G HE13 F FAU FCR 90	0673N	IN SANTA CLARITA VALENCIA AVE TO BOUQUET CANYON RD WIDEN TO 4 LANES AND REPLACE BRIDGE STIP AMEND 90-2 TEC: 7686	314	395 R 36 45 R 6781 C 7405 (182)C (200)							

1992 ADOPTED
 STATE TRANSPORTATION IMPROVEMENT PROGRAM
 STATE TRANSPORTATION PROJECT COSTS

DATE 04/06/92

\$ IN PARENS ARE NOT SHA OR BOND FUNDS
 TEC=TOTAL ESCALATED COST - ALL CAPITAL
 OUTLAY FUNDS (\$ IN THOUSANDS)

RAMIS - DC
 DIST REVU

D I S T R I C T 0 7
 L O S A N G E L E S

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DIST RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR1	PROJECT DESCRIPTION	PREV PROG CONSTR RW 91/92	COST RW CONSTR 1/92	PROGRAM SCHEDULE							
				4.5% 1.045 92/93	4.5% 1.092 93/94	4.5% 1.141 94/95	4.5% 1.193 95/96	4.5% 1.246 96/97	4.5% 1.302 97/98	4.5% ESC 1.361 CUM 98/99	
07 0747Z 210 RO25.1/ 019590 HE11 IR FAU CITY FCR 8A	IN PASADENA AT FAIROAKS AVE EB ON-RAMP AND WB OFF-RAMP (REPL PLNTG #747Y) PASADENA=50% TEC: 5800	#	R R 2656 C (2656)C		2900 (2900)						
D-53 07 0778 213 HO08.0/HO09.1 155371 HE12 STAM LOCM FAU FCR 8A	IN TORRANCE ON WESTERN AVE, FROM CARSON TO DEL AMO IMPROVE CONVENTIONAL HIGHWAY B92	#	R R 187 (2500)C								
07 0799B 405 000.0/ 007.6 11687G HB4C IR FCR 90	IN LONG BEACH FROM ORANGE COUNTY LINE TO RTE 710 TO EXISTING 8-LANE FREEWAY ADD TWO HOV LANES TEC: 38437		R R 30839 C C				38437			#	
07 0813F 405 013.4/ 015.2 02801G HB311 IR SND 90	NEAR TORRANCE FROM VERMONT TO CRENSHAW SOUNDWALLS:BOTH SIDES (POR) TEC: 3532		R R 2961 C C				3532			#	
07 0817A 405 016.0/ 018.2 49061G HB311 IR SND 92	NEAR LAWDALE FROM YUKON TO INGLEWOOD SOUNDWALLS:BOTH SIDES (POR) STIP AMEND 90-10 RECYCLED 92 PRIO TEC: 5709		R R 4385 C C						5709		

1992 ADOPTED
STATE TRANSPORTATION IMPROVEMENT PROGRAM
STATE TRANSPORTATION PROJECT COSTS

DATE 04/06/92

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OUTLAY FUNDS (\$ IN THOUSANDS)

RAMIS - DC
DIST REVU

D I S T R I C T 0 7
LOS ANGELES

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DIST RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR1	PROJ RTE DESCRIPTION	PREV PROG CONSTR	COST RW ESC CONSTR	PROGRAM SCHEDULE							
				4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC	
07 0883C 605 RO05.0/ O19781 HE14 IR FCR 8A	IN CERRITOS FROM ROUTE 91 TO 0.1 MILE SOUTH OF FAIRTON STREET WIDEN TO 5 LANES/AUXILIARY LANE EACH DIRECTION TEC: 6081		5821 C	92/93	93/94	94/95	95/96	96/97	97/98	98/99	6081 C #
D-35 07 0891 605 RO12.1/RO13.6 O5325K HB311 IR SND 92	NEAR PICO RIVERA FROM WASHINGTON BLVD TO WHITTIER BL SOUNDWALLS:NB TEC: 9252		6798 C								9252 C
07 0898M 605 RO18.8/RO19.4 O2051G HB311 IR SND 92	NEAR CITY OF INDUSTRY FROM 0.6 MILE S/O VALLEY TO VALLEY BLVD SOUNDWALLS:NB TEC: 1579		1160 C								1579 C
07 0203M 710 O18.2/ 10504G HE11 IR CITY FCR 8A	IN SOUTH GATE AT SOUTHERN AVE (NEAR FIRESTONE) CONSTRUCT OFF-RAMP:NB CITY OF SOUTH GATE=50% TEC: 352		147 (147) C					176 (176)			#
07 0213 710 O23.3/ O24.4 O0232G HB311 IR SND 90	IN CITY OF COMMERCE FROM ROUTE 5 TO THIRD STREET SOUNDWALLS:BOTH SIDES TEC: 3421		2998 C			3421					#

1992 ADOPTED
 STATE TRANSPORTATION IMPROVEMENT PROGRAM
 STATE TRANSPORTATION PROJECT COSTS

DATE 04/06/92

\$ IN PARENS ARE NOT SHA OR BOND FUNDS
 TEC=TOTAL ESCALATED COST - ALL CAPITAL
 OUTLAY FUNDS (\$ IN THOUSANDS)

RAMIS - DC
 DIST REVU

D I S T R I C T 0 7
 LOS ANGELES

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DIST RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR1	PROJ RTE LOCATION ID E/A PROG FUND TYPES ELEMENT/YEAR1	PROJECT DESCRIPTION	PREV PROG CONSTR	COST RW ESCAL	PROGRAM SCHEDULE								
					4.5%	4.5%	4.5%	4.5%	4.5%	4.5%	4.5% ESC		
					1.045	1.092	1.141	1.193	1.246	1.302	1.361 CUM		
					RW 91/92	CONSTR 1/92	92/93	93/94	94/95	95/96	96/97	97/98	98/99
07	0219M	NEAR SOUTH PASADENA FROM RTE 10 TO RTE 210		4800 R						4800			
710													
RO26.5/RO32.7													
020090		CONSTRUCT 8-LANE FREEWAY, INCLUDING											
HE 11		2 HOV LANES											
IR		FIXED AMT--UNDFND R/W ONLY											
FCR	90	TEC: 4800											

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APPENDIX E

NATIONAL REGISTER OF HISTORIC PLACES
INDEX OF LISTED PROPERTIES

CALIFORNIA

- Kings County
Kings County Courthouse
114 W. 8th St.
Hanford 9/21/78 78003063
Taoist Temple
No. 12 China Alley
Hanford 6/13/72 72000226
Witt Site
Address Restricted
Kettleman City vicinity 5/06/71 71000141
- Lake County
Anderson Marsh Archeological District
Address Restricted
Lower Lake vicinity 8/24/78 78000676
Archeological Site No. Ca-Lak-711
Address Restricted
Anderson Springs vicinity 5/25/79 79000479
Lake County Courthouse
255 N. Main St.
Lakeport 10/28/70 70000134
Patwin Indian Site
Address Restricted
Clearlake Oaks vicinity 2/23/72 72000227
- Lassen County
Nobles Emigrant Trail
E of Shingletown in Lassen Volcanic National Park
Shingletown vicinity 10/03/75 75000222
Roop's Fort
N. Weatherlow St.
Susanville 5/02/74 74000516
Willow Creek Rim Archeological District
Address Restricted
Litchfield vicinity 12/21/78 78000677
- Los Angeles County
500 Varas Square--Government Reserve
Address Restricted
Los Angeles vicinity 3/12/86 86000326
* Adamson House
23200 W. Pacific Coast Highway
Malibu 10/28/77 77000298

CALIFORNIA

- Los Angeles County
* Adobe Flores
1804 Foothill St.
South Pasadena 6/18/73 73000404
* Al Malaikah Temple
655 W. Jefferson Blvd.
Los Angeles 4/02/87 87000577
* Alvarado Terrace Historic District
Alvarado Terr., Bonnie Brae and 14th Sts.
Los Angeles 5/17/84 84000783
American Trona Corporation Building
Pacific Ave.
Los Angeles 8/30/84 84000785
Angelus Mesa Branch
Los Angeles Branch Library System TR
2700 W. Fifty-second St
Los Angeles 5/19/87 87001005
Antelope Valley Indian Museum
15701 East Ave.
Lancaster 2/26/87 87000509
* Atchison, Topeka, and Santa Fe Railroad Station
110 W. 1st St.
Claremont 7/15/82 82002188
* Auditorium
Torrance High School Campus TR
2200 W. Carson
Torrance 10/13/83 83003499
* Aztec Hotel
311 W. Foothill Blvd.
Monrovia 5/22/78 78000691
* Bailey, Jonathan, House
13421 E. Camilla St.
Whittier 8/29/77 77000304
* Banning House
401 E. M St.
Wilmington 5/06/71 71000180
* Barnsdall Park
4800 Hollywood Blvd.
Los Angeles 5/06/71 71000143
* Batchelder House
626 S. Arroyo Blvd.
Pasadena 12/14/78 78000695
* Battery John Barlow and Saxton
Fort MacArthur
San Pedro 5/04/82 82002200

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Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

* Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
INDEX OF LISTED PROPERTIES**

CALIFORNIA

- Los Angeles County
- * Battery Osgood-Farley
Fort MacArthur Upper Reservation
San Pedro 10/16/74 74000526
 - * Bentz, Louise C., House
657 Prospect Blvd.
Pasadena 12/02/77 77000299
 - * Bernard, Susana Machado, House and Barn
845 S. Lake St.
Los Angeles 9/04/79 79000482
 - * Beverly Wilshire Hotel
9528 Wilshire Blvd.
Beverly Hills 6/12/87 87000908
 - * Blacker, Robert R., House
1177 Hillcrest Ave.
Pasadena 2/06/86 86000147
 - * Bolton Hall
10116 Commerce Ave.
Tujunga 11/23/71 71000159
 - * Bolton, Dr. W. T., House
370 W. Del Mar Blvd.
Pasadena 7/09/80 80004491
 - * Bowen Court
539 E. Villa St.
Pasadena 6/17/82 82002194
 - * Bradbury Building
304 S. Broadway
Los Angeles 7/14/71 71000144
 - * Britt, Eugene W., House
2141 W. Adams Blvd.
Los Angeles 5/17/79 79000483
 - * Broadway Theater and Commercial District
300--849 S. Broadway
Los Angeles 5/09/79 79000484
 - * Bryan Court
Bungalow Courts of Pasadena TR
427 S. Morengo Ave.
Pasadena 4/16/86 86000790
 - * Bryson Apartment Hotel
2701 Wilshire Blvd.
Los Angeles 4/07/83 83001184
 - * Bullock's Wilshire Building
3050 Wilshire Blvd.
Los Angeles 5/25/78 78000685

CALIFORNIA

- Los Angeles County
- * Bunche, Ralph J., House
1221 E. 40th Pl.
Los Angeles 5/22/78 78000686
 - * Cahuenga Branch
Los Angeles Branch Library System TR
4591 W. Santa Monica Blvd.
Los Angeles 5/19/87 87001006
 - * Carroll Avenue, 1300 Block
Carroll Ave. between Edgeware and Douglas Sts.
Los Angeles 4/22/78 76000488
 - * Casa de Parley Johnson
7749 Florence Ave.
Downey 3/20/86 86000449
 - * Catholic-Protestant Chapels, Veterans Administration Center
Eisenhower Ave.
Los Angeles 2/11/72 72000229
 - * Centinela Adobe
7634 Midfield Ave.
Los Angeles 5/02/74 74000522
 - Christmas Tree Lane
Santa Rosa Ave. between Woodbury Ave. and Altadena Dr.
Altadena 9/13/90 90001444
 - * Citizens Publishing Company Building
9355 Culver Blvd.
Culver City 2/12/87 87000082
 - * Civic Center Financial District
E. Colorado Blvd. and Marengo Ave.
Pasadena 10/29/82 82000967
 - * Clarke Estate
10211 Pioneer Blvd.
Santa Fe Springs 1/04/90 89002267
 - * Colonial Court
Bungalow Courts of Pasadena TR
291-301 N. Garfield Ave.
Pasadena 7/11/83 83001185
 - * Colonial House
1416 N. Havenhurst Dr.
Los Angeles 4/15/82 82002190
 - * Colorado Street Bridge
Colorado Blvd.
Pasadena 2/12/81 81000156
 - * Congregation B'nai B'rith
3663 Wilshire Blvd.
Los Angeles 12/21/81 81000154

Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

* Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
INDEX OF LISTED PROPERTIES**

CALIFORNIA

Los Angeles County

- *Heinsbergen Decorating Company Building
7415 Beverly Blvd.
Los Angeles 8/20/84 84000873
- *Highland Park Police Station
6045 York Blvd.
Los Angeles 3/22/84 84000874
- *Highland Park Masonic Temple
104 N. Avenue 58
Los Angeles 1/18/90 89002268
- *Holly Street Livery Stable
110 E. Holly St.
Pasadena 10/25/79 79000491
- *Hollywood Studio Club
1215 Lodi Pl.
Hollywood 11/25/80 80000806
- *Hollywood Masonic Temple
6840 Hollywood Blvd.
Hollywood 2/28/85 85000355
- *Hollywood Boulevard Commercial and Entertainment District
6200-7000 Hollywood Blvd., N. Vine St., N. Highland Ave. and
N. Ivar St.
Los Angeles 4/04/85 85000704
- *Home Economics Building
Torrance High School Campus TR
2200 W. Carson
Torrance 10/13/83 83003536
- *Home Laundry
432 S. Arroyo Pkwy.
Pasadena 6/18/87 87000980
- *Horatio West Court
140 Hollister Ave.
Santa Monica 4/11/77 77000302
- *Hotel Green
99 S. Raymond Ave.
Pasadena 3/23/82 82002196
- *House at 530 S. Marengo Avenue
530 S. Marengo Ave.
Pasadena 9/13/79 79000492
- Hubble, Edwin, House
1340 Woodstock Rd.
San Marino 12/08/76 76000494
- Humaliwo
Address Restricted
Malibu vicinity 9/01/76 76000492

CALIFORNIA

Los Angeles County

- *Irving, Washington, Branch
Los Angeles Branch Library System TR
1803 S. Arlington Ave.
Los Angeles 5/19/87 87001010
- Jackson, Helen Hunt, Branch
Los Angeles Branch Library System TR
2330 Naomi St.
Los Angeles 5/19/87 87001011
- *Jardirette Apartments
5128 Marathon St.
Los Angeles 12/29/86 86003524
- *Jefferson Branch
Los Angeles Branch Library System TR
2211 W. Jefferson Blvd.
Los Angeles 5/19/87 87001012
- *Johnston, Darius David, House
12426 Mapledale St.
Norwalk 11/02/78 78000693
- *Jordan, Orin, House
8310 S. Comstock Ave.
Whittier 7/28/80 80000815
- Keyes Bungalow
1337 E. Boston St.
Altadena 11/14/78 78000678
- LANE VICTORY
Berth 4, Port of San Pedro
San Pedro 12/14/90 90002222
- *La Belle Tour
6200 Franklin Ave.
Hollywood 1/22/88 87002291
- *La Casa Alvarado
1459 Old Settlers Lane
Pomona 4/19/78 78000698
- *La Casa Primera de Rancho San Jose
1569 N. Park Ave.
Pomona 4/03/75 75000436
- *Las Casitas Court
Bungalow Courts of Pasadena TR
656 N. Summit Ave.
Pasadena 7/11/83 83001196
- *Leonis Adobe
23537 Calabasas Rd.
Calabasas 5/29/75 75000433

Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

* Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
INDEX OF LISTED PROPERTIES**

CALIFORNIA

Los Angeles County

- * Lincoln Heights Branch
Los Angeles Branch Library System TR
2530 Workman St.
Los Angeles 5/19/87 87001013
- * Lincoln, Abraham, Elementary School
1200 N. Gordon Ave.
Pomona 8/03/89 89000935
- Little Rock Creek Dam
4.5 mi. S of Pearland off CA 138
Pearland vicinity 4/15/77 77000301
- * Little Tokyo Historic District
301--369 First and 108--120 San Pedro Sts.
Los Angeles 8/22/86 86001479
- Lloyd, Harold, Estate
Address Restricted
Beverly Hills vicinity 2/09/84 84000876
- * Longfellow-Hastings House
85 S. Allen Ave.
Pasadena 3/02/82 82002197
- * Longley, Howard, House
1005 Buena Vista St.
South Pasadena 4/18/74 74000527
- * Lopez Adobe
1100 Pico St.
San Fernando 5/06/71 71000157
- * Los Angeles Central Library
630 W. 5th St.
Los Angeles 12/18/70 70000136
- * Los Angeles Plaza Historic District
Roughly bounded by Spring, Macy, Alameda and Arcadia Sts.,
and Old Sunset Blvd.
Los Angeles 11/03/72 72000231
- Los Angeles Harbor Light Station
Los Angeles Harbor (San Pedro Breakwater)
Los Angeles 10/14/80 80000810
- * Los Angeles Union Passenger Terminal
800 N. Alameda St.
Los Angeles 11/13/80 80000811
- * Los Angeles Pacific Company Ivy Park Substation
9015 Venice Blvd.
Los Angeles 3/25/81 81000155
- * Los Angeles Memorial Coliseum
3911 S. Figueroa St.
Los Angeles 7/27/84 84003886

CALIFORNIA

Los Angeles County

- * Los Cerritos Ranch House
4600 Virginia Rd.
Long Beach 4/15/70 70000135
- * Lovell House
4616 Dundee Dr.
Los Angeles 10/14/71 71000147
- * Lukens, Theodore Parker, House
267 N. El Molino Ave.
Pasadena 3/29/84 84000879
- * Lummis House
200 E. Ave. 43
Los Angeles 5/06/71 71000148
- * Lynwood Pacific Electric Railway Depot
11453 Long Beach Blvd.
Lynwood 9/25/74 74000524
- * Machell--Seaman House
2341 Scarff St.
Los Angeles 6/23/88 88000922
- * Main Building
Torrance High School Campus TR
2200 W. Carson
Torrance 10/13/83 83003538
- * Malabar Branch
Los Angeles Branch Library System TR
2801 Wabash Ave.
Los Angeles 5/19/87 87001014
- * Marengo Gardens
Bungalow Courts of Pasadena TR
982, 986, 990 S. Marengo Ave. and 221-241 Ohio St.
Pasadena 7/11/83 83001197
- * McNally's Windemere Ranch Headquarters
San Esteban and San Cristobal Dr.
La Mirada 7/20/78 78000684
- * Memorial Branch
Los Angeles Branch Library System TR
4645 W. Olympic Blvd.
Los Angeles 5/19/87 87001015
- * Menlo Avenue--West Twenty-ninth Street Historic District
Bounded by Adams Blvd., Ellendale, Thirtieth Ave., and Vermont
Los Angeles 2/12/87 87000139
- * Millard House
645 Prospect Crescent
Pasadena 12/12/78 76000493

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Key:

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* Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
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CALIFORNIA

Los Angeles County

- * Cottage Court
Bungalow Courts of Pasadena TR
642-654 S. Margeno Ave.
Pasadena 7/11/83 83001186
- * Court
Bungalow Courts of Pasadena TR
497-503 1/2 N. Madison Ave.
Pasadena 7/11/83 83001187
- * Court
Bungalow Courts of Pasadena TR
744-756 1/2 S. Marengo Ave.
Pasadena 7/11/83 83001188
- * Court
Bungalow Courts of Pasadena TR
732-744 Santa Barbara St.
Pasadena 7/11/83 83001189
- * Crossroads of the World
6671 Sunset Blvd.
Hollywood 9/08/80 80000805
- * Culberison, Cordelia A., House
1188 Hillcrest Ave.
Pasadena 9/12/85 85002198
- * Cypress Court
Bungalow Courts of Pasadena TR
623-641 N. Madison Ave.
Pasadena 7/11/83 83001190
- * Dana, Richard Henry, Branch
Los Angeles Branch Library System TR
3320 Pepper St.
Los Angeles 5/19/87 87001007
- * De Neve, Felipe, Branch
Los Angeles Branch Library System TR
2820 W. Sixth St.
Los Angeles 5/19/87 87001008
- * Derby, James Daniel, House
2535 E. Chevy Chase Dr.
Glendale 12/14/78 78000682
- * Doheny Estate/Greystone
905 Loma Vista Dr.
Beverly Hills 4/23/76 76000485
- * Dominguez Ranch Adobe
18127 S. Alameda St.
Compton 5/28/76 76000486

CALIFORNIA

Los Angeles County

- * Don Carlos Court
Bungalow Courts of Pasadena TR
374-386 S. Marengo Ave.
Pasadena 7/11/83 83001191
- * Drum Barracks
1053 Carey St.
Wilmington 2/12/71 71000161
- * Eagle Rock Branch Library
Los Angeles Branch Library System TR
2224 Colorado Blvd.
Los Angeles 5/19/87 87001004
- * Edison Historic District
611, 637, and 500 blk. of W. Second St.
Pomona 8/13/86 86001477
- * El Greco Apartment
817 N. Hayworth Ave.
Los Angeles 11/03/88 88002017
- * El Molino Viejo
1120 Old Mill Rd.
Pasadena 5/06/71 71000154
- * Engine Co. No. 27
1355 N. Cahuenga Blvd.
Los Angeles 9/24/85 85002559
- * Engine Company No. 28
644--646 S. Figuara St
Los Angeles 11/16/79 79000485
- * Engine House No. 18
2616 S. Hobart Blvd.
Los Angeles 10/29/82 82000968
- Ennis House
2607 Glendower Ave.
Los Angeles 10/14/71 71000145
- Episcopal Church of the Ascension
25 E. Laurel Ave.
Sierra Madre 8/19/77 77000303
- * Euclid Court
Bungalow Courts of Pasadena TR
545 S. Euclid Ave.
Pasadena 7/11/83 83001193
- * Evanston Inn
385-395 S. Marengo Ave.
Pasadena 9/13/84 84000787

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Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

* Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
INDEX OF LISTED PROPERTIES**

CALIFORNIA

Los Angeles County

- *Exposition Park Rose Garden
Exposition Park, jct. of Exposition Blvd. and Vermont Ave.
Los Angeles 3/28/91 91000285
- *Federal Reserve Bank of San Francisco
409 W. Olympic Blvd.
Los Angeles 9/20/84 84000843
- *Fenyves Estate
470 W. Walnut St. & 160 N. Orange Grove Blvd.
Pasadena 9/05/85 85001983
- Fern Avenue School
1314 Fern Ave.
Torrance 2/20/92 92000067
- *Fire Station No. 23
225 E. 5th St.
Los Angeles 6/09/80 80000809
- *First National Bank of Long Beach
101--125 Pine Ave.
Long Beach 9/13/90 90001432
- *First Trust Building and Garage
587--611 E. Colorado Blvd. and 30-44 N. Madison Ave.
Pasadena 6/12/87 87000941
- *Freeman, Samuel, House
1962 Glencoe Way
Los Angeles 10/14/71 71000146
- *Fremont, John C., Branch
Los Angeles Branch Library System TR
6121 Melrose Ave.
Los Angeles 5/19/87 87001009
- *Friday Morning Club
938-940 S. Figueroa St.
Los Angeles 5/17/84 84000865
- *Friendship Baptist Church
80 W. Dayton St.
Pasadena 11/20/78 78000698
- *Gamble House
4 Westmoreland Pl.
Pasadena 9/03/71 71000155
- Gano, Peter, House
718 Crescent Ave.
Avalon 9/15/83 83001194
- *Garbutt House
1809 Apex Ave.
Los Angeles 7/22/87 87001174

CALIFORNIA

Los Angeles County

- *Garfield Building
403 W. 8th St.
Los Angeles 6/25/82 82002191
- *Garfield House
1001 Buena Vista St.
South Pasadena 4/24/73 73000405
- *Gartz Court
Bungalow Courts of Pasadena TR
270 N. Madison
Pasadena 8/25/83 83001195
- Glendora Bougainvillea
Bennett and Minnesota Aves.
Glendora 2/07/78 78000683
- *Golden Gate Theater
5170-5188 E. Whittier Blvd.
Los Angeles 2/23/82 82002192
- *Granada Shoppes and Studios
672 S. Lafayette Park Pl.
Los Angeles 11/20/86 86003320
- *Greenwood, Barbara, Kindergarten
Hacienda Pl. and McKinley Ave.
Pomona 9/18/78 78000697
- *Guaranty Building
6331 Hollywood Blvd
Hollywood 9/04/79 79000481
- *HUGHES FLYING BOAT (HERCULES)
Berth 121, Pier E, Port of Long Beach
Long Beach 11/26/80 80004493
- *Hacienda Arms Apartments
8439 Sunset Blvd.
Los Angeles 12/15/83 83003531
- *Hale House
Heritage Sq., 3800 N. Homer St., Highland Park
Los Angeles 9/22/72 72000230
- *Hale Solar Laboratory
740 Holladay Rd.
Pasadena 1/23/86 86000103
- *Haskett Court
824--834 E. California Blvd.
Pasadena 2/25/82 82002195
- Hawkins--Nimocks Estate--Patricio Ontiveros Adobe
12100 Telegraph Rd.
Santa Fe Springs 12/31/87 82004982

E4

Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

*Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
INDEX OF LISTED PROPERTIES**

CALIFORNIA

- Los Angeles County
 *Miller and Herrlott House
 1163 W. 27th St.
 Los Angeles 11/16/79 79000486
 *Million Dollar Theater
 307 S. Broadway
 Los Angeles 7/20/78 78000687
 *Millmore House
 1301 S. Chelton Way
 South Pasadena 3/24/72 72000235
 *Mission Court
 Bungalow Courts of Pasadena TR
 587 N. Oakland Ave.
 Pasadena 7/11/83 83001198
 *Mission San Fernando Rey de Convento Building
 15151 San Fernando Mission Blvd.
 Los Angeles 10/27/88 88002147
 *Moneta Branch
 Los Angeles Branch Library System TR
 4255 S. Olive St.
 Los Angeles 5/19/87 87001016
 *Montecito Apartments
 6650 Franklin Ave.
 Los Angeles 7/18/85 85001592
 *Moore, Frederick Mitchell, House
 818 S. Bonnie Brae St.
 Los Angeles 6/03/76 76000489
 *Mounj Pleasant House
 Heritage Sq., 3800 Homer St.
 Los Angeles 12/12/78 76000490
 *Muir, John, Branch
 Los Angeles Branch Library System TR
 1005 W. Sixty-fourth St.
 Los Angeles 5/19/87 87001017
 *National Bank of Whittier Building
 13002 E. Philadelphia St.
 Whittier 12/30/82 82000969
 *Natural History Museum
 900 Exposition Blvd.
 Los Angeles 3/04/75 75000434
 *Newcomb House
 675--677 N. El Molino Ave.
 Pasadena 9/02/82 82002198

CALIFORNIA

- Los Angeles County
 *Nicholson, Grace, Building
 46 N. Los Robles Ave.
 Pasadena 7/21/77 77000300
 *North Hollywood Branch
 Los Angeles Branch Library System TR
 5211 N. Tujunga Ave.
 Los Angeles 5/19/87 87001018
 *Oaklawn Bridge and Waiting Station
 Between Oaklawn and Fair Oaks Aves.
 South Pasadena 7/16/73 73000408
 *Oaks, The
 250 N. Primrose Ave.
 Monrovia 4/06/78 78000692
 *Odd Fellows Temple
 175 N. Los Robles Ave.
 Pasadena 8/01/85 85001682
 *Old Pasadena Historic District
 Roughly bounded by Pasadena, Fair Oaks, Raymond Aves., Arroyo Pkwy., Del Mar Blvd., and Corson St.
 Pasadena 9/15/83 83001200
 Old Santa Susana Stage Road
 Address Restricted
 Chatsworth vicinity 1/10/74 74000517
 *Orange Grove Court
 Bungalow Courts of Pasadena TR
 745 E. Orange Grove Blvd.
 Pasadena 7/11/83 83001199
 *Oviatt, James, Building
 617 S. Olive St.
 Los Angeles 8/11/83 83004529
 Pacific Electric Railway Company Substation No. 8
 2245 N. Lake Ave.
 Altadena 11/09/77 77000295
 *Pacific Electric Railroad Bridge
 Torrance Blvd. and Bow St.
 Torrance 7/13/89 89000854
 *Paddison Ranch Buildings
 11951 Imperial Hwy.
 Norwalk 6/23/78 78000694
 Palmer, Minnie Hill, House
 Chatsworth Park South
 Chatsworth 9/04/79 79000480

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Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

* Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
INDEX OF LISTED PROPERTIES**

CALIFORNIA

Los Angeles County

- *Palmetto Court
Bungalow Courts of Pasadena TR
100 Palmetto Dr.
Pasadena 7/11/83 83001201
- *Palomares, Ygnacio, Adobe
Corner of Arrow Hwy. and Orange Grove Ave.
Pomona 3/24/71 71000156
- *Parkhurst Building
185 Pier Ave.
Santa Monica 11/17/78 78000699
- *Pasadena Civic Center District
Roughly bounded by Walnut and Green Sts.,
Raymond and Euclid Aves.
Pasadena 7/28/80 80000813
- *Pasadena Playhouse
39 S. El Molino Ave.
Pasadena 11/11/75 75000435
- *Patio del Moro
8225--8237 Fountain Ave.
West Hollywood 9/11/86 86002418
- *Pegler, John Carlton, House
419 E. Highland Ave.
Sierra Madre 10/20/88 88002019
- *Pellissier Building
3780 Wilshire Blvd.
Los Angeles 2/23/79 79000488
- *Phillips Mansion
2640 W. Pomona Blvd.
Pomona 11/06/74 74000525
- *Pico, Pio, Casa
6003 Pioneer Blvd.
Whittier 6/19/73 73000408
- *Pico, Romulo, Adobe
10940 Sepulveda Blvd.
Mission Hills 11/13/66 86000211
- *Pitzer House
4353 N. Towne
Claremont 9/04/86 86002192
- *Plaza Substation
10 Olivera St.
Los Angeles 9/13/78 78000689
- Point Fermin Lighthouse
805 Paseo Del Mar
San Pedro 6/13/72 72000234

CALIFORNIA

Los Angeles County

- Point Vicente Light
Rancho Palos Verdes
Long Beach 10/31/80 80000808
- Pomona Fox Theater
102--144 3rd St.
Pomona 2/19/82 82002201
- *Pomona YMCA Building
350 N. Geary Ave.
Pomona 3/06/86 86000408
- *Prospect Historic District
Prospect Blvd., Square, Crescent, and Terrace, Rosemont Ave.,
Armada and Fremont Drs., and La Mesa Pl.
Pasadena 4/07/83 83001202
- Puvunga Indian Village Sites
Address Restricted
Long Beach vicinity 1/21/74 74000521
- Puvunga Indian Village Sites (Boundary Increase)
Address Restricted
Long Beach 5/22/82 82000429
- *Queen Anne Cottage and Coach Barn
301 N. Baldwin Ave.
Arcadia 10/31/80 80000804
- RALPH J. SCOTT
Berth 85
San Pedro 6/30/89 89001430
- *Ramsay--Durfee Estate
2425 S. Western Ave.
Los Angeles 7/24/89 89000821
- *Rancho El Encino
16756 Moorpark St.
Encino 2/24/71 71000142
- *Rancho Los Alamitos
6400 Bixby Hill Rd.
Long Beach 7/07/81 81000153
- *Redondo Beach Public Library
309 Esplanade St.
Redondo Beach 3/12/81 81000158
- *Redondo Beach Original Townsite Historic District
N. Gertruda Ave., Carnelian St., N. Guadalupe Ave. and Diamo
nd St.
Redondo Beach 6/30/88 88000970
- Reeve, Jennie A., House
4260 Country Club Dr.
Long Beach 6/21/84 84000883

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Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

* Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
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CALIFORNIA

Los Angeles County

- *Rialto Theatre
1019--1023 Fair Oaks Ave.
South Pasadena 5/24/78 78000700
- Rindge, Frederick Hastings, House
2263 Harvard Blvd.
Los Angeles 1/23/86 86000105
- *Rives, James C., House
10921 S. Paramount Blvd.
Downey 5/22/78 78000681
- Robinson, Virginia, Estate
1008 Elden Way
Beverly Hills 11/15/78 78000679
- Rogers, Will, House
14253 Sunset Blvd.
Los Angeles 2/24/71 71000149
- *Ronda
1400--1414 Havenhurst Dr.
West Hollywood 2/28/85 85000356
- *Rose Bowl, The
991 Rosemont Ave., Brookside Park
Pasadena 2/27/87 87000755
- *Rose Court
Bungalow Courts of Pasadena TR
449-457 S. Hudson Ave.
Pasadena 7/11/83 83001203
- *Rowland, John A., House
16021 E. Gale Ave.
Industry 7/16/73 73000403
- *Russian Village District
290--370 S. Mills Ave. and 480 Cucamonga Ave.
Claremont 12/28/78 78000680
- S. S. CATALINA
Berth 96, Los Angeles Harbor
San Pedro 9/01/78 78000495
- Saddle Rock Ranch Pictograph Site
Address Restricted
Malibu vicinity 2/12/82 82004617
- *San Dimas Hotel
121 San Dimas Ave.
San Dimas 3/16/72 72000233
- *San Fernando Building, The
400--410 S. Main St.
Los Angeles 7/31/86 86002098

CALIFORNIA

Los Angeles County

- San Gabriel Mission
Junipero St. and W. Mission Dr.
San Gabriel 5/06/71 71000158
- *San Rafael Rancho
Bonita Dr.
Glendale 12/12/76 76000487
- *Santa Monica Loeff Hippodrome
276 Santa Monica Pier
Santa Monica 2/27/87 87000766
- *Sara-Thel Court
Bungalow Courts of Pasadena TR
618-630 S. Marengo Ave.
Pasadena 7/11/83 83001182
- *Schindler, R.M. House
833 N. Kings Rd.
Los Angeles 7/14/71 71000150
- *Scripps College for Women
Columbia and 10th St.
Claremont 9/20/84 84000887
- *Second Church of Christ, Scientist
946 W. Adams Blvd.
Los Angeles 4/02/87 87000576
- *Security Trust and Savings
6381-85 Hollywood Blvd.
Hollywood 8/18/83 83001204
- *Sinclair, Upton, House
464 N. Myrtle Ave.
Monrovia 11/11/71 71000153
- *Singer Building
18 S. Oakland Ave. and 520 E. Colorado Blvd.
Pasadena 5/16/85 85001068
- *Smith Estate
5905 El Mio Dr.
Los Angeles 10/29/82 82000971
- *Smith, Ernest W., House
272 S. Los Robles Ave.
Pasadena 1/14/88 87002397
- *Somerville Hotel
4225 S. Central Ave.
Los Angeles 1/17/76 76000491
- *South Bonnie Brae Tract Historic District
1026--1053 S. Bonnie Brae St. and 1830--1851 W. Eleventh St.
Los Angeles 1/14/88 87002401

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Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

* Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
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CALIFORNIA

Los Angeles County

- *South Marengo Historic District
S. Marengo Ave.
Pasadena 5/02/82 82002199
- *South Pasadena Historic District
Roughly bounded by Mission and El Centro Sts., and Fairview
and Meridian Aves.
South Pasadena 7/21/82 82002202
- *South Serrano Avenue Historic District
400 blk. of S. Serrano Ave.
Los Angeles 1/28/88 87002407
- *Southern Pacific Railroad Station
11825 Bailey St.
Whittier 5/22/78 78000701
- *Sowden, John, House
5121 Franklin Ave.
Los Angeles 7/14/71 71000151
- Space Flight Operations Facility
Jet Propulsion Laboratory
Pasadena 10/03/85 85002814
- *Spring Street Financial District
354--704 S. Spring St.
Los Angeles 8/10/79 79000489
- *St. James Park Historic District
Roughly bounded by 21st and 23 Sts., Mount St. Mary's Colleg
e, W. Adams Blvd. and Union Ave.
Los Angeles 9/27/91 91001387
- *Standard Oil Building
7257 Bright Ave.
Whittier 6/09/80 80000816
- *Stevenson, Robert Louis, Branch
Los Angeles Branch Library System TR
803 Spence St.
Los Angeles 5/19/87 87001021
- *Stimson House
2421 S. Figueroa St.
Los Angeles 3/30/78 78000690
- *Storer House
8161 Hollywood Blvd.
Los Angeles 9/28/71 71000152
- *Stoutenburgh House
255 S. Marengo Ave.
Pasadena 11/25/80 80000814

CALIFORNIA

Los Angeles County

- *Streetcar Depot
Pershing and Dewey Aves.
Los Angeles 2/23/72 72000232
- *Sunset Towers
8358 Sunset Blvd.
Los Angeles 5/30/80 80000812
- *Sweetser Residence
417 E. Beryl St.
Redondo Beach 9/05/85 85001984
- *Temple Mansion
15415 E. Don Julian Rd.
Industry 12/02/74 74000518
- *Title Guarantee and Trust Company Building
401-411 W. 5th St.
Los Angeles 7/26/84 84000891
- *Toberman, C. E., Estate
1847 Camino Palmero
Hollywood 9/15/83 83001205
- *Torrance School
Torrance High School Campus TR
2200 W. Carson
Torrance 10/13/83 83003542
- Tuna Club of Avalon
100 St. Catherine Way, Catalina Island
Avalon 4/02/91 91000338
- *Twentieth Street Historic District
912--950 20th St. (even numbers)
Los Angeles 7/22/91 91000915
- *Twenty-Five Foot Space Simulator
Jet Propulsion Laboratory
Pasadena 10/03/85 85002812
- *US Post Office--Beverly Hills Main
US Post Office in California 1900-1941 TR
469 N. Crescent Dr.
Beverly Hills 1/11/85 85000128
- *US Post Office--Burbank Downtown Station
US Post Office in California 1900-1941 TR
125 E. Olive Ave.
Burbank 1/11/85 85000127
- *US Post Office--Glendale Main
US Post Office in California 1900-1941 TR
313 E. Broadway St.
Glendale 1/11/85 85000128

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*Historic Places Within 1 Mile of the CMP Roadway System.

**NATIONAL REGISTER OF HISTORIC PLACES
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CALIFORNIA

Los Angeles County

- *US Post Office--Long Beach Main
US Post Office in California 1900-1941 TR
300 Long Beach Blvd.
Long Beach 1/11/85 85000129
- *US Post Office--Hollywood Station
US Post Office in California 1900-1941 TR
1615 N. Wilcox Ave.
Los Angeles 1/11/85 85000130
- *US Post Office--Los Angeles Terminal Annex
US Post Office in California 1900-1941 TR
900 Alameda St.
Los Angeles 1/11/85 85000131
- *US Post Office--San Pedro Main
US Post Office in California 1900-1941 TR
839 S. Beacon St.
San Pedro 1/11/85 85000132
- *Van Buren Place Historic District
2620--2657 Van Buren Pl.
Los Angeles 8/10/89 89001103
- Van Nuys Branch
Los Angeles Branch Library System TR
14553 Sylvan Way
Los Angeles 5/19/87 87001019
- *Vasquez Rocks
Agua Dulce Rd.
Agua Dulce 8/22/72 72000228
- *Venice Branch
Los Angeles Branch Library System TR
610 California Ave.
Los Angeles 5/19/87 87001020
- *Venice Canal Historic District
Roughly bounded by Grand, Carroll, Eastern,
and Sherman canals
Los Angeles 8/30/82 82002193
- *Vermont Square Branch
Los Angeles Branch Library System TR
1201 W. Forty-eighth St.
Los Angeles 5/19/87 87001022
- *Villa Bonita
1817 Hillcrest Rd.
Hollywood 9/12/86 86001950
- Villa Francesca
1 Peppertree Dr.
Rancho Palos Verdes 10/02/86 86002796

CALIFORNIA

Los Angeles County

- *Villa Verde
800 S. San Rafael
Pasadena 9/13/84 84000896
- *Vista del Arroyo Hotel and Bungalows
125 S. Grand Ave.
Pasadena 4/02/81 81000157
- *Washington Building
9720--9732 Washington Blvd.
Culver City 5/28/91 91000635
- *Watts Station
1686 E. 103rd St.
Los Angeles 3/15/74 74000523
- *Watts Towers of Simon Rodia
1765 E. 107th St.
Los Angeles 4/13/77 77000297
- *Weaver, Henry, House
142 Adelaide Dr.
Santa Monica 12/27/89 89002114
- Well No. 4, Pico Canyon Oil Field
9.5 mi. N of San Fernando, W of U.S. 99
San Fernando vicinity 11/13/66 66000212
- *Whitley Heights Historic District
Roughly bounded by Franklin, Highland, Cahuenga, and Fairfile
Aves.
Hollywood 8/19/82 82002189
- *Wilmington Branch
Los Angeles Branch Library System TR
309 W. Opp St.
Los Angeles 5/19/87 87001023
- *Wilshire Branch
Los Angeles Branch Library System TR
149 N. Saint Andrews Pl.
Los Angeles 5/19/87 87001024
- Wilson, Warren, Beach House
15 Thirtieth St.
Venice 7/17/86 86001666
- *Wilton Historic District
S. Wilton Pl., S. Wilton Dr., and Ridgewood Pl.
Los Angeles 7/24/79 79000490
- *Woman's Club of Redondo Beach
400 S. Broadway
Redondo Beach 4/19/84 84000900

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* Historic Places Within 1 Mile of the CMP Roadway System.

NATIONAL REGISTER OF HISTORIC PLACES
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CALIFORNIA

Los Angeles County

- *Workman Adobe
15415 Don Julian Rd.
Industry 11/20/74 74000519
- *Workman Family Cemetery
15415 E. Don Julian Rd.
Industry 11/20/74 74000520
- *Wright, Lloyd, Home and Studio
858 N. Doheny Dr.
West Hollywood 4/06/87 87000562
- Wrigley, William, Jr., Summer Cottage
76 Wrigley Rd.
Avalon 8/15/85 85001785
- *Wynate
851 Lyndon St.
South Pasadena 4/24/73 73000407

Madera County

- Madera County Courthouse
210 W. Yosemite Ave.
Madera 9/03/71 71000162

Marin County

- Alexander-Acacia Bridge
Alexander Ave. between Acacia and Monte Vista Aves.
Larkspur 1/05/84 84000903
- ✓Angel Island
SE of Tiburon in San Francisco Bay
Tiburon vicinity 10/14/71 71000184
- Barrett, William G., House
156 Bulkley
Sausalito 6/17/80 80004490
- Boyd House
1125 B St.
San Rafael 12/17/74 74000528
- ✓Bradford House
333 G St.
San Rafael 6/06/80 80000818
- China Camp
247 N. San Pedro Dr.
San Rafael 4/26/79 79000493
- ✓Dixie Schoolhouse
2255 Las Gallinas Ave.
San Rafael 12/26/72 72000236

Key:

Property Name, Address/Boundary, City, Vicinity, Listed Dates, Reference Number, Multiple Name.

* Historic Places Within 1 Mile of the CMP Roadway System.

APPENDIX E

CULTURAL HERITAGE COMMISSION
HISTORIC-CULTURAL MONUMENTS
1 THROUGH 562
LISTED BY ADDRESS

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
1880 N.	Academy Dr.	Los Angeles Police Academy Rock Garden, Waterfalls, Pool and Clubhouse with the adjacent landscaped areas developed in the ravine behind the major L.A. Police Academy Facilities in Elysian Park	110	1	January 17, 1973
514 W.	Adams Bl.	St. John's Episcopal Church, (Excluding Social Hall) Lot 2, Tract 8141	516	9	January 22, 1991
621 W.	Adams Bl.	St. Vincent De Paul Church	90	9	July 21, 1971
650 W.	Adams Bl.	Auto Club of Southern California [Primary Address: 2601 S. Figueroa St.]	72	8	February 3, 1971
839 W.	Adams Bl.	Stimson, Ezra T., House	456	1	October 24, 1989
930 - 948 W.	Adams Bl.	Second Church of Christ Scientist of L.A.	57	8	July 17, 1968
954 - 1008 W.	Adams Bl.	Sunshine Mission [Primary Address: 2600 S. Hoover St.]	241	8	April 9, 1981
1140 - 1156 W.	Adams Bl.	Kelly, A. E. Residence	295	8	July 12, 1985
1158 - 1176 W.	Adams Bl.	Residences	297	8	August 13, 1985
1180 - 1190 W.	Adams Bl.	Ecung-Ibbetson House & Moreton Bay Fig Tree [Alternate Address: 2612 Magnolia Ave.]	350	8	March 29, 1988
1439 - 1457 W.	Adams Bl.	First African Methodist Episcopal Zion Cathedral & Community Center	341	8	January 22, 1988
2141 W.	Adams Bl.	Mansion and Formal Gardens [Alternate Address: 2528 Gramercy Pl.]	197	10	August 23, 1978
2146 W.	Adams Bl.	Wells-Halliday Mansion (It is not Council's intention to prohibit construction of building at rear of house or access thereto, as long as proper procedures are met.)	458	10	November 3, 1989
2153 - 2215 W.	Adams Bl.	William Andrews Clark Memorial Library [Primary Address: 2500 - 2520 Cimarron St.]	28	10	October 9, 1964
3115 - 3125 W.	Adams Bl.	Fitzgerald House [Alternate Address: 2525 Arlington Ave.]	258	10	November 5, 1982
3300 W.	Adams Bl.	Walker Mansion Building & Front Section of Grounds Only	419	10	March 3, 1989
3424 W.	Adams Bl.	Lindsay, Lycurgus Mansion (Polish Parish) — Mansion, Carriage House, & Grounds (excluding existing church building and covered walkway in front of the building and all buildings and property to the rear of the carriage house)	496	10	May 30, 1990
3500 W.	Adams Bl.	Guasti Villa/Busby Berkeley Estate Garage, & Grounds (excluding the recent additions as specified on attached site)	478	10	January 30, 1990
3722 - 3726 W.	Adams Bl.	Dr. Grandville MacGowan Home	479	10	January 30, 1990
3734 W.	Adams Bl.	Briggs Residence	477	10	January 30, 1990

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
4976 - 4990 W.	Adams Bl.	Church Of The Advent [Alternate Address: 2614 Longwood Dr.]	512	10	January 16, 1991
2373	Addison Way	Swanson House	542	14	July 2, 1991
6141	Afton Pl.	Afton Arms Apartments	463	13	November 3, 1989
611	Agatha St.	Cast Iron Commercial Building [Primary Address: 740 - 748 S. San Pedro St.]	140	9	March 19, 1975
	Alameda St.	Plaza Park [Primary Address: Sunset Bl. & Plaza]	64	9	April 1, 1970
* 800 - 850 N.	Alameda St.	Union Station and Grounds [Alternate Address: 357 Aliso St.]	101	14	August 22, 1972
1801 - 1813	Albion St.	Albion Cottages & Milagro Market	442	1	June 20, 1989
357	Aliso St.	Union Station & Grounds [Primary Address: 800 - 850 N. Alameda St.]	101	14	August 22, 1972
6814 - 6836	Alta Loma Terrace	Highland-Camrose Bungalow Village [Primary Address: 2101 - 2131 N. Highland Ave.]	291	13	April 23, 1985
179 - 181 S.	Alta Vista St.	Morgan, Octavius Residence	444	5	June 20, 1989
601 - 631 S.	Alvarado St.	MacArthur Park [Primary Address: 2100 - 2320 W. 6th St.]	100	4	May 1, 1972
636 1/2	Alvarado St.	Westlake Theatre Building	546	1	September 24, 1991
1135 - 1141 S.	Alvarado St.	Potter, Thomas Residence	327	1	September 22, 1987
1147 S.	Alvarado St.	Winstel, August Residence	328	1	September 22, 1987
1366 S.	Alvarado St.	Central Spanish 7th Day Adventist Church [Alternate Address: 1447 - 1459 Alvarado Terr.]	89	1	July 7, 1971
1311 - 1321	Alvarado Terrace	Boyle-Barmore Residence	83	1	July 7, 1971
1325	Alvarado Terrace	Cohn Residence	84	1	July 7, 1971
1333	Alvarado Terrace	Gilbert Residence	85	1	July 7, 1971
1345	Alvarado Terrace	Powers Residence	86	1	July 7, 1971
1353	Alvarado Terrace	Raphael Residence	87	1	July 7, 1971
1401	Alvarado Terrace	Kenny-Everhardy House	88	1	July 7, 1971
1447 - 1459	Alvarado Terrace	Central Spanish 7th Day Adventist Church [Primary Address: 1366 S. Alvarado St.]	89	1	July 7, 1971
1040	Angelo Dr.	Greenacres (Former Harold Lloyd Estate) [Alternate Address: 1740 Green Acres Pl.]	279	5	July 24, 1984
15301 - 15327	Antioch St.	Pacific Palisades Business Block [Primary Address: 15300 - 15318 Sunset Bl.]	276	11	April 24, 1984
	Arcadia	Plaza Park [Primary Address: Sunset Bl. & Plaza]	64	9	April 1, 1970
1709 - 1715	Argyle Terrace	Pantages Theater [Primary Address: 6225 - 6249 Hollywood Bl.]	193	13	July 5, 1978
1130	Arlington Ave.	Milbank/McFie Estate [Alternate Address: 3340 Country Club Dr.]	420	10	December 13, 1988
2525	Arlington Ave.	Fitzgerald House [Primary Address: 3115 - 3125 Adams Bl.]	258	10	November 5, 1988
1803 S.	Arlington Ave.	Washington-Irving Branch Library [Alternate Address: 2508 W. 18th St.]	307	10	June 27, 1986
6201 - 6211	Arroyo Glen	San Encino Abbey [Alternate Address: 6204 Marmion Way]	106	14	November 15, 197
5676 - 5688	Ash St.	Wheeler-Smith House	378	1	July 15, 1988
221 - 227 N.	Avalon Bl.	Masonic Temple	342	15	January 22, 1988
650 S.	Avenue 21	Edison Electric Company Los Angeles #3 Steam Power Plant	388	14	October 21, 1988
201 - 231 E.	Avenue 42	Lummi, Charles Residence and Surrounding Gardens (El Alisal) [Primary Address: 200 - 212 E. Avenue 43]	68	1	September 2, 197

* Indicates Monument Near the CMP System.

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
315 W.	Avenue 43	Wachtel Studio-Home & Eucalyptus Grove (Excluding the Garage)	503	14	October 9, 1990
200 - 212 E.	Avenue 43	Lummis, Charles Residence and Surrounding Gardens (El Alisal) [Alternate Addresses: 201 - 231 E. Avenue 42, and 4201 - 4231 Carlota Blvd.]	68	1	September 2, 1970
200 - 202	Avenue 43	Mount Washington Cable Car Station	269	14	June 28, 1983
161 - 169 S.	Avenue 49	Bent, Arthur S. House	482	1	March 23, 1990
211 S.	Avenue 52	Maxwell, J.E. Residence	539	1	July 19, 1991
215 S.	Avenue 52	Reverend Williel Thomson Residence	541	1	July 19, 1991
215 N.	Avenue 53	Morrell House	379	1	July 15, 1988
219 N.	Avenue 53	Reeves House	380	1	July 15, 1988
326 N.	Avenue 53	Piper House	540	1	July 19, 1991
369 N.	Avenue 53	La Paloma Residence	554	1	March 18, 1992
104 - 112 N.	Avenue 56	Masonic Temple (Highland Park) [Alternate Address: 5567 N. Figueroa St.]	282	1	August 29, 1984
148 - 150 S.	Avenue 56	A.J. Madison House	550	1	October 2, 1991
212 - 214 N.	Avenue 57	Charley and Nettie Williams Home	556	1	April 28, 1992
125 - 135 S.	Avenue 57	Highland Park Ebell Club	284	1	August 29, 1984
140 - 142 S.	Avenue 57	Smith, William U. House & Arroyo Stone Wall	376	14	July 15, 1988
137 - 151 S.	Avenue 57	Latter House & Arroyo Stone Wall	366	14	June 21, 1988
179 - 199 S.	Avenue 57	Ollie Tract (Excluding Lot 7) and Environs, Including Structure on 199 S. Avenue 57 (Excluding Structure on 5727 Benner St.) [Alternate Address: 5701 - 5731 Benner St.]	377	14	July 15, 1988
140 - 154 S.	Avenue 59	Yoakum House	287	14	January 18, 1985
210 - 220 S.	Avenue 60	Drake House	338	14	January 26, 1988
225 N.	Avenue 61	Department of Water and Power Distributing Station No. 2 [Alternate Address: 6112 Monte Vista Street]	558	1	April 21, 1992
162 S.	Avenue 61	Santa Fe Arroyo Seco Railroad Bridge	339	14	January 22, 1988
420 N.	Avenue 62	Garvanza Pumping Station & Site of the Highland Reservoir	412	14	January 20, 1989
200 - 204 S.	Avenue 66	Judson Studios	62	14	August 13, 1969
432 - 498 N.	Avenue 66	Residence (aka McClure Residence)	107	1	November 15, 1972
616 N.	Avenue 66	Wilson, George W. Estate (Burned down 12/15/1989)	418	14	February 17, 1989
740 - 742 N.	Avenue 66	Ashley House	402	14	December 9, 1988
840 N.	Avenue 66	Williams, Robert Edmund House, (Excluding Adjacent Grounds) AKA The Hathaway Home for Children	411	14	January 18, 1989
4400	Avocado St.	Avocado Trees (Entire Block)	343	4	January 22, 1988
2801	Baldwin	Sacred Heart Church [Primary Address: 2210 - 2212 Sichel St.]	468	1	December 5, 1989
110 S.	Barrington Beachwood	Gas Station (Brentwood Village)	387	11	September 2, 1988
		Two Stone Gates (Intersection of Westshire and Beldon) [Alternate Addresses: Westshire Dr., Beldon]	20	13	May 24, 1963
907 - 945	Beacon St.	Harbor View House (San Pedro) [Alternate Address: 912 - 928 Palos Verdes St.]	252	15	August 25, 1982
1542	Beacon St. Beldon	Residence (Relocated from 575 19th St.)	253	15	August 25, 1982
		Two Stone Gates [Primary Address: Beachwood]	20	13	May 24, 1963

Address	Monument Name	Monument Number	Council District	Date Of Inclusion	
1222 - 1234	Bellevue Ave.	Bob's Market	215	1	June 6, 1979
5701 - 5731	Benner St.	Ollie Tract [Primary Address: 179 - 199 S. Avenue 57] (The Structure on Benner St. is excluded from the C. H. C. Designation)	377	14	July 15, 1988
4115	Bernice Pl.	Montecito View House	529	1	April 23, 1991
4350 - 4352½	Beverly Bl.	Petersen, Einar C. Residence	552	4	November 13, 1991
7415 - 7427	Beverly Bl.	Heinsbergen Building	275	5	January 17, 1984
7600	Beverly Bl.	Pan Pacific Auditorium (West Facade) (Burned Down on 6/89)	183	4	March 1, 1978
	Bienvenede Ave.	Sycamore Trees (South of Sunset Bl. to The Cul-de-Sac)	465	11	October 27, 1989
1253	Bishops Road	Cathedral High (Street Name Change From Stadium Way)	281	1	August 7, 1984
5423	Black Oak Dr.	Taggart House [Primary Address: 2150 - 2158 Live Oak Dr.]	521	13	March 15, 1991
4020 - 4026	Bluff Pl.	Wilbur F. Wood House (site only, excluding all improvements)	557	15	April 28, 1992
403 S.	Bonnie Brae St.	Grier-Musser House	333	1	December 18, 1987
818 - 822 S.	Bonnie Brae St.	Residence (aka Moors, Frederick Residence)	45	1	February 8, 1967
824 - 826 S.	Bonnie Brae St.	Boothe, Charles B. Residence and Carriage House (Excluding Non-Historic Interior Alterations)	491	1	July 30, 1990
1036 - 1038 S.	Bonnie Brae St.	Residence	99	1	April 5, 1972
1047 S.	Bonnie Brae St.	Forget, Alphonse J. Residence	433	1	May 5, 1989
1970	Bonsallo Ave.	Shannon, Michael Residence	501	1	June 12, 1990
1982	Bonsallo Ave.	Heimgartner, Agnes B. Residence	499	1	June 12, 1990
2121 - 2123	Bonsallo Ave.	Wright House, The	560	1	May 26, 1992
2122	Bonsallo Ave.	Kane, John B. Residence	500	1	June 12, 1990
2124	Bonsallo Ave.	Gibbons, Charles Clifford House	497	1	June 12, 1990
2125	Bonsallo Ave.	Allen House, The	561	1	May 26, 1992
1239 - 1247	Boston St.	Residence	219	15	May 16, 1979
241 - 247 N.	Breed St.	Congregation Talmud Torah	359	14	June 7, 1988
249 - 259 S.	Broadway	Irvine/Byrne Building	544	9	August 2, 1991
300 - 310 S.	Broadway	Bradbury Building [Alternate Address: 216 - 224 W. 3rd St.]	6	9	September 21, 1962
512 - 524 S.	Broadway	Roxie Theater	526	9	March 20, 1991
526 - 530 S.	Broadway	Cameo Theater (formerly Clune's Broadway)	524	9	March 20, 1991
532 - 536 S.	Broadway	Arcade Theater	525	9	March 20, 1991
609 - 619 S.	Broadway	Los Angeles Theater	225	9	August 15, 1979
630 S.	Broadway	Palace Theater	449	9	August 16, 1989
701 - 713 S.	Broadway	State Theater Building [Alternate Address: 300 - 314 W. 7th St.]	522	9	March 20, 1991
800 S.	Broadway	Tower Theater [Alternate Address: 218 - 230 W. 8th St.]	450	9	August 16, 1989
801 - 829 S.	Broadway	Hamburger's Department Store (May Company - Downtown) [Alternate Addresses: 300 - 332 W. 8th St., 810 S. Hill St.]	459	9	October 17, 1989
808 - 812 S.	Broadway	Rialto Theatre Building Marquee, Box Office & Original Marble Entry Floor Only	472	9	December 20, 1989
843 - 855 S.	Broadway	Eastern-Columbia Building [Alternate Address: 211 W. 9th St.]	294	9	April 17, 1985
927 - 939 S.	Broadway	United Artists Theater Building	523	9	March 20, 1991

Address	Monument Name	Monument Number	Council District	Date Of Inclusion
1111 - 1131 S. Broadway	Herald Examiner Building [Alternate Address: 146 W. 11th St.]	178	9	August 17, 1977
2201 N. Broadway	Federal Bank Building	396	1	November 23, 1988
3110 N. Broadway	Residence	157	1	July 7, 1976
1424 - 1456 Bronson Ave.	Site of Filming of First Talking Film [Primary Address: 5800 - 5858 Sunset Bl.]	180	13	September 21, 1977
926 - 950 Broxton Ave.	Fox Bruin Theater [Alternate Address: 10935 - 10943 Weyburn Ave.]	361	5	June 21, 1988
949 - 961 Broxton Ave.	Fox Village Theater [Alternate Address: 10953 - 10961 Weyburn Ave.]	362	5	June 21, 1988
1072 - 1080 Broxton Ave.	Janss Investment Company Building [Primary Address: 1045 - 1099 Westwood Bl.]	364	5	June 21, 1988
Bruno St.	Granite-Block Paving (Between Alameda and North Main)	211	1	March 7, 1979
5426 Budlong Ave.	Residence [Primary Address: 1157 W. 55th St.]	510	8	January 11, 1991
7851 Budlong Ave.	Presidents' House (Demolished)	185	8	April 19, 1978
325 S. Bunker Hill Ave.	Castle, The (Destroyed by Fire)	27	9	May 8, 1964
339 S. Bunker Hill Ave.	Salt Box, The (Destroyed by Fire)	5	9	August 6, 1962
12014 - 12024 Burbank Bl.	David Familian Chapel [Primary Address: 5540 Laurel Canyon Bl.]	199	2	September 20, 1978
607 Burnside Ave.	Apartment Building	423	4	March 31, 1989
626 Burnside Ave.	Apartment Building	424	4	March 31, 1989
636 Burnside Ave.	Apartment Building	425	4	March 31, 1989
654 Burnside Ave.	Apartment Building	426	4	March 31, 1989
1355 N. Cahuenga Bl.	Fire Station #27	165	13	October 20, 1976
1708 Cahuenga Bl.	Security Trust & Savings Building [Primary Address: 6367 - 6385 Hollywood Bl.]	334	13	December 18, 1987
23537 Calabasas Rd.	Leonis Adobe	1	11	August 6, 1962
1847 & 1846 Camino Palmero	Toberman, C. E. Estate	285	13	October 3, 1984
6809 - 6819 Camrose Dr.	Highland-Camrose Bungalow Village [Primary Address: 2101 - 2131 N. Highland Ave.]	291	13	April 23, 1985
Canoga Ave.	Pepper Trees [Woodland Hills] [From Ventura Bl. South To Saltillo St.]	93	3	January 5, 1972
4201 - 4231 Carlota Blvd.	Lummis, Charles Residence and Surrounding Gardens (El Alisal) [Primary Address: 200 - 212 E. Avenue 43]	68	1	September 2, 1970
5552 Carlton Way	Dunning House	441	13	May 31, 1989
1300 Carroll Ave.	Residence	51	1	May 24, 1967
1316 Carroll Ave.	Residence	76	1	February 3, 1971
1320 Carroll Ave.	Residence	77	1	February 3, 1971
1321 Carroll Ave.	Residence [Alternate Address: 1310 - 1316 Kellam Ave.]	176	1	July 13, 1977
1324 Carroll Ave.	Residence	78	1	February 3, 1971
1321 - 1325 Carroll Ave.	Residence [Alternate Address: 1314 - 1320 Kellam Ave.]	109	1	January 3, 1973
1329 Carroll Ave.	Residence	73	1	February 3, 1971
1330 Carroll Ave.	Residence (aka Sessions, Charles Residence)	52	1	May 24, 1967
1344 Carroll Ave.	Residence	79	1	February 3, 1971
1345 Carroll Ave.	Residence	74	1	February 3, 1971
1355 Carroll Ave.	Residence	75	1	February 3, 1971
1407 - 1409 Carroll Ave.	Residence	189	1	May 3, 1978

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
1411 - 1439	Carroll Ave.	Residence and Carriage House	190	1	May 3, 1978
1415	Carroll Ave.	Bates House	399	1	November 29, 1988
1441 - 1443½	Carroll Ave.	Residence	191	1	May 3, 1978
610 - 614	Carondelet	Park Plaza Hotel [Primary Address: 603 - 607 Park View St.]	267	1	June 24, 1983
637 - 641	Carondelet	La Fonda Restaurant Building [Primary Address: 2501 - 2511 Wilshire Bl.]	268	1	June 24, 1983
1051 - 1055	Cary Ave.	Drum Barracks [Wilmington]	21	15	June 7, 1963
109 - 119 N.	Central Ave.	Hompa Hongwanji Buddhist Temple [Primary Address: 355 - 369 E. 1st St.]	313	9	October 24, 1986
1200 - 1334 S.	Central Ave.	Coca-Cola Building [Alternate Addresses: 1211 - 1259 Naomi St., 1300 - 1422 E. 12th St., 1415 E. 14th St.]	138	9	February 5, 1975
1401 S.	Central Ave.	Former Fire Station #30	289	9	February 15, 1985
4225 - 4233 S.	Central Ave.	Dunbar Hotel [Alternate Address: 1067 42nd Pl.]	131	9	August 4, 1974
4504 S.	Central Ave.	Site of the Original Vernon Branch Library (Excluding the Present 1975 Building)	306	9	June 27, 1986
S.	Chatsworth Park	Old Stage Coach Trail Property	92	12	January 5, 1972
N.	Chatsworth	Stoney Point Outcroppings	132	12	November 20, 1974
	Chatsworth Park South	Palmer, Minnie H. Residence	133	12	November 20, 1974
203	Chautauqua Bl.	Case Study House #8 The Eames House & Studio & Grounds	381	11	July 15, 1988
205	Chautauqua Bl.	Case Study House #9, The John Entenza House (Excluding Non-Historic Non-Original Additions)	530	11	April 30, 1991
8	Chester Pl.	Doheny Mansion	30	1	January 8, 1965
2500 - 2520	Cimarron St.	Clark, Williams Andrews Memorial Library [Alternate Addresses: 2152 - 2200 W. 25th St., 2153 - 2215 W. Adams Bl., 2501 Gramercy Pl.]	28	10	October 9, 1964
11015	Clover Ave.	Moreton Bay Fig Tree [Primary Address: 11000 National Bl.]	19	5	May 10, 1963
364	Cloverdale Ave.	Apartment Building	427	4	April 7, 1989
430	Cloverdale Ave.	Villa Cintra	428	4	April 7, 1989
601	Cloverdale Ave.	Apartment Building	429	4	April 7, 1989
603	Cochran Ave.	Cornell Apartments	430	4	April 7, 1989
3700 - 3946	Coldwater Canyon Ave.	St. Saviour's Chapel, Harvard School	32	13	February 5, 1965
1760	Colorado Bl.	Argus Court	471	14	December 20, 1981
1841 - 1855	Colorado Bl.	Eagle Rock Women's Twentieth Century Clubhouse [Primary Address: 5101 - 5105 Hermosa Ave.]	537	14	July 2, 1991
2031 - 2035	Colorado Bl.	Eagle Rock City Hall [Alternate Address: 5110 Maywood]	59	14	February 26, 1969
2225	Colorado Bl.	Old Eagle Rock Branch Library	292	14	April 10, 1985
10116	Commerce Ave.	Bolton Hall [Tujunga] [Alternate Address: 7157 Valmont Dr.]	2	2	August 6, 1962
826 S.	Coronado St.	Residence [Primary Address: (moved from) 633 W. 15th St.]	167		
3340	Country Club Drive	Milbank/McFie Estate [Primary Address: 1130 Arlington Ave.]	420	10	December 13, 1988
1803 - 1811	Courtney Ave.	Courtney Desmond Estate	445	13	June 20, 1989
6501 - 6505	Crenshaw Bl.	Hyde Park Congregational Church (Site of...Demolished) [Alternate Address: 3408 - 3416 Hyde Park Bl.]	18	6	May 10, 1963
6434	Crescent St.	Whaley, Dr. Franklin S. Residence	528	14	April 23, 1991

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
1508 - 1597	Crossroads of the World	Crossroads of the World [Primary Address: 6671 - 6679 Sunset Bl.]	134	13	December 4, 1974
4730	Crystal Springs Dr.	Feliz Adobe	401	4	November 30, 1988
2417	Daly St.	Water & Power Building	384	1	August 5, 1988
7053 - 7067	De Longpre	A & M Records Studio [Primary Address: 1416 N. La Brea Ave.]	58	13	February 5, 1969
445 S.	Detroit Ave.	Apartment Building	438	4	May 19, 1989
450 S.	Detroit Ave.	Apartment Building	439	4	May 19, 1989
18650	Devonshire St.	Oakridge & Grounds	484	12	March 23, 1990
22360	Devonshire St.	Palmer, Minnie H. Residence [Chatsworth]	133	12	November 20, 1974
3725	Don Felipe Dr.	Sanchez Ranch (Adobe Structures Only)	487	6	May 1, 1990
915 - 917	Douglas St.	Residence	216	1	June 6, 1979
1101	Douglas St.	Residence [Alternate Address: 874 - 886 W. Kensington Rd.]	217	1	June 6, 1979
9901	Dronfield St.	Stonehurst Recreation Center Building	172	2	March 9, 1977
4616	Dundee Dr.	Lovell Health House	123	4	March 20, 1974
2700	Eagle St.	Residence	252	14	June 2, 1983
4340	Eagle Rock Bl.	Meyers House (Destroyed by Fire: 4/30/92)	461	14	November 3, 1989
701 - 5499	Eagle Rock View Rd.	The Eagle Rock [Primary Address: N. Figueroa St.]	10	14	November 16, 1962
700 - 5498	Eagle Rock View Rd.	The Eagle Rock [Primary Address: N. Figueroa St.]	10	14	November 16, 1962
1100	Eagle Vista Dr.	Eagle Rock Playground Clubhouse	536	14	July 2, 1991
5029	Echo St.	Kelman Residence & Carriage Barn	494	1	July 13, 1990
5907	Echo St.	Church, C. M. House	389	14	October 4, 1988
5915 - 5919	Echo St.	Griffith, G. W. E. House	374	14	July 15, 1988
1750 N.	Edgemont St.	13th Church of Christ Scientist	559	13	April 21, 1992
724 E.	Edgeware Rd.	Residence	206	1	January 3, 1979
945 E.	Edgeware Rd.	Residence	218	1	June 6, 1979
1093 W.	Edgeware Rd.	Eastlake Inn [Primary Address: 1442 Kellam Ave.]	321	1	May 20, 1987
5905 & 5910	El Mio Dr.	Residence (aka El Mio)	142	1	April 16, 1975
815	Elyria Dr.	Merrill, J. B. House	483	1	March 23, 1990
	Elysian Park	Chavez Ravine Arboretum, The	48	1	April 26, 1967
	Ensenada (Mexico)	S.S. Catalina (Last Known Location - Ensenada Mexico)	213	15	May 16, 1979
14401 - 14441	Erwin St. Mall	Valley Municipal Building, Van Nuys City Hall [Primary Address: 14410 - 14440 Sylvan St.]	202	11	October 18, 1978
1978	Estrella Ave.	Arnold, Lois Ellen Residence	498	1	June 12, 1990
2110	Estrella Ave.	Short, Hiram V. Residence	507	5	November 2, 1990
2119	Estrella Ave.	Alexander, Richard H. Residence	489	1	May 30, 1990
1001	Eubank Ave.	Powder Magazine (Wilmington) [Alternate Address: 361 E. Opp St.]	249	15	August 10, 1982
204 N.	Evergreen Ave.	Chinese Cemetery Shrine, Los Angeles (19th Century) on the Grounds of the Evergreen Cemetery	486	14	August 31, 1990
	Fairfax & 3rd St.	Farmers Market [Primary Address: 3rd & Fairfax]	543	4	July 24, 1991
	Fern Dell	Gabrielino Indian Site (Griffith Park)	112	4	October 29, 1974
611 - 625 S.	Figueroa St.	St. Paul's Cathedral (Site of...Demolished) [Alternate Address: 901 - 915 Wilshire Bl.]	66	9	May 6, 1970
644 - 646 S.	Figueroa St.	Fire Station #28	348	9	March 29, 1988
700 - 726 S.	Figueroa St	Barker Brothers Building [Primary Address: 800 - 898 W. 7th St.]	356	9	April 26, 1988

Address	Monument Name	Monument Number	Council District	Date Of Inclusion
873 - 877 S.	Figueroa St. Original Pantry [Alternate Address: 809 - 817 W. 9th St.]	255	9	October 5, 1982
938 - 940 S.	Figueroa St. Variety Arts Center Building	196	9	August 9, 1978
2421 S.	Figueroa St. Stimson Residence	212	8	August 16, 1979
2601 S.	Figueroa St. Auto Club of Southern California [Alternate Addresses: 650 W. Adams Bl., 661 W. 27th St.]	72	8	February 3, 1971
4200 N.	Figueroa St. Phillips, Ivar I. Dwelling	469	1	December 20, 1989
4204 N.	Figueroa St. Phillips, Ivar L. Residence	470	1	December 20, 1989
4601 N.	Figueroa St. Ziegler Estate (Main House, Grounds, Arroyo Stone Wall)	416	14	February 21, 1988
4605 N.	Figueroa St. Casa De Adobe	493	14	July 13, 1990
4755 - 4757 N.	Figueroa St. Hiner House	105	1	November 15, 1972
4939 N.	Figueroa St. Arroyo Stone House & Arroyo Stone Wall (Street Renamed Sycamore Terrace)	373	14	July 15, 1988
4967 - 4973 N.	Figueroa St. Field, Mary P. House & Arroyo Stone Wall (Street Renamed Sycamore Terrace)	372	14	July 15, 1988
4967 - 4973 N.	Figueroa St. Tustin House & Arroyo Stone Wall (Street Renamed Sycamore Terrace)	371	14	July 15, 1988
4979 - 4985 N.	Figueroa St. Herivel House & Arroyo Stone Wall (Street Renamed Sycamore Terrace)	370	14	July 15, 1988
4985 N.	Figueroa St. Johnson House & Arroyo Stone Wall (Street Renamed Sycamore Terrace)	369	14	July 15, 1988
5567 N.	Figueroa St. Masonic Temple [Primary Address: 104 - 112 N. Avenue 56]	282	1	August 29, 1984
5600 - 5608	Figueroa St. Highland Theatre Building	549	14	October 2, 1991
6301 N.	Figueroa St. Arroyo Saco Bank Building	492	14	July 30, 1990
N.	Figueroa St. Eagle Rock, The Rock Itself, (North Terminus of Figueroa) [Alternate Addresses: 700 - 5498 Eagle Rock View Rd., 701 - 5499 Eagle Rock View Rd., 72 Patrician Way, 77 Patrician Way]	10	14	November 16, 1962
4510	Finley Ave. Fletcher Dr. St. Mary of the Angels Church (Bridge Over L. A. River) [Primary Address: Los Angeles River]	136 322	13 4	December 4, 1974 July 21, 1987
532 - 538 S.	Flower St. California Club Building [Alternate Address: 539 - 553 S. Hope St.]	43	9	November 12, 1966
650 - 652 S.	Flower St. Roosevelt Building [Primary Address: 723 - 735 W. 7th St.]	355	9	April 26, 1988
709 - 715 S.	Flower St. Barker Brothers Building [Primary Address: 800 - 898 W. 7th St.]	356	9	April 26, 1988
5930 - 5936	Franklin Ave. Chateau Elysee [Alternate Addresses: 1806 - 1830 Tamarind Ave., 5925 - 5939 Yucca St.]	329	13	September 23, 1987
5959	Franklin Ave. Villa Carlotta [Alternate Address: 1913 - 1915 Tamarind Ave.]	315	13	October 28, 1986
6817	Franklin Ave. First United Methodist Church of Hollywood	248	13	December 4, 1981
	Franklin Ave. Franklin Avenue Bridge (Shakespeare Bridge) (Between George St. & Myra Ave.)	126	13	April 17, 1974
6915 - 6933	Franklin Ave. Franklin Garden Apartments (Site of...Demolished)	192	13	June 7, 1978
7001	Franklin Ave. Magic Castle	406	13	January 17, 1989
1001 - 1007 N.	Fries Ave. Wilmington Branch Library [Primary Address: 309 W. Opp St.]	308	15	June 27, 1986

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
146 S. 3601	Fuller Ave. Gaffey St. [San Pedro]	Howard/Nagin Residence	436	5	May 19, 1989
		Battery Osgood-Farley, Fort MacArthur Upper Reservation, bounded by Paseo del Mar, Roxbury Street, Leavenworth Drive, and a line north from the foot of Target Range Road to the Intersection with Leavenworth Drive [Alternate's listed on these streets also]	515	15	January 22, 1991
	Gaffey & 37th Sts.	Korean Bell & Belfry of Friendship, Angel's Gate Park [Alternate Address: 37th St.]	187	15	May 3, 1978
757 - 767	Garland Ave.	Residence	129	9	June 19, 1974
959	Gayley Ave.	Gayley Terrace	363	5	June 21, 1988
805 S.	Genesee Ave.	Buck House [Alternate Address: 5950 - 5958 W. 8th St.]	122	4	March 20, 1974
738 - 744	Gibbons St.	San Antonio Winery [Primary Address: 725 - 749 Lamar St.]	42	14	September 14, 1966
	Gibson (John Jr.) Park Gilmore Lane	U.S.S. Los Angeles Naval Monument Farmers Market [Primary Address: 3rd St. & Fairfax]	188 543	15 4	May 3, 1978 July 24, 1991
4200	Glenalbyn Dr.	Bent, Ernest & Florence Bent-Halstead House & Grounds Excluding Non-Landscaped Area Facing Avenue 42	394	1	November 4, 1988
4201	Glenalbyn Dr.	Bent, H. Stanley (House, Carriage House & Front Gardens)	395	1	November 4, 1988
4211	Glenalbyn Dr.	Treehaven, Guest House & Grounds	392	1	November 4, 1988
4224	Glenalbyn Dr.	Wiles House	393	1	November 4, 1988
1962	Glencoe Way	Freeman House	247	13	November 25, 1981
817 - 821 N.	Glendale Bl.	Residence	257	1	November 5, 1982
1712	Glendale Bl.	Sennett, Mack Studios	256	13	November 5, 1982
2607	Glendower Ave.	Ennis-Brown House	149	4	March 3, 1976
10618 - 10626	Graham Ave.	Towers of Simon Rodia [Primary Address: 1711 - 1765 E. 107 St.]	15	15	March 1, 1963
2501	Gramercy Pl.	William Andrews Clark Memorial Library [Primary Address: 2500 - 2520 Cimarron St.]	28	10	October 9, 1964
2528	Gramercy Pl.	Mansion and Formal Gardens [Primary Address: 2141 W. Adams Bl.]	197	10	August 23, 1978
455 S.	Grand Ave.	One Bunker Hill Building [Primary Address: 601 - 611 W. 5th St.]	347	9	March 25, 1988
531 - 535 S.	Grand Ave.	Mayflower Hotel	286	9	October 5, 1984
514 - 530 S.	Grand Ave.	Biltmore Hotel [Primary Address: 503 539 S. Olive St.]	60	9	July 2, 1969
703 - 719 S.	Grand Ave.	Boston Stores/J. W. Robinson's [Primary Address: 600 - 632 W. 7th St.]	357	9	April 26, 1988
839 - 861 S.	Grand Ave.	Embassy Auditorium & Hotel [Alternate Address: 501 W. 9th St.]	299	9	October 4, 1985
1615 - 1631	Grand Ave.	Young Apartments [Alternate Address: 303 - 311 17th St.]	317	9	January 7, 1987
2330 - 2338	Grand Ave.	St. Peter's Episcopal Church [24th and San Pedro]	53	15	December 6, 1967
743 S. 1740	Grandview St. Green Acres Pl.	Chouinard Institute of the Arts Greenacres [Primary Address: 1040 Angelo Dr.]	454 279	1 5	October 24, 1989 July 24, 1984
175	Greenfield Ave	Tischler Residence	506	5	October 9, 1990
18531	Gresham St.	Faith Bible Church	152	12	April 7, 1976
2054 - 2056	Griffin Ave.	Residence	144	1	May 21, 1975
2425	Griffin Ave.	Bowman Residence	443	1	June 20, 1989

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
3537	Griffin Ave.	Residence	145	1	May 21, 1975
2408 - 2412	Griffith Ave.	Second Baptist Church [Alternate Address: 1100 W. 24th St.]	200	9	October 18, 1978
	Griffith Park	Griffith Observatory [Primary Address: 2500 E. Observatory Rd.]	168	4	November 17, 1976
2710 - 2746	Griffith Park Bl.	Site of First Walt Disney Studio [Primary Address: 2701 - 2739 Hyperion Ave.]	163	13	October 6, 1976
14603 - 14607	Hamlin St.	Baird House	203	2	October 18, 1978
	Harbor Bl.	U. S. S. Los Angeles Naval Monument (Between 5th & 6th St. [San Pedro])	188	15	May 3, 1978
	Harbor View Mem. Park	St. Peter's Episcopal Church	53	15	December 6, 1967
625 - 647 S.	Harvard Bl.	Wilshire Boulevard Temple [Primary Address: 3641 - 3663 Wilshire Bl.]	116	4	March 21, 1973
2215 S.	Harvard Bl.	Phillips, Thomas W. Residence	551	10	November 13, 1991
2218 S.	Harvard Bl.	Residence [Alternate Address: 2216 - 2222 LaSalle Ave.]	117	8	April 4, 1973
2247 - 2271 S.	Harvard Bl.	Rindge House [Alternate Addresses: 1941 W. 25th St., 2256 - 2276 S. Hobart Ave.]	95	8	February 23, 1972
1139 S.	Harvard Bl.	Pect House	272	8	September 21, 1983
	Havana & Bleeker Sts.	Mission Wells & the Settling Basin	50	12	May 10, 1967
	Havenford Ave.	Founders' Oak (Between Sunset Bl. & Antioch St.) (Site of... Cut Down Due To Termite Infestation)	38	11	March 25, 1966
1471 - 1475	Havenhurst Dr.	Andalusia Apartments & Gardens	435	1	May 16, 1989
5944 - 5948	Hayes Ave.	Putman House	375	14	July 15, 1988
6028 - 6030	Hayes Ave.	Residence	143	14	April 16, 1975
817 - 823 N.	Hayworth	El Greco Apartments (Westwood) (Relocated From 1028 Tiverton St.)	231	5	June 30, 1980
5101 - 5105	Hermosa Ave.	Eagle Rock Women's Twentieth Century Clubhouse [Alternate Address: 1841 - 1855 Colorado Blvd.]	537	14	July 2, 1991
859 N.	Highland Ave.	Gilmore Gasoline Service Station (Including Structure and Site)	508	13	November 2, 1990
* 1920 - 1928 N.	Highland Ave.	Highland Towers Apartments	475	13	October 16, 1990
* 2000 N.	Highland Ave.	Roman Gardens	397	13	November 23, 1988
* 2035 N.	Highland Ave.	Hollywood American Legion Post 43	462	13	November 3, 1989
* 2101 - 2131 N.	Highland Ave.	Highland-Camrose Bungalow Village [Alternate Addresses: 2110 - 2118 Woodland Way, 6809 - 6819 Camrose Dr., 6814 - 6836 Alta Loma Terr.]	291	13	April 23, 1985
	* Highland Ave.	Palm Trees and the Median Strip (Between Wilshire & Melrose)	94	4	January 26, 1972
	Highway 395 Hill & 3rd	Manzanar (Inyo County)	160		September 15, 1976
		Angel's Flight [Primary Address: 3rd St. & Hill]	4	9	August 14, 1962
415 - 431 S.	Hill St.	Subway Terminal Building [Alternate Address: 416 - 424 Olive St.]	177	9	July 27, 1977
453 - 457 S.	Hill St.	Title Guarantee & Trust Co. Building [Primary Address: 401 - 411 W. 5th St.]	278	9	July 11, 1984
757 - 761 S.	Hill St.	Garfield Building [Primary Address: 401 - 415 W. 5th St.]	121	9	August 22, 1973
810 S.	Hill St.	Hamburger's Dept. Store (May Co. Downtown) [Primary Address: 801 - 829 S. Broadway]	459	9	October 17, 1989
855 S.	Hill St.	Coast Federal Savings Building [Primary Address: 315 W. 9th St.]	346	9	March 11, 1988
1036 - 1044 S.	Hill St.	Mayan Theater	460	9	October 17, 1989

* Indicates Monument Near the CMP System.

Address	Monument Name	Monument Number	Council District	Date Of Inclusion
1046 - 1054 S. Hill St.	Belasco Theater (Now Metropolitan Community Church)	476	9	January 30, 1990
2616 S. Hobart Bl.	Fire Station #18	349	8	March 29, 1988
618 - 646 S. Hobart Ave.	Wilshire Boulevard Temple [Primary Address: 3641 - 3663 Wilshire Bl.]	116	4	March 21, 1973
2256 - 2276 S. Hobart Ave.	Rindge House [Primary Address: 2247 - 2271 S. Harvard Bl.]	95	8	February 23, 1972
Hollenbeck Park Lake	Old Sixth Street Wooden Bridge (Site Of...Removed)	54	9	May 22, 1968
5642 Holly Oak Dr.	Edwards House	260	13	May 17, 1983
Hollywood (The City of)	Hollywood, The Sign On Mount Lee	111	4	February 7, 1973
4800 Hollywood Bl.	Barnsdall Park	34	13	February 26, 1965
4800 Hollywood Bl.	Hollyhock House	12	13	January 4, 1963
4800 Hollywood Bl.	Arts and Crafts Building, Barnsdall Park	33	13	February 26, 1965
5500 - 5510 Hollywood Bl.	Hollywood-Western Building	336	13	January 6, 1988
5524 Hollywood Bl.	Falcon Studios	382	13	July 26, 1988
6225 - 6249 Hollywood Bl.	Pantages Theater [Alternate Address: 6225 - 6249 Hollywood Bl.]	193	13	July 5, 1978
6367 - 6385 Hollywood Bl.	Security Trust and Savings Building [Alternate Address: 1708 Cahuenga Bl.]	334	13	December 18, 1987
6439 Hollywood Bl.	Stromberg, William Clock	316	13	January 7, 1987
6541 Hollywood Bl.	Janes House	227	13	April 3, 1980
6727 - 6733 Hollywood Bl.	Artisan's Patio Complex, Including Open Space and Palm Tree (Excluding the 1969 Building Addition)	453	13	October 17, 1989
6834 Hollywood Bl.	El Capitan Theater	495	13	July 12, 1990
6840 Hollywood Bl.	Hollywood Masonic Temple	277	13	June 12, 1984
6915 - 6927 Hollywood Bl.	Grauman's [Now Mann's] Chinese Theater	55	13	June 5, 1968
7000 - 7016 Hollywood Bl.	Hollywood Roosevelt Hotel	545	13	August 13, 1991
7021 Hollywood Bl.	Garden Court Apartments (Demolished)	243	13	April 28, 1981
8161 Hollywood Bl.	Storer House	96	13	February 23, 1972
Hollywoodland	Hollywood Walk of Fame (Between Gower St. & Sycamore Ave.) and (Vine St. between Yucca St. & Sunset Bl.) [Alternate Address: Vine St.]	194	13	July 5, 1978
Hollywoodland	Hollywoodland's Historic Granite Retaining Walls and Interconnecting Granite Stairs	535	4	June 11, 1991
Hollywoodland	Hollywoodland's Historic Granite Retaining Walls and Interconnecting Granite Stairs	535	13	June 11, 1991
1221 & 1223 Holmby Ave.	Holmby House (Westwood)	318	5	February 13, 1987
3800 Homer St.	Beaudry Avenue House	108	1	January 3, 1973
3800 Homer St.	Hale House, Heritage Square	40	1	June 15, 1966
3800 Homer St.	Palms Southern Pacific Railroad Depot, Heritage Square	22	1	August 9, 1963
3800 Homer St.	Mount Pleasant House, Heritage Square	98	1	March 15, 1972
3800 Homer St.	Lincoln Avenue Church Building, Heritage Square	245	1	June 4, 1981
3800 Homer St.	Octagon House, Heritage Square	413	1	January 20, 1989
3800 Homer St.	Valley Knudsen Garden Residence, Heritage Square	65	1	April 15, 1970
1327 - 1435 N. Hoover St.	KCET Studios [Primary Address: 4391 - 4421 Sunset Bl.]	198	13	September 20, 1978
2600 S. Hoover St.	Sunshine Mission [Alternate Address: 954 - 1008 W. Adams Bl.]	241	8	April 9, 1981
2653 S. Hoover St.	Cockins House, The	519	8	February 1, 1991

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
2703 - 2707 S.	Hoover St.	Residence [Alternate Address: 1110 W. 27th St.]	240	8	April 9, 1981
2801 - 2803 S.	Hoover St.	Forthmann House [Primary Address: 1102 - 1114 W. 28th St.]	103	9	October 4, 1972
7011 S.	Hoover St.	Mount Carmel High School (Demolished) [Alternate Address: 814 70th St.]	214	9	June 6, 1979
539 - 553 S.	Hope St.	California Club Building [Primary Address: 532 - 538 S. Flower St.]	43	9	November 12, 1966
550 S.	Hope St.	Church of the Open Door (Demolished)	323	9	July 28, 1987
710 - 722 S.	Hope St.	Boston Stores/J. W. Robinson's [Primary Address: 600 - 632 W. 7th St.]	357	9	April 26, 1988
953 S.	Hope St.	Standard Oil Building [Primary Address: 601 - 605 W. Olympic Bl.]	340	9	January 26, 1988
2640	Huron St.	Huron Substation, Los Angeles Railway	404	1	December 20, 1988
3408 - 3416	Hyde Park Bl.	Site of Hyde Park Congregational Church [Primary Address: 6501 - 6505 Crenshaw Bl.]	18	6	May 10, 1963
2701 - 2739	Hyperion Ave.	Disney, Walt Studio (Site of First) [Alternate Addresses: 2710 - 2746 Griffith Park Bl., 3616 - 3618 Monon St.]	163	13	October 6, 1976
5701 W.	Imperial Hwy.	Hangar #1 Building	44	6	November 16, 1966
647 - 655 W.	Jefferson Bl.	Shrine Auditorium [Alternate Addresses: 3216 - 3244 Royal St., 700 W. 32nd St.]	139	8	March 5, 1975
1368 W.	Jefferson Bl.	Korean Independence Memorial Building	548	8	October 2, 1991
2226 - 2230 W.	Jefferson Ave.	Westminster Presbyterian Church	229	8	June 11, 1980
350 - 354 N.	June St.	La Casa De Las Campanas	239	4	April 9, 1981
23555	Justice St.	Rancho Sombra del Roble [Orcutt Ranch Horticulture Center] [Canoga Park]	31	3	January 22, 1965
1310 - 1316	Kellam Ave.	Residence [Primary Address: 1321 Carroll Ave.]	176	1	July 13, 1977
1314 - 1320	Kellam Ave.	Residence.[Primary Address: 1321 - 1325 Carroll Ave.]	109	1	January 3, 1973
1334	Kellam Ave.	Residence	207	1	January 17, 1979
1343	Kellam Ave.	Residence	220	1	June 6, 1979
1347 - 1349	Kellam Ave.	Residence & Carriage House	221	1	June 6, 1979
1405 - 1411	Kellam Ave.	Residence	222	1	June 6, 1979
1411 - 1417	Kellam Ave.	Carriage House	166	1	November 3, 1976
1442	Kellam Ave.	Eastlake Inn [Alternate Address: 1093 W. Edgeware Rd.]	321	1	May 20, 1987
638 - 642	Kelton Ave.	Elkay Apartments	368	5	June 21, 1988
644 - 648	Kelton Ave.	Kelton Apartments	365	5	June 21, 1988
822 - 826	Kensington Rd.	Residence	223	1	June 20, 1979
874 - 886 W.	Kensington Rd.	Residence [Primary Address: 1101 Douglas St.]	217	1	June 6, 1979
890 - 892 W.	Kensington Rd.	Collins Residence (Relocated From 2930 Whitter Bl.)	266	1	June 10, 1983
1203 & 1207	Kipling Ave.	Residence, Playhouse & Studio	383	14	August 5, 1988
1416 N.	La Brea Ave.	A & M Records Studio (Former Charlie Chaplin Studio) [Alternate Address: 7053 - 7067 De Longpre]	58	13	February 5, 1969
310 - 312 S.	LaFayette Park Pl.	McKinley Mansion [Alternate Address: {Leo is looking it up} 3rd St.]	326	1	September 9, 1987
666 - 678	LaFayette Park Pl.	Granada Building	238	1	April 9, 1981
1200	Lakme Ave. (Block of)	Camphor Trees	509	15	December 18, 1990
2460	Lake Hollywood Dr.	Lake Hollywood Reservoir (Including Mulholland Dam)	421	13	March 31, 1989
841 - 845 S.	Lake St.	Residence & Carriage House	208	1	January 17, 1979

Address	Monument Name	Monument Number	Council District	Date Of Inclusion
725 - 749	Lamar St. San Antonio Winery [Alternate Address: 738 - 744 Gibbons St.]	42	14	September 14, 1966
3919	Lankershim Bl. Campo De Cahuenga	29	4	November 13, 1964
5106 - 5108	Lankershim Bl. Department of Water & Power Building	232	4	July 14, 1980
2216 - 2222	LaSalle Ave. Residence [Primary Address: 2218 S. Harvard Bl.]	117	8	April 4, 1973
1510 - 1536	Las Palmas Ave. Crossroads of the World [Primary Address: 6671 - 6679 Sunset Bl.]	134	13	December 4, 1974
22601	Lassen St. Chatsworth Community Church, Oakwood Memorial Park	14	12	February 15, 1963
	Lassen St. Olive Trees, 76 Mature (Between Topanga Canyon Bl. & Farralone Ave.)	49	12	May 10, 1967
5540	Laurel Canyon Bl. Familiian, David Chapel of Temple Adat Ari El (North Hollywood) [Alternate Address: 12014 - 12024 Burbank Bl.]	199	2	September 20, 1978
11833 - 11847	Laurelwood Dr. Laurelwood Apartments	228	2	April 22, 1980
	Leavenworth Dr. (see Battery Osgood-Farley) [Primary Address: 3601 Gaffey St.]	515	15	January 22, 1991
2960 - 2982	Leeward Ave. First Baptist Church of Los Angeles [Primary Address: 760 S. Westmoreland Ave.]	237	10	April 9, 1981
3771 - 3801	Lenawee Furthmann Mansion	502	6	June 20, 1990
4231 - 4363 S.	Lincoln Bl. Sa-Angna (Sacred Burial and Village Site of the Gabrielino Indians), The Portion Of This Address Within a 40 Foot Strip Bordering the Pacific Electric Railway & the Railway Right of Way in a Rectangle South of 4321 - 4363 Lincoln Blvd. to the City Line.	490	6	May 1, 1990
10800 - 10808	Lindbrook Dr. Lindbrook, The	324	5	August 14, 1987
10830	Lindbrook Dr. Courtyard Apartment Complex	446	5	August 1, 1989
10836 - 10840	Lindbrook Dr. Courtyard Apartment Complex	447	5	August 1, 1989
10885 - 10887	Lindbrook Dr. Bratskeller/Egyptian Theater [Primary Address: 1142 - 1154 Westwood Bl.]	360	5	June 21, 1988
2150 - 2158	Live Oak Dr. Taggart House [Alternate Address: 5423 Black Oak Dr.]	521	13	March 15, 1991
1215 - 1233	Lodi Pl. Y.W.C.A. Hollywood Studio Club	175	13	May 4, 1977
306	Loma Dr. Clark, Mary Andrews Residence of the YWCA	158	1	July 7, 1976
2614	Longwood Dr. Church of the Advent [Primary Address: 4976 - 4990 Adams Bl.]	512	10	January 16, 1991
	Lorena St. Bridge [Primary Address: 4th St. & Lorena]	265	14	June 7, 1983
419 S.	Lorraine Bl. Evans Residence	115	4	March 21, 1973
	Los Angeles River Fletcher Drive Bridge Over The Los Angeles River [Alternate Address: Fletcher Dr.]	322	4	July 21, 1987
	Los Angeles River Glendale-Hyperion Bridge, (State Freeway & Riverside Drive, Between Ettrick St. & Glenfeliz Bl.)	164	4	October 20, 1976
203 - 215 S.	Los Angeles St. Saint Vibiana's Cathedral [Primary Address: 110 - 136 E. 2nd St.]	17	9	May 10, 1963
601 - 619 S.	Los Angeles St. Coles Pacific Electric Buffet/Pacific Electric Building [Primary Address: 100 - 134 E. 6th St.]	104	9	October 18, 1972
1200 - 1210	Los Angeles St. Site of Saint Joseph's Church [Primary Address: 200 - 226 E. 12th St.]	16	9	May 10, 1963

Address	Monument Name	Monument Number	Council District	Date Of Inclusion
Los Feliz Bl.	Mulholland, William Memorial Fountain [Alternate Address: Riverside Dr.] (fountain is located at the corner)	162	4	October 6, 1976
Los Feliz Bl.	Cedar Trees (Between Riverside Dr. & Western Ave.) (Southside of Street)	67	4	May 20, 1970
Los Feliz Bl.	Cedar Trees (Between Riverside Dr. & Western Ave.) (Northside of Street)	67	13	May 20, 1970
4600 - 4604	Los Feliz Bl. Monterey Apartments	353	4	May 11, 1988
Louise Ave.	Oak Tree (210 Feet South of Ventura Bl.)	24	11	September 6, 198
637 S.	Lucerne Bl. Higgins/Verbeck/Hirsch Mansion	403	4	December 14, 198
708 S.	Lucerne Bl. Wilshire United Methodist Church [Primary Address: 4350 - 4366 Wilshire Bl.]	114	4	March 7, 1973
741 - 743	Lucerne Bl. The Ebell of Los Angeles Building [Primary Address: 4400 Wilshire Bl.]	250	10	August 25, 1982
245 S.	Lucas Ave. Nurses Club, Los Angeles [Alternate Address: 1405 Miramar St.]	352	1	April 8, 1988
401 E.	M St. General Phineas Banning Residence [Wilmington]	25	15	October 11, 1963
1030	Macy St. Residence	102	14	October 4, 1972
	Macy St. Macy Street Viaduct, Crossing the Los Angeles River (Between Mission Road & Vignes Street)	224	9	August 1, 1979
	Macy St. Macy Street Viaduct	224	14	August 1, 1979
	Macy St. Plaza Park [Primary Address: Sunset Bl. & Plaza]	64	9	April 1, 1970
2612	Magnolia Ave. Ecung Ibbetson House & Moreton Bay Fig Tree [Primary Address: 1180 - 1190 W. Adams Bl.]	350	8	March 29, 1988
2670 - 2676	Magnolia Ave. Miller & Harriot Tract House [Primary Address: 1157 - 1163 W. 27th St.]	242	8	April 9, 1981
13242	Magnolia Bl. Magnolia, The	293	11	June 18, 1985
15357	Magnolia Bl. Tower of Wooden Pallets [Van Nuys]	184	11	April 19, 1978
N.	Main St. Plaza Park [Primary Address: Sunset Bl. & Plaza]	64	9	April 1, 1970
200 - 248 S.	Main St. Saint Vibiana's Cathedral [Primary Address: 110 - 136 E. 2nd St.]	17	9	May 10, 1963
352 - 350 S.	Main St. Barclay Hotel [Primary Address: 103 - 107 W. 4th St.]	288	9	February 1, 198:
401 - 411 S.	Main St. Farmers & Merchants Bank Building [Alternate Address: 110 W. 4th St.]	271	9	August 9, 1983
600 - 616 S.	Main St. Coles Pacific Electric Buffet/Pacific Electric Building [Primary Address: 100 - 134 6th St.]	104	9	October 18, 1972
521 N.	Main St. First Cemetery of Los Angeles, (Site of)	26	9	March 20, 1964
1402	Malvern Ave. Residence [Primary Address: 1866 W. 14th St.]	244	1	April 30, 1981
6266	Manchester Loyola Theater [Primary Address: 8600 - 8610 Sepulveda Bl.]	259	6	December 17, 198
1209 S.	Manhattan Pl. Wilshire Ward Chapel	531	10	May 10, 1991
5128	Marathon St. Jardinette Apartments	390	13	October 4, 1988
1146 - 1160 N.	Marine Ave. Memory Chapel, Calvary Presbyterian Church [Wilmington]	155	15	May 5, 1976
6204	Marmion Way San Encino Abbey [Primary Address: 6201 - 6211 Arroyo Glen]	106	14	November 15, 19
8225	Marmont Ln. Chateau Marmont [Primary Address: 8215 - 8221 Sunset Bl.]	151	13	March 24, 1976
1443 - 1447 N.	Martel Ave. Residence	246	13	November 25, 19

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
1437 N. 101 - 121	Martel Ave. Marymount Pl.	Residence Marymount High School [Primary Address: 10643 - 10685 Sunset Bl.]	527 254	13 5	April 2, 1991 September 28, 1982
5110	Maywood	Eagle Rock City Hall [Primary Address: 2031 - 2035 Colorado Bl.]	59	14	February 26, 1969
7570	McGroarty Terr.	McGroarty Home and Grounds [Tujunga]	63	2	February 4, 1970
6121	Melrose Ave.	Fremont, John C. Branch Library	303	13	June 27, 1986
3990	Menlo Ave.	Exposition Club House	127	8	May 1, 1974
1923	Micheltorena	Canfield-Moreno Estate	391	13	October 4, 1988
2323	Micheltorena	Tierman House	124	13	April 3, 1974
1405	Miramar St.	Los Angeles Nurses Club [Primary Address: 245 S. Lucas Ave.]	352	1	April 8, 1988
1425	Miramar St. Mission Road	Residence Lincoln Park Carousel, at Valley Bl. (Site of) [Destroyed by Fire]	39 153	1 14	June 15, 1966 April 21, 1976
2639	Monmouth Ave.	Birthplace of Adlai E. Stevenson III (Site of) (The Site Itself is the Monument and Not Any Structure Located Upon It)	35	8	August 20, 1965
3616 - 3618	Monon St.	Site of the First Walt Disney Studio [Primary Address: 2701 - 2739 Hyperion Ave.]	163	13	October 6, 1976
8244	Monteel Rd.	Chateau Marmont [Primary Address: 8215 - 8221 Sunset Bl.]	151	13	March 24, 1976
5721 - 5729 6112	Monte Vista St. Monte Vista St.	Sunrise Court Department of Water and Power Distributing Station No. 2 [Primary Address: 225 N. Avenue 61]	400 558	1 1	November 23, 1988 April 21, 1992
2249	Mount Carmel Park Mountain Oak Dr.	Mount Carmel High School Arzner/Morgan Residence	214 301	9 13	June 6, 1979 February 28, 1986
234	Museum Dr.	Southwest Museum	283	14	August 29, 1984
1211 - 1259	Naomi St.	Coca-Cola Building [Primary Address: 1200 - 1334 Central Ave.]	138	9	December 5, 1975
11000	National Bl.	Moreton Bay Fig Tree [Alternate Addresses: 11015 Clover Ave., 3010 Tilden Ave.]	19	5	May 10, 1963
1523 - 1537 401 - 407 S.	Neptune Ave. New Hampshire Ave.	St. John's Episcopal Church [Wilmington] Korean Philidelphia Church [Alternate Address: 3401 - 3415 W. 4th St.]	47 91	15 4	March 15, 1967 November 17, 1971
650 - 666 S.	New Hampshire Ave.	I. Magnin & Company Building [Primary Address: 3240 Wilshire Blvd.]	534	10	June 11, 1991
	Nichols Canyon Rd.	North end of Road (Site of) the Burial Place of J. B. Lankershim	181	13	January 18, 1978
634 - 646 S.	Normandie Ave.	Wilshire Christian Church Building [Alternate Address: 3461 Wilshire Bl.]	209	4	January 17, 1979
1324 - 1420 S.	Normandie Ave.	Saint Sophia Cathedral [Alternate Address: 2780 Pico Bl.]	120	8	June 6, 1973
2235	Norwalk Ave.	Eagle Rock Women's Christian Temperance Union Home for Women (WCTU Home), lots 7, 8, and 9, excluding the 1940's one- story addition on the north west corner	562	14	May 28, 1992
605 E. 1828 S.	O St. Oak St.	Wilmington Cemetery Casa Camino Real [Alternate Address: Washington Bl.]	414 300	15 1	January 24, 1989 October 29, 1985
2500 E.	Observatory Rd.	Griffith Observatory [Alternate Address: Griffith Park]	168	4	November 17, 1976
1530 - 1534 N.	Ogden Dr.	Bollman House	235	13	November 3, 1980

Address	Monument Name	Monument Number	Council District	Date Of Inclusion	
	Old Dock St.	Fireboat #2 & Firehouse #112 [San Pedro] (Firehouse Demolished in 1986)	154	15	May 5, 1976
416 - 424	Olive St.	Subway Terminal Building [Primary Address: 415 - 431 S. Hill St.]	177	9	July 27, 1977
438 - 456	Olive St.	Philharmonic Auditorium (Demolished) [Primary Address: 421 - 433 W. 5th St.]	61	9	July 2, 1969
503 - 539 S.	Olive St.	Biltmore Hotel [Alternate Addresses: 512 W. 5th St., 514 - 530 S. Grand Ave.]	60	9	July 2, 1969
648 - 652	Olive St.	Los Angeles Athletic Club [Primary Address: 425 - 437 W. 7th St.]	69	9	September 16, 1970
649 S.	Olive St.	Giannini/Bank Of America [Alternate Address: 505 W. 7th St.]	354	9	April 26, 1988
617 S.	Olive St.	Oviatt Building	195	9	July 19, 1978
	Olvera St.	Olvera St. [Primary Address: Sunset Bl. & Plaza]	64	9	April 1, 1970
601 - 605 W.	Olympic Bl.	Standard Oil Building [Alternate Address: 953 S. Hope St.]	340	9	January 26, 1988
4625 W.	Olympic Bl.	Memorial Library	81	10	April 7, 1971
10940 - 10954	Ophir Dr.	Landfair Apartments	320	5	May 20, 1987
309 W.	Opp St.	Wilmington Branch Library [Alternate Address: 1001 - 1007 Fries Ave.]	308	15	June 27, 1986
561 E.	Opp St.	Powder Magazine [Primary Address: 1001 Eubank Ave.]	249	15	August 10, 1982
651 - 697	Oxford Ave.	Pellissier Building & Wiltern Theater [Primary Address: 3750 - 3790 Wilshire Bl.]	118	10	August 16, 1973
912 - 928	Palos Verdes St.	Harbor View House [Primary Address: 907 - 945 Beacon St.]	252	15	August 25, 1982
2123	Parkside Ave.	Villa Rafael	263	1	June 3, 1983
603 - 607	Park View St.	Park Plaza Hotel (Former Elk's Building) [Alternate Address: 2400 - 2416 W. 6th St., 610 - 614 Carondelet]	267	1	June 24, 1983
610 - 680	Park View St.	MacArthur Park [Primary Address: 2100 - 2320 W. 6th St.]	100	4	May 1, 1972
2230	Pasadena Ave.	Fire Station #1	156	1	July 7, 1976
4911	Pasadena Ave. Terr.	Judson. A. H. Estate (Street Renamed Sycamore Terrace) (Demolished: 4/92)	437	14	May 19, 1989
	Paseo del Mar	(see Battery Osgood-Farley) [Primary Address: 3601 Gaffey St.]	515	15	January 22, 1991
72	Patrician Way	The Eagle Rock [Primary Address: N. Figueroa St.]	10	14	November 16, 1962
77	Patrician Way	The Eagle Rock [Primary Address: N. Figueroa St.] (This is the primary listing for The Eagle Rock at Building & Safety)	10		
	Perahing Square	Spanish-American War Memorial	480	9	March 23, 1990
1600 W.	Pico Bl.	Doria Apartments	432	1	May 5, 1989
2780	Pico Bl.	Saint Sophia Cathedral [Primary Address: 1324 - 1420 S. Normandie Ave.]	120	8	June 6, 1973
	Plaza Park	Plaza Park [Primary Address: Sunset Bl. & Plaza]	64	9	April 1, 1970
1620	Pleasant Ave.	Residence (Site of)	97	14	February 23, 1972
711 - 717	Plymouth Bl.	Wilshire United Methodist Church [Primary Address: 4350 - 4366 Wilshire Bl.]	114	4	March 7, 1973
	Powers Pl. & 14th St.	Terrace Park & Powers Place	210	1	February 21, 1977
613	Ridgeley Dr.	Apartments	473	4	December 8, 1987

Address	Monument Name	Monument Number	Council District	Date Of Inclusion
Riverside Dr.	Mulholland, William Memorial Fountain [Primary Address: Los Feliz Bl.] (fountain is located at the corner)	162		
932 Rome Dr.	Mauer House	481	1	March 23, 1990
2838 Rowena Ave.	Engine Company #56	337	13	January 12, 1988
450 N. Rossmore	El Royale Apartments	309	4	September 2, 1986
Roxbury St.	(see Battery Osgood-Farley) [Primary Address: 3601 Gaffey St.]	515	15	January 22, 1991
3216 - 3244 Royal St.	Shrine Auditorium [Primary Address: 647 - 655 W. Jefferson Bl.]	139	8	March 5, 1975
4155 Russell Ave.	Midtown School (Site and four John Lautner Buildings)	553	13	November 12, 1991
3000 Rustic Canyon Rd.	Camp Josepho Malibu Lodge	547	11	October 2, 1991
149 Saint Andrews Pl.	Wilshire Branch Library	415	4	February 1, 1989
27 Saint James Pk.	Stearns, Colonel John E. Residence	434	1	May 16, 1989
414 Saint Pierre Rd.	Nicolosi Estate	485	5	April 6, 1990
15151 San Fernando Mission Bl.	San Fernando Mission (Only Convent Building, Original Church Damaged By Earthquake and Rebuilt)	23	7	August 9, 1963
1145 - 1149 San Julian St.	Cohn-Goldwater Building [Primary Address: 525 E. 12th St.]	119	9	August 16, 1973
740 - 748 S. San Pedro St.	Cast Iron Commercial Building [Alternate Address: 611 Agatha St.]	140	9	March 19, 1975
San Pedro Harbor	Municipal Ferry Building, Main Channel (Maritime Museum)	146	15	September 17, 1975
San Pedro Harbor	Timm's Landing	171	15	February 16, 1977
120 - 122 N. San Pedro St.	Japanese Union Church of Los Angeles (Exterior only)	312	9	October 24, 1986
San Vicente	Coral Trees [Brentwood] (Between 26th St. & Brigham Ave.)	148	11	January 7, 1976
* 4591 W. Santa Monica Bl.	Cahuenga Branch Library	314	13	October 24, 1986
* 10669 - 10683 Santa Monica Bl.	Grove, The	319	5	March 11, 1987
1203 - 1215 Santee St.	Saint Joseph's Church (Burned & Demolished) [Primary Address: 200 - 226 E. 12th St.]	16	9	May 10, 1963
2305 Scarff St.	Seyler Residence	407	1	January 20, 1989
2309 - 2311 Scarff St.	Burkhalter Residence	409	1	January 20, 1989
2341 Scarff St.	Seaman House	408	1	January 20, 1989
2342 Scarff St.	Creighton, Margaret T. & Bettie Mead Residence	455	1	October 24, 1989
2365 Scarff St.	Teod, Freeman G. House	457	1	October 24, 1989
2375 Scarff St.	Chalet Apartments	467	1	October 27, 1989
6678 - 6684 Selma	Crossroads of the World [Primary Address: 6671 - 6679 Sunset Bl.]	134	13	December 4, 1975
8600 - 8610 S. Sepulveda Bl.	Loyola Theater [Alternate Address: 6266 Manchester]	259	6	December 17, 1985
10940 Sepulveda Bl.	Andres Pico Adobe [Mission Hills]	7	7	September 21, 1965
2400 Shenandoah St.	Rocha House	13	10	January 28, 1963
16710 Sherman Way	Pacific Electric Picover Railway Station (90% - 95% Destroyed by Fire 6/4/1990)	405	3	January 11, 1989
21355 Sherman Way	Canoga Railroad Station - original structure (Excluding Additions and Facade Treatments on Roof and Structure)	488	3	May 30, 1990
23130 Sherman Way	Canoga Mission Gallery [Canoga Park]	135	3	December 4, 1975
23134 Sherman Way	Lederer Residence [Canoga Park]	204	3	November 15, 1975
2210 - 2212 Sichel St.	Sacred Heart Church (Church Building Only) [Alternate Address: 2801 Baldwin]	468	1	December 5, 1985

* Indicates Monument Near the CMP System.

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
2660	Sichel St.	Residence	533	1	June 11, 1991
	Silver Lake Bl.	Sunset Boulevard Bridge	236	4	April 9, 1981
	Silver Lake Bl.	Sunset Boulevard Bridge	236	13	April 9, 1981
W.	Silver Lake Dr.	Silver Lake & Ivanho Reservoirs (At Silver Lake Bl.)	422	13	March 31, 1989
200 N.	Spring St.	Los Angeles City Hall	150	9	March 24, 1976
1231 N.	Spring St.	River Station Area/Southern Pacific Railroad	82	1	June 16, 1971
413 - 443 S.	Spring St.	Title Insurance & Trust Company Building & Annex	385	9	August 5, 1988
501 - 511 S.	Spring St.	Palm Court, Alexandria Hotel	80	9	March 3, 1971
610 - 618 S.	Spring St.	Los Angeles Stock Exchange Building	205	9	January 3, 1979
1253	Stadium Way	Cathedral High School (Street Name Changed to "Bishops Road")	281	1	August 7, 1984
2000	Stadium Way	Barlow Sanitorium	504	1	October 9, 1990
10909	Strathmore Dr.	Sheets Apartments	367	5	June 21, 1988
11005 - 11013½	Strathmore Dr.	Strathmore Apartments	351	5	April 8, 1988
100 W.	Sunset Bl.	Plaza Church	3	9	August 6, 1962
4391 - 4421	Sunset Bl.	KCET Studios [Alternate Addresses: 1327 - 1435 N. Hoover St., 4314 - 4350 Sunset Dr.]	198	13	September 20, 1978
5800 - 5858	Sunset Bl.	Site of the Filming of First Talking Film [Alternate Address: 1424 - 1456 Bronson Ave.]	180	13	September 21, 1977
6671 - 6679	Sunset Bl.	Crossroads of the World [Alternate Addresses: 1508 - 1597 Crossroads of the World, 1510 - 1536 Las Palmas Ave., 6678 - 6684 Selma]	134	13	December 4, 1974
7771 - 7791	Sunset Bl.	Taft House (Burned & Demolished)	234	13	November 3, 1980
8215 - 8221	Sunset Bl.	Chateau Marmont [Alternate Addresses: 8225 Marmont Ln., 8244 Montecel Rd.]	151	13	March 24, 1976
10643 - 10685	Sunset Bl.	Marymount High School [Alternate Address: 101 - 121 Marymount Pl.]	254	5	September 28, 1982
11725	Sunset Bl.	Eastern Star Home, Front Grounds & Courtyards (Excluding the 1958 Addition)	440	11	May 16, 1989
15300 - 15318	Sunset Bl.	Pacific Palisades Business Block [Alternate Addresses: 15301 - 15327 Antioch St., 904 - 910 Via De La Paz]	276	11	April 24, 1984
	Sunset Bl. & Plaza	Plaza Park, (area bounded by Macy, Main, Alameda, & Arcadia) (El Pueblo) [Alternate Addresses: Alameda St., Arcadia, Macy St., Olvera St., Plaza Park, N. Main St.]	64	9	April 1, 1970
	Sunset Bl. & Plaza	El Pueblo (see Plaza Park) [Primary Address: Sunset Bl. & Plaza]	64	9	April 1, 1970
4314 - 4350	Sunset Dr.	KCET Studios [Primary Address: 4391 - 4421 Sunset Bl.]	198	13	September 20, 1978
1216 - 1220	Sunset Plaza Dr.	Sunset Plaza Apartments (Demolished 7/87)	233	13	October 9, 1980
1765 N.	Sycamore Ave.	Masquers Club, The (Demolished)	226	13	August 29, 1979
4909 - 4915 N.	Sycamore Terr.	Judson, A. H. Estate (Formerly 4911 Pasadena Avenue Terrace) (Demolished 4/1992)	437	14	May 19, 1989
4939 N.	Sycamore Terr.	Arroyo Stone House & Wall (Formerly 4939 N. Figueroa Street)	373	14	July 15, 1988
4967 - 4971 N.	Sycamore Terr.	Field, Mary P. House & Arroyo Stone Wall (Formerly 4967 - 4973 N. Figueroa Street)	372	14	July 15, 1988
4973 - 4977 N.	Sycamore Terr.	Tustin House & Arroyo Stone Wall (Formerly 4967 - 4973 N. Figueroa Street)	371	14	July 15, 1988

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
4979 - 4983 N.	Sycamore Terr.	Herivel House & Arroyo Stone Wall (Formerly 4979 - 4985 N. Figueroa Street)	370	14	July 15, 1988
4985 - 4989 N.	Sycamore Terr.	Johnson House & Arroyo Stone Wall (Formerly 4985 N. Figueroa Street)	369	14	July 15, 1988
14410 - 14440	Sylvan St.	Valley Municipal Building, Van Nuys City Hall [Alternate Address: 14401 - 14441 Erwin St. Mall]	202	11	October 18, 1978
14832 - 14836	Sylvan St.	Van Nuys Woman's Club Building	201	11	October 18, 1978
1806 - 1830	Tamarind Ave.	Chateau Elysee [Primary Address: 5930 - 5936 Franklin Ave.]	329	13	September 23, 1987
1913 - 1915	Tamarind Ave.	Villa Carlotta [Primary Address: 5959 Franklin Ave.]	315	13	October 28, 1986
	Target Range Road	(see Battery Osgood-Farley) [Primary Address: 3601 Gaffey St.]	515	15	January 22, 1991
1012 W.	Temple St.	Rochester, The (Dismantled on 2/14/79)	11	9	January 4, 1963
206	Thorne St.	Fargo House	464	14	November 3, 1989
3010	Tilden Ave.	Moreton Bay Fig Tree [Primary Address: 11000 National Bl.]	19	5	May 10, 1963
1028	Tiverton Ave.	El Greco Apartments [Primary Address: 817 - 823 N. Haworth]	231	5	June 30, 1980
2311	Toberman Ave.	Durfee House [Primary Address: 1001 - 1007 W. 24th St.]	273	1	January 4, 1984
801 S.	Towne Ave.	First African Methodist Episcopal Church (Site of) (Destroyed by Fire) [Alternate Address: 754 - 760 E. 8th St.]	71	9	January 6, 1971
	Travel Town	Little Nugget, The (Griffith Park)	474	4	January 26, 1990
5211 N.	Tujunga Ave.	Earhart, Amelia/North Hollywood Regional Library	302	4	June 27, 1986
701 - 709	Union Ave.	Young's Market (Formerly) [Primary Address: 1602 - 1614 W. 7th St.]	113	1	March 7, 1973
3616	University Ave.	Hancock Memorial Museum [U.S.C.]	128	8	May 15, 1974
1153 S.	Valencia St.	Welsh Presbyterian Church [Alternate Address: 1501 W. 12th St.]	173	1	April 20, 1977
	Valley Circle Bl. (near)	Chatsworth Reservoir Kiln Site [Primary Address: Woolsey Cyn. Rd.]	141	12	April 2, 1975
5609	Valley Oak Dr.	Samuels-Navarro House [Alternate Address: 2255 Verde Oak Dr.]	130	13	July 17, 1974
7157	Valmont Dr.	Bolton Hall [Primary Address: 10116 Commerce Ave.]	2	2	August 6, 1962
22633	Vanowen St.	Shadow Ranch House	9	3	November 2, 1962
	* Venice Bl.	Venice Canals, (Venice Boulevard on the North - Washington Street on the South - Ocean Avenue on the East - Strongs Drive on the West)	270	6	July 15, 1983
* 1920	Venice Bl.	Rosedale Cemetery [Primary Address: 1831 W. Washington Bl.]	330	10	December 1, 1987
* 9009 - 9031	Venice Bl.	Ivy Substation	182	10	February 1, 1978
* 14626	Ventura Bl.	La Reina Theater	290	5	March 6, 1985
2255	Verde Oak Dr.	Samuels-Navarro House [Primary Address: 5609 Valley Oak Dr.]	130	13	July 17, 1974
904 - 910	Via De La Paz	Pacific Palisades Business Block [Primary Address: 15300 - 15318 Sunset Bl.]	276	11	April 24, 1984
1262	Victoria Ave.	Still, William Grant Residence	169	10	December 1, 1976
1690	Victoria Ave.	Williams, Paul R. Residence	170	10	December 1, 1976
5112 - 5595	Village Green	Village Green	174	6	May 4, 1977

* Indicates Monument Near the CMP System.

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
	Vine St.	Hollywood Walk of Fame [Primary Address: Hollywood Bl.]	194	13	July 5, 1978
2801 E.	Wabash Ave.	Malabar Branch Library	304	14	June 27, 1986
416 - 426 S.	Wall St.	Wolfer Printing Company Building [Alternate Address: 301 - 311 Winston St.]	161	9	September 15, 1976
	Washington Bl.	Casa Camino Real [Primary Address: 1828 S. Oak St.]	300	1	October 29, 1985
1831 W.	Washington Bl.	Rosedale Cemetery [Alternate Address: 1920 Venice Bl.]	330	10	December 1, 1987
158 S.	Western Ave.	Fire Station #29	310	4	October 1, 1986
269 - 273 S.	Western Ave.	Crocker Bank Building [Alternate Address: 4359 - 4363 W. 3rd St.]	298	4	September 20, 1985
652 - 676 S.	Western Ave.	Pellissier Building & Wiltern Theater [Primary Address: 3750 - 3790 Wilshire Bl.]	118	10	August 16, 1973
2425 S.	Western Ave.	Villa Maria [Duffee House]	230	10	June 12, 1980
658 - 690	Westmoreland Ave.	Bullock's Wilshire [Primary Address: 3050 - 3070 Wilshire Bl.]	56	10	June 5, 1968
760 S.	Westmoreland Ave.	First Baptist Church of Los Angeles [Alternate Addresses: 2875 W. 8th St., 2960 - 2982 Leeward Ave.]	237	10	April 9, 1981
	Westshire Dr.	Two Stone Gates [Primary Address: Beachwood]	20	13	May 24, 1963
1045 - 1099	Westwood Bl.	Janss Investment Company Building (excluding 1045 - 1061 Westwood Bl.) [Alternate Address: 1072 - 1080 Broxton Ave.]	364	5	June 21, 1988
1142 - 1154	Westwood Bl.	Bratskeller/Egyptian Theater [Alternate Address: 10885 - 10887 Lindbrook Dr.]	360	5	June 21, 1988
10935 - 10943	Weyburn Ave.	Fox Bruin Theater [Primary Address: 926 - 950 Broxton Ave.]	361	5	June 21, 1988
10953 - 10961	Weyburn Ave.	Fox Village Theater [Primary Address: 949 - 961 Broxton Ave.]	362	5	June 21, 1988
	White Oak Ave.	Deodar Trees [Granada Hills] (Between San Fernando Mission & San Jose)	41	12	August 3, 1966
1720 - 1728	Whitley Ave.	Whitley Court	448	13	December 13, 1988
* 901 - 915	Wilshire Bl.	Site of Saint Paul's Cathedral [Primary Address: 611 - 625 S. Figueroa St.]	66	9	May 6, 1970
* 2501 - 2511	Wilshire Bl.	La Fonda Restaurant Building [Alternate Address: 637 - 641 Carondelet]	268	1	June 24, 1983
* 3050 - 3070	Wilshire Bl.	Bullock's Wilshire [Alternate Addresses: 2973 - 2989 W. 7th St., 655 - 685 Wilshire Pl., 658 - 690 Westmoreland Ave.]	56	10	June 5, 1968
* 3050 - 3070	Wilshire Bl.	I. Magnin Wilshire (See Bullock's Wilshire (listing above))	56	10	June 5, 1968
* 3240	Wilshire Bl.	I. Magnin & Company Building [Alternate Address: 650 - 666 S. New Hampshire Ave.]	534	10	June 11, 1991
* 3461	Wilshire Bl.	Wilshire Christian Church Building [Primary Address: 634 - 646 S. Normandie Ave.]	209	4	January 17, 1979
* 3641 - 3663	Wilshire Bl.	Wilshire Boulevard Temple [Alternate Addresses: 618 - 646 S. Hobart Ave., 625 - 647 S. Harvard Bl.]	116	4	March 21, 1973
* 3750 - 3790	Wilshire Bl.	Pellissier Building & Wiltern Theater [Alternate Addresses: 651 - 697 Oxford Ave., 652 - 676 S. Western Ave.]	118	10	August 16, 1973

* Indicates Monument Near the CMP System.

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
* 4117 - 4127	Wilshire Bl.	Los Altos Apartments	311	4	October 17, 1986
* 4350 - 4366	Wilshire Bl.	Wilshire United Methodist Church [Alternate Addresses: 708 S. Lucern Bl., 711 - 717 Plymouth Bl.]	114	4	March 7, 1973
* 4400	Wilshire Bl.	Ebell of Los Angeles Building, The [Alternate Address: 741 - 743 Lucerne Ave.]	250	10	August 25, 1982
* 5370	Wilshire Bl.	Darkroom, The (Facade Only)	451	5	August 1, 1989
* 5500 - 5522	Wilshire Bl.	Wilshire Tower	332	4	December 8, 1987
* 5515 - 5519	Wilshire Bl.	El Rey Theater	520	4	February 26, 1991
* 655 - 685	Wilshire Pl.	Bullock's Wilshire [Primary Address: 3050 - 3070 Wilshire Bl.]	56	10	June 5, 1968
67 - 71	Windward Ave.	Venice Arcades, Columns and Capitals	532	6	April 23, 1991
301 - 311	Winston St.	Wolfer Printing Co. Building [Primary Address: 416 - 426 S. Wall St.]	161	9	September 15, 1976
208 - 210½	Witmer St.	Witmer, David J. Family Houses and Compound [Alternate Address: 1422 W. 2nd St.]	538	1	July 2, 1991
627 - 635	Witmer St.	Foy House, The [Alternate Address: 4401 8th St.]	8	9	September 22, 1962
2110 - 2118	Woodland Way	Highland-Comrose Village [Primary Address: 2101 - 2131 N. Highland Ave.]	291	13	April 23, 1985
7875 - 7877	Woodrow Wilson Dr. Woolsey Cyn. Rd. (near)	Shulman House Chatsworth Reservoir Kiln Site [Alternate Address: Valley Circle Bl.]	325 141	13 12	August 26, 1987 April 2, 1975
2530	Workman St.	Lincoln Heights Library	261	1	June 3, 1983
6045	York Bl.	Northeast Police Station [Highland Park]	274	14	January 4, 1984
5925 - 5939	Yucca St.	Chateau Elysee [Primary Address: 5930 - 5936 Franklin Ave.]	329	13	September 23, 1987
355 - 369 E.	1st St.	Hompa Hongwanji Buddhist Temple, Los Angeles [Alternate Address: 109 - 119 N. Central Ave.]	313	9	October 24, 1986
110 - 136 E.	2nd St.	Saint Vibiana's Cathedral [Alternate Addresses: 200 - 248 S. Main St., 203 - 215 S. Los Angeles St.]	17	9	May 10, 1963
1422 W.	2nd St.	Witmer, David J. Family Houses and Compound [Primary Address: 208 - 210½ Witmer St.]	538	1	July 2, 1991
	3rd St. & Fairfax	Farmers Market — (Original Farmers Market area and Gilmore Adobe, including Farmers Market Dell Clock & original Gilmore Co. Office, as included on site plan w/stipulations adopted by Council on 7/24/91) [Alternate Addresses: Fairfax Blvd., Gilmore Lane]	543	4	July 24, 1991
	3rd St. & Hill	Angel's Flight (Dismantled 5/69) [Alternate Address: Hill & 3rd]	4	9	August 14, 1962
216 - 224 W.	3rd St.	Bradbury Building [Primary Address: 300 - 310 S. Broadway]	6	9	September 21, 1962
2512 - 2516 W.	3rd St.	Mother Trust Superet Center (Including Entire Site and All Improvements)	555	1	March 18, 1992
4359 - 4363 W.	3rd St.	Crocker Bank Building [Primary Address: 269 - 273 S. Western Ave.]	298	4	September 20, 1985
	4th St. & Lorena	Bridge	265	14	June 7, 1983
103 - 107 W.	4th St.	Barclay Hotel (Former Van Nuys Hotel) [Alternate Address: 352 - 350 S. Main St.]	288	9	February 1, 1985

* Indicates Monument Near the CMP System.

Address	Monument Name	Monument Number	Council District	Date Of Inclusion
110 W. 4th St.	Farmers & Merchants Bank Building [Primary Address: 401 - 411 S. Main St.]	271	9	August 9, 1983
3401 - 3415 W. 4th St.	Korean Philidelphia Church [Primary Address: 401 - 407 S. New Hampshire Ave.]	91	4	November 17, 1971
2532 5th Ave.	McDonough, Gordon L. House	417	9	February 21, 1989
225 E. 5th St.	Fire Station #23	37	9	February 18, 1966
401 - 411 W. 5th St.	Title Guarantee & Trust Company Building (Exterior Only) [Alternate Address: 453 - 457 S. Hill St.]	278	9	July 11, 1984
421 - 433 W. 5th St.	Philharmonic Auditorium (Demolished) [Alternate Address: 438 - 456 Olive St.]	61	9	July 2, 1969
512 W. 5th St.	Biltmore Hotel [Primary Address: 503 - 539 S. Olive St.]	60	9	July 2, 1969
601 - 611 W. 5th St.	One Bunker Hill Building [Alternate Address: 455 S. Grand Ave.]	347	9	March 25, 1988
630 W. 5th St.	Central Library Building & Grounds	46	9	March 1, 1967
100 - 134 E. 6th St.	Coles Pacific Electric Buffet/Pacific Electric Building (To Include Entire Building) [Alternate Addresses: 600 - 616 S. Main St., 601 - 619 S. Los Angeles St.]	104	9	October 18, 1972
217 - 219 W. 6th St.	Finney's Cafeteria	137	9	January 15, 1975
478 W. 6th St. [San Pedro]	Juarez Theater [Warner Brothers]	251	15	August 25, 1982
523 W. 6th St.	Pacific Mutual Building	398	9	November 23, 1988
2100 - 2320 W. 6th St.	MacArthur Park [Alternate Addresses: 601 - 631 S. Alvarado St., 610 - 680 Park View St.]	100	4	May 1, 1972
2400 - 2416 W. 6th St.	Plaza Park Hotel [Primary Address: 603 - 607 Parkview St.]	267	1	June 24, 1983
2820 - 2830 W. 6th St.	de Neve, Felipe Branch Library (Including the Courtyard, Terraces & Fountain Area) (Northeast corner of Lafayette Park / Vermont & Alvarado)	452	10	October 17, 1989
3451 W. 6th St.	Chapman Park Market Building	386	4	August 30, 1988
3501 - 3519 W. 6th St.	Chapman Park Studio Building	280	4	July 24, 1984
300 - 314 W. 7th St.	State Theater Building [Primary Address: 701 - 713 S. Broadway]	522	9	March 20, 1991
425 - 437 W. 7th St.	Los Angeles Athletic Club [Alternate Address: 648 - 652 Olive St.]	69	9	September 16, 1970
505 W. 7th St.	Giannini/Bank of America [Primary Address: 649 S. Olive St.]	354	9	April 26, 1988
513 - 515 W. 7th St.	Brock Jewelers/Cliftons	358	9	April 15, 1988
600 - 632 W. 7th St.	Boston Stores/J. W. Robinson's (Exterior Only) [Alternate Addresses: 703 - 719 Grand Ave., 710 - 722 S. Hope St.]	357	9	April 26, 1988
723 - 735 W. 7th St.	Roosevelt Building [Alternate Address: 650 - 652 S. Flower St.]	355	9	April 26, 1988
809 - 815 W. 7th St.	Fine Arts Building	125	9	April 17, 1974
800 - 898 W. 7th St.	Barker Brothers Building (Exterior Only) [Alternate Addresses: 709 - 715 S. Flower St., 700 - 726 S. Figueroa St.]	356	9	April 26, 1988
1602 - 1614 W. 7th St.	Young's Market (Formerly) [Alternate Address: 701 - 709 Union Ave.]	113	1	March 7, 1973
2973 - 2989 W. 7th St.	Bullock's Wilshire [Primary Address: 3050 - 3070 Wilshire Bl.]	56	10	June 5, 1968

	Address	Monument Name	Monument Number	Council District	Date Of Inclusion
555 W.	7th St. [San Pedro]	First Baptist Church of San Pedro (Facade Facing 7th Street and All Stained Glass Windows Only)	505	15	May 22, 1990
218 - 230 W.	8th St.	Tower Theater [Primary Address: 800 S. Broadway]	450	9	August 16, 1989
300 - 332 W.	8th St.	Hamburger's Dept. Store (May Company Downtown) [Primary Address: 801 - 829 S. Broadway]	459	9	October 17, 1989
2875 W.	8th St.	First Baptist Church of Los Angeles [Primary Address: 760 S. Westmoreland Ave.]	237	10	April 9, 1981
4401	8th St.	The Foy House [Primary Address: 627 - 635 Witmer St.]	8	9	September 22, 1962
5950 - 5958 W.	8th St.	Buck House [Primary Address: 805 S. Genesee Ave.]	122	4	March 20, 1974
401 - 415 W.	8th St.	Garfield Building [Alternate Address: 757 - 761 S. Hill St.]	121	9	August 22, 1973
754 - 760 E.	8th St.	Site of First African Methodist Episcopal Church [Primary Address: 801 S. Towne Ave.]	71	9	January 6, 1971
127 E.	9th St.	Harris Newmark Building (Exterior)	345	9	February 23, 1988
211 W.	9th St.	Eastern Columbia Building [Primary Address: 843 - 855 S. Broadway]	294	9	April 17, 1985
315 W.	9th St.	Coast Federal Savings Building [Alternate Address: 855 S. Hill St.]	346	9	March 11, 1988
437 W.	9th St.	Morgan House, Harbor Area YWCA	186	15	May 3, 1978
501 W.	9th St.	Embassy Auditorium & Hotel [Primary Address: 839 - 861 S. Grand Ave.]	299	9	October 4, 1985
809 - 817 W.	9th St.	Original Pantry [Primary Address: 873 - 877 S. Figueroa St.]	255	9	October 5, 1982
383	10th St. [San Pedro]	Residence	514	15	January 22, 1991
5401	10th Ave.	Institute of Musical Art [Primary Address: 3210 W. 54th St.]	344	6	February 23, 1988
146 W.	11th St.	Herald Examiner Building [Primary Address: 1111 - 1131 S. Broadway]	178	9	August 17, 1977
1851 W.	11th St.	Residence (Exterior Only)	431	1	May 5, 1989
200 - 226 E.	12th St.	Saint Joseph's Church [Burned & Demolished 9/4/83] [Alternate Addresses: 1200 - 1210 Los Angeles St., 1203 - 1215 Santee St.]	16	9	May 10, 1963
525 E.	12th St.	Cohn-Goldwater Building [Alternate Address: 1145 - 1149 San Julian St.]	119	9	August 16, 1973
1300 - 1422 E.	12th St.	Coca-Cola Building [Primary Address: 1200 - 1334 Central Ave.]	138	9	February 5, 1975
1501 W.	12th St.	Welsh Presbyterian Building [Primary Address: 1153 S. Valencia St.]	173	1	April 20, 1977
859 - 863 W.	13th St. [San Pedro]	Dodson Residence	147	15	August 17, 1975
1415 E.	14th St.	Coca-Cola Building [Primary Address: 1200 - 1334 Central Ave.]	138	9	February 5, 1975
1866 W.	14th St.	Residence [Alternate Address: 1402 Malvern Ave.]	244	1	April 30, 1981
627 - 633 W.	15th St.	Residence (moved to 826 S. Coronado St.)	167	9	November 17, 19
2749 - 2765 W.	15th St.	Pacific Bell Building	331	8	December 8, 19
303 - 311	17th St.	Young Apartments [Primary Address: 1615 - 1631 Grand Ave.]	317	9	January 7, 1987

Address	Monument Name	Monument Number	Council District	Date Of Inclusion
629 W. 18th St.	Carriage House [Primary Address: 2801 - 2803 S. Hoover St.] (this is the alternate address for the carriage house on Hoover, the Forthmann House has since been moved to 2801 - 2803 S. Hoover St)	103	9	October 4, 1972
2508 W. 18th St.	Washington-Irving Branch Library [Primary Address: 1803 S. Arlington Ave.]	307	10	June 27, 1986
575 19th St.	Residence (This is the original location of this house; it has since been moved to 1542 Beacon St.)	253	15	August 25, 1982
919 W. 20th St.	Residence (Site of) (Destroyed by Fire)	179	8	August 17, 1977
923 - 925 W. 23rd St.	Reuman, Henry J. Residence	335	1	December 18, 1987
1030 W. 23rd St.	Foster, Henry J. Residence	466	1	October 17, 1989
1035 W. 24th St.	Distributing Station #31	410	1	January 20, 1989
1001 - 1007 W. 24th St.	Durfee House [Alternate Address: 2311 Toberman Ave.]	273	1	January 4, 1984
1100 W. 24th St.	Second Baptist Church [Primary Address: 2408 - 2412 Griffith Ave.]	200	9	October 18, 1978
1941 W. 25th St.	Rindge House [Primary Address: 2247 - 2271 S. Harvard Bl.]	95	8	February 23, 1972
2152 - 2200 W. 25th St.	William Andrews Clark Memorial Library [Primary Address: 2500 - 2520 Cimarron St.]	28	10	October 9, 1964
1110 W. 27th St.	Residence [Primary Address: 2703 - 2707 S. Hoover St.]	240	8	April 9, 1981
661 W. 27th St.	Auto Club of Southern Cal. [Primary Address: 2601 S. Figueroa St.]	72	8	February 3, 1971
1154 - 1160 W. 27th St.	Harrison, John C. House	296	8	July 12, 1985
1157 - 1163 W. 27th St.	Miller & Herriott Tract House [Alternate Address: 2670 - 2676 Magnolia Ave.]	242	8	April 9, 1981
1102 - 1114 W. 28th St.	Forthmann House (was moved to this location from 629 W. 18th St.) (there is still a carriage house located at the old address) [Alternate Address: 2801 - 2803 S. Hoover St.]	103	9	October 4, 1972
700 W. 32nd St.	Shrine Auditorium [Primary Address: 647 - 655 W. Jefferson Bl.]	139	8	March 5, 1975
650 W. 36th St.	Widney Hall [U.S.C.]	70	8	December 16, 1970
37th St.	Korean Bell & Belfry of Friendship, Angel's Gate Park [Primary Address: Gaffey & 37th Sts.]	187	15	May 3, 1978
1221 - 1223 E. 40th Pl.	Bunche, Ralph J. Home	159	9	July 27, 1976
1067 42nd Pl.	Dunbar Hotel [Primary Address: 4225 - 4233 S. Central Ave.]	131	9	August 4, 1974
1201 W. 48th St.	Vermont Square Library	264	9	June 7, 1983
917 E. 49th Pl.	Residence	517	9	January 16, 1991
3210 W. 54th St.	Institute of Musical Art [Alternate Address: 5401 10th Ave.]	344	6	February 23, 1988
1100 W. 55th St.	Residence [Alternate Address: 5426 Budlong Ave.]	511	8	January 11, 1991
1157 W. 55th St.	Residence	510	8	January 11, 1991
1207 E. 55th St.	Residence	518	9	January 16, 1991
1005 W. 64th St.	Muir, John Branch Library (Destroyed by Fire: 5/92)	305	9	June 27, 1986
814 70th St.	Site of Mount Carmel High School [Primary Address: 7011 S. Hoover St.]	214	9	June 6, 1979
1686 - 1690 E. 103rd St.	Watts Station	36	15	December 3, 1965

Address		Monument Name	Monument Number	Council District	Date Of Inclusion
1711 - 1765 E.	107th St.	Towers of Simon Rodia [Watts Towers]	15	15	March 1, 1963
1711 - 1765 E.	107th St.	Watts Towers [Primary Address: 1711 - 1765 E. 107th St.] [Alternate Address: 10618 - 10626 Graham Ave.]	15	15	March 1, 1963
615 E.	108th St.	Structure	513	8	January 15, 1991

**S.S. Catalina was moved to Ensenada, Mexico on 3/3/85
 REVISED: June 3, 1992
 NF:jm
 PARADOX3\Tale HCM\Report 2:ta-wp51

Historic Preservation Element Sites
City of Glendale, California

First Order Criteria

Oak of Peace and Verdugo Adobe	2211 Bonita Drive
Casa Adobe de San Rafael	1330 Dorothy Drive
The Taylor House	1027 Glenwood
The Richardson House	1281 Mariposa Street
The Doctor's House	Brand Park
El Miradero	Brand Park
The Goode House	119 North Cedar
Egyptian Village Cafe	131-133 North Brand Bl
The Toll House	1521 North Columbus Avenue
The Southern Pacific Railroad Depot	400 Cerritos Avenue

Second Order Criteria

The Inter-Valley Ranch	Northerly terminus of Dunsmore Avenue
The Statue of Miss Green Cross	(Behind) Brand Library
The G.A.R. Meeting Hall	902 South Glendale Avenue
The Elks Club	120 East Colorado Street
The Masonic Temple	234 South Brand Bl
Glendale Y.M.C.A.	140 North Louise
Tuesday Afternoon Club	400 North Central Avenue
Security Trust and Savings Bank	100 North Brand Bl
Glendale Hotel	701-707 East Broadway
Harrower Lab	920 East Broadway
Grand Central Airport Tower	1310 Air Way
Alex Theatre	216 North Brand Bl
Holy Family Roman Catholic Church	214 East Elk
First Baptist Church	207 North Louise
First Church of Christ, Scientist	500 South Central Avenue
The Jones House	727 Kenneth Road
The Derby House	2535 East Chevy Chase Drive
The Calori House	3021 East Chevy Chase Drive
The Rodriguez House	1845 Niodrara
Homeland	1405 Mountain
The Brockman Clock Tower	(150 ft. northeast of) 1605 Arbor Road
Lorelei	330 Kempton ³ Road
The Walters House	3000 Sparr Boulevard

ATTACHMENT A

STRUCTURES DESIGNATED PURSUANT TO THE
CULVER CITY HISTORIC PRESERVATION PROGRAM

"LANDMARK" STRUCTURES*

1. 9355 Culver Boulevard (Citizen Building) **
2. 9820 Washington Boulevard (Culver Theater)
3. 9400 Culver Boulevard (Culver Hotel)
4. 5879 Washington Boulevard (King's Tropical Inn)
5. 8703-35 Washington Boulevard (Helms Building)
6. 10195 Washington Boulevard (St. Augustine's)
7. 11333 Washington Boulevard
8. 9720-30 Washington Boulevard (Washington Building) **
9. 9543 Culver Boulevard (Hull Building)
10. 4052-A LaFayette Place Res, Dist
11. 4052-B LaFayette Place Res, Dist
12. 4052-C LaFayette Place Res, Dist
13. 4058-A LaFayette Place Res, Dist
14. 4058-B LaFayette Place Res, Dist
15. 4058-C LaFayette Place Res, Dist
16. 4068-A LaFayette Place Res, Dist
17. 4068-B LaFayette Place Res, Dist
18. 4068-C LaFayette Place Res, Dist
19. 4070-A LaFayette Place Res, Dist
20. 4070-B LaFayette Place Res, Dist
21. 4070-C LaFayette Place Res, Dist
22. 4121 Wade Street Res
23. 4245 Duquesne Street Res
24. 4191 Lincoln Avenue Res

"SIGNIFICANT" STRUCTURES*

1. 3927 Van Buren Place (West End Hotel, formerly Washington Hotel)
2. Moderne School - 3430 McManus Avenue
3. 3824 Hughes Avenue (Legion Building)
4. 8695 Washington Boulevard (Beacon Laundry)
5. 10722 Washington Boulevard
6. 9050 Washington Boulevard
7. 5788-90 Washington Boulevard

"RECOGNIZED" STRUCTURES*

1. 9942 Culver Boulevard (Post Office)
2. 10858 Culver Boulevard (VFW)
3. 3832 Jasmine Avenue (Convent)
4. 3850 Jasmine Avenue (Rectory)
5. 9400-10 Washington Boulevard
6. 11300-04 Venice Boulevard

** Also listed on the Federal National Register of Historic Places

7.	12400-04 Washington Boulevard		
8.	9540 Washington Boulevard		
9.	5812 Washington Boulevard		
10.	11027 Braddock Drive	Res,	Dist
11.	11033 Braddock Drive	Res,	Dist
12.	11034 Braddock Drive	Res,	Dist
13.	11037 Braddock Drive	Res,	Dist
14.	11043 Braddock Drive	Res,	Dist
15.	11047 Braddock Drive	Res,	Dist
16.	4173 McConnell Boulevard	Res,	Dist
17.	4128 McConnell Boulevard	Res,	Dist
18.	4132 McConnell Boulevard	Res,	Dist
19.	4138 McConnell Boulevard	Res,	Dist
20.	4148 McConnell Boulevard	Res,	Dist
21.	4150 McConnell Boulevard	Res,	Dist
22.	4141 McConnell Boulevard	Res,	Dist
23.	4154 McConnell Boulevard	Res,	Dist
24.	4158 McConnell Boulevard	Res,	Dist
25.	4160 McConnell Boulevard	Res,	Dist
26.	4161 McConnell Boulevard	Res,	Dist
27.	4163-65 McConnell Boulevard	Res,	Dist
28.	4166 McConnell Boulevard	Res,	Dist
29.	4177 McConnell Boulevard	Res,	Dist
30.	4181 McConnell Boulevard	Res,	Dist
31.	4105 Lincoln Avenue	Res	
32.	3823 Girard Avenue	Res	
33.	4222 Keystone Avenue	Res	
34.	4115 Van Buren Place	Res	
35.	4117-19 Higuera Street	Res	
36.	4133-35 Duquesne Street	Res	
37.	3914-16 Huron Avenue	Res	
38.	9031-33 Krueger Street	Res	
39.	4058 Madison Avenue	Res	
40.	4058 Lincoln Avenue	Res	
41.	4210 Lincoln Avenue	Res	
42.	4122 Van Buren Place	Res	
43.	4019 Wade Street	Res	
44.	4144-46 LaFayette Place	Res	
45.	4190 Lincoln Avenue	Res	
46.	9054-56 Carson Street	Res	
47.	9034 Krueger Street	Res	
48.	9058 Carson Street	Res	
49.	4041 LaFayette Place	Res	
50.	4114 LaFayette Place	Res	
51.	4125 LaFayette Place	Res	
52.	3923 Prospect Avenue	Res	
53.	4105 Duquesne Avenue	Res	
54.	4151-53 Duquesne Street	Res	
55.	4154-56 Duquesne Street	Res	
56.	4077 Lincoln Avenue	Res	
57.	4155 Madison Avenue	Res	
58.	10412 Park Avenue	Res	
59.	10852 Wagner Street	Res	
60.	11215 Barman Avenue/4373 Tuller	Res	
61.	4214 Madison Avenue	Res	

ATTACHMENT A

- 62. 9026 Carson Street Res
- 63. 11373 Herbert Street Res
- 64. 3535 Schaefer Street Res
- 65. 4230 Irving Place Res
- 66. 4049 Madison Avenue Res
- 67. 4179-81 Madison Avenue Res
- 68. 10865 Pickford Way Res
- 69. 10834 Oregon Avenue Res

STUDIO PROPERTIES

The Culver Studios

"Landmark"

- 1. Mansion Building and Ince Appendage

"Significant"

- 1. Bungalow S
- 2. Bungalow T
- 3. Bungalow U
- 4. Bungalow V

Columbia Studios

"Landmark"

- 1. Thalberg Building
- 2. The Colonnade

"Significant"

- 1. Crawford Building (Schoolhouse)
- 2. Sound Stages 3 4, 5, 6
- 3. Jean Harlow Building (Art Deco portion)
- 4. Garland Building
- 5. Tracy Building
- 6. Hepburn Building
- 7. Myrna Loy Building
- 8. Gable Building
- 9. Commissary
- 10. Water Tower

*Note: Res = Residential
Dist = Historic District

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jk/brc



APPENDIX F

TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK	ADDRESS	CITY	IMPACTED BY CMP
Will Rodgers Mem Pk	1333 E 103rd St	Watts	
Watts Towers St His Pk	1765 E 107th St	Watts	
Carver Park	1400 E 118th St	Los Angeles	
Holly Park	2000 W 120th	Hawthorne	
Imperial Park	120th St & Yukon Av	Inglewood	
Mona	2291 E 121st St	Compton	
Pearblossom	33922 121st St E	Pearblossom	
Helen Keller	1045 W 126th St	Los Angeles	
El Segundo Park	130th St & Compton Av	Compton	
Ramona Park	137th St	Hawthorne	
Thornburg Park	2320 W 149th St	Gardena	
Memorial Park	14th Olympic	Santa Monica	
Freeman Park	2100 W 154th Pl	Gardena	
Cerritos Park East	13200 166th St	Cerritos	
Victoria Park	419 E 192nd St	Carson	
Obregon	4021 E 1st St	Los Angeles	
Zacatecas Park	1st St & Barbara Av	Azusa	
Layne Park	1st St - Fermoore St	San Fernando	
Central Playground	1357 E 22nd St	Los Angeles	
Stearns Park	4520 E 23rd St	Long Beach	
Hoover Recreation Ctr	1010 W 25th St	Los Angeles	
Evergreen Rec Center	2844 E 2nd St	Los Angeles	
Eisenhower Park	500 2nd Street	Arcadia	
Tierra Bonita	30th St	Lancaster	
McAdam Memorial Park	38115 30th St E	Palmdale	
Silverado Park	1545 W 31st St	Long Beach	
Denker Recreation Ctr	1550 W 35th Pl	Los Angeles	
Mary Hitchcock Park	4th St & Strand St	Santa Monica	
South Park	345 E 51st St	Los Angeles	
Mary McCleod Bethune	1244 E 61st St	Los Angeles	
Ramona Park	3301 E 65th St	Long Beach	
Sixth & Gladys	6th & Gladys St	Los Angeles	
Elysian Park	929 Academy Rd	Los Angeles	Yes
La Mirada Park	13701 S Adelfa Dr	La Mirada	
Allendale Park	Allendale Rd & Euclid Ave	Pasadena	
Palisades Park	851 Alma Real dr	Los Angeles	Yes
Almansor Park	Almansor Ave	Alhambra	
West Park	Alondra Bl & Wadsworth	Compton	
Eaton Canyon Park	1750 Altadena Dr	Pasadena	
Kentucky Springs Park	Angeles Forest Hwy	LA County	
Darby Park	3400 Arbor Vitae St	Inglewood	
Valley Plaza Park	12240 Archwood St	N Hollywood	Yes
Rio San Gabriel Park	9612 Ardine	Downey	
Live Oak Park	Ardmore Av	Manhattan Beach	
Val Verde Park	30300 W Arlington St	Val Verde	
Dalton Park	18867 E Armstead St	Azusa	

TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK	ADDRESS	CITY	IMPACTED BY CMP
Galster Wilderness Pk	Aroma Dr	West Covina	
Brookside Park	Arroyo Bl & Pk Rdwy A	Pasadena	Yes
Arroyo seco Park	Arroyo Dr at Pasdna Ve	Pasadena, S.	Yes
Ashwood Park	201 S Ash	Inglewood	
Atlantic Avenue Park	570 Atlantic Av	Los Angeles, E	
Gilbert Lindsay Com Ctr	4211 Avalon Blvd	Los Angeles	
Saddleback Butte St Pk	4555 W Ave G	Lancaster	
Duntley Rawley Park	Ave K at 35th Street W	Lancaster	
Palms Park	5600 Ave R	Palmdale	
Old Orchard Park	25051 N Ave Rotella	Valencia	
Carlin Smith Playgrnd	511 W Avenue 46	Los Angeles	
Apollo Park	4445 W Avenue G	Lancaster	
George Lane	5520 W Avenue L-8	Lancaster	
Antlpe Vly Indian Mus	15701 E Avenue M	Lancaster	
Babbitt Park	Babbitt & Simonds	Mission Hills	
Central Park	13200 Bailey St.	Whittier	
Echo Park	1632 Bellevue Av	Los Angeles	Yes
Thompson Park	14001 S Bellflower Bl	Bellflower	
Independence Park	12334 Bellflower Blvd	Downey	
Dominguez Park	Beryl St & 190th St	Redondo Beach	
Robert Burns Park	Beverly Bl & Van Ness Ave	Los Angeles	
Pico Park	9520 Beverly Blvd	Pico Rivera	
Grant Rea Memorial Pk	Beverly Blvd & Rea Dr	Montebello	
Holmby Park	400 Beverly Glen Drive	Los Angeles	
Irving Schachter	Beverwil Dr	Los Angeles	
Cerritos Regional Park	19700 S Bloomfield Ave	Cerritos	
Treasure Island Park	9300 Bluff Rd	Downey	
Sylmar Park	13109 Borden Av	Sylmar	
Dr Paul Carlson Mem Pk	Braddock Dr & Motor Ave	Culver City	
Branford Park	13310 Branford St	Los Angeles	
Athens Park	12603 S Broadway	Los Angeles	
Smith Park	200 W Broadway	San Gabriel	
Broadway Park	Broadway & Newlin Av	Whittier	
Belvedere Park	4914 E Brooklyn Ave	Los Angeles, E	Yes
Duarte Park	1200 Buena Vista St	Duarte	
Sepulveda Dam Rec Area	17015 Burbank Blvd	Encino	Yes
El Paseo De Cahuenga	Cahuenga & Hollywd Fry	Los Angeles	Yes
Kelly Park	2319 E Caldwell St	Compton	
Singer Park	California Bl & John Av	Pasadena	
Tournament Park	1100 California Blvd	Pasadena	
Wilderness Park	1102 Camino Real	Redondo Beach	
North Oaks Park	27824 N Camp Plenty Rd	Saugus	
General Scott Park	23410 Catskill Av	Carson	
Lynwood Park	3798 Century blvd	Lynwood	
Los Nietos Park	11143 Charlesworth Rd	Santa Fe Spgs	
Chatsworth Park	22300 Chatsworth St	Chatsworth	

TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK		ADDRESS	CITY	IMPACTED BY CMP
Granada Hills Rec Ctr	16730	Chatsworth St	Granada Hills	
Douglas Park	1155	Chelsea Av	Santa Monica	
Agoura	5217 N	Chesbro Rd	Agoura	
Simms Park	16614 S	Clark Av	Bellower	
Enterprise Park	13055	Clovis St	Los Angeles	
Otterbein St Rec Ctr	17250 E	Colima Rd	Rowlands Hts	Yes
Glendale Central Park		Colorado St & Brand Av	Glendale	
Lennox	10828	Condon Ave	Lennox	
Grant Park		Cordova St & Chester Av	Pasadena	
Ham Memorial Park	5300	Courtland Ave	Lynwood	
Charter Oak	20261 E	Covina Blvd	Covina	
Gonzales Park Com Ctr	1101 W	Cressy St	Compton	
Wattles Garden park	1850 N	Curson Av	Hollywood	
Santa Ynez		Cyn Pk & Pacific Palis	Los Angeles	
Simon Bolivar Park	3300	Del Amo Blvd	Lakewood	
Eaton Blanche Park		Del Mar Bl & Lapresda Dr	Pasadena	
Delongpre Park		Delngpre Ave & Cherkee Av	Hollywood	
Descanso Park	2500	Descanso Wy	Torrance	
Devils Punchbowl	28000	Devils Pnchbl Rd	Pearblossom	
Greystone Park	501 N	Doheny Rd	Beverly Hills	
Biscailuz Park	2601	Dollar Street	Lakewood	
Stonehurst Rec Center	9901	Dronefield Av	Sun Valley	
Whittier Narrows	1000 N	Durfee Av	S El Monte	Yes
Eaglerock Rec Center	1100	Eagle Vista Dr	Eagle Rock	
Bellevue Park		Edgecliffe & Marcia Dr	Los Angeles	
Edna Park		Edna Pl & Valencia	Covina	
Hawthorne Mem Park	3901	El Segundo Blvd	Hawthorne	
Willowbrook Park		El Segundo Blvd	LA County	
Mountain View Park	12127	Elliott Av	El Monte	
Woodbridge Park		Elmer Av & Woodbridge St	Los Angeles	
Victor Park	4727	Emerald St	Torrance	
Garvey Mem Rec Cetr	7933 E	Emerson Pl	S. San Gabvriel	
Charmles County Park		Encinal Canyon Rd	Malibu	
Griffith Park		N End Vermont Av	Los Angeles	Yes
Erwin Park		Erwin St & Ethel Av	Los Angeles	
Vasquez Rocks Park	10700 W	Escnddo Cyn Rd	Saugus	
Del Rey Lagoon	6660	Esplanade Wy	Playa Del Rey	
Everett Park		Everett St	Los Angeles	
Exposition Park		Exposition Blvd	Los Angeles	
Pasadena Central Park		Fair Oaks Av & Del Mar	Pasadena	
La Pintoresca Park	1400	Fair Oaks Ave	Pasadena	
Coombs Park		Farragut Dr	Culver City	
Valencia Meadows	25671 N	Fedala Rd	Valencia	
Malibu Community Ctr	6955	Fernhill Dr	Malibu	
Mariposa Park	45755 N	Fig Av	Lancaster	
Harbor Park	1221	Figuroa Pl	Wilmington	

TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK	ADDRESS	CITY	IMPACTED BY CMP
Sycamore Grove Park	4702 N Figueroa St	Los Angeles	
Greaver Oak Park	Figueroa St & 37th	Los Angeles	
Hansen Dam Park	11850 Foothill Blvd	Sn Ferndo Vly	Yes
Sunland Pk & Rec Ctr	8651 Foothill Blvd	Sunland	
South Hills Park	Foothill Frway	Glendora	Yes
Fresno Recreation Ctr	1016 S Fresno St	Los Angeles	
Runyon Canyon Pk	2000 Fuller Av	Los Angeles	
La Loma Park	Fulton Av & Iris Wy	Monterey Park-	
Lookout Point	Gaffey St & 35th St	San Pedro	
Westside Park	Gage Ave & Cottage St	Huntington Pk	
West Wilshire Rec Ctr	141 S Gardner St	Los Angeles	
La Puente Park	500 Glendora Ave	La Puente	
McCambridge Park	1515 N Glenoaks Blvd	Burbank	
Roosevelt	7600 Graham Av	Los Angeles	
Guenser Park	17800 S Gramercy Pl	Torrance	
Recreation Park	Granada Av	Long Beach	
Grand Av	Grand Av	Monrovia	
Pelanconi Park	1000 Grandview Av	Glendale	
Perry Park	Grant Av & Slauson Ln	Redondo Beach	
La Cienega Park	8400 Gregory Wy	Beverly Hills	
Gridley	Gridley at Bertha	Cerritos	
Gunn Ave Park	10130 S Gunn Av	Whittier •	
Crescent Hills Park	1000 Hanley Ave	Los Angeles	
Rosewood Park	5600 Harbor	Commerce	
Glenoaks Park	Harding Av - Lucas St	San Fernando	
Rancho Palos Verdes	30359 S Hawthorne Blvd	Ro Palos Verd	
City Terrace	1126 N Hazard Way	East Los Angeles	
Panorama Rec Ctr	8600 Hazeltine Av	Panorama	
Granada Park	Hellman Av & Palm Av	Alhambra	
Indian Dunes Park	28700 Henry Mayo Dr	Valencia	
Leland	863 S Herbert Av	San Pedro	
Pacoima Playground	10943 Herrick Ave	Pacoima	
Wilderness Park	Highland Vista Dr	Arcadia	
Mae Boyar Rec Ctr	23936 Highlander Rd	Canoga Park	
Baldwin Hills Plgd	5401 Highlight Pl	Los Angeles	
Barnsdall Park	4800 Hollywood Blvd	Los Angeles	
El Cariso Regional Pk	13100 Hubbard St	Sylmar	
Las Palmas Park	505 Huntington St	San Fernando	
Van Nuys Sherman Oaks	14201 Huston St	Sherman Oaks	
Hungry Vv Veh Rec Area	Hwy 5 and Hwy 138	LA County	Yes
Siminski Park	9717 Inglewood Av	Inglewood	
Del Aire	12601 S Iris Ave	Hawthorne	
Irwindale Park	5050 Irwindale Ave	Irwindale	
Orcutt Rch Horticult	23555 Justice St	Lakeside Park	
Joslyn Park Center	Kensngtn Rd& Beverly Av	Santa Monca	
Sepulveda Rec Center	8801 Kester Av	Sepulveda	

TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK	ADDRESS	CITY	IMPACTED BY CMP
El Nido Park	18301 Kingsdale Ave	Torrance	
Knapp Park	25000 Kittridges St	Canoga Park	
El Sereno Rec Ctr	4721 Klamath St	El Sereno	
Manzanita	1747 S Kwis Ave	La Puente	
Ladera Park	6027 Ladera Park Av	Los Angeles	
Lanark Rec Center	21816 Lanark St	Canoga Park	
Cameron Park	700 Larkellen Ave	West Covina	
Malibu Creeks State Pk	Las Virgenes Rd	LA County	
Tapia Co Park	884 Las Virgenes Rd	Calabasas	
Fernangeles Rec Ctr	8851 Laurel Cyn Blvd	Sun Valley	
Paxton Park & Rec Ctr	10731 Laurel Cyn Blvd	Pacoima	
Paradise Park	5006 Lee St	Torrance	
Lemon Grove Rec Ctr	4949 Lemon Grove Av	Los Angeles	
Brenner Park	Lincoln Av & Mountain St	Pasadena	
Loma Alta	3339 N Lincoln St	Altadena	
Scherer Park	4600 Long Beach Blvd	Long Beach	
Los Robles Co Park	14906 E Los Robles	Hacienda Hts	
Bell Gardens Park	6662 Loveland Street	Bell Gardens	
Madrona Mrsh Ntr Pres	22300 Madrona Av	Torrance	
Weschester Rec Ctr	7000 Manchester Av	Los Angeles	Yes
Alondra	3850 Manhattan Bch Bl	Lawndale	
Manhattan Heights Park	Manhattan Beach Blvd	Manhattan Beach	
Friends Park	13300 Mar Vista St	Whittier	
Marine Park Center	1406 Marine St	Santa Monica	
Manson Recreation Ctr	10400 Mason Street	Chatworth	
Bristow Park	1466 S McDonnell Ave	Commerce	
Lambert Park	11431 McGirk Av	El Monte	
Pasko Park	McGroarty St	Los Angeles	
McGroarty Cultural Ctr	7570 McGroarty Ter	Tujunga	
McManus Park	3459 McManus Av	Culver City	
Barnes Memorial Park	400 S McPherrin Ave	Monterey Park	
Orangewood Park	1600 Merced Ave	West Covina	
Amelia Mayberry Park	13201 E Meyer Rd	Santa Fe Spgs	
Michillinda Park	3800 Michillinda Park	Pasadena	
Rosemead Park	Mission - Encinita	Rosemead	
Garfield Park	815 S Mission Av	S. Pasadena	
Ernest E Debs Reg	4235 Monterey Rd	Los Angeles	
Lacy Park	3300 Monterey Rd	San Marino	Yes
Vickroy Park	Monterey Av & Brighton St	Burbank	
West End Park	Moore & Wade Sts	Culver City	
Moorpark Park	12000 Moorpark St	StudiosCity	
Cheviot Hills Pk & Rec	2551 Motor Ave	Los Angeles	
Rancho Park	2459 Motor Ave	Los Angeles	
Boyle Hts Sports Ctr	933 Mott St	Los Angeles	
Brand Park	1601 W Mountain St	Glendale	
Altadena Park	65 Mountain View St	Altadena	

Amended - See
ERRATA Notes

TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK	ADDRESS	CITY	IMPACTED BY CMP
Farnsworth	568 E Mt. Curve Ave	Altadena	
Houghton Park	6301 Myrtle Av	N Long Beach	
Coolidge Park	352 E Neece St	Long Beach	
Crescenta Valley	3901 New York Ave	La Crescenta	
William S Hart Park	24151 Newhall Av	Newhall	
Newhall Memorial Park	24923 N Newhall Ave	Newhall	
Billy Milford Park	Norwalk Blvd	Hawaiian Gdns	
Oak Grove Park	4550 Oak Grove Dr	Pasadena	
Reynolds Park	716 W Oldfield St	Lancaster	
Olive Avenue Park	Olive Ave	Los Angeles	
Pershing Square	532 S Olive St	Los Angeles	
Garvey Ranch Park	Orange Av & Graves Av	Monterey Park	
Rio Hondo Park	4628 S Orange St	Pico Rivera	
Carson Park	21411 S Orrick Ave	Carson	
Roger Jessup Rec Ct	12467 W Osborne St	Pacoima	
Palms Park	2950 Overland Av	Los Angeles	
Veterans Memorial Park	4117 Overland Av	Culver City	
Blanco Park	Overland Av & Stever St	Culver City	
Pacific Park	501 S Pacific Ave	Burbank	
Surfrider Bch St Pk	Pacific Coast Hwy	Malibu Beach	Yes
Palm Park	Palm Av & Floral Dr	Whittier	
Victory Park	2575 Paloma St	Pasadena	
Friendship	Palos Verdes Dr-Westrn	Ro Palos Verd	Yes
Paramount	14410 Paramount Blvd	Paramount	
Recreation Park	Park Av - 1st St	San Fernando	
Bonelli Regional CO Pk	120 Park Rd	San Dimas	Yes
Heartwell Park	5801 Parkcrest St	Long Beach	
Angels Gate Park	930 Paseo Del Mar	Los Angeles	
White Point Park	2000 Paseo Del Mar	Los Angeles	
Pat Nixon Park	Patricia Dr	Cerritos	
Fremont Park	Patterson Av	Glendale	
Peck Road Park	5401 N Peck Rd	Arcadia	
Santa Fe Dam Rec Area	200 S Peckam Rd	Azusa	
William Penn Park	13900 Penn St	Whittier	
Cypress Park	2630 Pepper	Cypress Park	
Little Lake Park	10900 Pioneer Blvd	Santa Fe Spgs.	
Pio Pico State His Pk	6003 S Pioneer blvd	Whittier	
Placerita Cyn State Pk	19150 Placerita Cyn Blvd	Newhall	
El Dorado	Pondera St & 5th St	Lancaster	
Rogers-Anderson Pk	Prairie Av	Lawndale	
Palm View Park	1300 Puente Av	West Covina	
Saxonia Park	Quigley & Cleardale	Newhall	
Morgan Park	14100 Ramona Blvd	Baldwin Park	
Carthay Circle Park	Ramona Wy & Foster Dr	Los Angeles	
Northridge Rec Ctr	10058 Reseda Blvd	Northridge	
Lindberg Park	Rhoda Wy & Studio Dr	Culver City	

TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK		ADDRESS	CITY	IMPACTED BY CMP
Sequoia Park		Ridge Crest-Crest Vista	Monterey Park	
Castaic Lake State Rec	32100	Ridge Route	Castaic	
Rimgrove Dr	747 N	Rimgrove Drive	La Puente	
Cultural Art Center	3224	Riverside Drive	Los Angeles	
Furman Park	10419	Rives Av	Downey	
Apollo Park	12458	Rives Ave	Downey	
Blair Hills Park		Robstone Drive	Culver City	
Ro Cienega Sport Ctr	5001	Rodeo Rd	Los Angeles	
Lueders Park Comm Ctr	1500	Rosecrans Ave	Compton	
Sorensen	11419	Rosehedge Dr	Whittier	
Two Strike Park	5107	Rosemont Av	La Crescenta	
Roxbury Rec Center	471 S	Roxbury Dr	Beverly Hills	
Runnymede Rec Ctr		Runnymede St & Winntka Av	Los Angeles	
Studio City Rec Ctr	12621	Rye St	Studio City	
Bixby Knolls Park	1000	San Antonio Dr	Long Beach	
Los Cerritos Park	500 W	San Antonio Dr	Long Beach	
Bicentennial Park	3400	San Gabriel Pkwy	Pico Rivera	Yes
Ardmore Playground	3250	San Marino St	Los Angeles	
West Hollywood Park	647 N	San Vicente Blvd	W Hollywood	
Cudahy Neighborhood Pk	5200	Santa Ana St	Cudahy	
Arcadia County Park	405 S	Santa Anita Ave	Arcadia	
Dominguez	21330 S	Santa Fe Av	Carson	
South Park		Santa Fe Av & Johnson St	Compton	
Topanga State Park		Santa Monica Mountains	Los Angeles	Yes
Rustic Canyon Park		Santa Monica Mtns	Los Angeles	
Veterans Memorial Park	13000	Sayer St	Sylmar	
Brace Canyon		Scott Rd & Lamer St	Burbank	
Ford Regional Co Park	8000 S	Scout Av	Bell Gardens	
Santa Clarita	27285 N	Seco Canyon Rd	Saugus	
Andreas Pico Adobe	10940	Sepulveda Blvd	Mission Hills	
Woodland Hills Rec Ctr	5858	Shoup Ave	Woodland Hills	
Brand Park	15174	Sn Frndo MSN Bl	Mission Hills	
Verdugo Mountain park		So of La Tuna Cayn Rd	Los Angeles	
South Gardena Park		South Park Ln	Gardena	
South Gate Park	4900	Southern Ave	South Gate	
El Dorado Nature Ctr	7550 E	Spring St	Long Beach	
Hollenbeck Park	415 S	St Louis St	Los Angeles	Yes
Campanella	14812	Standford Ave	Compton	
Marshall Cyn County Pk	6550	Stephens Ranch Rd	La Verne	
Stimson Av Park	1545 S	Stimson Av	La Puente	
Strathern Plgd		Strathrn St & Whtsett Av	Los Angeles	
El Dorado	2760	Studebaker Rd	Long Beach	
William S Hart Park		Sunset Bl & Flores St	Los Angeles	
Will Rogers St His Pk	14253	Sunset Blvd	Pac Palisades	
El Pueblo D Ls Angeles		Sunset Blvd & Broadway	Los Angeles	Yes

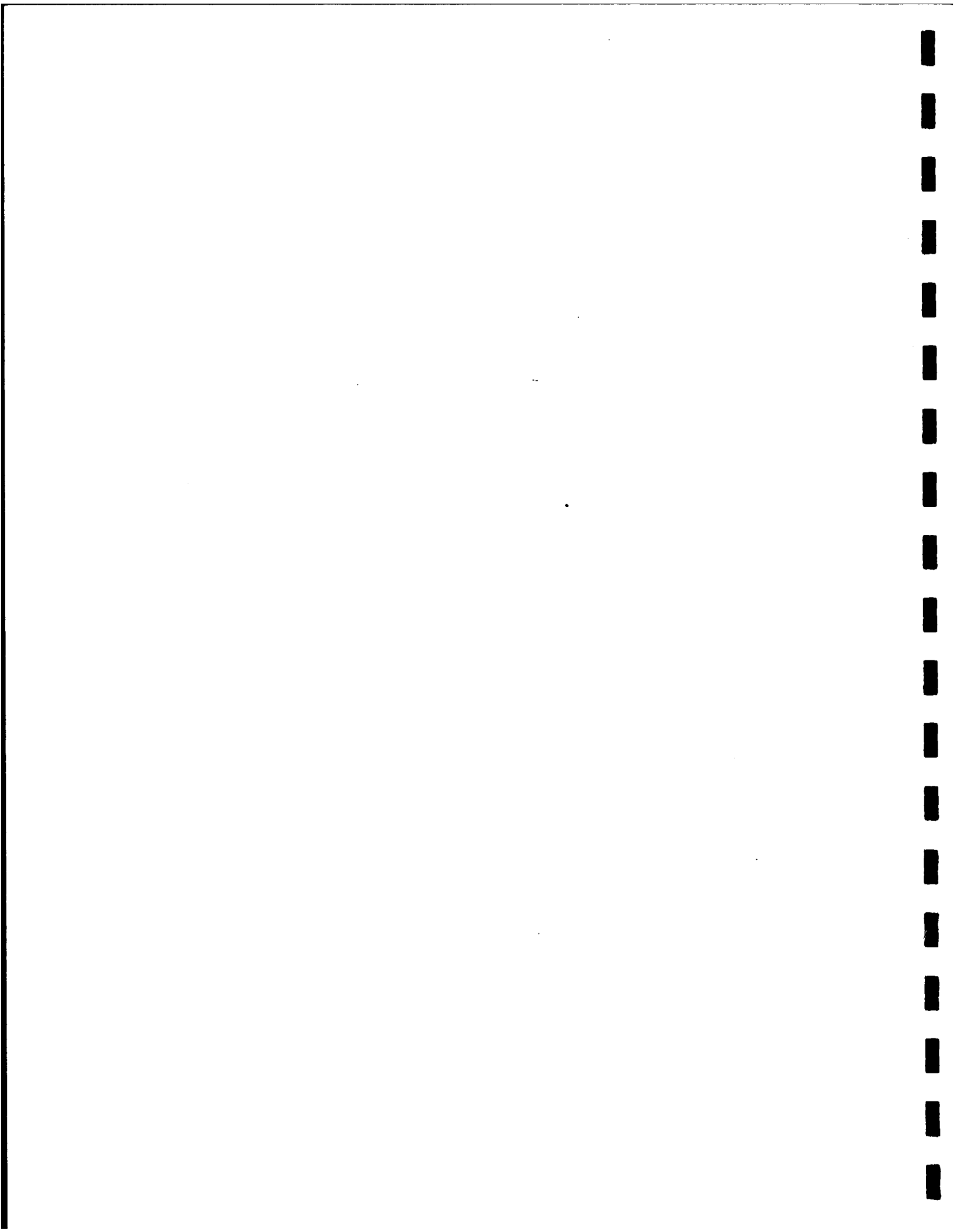
TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK	ADDRESS	CITY	IMPACTED BY CMP
The Plaza	Sunset Blvd & Main St	Los Angeles	
San Dimas Canyon	1512 N Sycamore Cyn Rd	San Dimas	
Porter Ranch Park	Tampa Av & Tunney Av	Northridge	
Toberman Plgd	1725 Toberman St	Los Angeles	
Warner Ranch Park	5800 Topanga Cyn Blvd	Los Angeles	Yes
Dexter	11053 N Trail Lkvw Terr	San Fernando	
Trinity Rec Center	2415 Trinity St	Los Angeles	
North Hollywood Park	5301 Tujunga Ave	N Hollywood	
Lincoln Park	3501 Valley Blvd	Los Angeles	
Castle Peak Park	Valley Circle Blvd	Los Angeles	
Omelveny Park	Van Gogh & Sesnon	Los Angeles	
Rowley Park	13220 Van Ness Av	Gardena	
Van Ness Park	Van Ness Av & 135th St	Gardena	
Tarzana Park	5665 Vanalden Av	Tarzana	
Shadow Ranch Park	22633 Vanowen St	Canoga Park	
Van Nuys Rec Ctr	14301 Vanowen St	Van Nuys	
Los Encinos St Hist Pk	Ventura Bl	Los Angeles	Yes
Verdugo Park	3201 W Verdugo Av	Burbank	
Verdugo Park	1401 N Verdugo Rd	Glendale	
Valencia Glen	23750 Via Gavola	Valencia	
Reseda Park & Rec Ctr	18411 Victory Blvd	Reseda	Yes
Vincent Park	600 Vincent St	Redondo Beach	
Bassett Park	510 N Vineland Ave	La Puente	
Plummer	1200 N Vista St	Los Angeles	
Weddington Park	Vlyheart & Hollywd Fry	Los Angeles	Yes
Wabash Rec Center	2765 Wabash Av	Los Angeles	
Stough Park	Walnut Av	Burbank	
Pasadena Memorial Park	Walnut St & Raymond Av	Pasadena	
Lee Ware park	Wardham Av	Hawaiian Gdns	
Centinela Park	700 Warren Ln	Inglewood	
Washington Park	600 Washington blvd	Pasadena	
Municipal Park	Wells & Ramona	San Gabriel	
Queen Anne Rec Ctr	1240 West Blvd	Los Angeles	
Peck Park & Rec Ctr	560 N Western Av	San Pedro	Yes
Jesse Owens Co Park	9637 S Western Ave	Los Angeles	
Montebello Park	Whittier Bl & Park Av	Montebello	Yes
Salazar Park	3864 Whittier Blvd	E Los Angeles	
George E Elder	1950 Wilcox Av	Monterey Park	
Lincoln Park	Wilshire & Lincoln	Santa Monica	Yes
Hancock Park	5801 Wilshire Blvd	Los Angeles	Yes
MaCarthur Park	Wilshire Blvd	Los Angeles	Yes
Winnetka Rec Ctr	8401 Winnetka Av	Canoga Park	
Woodley Av Park	6350 Woodley Av	Van Nuys	
Rosemary Playground	Yosemite Dr	Eagle Rock	
Bodger Park	14900 S Yukon Av	Hawthorne	
Zelzah Park	Zelzah Av & Lerdo Av	Los Angeles	

TABLE F-1: PARKS IN LOS ANGELES COUNTY

PARK	ADDRESS	CITY	IMPACTED BY CMP
Veterans Memorial Park	6364 Zindell Av	Commerce	

SOURCE: Environmental Science Associates, Inc., Thomas Guide



APPENDIX G

Final
April 4, 1991

Southern California Association of Governments' Regional Consistency and Compatibility Criteria for CMPs

Changes to the Government Code, enacted with the passage of Proposition 111 in June 1990, require SCAG to perform the following evaluations for the Congestion Management Programs (CMPs) developed within the region:

- o consistency between the countywide model/databases and SCAG's regional model and databases;
- o consistency with the regional transportation plans;
- o compatibility with the other CMPs developed within the region; and
- o incorporation of the CMP into the Regional Transportation Improvement Program (RTIP) and the action element of the regional transportation plan, SCAG's Regional Mobility Plan or RMP.

According to the California Government Code, Section 11349, "consistency means being in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or other provisions of law". For purposes of this document, consistency would be applied as it relates to the regional transportation plans and the regional model and databases.

This document outlines the process and criteria that will be used in making these evaluations. This is a "working" document which may be updated periodically to address issues as they arise and in response to various State and federal mandates.

THE EVALUATION PROCESS

The CMP must be evaluated to determine that it is consistent with the Regional Mobility Plan (RMP). Since the RMP incorporates elements of the the Regional Growth Management Plan (GMP) and the Air Quality Management Plans (AQMPs) for each air basin in the region, these elements must also be included in this evaluation.

It should be noted that this process needs to acknowledge the air quality conformity requirements for the RTIP. Each county transportation commission is responsible for evaluating their respective county TIP using the appropriate conformity procedures for projects, programs and plans. SCAG, as the designated metropolitan planning organization (MPO), is responsible for the full conformity finding on the RTIP.

The evaluation consists of three parts:

Part 1: The CMP must be consistent with the actions and programs pertaining to growth management, transportation demand management, transportation systems management, and facilities development contained in the RMP and the appropriate AQMP.

Note: In the case that the Congestion Management Agency (CMA) is not an implementing agency¹ for an RMP action, the following apply:

- 1) CMP guidelines must support and encourage adoption of these measures by the appropriate agencies, and
- 2) the CMP database/modeling must be consistent with SCAG's regional model and database (see Part 2).

Part 2: The CMP must demonstrate progress toward the regional mobility targets contained in the RMP. To satisfy this requirement, the countywide modeling for the CMP must be consistent with SCAG's CMP planning horizon forecasts for the following indicators:

- a. Vehicle miles of travel, average trip length, and vehicle hours of travel must be maintained or reduced.
- b. Transit trips and average vehicle occupancy must be maintained or increased.
- c. Total person trips and total vehicle trips both within and between counties.

These CMP planning horizon targets will be developed by SCAG cooperatively with the CMAs and other interested agencies and will incorporate other applicable State and federal requirements. If a discrepancy is identified between SCAG's forecast for the CMP planning horizon and the forecast provided by the CMA, SCAG's Regional Modeling Task Force and Regional Information Task Force will be consulted regarding the reason for the discrepancy. Task force recommendations will be integrated into the consistency evaluation provided to SCAG's policy committees and Executive Committee for approval.

1. "Implementing Agency", as applied in this context, refers to the agency identified in the Regional Mobility Plan or the appropriate AQMP as having a role in an action or measure contained in these plans, including planning, programming, administration, finance, construction, operation, maintenance, or monitoring.

The CMAs may rely on travel demand forecasts produced by SCAG to develop the CMP. The following criteria apply when a separate model run and/or database are used to develop the CMP and evaluate traffic impacts of land use decisions on the CMP highway system:

Database

The CMA must cooperatively develop the CMP planning horizon forecasts of population, housing and employment with local jurisdictions. These forecasts must be consistent with local General Plans. SCAG will evaluate the CMA forecast for consistency. Staff recommendations to align the forecasts will need the approval of SCAG's policy committees and ultimately the Executive Committee. If necessary, a process for reconciling the databases will be undertaken between SCAG staff and staff representatives of the CMA and will produce a forecast that will be the basis of planning applications for both SCAG and the CMA.

Modeling

The CMA must participate in an on-going regional model and database program through SCAG's Regional Information Task Force and SCAG's Regional Modeling Task Force. This program is designed to improve consistency between regional and county-level model development in the region. To support this cooperative process, the CMA must meet the following requirements:

- a. The CMP planning horizon must be consistent with that agreed upon within the region.
- b. CMP traffic analysis zones must be compatible with census tracts or SCAG's traffic analysis zones.
- c. The CMP model must produce, at a minimum, a vehicle trip production and attraction table by at least three trip types (home-based work, home-based nonwork, and nonhome-based).
- d. The CMP modeling network must contain, at a minimum, the SCAG's System of Regional Significance which is contained in the RMP.

Part 3: To ensure compatibility between the CMPs within the region in evaluating the impacts of land use decisions on the CMP highway system and for monitoring level of service, the CMP must meet the following requirements:

- a. The CMP transportation system must connect to the system designated in (the) adjacent counties(y).
- b. Traffic level of service must be assessed using either Circular 212, the 1985 Highway Capacity Manual or a method that SCAG has found consistent with the 1985 Highway Capacity Manual.

RMP AMENDMENTS

Because the CMP process is intended to provide greater detail in the short-range action element of the RMP, differences may arise. The RMP amendment process² provides some flexibility to the CMAs in addressing the CMP requirements. This process would be used to evaluate a project or a program to determine whether the project or program is a refinement, i.e. an addendum, to the RMP, or would be treated as an RMP amendment. Before an RMP amendment can be adopted by SCAG, the project or program must satisfy these requirements.