1993 UPDATE

LOS ANGELES COUNTY

CONGESTION MANAGEMENT PROGRAM

Draft
Environmental Impact Report
July 1993

SCH No. 93051061
SCAG Clearing House No. I9300263

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TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

PROJECT DESCRIPTION

The following Environmental Impact Report (EIR) analyzes the potential of the 1993 Congestion Management Program (CMP) Update for Los Angeles County to create significant environmental impacts.[1] The 1993 CMP Update is the first update of the CMP for Los Angeles County.[2] A key component of the 1993 Update is the addition of a deficiency plan approach. Deficiency plan requirements were not specifically addressed in the 1992 CMP, pending the completion of planning and feasibility studies regarding the development of a countywide approach to deficiency planning. Since the deficiency plan component represents a substantial addition to the program, and because of the concerns of local jurisdictions, expressed during the development of the 1992 CMP, over the potential impacts of deficiency planning, this subsequent EIR has been prepared to assess the potential of the 1993 Update to create significant environmental impacts. The Los Angeles County Metropolitan Transportation Authority (MTA) is the Lead Agency for the EIR. The MTA Board will use this EIR in its review prior to adopting the 1993 CMP Update..

The 1993 CMP Update includes the following proposed modifications to the 1992 CMP, and informational updates:[3]

1993 Highway and Transit Monitoring Data - The 1992 CMP produced the first consistent, multi-jurisdictional analysis of traffic congestion throughout the County. The 1993 CMP provides comparable data and identifies changes in congestion levels over the past year. Transit frequency and routing data are also being compiled through information provided by transit operators as part of the Short Range Transit Plan (SRTP).

Additions to the CMP Highway and Roadway System - The 1992 CMP established a mechanism for adding routes through the biennial CMP update. In January 1993, local jurisdictions were asked to nominate routes that they would like considered for addition to the CMP system. The CMP Policy Advisory

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[1]Appendix A contains a listing of all acronyms contained in this EIR and their meaning.

[2]Statute requires preparation of biennial updates to the CMP.

[3]The *1993 CMP* is herein incorporated by reference. Portions of the 1993 CMP are summarized in relevant sections of this EIR. The full text of the 1993 CMP is available for review at the offices of the MTA located at: 818 West Seventh Street, Los Angeles, California 90017.

Committee (PAC) discussed nominated routes in great detail in March and April 1992. As a result of this discussion, the PAC recommended that La Cienega Boulevard between the Santa Monica Freeway (I-10) and the San Diego Freeway (I-405) be added to the system.

Refinement of the Land Use Analysis Program - The 1992 CMP established guidelines for analyzing the impacts of new development on the regional transportation system, through existing CEQA requirements. These guidelines included technical procedures for analyzing the impacts of individual development projects at CMP intersections and freeway segments.

Through implementation, CMP staff has found that a brief supplement to these guidelines would allow for the analysis of longer range and more generalized development programs such as local general plans and community plans. By allowing the analysis of these plans to focus on CMP street segment analysis rather than intersections, comparable evaluation of regional impacts and mitigation measures can be provided. This supplement is intended: to improve the effectiveness of the land use analysis program at capturing cumulative development impacts, while permitting more generalized technical evaluation in keeping with the programmatic nature of general plans; and to minimize administrative costs.

Update of the Capital Improvement Program - State programming statutes require that projects competing for State Flexible Congestion Relief (FCR) funds be included in the CMP, and that projects competing for Traffic System Management (TSM) funds be consistent with the CMP. 1992 CMP monitoring data and analysis have been integrated into the MTA's Multi-Year Call for Projects, and were used in evaluating the regional significance of project applications. Those projects that were recommended for State funding are incorporated into the 1993 CMP Capital Improvement Program.

Deficiency Plan Procedures - Statute requires preparation of deficiency plans when highway conditions worsen below LOS standards. The purpose of the deficiency plan is to implement strategies that either fully mitigate congestion or provide measurable improvement to congestion and air quality. The contents of a deficiency plan are specified in statute, as are guidelines for the determination of deficiencies and the agencies that must be consulted.

In March 1992, a workshop was held to discuss CMP deficiency plan requirements. In response to previous Commission direction, staff reported on various CMP deficiency plan alternatives. Based on extensive testimony, Commission directed staff to develop a coordinated, countywide approach to meet

deficiency plan responsibilities. As described more fully in Chapter II of this EIR, the deficiency plan approach includes: a program for assigning deficiency points to jurisdictions based on local land use decisions and their contribution of trips to the CMP network; a Tool Box of mitigation strategies, and associated mitigation point values, which local jurisdictions can use to mitigate the impacts of local land use decisions on the CMP network; and the specification of deficiency plan reporting procedures. The proposed deficiency plan Tool Box includes land use strategies, capital improvements, transportation systems management, and demand management methods of mitigation.

ENVIRONMENTAL ANALYSIS

The major environmenal 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.

ALTERNATIVES TO THE PROJECT

This EIR looks at alternatives to the proposed 1993 CMP Update. Specifically this analysis focuses on alternatives to the proposed deficiency plan strategy. The five alternatives analyzed are as follows:

Alternative 1 - The No-Project Alternative (No Deficiency Plan Addition)
Alternative 2 - The No-Countywide Deficiency Plan Alternative
Alternative 3 - The Countywide Fee Alternative
Alternative 4 - The Monitoring-Based Approach Alternative
Alternative 5 - The Modified Tool Box - Hot Spot Reducing Approach Alternative

Alternative 1 is the California Environmental Quality Act (CEQA) mandated No-Project Alternative.[4] Alternatives 2, 3, and 4 are alternatives which were seriously considered by the Los Angeles County Metropolitan Transportation Authority (MTA), but rejected because they did not meet the MTA's goals and objectives in adopting a deficiency plan component of the CMP. Alternative 5 has been developed with the intent of reducing one of the few significant impacts identified for the 1993 CMP Update, hot spot air quality impacts.

[4]See CEQA Guidelines, Section 15126, subd. (d)(2).

TABLE S-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
TRANSPORTATION		
The 1993 CMP Update is designed to be consistent with the Regional Mobility Plan (RMP)	None Required	Significant Beneficial Impact
The proposed program would result in between 202 million and 205 million vehicle miles of travel (VMT), 7.1 million and 7.3 million vehicle hours of travel (VHT) and 2.45 million and 2.46 million hours of delay on the regional transportation system compared to 202 million VMT, 7.3 million VHT and 2.52 million hours of delay under year 2010 baseline conditions. Actual program effects are anticipated to be in the middle portion of the range indicated due to selection of a mix of demand reducing and capacity increasing strategies on a countywide basis.	None Required	Significant Beneficial Impact
AIR QUALITY		
There may be localized adverse affects including the affects of facility construction, realignment of facilities near sensitive and uses, and the creation of "hot spots" near transit centers/stations and/or park and ride lots. These are highly localized adverse impacts of otherwise beneficial improvements.	3.3.1 - The MTA will develop its Tool Box in consultation with SCAG and the SCAQMD to ensure air quality goals are addressed.	Significant Localized Adverse Impact

TABLE S-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
Air quality emissions (in tons per day) would be between 584 and 597 for Carbon Monoxide (CO), 38 for Reactive Organic Gas (ROG), 86 and 88 for Nitrogen Dioxide (NOX), 36 for particulates (PM10), and 20 for Sulfur Dioxide (SOX), compared to 590 tons per day of CO, 38 of ROG, 87 of NOX, 36 of PM10, and 20 of SOX under year 2010 baseline conditions. Actual program effects are anticipated to be in the middle portion of the range indicated due to selection of a mix of demand reducing and capacity increasing strategies on a countywide basis.	None Required	Significant Beneficial Impact
ENERGY		
Fuel consumption (in millions of gallons) would be between 7.6 million and 7.8 million gallons compared to 7.7 million gallons without the proposed program. Actual program effects are anticipated to be in the middle portion of the range indicated due to selection of a mix of demand reducing and capacity increasing strategies on a countywide basis.	None Required	Beneficial Impact
In addition the proposed program would result in a shift toward high occupancy modes.	None Required	Beneficial Impact

TABLE S-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
The project may result in an increase in fuel consumption in and around transit stations or park and ride lots due to increased localized traffic delays and reduced speeds at these centers.	None Required	Not Significant
Construction of capital projects would result in a short-term consumption of energy.	None Required	Not Significant
LAND USE		
The proposed program will not systematically result in a land use pattern which is substantially different than the adopted regional forecast of which is systematically different that market patterns.	3.5.1 -In order to ensure that the CMP is contributing to achieving the objectives of the GMP, the MTA shall evaluate the growth patterns and determine whether CMP Tool Box choices have a significant correlation to the changes in land use patterns in the County, if any, after the Deficiency Plan Program has been in place for 5 years.	Not Significant
The proposed program may result in a localized redistribution of development in the form of greater densification of transit corridors and/or station areas.	None Required	Beneficial Impact
PUBLIC SERVICES		
The proposed program will help to maintain or improve emergency vehicle response times.	None Required	Beneficial Impact

TABLE S-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
Although the proposed program will impose additional administrative requirements on local jurisdictions, these administrative "costs" are more than offset by the return in administrative time invested, that the jurisdiction will receive in the form of revenue eligibility and service production efficiencies.	None Required	Not Significant
There appear to be sufficient funding mechanisms and mitigation options available for local jurisdictions to meet their deficiency mitigation obligations while avoiding the use of general funds, or diversion of funds from the provision of other public services.	3.6.1 -The MTA shall continue to work on both a state and regional level to integrate CMP deficiency plan reporting requirements with the reporting requirements associated with the AQMP in order to reduce the administrative effort required by local jurisdictions. 3.6.2 - The MTA shall allow local jurisdictions to carry-over from year to year any surplus credit points accumulated. 3.6.3 - The MTA, as part of the biennial updates to the CMP, shall investigate adding additional measures to the Tool Box.	Not Significant

1 The No-Project Alternative (No Deficiency Plan Addition)

Under this alternative, no deficiency plan component would be added to the CMP and the MTA would not review and approve any deficiency plans generated by local jurisdictions. The existing adopted CMP would remain in place. The lack of a deficiency plan mechanism would result in local jurisdictions losing their Section 2105 monies, losing their ability to compete for state funding through the State Transportation Improvement Program (STIP), and the loss of federal funds linked to compliance with the CMP. The net result would be no change in the existing transportation system. None of the programmed improvements would be built. This alternative would have the same impacts as the No-Project (Existing System) Alternative discussed in the 1992 CMP EIR.

This alternative would not comply with the requirements of the CMP statute since there would be no deficiency plan component incorporated in the CMP by the time deficiencies are identified on the CMP network. This alternative would fail to fulfill the aims of the CMP legislation and would be inconsistent with the RMP. It is, therefore, not considered feasible.

2 The No-Countywide Deficiency Plan Alternative

Under this alternative no uniform Countywide approach to deficiency planning would be adopted. Instead, the CMP Update would specify the general content of deficiency plans, and local jurisdictions would be left to develop their plans individually. Local jurisdictions would also be responsible for determining the degree to which mitigations result in an improvement in deficiency conditions. Plans would then be submitted to the MTA for review and approval.

Under this alternative, local jurisdictions would be held responsible for mitigating any deficiencies identified on portions of the network within their jurisdiction, regardless of the degree to which they contributed to the creation of the deficiency, since no method for sharing responsibility for deficiency creation would be in place. Jurisdictions on portions of the network serving as key connectors between portions of the County would be unfairly burdened with the responsibility for mitigating deficiencies on these segments. Imposition of additional TDM requirements within the impacted jurisdiction may have little impact on curing a deficiency, since the deficiency may be largely the result of trips originating and terminating in other jurisdictions. This would mean that deficiency mitigation would primarily take the form of capacity enhancements, which have less environmental

benefit than trip reduction approaches, as a general rule.[5] Local jurisdictions on heavily traveled portions of the network would thus have the burden of major capital improvements. Jurisdictions faced with mitigation costs which exceeded the funds available to the jurisdiction from public or private sources could potentially choose to not participated in the CMP and thus lose their Section 2105 funding, their ability to complete for state funding through the STIP, and all federal funds that are linked to compliance with the CMP.

This alternative does not meet the MTA's deficiency plan goals and objectives regarding provision of a Countywide approach, minimization of administrative costs, consistency among jurisdictions, sensitivity to the economy or jobs, or promotion of inter-jurisdictional mitigation. It is unclear the degree to which the alternative meets the MTA's remaining goals of effectiveness and flexibility of actions or transit enhancing land use. Therefore, this alternative was rejected by the MTA.

3 The Countywide Fee Alternative

The Countywide Fee Alternative received extensive investigation, prior to rejection by the MTA Board, as part of the development of the adopted CMP. Under this alternative, a Countywide traffic impact fee would be imposed on new development. It would be established based on a nexus study which would establish the casual connection between the creation of deficiencies on the network and development activity. The fee would be used to fund capacity enhancements on the regional network.

This alternative was rejected by the MTA because it met fewer of the MTA's deficiency plan goals and objectives than the proposed program. Specifically, it did not provide the deficiency mitigation and funding flexibility of the proposed program, the sensitivity to the economy or jobs, or the transit-enhancing land use effects. It does meet the MTA's goals regarding a Countywide approach, minimization of administrative costs, consistency among jurisdictions, and the promotion of inter-jurisdictional mitigation.

4 The Monitoring Based Approach Alternative

Under this alternative, the MTA would not provide a mitigation Tool Box. Instead, each local jurisdiction would select their own mitigation measures, monitor their

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[5]Please see the discussion of the capacity enhancement and trip reduction scenarios used to bracket the range of impacts of the proposed program. This discussion is contained in Sections 3.2, 3.3, and 3.4 of this EIR.

effectiveness, and get credit based on the demonstrated effectiveness of their mitigation measures.

Local jurisdictions would still be responsible for calculating and mitigating the effects of development within their boundaries. The impacts of new development activity would still be calculated according to formulas prepared by the MTA staff and used countywide. However, rather than using the standardized list of options for mitigation credits, where the benefits have been prequantified by the MTA staff, each local jurisdiction would implement its own measures and, through monitoring, determine their effectiveness in reducing the impacts of new development. The monitoring results would be submitted to the MTA for their evaluation. This alternative would add a strong element of uncertainty to the process of compliance with the CMP.

This alternative was rejected by the MTA because of the administrative cost to local jurisdictions and the MTA, and because it did not meet the MTA's goals and objectives regarding transit enhancing land use, effectiveness and flexibility of actions, sensitivity to the economy and jobs, and consistency and fairness among communities and developments.

5 The Modified Tool Box - Hot Spot Reducing Approach Alternative

Under this alternative, those Tool Box measures which are likely to result in air quality hot spots would be eliminated from the Tool Box. Strategies targeted for removal would include: land use strategies which result in an intensification of land use; rideshare support facilities such as passenger loading areas for carpools; capital improvements such as park and ride lots, transit and goods movement facilities, High Occupancy Vehicle (HOV) lanes and general use highway lanes; and some transportation systems management improvements, such as, potentially some intersection modifications.

This alternative would provide less flexibility of action than under the proposed program. It may be difficult to achieve the MTA's goals and objectives regarding the promotion of transit enhancing land uses, and this alternative may not be fully found inconsistent with the RMP. Given the number of strategies which could product hot spots, this alternative is unlikely to meet the CMP statute's requirement to measurably improve congestion and air quality.

6 The Environmentally Superior Alternative

Alternative 5, the Hot Spot Reducing Approach will have less air quality hot spot creating impacts than the proposed program. However, regional air quality

impacts may be greater if the Alternative is found inconsistent with the RMP. By providing for fewer Tool Box measures, the alternative will make it more difficult for local jurisdictions to meet their deficiency mitigation obligations. This may result in greater public service impacts than the proposed program. This alternative is, therefore, not clearly environmentally superior to the proposed program. It would be clearly inferior to the proposed program if found inconsistent with the RMP.

In addition, this alternative would be less able to meet the MTA's deficiency plan approach goals and objectives. It would provide less flexibility of action than under the proposed program and it may be difficult to achieve the MTA's goals and objectives regarding the promotion of transit enhancing land uses.

The other alternatives are clearly inferior to the proposed 1993 CMP Update deficiency plan approach. Alternative 1, the No-Project Alternative, would have negative transportation, air quality, energy, land use, and public service impacts. Alternative 2, the No-Countywide Deficiency Plan Approach Alternative, would have less air quality and energy benefits than the proposed program and it could have negative transportation, land use, and public service impacts. Alternative 3, the Countywide Fee Alternative, would have less transportation, air quality, and energy benefits than the proposed program, and could have land use impacts. Public service effects may be less than under the proposed program, however, Alternative 4, the Monitoring Based Approach Alternative, would have less transportation, air quality, and energy benefits than the proposed program. It would encourage less densification around transit stations and it would result in significant public service impacts.

Therefore, the proposed project is environmentally superior to the project alternatives.

I. INTRODUCTION

The following Environmental Impact Report (EIR) analyzes the potential of the 1993 Congestion Management Program (CMP) Update for Los Angeles County to create significant environmental impacts.[1] The 1993 CMP Update is the first update of the CMP for Los Angeles County.[2] A key component of the 1993 Update is the addition of a deficiency plan approach. Deficiency plan requirements were not specifically addressed in the 1992 CMP, pending the completion of planning and feasibility studies regarding the development of a countywide approach to deficiency planning. Since the deficiency plan component represents a substantial addition to the program, and because of the concerns of local jurisdictions, expressed during the development of the 1992 CMP, over the potential impacts of deficiency planning, this subsequent EIR has been prepared to assess the potential of the 1993 Update 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 CMP program changes contained in the 1993 CMP Update, and recommends a set of measures to mitigate any potentially significant adverse impacts identified in the EIR.

The Los Angeles County Metropolitan Transportation Authority (MTA), the Lead Agency for the EIR, will use this EIR in their review and consideration of the adoption of the 1993 CMP Update.[3] As explained more fully in section 1.3 below, this Subsequent Program EIR is tiered from the EIR for the 1992 CMP and the EIR

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[1]Appendix A contains a listing of all acronyms contained in this EIR and their meaning.

[2]Statute requires preparation of biennial updates to the CMP.

[3]Assembly Bill 152, signed by Governor Pete Wilson on May 19, 1992, merged the Los Angeles County Transportation Commission (LACTC) and the Southern California Rapid Transit District (SCRTD) into the new Los Angeles County Metropolitan Transportation Authority (MTA). Effective February 1, 1993, the new MTA assumed responsibility for all programs and services previously provided by LACTC and SCRTD. Among these will be the responsibilities of the Congestion Management Agency and the implementation and administration of the CMP. Therefore, the new MTA is the Lead Agency for preparation of this EIR.

for the Regional Mobility Plan (RMP). These two EIRs are incorporated herein by reference.[4]

1.1 THE 1992 CMP

In November 1992, the MTA adopted the first CMP for Los Angeles County and certified the accompanying Final Environmental Impact Report for the program. Because the CMP was a new program, the MTA adopted a first year CMP that was designed to meet the basic legislative requirements for a CMP and to establish a countywide planning framework for addressing congestion on the regional transportation network. Government Code Section 65089 (b) requires that each CMP contain the following elements:

1. An element designating the CMP transportation system and establishing Level of Services (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 within 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 7-year Capital Improvement Program (CIP) to maintain or improve the traffic and transit standards or to mitigate the impact of new development.

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[4]*Los Angeles County Congestion Management Program Final Environmental Impact Report*, November 1992 (SCH NO. 91121062; SCAG Clearing House #LA55791-MT); *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. Portions of the CMP and RMP EIRs are summarized in relevant sections of this EIR. All three of these documents are available for review at the offices of the MTA, located at: 818 West Seventh Street, Los Angeles, California 90017.

The adopted 1992 CMP for Los Angeles County approached each of the elements required by CMP Statute as follows:

Highway System - The 1992 CMP designated 1,000 miles of freeways, state highways, and roads as the CMP system in Los Angeles County. It established procedures for measuring over time the effectiveness of the CMP in terms of LOS on the CMP system. LOS are rated from "A" (free-flow) to "F" (heaviest congestion). One of the objectives of the adopted CMP is to maintain this system at LOS "E", or to prevent further degradation on portions already at "F".

During the spring of 1992, traffic volumes were measured to establish the base year LOS. This base year monitoring provided the first uniform countywide picture of how the transportation system in the County is operating. The adopted CMP provides for local jurisdictions and Caltrans to take these measurements annually to help track changes in travel patterns, determine the impact of growth on countywide mobility, and determine the effect of transportation improvements.

Transit Standards - The 1992 CMP designated a transit monitoring network comprised of transit routes running on, or parallel to, the CMP highway system. Under the CMP, information is gathered annually about passenger volumes, seat capacity, and travel speed in broad transit corridors to provide a picture of how transit assists in relieving congestion and where transit will be needed in the future.

Transportation Demand Management (TDM) - The 1992 CMP required local jurisdictions to adopt their own TDM ordinance by April 1, 1993, to encourage transit ridership, carpooling, vanpooling, bicycling, or otherwise reduce the number of vehicles on the road. To help cities meet this requirement, a model ordinance was developed and included in the 1992 CMP to complement existing efforts by the South Coast Air Quality Management District. The ordinance required "TDM-friendly" design standards for new non-residential construction. Local jurisdictions are also required to provide transit operators the opportunity to comment on the impacts of new development through the CEQA process.

Land Use - The 1992 CMP required local jurisdictions to adopt a land use analysis program that considers the impact of new development on the regional transportation system when making land use decisions. The adopted CMP included Transportation Impact Analysis (TIA) guidelines to provide a common measure countywide for assessing these regional impacts. The 1992 CMP only requires TIA for projects preparing an EIR. This approach was designed to coordinate CMP requirements with CEQA, with the intent of minimizing additional analysis requirements. The ultimate decision on addressing congestion concerns identified in an EIR remains the responsibility of the local jurisdiction under the

adopted CMP. Local jurisdictions were required to adopt this CMP land use analysis program by April 1, 1993.

Capital Improvement Program - In order to qualify for funds through the State Transportation Improvement Program (STIP), projects must first demonstrate a benefit to the CMP highway system. The Capital Improvement Program for the 1992 CMP identified those State funded projects that are already included in the 1992 STIP. Statute requires that these projects be included in the CMP in order to remain eligible for State funding.

1.2 THE 1993 CMP UPDATE

The 1993 CMP Update includes the following proposed modifications to the 1992 CMP, and informational updates:[5]

1993 Highway and Transit Monitoring Data - The 1992 CMP produced the first consistent, multi-jurisdictional analysis of traffic congestion throughout the County. The 1993 CMP provides comparable data and identifies changes in congestion levels over the past year. Transit frequency and routing data are also being compiled through information provided by transit operators as part of the Short Range Transit Plan (SRTP).

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In March 1992, a workshop was held to discuss CMP deficiency plan requirements. In response to previous Commission direction, staff reported on various CMP deficiency plan alternatives. Based on extensive testimony, Commission directed staff to develop a coordinated, countywide approach to meet deficiency plan responsibilities. As described more fully in Chapter II of this EIR, the deficiency plan approach includes: a program for assigning deficiency points to jurisdictions based on local land use decisions and their contribution of trips to the CMP network; a Tool Box of mitigation strategies, and associated mitigation point values, which local jurisdictions can use to mitigate the impacts of local land use decisions on the CMP network; and the specification of deficiency plan reporting procedures. The proposed deficiency plan Tool Box includes land use strategies, capital improvements, transportation systems management, and demand management methods of mitigation.

1.3 ENVIRONMENTAL REVIEW OF THE CMP

The EIR for the 1993 CMP Update is a subsequent tiered program EIR. Each of these concepts, and the relationship of this EIR to past and future environmental review of the CMP, is explained below.

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.[6] 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.[7] This program EIR, therefore, identifies general countywide effects of the proposed 1993 CMP Update and identifies general areas of environmental sensitivity which, where necessary, can be evaluated in greater detail in project-specific EIRs.

Subsequent EIR

Under CEQA, where a previous EIR or Negative Declaration has been prepared, no additional EIR need be prepared unless one of three things happens: subsequent changes are proposed in the project which require revisions or additions to the previous EIR as a result of the creation of the potential for significant new environmental effects not considered in the previous EIR; substantial changes occur with respect to the circumstances under which the project is undertaken; or, new information of substantial importance to the project becomes available which was not previously known and which affects the analysis.[8] This subsequent EIR is being prepared to analyze the 1993 CMP Update.

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[6]CEQA Guidelines (Cal. Code of Regulations, Title 14), Section 15168.

[7]CEQA Guidelines (Cal. Code of Regulations, Tittle 14), Section 15146.

[8]CEQA Guidelines (Cal. Code of Regulations, Tittle 14), Section 15162.

Tiered EIR

As explained in Section 15384 of the CEQA Guidelines, tiering is a procedure where broad EIRs (such as those for general plans or policy statements such as the RMP or CMP) are followed by the preparation of either narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions of the prior EIRs and concentrating solely on the issues specific to the EIR subsequently prepared. Tiering is intended to increase efficiency in the CEQA process by allowing agencies to deal with broad environmental issues in EIRs at planning stages and then to provide more detailed examination of specific effects in EIRs on later development projects that are consistent with, or implement, the plans. Use of tiering to focus on only those issues identified as requiring further consideration allows an individual EIR to fit into the process of long-term comprehensive planning, and encourages consistency between regional planning choices and specific project development.

The EIR for the 1993 CMP Update is tiered from the EIR for the 1992 CMP and from the EIR for the 1989 RMP. The CMP is required by law to be consistent with the RMP prepared by Southern California Association of Governments (SCAG). These prior EIRs provide the context for CMP development.

The EIR prepared for the SCAG 1989 RMP and the EIR prepared for the 1992 CMP, shall be considered the "first tier" and "second tier," respectively, of the CEQA process for the 1993 CMP Update. The 1993 CMP EIR constitutes the third tier of CMP environmental review and is, therefore, limited to examining impacts and mitigation measures which were not evaluated in the 1992 CMP EIR or the 1989 RMP EIR. Environmental review of individual improvement projects included in, or made necessary by, the CMP will constitute the fourth tier of CMP environmental review. Mitigations were included in the 1992 CMP EIR to ensure that adequate environmental review of individual improvement projects occurs. The Mitigation Monitoring Program for the 1992 CMP is included in Appendix B of this EIR.

The 1989 RMP EIR and the 1992 CMP EIR

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 Air Quality Management Plan (AQMP). The goal of the RMP is to maintain 1984 mobility levels.

The RMP EIR looked at the potential impacts of the RMP on: mobility and access; air quality; energy and conservation; geology and seismicity; biological resources; water resources; visual resources; noise; cultural resources; social; urban form and growth; and the regional economy. It evaluated five alternatives to the adopted RMP: the No-Project Alternative; two facilities-intensive alternatives; and two demand management intensive alternatives.

The 1992 CMP EIR, which was tiered from the EIR for the RMP, looked at the following potential impacts of the CMP: land use and planning, transportation, air quality, noise, geology, water resources, biological resources, cultural resources, and public services. It examined the following alternatives to the CMP: the No-Project (Existing Transportation System) Alternative; the No-Project (No CMP, No Future State Funding) Alternative; and two alternatives designed to be consistent with the balance between TDM and capital intensive approaches to maintaining mobility selected in the RMP. These two alternatives were a capital intensive Alternative which accelerated much of the capital component of the RMP into the 7 years of the CMP's CIP, and a TDM Intensive Alternative, which emphasized implementation of additional TDM measures, while delaying capital improvements until late in the RMP's implementation. The adopted CMP represents a balance between implementation of the capital intensive and TDM strategies contained in the adopted RMP. The proposed deficiency plan Tool Box has been designed to strike the same balance between capital intensive and TDM approaches to maintaining mobility.

Environmental Review of the 1993 CMP Update

On May 21, 1993, a Notice of Preparation (NOP) and Initial Study for the 1993 CMP Update were issued by the MTA. A copy of the NOP, the Initial Study, and comment letters received in response to the NOP are contained in Appendix C. In addition, a scoping session for this EIR was held on June 22, 1993, at the MTA offices to obtain comments on the Initial Study and the proposed contents of this EIR.

The Initial Study examines the potential of the changes in the CMP contained in the 1993 Update to create significant environmental impacts. As explained in the Initial Study, according to Section 21094 of CEQA, where a prior EIR has been prepared and certified for a program, plan, policy, or ordinance, the Lead Agency for a later project shall examine significant effects of the later project upon the environment by using a tiered environmental impact report, except that the report on the later project need not examine those effects which the lead agency determines were either: (1) mitigated or avoided pursuant to subdivision (a) of Section 21081 of CEQA as a result of the prior environmental impact report; or (2) examined at a

sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

The Initial Study for the 1993 CMP Update, therefore, analyzed whether the 1993 CMP Update has the potential to create significant effects on the environment, which were not examined in the EIR for the 1992 CMP or in the EIR for the RMP, from which the EIR for the 1992 CMP was tiered. It was the conclusion of the Initial Study that: (1) the 1993 deficiency plan addition to the CMP does have the potential to create significant effects on the environment, not previously analyzed; and (2) that the other proposed changes in the program either do not pose the potential for significant effects on the environment, or have the potential to create effects, but that mitigations included in the 1992 CMP EIR are sufficient to address these potential effects.

Based on the Initial Study for the 1993 CMP Update, this EIR evaluates the 1993 CMP's potential to create significant environmental effects on:

- Transportation
- Air Quality
- Energy
- Land Use
- Public Services

Since the deficiency plan component is the addition to the CMP contained in the 1993 Update with the potential to create significant impacts, and since the 1992 CMP EIR evaluated alternatives to the CMP as a whole, this EIR examines the potential impacts associated with the following alternatives to the proposed deficiency plan approach:

- The No-Project Alternative (No-Deficiency Plan Addition)
- The No-Countywide Deficiency Plan Alternative
- A Countywide Fee Alternative
- A Monitoring Based Mitigation Approach Alternative
- A Modified Tool Box - Hot Spot Reducing Approach Alternative

II. PROJECT DESCRIPTION

The proposed project consists of the adoption and implementation of the 1993 Congestion Management Program (CMP) Update for the County of Los Angeles. The 1993 CMP will be administered by the Los Angeles County Metropolitan Transportation Authority (MTA), which is the designated Congestion Management Agency (CMA) for Los Angeles County. The MTA is the lead agency for the preparation of this Subsequent Tiered Program Level Environmental Impact Report (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 and the 1993 Update.

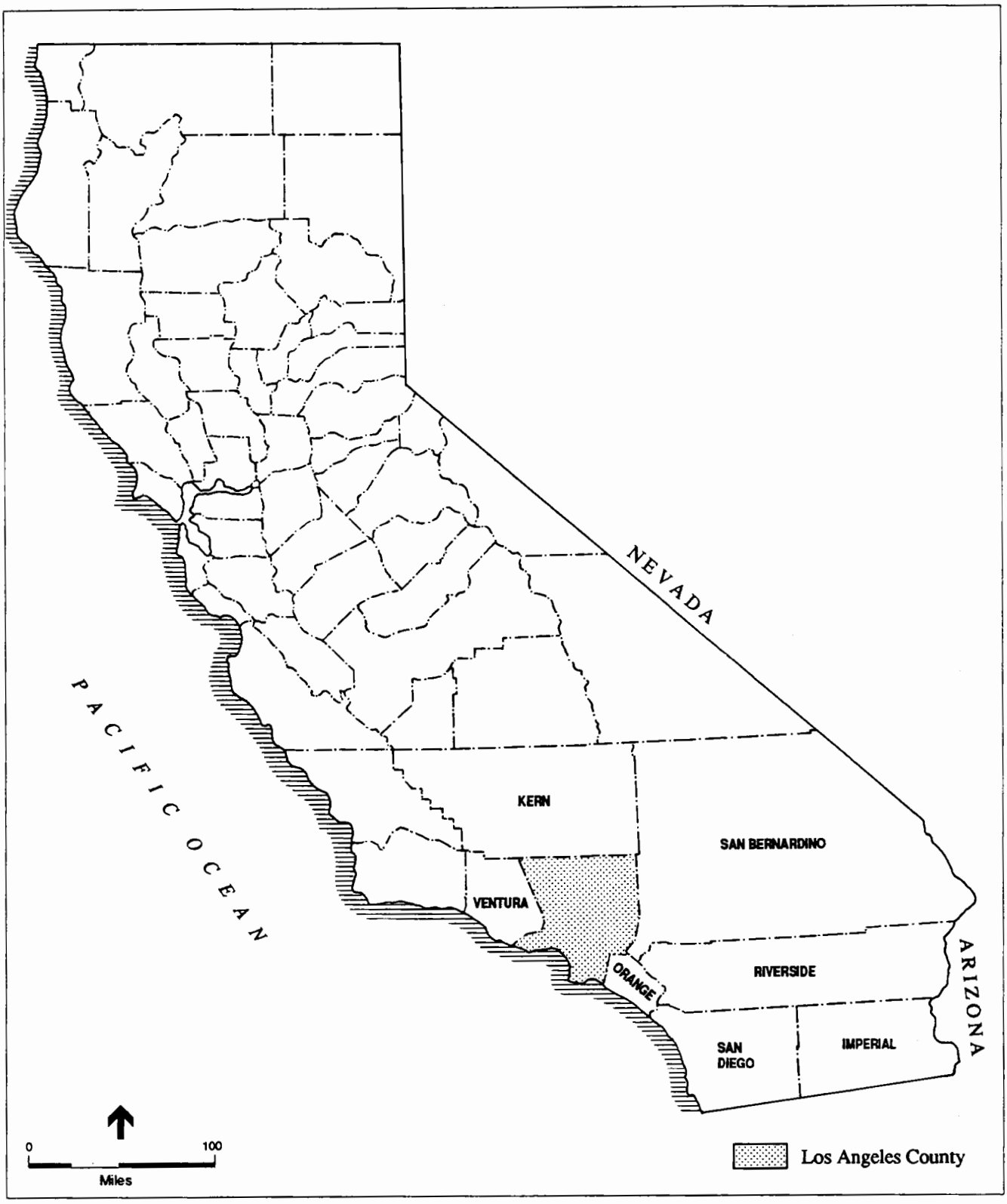
2.1 PROJECT LOCATION

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 2.1**).

The County contains 88 incorporated cities. These cities contain 8,196,300 of the County's 9,158,400 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 2.1** lists the cities in the County. **Figure 2.2** 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 2.3**). **Table 2.2** shows the growth projections for the sub-regional areas within the County.

[1]Data is from the California Department of Finance. Population figures are for January of 1993. The figures were provided by Andy Malakates, Los Angeles County Research and Community Relations Department, telephone conversation, July 8, 1993.

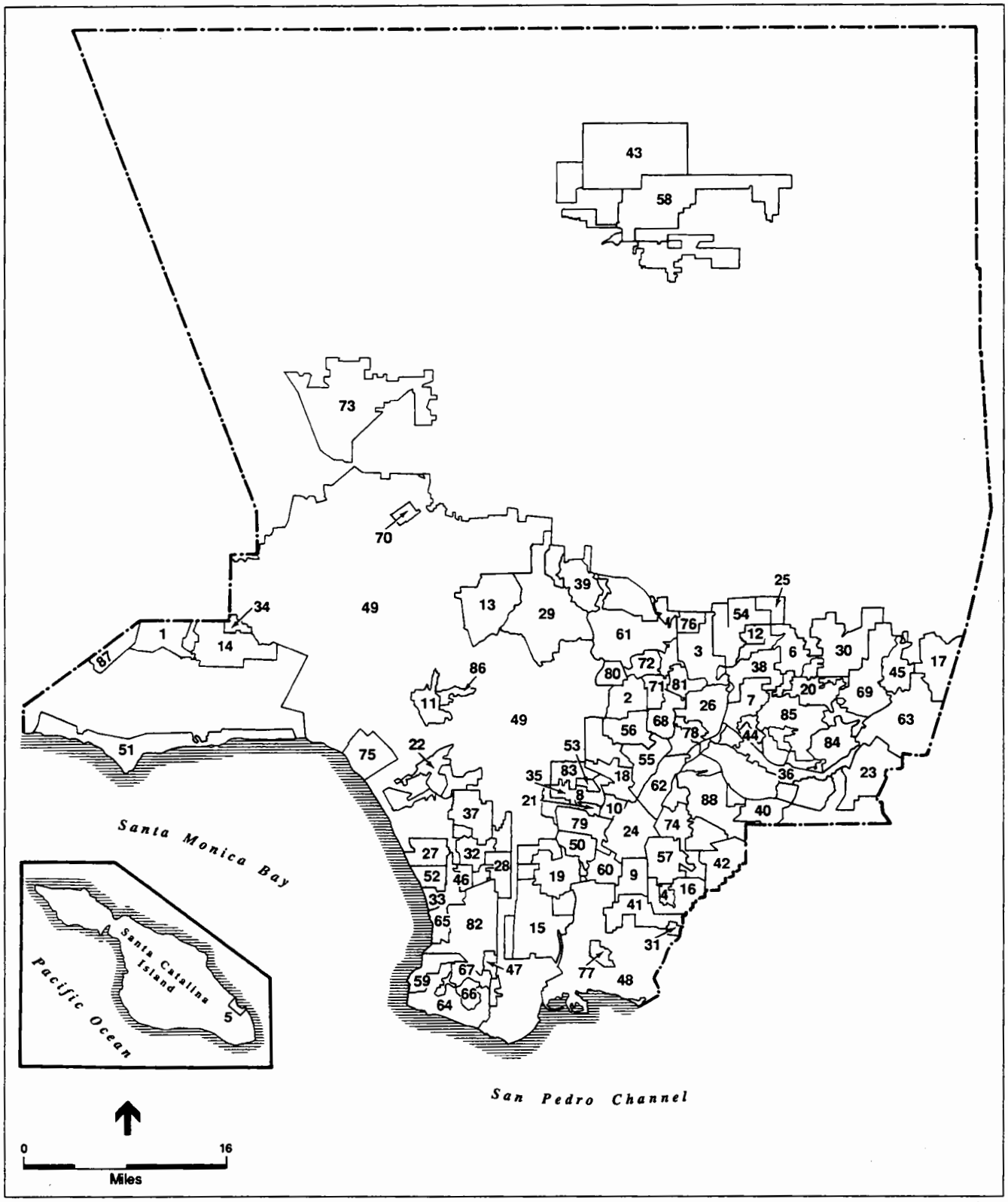


SOURCE: Environmental Science Associates, Inc.

TABLE 2.1 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.	SANTA 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.	LAKEWOOD	85.	WEST COVINA
42.	LA MIRADA	86.	WEST HOLLYWOOD
43.	LANDCASTER	87.	WESTLAKE VILLAGE
44.	LA PUENTE	88.	WHITTIER

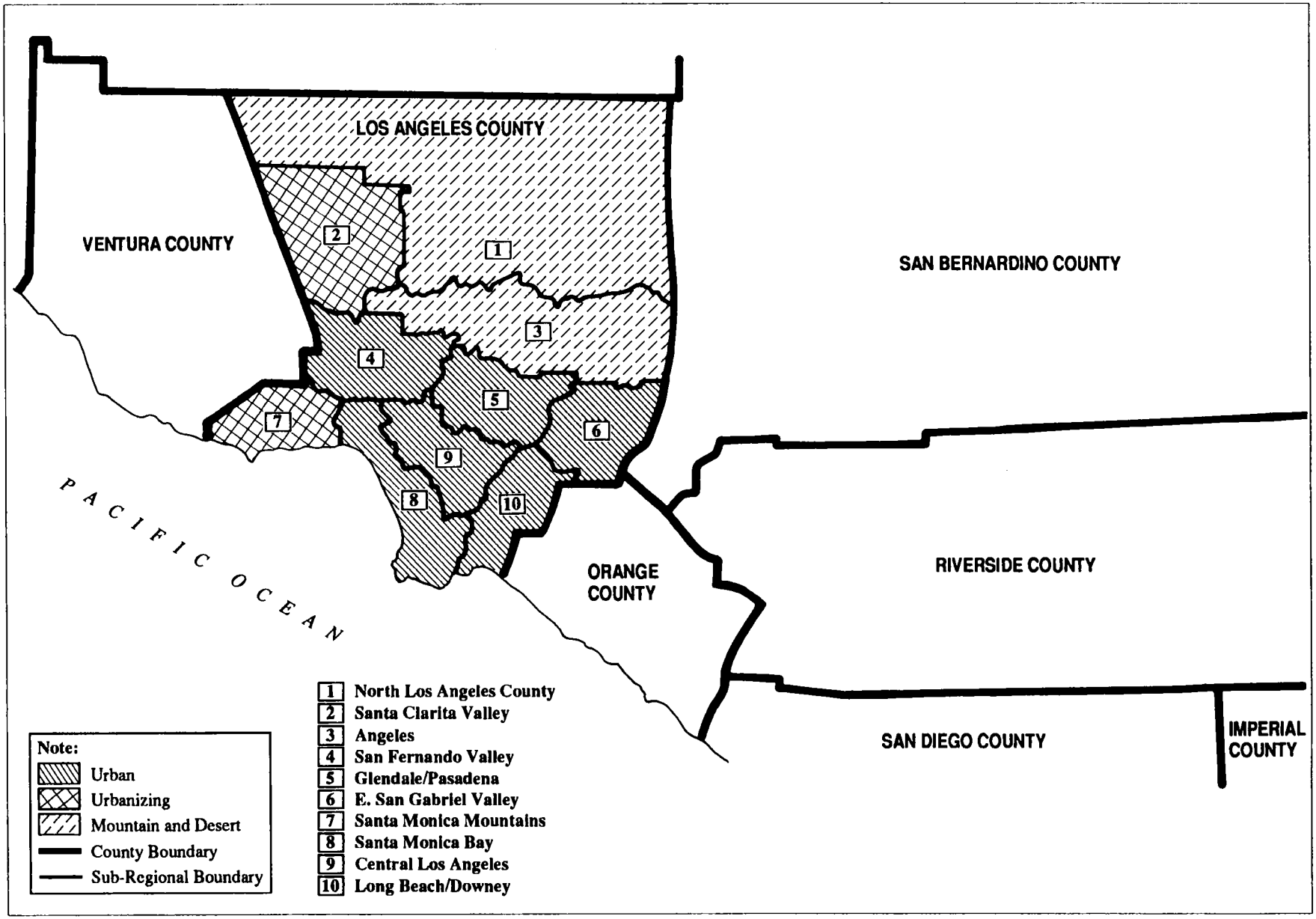
SOURCE: Los Angeles County Research and Community Relations Department.



1993 CMP UPDATE
Environmental Impact Report

FIGURE 2.2
LOCATION OF CITIES AND UNINCORPORATED AREAS

SOURCE: Environmental Science Associates, Inc.



1993 CMP UPDATE
Environmental Impact Report

FIGURE 2.3
SUBREGIONAL AREAS

SOURCE: (SCAG) Southern California Association of Governments

TABLE 2.2 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	12.0%	1,435,300	1,634,500	14,0%	777,100	898,100	16.0%
E. San Gabriel Valley	739,300	1,071,500	45.0%	239,300	391,600	64.0%	233,000	355,100	52.0%
Glendale/Pasadena	1,202,200	1,412,000	17.0%	485,400	616,200	27.0%	442,500	537,100	21.0%
Long Beach/Downey	1,075,800	1,312,100	22.0%	482,600	632,200	31.0%	400,000	503,500	26.0%
San Fernando Valley	1,177,400	1,593,900	35.0%	580,900	809,800	39.0%	454,000	643,000	42.0%
Santa Monica Bay	1,297,400	1,606,400	24.0%	759,500	1,012,500	33.0%	519,200	666,100	28.0%
Subtotal	7,594,100	9,350,400	23.0%	3,983,000	5,096,800	28.0%	2,825,800	3,602,900	28.0%
County Share	96.58%	91.39%		98.28%	94.52%		96.66%	91.00%	
URBANIZING									
Santa Clarita Valley	89,200	242,400	172.0%	23,400	102,200	337.0%	29,200	89,800	208.0%
Santa Monica Mountains	58,100	106,400	83.0%	13,200	31,800	141.0%	21,300	42,900	101.0%
Subtotal	147,300	348,800	137.0%	36,600	134,000	266.0%	50,500	132,700	163.0%
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	345.0%	32,700	160,800	392.0%	46,100	222,600	383.0%
Subtotal	121,300	532,000	339.0%	33,300	161,400	385.0%	47,200	223,700	374.0%
County Share	1.54%	5.20%		0.82%	2.99%		1.61%	5.65%	
TOTAL FOR COUNTY	7,862,700	10,231,200	30.0%	4,052,900	5,392,200	33.0%	2,923,500	3,959,300	35.0%

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

As shown in **Table 2.2**, 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 percent in 1984 to 91.39 percent 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 percent to 242,400, employment by 337 percent to 102,200, and housing by 208 percent to 89,800. North Los Angeles County is anticipated to experience a 345 percent increase in population to 529,600, a 392 percent increase in employment to 160,800, and a 383 percent 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 percent to 3.41 percent 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 percent to 5.2 percent of the population.[2]

2.2 CONGESTION MANAGEMENT PROGRAM REQUIREMENTS

The CMP is a program enacted by the State to address traffic congestion in California's urbanized counties.[3] 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.

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

[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.

[3]See Section 65089 of the California Government Code.

became effective when Proposition 111 was enacted by the voters in June of 1990. The California voters approved Propositions 108 and 111 in June of 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 10-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 Transportation Demand Management (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 Levels of Service (LOS) 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 CMA to develop and biennually update a CMP. Preparation of a CMP is a condition for eligibility to receive the State gas 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 within 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 7-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.[4] The MTA has developed such a model for Los Angeles County. The CMA also has the responsibility 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.[5] SCAG is the regional transportation agency for Los Angeles County. SCAG must then evaluate whether the proposed CMP is consistent with the Regional Mobility Plan (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 D. If SCAG finds that the CMP is inconsistent with the RMP, it may remove inconsistent projects from the Regional Transportation Improvement Program (RTIP). [6] Consistent CMPs are incorporated into the RMP and serve 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.

Goals and Objectives

The CMP legislation was created by the State Legislature in recognition of the following conditions and with the following objectives:[7]

(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 means of available transport.

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[4]See Section 65089(b)(5) of the Government Code.

[5]See Section 65089.2 of the Government Code.

[6]See Section 65089.2 of the Government Code.

[7]Section 65088 of the Government Code.

(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.

2.3 THE 1992 ADOPTED CMP

In November 1992, the MTA adopted the first CMP for Los Angeles County and certified the accompanying Final EIR. Because the CMP was a new program, the MTA adopted a first year CMP that was designed to meet the basic legislative requirements for a CMP and to establish a countywide planning framework for addressing congestion on the regional transportation network.

Goals and Objectives

The adopted 1992 CMP was designed to meet the following goals and objectives, in addition to the goals and objectives specified by the State Legislature:

- The first year CMP focused on defining a basic, core program, consistent with statutory requirements. As this program must be biennially updated, MTA will build on this core program as implementation experience is gained.

- Local land use authority will remain the responsibility of local jurisdictions. MTA is not responsible for directing the land use decisions of local jurisdictions. Rather, the CMP process is a tool to assist local jurisdictions in making land use decisions that consider and enhance countywide mobility.

- The CMP will give local jurisdictions flexibility in meeting CMP responsibilities through existing local procedures rather than creating new CMP processes.

- MTA will work closely with local jurisdictions in implementing the CMP to ensure local conformance with CMP requirements and continued allocation of state gas tax funds.

- The CMP implementation process will be a tool for increasing coordination between: transportation providers responsible for implementing the best mix of transportation solutions; land use and transportation programs; and neighboring cities and counties.

- The CMP will be a focal point for ensuring consistency, compatibility, and integration of other MTA transportation studies.

- The CMP will serve as an important resource in the current update of the SCAG RMP. MTA will work closely with SCAG in the update of the RMP, providing input based on what MTA has learned through the CMP process. This will enable SCAG to incorporate relevant CMP information into the RMP and the regional planning process.

- Equity with respect to cost of service, quality of service, and access to service will be considered in programming decision made by MTA in the implementation of the CMP. In addition, equity considerations will be incorporated in ongoing area-specific needs assessment and service distribution studies.

- Economic development opportunities will be aggressively pursued in high-volume transit corridors. MTA 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.

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

2.4 THE PROPOSED PROJECT - THE 1993 CMP UPDATE

The proposed project consists of the 1993 Update of the CMP. This is the first of the biennial updates to the CMP for Los Angeles County to be prepared. Biennial updates are required by statute. The 1993 CMP Update contains the following key changes to the program:

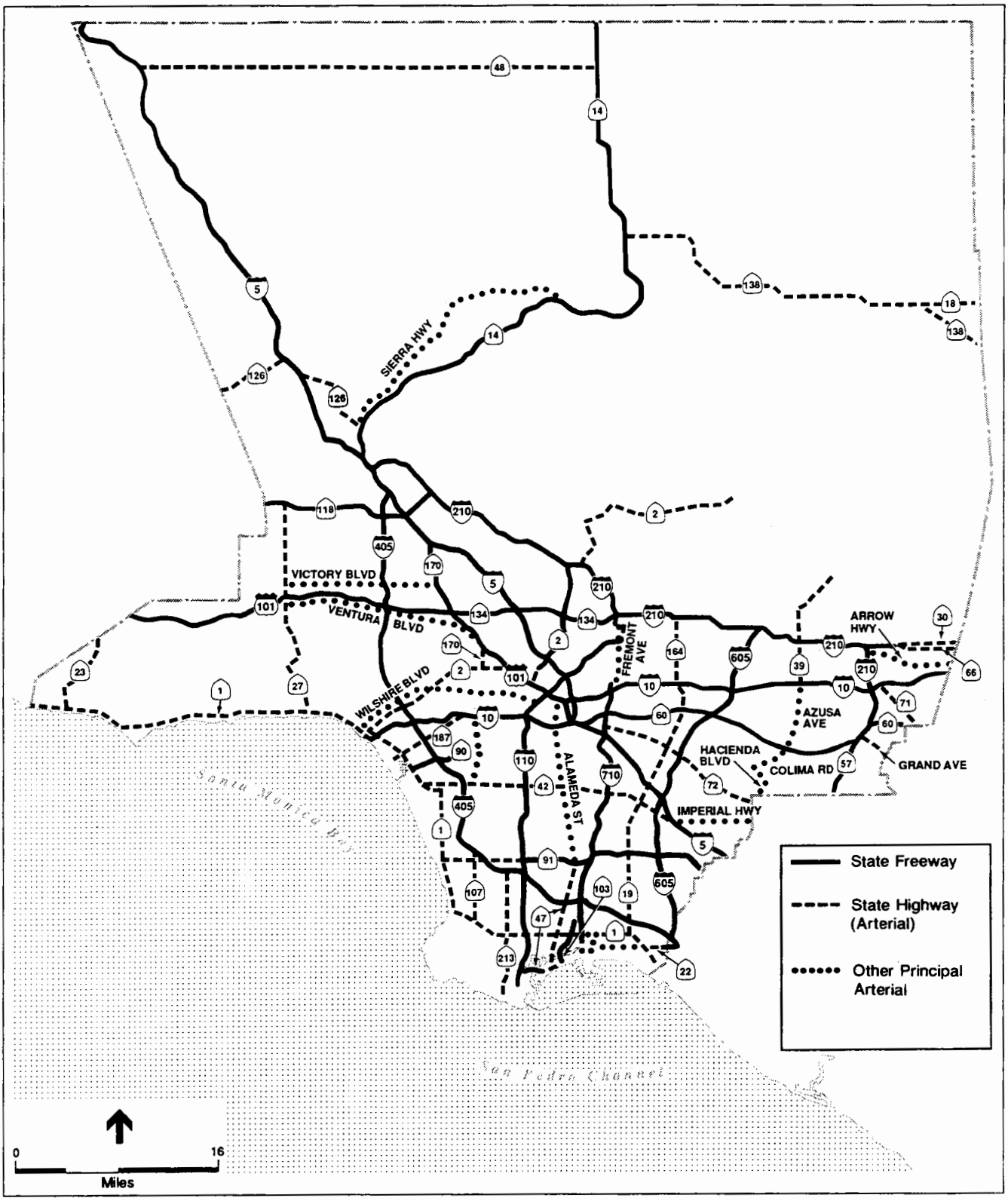
1993 Highway and Transit Monitoring Data - The 1992 CMP produced the first consistent, multi-jurisdictional analysis of traffic congestion throughout the County. The 1993 CMP Update provides comparable data, and identifies changes in congestion levels over the past year. Transit frequency and routing data are also being compiled through information provided by transit operators as part of the Short Range Transit Plan (SRTP).

Additions to the CMP Highway and Roadway System - The 1992 CMP established a mechanism for adding routes through the biennial CMP update. As part of the 1993 CMP Update, La Cienega Boulevard between the Santa Monica Freeway (I-10) and the San Diego Freeway (I-405) will be added to the system. **Figure 2.4** shows the CMP Highway and Roadway System with the addition of the La Cienega Boulevard segment.

Refinement of the Land Use Analysis Program - The 1992 CMP established guidelines for analyzing the impacts of new development on the regional transportation system through existing CEQA requirements. These guidelines included technical procedures for analyzing the impacts of individual development projects at CMP intersections and freeway segments.

Through implementation, CMP staff has found that a brief supplement to these guidelines would allow for the analysis of longer range and more generalized development programs such as local general plans and community plans. By allowing the analysis of these plans to focus on CMP street segment analysis rather than intersections, comparable evaluation of regional impacts and mitigation measures can be provided. This supplement is intended to improve the effectiveness of the land use analysis program at capturing cumulative development impacts, while permitting more generalized technical evaluation in keeping with the programmatic nature of general plans and to minimize administrative costs.

Update of the Capital Improvement Program - State programming statute requires that projects competing for State Flexible Congestion Relief (FCR) funds be included in the CMP, and that projects competing for Traffic System Management (TSM) funds be consistent with the CMP. 1992 CMP monitoring data and analysis have been integrated into the MTA's Multi-Year Call for Projects, and were used in evaluating the regional significance of project applications. Those projects that were recommended for State funding are incorporated into the 1993 CMP Capital Improvement Program.



1993 CMP UPDATE
Environmental Impact Report

FIGURE 2.4
CMP HIGHWAY NETWORK

SOURCE: LACTC

As detailed in the Initial Study for the 1993 CMP Update contained in Appendix C, these changes either do not have the potential to create significant effects on the environment, not previously analyzed in the 1992 CMP EIR, or mitigations included in the 1992 CMP EIR and the Mitigation Monitoring Program for the 1992 CMP[8] are sufficient to address potential impacts.

The other key change in the CMP included in the 1993 Update, and the one with the potential to create environmental impacts, is the addition of a deficiency plan component. It is the potential effects of this addition, which are the subject of this EIR.

THE PROPOSED DEFICIENCY PLAN ADDITION

The MTA's proposed deficiency plan procedures were developed through extensive consultation. Since their creation in 1991, both the CMP Policy Advisory Committee (PAC) and the CMP Technical Forum have met monthly to assist in CMP development. The 37-member Policy Advisory Committee consists of representatives reflecting a cross-section of local jurisdictions countywide, representatives of regional and state agencies (Caltrans, SCAG, Commuter Transportation Service, and the SCAQMD), transit operators, as well as representatives of the environmental and business communities.

In addition, there has been an intense effort to discuss specific aspects of the deficiency plan through numerous special working sessions, devoted to topics such as land use strategies, transportation demand management strategies, capital improvement strategies, transit issues, and new development activity reporting.

A variety of other mechanisms have also been used for public outreach and consultation. A monthly newsletter, *Up to Speed*, is mailed to approximately 2,000 people and provides a regular update of the status of CMP development, document review periods, and key meetings. A telephone hotline also provides up-to-date information on CMP issues and meetings. CMP staff have also been active in presenting the CMP in a wide range of forums and to a wide range of interests, including local jurisdictions, Chambers of Commerce, business and development groups, and environmental groups.

The proposed approach is designed to address deficiencies projected to occur on the regional network between 1990 and 2010. Projected deficiencies have come

[8]The Mitigation Monitoring Program for the 1992 CMP is contained in Appendix B.

to be referred to as the "congestion gap." The approach is the result of extensive study regarding the mitigation value of different land use, TDM, and capital improvement strategies.

Goals and Objectives

In developing its deficiency plan procedures, the MTA sought to develop a countywide approach to deficiency planning which met the following goals and objectives, as well as the State Legislature's CMP goals and objectives, and the goals and objectives outlined in the adopted CMP:

- **Countywide Deficiency Plan Approach** - Because of the complexity and interrelatedness of transportation impacts, local jurisdictions cannot bear the burden of addressing deficiencies themselves. Due to overwhelming support from both local jurisdictions and the development community for a countywide approach to meeting deficiency plan requirements, the proposed approach should be countywide in nature.

- **Effectiveness and Flexibility of Actions** - Mitigation resulting through the deficiency plan must be effective at addressing congestion on the regional system. Furthermore, the program should remain flexible to accommodate new ideas, as well as the diversity of community characteristics within Los Angeles County.

- **Minimizing Administrative Costs** - The deficiency plan should be as simple as possible, focus on mitigation implementation, and build upon existing processes rather than creating new analysis or bureaucratic requirements.

- **Sensitivity to the Economy and Jobs** - The program should be responsive to cycles in the economy.

- **Consistency and Fairness Among Communities and Developments** - The program should establish consistent requirements throughout the County, and account for the cumulative impacts of growth rather than focusing on specific types or sizes of development.

- **Promoting Inter-Jurisdictional Mitigation** - The program should encourage mitigation of impacts that cross jurisdictional boundaries.

- **Transit Enhancing Land Use** - Due to the impact of land use patterns on transportation, the program should create incentives for appropriate land use densities to make transit alternatives viable transportation options.

Regulatory Framework

California Government Code Section 65089.3(b) specifies the necessary elements of deficiency plans. Deficiency plans are required when portions of the CMP highway system deteriorate to LOS F, or worsen within LOS F. In summary a deficiency plan must include:

(a) An analysis of the cause of the deficiency.

(b) A list of improvements necessary for the deficient segment or intersection to maintain the minimum LOS otherwise required and the estimated costs of the improvements.

(c) A list of improvements, programs, or actions, and estimates of costs that will (i) measurably improve the level of service of the system, and (ii) contribute to significant improvements in air quality.

(d) An action plan, consisting of improvements identified in (b) or (c) above and including a specific implementation schedule.

Statute also provides guidelines for the determination of deficiencies, deficiency plan contents, and agencies that must be consulted during deficiency plan development. The city or county must forward its adopted deficiency plan to the CMA for approval.

Approach Development

The first step in developing the proposed countywide deficiency plan approach was to quantify the size of the problem. This was done by modeling the transportation system as it is anticipated to look in Year 2010 with the improvements programmed in the 30-year Plan, assessing the LOS on the 2010 System which would occur given projected Year 2010 population, employment, and housing patterns, and comparing the LOS to the 1990 base year LOS on the system to determine the degree to which programmed improvements will maintain base year mobility levels. The "congestion gap" is the magnitude of deficiencies projected to remain on the CMP system after implementation of transportation improvements programmed by the Year 2010. In general terms, model runs indicate that roughly 15 percent of the trips generated by growth within Los

Angeles County through 2010 will contribute to CMP deficiencies. This represents the size of the congestion gap which needs to be addressed through deficiency plans. This 15 percent of new trips is equivalent to 3 percent of all trips projected to occur in 2010.

The second step in the development of the proposed approach was to develop a program for assigning responsibility for addressing this congestion gap. After extensive evaluation of options, monitoring of new development activity was selected as providing the best indicator for attributing mitigation responsibility to local jurisdictions. The intent in selecting this approach was to allow the program to respond to economic cycles, by providing a method for mitigation goals to increase or decrease proportionate to development activity within local jurisdictions. The intent was also to ensure assignment of mitigation responsibilities to those jurisdictions that contribute to the impacts; to be proactive by allowing jurisdictions to plan for mitigation before the impact occurs; and to control for the variability of regional growth forecasts, by establishing mitigation goals based on actual growth, rather than assumed regional growth trends.

The third step in developing a countywide approach was to decide how to mitigate deficiencies. Based on review of the range of mitigation strategies being developed throughout the region, and the desire of many local jurisdictions to maintain flexibility for local characteristics, it was decided to provide a "Tool Box" approach to mitigation. Mitigation strategies included in the Tool Box fall into three broad categories: land use, transportation demand management, and capital improvements. Under the proposed approach, local jurisdictions may select the actions they deem most appropriate for their community from the Tool Box. Mitigation measures can be applied throughout the jurisdiction, in a subarea, or to a specific project. Jurisdictions can also work together on corridor or subregional strategies. Once the jurisdiction chooses its mitigation strategies, the basic requirement is that the overall value of the mitigation program must be commensurate with the jurisdiction's mitigation goal, as determined by new development activity.

Proposed Deficiency Plan Requirements

As a countywide program, all local jurisdictions within Los Angeles County must participate in the deficiency plan process regardless of the number of CMP intersections or congestion levels within their geographic limits. Deficiency plan preparation will require local jurisdictions to track new development, calculate the number of debit points resulting from that development, select a mix of Tool Box strategies with an equivalent mitigation value, and prepare and submit a Local Implementation Report for MTA review and approval.

Tracking of New Development and Calculation of Debit Points

Under the proposed program, each local jurisdiction must track new development activity as the basis for calculating its annual congestion mitigation goal. The goal links deficiencies on the CMP system to development activity, using a uniform point system based on the trip generation and trip length characteristics of various land uses. Under the proposed program, each jurisdiction will be required to:

- Track new development activity through building permits issued for residential dwelling units and square footage of other land uses.

- Report annually the total new development activity by land use category, less permits issued for CMP-exempted land uses. The land use categories are listed in **Table E-1** in Appendix E.

- Use the annual new development totals to calculate the jurisdiction's congestion mitigation goal, using worksheets provided by MTA. The proposed first year debit point formulas for each land use category are provided on **Table E-1** in Appendix E. It is anticipated that point values may be updated periodically, as information regarding the contribution of development to congestion on the network is updated as a result of network monitoring.

Selection of Tool Box Strategies

The local jurisdiction must then select a mix of mitigation measures from the CMP Tool Box of strategies. The 1993 CMP Update includes procedures for adding additional tools to the Tool Box. **Table E-2** in Appendix E lists the Tool Box measures and their associated mitigation point value. Point values are based on existing research regarding the effectiveness of the various strategies. It is anticipated that point values may be updated periodically, as additional information regarding the mitigation value of strategies becomes available. The Tool Box contains the following categories of strategies:

- **Land Use Strategies** - which focus on integrating complementary land uses (such as homes and shops), and on concentrating activity in areas that can be efficiently served by transit. Effectively locating land uses should reduce the demand for travel on the CMP system, thereby addressing regional traffic congestion.

- **TDM Strategies** - which include programs and provisions supporting facilities to promote travel by modes other than driving alone. As with land

use strategies, TDM actions address traffic congestion on the CMP system by reducing the demand for travel. In addition, TDM actions are intended to promote more efficient use of the CMP system by increasing the number of people travelling in the same number of vehicles.

- **Transportation Systems Management (TSM) Strategies** - which improve the operational efficiency of the existing highway system without significantly increasing right-of-way requirements, and at costs significantly lower than capital improvements. TSM strategies are intended to reduce regional traffic congestion by reducing delays and smoothing stop-and-go traffic flow on regionally significant highway facilities.

- **Capital Improvements** - which provide the basic infrastructure for moving people and goods. Highway improvements are intended to reduce delays on the CMP system by increasing the capacity for vehicle movement, either directly on the CMP system or by providing capacity on alternate routes. Transit and ridesharing capital improvements are similarly intended to benefit the CMP system, by providing the infrastructure for travel by modes other than driving alone.

Each jurisdiction may select the actions that it determines most appropriate, as long as the overall value of its mitigation program is commensurate with its mitigation goal determined by new development activity. The proposed program does not require a linkage of mitigation to individual development approvals. A jurisdiction may choose to implement strategies affecting existing activity rather than new development. Each jurisdiction has the flexibility to choose the measures it deems most appropriate - multi-jurisdictional, citywide, subarea, or project-specific. The jurisdiction may pick any combination of strategies; jurisdictions are not limited to selecting strategies from within a single category.

Funding for mitigation can be from any source programmed by the local jurisdiction. Projects funded through MTA discretionary sources, (State Flexible Congestion Relief (FCR), Traffic Systems Management (TSM) Proposition A and C Discretionary, and federal discretionary Intermodal Surface Transportation Act (ISTEA) funds), do not count toward meeting local jurisdiction deficiency plan obligations.

Where a jurisdiction contributes local match to a regional discretionary project, the local credit is based on the mitigation value of the project and the proportion contributed by the jurisdiction.

The Phase II TDM Option - The proposed program also provides local jurisdictions with the option of meeting the deficiency plan requirement through adoption of a Phase II TDM Program which meets the more stringent Air Quality Management Plan (AQMP) Transportation Control Measure (TCM) requirements. The AQMP and the RMP call for a 10 percent reduction of all trips by the year 2010 for air quality purposes. In contrast, the proposed CMP deficiency plan is designed to address the congestion gap, which represents a 3 percent reduction in projected year 2010 trips.

Local Jurisdiction Report Submittal

In preparing their report, local jurisdictions are encouraged to consult with Caltrans, adjacent jurisdictions, and other interested organizations or individuals, such as business and environmental groups. Reports can be prepared and submitted jointly by multiple jurisdictions. The report must incorporate evidence that it has been adopted at a public hearing by the local City Council or Board of Supervisors before submittal to MTA. The report is required to: contain a calculation of the jurisdiction's congestion mitigation goal based on new development activity; identify the locally selected mitigation strategies chosen from the Tool Box of mitigation strategies and the credits for those strategies; include a description and status of funds that will be used for implementation of each selected strategy; and identify the implementation timeline for each selected mitigation strategy.

MTA Review of Local Reports

Statute requires that the MTA conduct a noticed public hearing on the conformance of local jurisdiction reports, at which time the MTA may either accept or reject the report in its entirety.

Implementation Schedule

Table 2.3 lists the implementation schedule for the proposed project. Dates in boldface indicate an action or milestone for local jurisdictions. Other dates correspond to MTA actions and milestones.

TABLE 2.3 PROGRAM IMPLEMENTATION SCHEDULE

May 1993	Recommended deficiency plan and other changes for the 1993 CMP Update reported to MTA Board. Initial Study and Notice of Preparation for EIR released.
July 1993	Draft EIR released.
October 1993	Final EIR released.
November 1993	Final EIR and 1993 CMP Update presented to MTA Board for certification and adoption.
May 1994	Jurisdictions submit resolutions of conformance and local implementation reports to MTA including: • mitigation credits for actions implemented to date; and • commitment to start new development tracking procedures by June 1, 1994.
October 1994	MTA Board makes CMP conformance determinations.
September 1995 and biennially thereafter	Jurisdictions submit resolutions of conformance and local implementation reports to MTA including: • congestion mitigation goal based on previous year's development activity; • credit for mitigation strategies implemented since last year; and • congestion mitigation program for the next two years.
October 1995	MTA Board makes CMP conformance determinations.
November 1995	1995 CMP Update submitted to MTA for approval.
September 1996 and biennially thereafter	Jurisdictions submit resolutions of conformance and local implementation status reports to MTA including: • congestion mitigation goal based on previous year's development activity; and • status of mitigation strategy implementation.
October 1996	MTA Board makes CMP conformance determinations.

SOURCE: MTA CMP Staff.

2.5 APPROVALS FOR WHICH THE EIR WILL BE USED

The MTA will use this program level EIR as part of its review and approval of the 1993 CMP Update. Local jurisdictions may reference this EIR during deficiency plan approval; and as part of environmental review, project approval, and EIR certification decisions for regionally significant projects. 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, deficiency plans, and other regionally significant transportation projects, may use this EIR in evaluating proposed projects.

III. ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATIONS

This chapter contains a discussion of the environmental setting, impacts, and mitigations associated with the potentially significant impact areas identified for the 1993 Congestion Management Program (CMP) Update. The first portion of this Chapter, Section 3.1, explains the analytic approach taken in analyzing the potential impacts of the 1993 CMP Update. The remaining sections address the issue areas identified in the Initial Study as being of concern. The issue areas discussed, and the section of this chapter in which they appear, are listed below:

3.2 Transportation
3.3 Air Quality
3.4 Energy
3.5 Land Use
3.6 Public Services

As appropriate, these issue areas are discussed in terms of the potential of the 1993 CMP Update to create both direct and indirect impacts. Direct impacts are the physical changes in the environment which could result from implementation of the deficiency plan program. Indirect impacts are the potential effects of the CMP program as a whole.

3.1 ANALYTIC APPROACH

The objective of the proposed deficiency plan program is to address the "congestion gap" for the County. As explained in greater detail in Chapter 2, Section 2.4, the congestion gap refers to the remaining deficiencies which are projected to occur on the regional network between 1990 and 2010 after implementation of currently programmed transportation improvements. Model runs indicate that roughly 15 percent of trips generated by growth within Los Angeles County through 2010 will contribute to CMP deficiencies. This 15 percent of new trips is equivalent to 3 percent of all trips projected to occur in 2010.

The regional model is also able to express this gap in terms of person miles of travel (PMT). The current modeling analysis indicates that a total of 8,100,000 PMT resulting from new development must be mitigated to address the congestion gap.

The Tool Box Approach and Its Analysis

For purposes of implementing the CMP deficiency plan process and allocating mitigation responsibility throughout the County, the PMT congestion gap has been defined in terms of "points" of debits and credits. Debit points are earned by local jurisdictions as a result of development activity, with different numbers of debit points being earned by different land use types in keeping with the trip generation

value of different land uses. **Table E-1** in Appendix E lists the debit values for different land uses.

To offset their debit points, each jurisdiction within the County is responsible for selecting a market basket of mitigation strategies which is commensurate with the number of debit points earned due to the approval of new development projects. Mitigation strategies are to be selected from the Tool Box of strategies included in the 1993 CMP Update. The complete list of strategies and their mitigation value is contained in **Table E-2** in Appendix E. There are 50 strategies in total in the proposed Tool Box. The proposed program includes a mechanism for adding additional strategies to the Tool Box over time and for modifying the point values of individual mitigations, based on additional research regarding the effectiveness of the mitigation strategies. The strategies fall under the following categories:

- **Land Use Strategies** - which reduce the demand for vehicle trips, including strategies which focus development around transit centers, and provide for mixed use developments which reduce the need for vehicle tripmaking.

- **Demand Management Strategies** - which reduce the demand for vehicle trips, including ridesharing programs, physical ridesharing support facilities, ridesharing incentives, transit improvements and telecommunications.

- **Capital Improvement and Systems Management Strategies** - which increase or enhance system capacity, including the addition of high occupancy vehicle lanes, mixed flow lanes, intersection improvements, rail stations, goods movement facilities, signal system enhancements, and other measures.

The intent of the Tool Box approach is to allow individual jurisdictions to choose the strategies which are most suited to their individual circumstances as long as the total number of credit points is commensurate with the number of debit points they have accumulated.

For purposes of assessing the impacts of the proposed program, it would be ideal if the exact mix of strategies to be chosen could be predicted, then the impacts of implementation of the measures could be precisely analyzed. Due to the built-in flexibility of the program, however, it is not possible to forecast which strategies will be chosen by which jurisdictions.

Impact Assessment Method

Since it is not possible to forecast the mix of strategies to be chosen, this Environmental Impact Report (EIR) analysis focuses on two extremes of strategy selection. These extremes "bracket" the possible range of strategies that could be selected countywide. The two bracketing scenarios analyzed are as follows:

- **Trip Reduction Emphasis** - Countywide, all of the Tool Box measures chosen reflect actions which decrease demand for travel via land use strategies or transportation demand management (TDM) strategies

- **Capacity Enhancement Emphasis** - Countywide, all of the Tool Box measures chosen result in increases in system capacity via capital improvement and traffic systems management strategies

If all jurisdictions choose trip reduction strategies, the impacts on the system will be different than if all the jurisdictions choose capacity enhancements. A combination of the two extremes would result in a combined impact which would fall between the two ends of the "bracket." The purpose of using the bracketing approach to analyzing the potential Tool Box options is therefore to identify the potential extremes of impacts of the proposed program. The two ends of the bracket are described in more detail below.

Trip Reduction Emphasis - This package includes the assumption that all of the strategies chosen for credit by local jurisdictions will be from the land use and TDM options. Although it is unlikely that only land use and TDM options will be used, this end of the range enables the effectiveness of trip reduction strategies to be tested on their own. Based on the model results and the calculation of the congestion gap, it was determined by Los Angeles County Metropolitan Transportation Authority (MTA) staff that the 8,100,000 PMT congestion gap points is equivalent to approximately 3 percent of the total tripmaking in 2010. Therefore, the land use and TDM strategies were tested via the reduction of modeled trips in 2010 equivalent to 3 percent of all trips in the County. The model was then rerun including assignment to CMP links to test the effectiveness of the trip reduction package. Model output includes average speeds, vehicle miles traveled, vehicle hours traveled, and delay.

Capacity Enhancement Emphasis - This package includes the assumption that all of the strategies chosen for credit by local jurisdictions will be from the capital improvements and traffic systems management options. As with the trip reduction emphasis described above, it is unlikely that only these options will be used. Analysis of this end of the range enables the effectiveness of capacity enhancing

strategies to be tested on their own. There are several different ways that the capacity strategies could be tested in the regional model. One option would be to assume that all of the improvements would directly affect capacity on the CMP system. The other is to assume that capacity improvements would occur throughout the entire transportation system, including both CMP and non-CMP facilities. The later option was chosen because CMP legislation allows off-system improvements which will benefit the system and also because it is likely that jurisdictions will choose those improvements which are closest in physical proximity and from which they most directly benefit. Also, local jurisdictions may not have the ability to implement full lane additions on CMP routes, but may be capable of implementing other Tool Box measures. Such improvements will probably be on both the CMP and non-CMP facilities and include measures such as areawide signal system projects.

If new lane capacity is used to offset the 8,100,000 PMT debit points, the total number of new arterial lane-miles required (both high occupancy vehicle and mixed flow) would be about 564 lanes. This equals an equivalent capacity increase of 366,600 vehicles per hour to the system. To test the effectiveness of the capacity strategy, the equivalent of 366,600 vehicle capacity hours were added to the CMP and non-CMP facilities in the model. As described above, this capacity was assumed to be distributed equally across urban arterials in the County rather than only on CMP arterials, reflecting the range of capacity strategies that are possible. The model was then rerun including assignment to CMP links to test the effectiveness of the capacity emphasis package. Again, model output which has been reviewed includes average speeds, vehicle miles traveled, vehicle hours traveled, and delay.

The MTA regional model runs, which were completed for purposes of evaluating the capacity and trip reduction Tool Box measures, take into account potential "latent demand" on the transportation system. For purposes of this analysis, latent demand is defined as existing demand for travel which is currently not translated into actual trips on the highway system, or which is translated into shorter trips, as potential trip-makers respond to the level of congestion on the system. Latent demand exists when the demand to make a trip is present, but the trip is not made on the highway system, or is instead made at an off-peak time of day or to a closer destination, because of the time costs associated with the delay and low speeds which would be experienced by the person considering making the trip.

The technical model runs used in the bracket analysis of potential program impacts are based on an iterative modeling process whereby congested speeds are determined from an initial trip assignment and then are input back into the model for a second iteration. The subsequent model run goes through the mode choice

and trip distribution process once again and trips are finally assigned to the network with the congested speeds assumed. This is the most "realistic" modeling approach since it reflects the best estimate of actual speeds and trip length. Other common modeling approaches without this type of iterative loop may result in overly congested networks and will not reflect the full travel demand on the system. This approach captures latent demand by allowing mode choice to respond to changes in congestion levels.

This model output has been used in analyzing the transportation, air quality, and energy impacts of the proposed program. The impact assessment is based on a comparison of these two scenarios with the year 2010 baseline model run. This model run captures projected transportation system conditions without implementation of the 1993 CMP Update.

Likely Tool Box Use By Local Jurisdictions

Although a bracketing approach has been used to capture the range of potential program impacts, it is anticipated that on a countywide level, the total package of Tool Box measures selected will fall somewhere between the two bracket extremes. This conclusion is based on the following analysis of the possible behavioral choices of an "average" local jurisdiction.

The 1993 CMP Update establishes a Tool Box of alternatives from which local jurisdictions may choose in order to offset their congestion mitigation goal, based on new development activity. Since each local jurisdiction faces its own unique set of demographic, fiscal, and political considerations the Tool Box incorporates a range of implementation options, including land use measures, TDM strategies, Transportation Systems Management (TSM), and capital improvement opportunities. These Tool Box measures can be implemented through a variety of funding mechanisms, including use of local revenue, imposition of direct transportation costs, use of development charges or fees, or use of land use incentives. Each of these mechanisms is discussed latter in this section.

In selecting Tool Box measures it is anticipated that local jurisdictions will weigh specific public service needs in their community and funding considerations, and choose appropriate mitigation strategies that either enhance or minimize disruption to the jurisdiction's priorities. While the decision makers will have to weight the choice of implementation measures against the jurisdiction's specific objectives and constraints, there is a wide range of strategies included in the Tool Box to allow local jurisdictions flexibility in the choice of deficiency mitigation approaches. Local jurisdictions can choose any combination of strategies desired.

To understand the factors affecting a local jurisdiction's choice of mitigation measures, the following mitigation scenarios were developed for a hypothetical local jurisdiction with an employment base of 20,000 workers, contemplating permitting of a 100,000 square foot retail commercial building with a PMT debit point value of 2,223 points: mitigation through a mix of capital improvements and TDM measures, two different capital intensive approaches to mitigation, and two different TDM approaches to mitigation. The scenarios and their PMT credit point values are given in **Table 3.1.1.**

The scenarios in **Table 3.1.1** provide general information about the behavioral options open to this hypothetical jurisdiction. The jurisdiction may approach mitigation on either a jurisdictional or development-specific level.

As seen in the example, implementation of non-development specific large scale capital improvements or jurisdiction-wide TDM measures will result in a large number of PMT mitigation credits which can be used to offset the PMT debit points from a number of development projects constructed within the local jurisdiction. As also seen in the example, both of these types of mitigations are better suited to jurisdiction-wide implementation by "average" jurisdictions, jurisdictions that are not considering the permitting of regional centers or very large-scale developments. This is because, generally speaking, capital improvements are large scale in nature, and not likely to be identified in an EIR for a development project as mitigation the development is responsible for implementing, to mitigate the development's local or regional transportation impacts. These types of mitigations are more likely to be implemented occasionally by local jurisdictions acting alone, or in combination, when the improvement is a priority and funding is available. TDM may also best be suited to jurisdiction-wide implementation. As shown in **Table 3.1.1**, TDM measures implemented on a development specific basis are unlikely to result in PMT credit points which are commensurate with the development's PMT debit point contribution. Thus, TDM measures are most likely to be implemented by local jurisdictions, on a jurisdiction wide basis, with the jurisdiction receiving the incremental credit associated with the new development's participation in the existing program. Development of a jurisdiction-wide TDM requirement has the added advantage of helping the jurisdiction to meet its South Coast Air Quality Management District (SCQMD) Transportation Control Measure (TCM) responsibilities. TCM reporting requirements are discussed more fully in Section 3.6 of this chapter.

TABLE 3.1.1 HYPOTHETICAL PROJECT DEFICIENCY MITIGATION SCENARIOS

Example Case: 100,000 Square Foot Retail Commercial Building
Debit Points: 2,223 (22.23 per 1,000 sq. ft.)
Project Employment: 188.7[1]

SCENARIO 1: Mix of Capital Improvements and TDM measures

Mitigation Category	Implementation Strategy	Credits
Land Use Strategy	Focus development along transit corridor	870
TDM Strategy	Transportation Management Association	86
	Informal Carpool/Vanpool Program	52
	Carpool Allowance	169
TSM Strategy	Two Intersection Modifications	1,150
Total		2,327

SCENARIO 2: Capital Intensive Approach (2 Options)

Mitigation Category	Implementation Strategy	Credits
1) Capital Improvement	General Use Highway Lane (1 lane, 1 mile; non-CMP network)	9,203
Total		9,203
2) TSM Strategy	Traffic Signal Synchronization (1 mile, 4 lane; non-CMP network)	1,473
	Peak Period Parking Restriction (3 hours, ½; non-CMP network)	1,380
Total		2,853

SCENARIO 3: Traffic Demand Intensive Approach (2 Options)

Mitigation Category	Implementation Strategy	Credits
1) TDM Credits for Individual Project	Transportation Management Association	86.4
	Vanpool Formation Program	20.7
	Vanpool Subsidy Program	135.4
Total		242.5
2) Citywide ordinance for small employers; affects 20,000 employees	Trip Reduction Program	7,260
	Alternative Work Schedule	1,460
	Carpool/Vanpool Program	5,600
	Transit Subsidy Program	6,400
	Preferential Ridesharing Parking	1,000
Total		21,720

Note: 1) CMP employment factor is 5.3 employees per 1,000 square feet.

SOURCE: Willdan Associates

Jurisdictions which wish to implement Tool Box measures on a development by development basis also have that option. This is most likely to be accomplished through a mix of TSM measures, most probably those identified as development specific improvements in the EIR for a development, and TDM or land use strategies. It should be noted, however, that a development specific deficiency mitigation approach becomes more difficult, if a jurisdiction has a number of developments which do not require EIRs, since the California Environmental Quality Act (CEQA) process provides a ready mechanism for the identification of development-specific mitigations.

Given the hypothetical case study described above, it is relatively safe to assume, that on a countywide basis, both development-specific and jurisdiction-wide Tool Box measures may be used. It is also safe to assume that on a countywide basis, some mix of capacity enhancing and demand reducing measures will be used; the County as a whole is unlikely to be at one bracket extreme or the other.

Approach To The Relationship Between Funding Availability And The Degree of Program Impact

Just as it is impossible to predict the exact mix of Tool Box strategies which will be selected on a countywide basis, it is impossible to predict the exact mix of mechanisms which will be used to fund deficiency mitigation by local jurisdiction. For this reason, the EIR examines, at a program level of detail, the relationship between the different funding mechanisms available, the Tool Box measures selected by local jurisdictions, and the potential for environmental impacts, specifically in the areas of land use and public services. Available funding mechanisms have been classified into four broad categories for analytic purposes, each of which is described below:

- **Use of Local Revenue** - A local jurisdiction could elect to pay for required mitigation measures through its general fund or through the wide array of formula allocated public funds which may be used for CMP deficiency mitigation. These funding sources are discussed in more detail in Section 3.6 of this chapter.

- **Imposition of Direct Transportation Costs** - Some Tool Box mitigation measures, particularly TDM-intensive measures, could be funded by imposing direct costs, such as parking fees on drivers.

- **Use of Development Charges or Fees** - To pay for required mitigation measures, a local jurisdiction may require a development contribution. The amount and nature of the contribution could vary significantly depending on

the degree to which local jurisdictions pursue capacity enhancing or demand reducing mitigations.

- **Use of Land Use Incentives** - Local jurisdictions may elect to provide mitigation by creating development incentives which foster patterns of land use for which mitigation credit is available. Incentives would likely entail measures having a monetary value to developers, such as reduced parking requirements, increased density bonuses, and expedited project processing and approval times.

The hypothetical case study and the analysis of funding categories are used in analyzing the proposed 1993 CMP Update's potential land use and public service impacts.

3.2 TRANSPORTATION

This section of the EIR examines the potential of the 1993 CMP Update to create significant impacts on: (1) the CMP's consistency with the Regional Mobility Plan (RMP); and (2) the County's transportation system.

SETTING

Regional Transportation Planning

The Los Angeles County transportation system is a central part of the six-county Southern California Association of Governments (SCAG) planning area.[1] As the regional planning agency, SCAG is responsible for development of the regional plan and associated mobility component. The existing plan contains four elements, the Regional Mobility Plan (RMP), the Growth Management Plan (GMP), the Air Quality Management Plan (AQMP), and the Regional Housing Needs Assessment (RHNA). The RMP serves as the Federal and State required Regional Transportation Plan (RTP). It has a 20-year planning horizon and is intended to establish the policies and actions to address the region's mobility issues. It is updated periodically. The official RTP for the SCAG Region, was adopted on February 6, 1989, and SCAG subsequently issued a conformity finding on the plan in September 1990.

[1]The SCAG region consists of Los Angeles, Orange, Ventura, San Bernardino, Riverside, and Imperial Counties.

SCAG is currently in the process of creating an updated regional plan which will be called the Regional Comprehensive Plan. The mobility element of the new plan will be called the Mobility Component of the Regional Comprehensive Plan. That plan is currently under development, with adoption targeted for December 1993. Until adoption, the 1989 plan will remain the official regional transportation plan for the region and the County of Los Angeles.

CMP statute requires that the CMP be developed consistent with the regional plan and that the CMP be incorporated into the regional plan.[2] SCAG has developed a set of "Regional Consistency and Compatibility Criteria for CMPs" which outline the process and criteria that is used to evaluate the consistency between the CMP and regional planning efforts. The consistency evaluation has three parts, which are briefly described below. Appendix D of this EIR contains the full text of the consistency requirements.

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 regional plan and the AQMP.

2. The CMP must demonstrate progress toward the regional mobility targets contained in the regional plan. 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 be maintained or increased; and,

   c) total person trips and total vehicle trips both within and between the counties.

   SCAG will develop planning horizon targets for use in determining if there are discrepancies between the SCAG forecasts and the CMP planning horizon.

3. The CMP transportation system must connect to the system designated in the adjacent counties and traffic Levels of Service (LOS) standards must be

[2]See Section 65089.2 of the California Government Code.

addressed using either Circular 212, the 1985 Highway Capacity Manual or a method that SCAG has found consistent with the 1985 Highway Capacity Manual.

The issue of consistency was previously addressed in the adopted 1992 CMP EIR. No significant consistency related impacts were identified for the 1992 CMP.

In February 1992 and again in November 1992, SCAG's Executive Committee formally approved an interim consistency and compatibility finding for the 1992 CMP. In April 1993, based on a recommendation from SCAG's 1246 Committee to the Executive Committee, the interim finding was accepted as a final finding of consistency and compatibility.

In addition to formal consistency with the regional plan, there are several key areas where coordination should occur between the RMP and the CMP. The areas of importance for coordination are as follows:

- Implementation of local trip reduction strategies, land use policies and transportation demand management programs.

- Local (county) implementation of capital improvement strategies on the regional street and highway system.

- Implementation of transit system improvements.

Existing and Projected Los Angeles County Transportation System Performance

Information on existing system performance is available from two sources, the regional transportation model and the system monitoring performed under the adopted CMP.

System Performance

In November 1992, the MTA adopted the first CMP for Los Angeles County. The 1992 CMP EIR includes a discussion of the CMP Highway and Transit Systems and the monitoring networks. The 1993 CMP Update includes the addition of La Cienega Boulevard from the San Diego Freeway (I-405) to the Santa Monica Freeway (I-10). A description of the existing travel characteristics and existing level of congestion on the highway system is included in the 1992 CMP EIR. Because the first year's monitoring program had not been completed, the description of existing conditions in the 1992 EIR consisted of link-based highway network LOS

information obtained from Caltrans. Although that information remains valid, this EIR includes a description of the arterial intersection and freeway level of service data obtained from the CMP monitoring effort which was not available when the 1992 CMP EIR was written. That data is described below.

The Adopted CMP Monitoring Program System Performance Findings

The adopted CMP for Los Angeles County includes requirements for monitoring intersections, freeway links, and transit routes. Intersection monitoring is the responsibility of cities and the County, freeway monitoring is the responsibility of Caltrans, and transit route monitoring is the responsibility of transit operators in the County.

Intersection Monitoring - The CMP Highway Monitoring Program was fully implemented for the first time in 1992. It is an annual program which includes monitoring of intersections throughout the CMP system. The following criteria are used to determine the locations for monitoring:

- Intersections of two (or more) CMP arterials shall be monitored.

- Monitored intersections should be capacity constraining intersections with major cross streets such as major arterials, secondary arterials, or freeway ramps. This excludes many intersections of CMP arterials with local or collector streets which are signalized but which carry relatively light volumes of cross traffic.

- A maximum spacing of 2 miles should be maintained between stations, except on rural highways where the spacing may be increased if traffic volumes and capacity are consistent over greater distances.

A total of 160 intersections were monitored during 1992, by 46 cities and the County of Los Angeles. The city responsible for monitoring the most locations is the City of Los Angeles, which is responsible for 45 intersections. It is followed by the County of Los Angeles, which monitors 14, and the Cities of Torrance and Long Beach, which monitor 10 intersections each. Most of the remaining locations are divided among the remaining cities such that each city is responsible for between one and five locations, depending on the size of the city and the presence of CMP routes within the city's boundaries.

Each monitoring agency is responsible for the following tasks as part of the monitoring program:

- Conduct traffic counts on at least two weekdays during typical traffic conditions. The counts must cover the peak time periods of 7 to 9 a.m. and 4 to 6 p.m. unless otherwise indicated by local conditions.

- Describe existing lane configurations and signal phasing.

- Complete an Intersection Capacity Utilization (ICU) calculation for each monitoring intersection using parameters described in the CMP Manual.

Intersection conditions are reported in terms of volume/capacity ratio (V/C) and LOS during both the AM and PM peak hour periods. LOS are based upon volume/capacity ratios and range from LOS A which represents excellent to very good conditions with little or no vehicle delay to LOS F which represents jammed conditions with significant congestion and vehicle delay. Based on CMP statute, system LOS standards are required to be set no lower than LOS E, or the current level if worse than E. The 1992 monitoring program findings are presented in **Table 3.2.1.**

TABLE 3.2.1 1992 INTERSECTION MONITORING RESULTS

	AM Peak Hour		PM Peak Hour	
Reported At:	Number of Intersections	Percent of Intersections	Number of Intersections	Percent of Intersections
LOS F	29	18%	48	30%
LOS E	34	21%	35	22%
LOS D or better	97	61%	77	22%

SOURCE: MTA

Based on these findings, 93 of the 160 monitoring locations are currently at the maximum allowable LOS (i.e. LOS E or the current level if worse than E) in either the AM peak, PM peak, or both. This represents 58 percent of the CMP system intersection monitoring locations. **Figures 3.2.1 and 3.2.2** display the results of the AM and PM peak hour intersection LOS analyses, respectively.

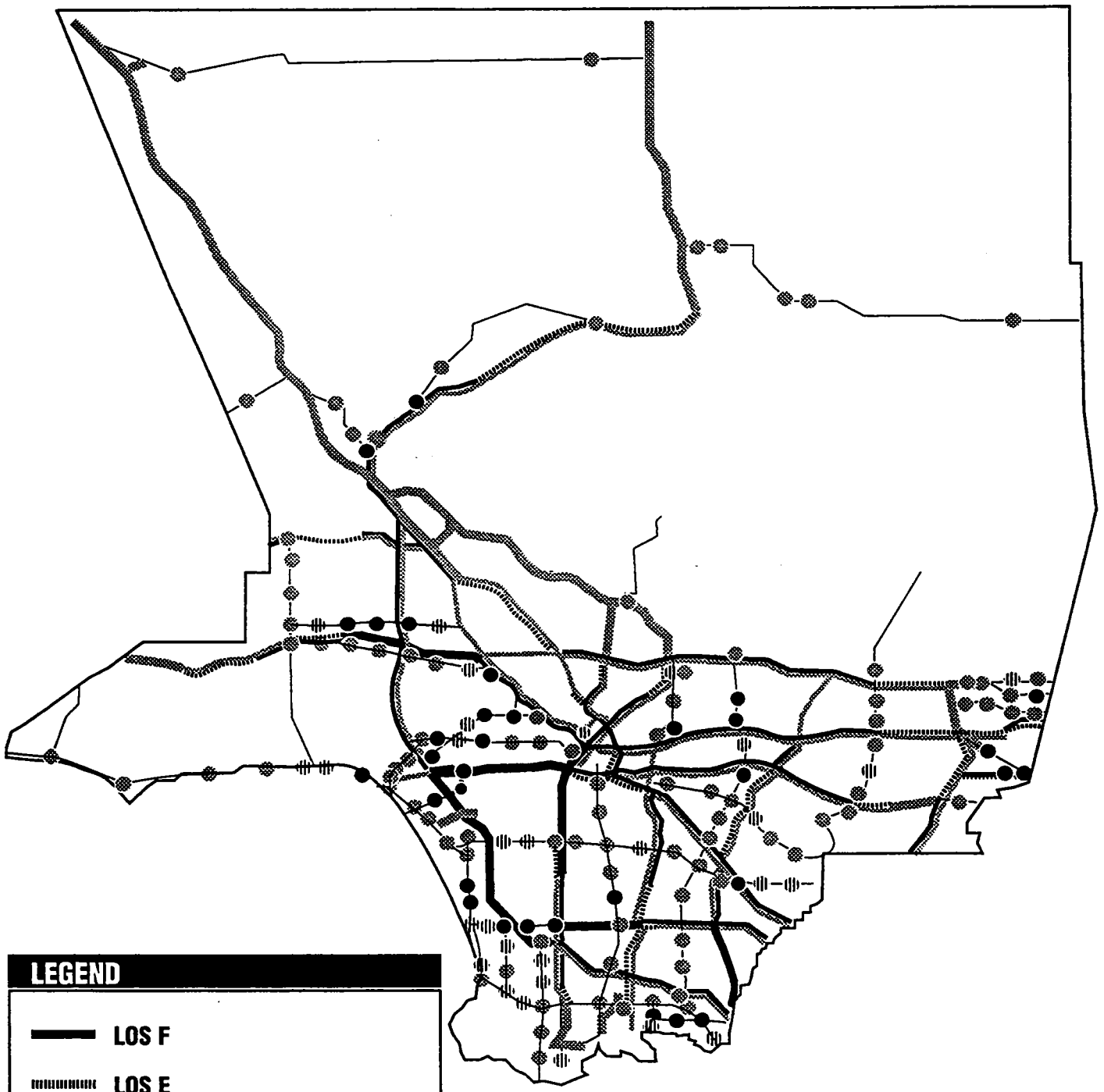
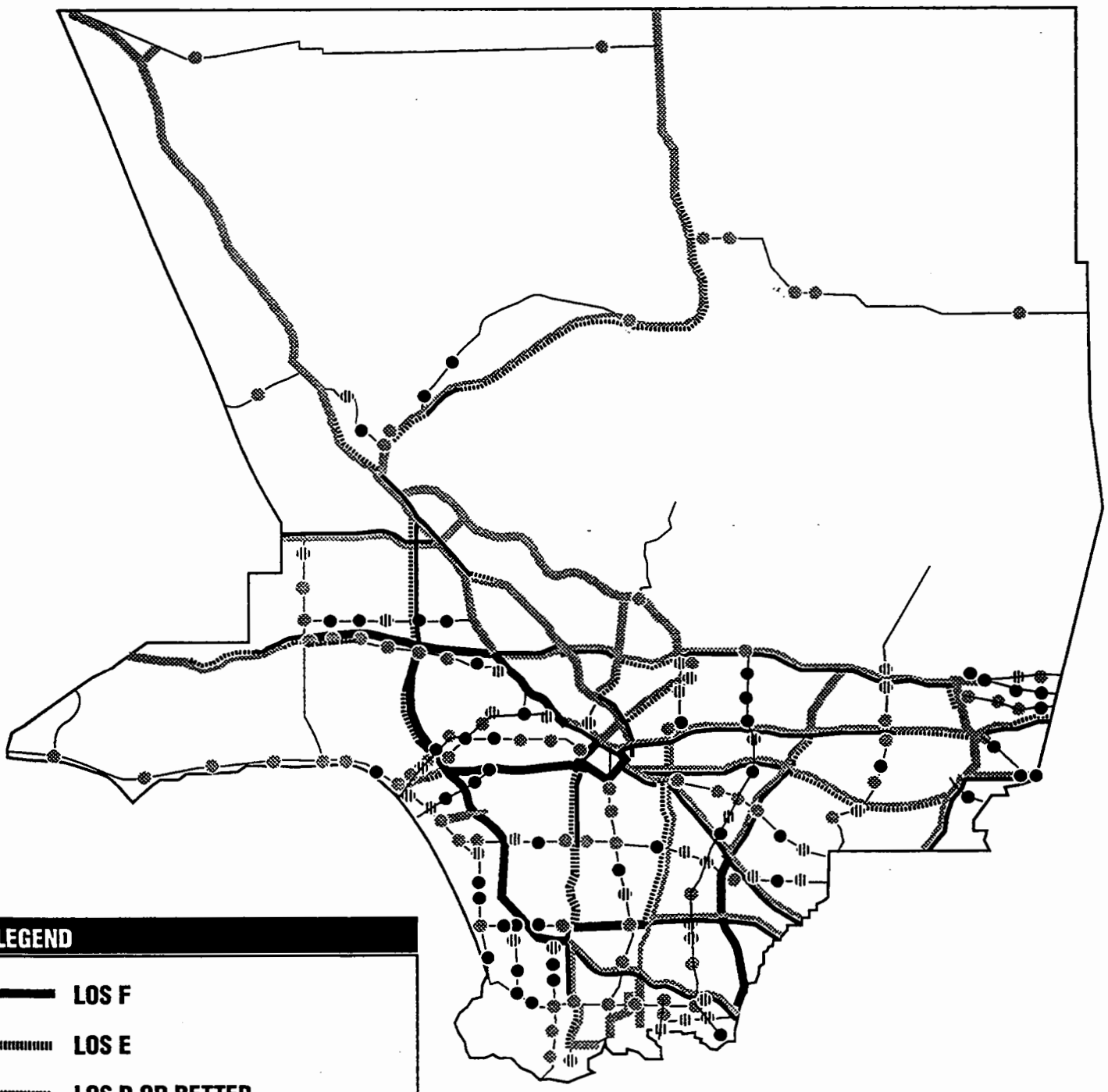


FIGURE 3.2.1
1992 CMP HIGHWAY SYSTEM AM PEAK HOUR LEVELS OF SERVICE

SOURCE: MTA



LEGEND

- **LOS F**
- **LOS E**
- **LOS D OR BETTER**

Circles indicate arterial intersections.

Bars indicate freeway segments. Freeway segment congestion is schematically represented through interpolation of CMP monitoring station data provided in Appendix A.

FIGURE 3.2.2
1992 CMP HIGHWAY SYSTEM PM PEAK HOUR LEVELS OF SERVICE

SOURCE: MTA

Freeway Monitoring - As part of the 1992 CMP, Caltrans monitored volumes and LOS at 79 freeway locations throughout the CMP system. A total of 17 State Routes were included in the monitoring program. The monitoring was conducted in both directions on each route during both the AM and PM peak hour periods. Freeway level of service conditions are measured differently from arterial intersection LOS. They are based upon demand-to-capacity ratios and extend from LOS A to LOS F0, F1, F2, and F3 rather than a simple measurement of LOS F. This gradation within LOS F represents LOS F conditions with successively longer duration. The results of the freeway monitoring program are presented in **Table 3.2.2.**

Transit Monitoring - CMP statute also requires monitoring of transit systems to determine conformance with established standards. For purposes of transit monitoring, the County's transit system has been broken into 11 corridors. Within each corridor specific CMP routes and the transit lines which operate on those routes have been identified for monitoring. A total of 90 bus lines plus the Metro Blue Line, the Metro Red Line, and Metrolink Commuter Rail System are included in the monitoring program.

TABLE 3.2.2 1992 FREEWAY MONITORING RESULTS

	AM Peak Hour		PM Peak Hour	
Reported At:	Number of Segments	Percent of Segments	Number of Segments	Percent of Segments
LOS E or F in the northbound/eastbound directions	25	32%	50	63%
LOS E or F in the southbound/westbound directions	53	67%	30	38%
LOS E or F in one or both directions	86	86%	63	86%

SOURCE: MTA

THRESHOLDS OF SIGNIFICANCE

For purposes of this analysis a significant adverse transportation impact is defined as: (1) creation of an inconsistency with the regional transportation plan; (2) an increase in vehicle miles traveled (VMT), vehicle hours traveled (VHT); or (3) vehicle delay compared to projected Year 2010 baseline conditions or a decrease in speed compared to the Year 2010 baseline. These thresholds are based on

SCAG's "Regional Consistency and Compatibility Criteria for CMPs," as well as standard transportation planning practices.

IMPACTS

Regional Transportation Planning

As explained in the setting section, the CMP must demonstrate consistency with the regional planning process and the CMP must be incorporated into the regional transportation plan. The 1992 CMP EIR discussed the purpose of the regional plan and the consistency between the CMP and the plan. The finding in the 1992 CMP EIR is that the CMP is designed to be consistent with the regional transportation plan and that the CMP has been developed to work toward the implementation of transportation projects and strategies recommended in the RMP, and is therefore consistent.

The major element of the CMP which is proposed as part of the 1993 program update, the deficiency plan process, is also designed to work toward the implementation of projects and policies which are consistent with regional transportation plan goals. The findings of consistency for the 1992 CMP also apply to the deficiency plan process as currently proposed, for the following reasons:

- All modeling analysis which was conducted for purposes of determining the congestion gap and the number of debit points to be mitigated through the CMP deficiency plan process was based on the MTA regional model which was originally obtained from SCAG. The modeling inputs including socioeconomic data, highway networks and transit networks are consistent with the SCAG regional model as is all modeling methodology such as trip generation rates/equations, assignment algorithms and mode choice criteria.

- Implementation of capacity increasing measures that are part of the toolbox could arguably result in an increase in VMT, average trip length, or VHT, which would not meet the Regional Consistency and Compatibility Criteria due to the effects of "latent demand" which may be present in the County. This issue is discussed in the 1992 CMP EIR with respect to the adopted CMP. The deficiency plan process is not expected on an aggregate basis, however, to result in such increases since on a Countywide basis toolbox choices will likely result in a mixture of capacity enhancing measures as well as trip reduction measures. The modeling analysis associated with the capacity enhancing measures indicates that VMT could increase slighly

(approximately one percent on average over the whole system) if only capacity Tool Box measures are chosen. VHT would increase less than one percent although overall delay would actually decrease based on the modeling analysis of the capacity enhancing measures.

- The deficiency plan process as proposed will result in the implementation of capacity improvements which are generally in conformance with RMP projects, therefore, the deficiency plan is not expected to significantly alter the RMP's analysis of transportation demand. If, however, the CMP deficiency plan process resulted in only capacity enhancing measures being implemented, an increase in VMT, VHT, or average trip length could arise, thereby resulting in an inconsistency finding with respect to the RMP (although delay may decrease and speeds may remain the same on average).

- The deficiency plan process is oriented toward the mitigation of future deficiencies on the CMP system, with deficiencies defined as a change to LOS E, or worse than E if already at LOS E. If already at LOS F, a deficiency is defined as a worsening within LOS F. Because deficiencies are only defined at relatively poor levels of service (not at LOS D as in many local cities), and because the goal of the CMP is to maintain, rather than improve mobility, it is possible that even if only capacity enhancing measures are chosen as part of the toolbox, no net increase in VMT or VHT will occur. This is because VMT and VHT will increase from today's levels as a result of the congestion which creates the deficiency. Improvements to mitigate the deficiency may therefore decrease VMT and VHT when compared to deficient conditions, but not when compared to existing (pre-deficiency) conditions.

- The deficiency plan process includes both transit system improvements and a considerable number of transportation demand management actions among the Tool Box of measures, therefore, it promotes maintaining or increasing transit trips and average vehicle occupancy.

- Implementation of the deficiency plan does not alter the connection of the CMP system with adjacent counties nor does it impact the analysis of traffic LOS standards.

Future updates of the CMP must also be consistent with the new regional transportation plan once it is adopted. Adoption of the Regional Comprehensive Plan and Mobility Element are not expected until December 1993, therefore, a

determination of consistency of this year's CMP with the new regional plan cannot be made at this time.

Direct Impacts - The 1992 adopted EIR found that the CMP program was designed to be consistent with the RMP, thus the CMP should have a positive direct impact on working toward attainment of regional mobility goals. The deficiency plan program was also designed to result in the implementation of RMP projects and therefore should assist in attaining RMP goals and is consistent with the adopted regional transportation plan. The furthering of RMP goals is a **significant benefit** of the 1993 CMP Update.

System Performance

As described in section 3.1 of this chapter, model runs were made for two deficiency plan scenarios, a trip reduction emphasis scenario and a capacity emphasis scenario. These two scenarios bracket the range of possible 1993 CMP Update transportation system impacts. **Tables 3.2.3 and 3.2.4** display the results of the model runs in terms of baseline 2010 transportation system conditions (i.e. without the CMP deficiency plan process implemented). The tables compare VHT, average speed, VMT, and vehicle hours of delay for the two scenarios to the 2010 baseline. The results of each modeling analysis are summarized below in **Table 3.2.5**.

Direct Impacts - The regional model analysis indicates that the trip reduction emphasis package would result in measurable improvements in the CMP system as well as non-CMP facilities. The improvements generally occur across the board and affect most measures of transportation system effectiveness including the overall amount of vehicle travel, the level of vehicle delay and speeds. The capacity emphasis package results in increases in VMT and VHT, but an overall decrease in delay.

Therefore, based on the modeling analysis, if only the capacity enhancing measures available in the deficiency plan Tool Box are chosen by local jurisdictions, there would be a net increase in VMT, VHT or average trip length. Based on the probability that many different Tool Box measures will be chosen (including trip reducing measures), the overall program should not result in increases in those travel characteristics and the 1993 CMP Update should result in a **significant benefit** to the transportation system.

TABLE 3.2.3 COMPARISON OF DEMAND REDUCING AND CAPACITY ENHANCING EMPHSES - MODEL RUNS - EFFECT ON VHT

	1990 Base Year		2010 Baseline		Demand Reduction Emphasis				Capacity Increase Emphasis			
Facility	VHT	Delay	VHT	Delay	VHT	Delay	VHT % Change	Delay % Change	VHT	Delay	VHT % Change	Delay % Change
AM Peak												
Freeway	357,286	158,798	401,301	183,386	404,199	185,317	1%	1%	402,636	183,527	<1%	<1%
Major Arterial	82,649	25,300	94,383	34,478	93,691	33,807	-1%	-2%	94,919	32,572	1%	-6%
Primary Arterial	313,227	127,739	405,264	198,396	395,397	189,072	-2%	-5%	398,012	181,628	-2%	-8%
Secondary Arterial	90,497	32,515	102,883	36,142	98,745	33,049	-4%	-9%	99,346	32,614	-3%	-10%
HOV	1,268	398	37,466	13,579	38,270	13,944	2%	3%	38,137	13,962	2%	3%
Total System	**844,927**	**344,750**	**1,041,297**	**465,981**	**1,030,302**	**455,189**	**-1%**	**-2%**	**1,033,050**	**444,303**	**-1%**	**-5%**
PM Peak												
Freeway	691,042	317,876	828,830	402,613	815,978	390,550	-2%	-3%	834,381	408,071	1%	1%
Major Arterial	203,569	82,731	242,002	114,402	241,606	115,818	<-1%	1%	250,028	116,044	3%	1%
Primary Arterial	768,083	386,880	1,016,403	583,066	990,486	559,364	-3%	-4%	1,033,806	577,677	2%	-1%
Secondary Arterial	241,862	110,762	294,406	138,232	284,277	130,080	-3%	-6%	294,333	139,467	<-1%	1%
HOV	3,923	1,145	78,280	27,648	77,741	27,036	-1%	-2%	77,647	27,134	-1%	-2%
Total System	**1,908,479**	**899,394**	**2,459,921**	**1,265,961**	**2,410,088**	**1,222,848**	**-2%**	**-3%**	**2,490,195**	**1,268,393**	**1%**	**<1%**
TOTAL (Daily)												
Freeway	1,957,121	592,190	2,352,323	752,008	2,340,946	746,400	<-1%	-1%	2,366,627	760,363	1%	1%
Major Arterial	533,276	136,798	612,949	190,239	609,152	191,292	-1%	1%	627,162	188,478	2%	-1%
Primary Arterial	2,115,934	754,655	2,809,644	1,229,518	2,741,397	1,174,840	-2%	-4%	2,809,559	1,161,448	<-1%	-6%
Secondary Arterial	693,950	246,428	836,666	307,709	810,850	290,014	-3%	-6%	834,188	308,263	<-1%	<1%
HOV	7,165	1,578	179,238	46,454	180,591	46,532	1%	<1%	179,192	46,284	<-1%	<-1%
Total System	**5,742,371**	**1,731,649**	**7,314,029**	**2,525,928**	**7,196,689**	**2,450,934**	**-2%**	**-3%**	**7,345,118**	**2,467,030**	**<1%**	**-2%**

Notes: 1) VHT = Vehicle Hours Traveled
2) Totals do not match sum of rows since not all facilities are listed.
3) Total (daily) includes off peak hours

SOURCE: MTA

3.3 AIR QUALITY

This section of the EIR examines the 1993 CMP Update's potential to create significant impacts on the region's air quality.

SETTING

This section incorporates by reference basic air quality information presented in the South Coast Air Quality Management District's (SCAQMD) California Environmental Quality Act (CEQA) Air Quality Handbook as well as the additional background information pertaining to air quality conditions in Los Angeles County presented in the 1992 CMP EIR.[3] A description of the South Coast Air Basin was provided in the 1992 CMP EIR along with salient climate and emissions data, and information pertaining to the applicable regulations. Monitoring data presented in that document covered the period through 1991.

Available 1992 monitoring data suggest there has been an improvement in air quality in the Los Angeles County area. A comparison of 1991 and 1992 data is shown in **Tables 3.3.1 through 3.3.5.** The key changes in air quality are summarized below:

- **Carbon Monoxide (CO)** - The highest recorded concentration in the 1983 to 1992 period was 33 ppm recorded at the Lynwood station in 1985. The average maximum concentration for all stations in Los Angeles County has ranged from 12 ppm in 1992 to 18 ppm in 1983 and 1985. The average maximum concentration in 1992 was 12 ppm and is 78 percent of the average for the 10-year period. Compared to 1991, two ppm of the 15 monitoring stations in 1992 recorded increases in concentrations; eight stations recorded decreases; and five stations reported no change.

- **Ozone (OZ)** - The highest recorded concentration in the 1983 to 1992 period was 0.39 ppm recorded at the Glendora station in 1985. The average maximum concentration for all stations in Los Angeles County has ranged from 0.19 ppm in 1990 to 0.28 ppm in 1983. The average maximum concentration in 1992 was 0.21 ppm and is 88 percent of the average for

[3]*CEQA Air Quality Handbook*, April 1993, SCAQMD, is herein incorporated by reference. Portions of this document are summarized in relevant sections of this EIR. The document is available for review at the offices of the MTA, located at: 818 West Seventh Street, Los Angeles, California 90017.

TABLE 3.3.1 MAXIMUM 1-HOUR CARBON MONOXIDE CONCENTRATIONS (PPM)

STATION	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	Period Average
Los Angeles	17	15	14	13	15	16	14	13	12	12	14.10
West Los Angeles	22	17	15	11	13	15	12	15	10	11	14.10
Hawthorne/Lennox	31	24	29	21	22	23	23	19	18	18	22.80
Long Beach	14	14	19	13	13	13	13	11	14	10	13.40
Whittier	16	14	18	15	13	13	13	12	13	12	13.90
Reseda	20	15	16	19	15	16	17	19	16	13	16.60
Burbank	24	19	21	19	15	15	20	16	13	13	17.50
Pasadena	19	13	17	14	15	17	14	16	14	11	15.00
Azusa	10	7	9	10	9	8	7	7	8	6	8.10
Glendora	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pomona	15	13	12	11	14	13	12	13	11	12	12.60
Pico Rivera	14	13	19	14	12	14	13	13	11	11	13.40
Lynwood	24	29	33	27	26	32	31	24	30	28	28.40
Santa Clarita/Newhall	NA	NA	NA	NA	NA	NA	12	11	9	8	10.00
Lancaster	13	10	12	9	12	11	13	11	10	9	11.00
Maximum	31	29	33	27	26	32	31	24	30	28	33.00
Minimum	10	7	9	9	9	8	7	7	8	6	6.00
Average	18	16	18	15	15	16	15	14	14	12	15.33

SOURCE: South Coast Air Quality Management District, CEQA Air Quality Handbook, and Terry A. Hayes Associates.

TABLE 3.3.2 MAXIMUM 1-HOUR OZONE CONCENTRATIONS (PPM)

STATION	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	Period Average
Los Angeles	0.26	0.29	0.30	0.22	0.22	0.21	0.25	0.20	0.19	0.20	0.23
West Los Angeles	0.23	0.27	0.27	0.20	0.28	0.24	0.25	0.16	0.18	0.17	0.23
Hawthorne/Lennox	0.18	0.22	0.17	0.19	0.20	0.22	0.19	0.10	0.11	0.15	0.17
Long Beach	0.30	0.27	0.23	0.18	0.17	0.16	0.16	0.12	0.11	0.15	0.19
Whittier	0.32	0.29	0.32	0.25	0.23	0.29	0.26	0.19	0.19	0.22	0.26
Reseda	0.26	0.26	0.25	0.22	0.22	0.25	0.23	0.19	0.22	0.17	0.23
Burbank	0.31	0.26	0.30	0.28	0.23	0.24	0.20	0.20	0.22	0.22	0.25
Pasadena	0.34	0.30	0.37	0.26	0.28	0.29	0.27	0.26	0.23	0.27	0.29
Azusa	0.39	0.31	0.36	0.31	0.30	0.30	0.33	0.23	0.28	0.27	0.31
Glendora	NA	0.34	0.39	0.35	0.33	0.34	0.34	0.29	0.32	0.30	0.30
Pomona	0.34	0.31	0.33	0.27	0.29	0.29	0.25	0.24	0.24	0.26	0.28
Pico Rivera	0.33	0.27	0.31	0.24	0.28	0.30	0.26	0.19	0.26	0.16	0.26
Lynwood	0.23	0.27	0.21	0.20	0.24	0.21	0.14	0.15	0.16	0.17	0.20
Santa Clarita/Newhall	0.29	0.27	0.24	0.24	0.21	0.30	0.25	0.23	0.24	0.22	0.25
Lancaster	0.18	0.18	0.19	0.20	0.17	0.18	0.21	0.15	0.14	0.17	0.18
Maximum	0.39	0.34	0.39	0.35	0.33	0.34	0.34	0.29	0.32	0.30	0.39
Minimum	0.18	0.18	0.17	0.18	0.17	0.16	0.14	0.10	0.11	0.15	0.10
Average	0.28	0.27	0.28	0.24	0.24	0.25	0.24	0.19	0.21	0.21	0.24

SOURCE: South Coast Air Quality Management District, CEQA Air Quality Handbook, and Terry A. Hayes Associates.

TABLE 3.3.3 MAXIMUM 1-HOUR NITROGEN DIOXIDE CONCENTRATIONS (PPM)

STATION	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	Period Average
Los Angeles	0.33	0.23	0.27	0.33	0.42	0.54	0.28	0.28	0.38	0.30	0.34
West Los Angeles	0.47	0.32	0.23	0.24	0.27	0.26	0.22	0.20	0.25	0.30	0.28
Hawthorne/Lennox	0.32	0.27	0.24	0.23	0.23	0.27	0.24	0.23	0.21	0.19	0.24
Long Beach	0.37	0.35	0.35	0.26	0.26	0.28	0.27	0.27	0.28	0.18	0.29
Whittier	0.32	0.29	0.31	0.28	0.25	0.22	0.29	0.23	0.22	0.21	0.26
Reseda	0.23	0.21	0.21	0.22	0.15	0.20	0.18	0.19	0.17	0.17	0.19
Burbank	0.30	0.21	0.31	0.28	0.26	0.26	0.25	0.23	0.29	0.19	0.26
Pasadena	0.35	0.21	0.27	0.24	0.21	0.27	0.34	0.23	0.32	0.22	0.27
Azusa	0.26	0.16	0.27	0.21	0.23	0.24	0.27	0.21	0.25	0.15	0.23
Glendora	NA	NA	NA	0.13	0.17	0.20	0.22	0.19	0.23	0.16	0.19
Pomona	0.21	0.20	0.23	0.25	0.22	0.20	0.26	0.21	0.22	0.18	0.22
Pico Rivera	0.31	0.25	0.31	0.26	0.24	0.24	0.31	0.27	0.25	0.27	0.27
Lynwood	0.27	0.27	0.31	0.26	0.26	0.31	0.34	0.26	0.26	0.25	0.28
Santa Clarita/Newhall	NA	NA	NA	NA	NA	NA	0.13	0.15	0.17	0.11	0.14
Lancaster	0.09	0.11	0.08	0.09	0.09	0.09	0.08	0.09	0.11	0.16	0.10
Maximum	0.47	0.35	0.35	0.33	0.42	0.54	0.34	0.28	0.38	0.30	1
Minimum	0.09	0.11	0.08	0.09	0.09	0.09	0.08	0.09	0.11	0.11	0
Average	0.29	0.24	0.26	0.23	0.23	0.26	0.25	0.22	0.24	0.20	0.24

SOURCE: South Coast Air Quality Management District, CEQA Air Quality Handbook, and Terry A. Hayes Associates.

TABLE 3.3.4 MAXIMUM 1-HOUR SULFUR DIOXIDE CONCENTRATIONS (PPM)

STATION	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	Period Average
Los Angeles	0.07	0.07	0.04	0.03	0.03	0.04	0.03	0.02	0.02	0.05	0.04
West Los Angeles	0.06	0.05	0.03	0.02	0.03	0.03	0.02	0.02	NA	NA	NA
Hawthorne/Lennox	0.09	0.06	0.06	0.09	0.03	0.15	0.09	0.31	0.12	0.15	0.12
Long Beach	0.12	0.32	0.08	0.07	0.06	0.05	0.11	0.05	0.14	0.11	0.11
Whittier	0.09	0.06	0.05	0.06	0.07	0.10	0.04	0.04	0.07	0.03	0.06
Reseda	0.03	0.03	0.02	0.02	0.02	0.02	0.02	0.02	NA	NA	NA
Burbank	0.04	0.05	0.04	0.02	0.02	0.02	0.03	0.02	0.01	0.03	0.03
Pasadena	0.05	0.03	0.03	0.02	0.02	0.03	0.02	0.02	NA	NA	NA
Azusa	0.03	0.04	0.02	0.03	0.03	0.03	0.02	0.03	NA	NA	NA
Glendora	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pomona	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pico Rivera	0.08	0.09	0.07	0.03	0.09	0.05	0.04	0.04	NA	NA	NA
Lynwood	0.06	0.07	0.06	0.13	0.06	0.06	0.04	0.04	0.05	0.06	0.06
Santa Clarita/Newhall	NA	NA	NA	NA	NA	NA	0.02	0.01	NA	NA	NA
Lancaster	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Maximum	0.12	0.32	0.08	0.13	0.09	0.15	0.11	0.31	0.14	0.15	0.32
Minimum	0.03	0.03	0.02	0.02	0.02	0.02	0.02	0.01	0.01	0.03	0.01
Average	0.07	0.08	0.05	0.05	0.04	0.05	0.04	0.05	0.07	0.07	0.06

SOURCE: South Coast Air Quality Management District, CEQA Air Quality Handbook, and Terry A. Hayes Associates.

TABLE 3.3.5 MAXIMUM 24-HOUR PM10 CONCENTRATIONS (UG/M3)

STATION	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	Period Average
Los Angeles	NA	NA	146	178	158	130	137	152	151	137	149
West Los Angeles	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hawthorne/Lennox	NA	NA	NA	NA	NA	NA	133	127	79	67	102
Long Beach	NA	NA	106	136	113	149	119	119	92	67	113
Whittier	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Reseda	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Burbank	NA	NA	165	211	147	138	133	161	133	222	164
Pasadena	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Azusa	NA	NA	149	183	188	127	172	127	137	107	149
Glendora	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pomona	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pico Rivera	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lynwood	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Santa Clarita/Newhall	NA	NA	NA	NA	NA	NA	100	93	81	84	90
Lancaster	NA	NA	NA	NA	NA	NA	110	342	780	68	325
Maximum	NA	NA	165	211	188	149	172	342	780	222	780
Minimum	NA	NA	106	136	113	127	119	119	79	67	67
Average	NA	NA	113	142	121	109	139	137	118	120	125

SOURCE: South Coast Air Quality Management District, CEQA Air Quality Handbook, and Terry A. Hayes Associates.

the 10-year period. Compared to 1991, eight stations in 1992 recorded increase in concentrations; six stations recorded decreases; and one station reported no change.

- **Nitrogen Dioxide (NOX)** - The highest recorded concentration in the 1983 to 1992 period was 0.54 ppm recorded at the Los Angeles station in 1988. The average maximum concentration for all stations in Los Angeles County has ranged from 0.20 ppm in 1992 to 0.29 ppm in 1993. The average maximum concentration in 1992 was 0.20 ppm and is 83 percent of the average for the 10-year period. Compared to 1991, three stations in 1992 recorded increase in concentrations; 11 stations recorded decreases; and one station reported no change.

- **Sulfur Dioxide (SOX)** - The highest concentration in the 1983 to 1992 period was 0.54 ppm recorded at the Los Angeles station in 1988. The average maximum concentration for all stations in Los Angeles County has ranged from 0.04 ppm in 1989 to 0.08 ppm in 1984. The average maximum concentration in 1992 was 0.07 ppm and is 116 percent of the average for the period. Compared to 1991, four of the six reporting stations in 1992 recorded increase in concentrations; and two stations recorded decreases.

- **Particulate Matter Less Than 10 Microns (PM10)** - The highest recorded concentration in the 1983 to 1992 period was 780 microns per cubic meter (ug/m3) recorded at the Lancaster station in 1991. The average maximum concentration for all stations in Los Angeles County has ranged from 109 ug/m3 in 1988 to 142 ug/m3 in 1986. The average maximum concentration in 1992 was 120 ug/m3 and is 96 percent of the average for the period. Compared to 1991, two of the seven reporting stations in 1992 recorded increases in concentrations, and the remaining five stations recorded decreases.

Existing mobile emissions in Los Angeles County are shown in **Table 3.3.6**. These emissions are based on the results of the Countywide Travel Model, which calculates an estimated 167.1 million vehicle miles of travel in the County. Pollutant emissions are based on EMFAC7EP series emission factors applied to the daily vehicle miles traveled at an average speed of approximately 30 miles per hour.

TABLE 3.3.6 EXISTING LOS ANGELES COUNTY DAILY MOBILE EMISSIONS

Pollutant	Tons Per Day
Carbon Monoxide	1,818
Reactive Organic Gas	293
Nitrogen Dioxide	258
PM10	26
Sulfur Dioxide	13

SOURCE: VMT from Countywide Travel Model (167.1 million vehicle miles) with applied EMFAC7EP emission factors for 30 miles per hour. Emission factors calculated using method described by SCAQMD in CEQA Air Quality Handbook, April, 1993.

THRESHOLDS OF SIGNIFICANCE

The SCAQMD in its 1993 CEQA Air Quality Handbook has established daily emissions thresholds in pounds per day. These threshold are specifically designed for the evaluation of impacts from site specific projects. The proposed 1993 CMP Update is not site specific and moreover the proposed project encompasses potential mobile emissions that may be created over the more than 4,000 square mile area of Los Angeles County. Thus, for purposes of this analysis, it was determined that emissions that exceed the 2010 baseline emissions, which assume the same socioeconomic characteristics in Los Angeles County as the AQMP and the GMP, would be considered adverse significant impacts. Application of EMFAC7EP series emissions factors to the 202.9 million VMT in Los Angeles County generated by the Countywide Travel Model under the above assumptions is shown on **Table 3.3.7** below.[4]

[4]Emission factors were calculated using the method and assumptions described in the SCAQMD Air Quality CEQA Handbook, April 1993.

TABLE 3.3.7 DAILY 2010 BASELINE AIR POLLUTANT MOBILE EMISSIONS IN LOS ANGELES COUNTY (tons)/a/

Pollutant	Tons
Carbon Monoxide	590
Reactive Organic Gas	38
Nitrogen Dioxide	87
PM10	36
Sulfur Dioxide	20

/a/ Emission factors were calculated using the method and assumptions described in the SCAQMD Air Quality CEQA Handbook, April, 1993.

The creation of air quality "hot spots" would also be considered an adverse impact.

IMPACTS

As discussed more fully in Chapters 1 and 2 of this EIR, the key change in the CMP contained in the 1993 CMP Update is the addition of the deficiency plan approach with its Tool Box menu of credits and debits that must be used by local jurisdictions to offset development-related impacts on the CMP transportation network. As explained in detail in Section 3.1 of this chapter, in order to analyze the potential impacts of the proposed deficiency plan approach, two scenarios were simulated using the Countywide Travel Model, a Trip Reduction Emphasis scenario and a Capacity Enhancement Emphasis scenario. In addition, the No-1993 CMP Update - Year 2010 Baseline Scenario was run for comparison purposes.

Direct Impacts - Results of the Countywide Travel Model runs indicate that both the proposed program would result in countywide emissions less than the AQMP 2010 baseline. The greatest improvement, an approximately 2.5 percent reduction in air pollutants, would be achieved by the Trip Reduction Emphasis. In contrast, the Tool Box choices favoring increased capacity through capital improvements would result in pollutant levels similar or slightly greater than the AQMP baseline emissions, an approximately 0.1 percent reduction as compared to baseline emissions. Based on these results, and given the range of mitigation choices provided local jurisdictions through the Tool Box, the proposed deficiency plan approach would provide **air quality benefits** as compared to baseline conditions. No significant adverse air quality impacts are anticipated on a countywide level. The range of effects are illustrated in **Table 3.3.8.** As can be seen from the table,

a systematic selection of capacity increasing measures by local jurisdictions could result in mobile carbon monoxide and nitrogen dioxide emissions somewhat greater than (2 percent) the 2010 baseline. These effects would be considered significant and adverse.

TABLE 3.3.8 COMPARISON OF 2010 EMISSIONS FOR LOS ANGELES COUNTY (Tons Per Day)

Pollutant	2010 Baseline	CMP Deficiency Plan Tool Box Range	
		Trip Reduction Emphasis	Capacity Emphasis
CO	590	584	597
ROG	38	38	38
NOX	87	86	88
PM10	36	36	36
SOX	20	20	20

SOURCE: Metropolitan Transportation Authority, Countywide CMP Travel Model with applicable EMFAC7EP series emission factors. VMT estimates for each scenario condition are as follows: AQMP 2010 Baseline - 202 million VMT; Demand Reduction - 201 million VMT; Capacity Increase - 205 million VMT.

It should be noted that the air quality analysis of the 1992 CMP acknowledged that while there would be regional air quality benefits there may be localized adverse affects including the affects of facility construction, realignment of facilities near sensitive land uses, and the creation of "hot spots" near transit centers/stations and/or park and ride lots. These highly localized adverse impacts of otherwise beneficial transportation improvements have become an important consideration in the South Coast Air Basin due to the requirements of the Clean Air Act Amendments of 1990 where federally funded projects cannot be sponsored if the number of violations and/or severity of air quality violations increases due to a transportation improvement.

To address this issue, the MTA has participated with SCAG and the SCAQMD along with other local agencies in developing a series of procedures and guidelines to address the "hot spot" issue on a project basis through a document called the Carbon Monoxide Transportation Project Protocol. This protocol requires that the air quality effects of proposed projects be fully evaluated and the adverse effects mitigated to be extent that there is no increase in the number of air quality violations or an increase in the severity of concentrations of existing violations.

Application of this protocol by local project sponsors to Tool Box measures will ensure conformity with the AQMP and no additional mitigation is required.

MITIGATION MEASURES

The following mitigation measure, as well as mitigation measures C.1 and C.4 from the 1992 CMP EIR will reduce the potential for direct air quality impacts resulting from the selection of capacity enhancement deficiency Tool Box measures.

3.3.1 MTA will develop its Tool Box in consultation with SCAG and the SCAQMD to ensure air quality goals are addressed.

3.4 ENERGY

This section of the EIR examines the 1993 CMP Update's potential to create significant impacts on energy use.

SETTING

According to the Draft EIR for the RMP, Los Angeles County consumed approximately 61 percent of all motor vehicle fuel in the six-county SCAG region. Development of the 1993 CMP, including the deficiency plan component and the associated Tool Box program, has involved extensive use of the Countywide Travel Model. In depicting conditions for 1990, the model results indicate that approximately 167.1 million vehicle miles were travelled Countywide, which suggests that approximately 9.3 million gallons of gasoline were consumed daily, as shown on **Table 3.4.1.** Existing commuter rail, rail transit, and bus fleets in the County also contribute to energy consumption.

TABLE 3.4.1 EXISTING (1990) DAILY ENERGY CONSUMPTION, LOS ANGELES COUNTY STREETS AND HIGHWAYS

Facility Type	Vehicle Miles (millions)	Fuel Consumption (millions of gal)
Freeway	81.9	4.6
Arterial	72.2	4.0
HOV and Other	13.0	0.7
TOTAL	**167.1**	**9.3**

SOURCE: MTA, CMP Countywide Travel Model, 1990 Base Year Run Results. Fuel consumption in gallons per vehicle mile based on SCAQMD CEQA Manual, Table A9-5-0. A fuel consumption rate of 0.056 gallons per vehicle mile is assumed (approximately 17.9 mpg).

THRESHOLDS OF SIGNIFICANCE

The CEQA Statutes and Guidelines indicate that a significant energy impact is one that would either greatly increase energy consumption or one that would require the identification of new energy sources.

IMPACTS

As discussed more fully in Chapters 1 and 2 of this EIR, the key change in the CMP contained in the 1993 CMP Update is the addition of the deficiency plan approach with its Tool Box menu of credits and debits that must be used by local jurisdictions to offset development-related impacts on the CMP transportation network. As explained in detail in Section 3.1 of this chapter, in order to analyze the potential impacts of the proposed deficiency plan approach, two scenarios were simulated using the Countywide Travel Model, a Trip Reduction Emphasis scenario and a Capacity Enhancement scenario. In addition, the No-1993 CMP Update - Year 2010 Baseline Scenario was run for comparison purposes.

Direct Impact - These scenarios and the corresponding fuel consumption are shown on **Table 3.4.2.** As shown in **Table 3.4.2**, the Trip Reduction Emphasis scenario would result in reduced consumption of approximately 100,000 gallons per day when compared to 2010 baseline conditions. When compared to 2010 Baseline Conditions, the Capacity Enhancement Emphasis scenario would not result in a gasoline consumption reduction, and would result in a 1 percent increase in fuel use compared to the 2010 baseline (approximately 100,000 gallons). Given the flexibility provided local jurisdictions in their choice of Tool Box

measures, the proposed deficiency plan approach would have a **beneficial impact** on energy use on a Countywide basis.

TABLE 3.4.2 COMPARISON OF DAILY ENERGY CONSUMPTION, LOS ANGELES COUNTY STREETS AND HIGHWAYS

Scenario	Vehicle Miles (millions)	Fuel Consumption (millions of gallons)
2010 Baseline	202.9	7.7
2010 With Demand Reduction Emphasis	201.0	7.6
2010 With Capacity Enhancing Emphasis	205.2	7.8

SOURCE: Metropolitan Transportation Authority, CMP Countywide Travel Model, 2010 Results. Fuel consumption in gallons per vehicle mile based on SCAQMD CEQA Manual, Table A9-5-0. A 0.038 gallons per vehicle mile (26.3 mpg) is assumed.

It should be recognized, however, that as local jurisdictions place more emphasis on TDM-intensive measures, the energy consumption characteristics of alternate travel modes will become a more significant part of the energy consumption equation. Specifically, emphasis on transit would increase consumption of fossil fuels for electric power generation for rail transit and commuter rail, as well as for electric buses and cars. In the short-term, an emphasis on transit would also increase diesel fuel consumption by existing bus fleets serving the County. Overall, it should be emphasized that a shift toward high vehicle occupancy modes would increase energy efficiency in the County by decreasing energy consumption per person trip. This would be a **beneficial impact**.

It is possible that there would be increases in fuel consumption in and around transit stations or park and ride lots due to increased traffic delays and reduced traffic speeds at these centers. The increase in fuel consumption is not anticipated to have a material affect on the overall beneficial aspects of the proposed project. Specifically, if it is assumed that fuel consumption per vehicle mile is twice as high within these center areas as it is countywide (0.076 gallons per vehicle miles versus 0.038 gallons per vehicle mile), it is unlikely that more than 1.2 to 1.5 million total vehicle miles would take place within one-half mile of approximately 50-75 potential centers throughout the County. This amount of vehicle miles traveled would be less than 1 percent of the total vehicle miles of travel and it would not increase the estimated vehicle fuel consumption factor of 0.038 gallons per vehicle

mile when the center areas are taken into account. As a result, the potential increase in energy consumption would **not be significant**.

The construction of capital projects would result in a short-term consumption of energy. However, the amount would be typical of capital construction projects and is thus not anticipated to result in a need for new energy sources or large amounts of energy. Construction energy use would be greater under the capacity enhancement than the trip reduction scenario. However, under both scenarios, the short-term consumption of energy for construction purposes would be a **non-significant impact** of the proposed project.

MITIGATION MEASURES

None required.

3.5 LAND USE

This section of the EIR examines the potential of the 1993 CMP Update to systematically alter land use in a way which would result in a distribution of land uses, which is: (1) significantly different than the GMP policy future; or (2) constitutes a systematic alteration in the markets for office, industrial, and residential uses.

SETTING

Land use within the 4,060 square miles of Los Angeles County is characterized by the density and distribution of housing and employment. The generalized distribution of these factors is shown in **Table 3.5.1 and 3.5.2.**

Figures 3.5.1 through 3.5.4 illustrate the generalized distribution of housing units and non-residential space (office, retail, and industrial) in the 4,060-square mile area of Los Angeles County. Future land use decisions are guided by the general and specific plans of each jurisdiction within Los Angeles County. At the regional level, the SCAQMD and the SCAG have developed regional goals and objectives for the distribution of population, housing, and employment growth in conjunction with local jurisdictions, particularly through the AQMP, in order that air quality improvements can be achieved. These desired patterns are included within the adopted GMP for the region.

TABLE 3.5.1 HOUSING GROWTH TREND COMPARED TO GMP GOALS

	1984	Market Trend 2010	GMP Goal 2010	Goal - Trend 2010
San Fernando Valley	454,000	633,700	643,000	9,300
Glendale/Pasadena	442,500	544,300	537,100	-7,200
East San Gabriel Valley	233,000	364,400	355,100	-9,300
Santa Monica Bay	519,200	641,200	666,100	24,900
Central Los Angeles	777,100	878,300	898,100	19,800
Long Beach/Downey	400,000	491,200	503,500	12,300
Santa Clarita Valley	29,200	94,300	89,800	-4,500
Santa Monica Mountains	21,300	44,400	42,900	-1,500
Angeles Forest	1,100	1,100	1,100	0
Imperial County	33,400	49,200	51,900	2,700
Los Angeles County	2,923,600	3,928,500	3,959,300	30,800
Orange County	760,100	1,138,600	1,191,900	53,300
Riverside County	326,000	845,000	809,300	-35,700
San Bernardino County	408,600	1,014,200	972,900	-41,300
Ventura County	196,600	342,200	332,200	-10,000
Region	**4,648,300**	**7,317,500**	**7,317,500**	**0**

SOURCE: SCAG, Regional Mobility Plan, Technical Appendix, 1989.

TABLE 3.5.2 EMPLOYMENT GROWTH TREND COMPARED TO GMP GOALS

	1984	Market Trend 2010	GMP Goal 2010	Goal - Trend 2010
San Fernando Valley	580,900	851,100	809,800	-41,300
Glendale/Pasadena	485,400	616,800	616,200	-600
East San Gabriel Valley	239,300	389,800	391,600	1,800
Santa Monica Bay	759,500	1,058,100	1,012,500	-45,600
Central Los Angeles	1,435,300	1,677,200	1,639,500	-37,700
Long Beach/Downey	482,600	659,300	632,200	-27,100
Santa Clarita Valley	23,400	113,400	107,200	-6,200
Santa Monica Mountains	13,200	26,700	31,800	5,100
Angeles Forest	600	600	600	0
Imperial County	37,000	70,800	65,600	-5,200
Los Angeles County	4,053,000	5,519,400	5,415,200	-104,200
Orange County	1,048,000	1,807,100	1,691,800	-115,300
Riverside County	247,000	514,700	626,500	111,800
San Bernardino County	325,000	687,800	789,400	101,600
Ventura County	213,000	363,000	365,600	2,600
Region	**5,923,000**	**8,962,800**	**8,954,100**	**-8,700**

SOURCE: SCAG, Regional Mobility Plan, Technical Appendix, 1989.

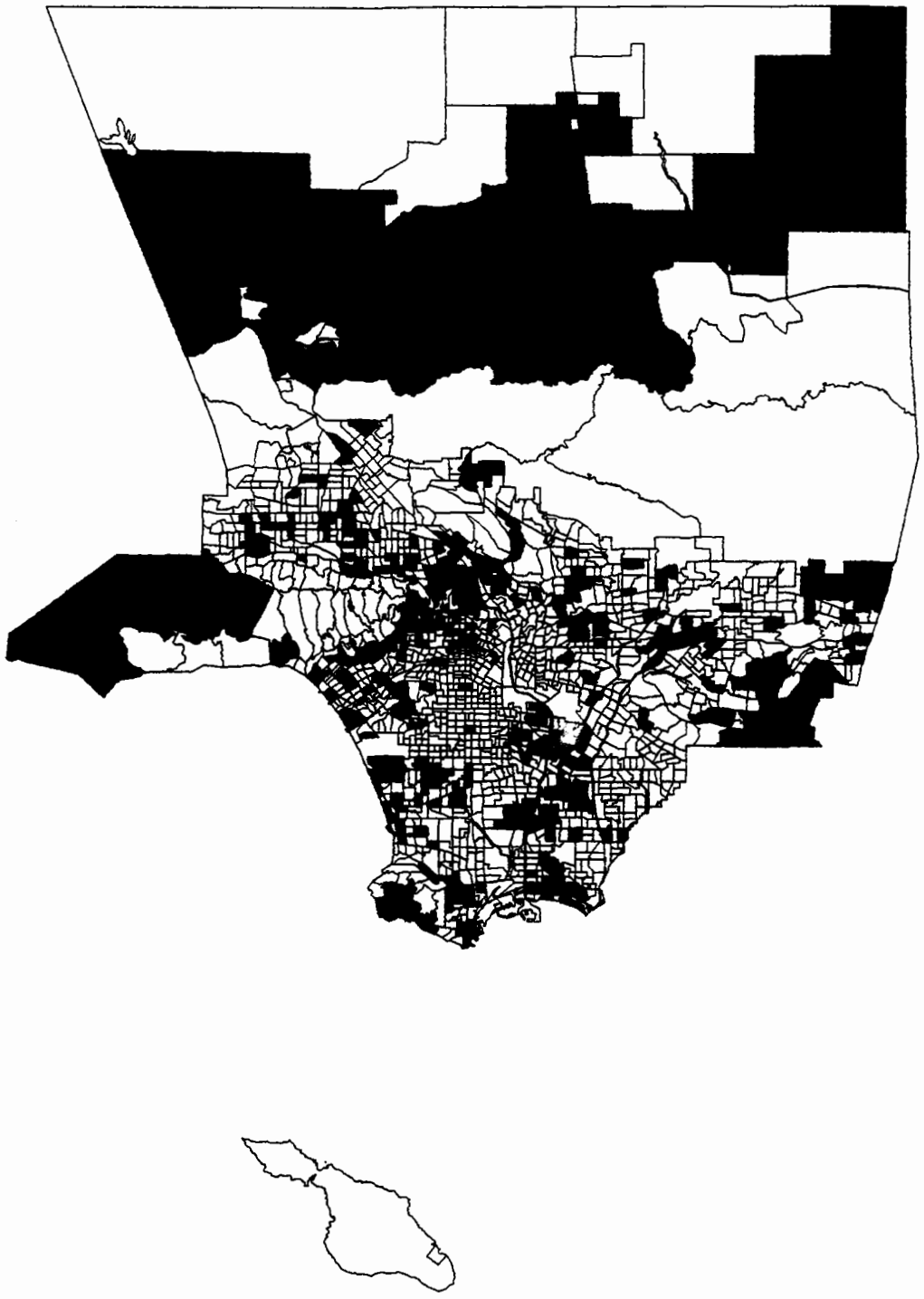


FIGURE 3.5.1
HOUSING CENSUS TRACTS
WITH MORE THAN 2,500 DWELLING UNITS

SOURCE: 1990 Census STF3A

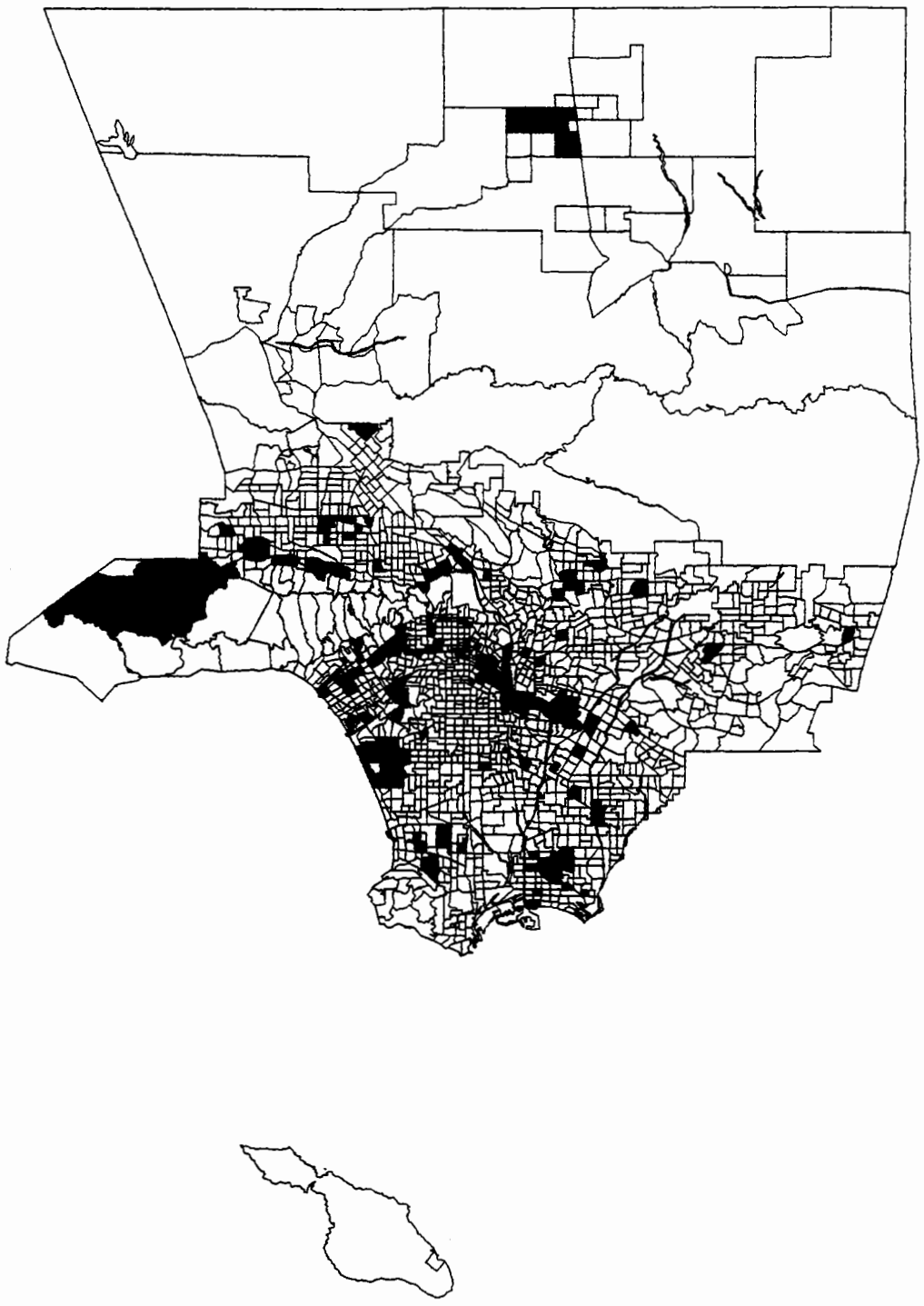


FIGURE 3.5.2
OFFICE SPACE CENSUS TRACTS
WITH MORE THAN 500,000 S.F.

SOURCE: Terry A. Hayes Associates

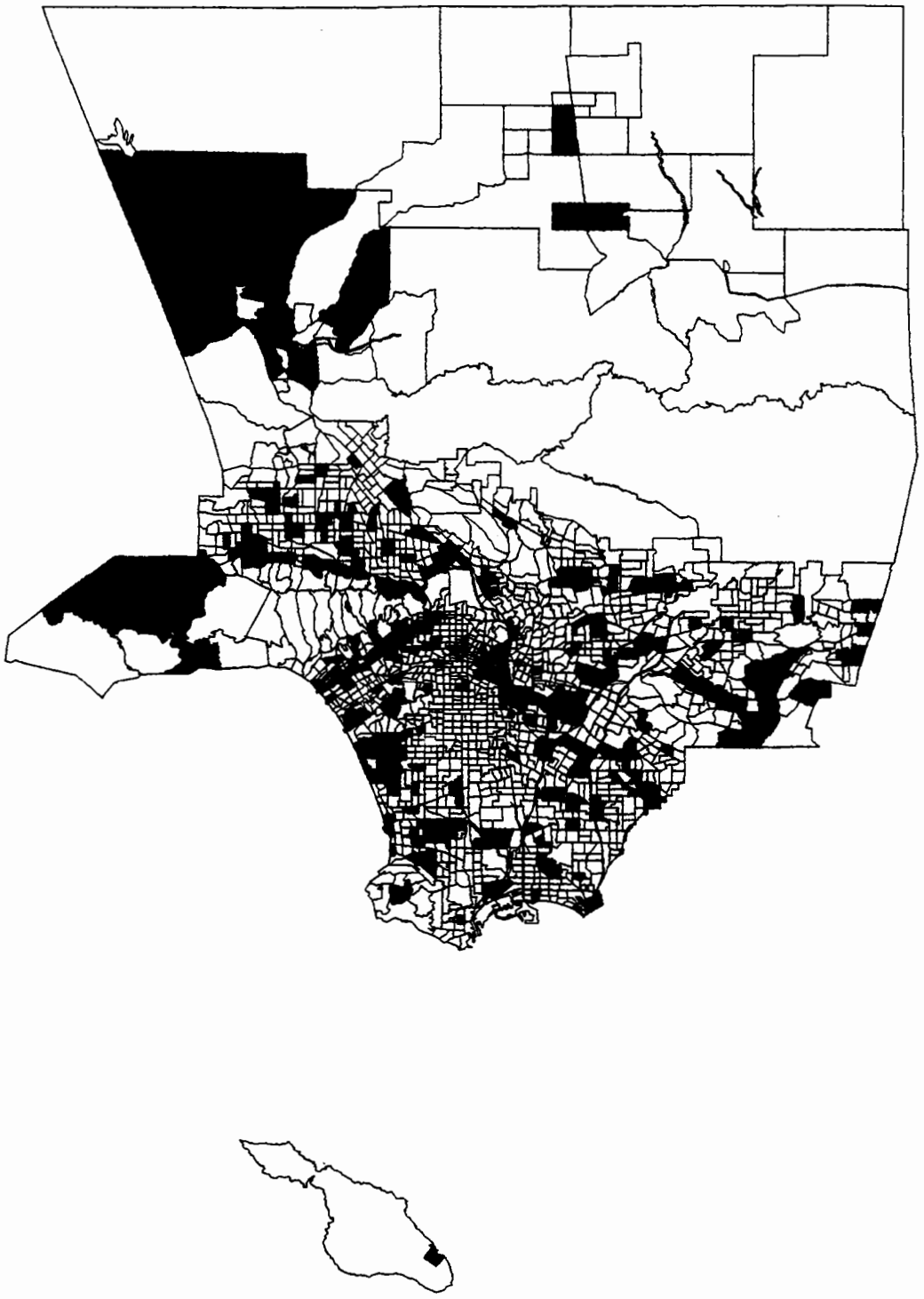


FIGURE 3.5.3
RETAIL SPACE CENSUS TRACTS
WITH MORE THAN 500,000 S.F.

SOURCE: Terry A. Hayes Associates

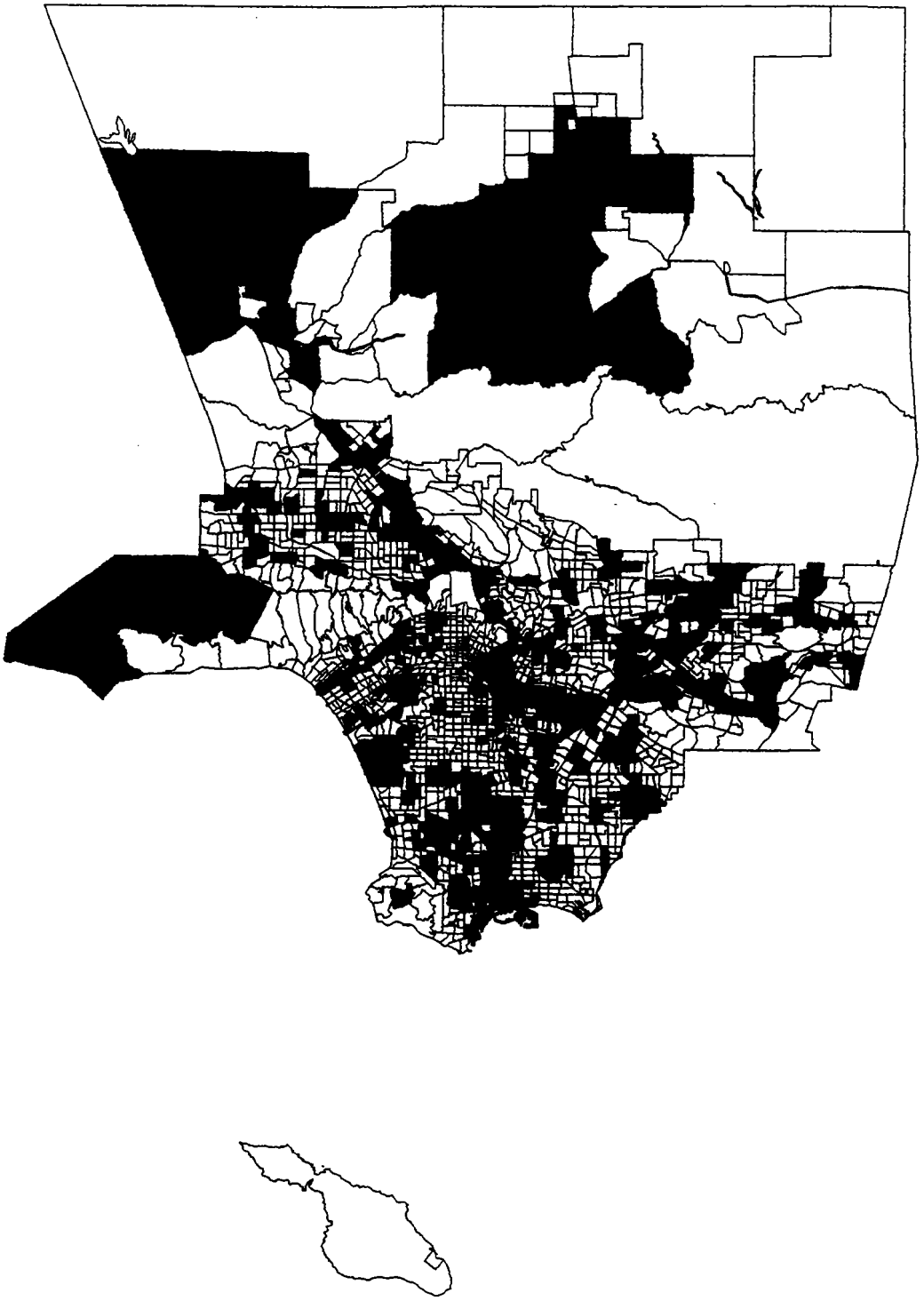


FIGURE 3.5.4
INDUSTRIAL SPACE CENSUS TRACTS
WITH MORE THAN 500,000 S.F.

SOURCE: Terry A. Hayes Associates

The forecast year for the GMP is 2010. As a desired policy outcome, the GMP differs from a straight line extrapolation of existing trends into the future. The analysis conducted by SCAG for the GMP indicated the following:

- Under existing trends, Los Angeles County would capture 37.6 percent of the housing growth, and 48.2 percent of the employment growth in the region. Under the GMP, the County would capture 38.8 percent, and 44.9 percent of the regional housing and employment growth, respectively, as shown on **Tables 3.5.1 and 3.5.2**.

- Within Los Angeles County, nine geographic subareas were defined for analysis. These subareas are shown on **Figure 2.3**. Under existing trends, the distribution of housing growth would favor the East San Gabriel Valley and Santa Monica Bay and, to a lesser extent, Glendale/Pasadena and Central Los Angeles. The GMP attempts to focus housing growth on Santa Monica Bay and Central Los Angeles. Employment growth trends favor Santa Monica Bay, the San Fernando Valley, and Central Los Angeles. Under the GMP, the distribution of growth would be channeled away from Santa Monica Bay and Central Los Angeles and encouraged in the East San Gabriel Valley and the Santa Monica Mountains, as shown on **Table 3.5.2.** Within the region, housing would be channeled into Los Angeles County and employment would be channeled out of the County into other portions of the SCAG region.

It should also be recognized that, as yet, the GMP does not provide specific requirements and regulations to achieve the desired land use distribution patterns. Discretionary approvals regarding the character and intensity of growth are a function of local decision making. Growth pressures at the local level are a function of market conditions, local land use policies, and growth objectives. Thus,there currently exists no method by which the goals and objectives contained within the GMP may be confidently achieved.

Within Los Angeles County there are established and emerging markets for office, retail, and industrial space and for single- and multi-family housing. For example, the strongest office space markets are in West Los Angeles-Century City, Downtown Los Angeles, Glendale-Burbank, and the South Bay. Industrial markets are strong in the South Bay and along the I-10/SR60 corridor in the eastern portion of the County. Single-family home markets are strong in the areas at the urban fringe, such as north San Fernando Valley, eastern San Gabriel Valley, and the Antelope Valley.

THRESHOLDS OF SIGNIFICANCE

The basic focus of the CMP provisions will be at the jurisdictional level. It will be local jurisdictions, that, in order to meet the requirements of the deficiency plan program, will need to select Tool Box measures to offset the effects of residential and non-residential growth. The assessment presented herein will provide a methodology to test whether the combined effect of these local decisions will:

- Systematically result in land use patterns substantially different than those anticipated in the GMP.

- Systematically alter land use development patterns associated with the office, industrial, retail, and residential markets.

Either of these types of alterations in land use would be significant.

IMPACTS

It should be emphasized that it is not possible to actually predict how decision makers in a given jurisdiction will respond to the program requirements and which Tool Box measures will be selected. However, for the purposes of this assessment, several possible local response scenarios have been identified; these response scenarios will be evaluated to determine the propensity to significantly shift land use patterns.

The potential areas of local response will entail how Tool Box mitigation measures would be funded and whether capacity enhancing or demand reducing Tool Box measures are selected. Possible funding scenarios are as follows: use of local revenue; imposition of transportation costs; use of development charges or fees; and use of land use incentives. The land use implication of each of these measures is described below. The choice of Tool Box measures are discussed under each of these funding scenarios only when a local jurisdiction's choice of Tool Box measures at the capacity enhancing or demand reduction end of the program implementation bracket would affect the degree of land use impact.

Use Local Revenue Scenario

A jurisdiction could elect to pay for required mitigation measures through various local funding sources (i.e., General Funds, Local Return Sales Tax, State Gas Tax return, Redevelopment Funds, etc.). Jurisdictions exercising this option would tend to be fiscally sound, having revenues exceeding expenditures in their current budgets. Data on local jurisdictions' 1992 budgets suggest that about 35 percent

of the jurisdictions in Los Angeles County had revenues that exceeded expenditures. Moreover, 28 percent of the jurisdictions were operating with an unfavorable expenditure to revenue ratio during this time period. Fiscally sound jurisdictions could pursue this option with the recognition that increased retail sales and other taxes generated by new development would offset the potential costs of mitigation measures.

Land Use Effect - No direct land use effects would result from this approach. Indirectly, however, a consistent use of General Fund revenues could reduce some other function or service within the jurisdiction. Should this reduction become a significant local issue, it is possible that local pressure could be applied to curtail or slow the rate of development and indirectly affect land use. This outcome is unlikely, however, because new development would generate revenue, new sources for the City that could be used to maintain existing functions and service levels in the jurisdiction, although the actual costs associated with implementing Tool Box mitigation measures could be either greater or less than projected revenues associated with a particular project. Overall, the use of local revenues would not result in significant impacts.

Impose Direct Transportation Costs Scenario

Some Tool Box mitigation measures, particularly TDM-intensive measures, could be funded by imposing direct costs such as, parking fees on drivers.

Land Use Effect - A cost or fee directly imposed by a local jurisdiction on a transportation mode choice, such as auto travel or parking, as well as incentives offered for transit use, such as pass subsidies and free shuttle service, will likely affect travel behavior but have no direct or indirect effect on land use.

Use of Development Charges or Fees

To pay for required mitigation measures, a local jurisdiction may seek exactions from developers. The amount of these exactions could vary significantly depending on the degree to which local jurisdictions pursue capital-intensive projects, rather than TDM-intensive projects. The added costs would likely be passed on to tenants or consumers in the form of higher leases, reduced free rent on long-term leases, or higher product prices.

Land Use Effect - In theory, the imposition of exactions in the form of development fees runs the risk of discouraging development if the fees cannot be passed on and readily absorbed. As a practical matter, the jurisdictions most likely to impose exactions would be those in which a significant amount of development

is taking place, which is indicative of strong market support. Under strong market conditions, costs can be passed on to tenants and consumers in the form of higher leases or product prices and no change in land use development patterns would be apparent. In weak or marginal market conditions, exactions would likely slow development or cause a geographic shift in the development pattern. It should be recognized, however, that under weak market conditions there would be a weaker demand for development and a corresponding lessening of the need to provide CMP-based mitigation measures. Thus, the land use shifts would be small or minor in nature.

In theory, it is possible that the imposition of exactions would increase the potential for development to shift to areas where there would be no exactions or other added development costs. The potential for a jurisdiction to capture the development from another jurisdiction is limited, particularly when it is recognized that the CMP and its deficiency plan requirements are a countywide program affecting all jurisdictions. In order for a jurisdiction to capture new growth, it would also require a means of funding Tool Box measures to mitigate the effect of the new growth.

Jurisdictions in strong, established markets where future growth is generally forecasted are less likely to lose their share of development even though the cost of development may increase directly or indirectly. Jurisdictions in weak, untested markets will have less of an incentive to practice "fiscal zoning" or seek other methods of capturing growth from established areas because of the mitigation cost associated with the CMP program. New development is unlikely to be channeled into weaker markets, but could be channeled into market areas slightly weaker than the preferred market areas. The likelihood that new development will be channeled into weaker market areas by exactions is offset by the reduction in likely profit margin and may be completely eliminated or channeled into other regions in the absence of available local markets. Growth could hypothetically be captured and shifted from an established to an unestablished market if the city capturing the growth had amassed a large amount of mitigation credits. This would be an unlikely occurrence, however, because large amounts of mitigation credits may only be possible when capital improvements are selected, in transit corridors, or around transit stations. These types of improvements are typically designed to serve either existing development or strong market areas. Thus, the possibility of a less developed jurisdiction capturing growth in this way would be minimal.

The CMP appears not to significantly alter existing growth patterns and is consistent with established land development markets.

Land Use Incentives For Development To Occur In Transit-Type Corridors

Local jurisdictions may elect to provide mitigation by creating development incentives in the vicinity of transit stations or transportation terminals. Incentives would likely entail measures having a monetary value to developers such as reduced parking requirements, increased density bonuses, and expedited project processing and approval time.

Land Use Effect - As discussed above, it is anticipated that the overall effect of the CMP program on land use would not significantly alter current market trends and that too little incentive for growth to shift to untraditional growth areas would be provided. Under these circumstances, the creation of land use development incentives in transit corridors and/or transit station areas would induce the redistribution of development within a jurisdiction rather than capturing growth from other jurisdictions. This localized redistribution of development would result in greater densification of transit corridors and/or station areas. This type of change would be consistent with the objectives of the GMP and it would not likely have a significant effect on market-based land use patterns. Due to assumed reduction in trips and trip length within these areas, the overall affect would be **beneficial.**

Cumulative Effects

A final aspect of local Tool Box choices is the potential cumulative effect on land use. Of particular concern are local jurisdictions that may overwhelmingly select TDM-intensive measures or make choices that tend to favor capital intensive measures. In this situation, the management and incentive nature of TDM-intensive measures is focused on travel behavior and, as a result, the effect on land use would be indirect. If capital improvements were concentrated in undeveloped portions of the County, it could be argued that these improvements would induce growth in less developed areas by providing the necessary transportation infrastructure. However, the type of capital improvements that are likely to be considered are not geographically concentrated and in most cases are gap closure or retrofit projects on existing facilities that would not extend the County transportation system into less developed areas. As a result, a TDM focus or capital improvement focus would not appear to systematically affect land use development patterns in the County. **No significant land use impact** is anticipated.

As can be seen from the above discussion, the range of funding or mitigation responses that may be taken by local jurisdictions, whether it be use of local revenue sources, direct charges, or land use incentives for funding, or selection

of capacity enhancing or demand reduction enhancing mitigations, is not anticipated to result in significant adverse impacts.

MITIGATION MEASURES

The discussion presented above indicates that the 1993 CMP Update would not have a significant impact on land use patterns within the County under any of the local response scenarios discussed above. Furthermore, it is anticipated that local responses would have no adverse effects on achieving the objectives of the AQMP and its underlying GMP. As noted above, however, there are no overriding regulations that require local jurisdictions to approve land use developments in a manner consistent with the AQMP and GMP. In the absence of such regulations, the CMP, by requiring annual reporting of development growth in local jurisdictions, can monitor growth trends and roughly establish the correlation between Tool Box measures that are being selected by local jurisdictions and the resulting land use development consequences.

3.5.1 In order to ensure that the CMP is contributing to achieving the objectives of the GMP, the MTA shall evaluate the growth patterns and determine whether CMP Tool Box choices have a significant correlation to the changes in land use patterns in the County, if any, after the Deficiency Plan program has been in place for 5 years.

3.6 PUBLIC SERVICES

This section of the EIR is intended to address two major kinds of questions regarding the 1993 CMP Update's potential to impact public services: (1) will compliance with the administrative implementation aspects of the 1993 CMP Update result in a diversion of local jurisdictional resources away from the provision of other services to a degree which significantly impacts the provision of public services; and (2) will compliance with the CMP divert fiscal resources away from the provision of other services to a degree that significantly impacts the provision of public services? These are the two areas of public service related concern expressed by local jurisdictions during the development of the deficiency plan approach.

Potential impacts on specific public services associated with the GMP were discussed in the EIR for that plan.[5] The RMP was developed to be consistent with

[5]Draft Environmental Impact Report On The Southern California Association of Government's Draft Growth Management Plan. October 1988. State Clearing

the GMP. The CMP is designed to be consistent with the RMP and the deficiency plan model runs are based on the land use future analyzed in the GMP EIR. The focus of this public service impact assessment was established, based on the prior analysis of impacts on specific public services contained in the EIR for the GMP, the CMP's relationship to the RMP and GMP, the programmatic nature of the 1993 CMP Update, and the nature of the public service concerns expressed by local jurisdictions.

SETTING

Existing Related Local Jurisdiction Administrative Requirements

In order to understand the 1993 CMP's potential to create the two kinds of public service impacts under analysis, it is important to be familiar with the existing administrative requirements of related programs, and the availability of formula allocated public funds which can be used for CMP deficiency mitigation. These two things affect the degree of additional administrative and fiscal burden created by the 1993 CMP Update and thus a judgement about whether the additional administrative burden and potential "costs" of deficiency plan compliance are significant.

The Adopted CMP

The MTA adopted a first year CMP which provided local jurisdictions with flexibility in meeting their CMP responsibilities and which stressed the benefits of coordinating a mix of transportation solutions, transportation and land use programs, and cooperation with neighboring jurisdictions. Under the adopted CMP, each local jurisdiction is responsible for:

- Monitoring the attainment of LOS standards and the collection of traffic data for CMP routes on an annual basis.
- Adopting and implementing a TDM ordinance by April 1, 1993.
- Municipal transit operators submitting data for CMP transit monitoring.
- Adopting and implementing a program to analyze the impacts of land use decisions. Local jurisdictions were required to adopt their CMP land use analysis program by April 1, 1993.

House Number 88062924.

Transportation Control Measures (TCM) Reporting

The South Coast Air Basin presently 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 federal Clean Air Act requires the South Coast Basin to attain the federal primary ambient air quality standards for ozone by 2010, the standard for particulate matter by 2001 and the standards for carbon monoxide and nitrogen dioxide by 2000. The CCAA requires all nonattainment air basins in the state to develop new attainment plans to meet federal and state air quality standards and to reduce unhealthful pollutant levels by 25 percent in 1994, 40 percent in 1997, and 50 percent in 2000. If the Basin does not meet the federal requirements, it may lose substantial federal funds for infrastructure.

The AQMP adopted by the SCAQMD and SCAG is structured to bring the Basin into compliance with or to exceed the state and National Air Quality Standards.[6] The CCAA requires severe nonattainment areas to achieve an average of 1.5 or more persons per vehicle during commute hours by 1999. On a regional basis, this substantially exceeds the scope of SCAQMD's Regulation XV which sets the same goal but applies only to businesses with 100 or more employees. To close this gap, the 1991 AQMP contains a number of strategies, including person work trip reduction, non-motorized transportation, employer rideshare and transit incentives, parking management, High Occupancy Vehicle (HOV) facilities, transit improvements, enhanced Regulation XV, trip reduction for schools, and special activity center trip reduction.[7]

Under the AQMP, local governments are responsible for reducing emissions by energy conservation, dust control, and trip reduction. They are required to implement new regulatory ordinances, administer changes to the project review process, and assist with enforcement and data collection for monitoring effectiveness. The AQMD encourages local governments to implement TCMs at the local level and encourages local governments to take actions that will address both the AQMP and the CMP.

Local jurisdictions are currently required to report on actions taken to further implementation of TCMs listed in the 1979 State Implementation Plan (SIP), the 1989 AQMP, and the 1991 AQMP, and the 1992 CO Plan. The TCM measures that local jurisdictions are required to report on are listed in **Table 3.6.1**.

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[6]Final 1991 AQMP, July 1991. SCAQMD.

[7]For additional information, please see page 6-6 of the 1991 AQMP.

TABLE 3.6.1 TRANSPORTATION CONTROL MEASURES (TCMs)

MEASURE NO.	TITLE	CONTAINED IN
H-4.	Modified Work Schedule	The 1979 State Improvement Program (SIP)
H-5.	Carpool Preferential Parking	The 1979 State Improvement Program (SIP)
H-23.	Increased Bicycle/Pedestrian Facilities	The 1979 State Improvement Program (SIP)
H-34.	Employees Ridesharing Program	The 1979 State Improvement Program (SIP)
H-35.	Traffic Signal Synchronization	The 1979 State Improvement Program (SIP)
H-118.	Reduce Non-recurrent Congestion	The 1979 State Improvement Program (SIP)
1.a.	Alternative Work Weeks and Flextime	The 1989 AQMP
1.b.	Telecommunications	The 1989 AQMP
2.a.	Employer Rideshare and Transit Incentives	The 1989 AQMP
2.b.	Parking Management	The 1989 AQMP
2.d.	Merchant Transportation Incentives	The 1989 AQMP
2.e.	Auto Use Restrictions	The 1989 AQMP
2.g.	Transit Improvement	The 1989 AQMP
3.a.	Truck Dispatching, Rescheduling, and Rerouting	The 1989 AQMP
4.	Traffic Flow Improvements	The 1989 AQMP
5.	Non-recurrent Congestion	The 1989 AQMP
6.	Aircraft and Ground Service Vehicles	The 1989 AQMP
7.	Centralized Ground Power Systems	The 1989 AQMP
8.	Airport Ground Access	The 1989 AQMP
11.	Rail Consolidation to Reduce Grade Crossings	The 1989 AQMP
12.a.	Paved Roads	The 1989 AQMP
17.	Growth Management	The 1989 AQMP
1.a.	Alternative Work Weeks	The 1991 AQMP
1.b.	Non-motorized Transportation	The 1991 AQMP
2.a.	Employer Rideshare and Transit Incentives	The 1991 AQMP
2.b.	Parking Management	The 1991 AQMP
2.d.	Merchant Transportation Incentives	The 1991 AQMP
2.e.	Auto Use Restriction	The 1991 AQMP

TABLE 3.6.1 TRANSPORTATION CONTROL MEASURES (TCMs)

MEASURE NO.	TITLE	CONTAINED IN
2.f.	HOV Facilities	The 1991 AQMP
2.g.	Transit Improvements	The 1991 AQMP
3.a.	Truck Dispatching, Rescheduling and Rerouting	The 1991 AQMP
4.	Traffic Flow Improvements	The 1991 AQMP
5.	Non-recurrent Congestion	The 1991 AQMP
9.	Replacement of High-Emitting Aircraft	The 1991 AQMP
11.	Rail Consolidation to Reduce Grade Crossings	The 1991 AQMP
12.a.	Paved Roads	The 1991 AQMP
17.	Growth Management	The 1991 AQMP
FC-1	Transit Improvements (2.g. Transit Improvements)	The 1992 CO Plan
FC-2	Restrictions of Certain Roads/Lanes for Use by Buses or HOVs (2.f. HOV Facilities)	The 1992 CO Plan
FC-4	Additional VMT/VT Reduction Strategies (1.a. Alternative Work Weeks) (1.b. Non-motorized Transportation) (2.a. Employer Rideshare and Transit Incentives) (2.b. Parking Management) (2.d. Merchant Transportation Incentives) (2.e. Auto Use Restrictions) (17. Growth Management)	The 1992 CO Plan
FC-5	Traffic Flow Improvements (4. Traffic Flow Improvements) (5. Non-recurrent Congestion)	The 1992 CO Plan

SOURCE: MTA

TCM progress reporting is required to enable completion of two reports, the Expeditious Implementation Report for the Amendment to the Fiscal Year (FY) 1993-1999 RTIP which is required by SCAG and is transmitted to the U.S. Environmental Protection Agency and the Federal Highways Administration, and the California Air Resources Board (CARB) Report prepared by the SCAQMD for transmittal to CARB. Local jurisdictions must prepare a report detailing, for each TCM, proposed local actions to implement the TCM, the AQMP target date, the local VT/emission reduction target date, the jurisdiction's status and schedule with regard to implementation, and the jurisdiction's implementation actions to-date.

Fiscal Resources For Transportation Projects

Local jurisdictions currently have access to an array of federal, state, and local funding sources for transportation purposes. While the older sources of funding, such as Motor Vehicle License Fees, are limited to street and highway use, the newer state and federal sources generally allow more flexible uses and include alternative transportation, transportation control measures, and demand management. As shown in **Tables 3.6.2 and 3.6.3**, the following funding sources can be used by cities and the County, respectively, to fund projects for which local jurisdictions can receive CMP deficiency plan mitigation credit:

Los Angeles County Sales Tax Funds - Funds from Propositions A and C, which each represent a 1/2 cent increment on the county sales tax, have a mandatory set aside for return to local jurisdictions. This local set aside may be used for CMP deficiency plan mitigation projects. The funds are apportioned to local jurisdictions according to their percentage of population in the county as a whole. Local jurisdictions have discretion for allocation of these monies provided they are within the broad transit and TDM guidelines of the Propositions. They can also be used for certain street improvements that will facilitate transit use, i.e., concrete bus pads on streets with heavy transit use. While the amounts generated by these Propositions vary somewhat with the economy, together, they generate about $700 million annually, countywide, with approximately $140 to $175 million returned to the county and the cities.

Motor Vehicle License Fee Funds - 81.75 percent of the funds generated from state Motor Vehicle License Fees are allocated 50 percent to cities and 50 percent to counties. The allocation to each city is based on the proportion of its population to the total population of all cities. The allocation to counties is based on the proportion of its population to the total population of all counties. The apportion amounts are estimated at $34.65 per capita for cities and $28.22 per capita for counties. These Motor Vehicle License Fee funds can be used for general street and highway purposes.

TABLE 3.6.2 SOURCES OF FORMULA ALLOCATED PUBLIC FUNDS FOR CITIES FOR CMP MITIGATION

SOURCE	ORIGIN OF FUNDS	APPLICABLE USES	BASIS FOR APPORTIONMENT	AMOUNT AVAILABLE	OTHER COMMENTS
Proposition A	½% of Sales Tax	Transit, TDM, Rail	% of population to cities in county.	n/a	Local return portion available for CMP mitigation.
Proposition C	½% of Sales Tax	Transit, TDM, Rail	% of population to cities in county.	n/a	Local return portion available for CMP mitigation.
Section 2105 Highway Users Taxes	Prop. 111 Gas Tax	Streets and roads, Commuter Rail	% of population to cities in state.	$4.84 per capita	Must continue previous levels of spending for street and highway purposes. Compliance with CMP required as a condition of funding.
Section 2106 Highway Users Taxes	Gas Taxes	Street and highway construction and maintenance. Resurfacing signals.	% of population to cities in county.	Approx. $4.00 per capita except for very small cities.	Not eligible for transit uses.
Section 2107 Highway Users Taxes	Gas Taxes	Street and highway construction and maintenance. Resurfacing signals.	% of population to cities in state.	$8.15 per capita	Not eligible for transit uses.
Section 2107.5 Highway Users Taxes	Gas Taxes	Engineering costs and administrative expenses.	Set amounts per population bracket.	Set amounts	Minimum $1,000; maximum $20,000.
Motor Vehicle License Fees	License Fees Sec. 11005(a) Revenue and Tax Code	Street and highway construction and maintenance. Resurfacing signals.	50% of 81.25% of the balance.	$34.65 per capita	None.
Motor Vehicle License Fees	License Fees Sec. 11005(b) Revenue and Tax Code	Street and highway construction and maintenance. Resurfacing signals.	18.75% of the balance to lower or no property tax. Based on population of all cities and to counties.	n/a	Statewide total approximately $4.7 million. 20 cities in county receive amounts ranging from $34,348 (Rolling Hills Estates) to $426,473 (Norwalk).

TABLE 3.6.2 SOURCES OF FORMULA ALLOCATED PUBLIC FUNDS FOR CITIES FOR CMP MITIGATION

SOURCE	ORIGIN OF FUNDS	APPLICABLE USES	BASIS FOR APPORTIONMENT	AMOUNT AVAILABLE	OTHER COMMENTS
Surface Transportation Funds (STP)	ISTEA/SB 1435	Arterial improvements or construction operational improvements, capital for transit projects, safety improvements, planning, traffic management, fringe and corridor parking, bikeways, Transportation Control Measures per AQMP.	110% of funding levels from 1976 Federal Act. Programmed by MTA and SCAG.	n/a	Required 11.47% local match, construction in 2 years, inclusion in RTIP and land use. Compliance with CMP. Non-discretionary portion available for CMP mitigation.
AB 2766	Additional Motor Vehicle Registration Fee	Implementation of AQMP and CCAA relating to mobile sources of emissions.	40% total distributed to cities and counties.	$9.3 million statewide	Can be used for TDM strategies.

SOURCE: Marcia Mednick & Associates

TABLE 3.6.3 SOURCES OF FORMULA ALLOCATION FUNDS FOR LOS ANGELES COUNTY FOR CMP MIGITATION

SOURCE	ORIGIN OF FUNDS	APPLICABLE USES	BASIS FOR APPORTIONMENT	AMOUNT AVAILABLE	OTHER COMMENTS
Proposition A	½% of Sales Tax	Transit, TDM	Population	n/a	Local return portion available for CMP mitigation.
Proposition C	½% of Sales Tax	Transit, TDM	Population	n/a	Local return portion available for CMP mitigation.
Section 2104 Highway Users Taxes	Gas Taxes	Streets and highway construction and maintenance.	Formula based on vehicle registration and maintained mileage.	n/a	None.
Section 2105 Highway Users Taxes	Prop. 111 Gas Tax	Streets and highway construction and maintenance. Commuter Rail	Formula based on vehicle registration and maintained mileage.	n/a	Compliance with CMP required as a condition of funding.
Section 2106 Highway Users Taxes	Gas Taxes	Streets and highway construction and maintenance. Resurfacing, signals.	% of statewide auto registration. % of property valuation within the county.	n/A	Not eligible for transit.
Motor Vehicle License Fees	License Fees Sec. 11005(a) Revenue and Tax Code	Streets and highway construction and maintenance. Resurfacing, signals.	Population based share of 50% of 81.25% of the balance.	$28.22 per capita	Not eligible for transit.
Motor Vehicle License Fees	License Fees Sec. 11005(b) Revenue and Tax Code	Streets and highway construction and maintenance. Resurfacing, signals.	Share of 18.75% of the balance divided between counties based on personal property tax and no tax cities.	$7.28 per capita	Statewide total approximately $229.5 million.

TABLE 3.6.3 SOURCES OF FORMULA ALLOCATION FUNDS FOR LOS ANGELES COUNTY FOR CMP MIGITATION

SOURCE	ORIGIN OF FUNDS	APPLICABLE USES	BASIS FOR APPORTIONMENT	AMOUNT AVAILABLE	OTHER COMMENTS
Surface Transportation Funds (STP)	ISTEA/SB 1435	Arterial improvements or construction operational improvements, capital for transit projects, safety improvements, planning, traffic management, fringe and corridor parking, bikeways, Transportation Control Measures per AQMP.	110% of funding levels from 1976 Federal Act. Programmed by MTA and SCAG.	$4.00 per capita	Requires 11.47% local match, construction, 2 years, inclusion in RTIP, and land use. Compliance with CMP. Non-discretionary portion available for CMP mitigation.
AB 2766	Additional $4 Motor Vehicle Registration Fee	Implementation of AQMP and CCAA relating to mobile sources of emissions.	40% total distributed to cities and counties.	$9.3 million statewide	Can be used for TDM strategies.

SOURCE: Marcia Mednick & Associates

The remaining 18.75 percent of the Motor Vehicle License Fees are allocated to cities that did not levy a property tax in the 1977-78 fiscal year (no-property-tax-cities); to cities which incorporated prior to June 5, 1987 and which are identified as low property tax cities; and to all counties. There are 20 cities in Los Angeles County which are eligible for the no-property-tax subvention. They receive annual amounts ranging from a low of $34,348 a city with a population of less than 8,000 to a high of $426,473 for a city with a population just under 100,000.

AB 2766 Funds - Assembly Bill 2766 provides for an additional $4.00 motor vehicle registration fee to fund implementation of the AQMP and provisions of the CCAA relating to mobile sources of emissions. Forty percent of the total collected, or $9.3 million statewide, is distributed on a population basis to cities and counties to be used in implementing programs to reduce air pollution from motor vehicles. These funds can be used for TDM.

Intermodal Surface Transportation Efficiency Act (ISTEA) Funds - The monies available from the collection of programs identified in the 1991 Intermodal Surface Transportation Efficiency Act (ISTEA) and clarified in California SB 1435 are apportioned to each city and county based on population. These replace previously received Federal Aid Urban and Secondary funds which cities and counties used for road and highway improvements. The ISTEA program provides substantially greater flexibility in allowable uses of funds. Surface Transportation Program (STP) funds established under ISTEA are intended for congestion relief. Eligible uses include transit capital projects, TDM, as well as arterial road improvements. In Los Angeles County, a portion of the funds, called STP Local funds or Guarantee funds are directly apportioned to the Cities and the County for eligible uses. These funds may be used for CMP deficiency plan mitigation projects. Local jurisdictions have been awarded these funds since 1990. However, they must comply with the CMP in order to continue receiving these monies. The entities receive 110 percent of the funding levels they received under the previous programs. All projects funded with federal STP funds require an 11.47 percent local match and projects must be included in the RTIP prepared by SCAG.

State Gasoline Taxes - The cluster of State Highway Users Taxes (Sections 2104, 2105, 2106, 2107, and 2107.5) collectively generate approximately $102 million for the County and $138 million for allocation to the cities from the state gasoline tax. These are distributed to the cities by their percentage of total population within the County for Section 2106 funds and by their percentage of total state population for Sections 2105 and 2107. County distribution formulas are more complex; Sections 2104 and 2105 rely on a formula based on the vehicle registration and the amount of maintained mileage, and Section 2106 is based on the county's percentage of

statewide automobile registration and percentage of property valuation. These State Highway User funds can be used for general street and highway purposes, which does not preclude their use for CMP eligible improvements. However, the monies available under Section 2105, which amount to 28 percent of the Highway User Taxes, are available to the cities and the county only if they comply with the provisions of the CMP. Section 2105 funds are the new gas tax funds created by the passage of the CMP legislation.

In addition, local jurisdictions which comply with the CMP are eligible to receive the following state and federal discretionary funds. These funds may not be used for project's which receive CMP deficiency plan mitigation credit.

State and Federal Discretionary Funds - These funding sources include the State Flexible Congestion Relief Funds (FCR), State Traffic System Management Funds (TSM), and Federal Congestion Mitigation and Air Quality Funds (CMAQ).

THRESHOLDS OF SIGNIFICANCE

Based on the expressed concerns of local jurisdictions' public service impacts are considered significant if (1) the public service benefits of compliance with the administrative implementation requirements of the proposed program do not outweigh the staff resource costs; or (2) compliance with the proposed program would result in a substantial diversion of city fiscal resources away from the provision of other public services.

IMPACTS

Administrative Implementation Impacts

Direct Impact: The intent of the State Legislature in passing the CMP legislation was to help develop California's economy to its full potential by providing a program for maintaining mobility on the regional transportation network. By maintaining mobility and providing a mechanism for addressing deficiencies on the network, the 1993 CMP Update will help to maintain or improve emergency vehicle response times. This would be a **beneficial impact** of both the CMP as a whole and the 1993 CMP Update.

Direct Impact: The State Legislature, through its passage of the CMP legislation imposed additional planning and reporting requirements on local jurisdictions. The MTA, in its development of the 1992 CMP and the 1993 CMP Update has attempted to design a program which minimizes the impact of legislated CMP requirements on local administrative resources. The 1992 CMP EIR acknowledged

the potential for the CMP to result in a diversion of local government personnel and revenues. As mitigation, the 1992 CMP EIR included requirements that (1) the MTA would work with local jurisdictions to investigate a countywide process to deal with future CMP implementation; and (2) the MTA would continue to work with public and private interests regarding CMP requirements to minimize adverse public/private cost impacts associated with the CMP. The 1993 CMP Update has been designed in consultation with local jurisdictions and other public and private interests. It is a countywide approach to deficiency mitigation, in keeping with the requirements of mitigations included in the 1992 CMP EIR.

General Administrative Costs of Compliance

Regardless of whether a jurisdiction chooses a demand reduction, capacity enhancing, or a combination approach to deficiency planning, the jurisdiction will experience certain administrative costs associated with report preparation, development tracking, and efforts to balance development specific and jurisdiction-wide mitigation efforts.

Demand Reduction Emphasis - Costs

The 1993 CMP Update deficiency plan procedures include a Phase II TDM option which is designed to reduce reporting requirements by providing an option to deficiency mitigation which meets both CMP and air quality compliance requirements. Regardless of whether a local jurisdiction chooses the Phase II TDM option or preparation of a deficiency plan which includes demand reduction measures, staff resources will be required, particularly during the initial years of the deficiency plan effort to formulate the parameters of demand reduction strategies, be they land use or TDM mitigation strategies, and to become familiar with reporting requirements.

Local jurisdictions are already required to formulate and report on locally implemented TCM measures aimed at demand reduction, however. Regardless of whether local jurisdictions coordinate their TCM effort with their deficiency planning, or their deficiency planning with their TCM effort, the incremental administrative burden of deficiency planning must be viewed within the context of existing TCM reporting requirements. This incremental administrative burden is further offset by the quantification of the trip reduction effects of various demand reduction strategies provided in the 1993 CMP Update. This quantification may further reduce the level of effort required of local jurisdictions as part of TCM reporting.

Capacity Enhancing Emphasis - Costs

Staff resources will be required, particularly during the initial years of the deficiency plan effort to become familiar with reporting requirements and to develop a mechanism for identifying capital improvements and TSM measures for inclusion in the deficiency plan. Part of the effort to identify TSM measures, however, is already occurring as part of the traffic analyses prepared for EIRs for mid to large-scale development projects. Local jurisdictions also already have experience in identifying and nominating capital improvement projects for inclusion in the RTIP. This effort is now part of the CMP process, but the effort was required in some form previously.

Public Service Benefits Resulting From CMP Compliance

Although compliance with the deficiency plan requirements would result in the use of staff resources, compliance with the CMP results in local jurisdictions obtaining Section 2105 and STP funds as well as being eligible for the following federal and state discretionary funds: FCR, TSM and CMAQ. In addition, some aspects of the 1993 CMP Update may create efficiencies that partially offset the administrative burden imposed by the 1993 CMP Update and the CMP program as a whole. Specifically: by encouraging cooperation between adjacent jurisdictions, the CMP may provide a transportation planning mechanism which ultimately requires fewer total staff members than if jurisdictions approached transportation planning and projects alone; the countywide approach to deficiency planning may provide a degree of certainty among jurisdictions, as well as the business community, which may reduce "over the counter" staff time; the experience of formulating deficiency plans should reduce the staff effort required of local jurisdictions to comply with air quality related reporting requirements, even if local jurisdictions do not choose the Phase II TDM deficiency plan option; when preparing EIRs for local projects, local jurisdictions can tier off the CMP EIRs and can demonstrate that regional impacts have been addressed by discussing local jurisdictional compliance with the deficiency plan component of the CMP; both the adopted CMP and the 1993 CMP update will result in the generation of data on transportation system performance and the effectiveness of deficiency plan measures which will provide local jurisdictions with additional information which may facilitate local transportation and land use planning.

Direct Impacts: Although the 1993 CMP Update will impose additional administrative requirements on local jurisdictions, these administrative "costs" are more than offset by the return in administrative time invested, that the jurisdiction will experience as a result of CMP compliance. This return takes the form of both access to formula allocation funds requiring CMP compliance, and the potential

administrative efficiencies created by the 1993 CMP. The administrative efficiencies created are greatest for local jurisdictions taking a demand reduction approach to deficiency mitigation, due to the ability to coordinate with TCM reporting. However, efficiencies are created through both a demand reduction and capacity enhancing approach to deficiency mitigation. Thus the fiscal and administrative efficiency benefits of compliance outweigh the administrative implementation costs of the 1993 CMP Update and the CMP as a whole. The proposed program would result in the use of additional staff resources, however, the impact is **not significant,** since the benefits of compliance outweigh the costs.

Fiscal Impacts

The 1993 CMP Update establishes a Tool Box of alternatives from which local jurisdictions may choose in order to offset their congestion mitigation goal, based on new development activity. Since each local jurisdiction faces its own unique set of demographic, fiscal, and political considerations the Tool Box incorporates a range of implementation options, including land use measures, TDM strategies, TSM, and capital improvement opportunities. These Tool Box measures can be implemented through a variety of funding mechanisms, including use of local revenue, imposition of direct transportation costs, use of development charges or fees, or use of land use incentives.

In selecting Tool Box measures it is anticipated that local jurisdictions will weigh specific public service needs in their community and funding considerations, and choose appropriate mitigation strategies that either enhance or minimize disruption to the jurisdiction's priorities. While the decision makers will have to weight the choice of implementation measures against the jurisdiction's specific objectives and constraints, there is a wide range of strategies included in the Tool Box to allow local jurisdictions flexibility in the choice of deficiency mitigation approaches. Local jurisdictions can choose any combination of strategies desired.

The degree to which compliance with deficiency plan requirements will result in fiscal impacts to local jurisdictions will depend on the ease of offsetting the mitigation debits from development with mitigation credits. An example of the level of effort required to offset the debits from a typical retail project was provided in Section 3.1 of this chapter. That example indicated that a hypothetical "average" local jurisdiction should be able to chose whether to approach deficiency mitigation through a mix of capital improvements and TDM measures, a capital intensive approach, or a traffic demand intensive approach. The Tool Box thus provides local jurisdictions with a great deal of flexibility regarding the choice of deficiency mitigation strategy.

Some of the mitigation strategies involve higher financial obligations than others. Such factors as local budgetary conditions, the revenue benefits of the project, the surrounding market conditions, and overall public benefit potential may affect how a particular jurisdiction responds regarding funding responsibilities. Since, local jurisdictions have a variety of funding approaches available for deficiency mitigation, the key question in assessing the fiscal impacts of the proposed program becomes whether or not there are sufficient funding mechanisms and mitigation options available for local jurisdictions to meet their deficiency mitigation obligations without needing to use general funds, or having to divert funds from the provision of other public services.

As discussed in Section 3.1 of this chapter, available funding mechanisms have been classified into four broad categories for analytic purposes. The availability of each of these funding mechanism for deficiency mitigation is described below:

Use of Local Revenue - A local jurisdiction could elect to pay for required mitigation measures through the wide array of formula allocated public funds which may be used for CMP deficiency mitigation. These funding sources were detailed in **Tables 3.6.2 and 3.6.3** and discussed under setting. These funds may be used for TSM, TDM and some types of capital improvements. These funds are targeted for these kinds of transportation related programs, and are not available for the provision of other public services. Therefor use of these funds should not result in a negative public service impact.

Imposition of Direct Transportation Costs - Some Tool Box mitigation measures, particularly TDM-intensive measures, could be funded by imposing direct costs, such as parking fees on users, such as drivers. This could potentially generate revenue for the local jurisdiction. This type of funding approach should not result in a negative public service impact.

Use of Development Charges or Fees - To pay for required mitigation measures, a local jurisdiction could require a development contribution. The amount and nature of the contribution could vary significantly depending on the degree to which local jurisdictions pursue capacity enhancing or demand reducing mitigations. This type of approach may be appropriate for TSM measures, particularly those specified as mitigations in development project EIRs, TDM, and some kinds of capital projects. This kind of approach would not require the use of public funds. As discussed in the land use section, the imposition of development charges could run the risk of discouraging development if the charges or fees cannot be passed on and readily absorbed. This could potentially discourage development and thus indirectly impact the local jurisdiction's tax revenues and thus the provision of public services. However, as a practical matter, the

jurisdictions most likely to impose charges or direct development mitigations would be those in which a significant amount of development is taking place, which is indicative of strong market support. Under strong market conditions, costs can be passed on to tenants and consumers in the form of higher leases or product prices, and no reduction in development activity will occur.

Use of Land Use Incentives - Local jurisdictions may elect to provide mitigation by creating development incentives which foster patterns of land use for which mitigation credit is available. Incentives would likely entail measures having a monetary value to developers, such as reduced parking requirements, increased density bonuses, and expedited project processing and approval times. There are a number of incentives available to local jurisdictions which do not require the use of public funds.

Direct Impact: Given these options, the variety of mitigation strategies available, and the sources of transportation specific funding available to local jurisdictions for deficiency mitigation, there appear to be adequate alternatives available to local jurisdictions to address the specific circumstances each might face. Therefore, **no significant impacts** on public service fiscal resources are anticipated from the 1993 CMP Update.

Indirect Impact: While it is difficult to predict how a particular community may respond with regard to the type of mitigation strategy that may be implemented, it is reasonable to expect that local jurisdictions will chose an approach which is consistent with the jurisdiction's current policies and which results in the least amount of disruption to the community. Since the mitigation strategies are intended to improve traffic flow throughout the region, it is logical to assume that a particular mitigation strategy should provide some public service improvements, including improved response time for emergency vehicles, improved air quality, and in some cases, additional services such as increased public transit opportunities. These would be **beneficial impacts** of the proposed program.

MITIGATION MEASURES

Although the administrative implementation impacts of the proposed program are less than significant the following mitigation will further reduce those impacts:

3.6.1 The MTA shall continue to work on both a state and regional level to integrate CMP deficiency plan reporting requirements with the reporting requirements associated with the AQMP in order reduce the administrative effort required by local jurisdictions.

In order to ensure that mitigation credits surplus can be carried over from year to year, the following mitigation is included.

3.6.2 The MTA shall allow local jurisdictions to carry-over from year to year any surplus credit points accumulated.

In order to ensure that local jurisdiction have a wide array of deficiency mitigation options, the following mitigation is included:

3.6.3 The MTA, as part of the biennial updates to the CMP, shall investigate adding additional measures to the Tool Box.

4.1 GROWTH INDUCING IMPACTS

The potential growth inducing impacts of the adopted Congestion Management Plan (CMP) were addressed in the Environmental Impact Report (EIR) for the 1992 CMP. The growth inducing impacts of the 1993 CMP would be essentially the same as for the adopted CMP. Therefore, the discussion from the 1992 CMP EIR is repeated here, with minor modifications based on the information contained in Chapter III of this EIR.

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 percent of the anticipated growth in population is anticipated to result from natural increase. The remaining 37 percent 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 port of entry for large numbers of Pacific Rim and Latin American migrants.

The purpose of the CMP legislation is to maintain mobility on the regional network in order to assist California's economy to develop to its full potential. The CMP and the 1993 CMP Update are oriented toward the mitigation of future deficiencies on the CMP system, with deficiencies defined as a change to Level of Service (LOS) E or additional degradation of portions of the system operating at LOS F. 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 proposed deficiency plan approach have the potential to result in a redistribution of population and employment within the region which could be classified as a growth inducing impact? The key questions are whether the 1993 CMP Update would result in a land use future which is

[1]Please see the discussion in the Regional Growth Management Plan (GMP). Pages II-2 to II-4.

significantly different than the policy land use future contained in the Regional Growth Management Plan (GMP) or which constitutes a systematic alteration in the markets for retail, office, industrial, or residential uses in the County.

As detailed in Chapter III, given the nature of the Tool Box, it is unlikely that the proposed deficiency plan approach would result in a substantial redistribution of land uses among jurisdictions in the County, for several reasons. First, while it is possible, in theory, that the imposition of exactions would increase the potential for development to shift to areas where there would be no exactions or other added development costs, that is not likely to be the case under the proposed deficiency plan approach. The potential for a jurisdiction in the County to capture development away from another jurisdiction is likely to be limited under the proposed deficiency approach, since the program affects all jurisdictions in the County and because the nature of the Tool Box measures and their funding make it unlikely that one jurisdiction will amass a substantial number of surplus mitigation credits which can be used to capture new growth. Secondly, it is unlikely that deficiency plan capital improvements would be concentrated in undeveloped portions of the County, such that they would induce growth. The type of capital improvements that are likely to be considered will in most cases be gap closure or retrofit projects on existing facilities that would not extend the County transportation system into less developed areas. Finally, the imposition of trip reduction measures for deficiency mitigation credit is unlikely to result in a redistribution of growth within the County which is attributable to the 1993 CMP Update, since the trip reduction goal of the 1993 CMP Update is less than the trip reduction goal under the Air Quality Management Plan (AQMP).

Similarly, the 1993 CMP Update is unlikely to result in a redistribution of growth between Los Angeles County and the other counties in the region which would be substantially different than the policy forecast. This is true because each of the counties in the region is charged with helping to work toward implementation of the Regional Mobility Plan (RMP), is subject to the CMP legislation and thus must also require deficiency planning by local jurisdictions, and will be subject to the trip reduction goals of the AQMP.

In addition, the proposed deficiency plan approach is unlikely to result in a substantial alteration in the markets for office, retail, industrial or housing. In general, 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 lead 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 lead 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. In addition, market forces have resulted in the existing distribution of land uses within this largely developed County. When compared to the power of locational decisions that are based on market forces and quality of life issues, the deconcentration or redistributional effect of the 1993 CMP is arguably not significant.

Both very good and very bad LOS 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 deficiency planning effort will be to attain LOS standards. It is unlikely that improvements on the system will bring LOS above standard. Because the 1993 CMP Update is not anticipated to lead to substantial improvements above current LOS and associated increases in travel speed which would make housing in outlying areas more attractive to the region's workers it should not further the kind of deconcentration that results from ease of mobility. Similarly, by maintaining mobility at established LOS, the CMP will not encourage deconcentration related to avoidance of congestion.

In summary, the impact of the 1993 CMP on land use is anticipated to be negligible when compared to existing market and quality of life issues. The 1993 CMP will help to implement the goals and policies contained in the RMP and AQMP, but the major transportation planning and air quality objectives of these plans will not be met by the CMP alone. Thus the effects of the 1993 CMP are consistent with, but less than the effects of these two regional plans.

The other potential localized growth inducing affect of the CMP would be the encouragement of increased concentration around transportation centers and corridors. Deficiency plan projects 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 1993 CMP Update, as it would be consistent with the objectives of the GMP. Thus, the 1993 CMP is consistent with local growth and density goals.

4.2 CUMULATIVE IMPACTS

As previously discussed, the CMP is both consistent with and would aid achievement of the RMP and the AQMP 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 jurisdictions in the County.[2] **Table 4.1** 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 EIR for the RMP. 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** - Transportation Demand Management (TDM), Transportation System Management (TSM), growth management and AQMP Transportation Control Measures (TCM) 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., 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.

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[2]The EIRs for the RMP and GMP have been previously incorporated herein by reference. The Final EIR for the Los Angeles County General Plan (dated March 1981) is herein incorporated by reference (SCH No. 87-121613). These documents are available for review at the MTA's offices located at 818 West Seventh Street, Los Angeles, California 90017.

TABLE 4.1 CUMULATIVE DEVELOPMENT

	Southern California	Los Angeles Region
Population	Would increase to 8.9 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	VMT would increase to 284,382,000 by the Year 2010. 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. 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.	The facilities described in the setting section of the transportation section of Chapter III would be constructed. The STIP projects and the TSM projects would be built.[1]
Air Quality	Emission in tons per day would be as follows in the Year 2010: ROG - 231 NOX - 281 SOX - 36 PMIO - 44 CO - 2,259	Mobile emission in tons per day would be as follows in the Year 2010 under baseline conditions:[2] ROG - 38 NOX - 87 SOX - 20 PMIO - 36 CO - 590

Note: 1) These projects are listed in Appendix D and Table 5 of the 1992 CMP EIR.
2) Based on estimates contained in Chapter 3, Section 3 of this EIR.

SOURCE: SCAG, RMP EIR

- **Biological Resources** - Several of the new highways and transportation corridors planned for the region traverse sensitive areas and will cause 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 EIRs.

- **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 GMPs and supporting EIRs.

- **Social Impacts** - Regional transportation improvements 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 GMPs 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.

In addition to these impacts, the cumulative addition of local jurisdictional planning, program implementation, and reporting requirements, which are not accompanied by additional funding, has a cumulative impact on local jurisdictional staff and fiscal resources and the ability of local jurisdictions to maintain existing levels of public service provisions.

4.3 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The 1993 CMP Update would result in the creation of additional air quality hot spots. The potential for significant adverse project level impacts to remain after implementation of the project specific mitigations specified in the 1992 CMP EIR, incorporated herein, and contained in Appendix B, and mitigation developed as part of deficiency plan project specific environmental review, can only be assessed on a project specific basis.

4.4 SHORT-TERM USES VERSES LONG-TERM PRODUCTIVITY

As with the RMP and adopted CMP, many of the potential adverse impacts associated with the 1993 CMP Update are due to construction of deficiency plan related 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 and the addition of the 1993 Update. 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 impact on biological resources.

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

Public Services - With mitigation, the CMP is not anticipated to result in a long-term impact on public services. 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

In adopting the Regional Mobility Plan (RMP), the Southern California Association of Governments (SCAG) analyzed five alternatives to the adopted RMP.[1] Those alternatives were: the No-Project Alternative; a Facility-Intensive Response to Growth Trends Alternative; a Facility-Emphasis with Balanced Growth Alternative; a Demand Management Emphasis with Balanced Growth Alternative; and a Demand Management Response to Growth Trends Alternative. The Congestion Management Program (CMP) is required to be consistent with the RMP. Chapter V of the Environmental Impact Report (EIR) for the adopted 1992 CMP summarized the findings of the RMP alternatives analysis. That discussion is herein incorporated by reference.

The EIR for the adopted 1992 CMP contained an analysis of four alternatives to the 1992 CMP: a No-Project Existing Transportation System Alternative; a No-Project, No Future State Funding Alternative; and two alternatives designed to be consistent with the adopted RMP, but which stressed assistance in meeting different portions of the RMP program, a Transportation Demand Management (TDM) Intensive Alternative and a Capital Intensive Alternative. That discussion is herein incorporated by reference.[2]

This 1993 CMP EIR, therefore, looks at alternatives to the proposed 1993 CMP Update. Specifically this analysis focuses on alternatives to the proposed deficiency plan strategy. The five alternatives analyzed are as follows:

Alternative 1 - The No-Project Alternative (No Deficiency Plan Addition)
Alternative 2 - The No-Countywide Deficiency Plan Alternative
Alternative 3 - The Countywide Fee Alternative
Alternative 4 - The Monitoring-Based Approach Alternative
Alternative 5 - The Modified Tool Box - Hot Spot Reducing Approach Alternative

Alternative 1 is the California Environmental Quality Act (CEQA) mandated No-Project Alternative.[3] Alternatives 2, 3, and 4 are alternatives which were seriously considered by the Los Angeles County Metropolitan Transportation Authority (MTA), but rejected because they did not meet the MTA's goals and objectives in adopting a deficiency plan component of the CMP. Alternative 5 has been

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[1]Please see Chapter 6 of the Draft EIR for the RMP (State Clearinghouse No. 87-121613) previously incorporated herein by reference.

[2]Please see Chapter V of the 1992 CMP EIR, State Clearinghouse No. 91121063.

[3]See CEQA Guidelines, Section 15126, subd. (d)(2).

developed with the intent of reducing one of the few significant impacts identified for the 1993 CMP Update, hot spot air quality impacts.

5.1 THE NO-PROJECT ALTERNATIVE (NO DEFICIENCY PLAN ADDITION)

Under this alternative, no deficiency plan component would be added to the CMP and the MTA would not review and approve any deficiency plans generated by local jurisdictions. The existing adopted CMP would remain in place. The lack of a deficiency plan mechanism would result in local jurisdictions losing their Section 2105 monies, losing their ability to compete for state funding through the State Transportation Improvement Program (STIP), and the loss of federal funds linked to compliance with the CMP. The net result would be no change in the existing transportation system. None of the programmed improvements would be built. This alternative would have the same impacts as the No-Project (Existing System) Alternative discussed in the 1992 CMP EIR.

Transportation - On a systemwide basis, this alternative would result in 10,911,636 vehicle hours of travel (VHT), 5,661,786 hours of delay, and 218,389,015 vehicle miles of travel (VMT) in the region, compared to 7,945,118 VHT, 2,467,030 hours of delay, and 205,154,425 VMT under the worst case (Countywide use of only capacity enhancement Tool Box strategies) for the proposed deficiency plan approach.

Air Quality - Under this alternative air quality emissions would be substantially higher than with the proposed project. Year 2010 emissions are estimated at 707 tons per day (tpd) of Carbon Monoxide (CO), 38 tpd of Ozone (ROC), 87 tpd of Nitrogen Dioxide(NOX), 22 tpd of Sulfur Dioxide (SOX), and 38 tpd of particulates (PM10) compared to 597 tpd of CO, 38 tpd of ROC, 88 tpd of NOX, 20 tpd of SOX, and 36 tpd of PM10 under the worst case scenario (Countywide use of only capacity enhancement Tool Box strategies) for the proposed deficiency plan approach.

Energy - Fuel consumption due to VMT in the County would be significantly greater under this alternative than under the proposed deficiency plan approach, 8.3 million gallons per day, compared to 7.8 gallons per day under the worst case (Countywide use of only capacity enhancement Tool Box strategies) for the proposed deficiency plan approach.

Land Use - Under this alternative, the transportation system would not be improved to accommodate anticipated growth. This would have a significant effect on future land use. It can be expected that land use would be displaced from congested core parts of the County to areas of the County where the

transportation system still had existing capacity. In addition, growth would be displaced to other adjacent counties which were still making the transportation improvements included in the RMP. Both the displacement within the County and the displacement to other counties would result in additional urban sprawl, which would in turn have an indirect impact on air quality not anticipated in the model runs which are the basis of the air emission figures cited above.

Public Services - The loss of funding for transportation improvements would likely result in local jurisdictions using additional general fund revenues for maintenance of the transportation system. This would have a significant impact on public service provision. Increased congestion on the regional network would increase emergency vehicle response times, which would be a significant impact under this alternative.

This alternative would not comply with the requirements of the CMP statute since there would be no deficiency plan component incorporated in the CMP by the time deficiencies are identified on the CMP network. This alternative would fail to fulfill the aims of the CMP legislation and would be inconsistent with the RMP. It is, therefore, not considered feasible.

5.2 THE NO-COUNTYWIDE DEFICIENCY PLAN ALTERNATIVE

Under this alternative no uniform Countywide approach to deficiency planning would be adopted. Instead, the CMP Update would specify the general content of deficiency plans, and local jurisdictions would be left to develop their plans individually. Local jurisdictions would also be responsible for determining the degree to which mitigations result in an improvement in deficiency conditions. Plans would then be submitted to the MTA for review and approval.

Under this alternative, local jurisdictions would be held responsible for mitigating any deficiencies identified on portions of the network within their jurisdiction, regardless of the degree to which they contributed to the creation of the deficiency, since no method for sharing responsibility for deficiency creation would be in place. Jurisdictions on portions of the network serving as key connectors between portions of the County would be unfairly burdened with the responsibility for mitigating deficiencies on these segments. Imposition of additional TDM requirements within the impacted jurisdiction may have little impact on curing a deficiency, since the deficiency may be largely the result of trips originating and terminating in other jurisdictions. This would mean that deficiency mitigation would primarily take the form of capacity enhancements, which have less environmental

benefit than trip reduction approaches, as a general rule.[4] Local jurisdictions on heavily traveled portions of the network would thus have the burden of major capital improvements. Jurisdictions faced with mitigation costs which exceeded the funds available to the jurisdiction from public or private sources could potentially choose to not participated in the CMP and thus lose their Section 2105 funding, their ability to complete for state funding through the STIP, and all federal funds that are linked to compliance with the CMP.

Transportation - This alternative would not encourage the degree of additional TDM activities encouraged by the proposed program, and it would place a greater responsibility for the funding of capacity enhancing mitigations on jurisdictions containing heavily traveled portions of the network which act as regional connectors. This approach would increase the probability that identified deficiencies would not be mitigated, which would have a significant impact on the maintenance and improvement of the transportation system, as well as the consistency of the CMP with the RMP.

Air Quality - It is anticipated that air quality emissions would be somewhere between the levels identified for the Baseline Scenario and the levels identified for the capacity enhancement scenario for the proposed program. Air quality emissions would, therefore, be higher than under the proposed program.

Energy - Similarly, it is anticipated that energy use would be somewhere between the levels identified for the Baseline Scenario and the levels identified for the capacity enhancement scenario for the proposed program. Energy use would thus be greater than under the proposed program.

Land Use - Under this alternative, it is anticipated that unmitigated deficiencies may occur on portions of the network which serve as major County connectors and that the jurisdictions containing these portions of the network would have disproportionately high mitigation costs, which would effect their ability to mitigate deficiencies, as well as the likelihood they would enact deficiency mitigation related fees or exactions. Since the urban core portions of the County are the portions containing the majority of these segments of the network, this alternative may result in additional urban deconcentration as potential growth responds to either the additional congestion which could occur under this alternative, or the higher mitigation costs in core areas which might occur under this alternative.

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[4]Please see the discussion of the capacity enhancement and trip reduction scenarios used to bracket the range of impacts of the proposed program. This discussion is contained in Sections 3.2, 3.3, and 3.4 of this EIR.

Public Services - Under this alternative, jurisdictions containing portions of the network which serve as major regional connectors would have higher mitigation costs and less ability to mitigate deficiencies through TDM and land use controls than under the proposed program, thus their mitigation costs would be higher. This could result in public service provision impacts. Unmitigated deficiencies would result in increases in the response times of emergency vehicles, which would be a significant public service impact. In addition, the lack of deficiency plan development assistance under this alternative could increase local jurisdictional staff resources used for plan development substantially.

This alternative does not meet the MTA's deficiency plan goals and objectives regarding provision of a Countywide approach, minimization of administrative costs, consistency among jurisdictions, sensitivity to the economy or jobs, or promotion of inter-jurisdictional mitigation. It is unclear the degree to which the alternative meets the MTA's remaining goals of effectiveness and flexibility of actions or transit enhancing land use. Therefore, this alternative was rejected by the MTA.

5.3 THE COUNTYWIDE FEE ALTERNATIVE

The Countywide Fee Alternative received extensive investigation, prior to rejection by the MTA Board, as part of the development of the adopted CMP. Under this alternative, a Countywide traffic impact fee would be imposed on new development. It would be established based on a nexus study which would establish the casual connection between the creation of deficiencies on the network and development activity. The fee would be used to fund capacity enhancements on the regional network.

Transportation - This alternative would have similar transportation system benefits as the capacity enhancement scenario discussed for the proposed program. Therefore, the benefits would be somewhat less than under the proposed program, which is likely to result in a combined use of demand reduction and capacity enhancement strategies, on a Countywide basis.

Air Quality - This alternative would have similar air quality benefits as the capacity enhancement scenario discussed for the proposed program. Therefore, the benefits would be somewhat less than under the proposed program, which is likely to result in a combined use of demand reduction and capacity enhancement strategies, on a Countywide basis.

Energy - This alternative would have similar energy benefits as the capacity enhancement scenario discussed for the proposed program. Therefore, the benefits would be somewhat less than under the proposed program, which is likely

to result in a combined use of demand reduction and capacity enhancement strategies, on a Countywide basis.

Land Use - The countywide fee would be imposed Countywide. It is possible that this would make development less attractive in areas with weak markets, than in areas with strong markets, but it is difficult to ascertain without conducting special land use impact related studies for this alternative, whether or not it would result in a systematic displacement of land uses. Any development inhibiting impacts of this alternative are likely to be greater than under the proposed program, which allows flexibility in the degree to which mitigations are funded with public or private resources.

Public Services - This alternative would not require local jurisdictions to use their existing fiscal resources to fund capacity enhancements under deficiency plans. Less staff resources would be required for deficiency planning purposes than under the proposed program, since much of the responsibility for deficiency mitigation identification and implementation would be conducted by the MTA. This alternative is, therefore, likely to have less public service impacts than the proposed program. If this alternative did, however, act as a disincentive to development activity within the County, it could have an indirect impact on local jurisdictional fiscal resources by reducing revenues.

This alternative was rejected by the MTA because it met fewer of the MTA's deficiency plan goals and objectives than the proposed program. Specifically, it did not provide the deficiency mitigation and funding flexibility of the proposed program, the sensitivity to the economy or jobs, or the transit-enhancing land use effects. It does meet the MTA's goals regarding a Countywide approach, minimization of administrative costs, consistency among jurisdictions, and the promotion of inter-jurisdictional mitigation.

5.4 THE MONITORING BASED APPROACH ALTERNATIVE

Under this alternative, the MTA would not provide a mitigation Tool Box. Instead, each local jurisdiction would select their own mitigation measures, monitor their effectiveness, and get credit based on the demonstrated effectiveness of their mitigation measures.

Local jurisdictions would still be responsible for calculating and mitigating the effects of development within their boundaries. The impacts of new development activity would still be calculated according to formulas prepared by the MTA staff and used countywide. However, rather than using the standardized list of options for mitigation credits, where the benefits have been prequantified by the MTA staff, each local jurisdiction would implement its own measures and, through monitoring,

determine their effectiveness in reducing the impacts of new development. The monitoring results would be submitted to the MTA for their evaluation. This alternative would add a strong element of uncertainty to the process of compliance with the CMP.

Transportation - Because jurisdictions could tend to select mitigation options where the benefits could be easily monitored and ascertained, there would be a concentration of certain capital improvements, traffic system management improvements and those demand management options that are easily quantified. Land use measures and those demand management measures that reduce or shorten the long term need for trips would be harder to monitor or quantify and would tend to be selected less frequently. As a result, this alternative is likely to result in selection of more capacity enhancing measures than the proposed project.

Air Quality - Because the selection of mitigation measures would be skewed towards capacity enhancement measures, this alternative could have similar air quality effects as the capacity enhancement scenario discussed for the proposed program. Therefore, the air quality benefits would be somewhat less than under the proposed program, which would result in selection of a mix of demand reduction and capacity enhancement measures.

Energy - Because the selection of mitigation measures would be skewed towards capacity enhancement measures, this alternative would have a similar energy use effect as the capacity enhancement scenario discussed for the proposed program. Therefore, the energy benefits would be somewhat less than under the proposed program, which would result in selection of a mix of demand reduction and capacity enhancement measures.

Land Use - While this alternative would continue the flexibility of allowing jurisdictions to choose their mitigation strategies, the short term difficulty in quantifying or monitoring the benefits of transit facilities could decrease the attractiveness of these types of mitigation strategies. This alternative could, therefore, provide less incentives for local jurisdictions to consider the siting of new development in close proximity to transit facilities.

Public Services - This alternative would place substantially more responsibility on local jurisdictions. The monitoring based approach would eliminate the element of certainty that exists in the Tool Box approach, and the reporting process would be substantially lengthened. In addition, jurisdictions would have to select appropriate monitoring strategies and conduct their monitoring on a regular basis. After implementation and monitoring a strategy, local staffs might find that it did not produce the anticipated results; they would then have to select and implement

additional strategies to mitigate their development credits. This alternative would also make the mitigation process much more subjective, requiring additional staff time from the local jurisdiction as well as from the MTA staff. The larger burden on both staffs could result in increased administrative costs for the local jurisdiction and the MTA and result in less allocated and discretionary funds available for project implementation.

This alternative was rejected by the MTA because of the administrative cost to local jurisdictions and the MTA, and because it did not meet the MTA's goals and objectives regarding transit enhancing land use, effectiveness and flexibility of actions, sensitivity to the economy and jobs, and consistency and fairness among communities and developments.

5.5 THE MODIFIED TOOL BOX - HOT SPOT REDUCING APPROACH ALTERNATIVE

Under this alternative, those Tool Box measures which are likely to result in air quality hot spots would be eliminated from the Tool Box. Strategies targeted for removal would include: land use strategies which result in an intensification of land use; rideshare support facilities such as passenger loading areas for carpools; capital improvements such as park and ride lots, transit and goods movement facilities, High Occupancy Vehicle (HOV) lanes and general use highway lanes; and some transportation systems management improvements, such as, potentially some intersection modifications.

Transportation - Classes of project's included in the RMP would be precluded from nomination for STIP funding under this alternative. The prohibition on projects which create air quality hot spots would, therefore, be inconsistent with the RMP. This would invalidate the CMP and could, under a worst case scenario, result in the same effect as the No-Project Alternative.

Air Quality - As long as sufficient strategies remain in the Tool Box to allow local jurisdictions to meet their mitigation obligations, air quality impacts should be similar on a regional level as under the proposed program.

However, elimination of all hot spot producing mitigations is likely to constrain the choices available to jurisdictions such that impacts would be somewhere between those of the proposed program and the No-Project Alternative. If this alternative is found inconsistent with the RMP, the effect could be the same as the No-Project Alternative. This alternative would reduce or eliminate the hot spot impacts identified for the proposed program.

Energy - As long as sufficient strategies remain in the Tool Box to allow local jurisdictions to meet their mitigation obligations, energy impacts should be similar on a regional level as under the proposed program. However, elimination of all hot spot producing mitigations is likely to constrain the choices available to jurisdictions such that impacts would be somewhere between those of the proposed program and the No-Project alternative. If this alternative is found inconsistent with the RMP, the effect could be the same as the No-Project Alternative.

Land Use - Land uses effects would generally be similar as those under the proposed program as long as deficiency mitigation occurred. Otherwise, land use effects would be similar to the No-Project Alternative.

Public Services - This alternative would provide local jurisdictions with fewer Tool Box measures and thus less flexibility in meeting deficiency mitigation targets. Less flexibility could result in greater staff resources needed for deficiency planning and greater use of fiscal resources. Local jurisdictions would be limited in the projects they could nominate for the STIP. If this alternative is found inconsistent with the RMP, local jurisdictions could lose their Section 2105 funding, their ability to compete for state funding through the STIP, and all federal funds that are linked to compliance with the CMP.

This alternative would provide less flexibility of action than under the proposed program. It may be difficult to achieve the MTA's goals and objectives regarding the promotion of transit enhancing land uses, and this alternative may not be found consistent with the RMP. Given the number of strategies which could product hot spots, this alternative is unlikely to meet the CMP statute's requirement to measurably improve congestion and air quality.

5.6 THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Alternative 5, the Hot Spot Reducing Approach will have less air quality hot spot creating impacts than the proposed program. However, regional air quality impacts may be greater if the Alternative is found inconsistent with the RMP. By providing for fewer Tool Box measures, the alternative will make it more difficult for local jurisdictions to meet their deficiency mitigation obligations. This may result in greater public service impacts than the proposed program. This alternative is, therefore, not clearly environmentally superior to the proposed program. It would be clearly inferior to the proposed program if found inconsistent with the RMP.

In addition, this alternative would be less able to meet the MTA's deficiency plan approach goals and objectives. It would provide less flexibility of action than under the proposed program and it may be difficult to achieve the MTA's goals and objectives regarding the promotion of transit enhancing land uses.

The other alternatives are clearly inferior to the proposed 1993 CMP Update deficiency plan approach. Alternative 1, the No-Project Alternative, would have negative transportation, air quality, energy, land use, and public service impacts. Alternative 2, the No-Countywide Deficiency Plan Approach Alternative, would have less air quality and energy benefits than the proposed program and it could have negative transportation, land use, and public service impacts. Alternative 3, the Countywide Fee Alternative, would have less transportation, air quality, and energy benefits than the proposed program, and could have land use impacts. Public service effects may be less than under the proposed program, however, Alternative 4, the Monitoring Based Approach Alternative, would have less transportation, air quality, and energy benefits than the proposed program. It would encourage less densification around transit stations and it would result in significant public service impacts.

VI. REPORT AUTHORS AND CONSULTANTS, PEOPLE AND ORGANIZATIONS CONSULTED

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The transportation analysis contained in this report was prepared by Meyer, Mohaddes Associates, Inc. Mr. Gary Hamrick was the Task Manager.

The land use, air quality, and energy analyses contained in this report were prepared by Terry A. Hayes & Associates. The Mitigation Monitoring Program for the proposed project was also prepared by Terry A. Hayes & Associates. Mr. Terry Hayes was the Task Manager.

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APPENDIX A - LIST OF ACRONYMS

APPENDIX A

LIST OF ACRONYMS

AQMP	Air Quality Management Plan
CARB	California Air Resources Board
CCAA	California Clean Air Act
CEQA	California Environmental Quality Act
CIP	Capital Improvement Program
CMA	Congestion Management Agency
CMAQ	Congestion Mitigation and Air Quality
CMP	Congestion Management Program
CO	Carbon Monoxide
Commission	Los Angeles County Transportation Commission
EIR	Environmental Impact Report
FCR	Flexible Congestion Relief
GMP	Growth Management Plan
HOV	High Occupancy Vehicle
ICU	Intersection Capacity Utilization
ISTEA	Intermodal Surface Transportation Act
LACTC	Los Angeles County Transportation Commission
LOS	Levels of Service
MTA	Los Angeles County Metropolitan Transportation Authority
NOP	Notice of Preparation
NOX	Nitrogen Dioxide
OZ	Ozone
PAC	Policy Advisory Committee
PM 10	Particule Meter Less Than 10 Microns
PMT	Person Miles of Travel
RHNA	Regional Housing Needs Assessment
RMP	Regional Mobility Plan
ROG	Reactive Organic Gas
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCRTD	Southern California Rapid Transit District
SIP	State Implementation Plan
SOX	Sulfur Dioxide
SRTP	Short Range Transit Plan
STIP	State Transportation Improvement Program
TCM	Transportation Control Measure
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis

LIST OF ACRONYMS (Cont.)

TSM	Traffic System Management
UG/M3	Microns Per Cubic Meter
V/C	Volume/Capacity Ratio
VHT	Vehicle Hours Traveled
VMT	Vehicle Miles Traveled

APPENDIX B - MITIGATION MONITORING PROGRAM 1992 CMP

TABLE S-1: SUMMARY OF IMPACTS AND MITIGATION MEASURES

ENVIRONMENTAL IMPACT		MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
A. LAND USE			
Direct Impact: 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.
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.	A.2	The LACTC shall participate in on-going forums, regarding interjurisdicational 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)

ENVIRONMENTAL IMPACT		MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
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 (see Table 5) Class 2 and 3 projects present the greatest potential for disruption.	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.	Less than significant.
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.		None required.	Beneficial Impact
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.	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.	Less than Significant

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
B. TRANSPORTATION		
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.	None required.	Significant Beneficial Impact
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. 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.	Mitigation measure A.4 would mitigate the direct effects of the CIP element of the CMP. 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.	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.
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 onthe	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)

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
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.		
Direct Impact: The Highway and Transit Elements would provide monitoring information to assist in planning.	None Required	Beneficial Impact
C. AIR QUALITY		
Direct Impact: The CMP conforms with the AQMP and would help to improve regional air quality in the County	None Required	Significant Beneficial Impact

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
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 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.	In addition to mitigation measure B.1, the following mitigation measures would partially mitigate direct impacts associated with CMP CIP projects: 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 SCAQMD daily emissions thresholds, as well as to California Ambient Air Quality Standards (CAAQS); • consistency with the Air Quality Management Plan;	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.

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

ENVIRONMENTAL IMPACT		MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
• 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.		• 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.	
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.	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.	Less than Significant.

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

ENVIRONMENTAL IMPACT		MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
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.	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.	Less than Significant
D. NOISE			
Noise from the construction of CIP projects may be disruptive. 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.	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: • 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.)	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.

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
- 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.	• 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)

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
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.	Mitigation measure C.3 addresses indirect noise impacts.	Less than significant.

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
E. GEOLOGY		
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.	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. • the appropriate level of coordination with the State Division of Mines and Geology and identify specific mitigation measures to be implemented.	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.

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	• 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.	
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.	Mitigation measure C.3 addresses indirect geological impacts.	Less than Significant

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
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.		
F. WATER		
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-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.	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	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.

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	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. • 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)

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
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. Deconcentration could also decrease the amount of open land that is currently available for ground water recharge, either through natural means or though 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.	Mitigation measure C.3 would reduce the indirect impacts of the CMP of beneficial uses and the water supply/demand balance:	Less than Significant

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
G. BIOLOGICAL RESOURCES		
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.	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.	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.

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	• 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. • Appropriate consultation with the California Department of Fish and Game occurs to determine is 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 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.	

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	• 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	
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	Mitigation measure C.3 would reduce the indirect impacts of the CMP on biological resources.	Less than significant.

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
contained in Chapter IV - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.		
H. CULTURAL 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. 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	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: • 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.	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.

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
Service standards. This could potentially lead to impacts on historic structures as part of CIP projects.	• 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	

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

ENVIRONMENTAL IMPACT	MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	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, including locally designated resources, and includes appropriate mitigations.	
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.	Mitigation measure C.3 would reduce the indirect impacts of the CMP on historic resources:	Less than significant.

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

ENVIRONMENTAL IMPACT		MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
I. PUBLIC SERVICES			
Direct Effects: The construction of individual CIP projects may temporarily slow police and fire department responses and disrupt access. 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.	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: • 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 project to be located in proximity to a school, which includes an assessment of traffic, noise, and access 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.

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

ENVIRONMENTAL IMPACT		MITIGATION	LEVEL OF SIGNIFICANCE AFTER MITIGATION
	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	
Local governments' compliance with the CMP could result in the diversion of local government personnel and revenues.	I.3	The LACTC shall work with local jurisdictions to investigate a county-wide process to deal with future year CMP implementation.	With implementation of the mitigation measures listed, impacts are not anticipated to be significant.
	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.	

APPENDIX C - INITIAL STUDY, NOTICE OF PREPARATION (NOP) AND RESPONSES TO NOP

Los Angeles County
Metropolitan
Transportation
Authority

818 West Seventh Street
Suite 300
Los Angeles, CA 90017

213.623.1194

NOTICE OF PREPARATION AND INITIAL STUDY

To: All Interested Agencies, Organizations, Parties and Persons

From: Los Angeles County Metropolitan Transportation Authority

Subject: Notice of Preparation of a Draft Environmental Impact Report and Initial Study

Project: 1993 Congestion Management Program for Los Angeles County

The Los Angeles County Metropolitan Transportation Authority (MTA) will be the Lead Agency for the preparation of an Environmental Impact Report for the 1993 Congestion Management Program for Los Angeles County (CMP). We encourage the submittal of comments from agencies regarding 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 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 labelled separately.

Due to the time limits of State law, your response must be sent at the earliest possible date, but not later than 5:00 p.m. on June 23, 1993. Facsimile submittals will be accepted provide they are received prior to the deadline, and are sent only to (213) 244-6025. Please address your responses to Kendra Morries, Land Use Project Manager, Congestion Management Program, at 818 West Seventh Street, M/S 2200, Los Angeles, California 90017. Please include the name of a contact person.

A description of the proposed 1993 Congestion Management Program and the potential environmental effects of the proposed program are contained in the attached Initial Study. More information on the Congestion Management Program is available 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.

KENDRA MORRIES
Kendra Morries
Land Use Project Manager
Congestion Management Program
(213) 244-6579

MAY 21, 1993
Date

Los Angeles County
Metropolitan
Transportation
Authority

818 West Seventh Street
Suite 300
Los Angeles, CA 90017

213.623.1194

INITIAL ENVIRONMENTAL STUDY
1993 CONGESTION MANAGEMENT PROGRAM (CMP)

I. BACKGROUND

1. Name of Proponent: Los Angeles County Metropolitan Transportation Authority

2. Address of Proponent: 818 West Seventh Street, MS-2200, Los Angeles California, 90017

3. Date of Environmental Assessment: May 1993

4. Contact Person: Kendra Morries, Land Use Project Manager, Congestion Management Program, (213) 244-6579

5. Name of Proposal: 1993 Congestion Management Program for Los Angeles County

6. Location of Proposal: Los Angeles County

Assembly Bill 152, signed by Governor Pete Wilson on May 19, 1992, merged the Los Angeles County Transportation Commission (LACTC) and Southern California Rapid Transit District (SCRTD) into the new Los Angeles County Metropolitan Transportation Authority (MTA). Effective February 1, 1993, the new MTA assumed responsibility for all programs and services previously provided by LACTC and SCRTD. Among these will be the responsibilities of the Congestion Management Agency and the implementation and administration of the CMP. Therefore, the new MTA has been referred to throughout this document.

In November of 1992 the Los Angeles County Metropolitan Transportation Authority (MTA) adopted the first Congestion Management Program (CMP) for Los Angeles County and certified the accompanying Final Environmental Impact Report (EIR). That EIR is a Program EIR and is tiered from the EIR for the 1989 Regional Mobility Plan (RMP). The CMP is required by law to be consistent with the RMP which is prepared by the Southern California Association of Governments (SCAG). The EIRs for both the 1992 CMP and RMP are incorporated herein by reference.[1]

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[1] *Los Angeles County Congestion Management Program Final Environmental Impact Report*, November 1992 (SCH NO. 91121062; SCAG Clearing House #LA55791-MT); *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. Portions of the CMP EIR are summarized in

Because the CMP was a new program, the MTA adopted a first year CMP that was designed to meet the basic legislative requirements for a CMP and to establish a countywide planning framework for addressing congestion on the regional transportation network. The requirement for a CMP originated in the State Legislature with the passage of Assembly Bill 471 (1989) and Assembly Bill 1791 (1990). The requirement for a CMP became effective when California voters approved Proposition 111 in June of 1990, which increased the state gas tax by nine-cents-per-gallon. These revenues are expected to generate approximately $18.5 billion 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, established in Section 65088 through 65089.2 of the California Government Code.

Each urban county in the state is required to designate a Congestion Management Agency (CMA) to develop and periodically update a CMP. The Los Angeles County Metropolitan Transportation Authority (MTA) is the CMA for Los Angeles County. Preparation of a CMP is a condition for eligibility to receive the new gas tax subventions. Government Code Section 65089 (b) requires that each CMP contain the following 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 within 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.

The adopted 1992 CMP for Los Angeles County approached each of the elements required by CMP statute as follows:

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relevant sections of this Initial Study. All three EIRs are available for review at the offices of the MTA located at: 818 West Seventh Street, Los Angeles, California 90017.

- **Highway System.** Designation of 1,000 miles of freeways, state highways and roads as the CMP system in Los Angeles County. Over time, CMP effectiveness will be measured by the Levels of Service (LOS) on this system. Levels of Service range from "A" (free-flow) to "F" (heaviest congestion). One of the objectives of the CMP is to maintain this system at LOS E, or prevent further degradation if it's already at "F".

  Traffic volumes were measured during spring 1992 to establish the base year LOS. This base year monitoring provides the first uniform countywide picture of how our transportation system is currently operating. Local jurisdictions and Caltrans will take these measurements annually which will help track changes in travel patterns, determine the impact of growth on countywide mobility, and determine the effect of transportation improvements.

- **Transit Standards.** Designation of a transit monitoring network comprised of transit routes on, or parallel to, the CMP highway system. Information gathered annually about passenger volumes, seat capacity, and travel speed in broad transit corridors will provide a picture of how transit assists in relieving congestion and where transit will be needed in the future.

- **Transportation Demand Management (TDM).** Transportation Demand Management programs encouraging transit ridership, carpooling, vanpooling, bicycling, or otherwise reducing the number of vehicles on the road. The CMP required local jurisdictions to adopt their own TDM ordinance by April 1, 1993.

  To help cities meet this requirement, a model ordinance was developed to complement existing efforts by the South Coast Air Quality Management District. The ordinance requires "TDM-friendly" design standards for new non-residential construction. Local jurisdictions must also provide transit operators the opportunity to comment on the impacts of new development through the California Environmental Quality Act (CEQA) process.

- **Land Use.** When making land use decisions, the CMP requires local jurisdictions to consider the impact of new development on the regional transportation system. Transportation Impact Analysis (TIA) guidelines incorporated in the CMP, provide a common measure countywide for assessing these regional impacts. CMP Transportation Impact Analysis is required only for projects preparing an Environmental Impact Report (EIR). This approach effectively coordinates CMP requirements with the California Environmental Quality Act (CEQA), thereby minimizing additional analysis requirements. The ultimate decision on addressing congestion concerns identified in an EIR remains the responsibility of the local jurisdiction. Local

jurisdictions were required to adopt the this CMP land use analysis program by April 1, 1993.

- **Capital Improvement Program.** In order to qualify for funds through the State Transportation Improvement Program (STIP), projects must first demonstrate a benefit to the CMP highway system. The Capital Improvement Program for the 1992 CMP identifies those State funded projects that are already included in the 1992 STIP. Statute requires that these projects be included in the CMP in order to remain eligible for State funding.

PROPOSED 1993 CMP UPDATE:

The 1993 CMP Update includes the following proposed modifications:

1. **1993 Highway and Transit Monitoring Data**

   The 1992 CMP produced the first consistent, multi-jurisdictional analysis of traffic congestion throughout the County. The 1993 CMP will provide comparable data, and identify changes in congestion levels over the past year. Transit frequency and routing data are also being compiled, through information provided by transit operators as part of the Short Range Transit Plan.

2. **Addition to the CMP Highway and Roadway System**

   The 1992 CMP established a mechanism for adding routes through the biennial CMP update. In January 1993, local jurisdictions were asked to nominate routes that they would like considered for addition to the CMP system. In response to that request, routes recommended from various jurisdictions were considered.

   The CMP Policy Advisory Committee (PAC) discussed this issue in great detail in March and April of 1992. As a result of this discussion, the PAC recommended that La Cienega Boulevard between the Santa Monica Freeway (I-10) and the San Diego Freeway (I-405) be added to the system.

3. **Refinement of the Land Use Analysis Program**

   The 1992 CMP established guidelines for analyzing the impacts of new development on the regional transportation system, integrated through existing California Environmental Quality Act (CEQA) requirements. These guidelines

included technical procedures for analyzing the impacts of individual development projects at CMP intersections and freeway segments.

Through implementation, CMP staff has found that a brief supplement to these guidelines would allow for the analysis of longer range and more generalized development programs such as local general plans and community plans. By allowing the analysis of these plans to focus on CMP street segment analysis rather than intersections, comparable evaluation of regional impacts and mitigation measures can be provided. This supplement will improve effectiveness of the land use analysis program at capturing cumulative development impacts, while permitting more generalized technical evaluation appropriate to the nature of general plans and minimizing administrative costs.

4. **Update of the Capital Improvement Program**

State programming statutes require that projects competing for state Flexible Congestion Relief (FCR) funds be included in the CMP, and that projects competing for Traffic System Management (TSM) funds be consistent with the CMP. 1992 CMP monitoring data and analysis have been integrated into the MTA's ongoing Multi-Year Call for Projects, and will be used in evaluating the regional significance of project applications. Once project selection is complete, those projects which are proposed for State funding will be incorporated into the 1993 CMP Capital Improvement Program.

5. **Deficiency Plan Procedures:**

Statute requires that local jurisdictions prepare deficiency plans when portions of the CMP highway system deteriorate to LOS F, or worsen within LOS F. The purpose of the deficiency plan is to implement strategies that either fully mitigate congestion or alternatively, provide measurable improvement to congestion and air quality. The contents of a deficiency plan are specified in statute, as are guidelines for the determination of deficiencies and the agencies that must be consulted.

In March 1992, a workshop was held to discuss CMP deficiency plan requirements. In response to previous Commission direction, staff reported on various CMP deficiency plan alternatives. Based on extensive testimony, the Commission directed staff to develop a coordinated, countywide approach to meet deficiency plan responsibilities. The countywide approach described below has now been developed and is being proposed for addition to the CMP as part of the 1993 update. It includes:

- Identification of the magnitude of deficiencies anticipated to occur on the CMP highway system by the year 2010, with completion of transportation improvements expected to be funded during this time period. CMP model runs indicate that roughly 15% of the trips generated by growth within Los Angeles County through the year 2010 will contribute to deficiencies on the CMP highway system. This 15% is new trips is equivalent to 3% of all trips in the year 2010.

- A program for assigning deficiency points to jurisdictions based on local land use decisions and their contribution to deficiencies on the CMP highway system. Local jurisdictions will annually track and report on new development activity, in order to establish its congestion mitigation goal.

- The local jurisdiction implements mitigation measures by selecting from a toolbox of capital, demand reducing, and land use strategies. A local jurisdiction is responsible for balancing its congestion mitigation goal with commensurate mitigation strategies. Mitigation points will be based on the trip reduction value of various mitigation strategies. Both the impact and mitigation point systems will be refined over time.

- Local jurisdictions claim credits for mitigation strategies implemented after January 1, 1990. The actions for which credit can be claimed and the amount of credit is determined by the CMP mitigation toolbox and value system. If a local jurisdiction contributes partial funding to a mitigation project, the credit is based on the mitigation value of the project and the proportion contributed by the jurisdiction. Local jurisdictions report the *implementation* of mitigation actions. The MTA is responsible for assessing the *effectiveness* of mitigation actions, not local jurisdictions.

- Since mitigation goals are determined annually for each jurisdiction based on total new development activity, there is no required linkage of mitigation to project-by-project development approvals. A jurisdiction may, in fact, choose to implement mitigation actions which affect existing activity rather than new development. Each jurisdiction has the flexibility to choose mitigation measures - multi-jurisdictional, citywide, subarea, or project-specific - it deems most appropriate.

- Funding for implementation of mitigation actions can be from any source programmed by the local jurisdiction. Projects funded through MTA discretionary sources, such as State Flexible Congestion Relief (FCR) funds, DO NOT count toward meeting local jurisdiction deficiency plan obligations.

This avoids double counting of mitigation actions that reduce the countywide congestion gap.

- As a countywide program, all local jurisdictions must participate in the deficiency plan process, regardless of the number of CMP intersections or congestion levels specifically within their geographic limits. This required participation recognizes the complexity of Los Angeles County travel patterns and related interjurisdictional impacts. Local CMP conformance is determined by participation in the program, defined by: (1) tracking new development activity, (2) selecting commensurate mitigation strategies, and (3) implementing selected mitigation strategies. First-year CMP conformance requirements (highway and transit monitoring, TDM ordinance, and land use analysis) will also continue.

Environmental Review of the 1993 CMP

According to Section 21094 of CEQA, where a prior environmental impact report has been prepared and certified for a program, plan, policy, or ordinance, the lead agency for a later project shall examine significant effects of the later project upon the environment by using a tiered environmental impact report, except that the report on the later project need not examine those effects which the lead agency determines were either (i) mitigated or avoided pursuant to subdivision (a) of Section 21081 of CEQA as a result of the prior environmental impact report, or (2) examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

The EIR prepared for the 1992 CMP, and the EIR prepared for the Southern California Association of Governments (SCAG) 1989 Regional Mobility Plan (RMP), shall be considered the "first tier" of the CEQA process for the 1993 CMP. The 1993 CMP EIR shall constitute the second tier and shall be limited to examining impacts and mitigation measures which were not evaluated in the 1992 CMP EIR or the 1989 RMP EIR as provided by State CEQA Guidelines Section 15152.

The purpose of an Initial Study for a tiered project or program is to analyze whether the later project or program may cause significant effects on the environment that were not examined in the prior Environmental Impact Report(s). That is the purpose of this Initial Study. Section II of this Initial Study contains a checklist assessment of the 1993 CMP's potential to create additional impacts not previously analyzed. The basis for the checklist judgements are explained in Section III of this Initial Study.

II. ENVIRONMENTAL IMPACTS

May the 1993 CMP result in significant effects on the environment that were not examined in the RMP EIR or the 1992 CMP EIR? (Explanations of all "yes" and "maybe" answers are provided in Section III.)

		Yes	*Maybe*	*No*
I. EARTH. *Will the proposal result in:*				
a)	Unstable earth conditions or changes in geologic substructures?	☐	☐	☒
b)	Disruptions, displacements, compaction, or overcovering of the soil?	☐	☐	☒
c)	Change in topography or ground surface relief features?	☐	☐	☒
d)	The destruction, covering, or modification of any unique geologic or physical features?	☐	☐	☒
e)	Any increase in wind or water erosion of soils, either on or off the site?	☐	☐	☒
f)	Changes in deposition or erosion of beachsands, 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)	Exposure of people or property to geologic hazards, such as earthquakes, landslides, mudslides, ground failure, or similar hazards?	☐	☐	☒
II. AIR. *Will the proposal result in:*				
a)	Substantial air emissions or deterioration of ambient air quality?	☐	☒	☐
b)	The creation of objectionable odors?	☐	☐	☒
c)	Alteration of air movement, moisture, or temperature, or any change in climate, either locally, or regionally?	☐	☐	☒

		Yes	*Maybe*	*No*
III. WATER. *Will the proposal result in:*				
a)	Changes in currents, or the course of direction of water movements, in either marine or freshwaters?	☐	☐	☒
b)	Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?	☐	☐	☒
c)	Alterations to the course or flow of flood waters?	☐	☐	☒
d)	Changes in the amount of surface water in any water body?	☐	☐	☒
e)	Discharge into surface waters, or in any alteration of surface water quality, including, but not limited to, temperature, dissolved oxygen or turbidity?	☐	☐	☒
f)	Alteration of the direction or rate of flow of ground waters?	☐	☐	☒
g)	Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?	☐	☐	☒
h)	Substantial reduction in the amount of water otherwise available for public water supplies?	☐	☐	☒
i)	Exposure of people or property to water related hazards such as flooding or tidal waves?	☐	☐	☒
IV. PLANT LIFE. *Will the proposal result in:*				
a)	Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, and aquatic plants)?	☐	☐	☒
b)	Reduction of the numbers of any unique, rare, or endangered species of plants?	☐	☐	☒
c)	Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?	☐	☐	☒
d)	Reduction in acreage of any agricultural crop?	☐	☐	☒

		Yes	Maybe	No
V. ANIMAL LIFE. *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)?	☐	☐	☒
b)	Reduction of the numbers of any unique, rare, or endangered species or animals?	☐	☐	☒
c)	Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?	☐	☐	☒
d)	Deterioration to existing fish or wildlife habitat?	☐	☐	☒
VI. NOISE. *Will the proposal result in:*				
a)	Increases in existing noise levels?	☐	☐	☒
b)	Exposure of people to severe noise levels?	☐	☐	☒
VII. LIGHT AND GLARE. *Will the proposal:*				
a)	Produce new light or glare?	☐	☐	☒
VIII. LAND USE. *Will the proposal result in:*				
a)	Substantial alteration of the present or planned land use of an area?	☐	☒	☐
IX. NATURAL RESOURCES. *Will the proposal result in:*				
a)	Increase in the rate of use of any natural resources?	☐	☐	☒
b)	Substantial depletion of any non-renewable natural resource?	☐	☐	☒

		Yes	*Maybe*	*No*
X. RISK OF UPSET. *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 conditions?	☐	☐	☒
b)	Possible interference with an emergency response plan or an emergency evacuation plan?	☐	☐	☒
XI. POPULATION. *Will the proposal:*				
a)	Alter the location, distribution, density, or growth rate of the human population of an area?	☐	☒	☐
XII. HOUSING. *Will the proposal:*				
a)	Affect existing housing, or create a demand for additional housing?	☐	☒	☐
XIII. TRANSPORTATION/CIRCULATION. *Will the proposal result in:*				
a)	Generation of substantial additional vehicular movement?	☐	☒	☐
b)	Effects on existing parking facilities, or demand for new parking?	☐	☒	☐
c)	Substantial impact upon existing transportation systems?	☐	☒	☐
d)	Alterations to present patterns of circulation or movement of people and/or goods?	☐	☒	☐
e)	Alterations to waterborne, rail, or air traffic?	☐	☒	☐
f)	Increase in traffic hazards to motor vehicles, bicyclists, or pedestrians?	☐	☐	☒

		Yes	Maybe	No
XIV. PUBLIC SERVICES. *Will the proposal have an effect upon, or result in a need or for a new or altered governmental services in any of the following areas:*				
a)	Fire protection?	☐	☒	☐
b)	Police protection?	☐	☒	☐
c)	Schools?	☐	☒	☐
d)	Parks or other recreational facilities?	☐	☒	☐
e)	Maintenance of public facilities, including roads?	☐	☒	☐
f)	Other governmental services?	☐	☒	☐
XV. ENERGY. *Will the proposal result in:*				
a)	Use of substantial amounts of fuel and energy?	☐	☒	☐
b)	Substantial increase in demand upon existing sources of energy, or require the development of new sources of energy?	☐	☒	☐

		Yes	Maybe	No
XVI. UTILITIES AND SERVICE SYSTEMS. *Will the proposal result in a need for new systems, or substantial alterations to the following utilities:*				
a)	Power or natural gas?	☐	☐	☒
b)	Communications systems?	☐	☐	☒
c)	Water?	☐	☐	☒
d)	Sewer or septic tanks?	☐	☐	☒
e)	Storm water drainage?	☐	☐	☒
f)	Solid waste and disposal?	☐	☐	☒
XVII. HUMAN HEALTH. *Will the proposal result in:*				
a)	Creation of any health hazard or potential health hazard (excluding mental health)?	☐	☐	☒
b)	Exposure of people to potential health hazards?	☐	☐	☒
XVIII. AESTHETICS. *Will the proposal result in:*				
a)	The obstruction of any scenic vista or view open to the public?	☐	☐	☒
b)	The creation of an aesthetically offensive site open to public view?	☐	☐	☒
XIX. RECREATION. *Will the proposal result in:*				
a)	Impact upon the quality or quantity of existing recreational opportunities?	☐	☐	☒

		Yes	*Maybe*	*No*
XX. CULTURAL RESOURCES. *Will the proposal:*				
a)	Result in the alteration of or the destruction of a prehistoric or historic archaeological site?	☐	☐	☒
b)	Result in adverse physical or aesthetic effects to a prehistoric or historic building, structure, or object?	☐	☐	☒
c)	Have the potential to cause a physical change which would affect unique ethnic cultural values?	☐	☐	☒
d)	Restrict existing religious or sacred uses within the potential impact area?	☐	☐	☒
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a)	**Potential to degrade:** 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?	☐	☐	☒
b)	**Short-term:** 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. Long term impacts will endure well into the future.)	☐	☐	☒
c)	**Cumulative:** 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 on the total of those impacts on the environment is significant.)	☐	☒	☐
d)	**Substantial adverse:** Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒

III. DISCUSSION OF ENVIRONMENTAL EVALUATION (Narrative description environmental impacts).

1. Earth

a.-g. No. The 1992 CMP EIR addressed earth related impacts. It identified the following direct and indirect effects of the CMP:

Direct Effects: Construction of Capital Improvement Program (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.

This would be true as well for Deficiency Plan related mitigation projects or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

E. 1 The MTA 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 MTA 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.
- 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; and
- demonstrate that all significant geotechnical factors have been mitigated in a manner consistent with the provisions of sound engineering practice and applicable local ordinances.

The 1993 CMP Deficiency Plan mitigation projects and projects included in any CIP update would have the same impacts as those described in the 1992 EIR. The 1992 discussion is adequate to address these impacts and no additional discussion of these impacts is required in the 1993 CMP EIR.

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 of the 1992 CMP EIR, where it is concluded that the potential of the 1992 CMP to foster urban deconcentration is negligible.

Also discussed in the 1992 CMP EIR is the possibility 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.

As discussed under Item 8 of this Initial Study, the addition of the Deficiency Plan requirement may result in changes in land use. However, given the region's seismic activity, the prevalence of faults, existing building code requirements, and statutory requirements for assessing seismic risk as part of the development permitting, it is not anticipated that a general redistribution of population, if any, would have a significant effect of seismic risk.

Mitigation Measure C.3, included in the 1992 CMP EIR, provides for monitoring for changes from the anticipated regional land use pattern.

The 1992 CMP discussion of earth impacts is sufficient to address potential 1993 CMP earth impacts. No additional discussion of these impacts is required in the 1993 CMP EIR.

2. Air

a. **Maybe**. The 1992 CMP EIR included a qualitative discussion of potential air quality impacts. That document identified the following impacts and included the following mitigation measures:

Direct Impact: The 1992 CMP is consistent with the AQMP and would help to improve regional air quality in the County.

The 1993 CMP Deficiency Plan component would add additional capital improvement and TDM related projects to the list of planned improvements. Although these projects are consistent with the goals of the AQMP the 1993 CMP with the deficiency plan component may result in significant positive or negative impacts not previously addressed. The 1993 CMP EIR will contain such an analysis.

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 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 a new source 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 the roadway.

- 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.

This would be true as well for Deficiency Plan mitigation projects or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

In addition to Mitigation Measure B.1 , the following mitigation measures would partially mitigate direct impacts associated with CMP CIP projects:

C.1 The MTA 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 MTA 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 emissions thresholds, as well as to California Ambient Air Quality Standards (CAAQS) ;

- Consistency with the Air Quality Management Plan; and

- 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 MTA 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.

The 1993 CMP capital projects and mitigation projects included in the Deficiency Plan would have the same impacts as those described in the 1992 EIR. The 1992 EIR discussion is adequate to address these impacts. No additional discussion of these impacts is required in the 1993 CMP EIR.

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 of the 1992 CMP EIR - Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration is negligible.

As discussed under Item 8 of this Initial Study, the addition of the Deficiency Plan requirement may result in changes in land use which will be assessed in the 1993 CMP EIR. The following mitigation was included in the 1992 CMP EIR and was designed to monitor for such changes and to trigger additional analysis if they occur:

C.3 The MTA, 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 would be sufficient to address this potential indirect effect of the 1993 CMP as long as significant unmitigatible land use redistribution impacts are not found to result from the 1993 CMP.

The 1992 CMP EIR also discussed the fact that 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. The following mitigation was included in the 1992 CMP EIR for this potential indirect impact:

C.4 The MTA 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.

This mitigation would be sufficient to address this potential impact of the 1993 CMP. No additional discussion of these impacts is required in the 1993 CMP EIR.

b.-c. **No.** The 1993 CMP does not contain any elements that would create objectionable odors, or alter air movement or climate.

3. Water

a.-i. **No.** The 1992 CMP EIR included a qualitative discussion of potential water related impacts. That document identified the following impacts and included the following mitigation measures:

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-term adverse effect on nearby surface water bodies during construction of CIP related projects. These effects would include increased sedimentation endangered 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.

This would be true as well for Deficiency Plan mitigation projects or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

F. 1 The MTA 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 MTA 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 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 preconstruction condition, including the reintroduction of all uncontaminated soil and the replacement of all native vegetation. In the coastal zone, coastal zone planning and management programs to reduce adverse impacts to coastal water quality and preserve or improve areas of special water quality significance such as bays and estuaries.

- 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.

In addition, Mitigation Measure A.3 included in the 1992 CMP EIR would reduce long-term water quality impacts associated with CIP project operation.

With implementation of the mitigation measures, program level 1992 CMP and 1993 CMP 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 as part of subsequent environmental review.

The 1993 CMP capital projects and mitigation projects included in the Deficiency Plan would have the same impacts to those described in the 1992 EIR. The 1992 discussion is adequate to address these impacts. No additional discussion of these impacts is required in the 1993 CMP EIR.

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. 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 interdependency effects of deconcentration would increase the needed for and restrictiveness of large-scale water conservation programs.

Mitigation Measure C.3 included in the 1992 CMP EIR would reduce the indirect impacts of the 1992 CMP and 1993 CMP on beneficial uses and the water supply/demand balance.

No additional impacts are expected to result from the 1993 CMP. The discussion of potential CMP related impacts contained in the 1992 CMP EIR is sufficient to address potential 1993 CMP impacts.

4. Plant Life

a.-d. No. The 1992 CMP EIR included a qualitative discussion of potential biological resource impacts of the CMP. That document identified the following impacts and included the following mitigation measures:

Direct Impacts: To the extent that the CMP is successful in maintaining LOS in the vicinity of Significant Ecological Areas (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.

This would be true as well for the 1993 CMP for mitigation projects included in the Deficiency Plan or any CIP updates. The following mitigation measure was included in the 1992 CMP EIR for these potential impacts.

G.1 The MTA 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 MTA 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 CMP capital improvement project located in the vicinity of an SEA, or 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.

- 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 MTA 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 rights-of-way acquired for proposed transportation improvements.

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 as part of subsequent project level environmental review.

The 1993 CMP capital projects and mitigation projects included in the Deficiency Plan would have the same impacts to those described in the 1992 EIR. The 1992 discussion is adequate to address these impacts. No additional discussion of these impacts is required in the 1993 CMP EIR.

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.

Mitigation Measure C.3 included in the 1992 CMP EIR would reduce the indirect impacts of the CMP on biological resources.

No additional impacts are expected to result from the 1993 CMP. The discussion of potential CMP related impacts contained in the 1992 CMP EIR is sufficient to address potential 1993 CMP impacts.

5. Animal Life

a.-d. **No**. See discussion under Item 4 above.

6. Noise

a.-b. **No**. The 1992 CMP EIR included a qualitative discussion of potential noise impacts of the CMP. That document identified the following impacts and included the following mitigation measures.

Direct Effect - Noise from the construction of CIP projects may be disruptive. 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).

- 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.

This would be true as well for mitigation projects included in the Deficiency Plan or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

D. 1 The MTA 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 MTA 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 (FHWA FHMP 773, State Office of Noise Control, local noise ordinances and general plan noise elements, 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.

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. This would occur as part of subsequent project specific environmental review.

The 1993 CMP capital projects and mitigation projects included in the Deficiency Plan would have the same impacts to those described in the 1992 EIR.

Indirect Effects: Should implementation of the CMP result in increased urban concentration, 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 of the 1992 CMP EIR - 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 Measure C.3 included in the 1992 CMP EIR addresses indirect noise impacts.

No additional impacts are expected to result from the 1993 CMP as long as significant unmitigatable land use changes are not created by the addition of the Deficiency Plan component.

The Deficiency Plan process would result in additional capital, land use, and TDM type mitigations aimed at mitigating deficiencies. The intent of the 1992 and 1993 CMPs is to maintain the level of service standards on the CMP highway system. In general, a doubling or halving of traffic on roadways is required to create noticeable changes in noise levels. The 1993 CMP will not result in this magnitude of change when compared to traffic levels under the 1992 CMP, except potentially in the vicinity of capital improvement projects which would be subject to project specific level environmental review. The 1992 CMP EIR discussion is therefore adequate to address potential 1993 CMP noise impacts. No additional discussion of these impacts is required in the 1993 CMP EIR.

7. Light and Glare

No. As explained in the Initial Study for the 1992 CMP EIR, 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 would be identified, as needed to mitigate significant project impacts, as part of any necessary subsequent project level environmental review. Therefore, light and glare impacts were not addressed in the 1992 CMP EIR. This will be true for the 1993 CMP as well.

8. Land Use

Maybe. The 1992 CMP EIR included an assessment of the 1992 program's potential to create land use changes. It was concluded that the potential for the 1992 CMP to affect land use was limited and the following impacts and mitigations were described for the 1992 CMP:

Direct Impact: Individual CIP projects may result in localized changes in land use.

This direct and indirect impact would be true as well for Deficiency Plan related capital improvement projects, land use mitigation strategies, or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

A. 1 The MTA 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.

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.

This would be true as well for Deficiency Plan related mitigation projects or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

A.2 The MTA shall participate in on-going forums, regarding interjurisdictional impacts including land use issues and impact analysis procedures.

Indirect Impacts: Increasing system capacity may encourage additional trips (latent demand) on the system, by reducing the costs (time and stress) associated with

trip-making. This would be true as well for Deficiency Plan related capital improvement projects, land use mitigation strategies, or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

A. 3 The MTA 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.

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 (see Table 5) Class 2 and 3 projects present the greatest potential for disruption.

This would be true as well for mitigation projects included in the Deficiency Plan or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

A. 4 The MTA shall review project-level EIRs for CMP CIP projects. The review shall be intended to ensure that as part of the 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 MTA may comment on the adequacy of the analysis and mitigations.

Indirect Impacts: 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 is a beneficial impact of both the 1992 and 1993 CMPs.

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. The following mitigation was included in the 1992 CMP EIR for these impacts:

A.5 The MTA shall explore with the cities, the desirability of including mechanisms in the CMP for encouraging the creation of increased density in targeted center 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.

This would be true as well of the 1993 CMP. No further analysis of these issues is required.

The key change in the 1993 CMP which could potentially impact land use is the addition of the Deficiency Plan requirement. The 1992 CMP relied on compliance with CEQA to identify and deal with potential development related impacts on the regional system. CEQA allows for the permitting of projects which would create significant unmitigatable impacts as long as the proper Findings and Statement of Overriding Considerations are made. The addition of the Deficiency Plan component may create greater mitigation requirements and additional costs for development, which could potentially result in changes in land use locational decisions. Potential impacts associated with the Deficiency Plan component of the 1993 CMP include: (1) the potential to foster development patterns inconsistent with local and regional plans within the County; (2) the potential to alter the geographic distribution of current and projected development patterns within the County; and (3) the potential to retard or stimulate the assumed rate if growth either based on historical trends or on the levels of development anticipated in local and regional plans. The potential for the 1993 CMP to result in these three types of impacts will be assessed in the EIR for the program.

9. Natural Resources

a.-b. **No.** As explained in the Initial Study for the 1992 CMP, Natural Resource impacts were not addressed in the RMP EIR. Aggregate Resource impacts are addressed in the EIR for the Growth Management Plan (GMP), which is also incorporated herein by reference. 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 assessed under the discussion of energy. Thus no further discussion of these types of impacts is required in the 1993 CMP EIR.

10. Risk of Upset

a.-b. **No.** As explained in the Initial Study for the 1992 CMP, 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. This is addressed as part of the traffic discussion in the 1992 CMP EIR. Implementation of the CMP should improve overall emergency response time by maintaining mobility on the region's highway system. Response time impacts are discussed in the Public Services section of the 1992 CMP EIR and this Initial Study.

No increased risk of explosion or release of hazardous substances is anticipated as a result of the 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 risk of upset, the potential will be assessed as part of subsequent environmental review. Thus no further discussion of these types of impacts is required in the 1993 CMP EIR.

11. Population

Maybe. See discussion under Item 8, Land Use, above.

12. Housing

Maybe. See discussion under Item 8, Land Use, above.

13. Transportation/Circulation

a.-e. Maybe. The 1992 CMP EIR included a qualitative discussion of the potential transportation/circulation related impacts. That document identified the following impacts and included the following mitigation measures:

Direct Impacts: 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. This is true of the 1993 CMP as well, although the 1993 CMP consistency with the RMP has not been formally assessed. The 1993 CMP EIR will include a discussion of the 1993 CMPs consistency with the RMP.

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.

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. These potential for these impacts to occur would be addressed as part of subsequent project specific level environmental review.

This would be true as well for Deficiency Plan related capital improvement projects or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

Mitigation Measure A.4 included in the 1992 CMP EIR would mitigate the direct effects of the CIP element of the CMP.

B. 1 The MTA 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.

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. This is true as well of 1993 CMP CIP and Deficiency Plan projects.

Direct Impact: The CMP will help to maintain LOS. This is a beneficial impact which would be true as well of the 1993 CMP. However, the Deficiency Plan component of 1993 CMP will result in the implementation of additional land use, TDM and capital improvement strategies. The congestion and system impacts of the Deficiency Plan Component have not previously been formally assessed. The 1993 CMP EIR will therefore include an assessment of the potential congestion and transportation system impacts of the Deficiency Plan component.

Indirect Effect: Should implementation of the CMP result in increased urban deconcentration or concentration or expansion of development in outlying areas, 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 of the 1992 CMP EIR, Impact Overview, where it is concluded that the potential of the CMP to foster urban deconcentration if negligible.

The 1993 CMP could potentially also have these same impacts. The following mitigation was included in the 1992 CMP EIR for these impacts:

Mitigation Measures A.1 - A.3 included in the 1992 CMP EIR would mitigate the indirect effects of the CIP element of the CMP; mitigation measures A.1 - A.3 and mitigation B.1 from the 1992 CMP EIR would mitigate the indirect effects of the CMP Highway and Roadway System Element.

No additional impacts of this kind are expected to result from the 1993 CMP as long as significant unmitigatable land use changes are not created by the addition of the Deficiency Plan component.

Direct Impact: The Highway and Transit Elements would provide monitoring information to assist in planning. This is a beneficial impact of both the 1992 and 1993 CMPs.

f. **No.** The 1993 CMP does not contain any element that would increase traffic hazards to motor vehicles, bicyclists, or pedestrians.

14. Public Services

a.-f. **Maybe**. The 1992 CMP EIR included a qualitative discussion of the potential public service related impacts. That document identified the following impacts and included the following mitigation measures:

Direct Effects: The construction of individual CIP projects may temporarily slow police and fire department responses and disrupt access.

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.

This would be true as well for Deficiency Plan related capital improvement projects or any CIP updates. The following mitigation was included in the 1992 CMP EIR for these impacts:

I.1 The MTA 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 MTA 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.

- 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.

I.2 The MTA 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 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.

No additional impacts are expected to result from the 1993 CMP. The discussion of potential CMP related impacts contained in the 1992 CMP EIR is sufficient to address these potential 1993 CMP impacts.

Direct Effect: Local government's compliance with the CMP could result in the diversion of local government personnel and revenues.

This would be true as well for the 1993 CMP. The following mitigation was included in the 1992 CMP EIR for these impacts:

I.3 The MTA shall work with local jurisdictions to investigate a county-wide process to deal with future year CMP implementation.

I.4 The MTA shall continue to work with public and private interests regarding CMP requirements to minimize adverse public/private cost impacts associated with the CMP.

The level of detail of the discussion in the 1992 CMP EIR was based on the level of refinement of the description of the program elements. The new Deficiency Plan component of the 1993 CMP addresses mitigation measure I.3. However, the potential of the proposed approach to: (1) result in a diversion of local jurisdictional resources away from the provision of other services to a degree which significantly impacts the provision of public services; and, (2) the administrative implementation impacts has not been assessed. This will be done in the 1993 CMP EIR.

15. Energy

a.-b. **Maybe**. The 1993 CMP will result in the construction of additional capital improvement projects and will result in a greater level of mobility on the regional system than the 1992 CMP. This will result in the expenditure of additional construction energy and will affect fuel use in the County. The 1993 CMP will assess these potential energy impacts.

16. Utilities and Service Systems

a.-f. **No**. As explained in the Initial Study for the 1992 CMP EIR, 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. As long as the CMP does not result in a land use future which is significantly different than the adopted regional forecast, 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.

For these reasons no utilities impact discussion was included in the 1992 CMP, and no discussion is required in the 1993 CMP EIR.

17. Human Health

a.-b. **No.** As explained in the Initial Study for the 1992 CMP EIR, 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 are discussed under those issue areas. 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 of those projects.

For these reasons, no human health section will be included in the 1993 CMP EIR.

18. Aesthetics

a.-b. **No.** As explained in the Initial Study for the 1992 CMP EIR, 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 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. These mitigations are incorporated by reference in the CMP EIR since the CMP EIR is tiered off the RMP EIR. 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 aesthetic impacts, the potential will be assessed as part of the subsequent environmental review of those projects.

For these reasons, no aesthetics section will be included in the 1993 CMP EIR.

19. Recreation

a. **No.** Recreation impacts are addressed as part of the Public Service discussion in the 1992 CMP EIR. As explained under 14 above, no additional impacts are anticipated to result from the 1993 CMP, and no further analysis is required.

20. Cultural Resources

a.-d. **No.** The 1992 CMP EIR included a qualitative discussion of the potential cultural resource related impacts. The 1992 CMP EIR identified the following impacts and included the following mitigation measures:

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 area, archaeological and paleontological resources are uncovered during the construction phase of a project.

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 LOS standards. This could potentially lead to impacts on historic structures as part of CIP projects.

This would be true as well for mitigation projects included in the Deficiency Plan, any CIP updates, or any network additions included in the 1993 CMP. The following mitigation was included in the 1992 CMP EIR for these impacts:

H.1 The MTA 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 MTA 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:

- 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 facility.

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

No additional impacts are expected to result from the 1993 CMP. The discussion of these potential CMP related impacts contained in the 1992 CMP EIR is sufficient to address potential 1993 CMP impacts.

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 resource in these areas.

Mitigation Measure C.3 included in the 1992 CMP EIR would reduce the indirect impacts of the CMP on historic resources.

No additional impacts are expected to result from the 1993 CMP. The discussion of potential CMP related impacts contained in the 1992 CMP EIR is sufficient to address potential 1993 CMP impacts.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

a-b,d. **No.** The 1993 CMP does not contain any elements that would have the potential to degrade the quality of the environment, cause short term environmental goals to the disadvantage of long-term goals, or cause substantial adverse effects on human beings.

c. **Maybe.** The 1993 CMP will propose modifications to the adopted 1992 CMP including modifications to the highway and transit monitoring data, additions to the CMP highway system, refinement of the land use analysis program and, update of the Capital Improvement Program. The 1993 CMP will also incorporate a Deficiency Plan component whose purpose is to implement countywide mitigation strategies that either fully mitigate congestion, or alternatively, provide measurable improvement to congestion and air quality. Although the impact of individual CMP CIP or deficiency plan mitigation programs or projects alone may be small, the programs or projects as a whole may pose the potential to create significant positive or negative air quality, land use, population, housing, transportation, public service, or energy impacts. As noted in the checklist discussion of specific impact categories, the 1993 EIR will address the potential of the 1993 CMP to create significant environmental impacts in these issue areas.

As detailed in the checklist, no significant program level impacts on earth, water, plant life, animal life, noise, light and glare, natural resources, risk of upset, energy, utilities and service systems, human health, aesthetics, recreation and cultural resources are identified. The CMP CIP projects and projects included in the Deficiency Plan Mitigation Menu would have the same impacts as those described in the 1992 EIR. The 1992 CMP EIR contained qualitative discussions of these impacts, and the related adopted mitigation measures adopted for direct and indirect impacts, are sufficient to address potential 1993 CMP impacts.

IV. ENVIRONMENTAL DETERMINATION

On the basis of this initial evaluation:

I find that 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 attached sheets have been added to the project. A 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. X

Name: Kendra Morries
Title: Land Use Project Manager
Congestion Management Program

May 21, 1993
Date

Kendra Morries
Signature

For the Los Angeles County Metropolitan Transportation Authority

CITY OF CARSON

June 10, 1993

Ms. Kendra Morries
Land Use Project Manager
Congestion Management Program
LACMTA
818 W. Seventh St.
Los Angeles, CA 90017

Dear Ms. Morries:

The City of Carson looks forward to the opportunity to review and comment on the draft EIR for the 1993 Congestion Management Program for Los Angeles County. The City of Carson is concerned about the economic impact of the program on cities for both the administration of the program and the funding of mitigation measures.

The cities are being required to mitigate all trips (with the exception of specified exempted trips) whether or not the project must undergo discretionary review. The roads within the City of Carson which are on the CMP system are the freeways (I-405, I-91 and I-110) and Alameda Street. There are limited improvements which the City can make to the freeway system and since the freeways are under the jurisdiction of Caltrans all proposed improvements must be approved by the State agency leaving the city few options and little control over the improvements.

The Alameda Corridor is a major improvement project on the only CMP designated street within the City. Since this improvement will be financed by federal and state funds, Carson would receive no credit for any improvements. The City of Carson has no existing or proposed mass transit stations, therefore the city can not get credit for improvements and/or development at stations. The City of Carson will be limited in the number of mitigation measures that could be implemented. If the cities can not economically enact the program, the impact on the regional system will be significant. An economic study should be completed which determines at what point the cities can not afford to participate in the CMP program.

Please forward a copy of the Draft EIR for our review and comment as soon as it is available.

Sincerely,

Patrick Brown,
Community Development Director

CK

South Coast
AIR QUALITY MANAGEMENT DISTRICT
21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2000

June 10, 1993

Ms. Kendra Morries
Los Angeles County Transportation Authority
818 West 7th Street - MS2200
Los Angeles, CA 90017

Dear Ms. Morries:

Subject: **Notice of Preparation of a Draft Environmental Impact Report for the 1993 Congestion Management Program for Los Angeles County**

SCAQMD# LAC930604-02

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 1993 Congestion Management Program for Los Angeles County. 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.

For additional information please refer to SCAQMD's CEQA Air Quality Handbook, 1993 Edition 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 (909) 396-3055. If you have questions regarding the review of the CMP or deficiency plan, please call Alene Taber at (909) 396-3057.

Sincerely,

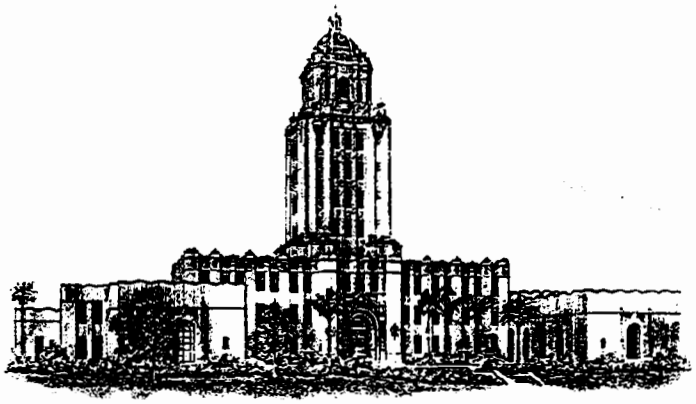
Connie Day

Connie Day
Program Supervisor
Local Government - CEQA

CAD:
(cmpnop)

DEPARTMENT OF TRANSPORTATION
(310) 285-2551
FAX: (310) 273-0972

455 N. Rexford Drive
Beverly Hills, CA 90210-4817



CITY OF BEVERLY HILLS

June 14, 1993

Ms. Kendra Morries
Land Use Project Manager/CMP
Los Angeles County MTA
818 West Seventh Street, Suite 300
Los Angeles, CA 90017

Dear Ms. Morries Kendra,

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report and Initial Study for the 1993 Congestion Management Program for Los Angeles County.

We have reviewed the Notice of Preparation and have no comments at this time. We appreciate the cooperative nature in which the CMP has been prepared and look forward to working with you in the future.

Sincerely,

Anton Dahlerbruch
Executive Assistant

cc: Maria Rychlicki, Director

City of South Gate

8650 CALIFORNIA AVENUE • SOUTH GATE, CA 90280-3075 • (213) 563-9529
FAX (213) 567-0725

DEPARTMENT OF COMMUNITY DEVELOPMENT
ANDREW G. PASMANT
DIRECTOR

June 16, 1993

Ms. Kendra Morries
Land Use Project Manager, Congestion Management Program
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY
818 West Seventh Street, Suite 300
Los Angeles, CA 90017

SUBJECT: 1993 CMP - REVIEW OF NOTICE OF PREPARATION AND INITIAL STUDY

Dear Ms. Morries:

On behalf of the City of South Gate, I would like to thank you for providing us with the opportunity to review and comment on the Notice of Preparation and Initial Study prepared by the Los Angeles County Metropolitan Transportation Authority (MTA) for the 1993 Congestion Management Program for Los Angeles County.

At this time, we do not have any comments with respect to the initial study. We would appreciate the continued receipt of further environmental documentation during the processing of the Draft and Final Environmental Impact Reports once they become available. Should you have any further questions, please do not hesitate to contact me directly at (213) 563-9562.

Sincerely,

ANDREW G. PASMANT
DIRECTOR OF COMMUNITY DEVELOPMENT

By: _____
Oliver Mujica, Associate Planner

City of El Segundo

DEPARTMENT OF PLANNING
AND BUILDING SAFETY
• City Hall • 350 Main Street • El Segundo, California 90245-0989
• (310) 322-4670 • FAX: (310) 322-4167

HYRUM B. FEDJE
Director

June 15, 1993

Ms. Kendra Morries, Land Use Project Manager
Congestion Management Program
Los Angeles County Metropolitan Transportation Authority
818 West Seventh Street, Suite 1100
Los Angeles, CA 90017

RE: Notice of Preparation of an Environmental Impact Report (EIR) and Initial Study for the 1993 Los Angeles County Congestion Management Program

Dear Ms. Morries:

The City of El Segundo has reviewed the Notice of Preparation of a Draft Environmental Impact Report and Initial Study for the 1993 Congestion Management Program (CMP) for Los Angeles County. We would like to thank you for offering us the opportunity to comment on the Draft EIR for the CMP and submit the following comments:

- *In regards to the Deficiency Plan Component of the 1993 CMP, the Initial Study does not provide enough information or guidance on reporting and monitoring to the Los Angeles County Metropolitan Transportation Authority (LACMTA). We believe that the Deficiency Plan responsibilities and approach should be discussed at greater length in the Draft EIR.*

- *Clearly, LACMTA recognizes that the CMP may have significant impacts on land use patterns and planning decisions of local governments. We are concerned that the 1993 CMP Land Use Analysis and mitigation requirements have not been adequately defined to allow full evaluation of the environmental impacts of the projects.*

We look forward to receiving the Draft Environmental Impact Report.

Sincerely,

Sara Mosleh

Sara R. Mosleh
Associate Planner

cc: Hyrum B. Fedje, Director of Planning and Building Safety
Paul Garry, Acting Senior Planner

Morries.SRM

23920 Valencia Blvd.
Suite 300
City of Santa Clarita
California 91355

Phone
(805) 259-2489
Fax
(805) 259-8125

City of Santa Clarita

June 21, 1993

Ms. Kendra Morries, Land Use Project Manager
Congestion Management Program
Metropolitan Transportation Authority
818 West Seventh Street, Suite 1100
Los Angeles, California 90017

Re: Notice of Preparation/Initial Study of a Draft Environmental Impact Report for the 1993 Congestion Management Program

Dear Kendra:

Thank you for the opportunity to comment on the above mentioned document. Please forward the DEIR as we would welcome the opportunity to review that as well. Our specific comments are as follows:

1. **The use of a countywide fee should be explored as a project alternative and/or a mitigation strategy. At some point, the actual cost of mitigation strategies needs to be addressed, in addition to the proposed point system. Using an in-lieu fee will provide the opportunity to assemble adequate funds from multiple projects to implement regional improvements.**

2. **As drafted, all new trips on the CMP Network are equal, regardless of whether or not the new trips are being added to deficient or free-flowing segments of the highway network. Projects that help improve the jobs/housing balance and/or shift trips to under utilized segments of the highway network should not be treated the same as projects that add trips to deficient highway segments.**

3. **The document specifies that mitigation measures may not necessarily be linked to specific projects, and that mitigation can be used to affect existing activity rather than new development. This approach requires additional legal review and discussion, since the ability to condition a project requires a nexus between the project's impacts and the required mitigation.**

Thank you for the opportunity to comment. Please call Kevin Michel at (805) 255-4351 if you have any questions regarding our concerns.

Sincerely,

Lynn M. Harris
Deputy City Manager
Community Development

LMH:KJM
current\cmp_nop2.kjm

PLANNING DIVISION

CITY OF CULVER CITY

4095 OVERLAND AVENUE, CULVER CITY, CALIFORNIA 90232-0507

(310) 202-5777
FAX (310) 839-5997

JAY B. CUNNINGHAM
City Planner

June 23, 1993

Ms. Kendra Morries, Land Use Project Manager
Congestion Management Program
818 West Seventh Street, M/S 2200
Los Angeles, CA 90017

1993 CMP NOTICE OF PREPARATION COMMENTS

Dear Ms. Morries:

The City of Culver City appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) on the 1993 Congestion Management Program (CMP) for Los Angeles County. Culver City has been an active participant in the CMP process. City staff has reviewed the NOP and the City has the following comments.

o Tiering from Previous Programs and EIRs -- While we appreciate and encourage the tiering concept and understand its usefulness in this instance, the Draft EIR should be completed in such a way that the resulting document stands alone and is understandable to readers who may not have several years of experience with the CMP process. The CMP has evolved significantly in the past year. The quantification of impacts and credits and other vital components of the CMP are now available. It is important for the public to understand the refinements and changes that have occurred and the potential impacts of the program as is now exists. The changes are more profound that the addition of the deficiency plan to the CMP. Key passages from past RMP and CMP program documents, or their EIRs, and from the current NOP/Initial Study should be repeated or referenced in the EIR and provided in the appendices for this EIR. In no instances should local or regional potential impacts discussed in subsequent project-specific (i.e., CIP project) EIRs address issues which were not identified as potential impacts in the 1993 CMP EIR, which is intended to serve as the master tiering environmental document.

At minimum, the complete set of CMP mitigation measures should be provided in the EIR. The existing and proposed measures could be separated for clarity. As discussed below, the RMP and 1992 CMP EIRs do not provide comprehensive impact analysis for several environmental issues. Additional analysis in the 1993 CMP EIR will be required. The 1993 CMP EIR and the guidelines together should provide a complete picture of the requirements and goals of the CMP.

- Supplements to the CMP – The CMP NOP (Page 5) indicates that a brief supplement to the CMP guidelines for analysis of longer range and more generalized development programs will be forthcoming. In our discussions with MTA staff, we have learned that the supplement will be incorporated into the CMP Draft EIR. Standard practice throughout the CMP process has allowed interested parties to review proposed revisions and additions to the CMP guidelines prior to including them. The CMP EIR will also consider the addition of La Cienega Boulevard, from I-10 (Santa Monica Freeway) to I-405 (San Diego Freeway). This addition needs to be reviewed and analyzed. At this point, it appears that timing for the EIR may not allow this type of preliminary review, or that the review of the supplement and network change with the Draft EIR will occur concurrently. In the past, the LACMTA (or its predecessors) has asked that comments on the program be submitted separately from comments on the EIR itself. We therefore reserve the right to comment on the supplement as part of the EIR. We will make our comment separately during the EIR review period if requested.

- Benefits as Well as Impacts Should be Discussed – The initial study indicates no potential impacts for Water (III.e), and provides a summary of impact discussion and mitigation from the 1992 CMP EIR. It should be emphasized in the EIR, as mentioned in the Initial Study, that the levels of pollution deposited on roadways for eventual transport to the storm drain system would vary with the number and length of trips made on these facilities. The CMP encourages fewer trips or reduced length trips. The potential benefit in terms of potentially improved water quality should be discussed in the EIR. Similarly, other environmental benefits of implementation of the CMP should be discussed in the EIR, as was in the RMP EIR (Page 152).

o Impacts not Identified in the Initial Study Should be Discussed -- Potential impacts in the form of traffic hazards to motor vehicles, bicyclists or pedestrians should be discussed as a potential impact. The initial study states that the 1993 CMP does not contain any element that would increase traffic hazards. It is conceivable that lane reconfigurations or restriping, signal timings, and other changes could create traffic hazards, particularly for pedestrians and bicyclists. This is a potential impact that should have been checked "maybe" in the initial study. Discussion of potential impacts should not be discounted in the CMP EIR since this EIR will be used for tiering project-specific projects under the CMP that may have traffic hazard impact potential. The EIR should discuss this impact potential.

The CMP encourages the use of alternative fuel and zero-emission (electric) vehicles. These could potentially impact power or natural gas utilities. Items XVI.a and XVI.b should have been checked "maybe" and the EIR should discuss potential impacts from increased use of alternative fuel and zero-emission vehicles on energy utilities.

The RMP EIR only discussed the energy impacts of Amtrak trains in terms of passenger rail transit. Although transit improvements that have come on line since 1988, such as the MetroRail Red and Blue lines, do not consume fuel, they should be considered for potential energy conservation issues. This issue was not raised in the 1992 CMP EIR.

Similarly, the CMP encourages telecommuting. The potential impact on communications systems should be discussed. The impact of fax machines, cellular networks, and other devices on communication systems in recent years has been tremendous. The number of area codes now serving Los Angeles County is ample evidence of this impact. Telecommuting from home or from satellite telecommuting centers in suburban areas has the potential to continue to impact communication systems. This impact should be discussed in the EIR.

The potential for CMP roadway improvements to create aesthetic impacts should be discussed in the EIR. Grade-separated crossings, for instance, could create aesthetic impacts and block views. Culver City commented about the need for adequate aesthetic impact analysis during preparation of the 1992 CMP EIR.

Fiscal impacts on businesses has not been adequately addressed in the two previous EIRs from which the 1993 CMP EIR will be tiered. Discussion focused on business relocations, employment growth, access to employment areas, and other issues, but did not discuss the fiscal impact on adjacent businesses in terms of lost on-street parking resulting from roadway widenings and restripings. The urban design quality and aesthetics for sustaining and attracting businesses along CMP roadways may negatively affected by street widenings, and needs to be addressed in the CMP EIR.

Cultural resources that have yet to be discovered are protected by mitigation measures provided in the State CEQA Guidelines in Appendix K. Since the CMP may involve disturbing cultural resources to complete facilities, the potential for impacts should be identified in the CMP EIR. Subsequent project-specific EIRs should also discuss this potential impact even if cultural resource inventories do not anticipate a likelihood of impacting cultural resources. Appendix K provides mitigation measures in the event unanticipated or previously unidentified cultural resources are discovered during construction.

o Growth Inducement -- The 1992 CMP EIR states that the potential of the CMP to foster urban deconcentration is negligible. Specifically, the EIR states 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. Therefore, the CMP may provide an additional incentive for growth in outlying areas . . . This impact is considered minor, when compared to existing incentive to locate new development in less congested areas" (1992 CMP EIR, Page 145). While it might be argued that other forces, such as land prices and housing affordability, are the major contributors to urban sprawl, the impact of the CMP to encourage growth in outlying areas should not be discounted.

The avoidance of mitigation measures for congestion for initial development in an area, depending on future "last one on the block" developments for mitigation is a tradition in this region that has led to the congestion problems the CMP was created to address. The potential for improved travel time to encourage longer commutes should be an integral part of the impact discussion in the CMP EIR. The relationships between regional land use control, growth management and the underlying reasons for traffic congestion should also be thoroughly discussed in the CMP EIR.

The RMP EIR stated that the RMP did not create an inducement to growth, it redistributes population and employment growth to achieve better job/housing balance within each subregion (RMP EIR, Page 157). The CMP EIR, on the other hand, states that the CMP is not anticipated to affect the distribution of population and employment at the SCAG subregional level (1992 CMP EIR, Page 44). While the argument that the CMP is not likely to induce regional population growth makes sense, the CMP has the potential to greatly impact the distribution of population and employment within the region. The impact on subregions and local jurisdictions could be significant. Since it is unlikely that the project-specific EIRs for CIP projects will consider subregional impact potential, these impacts should be considered in the 1993 CMP EIR. As Culver City has commented on the 1992 CMP EIR, the discussion on growth inducement potential needs on a subregional or local level, if not regional, and must be supported by recent data and supportable analysis.

o Regional Centers -- The development of regional centers linked by transit is encouraged in the CMP. However, the establishment of regional centers in jurisdictions other than the City of Los Angeles and County of Los Angeles requires intergovernmental coordination, perhaps even Memoranda of Understanding or Joint Powers Agreements. Culver City has commented on this issue for the 1992 CMP EIR.

Local jurisdictions do not want to allow increased density around transit centers until development of the transit system and transit center are guaranteed. Allowing the increased density, only to see the transit improvements not come to fruition has created some of the most congested areas in the region. The offset of localized "hot spot" impacts to regional air emission reductions has been documented in the 1992 CMP EIR (1993 CMP Initial Study, Page 19). The relationship of local land use policy decisions to create regional centers in association and coordination with regional transit facilities should be discussed in the 1993 CMP EIR.

The localized impacts of concentrating development at transit centers has been briefly discussed in the previous EIRs. The RMP EIR did not consider impacts to regional centers in the Urban Form and Growth analysis section. Centers were listed on Page 134 and discussed in terms of county employment growth as part of the regional economy analysis (RMP EIR, Page 138). The 1992 CMP EIR states that individual CIP projects may result in localized adverse traffic impacts, which will be addressed in future project-specific EIRs (1992 CMP EIR, Page 60).

Since the CMP network has been developed to include the major highways and roadways that are currently experiencing congestion, it is logical to assume that the transit centers designated through the CMP process will also be on or near CMP roadways. Concentrated development densities of the intensity and scale considered in the CMP will create additional impacts on these already congested roadways. Even if the capture rate for commuter trips is high for development around these transit centers, the addition of trips by those coming to and leaving the regional centers each day plus daily local trips by transit center residents and employees outside the transit center will add significant numbers of local trips to the already congested local traffic system. Thereby, even though the transit center will facilitate regional mobility, the density of the transit centers will actually increase local congestion and limit local mobility. This impact has been vaguely referenced in previous EIRs and needs to be completely analyzed in the 1993 CMP EIR, as well as future project-specific EIRs. The CMP EIR cannot ignore this potential impact, or defer the basic analysis to future project EIRs, where the impact potential will be fragmented.

In order to analyze the potential impact the CMP EIR should consider the level of concentrated development at a transit center and identify the associated impacts of that increased development. The analysis of traffic impacts alone is not sufficient. The impact on existing infrastructure, such as water and sewer lines (conveyance and treatment capacity), emergency services [the ability to provide service to the transit center and system, not just get around town as discussed in the 1992 CMP EIR (Page 139)], and other public services and utilities, must be discussed as potential impacts of the policies of the CMP itself in the 1993 CMP EIR. Detailed discussion can be provided in CIP project EIRs as these projects relate to specific localized conditions for individual projects.

The real world intensity and potential impacts of the development required to support the transit centers has not been fully considered in any of the previous environmental analysis. We would urge you to review the work recently completed by the UCLA Graduate School of Architecture and Urban Planning under Professor Jurg Lang, to understand potential impacts of regional center development concentration. Those studies of the Exposition Right-of-Way may further assist in the preparation of the 1993 CMP EIR.

Again, we appreciate the opportunity to comment on the scope of the Draft EIR for the CMP. If you have any questions about the above comments, please do not hesitate to call me at (310) 280-5949, or John Rivera, Associate Planner, at (310) 202-5783.

Sincerely,

Steven L. Gerhardt, AICP
Interim CEQA Coordinator

SLG:slg

Copy: Mike Balkman, Mayor
Albert Vera, Vice Mayor
Dr. James D. Boulgarides, Councilmember
Steven Gourley, Councilmember
Jozelle Smith, Councilmember
David M. Glasser, Planning Commission Chairman
Stephen Schwartz, Planning Commission Vice Chairman
John G. Edell, Planning Commissioner
George F. Sweeny, Planning Commissioner
Edward M. Wolkowitz, Planning Commissioner
Jody Hall-Esser, Chief Administrative Officer
Norman Herring, City Attorney
Mark Winogrond, Community Development Director
Jay B. Cunningham, City Planner
James S. Davis, City Engineer
Evelyn Keller, Deputy City Attorney
Carol DeLay, Deputy City Planner
John Rivera, Associate Planner
Jackie Freedman, Project Planner
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GENERAL MANAGER

CITY OF LOS ANGELES
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TOM BRADLEY
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ROOM 1200, CITY HALL
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93333 JUN 24 P3

June 23, 1993

Ms. Kendra Morries
Project Manager
Congestion Management Program
818 West Seventh Street, Suite 1100
Los Angeles, CA. 90017

COMMENTS ON THE CONGESTION MANAGEMENT PROGRAM (CMP) NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) AND INITIAL STUDY

The Department of Transportation, with the assistance of other City departments, has reviewed the NOP prepared for the CMP and submits the following comments:

1. **GENERAL COMMENTS** - The 1993 DEIR should not be a reiteration of the CMP, but rather should examine, quantify, and adequately analyze the potential environmental impacts of the CMP.

2. **DEFICIENCY PLAN** - All provisions of the CMP Deficiency Plan, particularly the valuation of mitigation strategies (which is not yet complete), must be considered in the EIR analysis. This is a significant element of the CMP and any analysis that fails to include it would be inadequate.

   As identified on page 5, subsection 5 (Proposed 1993 CMP Update, Deficiency Plan procedures), the 1993 CMP will include a provision for Deficiency Plan procedures. As such, the EIR should discuss the potential impacts of implementing the mitigation strategies as required by the Deficiency Plan. Since the mitigation strategies have not yet been determined, or at least agreed upon, all potential mitigation alternatives must be discussed in the EIR.

3. **SOCIO-ECONOMIC IMPACTS** - Under the California Environmental Quality Act (CEQA), the economic and social impacts of a project, as they relate to physical changes in the environment, must be addressed. Socio-economic analysis of the CMP seems appropriate given the potential for large scale changes in the regional transportation network and land use patterns. A comprehensive analysis of the impacts on jobs and business is necessary. The CMP, particularly the Capital

Improvement Program (CIP) projects, will result in a large number of physical changes, yet no socio-economic analysis is presented. The Department of Transportation recommends that the 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.

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.

4. **DECONCENTRATION/LAND USE** - The City of Los Angeles' Centers Concept has a central goal of citywide congestion reduction, linking new development with transportation systems. This is also the objective governing the MTA in its development of the Joint Land-use Transportation Policy, developed in conjunction with the City. If the CMP results in urban deconcentration, it would be in direct conflict with our mutual 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.

The CMP might significantly alter the land use in the region; thus, the DEIR should contain discussion of the CMP's effect on density, distribution, growth rate, or relocation of population.

The NOP should provide an adequate analysis of the CMP's impacts on deconcentration. The EIR must fully analyze and address the CMP's impacts, particularly its relationship to land use. Moreover, the EIR should discuss the CMP's effect on the long-term goals of improving the region's jobs/housing balance and reducing VMT as outlined in the Regional Mobility Plan (RMP) and General Mobility Plan (GMP).

The 1992 DEIR stated 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, 1992 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 in the 1993 CMP EIR.

5. **CONSTRUCTION IMPACTS** - The 1992 DEIR indicated 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 in the 1993 EIR.

   The impact of noise is listed as "no." This should be changed to "maybe" and the impact of noise during construction should be addressed.

6. **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. This additional gauge will measure whether or not deconcentration occurs with implementation of the CMP. Deconcentrating effects of the CMP should be offset or mitigated.

7. **LINKAGE WITH RMP** - The Southern California Association of Governments (SCAG) is preparing an update to the RMP, a Regional Mobility Element (RME), as part of the Regional Comprehensive Plan. The TDM population, housing, and employment assumptions, in the new RME appear to be substantially different from those used in the 1988 RMP. We urge the MTA to use the updated population, employment, and TDM assumptions in the 1993 RMP.

8. **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.

9. **AIR QUALITY** - The NOP lists four potential direct impacts of the 1993 CMP that were not covered in the 1992 CMP EIR. In addition to the impacts listed, the construction and/or operation of CIP projects that add general traffic lanes to freeways or highways could encourage additional vehicle trips on the affected roadways by providing additional capacity

(latent demand). Public transit and/or rideshare trips could be encouraged to change back to single occupant vehicle trips if general traffic commute times decrease on the affected roadways. This potential impact must be analyzed, and mitigation measures required, in the air quality section of the DEIR.In mitigation measure C.1, construction phase emissions and criteria pollutant concentrations should be compared to SCAQMD quarterly, as well as daily, emission thresholds. (See 1993 SCAQMD CEQA handbook, Chapter 9.)

The NOP discusses the indirect impacts of the Deficiency Plan requirement resulting in the changes in land use and states that this impact will be assessed in the 1993 CMP EIR. Since this analysis has not yet taken place, it is premature to state that Mitigation Measure C.3 would be sufficient to address this indirect impact. In the 1993 CMP EIR, additional mitigation measures must be considered to mitigate this impact.

Mitigation Measure C.4, proposed by the 1992 EIR to mitigate potential "hot spots" created by CMP-related improvements, assumes that regional emission reductions would represent a trade-off with new, localized hot spots. Rather, the 1993 DEIR should require mitigation measures to reduce the creation of new hot spots. This impact, and recommended mitigation, should be addressed in the 1993 EIR.

10. **HOUSING AND POPULATION** - The analysis under the housing and population sections of the DEIR should include an analysis of the potential increase in housing demand, and therefore population, in outlying areas (if deconcentration results from CMP projects) as well as increases in housing demand and population in central and transit areas if concentration results.

The NOP states that the 1992 EIR did not contain an analysis of utilities impacts since the RMP was formulated in conjunction with the Regional Growth Management Plan (GMP). If this EIR will rely on the analysis in the GMP EIR for utilities impacts, the GMP EIR should be incorporated by reference.

11. **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 a healthy standard of living in Southern California.

The CMP does not consider the special mobility issues related to trucks and goods movement. Trucks have two major impacts on the County's highway system:

a. Trucks are not as easy to maneuver as cars. The bigger the truck, and the more trailers it caries, the more highway capacity it uses up. Trucks require more highway capacity, especially in heavy traffic, and can hold up traffic significantly when making turns at intersections and driveways.

b. Truck accidents can cause a great deal more congestion than cars. One truck accident can close a highway for several hours. Also, accidents involving trucks transporting hazardous waste can close an entire area for hours.

While trucks make deliveries throughout the County, certain parts of the County (such as the cities of Commerce and Vernon), including portions of the City of Los Angeles (e.g., the Port, Union Station, and the Alameda Corridor), are major generators of truck traffic. The EIR should quantify the extent of truck traffic in the County, consider the specific problems created by them, and determine ways to mitigate them.

Additionally, the CMP should look into monitoring truck traffic and, with the help of local jurisdictions, find ways to reduce truck traffic and alleviate their impacts.

12. **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 that serve 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.

Thank you for the opportunity to respond to the CMP NOP. If you have any questions, feel free to call Sami Wassef, of my staff, at (213) 237-2873.

Thomas Conner

THOMAS K. CONNER
General Manager

cc: Departments
City Council
Mayor's office

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State of California

Business, Transportation and Housing Agency

Memorandum

To :

Mr. Tom Loftus
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Wilford Melton -District 7

From : DEPARTMENT OF TRANSPORTATION

Subject : Project Review Comments

SCH No.93051061

Date : July 1, 1993

File No.: IGR/CEQA/NOP,
1993 CONGESTION
MANAGEMENT PROGRAM
FOR LOS ANGELES COUNTY

Vic. LA-VARIOUS

1993 JUL L.A.C.M.P.

Caltrans has reviewed the above-referenced document. Based on the information received, we have the following comments:

Precise and detailed provisions, including time-frames are needed in the document to provide for: the local jurisdiction congestion mitigation goal, MTA assignment of mitigation points, and circumstances by which local jurisdiction receives deficiency and credit points.

If you have any questions regarding this response, please call me at (213) 897-1338.

Original Signed By

WILFORD MELTON
Senior Transportation Planner
IGR/CEQA Coordinator
Advance Planning Branch

cc: Kendra Morries
LA County Metropolitan Transportation Authority
818 W. 7th Street MS 2200
Los Angeles, CA 90017

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CITY OF LONG BEACH

DEPARTMENT OF PLANNING & BUILDING

333 WEST OCEAN BLVD. • LONG BEACH, CALIFORNIA 90802

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Community & Environmental Planning Division

June 22, 1993

Kendra Morries
Land Use Project Manager
Congestion Management Program
LACMTA
818 W. 7th Street, Suite 300
Los Angeles, CA 90017

Subject: 1993 Congestion Management Program for Los Angeles County

Thank you for the opportunity to review Notice of Preparation and Initial Study. We have no comments at this time. Please send a copy of the DEIR when it is available.

Sincerely,

Joan Maner for

Gerhardt H. Felgemaker
Environmental Planning Officer

GHF:jm

APPENDIX D - SCAG CONSISTENCY CRITERIA

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:

- consistency between the countywide model/databases and SCAG's regional model and databases;
- consistency with the regional transportation plans;
- compatibility with the other CMPs developed within the region; and
- 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 agency[1] 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.

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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 process[2] 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.

APPENDIX E - DEFICIENCY PLAN CREDITS AND DEBITS

Appendix E
Table E–1

Deficiency Plan Debit Values

	LAND USE CATEGORY	DEBIT VALUE
1	Single Family Residential	6.80 per Dwelling Unit
2	Multi–Family Residential	4.76 per Dwelling Unit
3	Group Quarters	1.98 per Bed
4.1	Commercial (less than 300,000 gsf)	22.23 per 1000 sq.ft.
4.2	Commercial (300,000 gsf or more)	17.80 per 1000 sq.ft.
5	Freestanding Eating & Drinking	66.99 per 1000 sq.ft.
6	Lodging	7.21 per 1000 sq.ft.
7	Industrial	6.08 per 1000 sq.ft.
8.1	Office (less than 50,000 gsf)	16.16 per 1000 sq.ft.
8.2	Office (50,000–299,999 gsf)	10.50 per 1000 sq.ft.
8.3	Office (300,000 gsf or more)	7.35 per 1000 sq.ft.
9	Medical	16.90 per 1000 sq.ft.
10	Government	20.95 per 1000 sq.ft.
11	Institutional/Educational	7.68 per 1000 sq.ft.
12	Other	0.71 per Daily Trip

Source: Draft 1993 CMP, July 1993

Appendix E Table E–2 Mitigation Strategy Values

Refer to Detailed Mitigation Strategy Criteria & Definitions for Additional Information

CATEGORY	ACTION	Classification (if applicable)	Point Value
LAND USE STRATEGIES			
1	Focus residential dev't around transit centers		2.0 per dwelling unit
2	Focus commercial dev't around transit centers	Retail	23 per 1000 gross sq. ft.
		Non–Retail	11
3	Focus residential dev't along transit corridors		0.8 per dwelling unit
4	Focus commercial dev't along transit corridors	Retail	8.7 per 1000 gross sq. ft.
		Non–Retail	4.1
5	Focus residential mixed use projects around transit centers		4.9 per dwelling unit
6	Focus commercial mixed use projects around transit centers	Retail	23 per 1000 gross sq. ft.
		Non–Retail	11
7	Focus residential mixed use projects along transit corridors		1.9 per dwelling unit
8	Focus commercial mixed use projects along transit corridors	Retail	8.7 per 1000 gross sq. ft.
		Non–Retail	4.1
9	Provide residential mixed use development		1.6 per dwelling unit
10	Provide commercial mixed use development	Retail	7.7 per 1000 gross sq. ft.
		Non–Retail	3.6
11	Supportive social services in conjunction with development	Residential	0.7 per dwelling unit
		Com. Non–Retail	3.1 per 1000 gross sq. ft.

Source: Draft 1993 CMP, July 1993

Appendix E Table E–2 Mitigation Strategy Values

Refer to Detailed Mitigation Strategy Criteria & Definitions for Additional Information

CATEGORY	ACTION	Classification (if applicable)	Point Value
CAPITAL IMPROVEMENTS			
1	High Occupancy Vehicle lane	CMP Arterial	20,400 per lane–mile
		Other Major Art	16,320
2	General use highway lane	CMP Arterial	11,504 per lane–mile
		Other Major Art	9,203
3	Intersection grade separation	CMP Arterial	Credit determined individually
4	Freeway ramp addition or modification		1,150 per ramp
5	Urban rail station		7.9 per Yr 2010 boarding
6	Commuter rail station		20 per Yr 2010 boarding
7	Goods Movement Facility		288 per 100 truck–miles
TRANSPORTATION SYSTEMS MANAGEMENT			
8	Traffic signal synchronization	CMP Arterial	1,841 per mile (4 lane arterial)
			2,761 (6 lane arterial)
			3,681 (8 lane arterial)
		Other Arterial	1,473 per mile (4 lane arterial)
			2,209 (6 lane arterial)
			2,945 (8 lane arterial)
9	Traffic signal surveillance & control (including synchronization)	CMP Arterial	3,221 per mile (4 lane arterial)
			4,832 (6 lane arterial)
			6,442 (8 lane arterial)
		Other Arterial	2,577 per mile (4 lane arterial)
			3,865 (6 lane arterial)
			5,154 (8 lane arterial)
10	Peak period parking restriction for thru lane	CMP Arterial	2,301 per lane–mile (2 hr)
			3,451 (3 hr)
			4,141 (4+ hr)
		Other Arterial	1,841 per lane–mile (2 hr)
			2,761 (3 hr)
			3,681 (4+ hr)
11	Intersection modification	CMP Arterial	575 per Intersection
12	Bicycle lane or path		700 per lane–mile
13	Park and Ride lot		10 per space

Source: Draft 1993 CMP, July 1993

Appendix E Table E–2 Mitigation Strategy Values

Refer to Detailed Mitigation Strategy Criteria & Definitions for Additional Information

CATEGORY	ACTION	Classification (if applicable)	Point Value
DEMAND MANAGEMENT PROGRAMS			
Ridesharing Operations			
1	Formal Trip Reduction Program for Small Employers		36.3 per 100 employees
2	Employer–based Alternative Work Schedules		7.3 per 100 employees
3	Transportation Management Assoc/Organizations		46 per 100 employees
4	Aggressive Vanpool Formation Program		31 per 100 employees
5	Informal Carpool & Vanpool Program		28 per 100 employees
Ridesharing Support Facilities			
6	Phase I TDM Ordinance		0.30 per 1000 square feet
7	Passenger Loading Areas for Carpools & Vanpools		6.9 per 100 employees
8	Childcare Centers at Transit Facilities		Credit determined individually
9	Bicycle/Pedestrian Facilities		4.6 per 100 employees
10	Preferential Parking for Rideshare Vehicles		3.9 per 100 employees
Ridesharing Incentives			
11	Transit Subsidy Program		213 per 100 employees
12	Vanpool Subsidy Program		206 per 100 employees
13	Carpool Allowance		90 per 100 employees
14	Bicycle Allowance		9.2 per 100 employees
15	Walking Allowance		6.2 per 100 employees
16	Buspool Subsidy Program		102 per 100 employees
Parking Management & Pricing			
17	Increased Parking Cost for SOV's by $0.50/day		7.2 per 100 employees
18	Increased Parking Cost for SOV's by $1.00/day		21 per 100 employees
19	Increased Parking Cost for SOV's by $3.00/day		86 per 100 employees
20	Parking Cash Out		Work in progress
21	Parking Surcharge		Work in progress
Telecommunications			
22	Telecommuting Program for Small Employers		3.2 per 100 employees
23	Neighborhood Telework Center		Work in progress
24	Business/Education Videoconferencing Center		Work in progress
25	Remote Access to Government Info/Transactions		Work in progress
Transit Improvements			
26	New Local or Commuter Bus Service		1.0 per passenger–mile
27	Feeder Services to Multi–modal Transit Centers		1.0 per passenger–mile
28	Shortening of Headways		1.0 per passenger–mile
29	Restructuring of Service		1.0 per passenger–mile
30	Subscription Bus or Buspool Operations		1.0 per passenger–mile
31	Internal Circulator Shuttle		1.0 per passenger–mile

Source: Draft 1993 CMP, July 1993