

Re: COUNCIL MEETING, AUGUST 29, 2017, AGENDA ITEM 11, COUNCIL FILE 17-0537, CD 11, DIR-2016-304-DB-SPR-1A, CEQA No. ENV-2016-2229-MND - SUPPORT

Larry

Aug 29, 2017 7:45 AM

Posted in group: **Clerk-PLUM-Committee**

The Honorable Mayor Garcetti
The Honorable Mike Bonin, Councilman, Mar Vista District:
City Planner: Mr. Vince Bertoni
City Clerk, PLUM Committee

1. I am a resident of Mar Vista and I support the Motion by our Council Member, Mike Bonin, to require that the Project be modified to reduce its impact on the neighborhood
2. I oppose the City Planning Commission and Planning Department's approval of the Project, as proposed, for the reasons stated in the Appeal filed by the West Mar Vista Residents Association and the South Mar Vista Neighborhood Association.

Kathryn M. Schwertfeger
229 Montreal Street
Playa del Rey, CA 90293

August 29, 2017

The Los Angeles City Council
200 North Spring Street
Los Angeles, California 90012

Re: Council File Number 17-0537- August 29, 2017 Agenda 12440- 12492 Venice Boulevard

Ladies and Gentlemen:

This matter was heard by the Planning and Land Use Committee (“PLUM”) on August 22, 2017. Subsequent to that hearing on August 15, 2017, the Applicant requested consideration of its application and on Friday, August 25, 2017, the Los Angeles City Planning Department issued a report finding the project is entitled to an exemption from the California Environmental Quality Act (“CEQA”) under 21155.1 of the Public Resource Code (the “Exemption Application”). The PLUM waived consideration of the Exemption Application on August 25, 2017—I note a date the PLUM was not even in session. The City Council Clerk then placed the Exemption Application, and the City Planning Department’s over 1,000 page report on the application, on the City Council agenda for a meeting to be held a mere single business day after the agenda was published. There was no circulated public notice of the hearing to be held on the Exemption Application and the hearing is required by law. Functionally a gag order on the public. Also, a deliberate evasion of due process as the Exemption Application and the Planning Department’s in excess of 1,000 page report has been pending for months and could have been placed on the agenda for the Planning and Land Use Committee for the August 22, 2017 hearing, with adequate notice and opportunity to be heard given to the affected community.

I respectfully request that the City Council take one of two actions regarding the exemption application:

1. If the City Council adopts the report and findings of the PLUM, approves a modified project and determines the CEQA review for the project is adequate, then the City Council should decline to act on the Exemption Application as moot. The project has environmental clearance under CEQA and, accordingly, does not need an exemption.
2. If the City Council decides to consider the Exemption Application, then the City Council should first refer the application to the Planning and Land Use Committee for a proper hearing with adequate notice and opportunity for the community to respond and the City Council to properly evaluate the application.

I also request that the arguments submitted to the City Planning Commission in my letter delivered to James Williams on April 17, 2017 be considered in the decision to approve or deny the

Exemption Application. I recognize the City Planning Department's Report may have been modified but believe the arguments still apply. I have attached a copy of my letter for your reference.

Further, I have the following additional arguments:

1. The Applicant has produced voluminous environmental reports. These reports are intended to satisfy the requirements for the Sustainable Communities Exemption which requires: that the project site will not expose the occupants to environmental hazards (Public Resource Code Section 21155.1(a) (4)) and that the project site is not subject to risk of public health exposure in excess or legal limits (Public Resource Code Section 21155.1(b) (5) (C)).

The Reports, however, actually explain the site is PCE contaminated. As a result, a number of consultant's call for ground water testing to ensure only the soil at the site is contaminated. In fact, one of the consultant's hired by the Applicant reviewed the historical testing and said specifically that the ground water should be tested. Applicant did not want to do and has never done ground water testing. In fact, based on the Reports no ground water testing has ever been conducted at the site—this despite the fact that the Southern California Water Quality Resource Board (SCWQRB), when consulted informally by one of the consultant's, strenuously recommending the testing, noting that some of the highest levels of PCE contaminated water encountered in their experience, occurred with low level PCE soil contamination and soils like those at the project site.

Despite, all this advice and history documented in the multiple reports, to meet the criteria for the Sustainable Communities Exemption, the Applicant simply hired a second consultant who wrote a limited report. This report was for a building which had a maximum foundation depth or excavation depth, which did not reach the ground water. Accordingly, the consultant was able to conclude that the PCE in the soil would be removed during soil excavation for the foundation and there was no health hazard.

As modified by the PLUM, the building will need to construct underground parking. We have no analysis of whether or not the newly configured building will reach ground water and require dewatering. We have no analysis of the likely effects or remediation plan if ground water is reached and is, as the SCWQRB suspected, contaminated. But more importantly, we have no idea if the assumptions Applicant's consultant used to conclude the project would not expose its occupants or the public to hazards remain true for the reconfigured project. The CEQA Errata issued by the Planning Department deliberately avoided the issue of PCE and the likelihood of digging into the untested ground water. And, we are outside the parameters, or assumptions of the report written by Applicant's consultant finding the project could meet the requirements for a Sustainable Communities Exemption.

In addition, Public Resource Code 21155.1(a) (4) requires the assessment of whether or not project occupants might be exposed to contaminants and then requires—prior to the granting of the exemption—that the exposure be mitigated. Quoting the code:

“(A) If a release of a hazardous substance is found to exist on the site, the release shall be removed or any significant effects of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements.

(B) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with state and federal requirements.” Public Resource Code 21155.1(a)(4)(A) and (B).

There is no basis for the City Council to reach the conclusion that the requirements of either of these paragraphs have been met. It is imminently logical that the Sustainable Communities Exemption does not exempt a project from CEQA, divesting the lead agency of authority to protect the public, until after remediation is complete. The words mean what they say—the required finding cannot be made.

I further note that this failure to consider the potential impacts of the revised project resulting from dewatering of contaminated ground water and the secondary impacts of any proposed remediation is another reason the environmental review for this project is inadequate and an EIR is required.

2. The Project also does not comply with Public Resource Code Section 21155.1(b) (5), which requires compliance with mitigations in prior area environmental reports, as a condition to granting the Sustainable Communities Exemptions. Specifically, the Mitigated Negative Declaration for the Palms-Mar Vista- Del Rey Community Plan imposed mitigations on the Plan area, based on the then operative General Plan Framework Element, which are reflected in the Initial Study and embodied in the text of the Community Plan. Multiple hearing participants have commented and written regarding the failure of the Project and the Planning process to comply with these mitigations, including limiting mixed use development to selected areas, which do not include the project location, to avoid excess density and provide adequate public resources in the community; requiring project reviews to ensure that LOS for traffic meet minimum standards; requiring confirmation from the Fire Department that fire protection resources in the area are adequate for the project; and requiring confirmation that police services in the area are adequate for the project; and requiring project review for adequate parking.

Finally, as the “bus route” adequacy has been much debated in this matter, I will be forwarding additional emails from the Southern California Association of Governments (SCAG) which reissue the maps relied upon by the Planning Department in the Exemption Application. The new maps are legended requiring the City to verify the schedules with the transit provider rather than simply relying on the maps in making transit priority area, major transit stop and high quality transit area determinations. I note that Ms. Lakisha Hull of the Planning Department received the same revised maps—at least according to the SCAG.

Los Angeles City Council

August 29, 2017

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I thank you for your consideration.

Very truly yours,

Kathryn M. Schwertfeger X

Kathryn M. Schwertfeger
229 Montreal Street
Playa del Rey, CA 90293

KATHRYN M. SCHWERTFEGER

229 MONTREAL STREET

PLAYA DEL REY, CA 90293

April 17, 2017

Los Angeles City Planning Commission
200 North Spring Street
Los Angeles, California 90012

Re: 12444 Venice Boulevard—DIR-2016-304-DB-SPR

Ladies and Gentlemen:

I appreciate the opportunity to provide additional information related to the appeal previously filed and in rebuttal to the information provided with the Department of City Planning Staff Recommendation Report (the “Staff Report”).

The Planning Department has been generous enough to provide a PDF link to parts of the Planning File. The link is <http://planning.lacity.org/StaffRpt/InitialRpts/DIR-2016-304.PDF>. To simplify focus on key issues, I have selectively removed pages from the PDF file and attached them to this document, but when I am referencing the Staff Report or the documents provided, they are all in the PDF link, whether I have reprinted them or not.

1. Due Process and Public Hearing Concerns.

Oddly, the applicant filed a request for Statutory Exemption as a Sustainable Communities project pursuant to Public Resources Code Section 21155.1 on March 29, 2017, which the Staff issued a report supporting on April 10, 2017—precisely 10 days before the City Planning Commission Hearing. The notice for the hearing had gone out earlier with reference to this request, so the Planning Department was clearly aware of the tactic and preparing its report. As part of the request, the applicant has filed multiple environmental consultant reports which date back to 2001 and others which were prepared as recently as March and April 2017 and were not in the Planning Department files as of January 18, 2017 when I reviewed the files pursuant to my first public records act request. All told, it amounts to several hundred new pages which the public is being given only 7 days from publication of and access to the Staff Report to review, try to arrange expert opinions and then comment on—two pages and one minute each to speak at a time-- at the City Planning Commission hearing per standing rules, effectively a gag order.

I note that while CEQA generally does not require public hearings—Public Resource Code Section 21155.1 expressly does. Public hearings require procedural due process. Here, however, the clear intent of the tactic is to avoid meaningful participation by the affected public in the mandated hearing.

2. CEQA Concerns with Process.

When a lead agency issues a Mitigated Negative Declaration it does so on the basis that potential impacts have been adequately disclosed, evaluated and mitigated. The Mitigated Negative Declaration serves as the disclosure document which is made available to other public agencies and the public for comment. Here, we started that process with a very limited Mitigated Negative Declaration dated September 16, 2016 (the “MND”). Nonetheless, to justify the decisions of the Los Angeles Planning Department in having approved the MND in the first place, the applicant is now submitting multiple consultant’s analysis—which again were not available at the time of the original decision or the time when the public was commenting on the MND. At the time the MND was prepared and circulated the information on which it was based, simply looking at the voluminous new materials and consultant’s reports, was inadequate. The public is now allowed 7 days to respond once again via two page submissions and one minute public comments. This is not the process or sequence contemplated to give the decision maker, other agencies and the public opportunity to participate in the disclosure, comment, evaluation and review process which is the heart of CEQ. CEQA is a guardian of transparent, participatory government, which this process has completely subverted, violating CEQA and due process yet again.

By way of example, as to how the ball has been significantly hidden, I note we have toxic PCE contamination, in excess of residential acceptable limits, first disclosed in the Staff Report. Several consultants, including applicant’s own, have recommended reporting the contamination to the RWQCB—but that has not been done over a period of years. Nor has there been any groundwater testing, which several of the consultants have recommended on the basis that proper characterization requires characterization of the groundwater. Moreover, the applicant’s soils geology reports indicates that the piles may very likely drive into groundwater, depending on seasonal variations, requiring dewatering in a potentially contaminated body of water. Suffice it to say, there would be more to say, even just cross referencing applicant’s own reports if there was more time.

3. Project Does Not Qualify for the Statutory Exemption Sustainable Communities Project pursuant to Public Resources Code Section 21155.1.

A. The Project is Not in a “TPA” or Transit Priority Area as Defined.

There are so many what’s required as far as transit definitions (all a little different)—to qualify for a particular exemption, incentive or exception— that for each finding you need to check your bearings. Here, the Sustainable Communities Strategy Exemption prepared by the Planning Department dated April 10, 2017 starts with the proposition that: “The site is within 350’ of the corner of Venice and Centinela—a Major Transit Stop.” Sustainable Communities Strategy Exemption Checklist, page 1. Under Public Resources Code Sections 21055/21055.1, you look to a Public Resources Code Section 21064.3 to determine what is a Major Transit Stop. The provision is as follows:

Major transit stop means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

There is a dispute between Planning and appellants regarding the meaning of this provision. Planning has somehow concluded that the intersection between Big Blue Route 14 and Metro Route 733, at Centinela and Venice, qualifies as an intersection with two bus routes at 15 minute intervals during peak morning and afternoon commute times. The West Mar Vista Residents Association submitted bus tables which show that there is only one bus route which hits the required threshold of every 15 minute service and then only in the morning—Santa Monica “Big Blue” Route 14. Otherwise, none of the individual bus routes which go in different directions, with different stops have the required 15 peak commute interval for either morning or afternoon commutes based on the materials submitted by the Mar Vista Home Residents Association. Metro Route 733, specifically, operates at 19 and 27 minute intervals morning and afternoon. I note the statute looks at bus route schedules, not how many buses going in different directions, on different routes, might stop at a given intersection, within a given time. Planning is relying on the “combined frequency of service” of Big Blue Bus Route 14 and Metro Rapid 733 (Staff Recommendation pg. A-9), a standard which is at odds with the plain language of the statute and is not a metric useful to anyone trying to go in a specific direction, toward a given destination, from a given intersection. And, hence, at best a tortured interpretation of what the Legislature meant.

Our analysis should stop right here and we should go back to reviewing CEQA. I might add that the same Public Resource Code provision is operative under SB 743 for determining whether aesthetic impacts, traffic and parking are considered under CEQA and for the same reason, the project is not located near a Major Transit Stop, and all of these impacts must be analyzed.

B. The Approved 2016 RTP/SCS Is Not Adequately Clear to Support the Required Finding of Consistency.

In order to be considered a “sustainable communities” project—the project also must qualify as a “transit priority project” which meets the following standards:

(a) This chapter applies only to a transit priority project that is consistent with the general use designation, density, building intensity, and applicable policies specified for the project are in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board, pursuant to subparagraph (H) or paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted a metropolitan planning organization’s determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emissions reduction targets. Public Resource Code Section 21155(a).

The Southern California Association of Governments (“SCAG”), the metropolitan planning organization which includes the City of Los Angeles, has in fact adopted such a plan, the 2016 RTP/SCS Plan, which has been certified by the State Air Resource Board (the “RTP/SCS Plan”). The RTP/SCS Plan, however, does not provide adequate definition of the “general use designation, density, building

intensity and applicable policies” to enable the required finding that this project is consistent with the plan.

On January 20, 2016, the Los Angeles City Planning Department submitted a letter to the SCAG which addressed this exact point in great detail (“Planning RTP/SCS Comment Letter”). See Attachment 1. The letter is incorporated herein by reference and highlights a myriad of issues that prevent the City from making any fact based determination that the project is consistent with the RTP/SCS Plan.

The final RTP/SCS Plan, as approved by the State Air Resources Board, did not address these fatal flaws highlighted by the Los Angeles City Planning Department’s comment letter. I have attached as Attachment 2 selected pages, from the final RTP/SCS Plan materials located on the SCAG website, which still contain the same material flaws the City critiqued. The final materials are located at these links:

http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_05_RoadToGreaterMobilityAndSustainableGrowth.pdf and the Appendixes referenced in the City’s letter are located at http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf.

I further note that there is no meaningful analysis of how the Los Angeles Planning Department has made the finding required by Public Resource Code Section 21155(a) in the Checklist analysis included in the April 10, 2017 data dump. In other words, you have no factual basis to make the finding and certainly no rebuttal to the Planning RTP/SCS Comment Letter which explains why you cannot make the finding.

To the extent the Checklist analyzes the issue it reverts to the background data tables which identify General Plan Land Use. Checklist pg. 2. The staff at SCAG has clearly read the whole Palms-Mar Vista- Del Rey Community Plan (the “Community Plan”) and interprets the Community Plan the same way appellants do. The first page of Attachment A to the Checklist is the SCAG’s map of land use based on the “General Plan” dated 2015 and it does not include the project in the color code for “mixed use residential,” rather the code is “Commercial and Services.” Attachment 3.

After this reference, the Checklist moves on to the Development Type maps which have “urban area” designations color coded “Urban, Compact and Standard” found in the background section. First, reading the text, these were generalizations about aggregate land use used to model different transportation impact scenarios—not the approved plan outcome. So a finding of consistency with the maps, is not a finding of consistency with the RTP/SCS Plan rather it’s a finding of consistency with a modeled scenario. As noted in the RTP/SCS Comment Letter the relevant land use policies to be referenced in making the consistency finding are not the Development Types found in the background section but rather the “Policies” articulated in the final Chapter 5, which are discussed below. To the extent the background maps are of relevance, as noted in the Planning RTP/SCS Comment Letter, the maps are at best generalized use patterns, not actual “general use, density and intensity” designations. Beyond that, the maps are dysfunctional for use in making a consistency finding in the City of Los Angeles because they are essentially illegible. RTP/SCS Comment Letter paragraph 3, subsection 3.

I suggest the more cogent analysis by the Planning Department is found in the RTP/SCS Comment Letter which makes the required consistency finding unsupportable. The Checklist is a wish

that SCAG had done a better job and an attempt to fashion an analysis pinned to a framework SCAG did not adopt.

C. The Project Is Not Consistent with the 2016 RTP/SCS at a Policy Level.

In addition, if one reads the RTP/SCS Plan, the proposed land use strategies keep local serving retail and jobs near housing. The logic is that this will reduce trip lengths for services and enable walking and biking to amenities. The RTP/SCS Comment letter guides us to the specific concepts of land use which go with the strategies adopted by the RTP/SCS in paragraph 3, subsection 2, each of which illustrates this point:

Land use policies: Livable Corridor strategies include the development of mixed-use retail centers at key nodes along the corridors, increasing neighborhood-oriented retail at more intersections and zoning that allows for the replacement of under-performing auto oriented strip retail between nodes with higher density residential and employment. These strategies will allow more context sensitive density, improve retail performance, combat blight and improve fiscal outcomes for local communities. 2016 RTP/SCS pg. 78, Chapter 5.

More Options of Short Trips

Neighborhood Mobility Areas

NMAs have a high intersection density, low to moderate traffic speeds and robust residential retail connections. These areas are suburban in nature, but can support slightly higher density in targeted locations. The land use strategies include shifting retail growth from large centralized retail strip malls to smaller distributed centers throughout an NMA. This strategy has shown to improve the use of active transportation or NEVs for short trips. RTP/SCS pg. 79.

Complete Communities

Development of “complete communities” can provide households with a range of mobility options to complete short trips. The 2016 RTP/SCS supports the creation of these mixed-use districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other. Focusing a mix of land uses in strategic growth areas creates complete communities wherein most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile. RTP/SCS pg. 79.

This project, and the probable development Planning predicts will follow this model in Area 46, does exactly the opposite by further separating housing, jobs and residential serving businesses in the Mar Vista area. The Community Plan recognized that the plan area was predominantly residential zoned with only limited available commercial. Community Plan pages I-1 to 2. An objective of the plan

was: "To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial." Objective 2-1, page III-4.

Even if you assume Area 46 permits mixed use (which I don't)— replacing the limited commercial/retail space which services the Mar Vista community with a mixed use development that provides nominal replacement for lost retail is entirely inconsistent with any described land use strategy in the RTP/SCS Plan. I reference my earlier letter attached as Exhibit A to the multiple appeals and Mr. Saeed Ali's letter dated April 2017 which both discuss how this project, and development based on the model this project represents, will deprive the community of small business and local serving retail. As discussed in Mr. Ali's letter this drift from a community served by local establishments to a community with postage size store fronts creates environmental impacts which must be described, considered and evaluated under CEQA and a fair argument of adverse impact warranting an EIR.

But more to the point here-- the project interacts with the Mar Vista community in a way that does not match any sustainable communities land use strategy or model in the RTP/SCS. Hence, you cannot make the required consistency finding and dismiss CEQA.

D. This Project Does Not Meet Title 24 plus 15%.

Public Resource Code Section 21155.1(8) (a part of SB 375 adopted in September 2008) requires a project to be 15% more energy efficient than the Title 24, Chapter 6 energy efficiency standard to qualify for a Sustainable Communities CEQA exemption. The Checklist does not even attempt to analyze this project against the version of Title 24, Chapter 6, which is in effect as of January 1, 2017 and to which the project is subject. Rather the Checklist argues that to determine compliance, we should look backward to the Title 24 energy efficiency standards of 2008 when SB 345 was adopted. The logic is that compliance with a Statute, which references a regulation or other law, is always measured based on the regulation or other law in effect at the time the Legislature adopted the Statute at issue.

This logic may be correct sometimes but is incorrect in this case. Here we have a code the Legislature knew is updated, as a matter of law, every three years by the California Building Standards Commission. The Legislature also had the stated goal of progressively improving California and planet's environment by implementing energy efficient strategies over time to reduce greenhouse gas emissions back to 1990 levels. Easier CEQA review was one tool adopted to encourage developers and local agencies to reduce greenhouse gases. Given this goal, it is illogical to conclude that the Legislature's intent was to forever accord projects which merely meet the state of the art in 2008 a CEQA exemption. The SB 375 enactment Section supports this argument.

Section 1

(b) In 2006, the Legislature passed and the Governor signed Assembly Bill 32 (Chapter 488 of the Statutes of 2006; hereafter AB 32), which requires the State of California to reduce its greenhouse gas emissions to 1990 levels no later than 2020. . .

(f) The California Environmental Quality Act (CEQA) is California's premier environmental statute. New provisions of CEQA should be enacted so that the statute encourages developers to submit applications and local governments to make land use

decisions that will help the state achieve its climate goals under AB 32, assist in the achievement of state and federal air quality standards, and increase petroleum conservation.

The Checklist's reasoning is not consistent with the stated purpose of the law. In fact, the timeline also makes no sense, as the standards the Checklist wants us to harken back to were developed based on policy sessions which occurred in December 2008, after SB 375 was adopted in September of the same year. Reading SB 375, which has a broad stated goal of reducing emissions to 1990 levels to somehow be limited by standards for energy efficiency adopted after the SB 375 which standards reduce emissions by a lesser target is not consistent with the Legislative intent. Good, better, best. . . was the intent of the Legislature; not rest on your laurels of achieving a compliance level which will never reach the end goal of 1990 levels by 2020.

If this applicant is accorded a Sustainable Communities exemption from CEQA it should be on the basis of complying with a condition substantially as follows:

Prior to issuance of any building permit, applicant shall submit an energy efficiency calculation prepared using a standard Title 24, Chapter 6 software which demonstrates that the project exceeds Title 24, Chapter 6 energy efficiency standards by 15%, as such standards are in effect on the date the calculations are prepared, which calculation shall be certified by a licensed member of the design team for the project as reflecting the design and material choices embodied in the project plans. If the project plans are thereafter changed in a manner which could affect the energy efficiency of the project, as measured, the revised plans shall be accompanied by an updated calculation and certification.

4. Specific Items of the Staff Recommendation Rebutted or Noted.

A. Increased Service Needs Based on Planning Development Projection.

The Staff Recommendation and attached materials make abundantly clear the over-all increase in housing and needs for vital service which will occur not only in Area 46 but also throughout the Community Plan area. Page A-13 confirms that given that "age, condition and development potential of surrounding properties" the proposed project is compatible with probable future development. On a cumulative basis, this project must be considered with other development which is probable and Planning goes on to happily confirm that is several blocks of Venice Boulevard at least.

In fact, Planning has been kind enough to direct to us to resources which allow us to understand Planning's own predictions for Area 46 and, frankly, the Community Plan area. Specifically, the Housing Element 2013-2021, Chapter 3, provides an inventory of potential housing sites and a projection as to the conversion of the sites to housing.

<https://planning.lacity.org/HousingInitiatives/HousingElement/Text/Ch3.pdf>

At page 9, Chapter 3 states that

In Community Commercial areas with Height District 1 (FAR = 1.5:1) we assume that only 10% of the capacity of commercially-zoned sites in the inventory will be utilized for residential uses. In Community Commercial areas with FARs over 3:1 a 50% factor is used, while areas considered Regional Centers use 60%. Housing Element 2013-2021, Chapter 3.

Here by Planning's logic, essentially all of the commercial property on Venice Boulevard, in the Community Plan area, is within 1500 feet of a major transit stop (Metro 733 Rapid), fronts on a major highway and is eligible for 3:1 FAR under the City Affordable Housing Incentive Ordinance. Certainly, this logic holds for Area 46—generating the 50% conversion factor predicted in the “recycling” analysis filed with the appeal.

From here, however, the Staff Recommendation takes an illogical detour. They reason that because the projected 2015 demographics for Palms-Mar Vista- Del Rey only show 115,800 people in the Community Plan area as a whole—the addition of 3,000 new residents in the “recycling” is within the range of the Framework Element. This of course forgets all the large yellow dots, representing potential housing development, shown on page 5 of the Housing Element 2013-2021, Chapter 3, within the Community Plan area. I also attach as [Attachment 4](#), the page of the Staff Recommendation which shows the Palms-Mar Vista- Del Rey potential sites by street from the Housing Element 2013-2021, Exhibit H-18. There are potential housing sites clustered along Venice, Sawtelle, National, Motor and Overland. There is no reason to assume that only Venice Boulevard is probable for recycling—in fact the careful project list assembled by Planning provides a lead-off hitter on a number of the Community Plan commercial boulevards and demonstrates that the commercial boulevard areas in the Community Plan are all facing development. So it is illogical to assume that only Area 46 will recycle and place strain on the infrastructure. In addition, looking at the data the Planning Department so generously provided, there is a very high demand for housing in the Community Plan area with a 2.56% vacancy rate—making development in the Community Plan area desirable. Based on the Department of Building and Safety, PCIS in Square Feet for 7/1/2014-9/30/2015, this combination of demand and available potential housing sites has translated to 82 multi-family demolitions and 629 multi-family permits in the Community Plan area.

But, it's not the aggregate number of new residents in the “recycle” in the whole Community Plan area which is the real metric for whether there is a risk of essential service short-fall in any given portion of the Community Plan area. Rather it's what is projected to happen in the small 18.6 acre Area 46 which is significant. Here it is, according to Planning, probable that there will be sometime in the near future, approximately 3,000 new souls in Area 46, if mixed use development in excess of the 1:5 to 1 FAR set allowed. The Framework element plans in large aggregate, which is broken down into Community Plans, which is again broken down into Areas. Here we have an area of low intensity commercial development recycling to provide enough growth—by itself—to bring the Community Plan area up to the total residents predicted for 2010 which was the basis for the Framework Element assessment and service development.

B. Fire Letter

Which brings me back to harping on “fire services” as an example of a reasonable argument of potential substantial adverse impact to the environment and a health and safety risk which has not been adequately described to the decision maker and the public or mitigated.

The Fire Email dated February 21, 2017 between Mr. Robert Duff, LAFD Inspector, Hydrants & Access Unit, and Ms. Connie Chauv, of Los Angeles Planning, and the earlier Email addressed to “Terrance” at the LAFD dated February 14, 2017 prove my point. Attachment 5.

Initially, Ms. Chauv delivered the exact points raised in the appeals for comment on official fire department stationary to Terrance. Email February 14, 2017. Those points included sufficiency of fire services to accommodate the change in use (commercial to mixed use residential), the increased occupancy of Area 46 and the high rise nature of the building. Terrance did not respond so Ms. Chauv moved on to Mr. Duff with a much simpler request:

“Could you please confirm if the following mitigation measures in the MND are sufficient?”

XIV-10 Public Services (Fire)

- Environmental Impacts may result from the project implementation due to the location of the Project in an area having marginal fire protection facilities. However, this potential impact will be mitigated to a less than significant level by the following measure:

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway or an improved street or approved fire lane.

Now given that this mitigation begs the question and give the fire department control over the number of fire lanes, hydrant sufficiency and distance to the door of each dwelling, Mr. Duff could have chosen to make his life easy and simply say the mitigation is sufficient. BUT HE DOES NOT. . . Instead he says:

Upon further review by the LAFD Hydrants & Access Unit there are no additional comments regarding hydrants or access.

Issues regarding “piece meal” of projects along the corridor will be addressed in the future update of Community Plans.

So no, try as they might, the Planning Department could not get a statement that fire services for this building are sufficient or that “piece meal” of future projects in Area 46 without infrastructure does not need to be addressed. Mr. Duff politely signed off on hydrants—which he can ensure are sufficient when the building plans are submitted—and signed off on access-- which he can dictate at the time of the building permit and is not even confirming can be adequately achieved given the alley and travel distances to the unit doors. A minimal sign-off if there ever was one. Mr. Duffy also did not address the appropriateness of the height of the building and type of construction; the adequacy of response time; and the staffing levels required to address a fire in an 83’ building. On all these items, the only evidence in the record is that I submitted. What Mr. Duff also politely confirmed was the validity of concern with recycling/“piece meal” our way along in Area 46 or on the Venice “corridor” without a community plan update to address resource requirements.

The real thrust of this is very easily seen from the LAFD’s perspective if you look at Playa Vista Phase I. As of 2000, Playa Vista Phase I had 2,416 residents. To deal with this total impact and likely the larger Phase II to follow, the LAFD got a new \$25 million station adjacent to the project, equipment and staff. In-fill development, without a community plan and new infrastructure Framework Element, gives no such resource allocation opportunity. It gives the LAFD the people, the residences and the businesses but not the opportunity to allocate additional resources, including staff, equipment and facilities. So, all the calibration to make the system safe waits until the City finally does a new Community Plan.

C. Transit Use by Residents.

Planning was also kind enough to share the statistics which support appellants’ claims that the new residents of Area 46 will not use the provided mass transit in the documents which accompanied the Staff Recommendation. First, the rider numbers show a decline in riders for Metro Lines 33 and 733, Blue Bus Line 14 and Culver City Lines 2 and 5 between 2014 and 2016. Entirely consistent with our position. Second, only 6.5% of the plan area residents use public transportation—this despite the transit rich resources of the area. Third, the median income of an area resident is \$58,311, vastly in excess of the income of the average Metro rider who makes something like \$15,000+ as previously documented.

This matters because the ability of this project to reduce greenhouse gases and not swamp the community with circling cars looking to park—depends on mass transit adoption—which is not likely.

Very truly yours,



Kathryn M. Schwertfeger

cc: Ezra Gale, Esq. (w/attachments)

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January 20, 2016

Ms. Hasan Ikhata
Southern California Association of Governments
818 W. Seventh St., 12th Floor
Los Angeles, CA 90017

Dear Mr. Ikhata:

DRAFT 2016-2040 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The purpose of this letter is to provide comments from the City of Los Angeles Department of City Planning (DCP) regarding the Draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). DCP very much appreciates the collaborative relationship with SCAG in developing this plan, which included extensive cooperation from your staff on the integrated growth forecast and understanding the City's land use plans and programs. The Department has identified the following issues and recommends changes to the plan in order to better address the regional challenges faced in Southern California:

1. Include a greater emphasis on housing affordability as a key strategy to achieving plan goals;
2. Provide greater clarity in the discussion of gentrification and displacement
3. Provide greater clarity in terms of how local jurisdictions are to determine SCS Consistency of a given project

1. Include a greater emphasis on housing affordability as a key strategy to achieving plan goals

Given the severity of the housing affordability crisis faced by the region, and the direct impact unaffordability has on Plan goals such as mobility, air quality and economic well-being, the City of Los Angeles expected the housing topic to receive a higher overall profile throughout the report. When the topic was addressed in detail, it often did so in ways that may inadvertently be counter-productive to many of the Plan's goals.

SB 375, which established the requirement to create a sustainable communities strategy, is meant to better coordinate planning for transit and housing. Planning for housing is one of the primary purposes of the SCS. Three of the eight statutory requirements in Health and Safety Sec. 65080 (b)(2)(B) involve housing, including a consideration of the state housing goals and the identification of areas within the region sufficient to house "all the population of the region, including all economic segments of the population" as well as "an eight-year projection of the regional housing need for the region."

— See Next
Page
Continued —

It is not clear in the Plan how or where these housing-related requirements would be satisfied. The 2016 RTP/SCS acknowledges that the region only built 10% of the housing necessary for those with low incomes during the previous period and missed its targets for above moderate income households as well. The 8-year regional housing needs assessment for the SCAG region is for 412,000 new housing units, more than 270,000 of which are supposed to be affordable for those with moderate income or less. The SCS should help answer how and where the region should grow to ensure the housing needs of more are met and lead on the hard policy choices that need to be made around housing, particularly in this time of limited public funding.

Examples of an overall lack of focus on housing affordability includes:

- The list of nine 2016 RTP/SCS Goals (pg. 60) does not mention housing.
- The sections titled "What Will We Accomplish" and "How Will We Ensure Success" in the Executive Summary (pg. 8 and 9) do not mention any housing related goals.
- There is little discussion of how unaffordability undermines the goals of the RTP/SCS, including suburban sprawl, longer job commutes, higher vehicles mile travelled and greenhouse gas emissions, etc. While the Plan contains a statement that transit investments and strategies will be most effective if "coordinated with land use strategies such as TOD and providing affordable housing" (pg. 92), this discussion should occur earlier in the document and be expanded.
- The scale of the housing problem is not adequately addressed. For example, under the "Challenges We Face" section (pg. 3 - Executive Summary), the Plan summarizes the region's housing problems simply as: "Housing prices are increasing: Housing prices are rising steadily and affordability is declining..." This language simply fails to capture the magnitude of the crisis facing the region. The Los Angeles metro area not only has the lowest affordability rate in the country, but no area of the country has ever seen incomes and housing costs so out of whack as they are today in Los Angeles. When taking into account the high cost of housing, LA County has been recently identified as having the highest effective poverty rates in the State¹.
- The section titled "Our Progress Since 2012" does not mention the progress towards meeting the region's housing needs as expressed through the required Regional Housing Need Assessment (RHNA) allocation. Nor does it describe how past residential growth trends met prior goals. These are two of the primary components of the Sustainable Communities Strategy (per 65080 (b)(2)(B)). State legislation around housing funding is mentioned, but not other significant laws such as AB 2222 (2014) and AB 744 (2015).

2. Provide greater clarity in the discussion of gentrification and displacement

Demographic change is an important contributor to regional land use outcomes and equity concerns. The Department appreciates the Plan's interest and concern for the issues of gentrification and displacement, particularly in relation to areas around transit stations (e.g. pgs. 12, 54, 69,), and is grateful for the amount of data and research devoted to this complicated subject. We also agree with the assessment that jurisdictions need to be sensitive to this topic and work to employ strategies that mitigate potential negative impacts on communities.

Unfortunately, some of the discussion and conclusions on these topics, as presently worded, could be misconstrued or cause confusion about intended policy objectives, and potentially result in less housing affordability. Given the importance of the topic, the Department requests that the sections below be reconsidered.

- The definition of "displacement" in the Glossary may be partially responsible for potential confusion. The definition appears to refer only to a process that "drives out" existing

¹ http://www.ppic.org/main/publication_show.asp?i=261

residents and businesses. It does not include the (much more common) process whereby lower income residents become unable to access properties in certain areas due to increasing housing prices (often referred to as "exclusionary displacement"). This limited definition influences the discussion of the process and strategies to respond.

- There is an apparent disconnect between the evidence on gentrification presented in the Plan and some of the claims being made. The detailed study in the Environmental Justice Appendix found "no statistical significance" in the difference of demographic change occurring in transit-oriented areas of the SCAG region versus outside them. Despite this lack of evidence, the Plan often discusses new investment in transit-oriented communities as a cause for rising home prices and displacement (pgs. 3, 55, 163). This language needs to be carefully worded to avoid inadvertently undermining transit-oriented investment (such as transit infrastructure and housing) that is complementary to the Plan's objectives.
- The Environmental Justice Appendix relies on a variety of indicators to evaluate various equity issues in relation to Plan objectives like growth in transit-oriented communities (jobs-housing balance, median income, median rents, Hispanic population, etc.) We'd suggest adding some additional factors that are worthy of analysis and monitoring. These include cost burdens for renters and owners, transportation costs, the price of single-family homes versus condos and including Black and Asian households (in addition to Hispanic) in this metric.

3. Provide greater clarity on how local jurisdictions are to determine SCS Consistency of a given project

Increasingly, important areas of State land use and environmental policy are requiring a determination of "SCS consistency." Examples include the recent CEQA streamlining efforts mentioned in the Plan but also Cap and Trade mitigation funding, Enhanced Infrastructure Finance Districts and, analyzing greenhouse gases for CEQA purposes. The ability for a local jurisdiction to be able to accurately and efficiently establish whether a project, plan or program is consistent with the SCS has therefore gained prominence.

The current RTP/SCS is a high-level planning document that sets out transportation policies for the region, but does not provide specific policies for local agencies to use in advancing land use strategies. To the limited extent SCS consistency is discussed in the Plan, is the statement that "lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS" (for example, pg. 65 and throughout the SCS Background Documentation Appendix). This statement, unfortunately, does not provide much direction or clarity as to how local jurisdictions, or anyone else, should evaluate consistency with the SCS.

SCS consistency is an emerging area of state law without many precedents or interpretations. Other MPOs have provided guidance in their Plans, as well as separate consistency checklists, for their local jurisdictions. The current draft 2016 RTP/SCS offers insufficient information on which to base sound decisions. An unintended result is that projects, plans and programs in the SCAG region could be at a disadvantage with other regions.

As an example, SB 375 references project consistency (for Transit Priority Projects using CEQA streamlining) as whether or not the project matches the "general use designation, density, building intensity, and applicable policies specified for the project area in the SCS." We believe there are several issues associated with the Plan that make this task very difficult for local jurisdictions.

- 1) In order for a local jurisdiction to claim SCS consistency, it should be shown that a project or plan is in line with the "applicable policies" mentioned in the Plan. While six Land Use Strategies are presented in Chapter 5, the Plan does not clearly identify local policies that could advance its Policy Goals. Policies can be inferred from the Plan's text, but nowhere are they specifically identified or described. Although SB 375 does not empower SCAG to

impose its land use strategies or policies on its member local jurisdictions, SCAG can suggest or recommend the sorts of local policies that would advance the six Land Use Strategies at the local level. This would be useful to the city in its effort to promote the RTP/SCS's vision and benefit from the opportunities established under state law. As such, the utility of the 2016 RTP/SCS Land Use Strategies would be substantially improved by adding a discussion of "Supportive Local Policies" to the discussion of each in Ch. 5.

- 2) Within the 2016 RTP/SCS, two new concepts are introduced around the idea of creating "complete communities." They are "Livable Corridors," and "Neighborhood Mobility Areas." The discussion of Livable Corridors beginning on page 74 (Chapter 5) is an example of insufficient policy guidance. It states that "The Livable Corridor Strategy *specifically advises* local jurisdictions to plan and zone for increased density at key nodes along the corridor and replacement of single-story under-performing strip retail with well-designed higher density housing and employment centers." (emphasis added) Similarly, the discussion of Neighborhood Mobility Areas that follows states that: "The Neighborhood Mobility Areas strategy represents *a set of state and local policies* to encourage the use of active and other non-automotive modes of transportation, particularly for short trips in many suburban areas..." (emphasis added). Unfortunately, the Department does not see that any such advice is actually provided, nor are any state and local policies identified in the RTP/SCS. Further, there are no maps nor figures in the RTP/SCS that identify Livable Corridors or Neighborhood Mobility Areas. Without maps, the city cannot readily determine where Livable Corridors or Neighborhood Mobility Areas are located (or should be located) within its jurisdiction, limiting its ability to apply these strategies. Exhibits to illustrate the general locations of Livable Corridors and Neighborhood Mobility Areas would be helpful.
- 3) Although not explicit in the RTP/SCS, the City of Los Angeles understands the 2040 "Forecasted Regional Development Types" maps" found in the Background Documentation Appendix (Exhibits 1-33) are to be used in determining whether a project is consistent with the SCS. There are 2012 (baseline) and 2040 (proposed plan) maps for each geographic subregion. A SCS consistency argument for a project should show that a project or plan is aligned with the general use category and density and intensity shown on the 2040 maps. Unfortunately, the Development Type maps for the City of Los Angeles (Exhibit 13 and 14) are presented at such a scale to make them largely illegible from a user's perspective. It simply is not possible to make an accurate determination in what color (i.e. Development Type designation) a given site in the City is located within. As such, the City respectfully requests the following:
 - a. The Development Type maps shown for the City of Los Angeles (and perhaps any other geography of a similar large scale) should be broken up into zoomed-in sub-regional quadrants, or at least be made available to local jurisdictions that request them.
 - b. Development Type maps should contain additional information such as major streets and transit lines to help orient users.
 - c. Even when the correct Development Type can be understood for a given parcel, it is unclear how exactly to interpret such information as to general use, density and intensity. There does not appear to be a guide that translates the three Development Types (Urban, Compact, Standard) into use categories or density and intensity ranges. As far as we can tell, there is only a paragraph description of each of these critical SCS designations (pg. 20 of the Plan). Through use of the Scenario Planning Model, Place Types are the foundation of the forecasted Development Types maps. Place Types do have uses, densities and intensities expressed in a usable manner in the Plan, however local jurisdictions don't have ready access to the information. Therefore, background data on Development Type, including the underlying Place Type should be provided to local jurisdictions

- that request it. The information would remain advisory in nature, but could be helpful in supporting a SCS consistency analysis in many critical instances. In addition, more information to translate the three Development Type categories into use categories or density and intensity ranges.
- d. It is unclear how gradations between each Development Type category should be treated (e.g. the orange color between Urban red and Compact yellow). The gradations effectively create five Development Type categories, two of which are completely undefined.
- 4) The footnote at the bottom of each Development Type map in the SCS Background Documentation Appendix (Exhibits 1-3) raises several questions and concerns.
 - a. One sentence in the footnote says "Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS." While the Department understands the meaning, this sentence could be read as meaning that the Development Type maps, which are based on the TAZ level data, should not be used as part of establishing SCS consistency. When combined with a lack of other direction in the Plan, the phrase may raise unnecessary confusion.
 - b. Another sentence in the footnote says "For the purpose of determining consistency for California Environmental Quality Act (CEQA) streamlining, lead agencies have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS." This sentence should be broadened to include the increasingly diverse areas of state policy that references SCS consistency.
 - 5) The 2016 RTP/SCS Plan appears to use three different terms to refer to the same thing. The Plan uses the term "Development Category", to refer to the Urban Compact and Standard designations, while the SCS Background Documentation Appendix uses the terms "Development Type" on the maps and "Land Development Category." This should be reconciled to avoid confusion.
 - 6) To address many of these concerns, SCAG could create a "SCS Consistency" section of the plan. Key factors should include means to interpret consistency with Development Type maps, a list of key GHG-related policies, a list of relevant SCS EIR GHG mitigation measures, and quantitative analysis that a project does not conflict with the GHG reduction target with the county or region where relevant. Other metropolitan planning organizations have created "SCS Consistency Checklists" and other more helpful information to guide decision-makers.

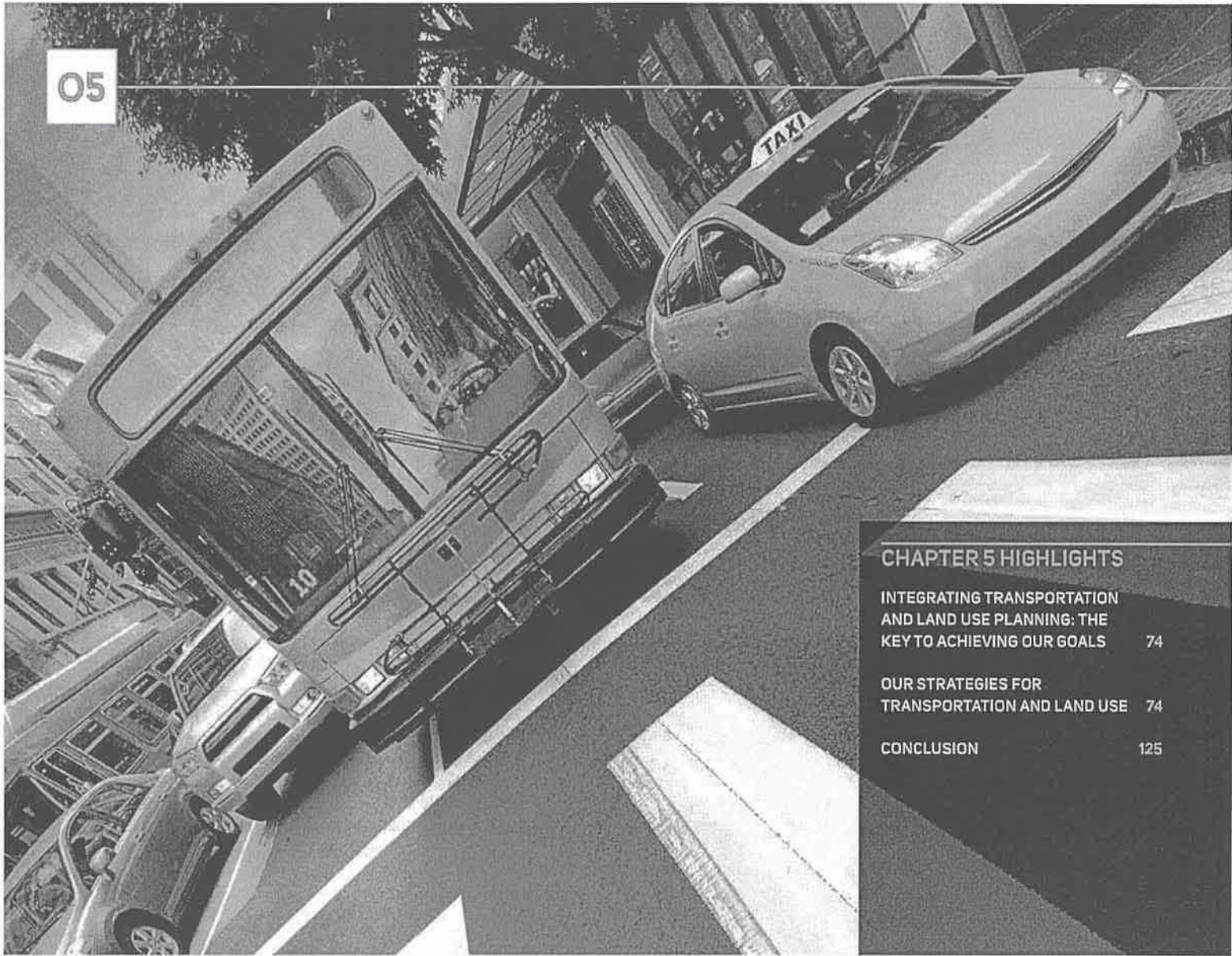
Thank you for this opportunity to provide comments. If you have any questions or would like additional information, please contact Matthew Glesne at (213) 978-2666 or by email at Matthew.Glesne@lacity.org.

Sincerely,

for 

MICHAEL J. LOGRANDE
Director of Planning

05



CHAPTER 5 HIGHLIGHTS

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THE ROAD TO GREATER MOBILITY & SUSTAINABLE GROWTH

At the beginning of Chapter 1, we reviewed several themes that resonate throughout the 2016 RTP/SCS. The first of these was: *"Integrating strategies for land use and transportation."* This is SCAG's overarching strategy for achieving its goals of regional economic development, maximized mobility and accessibility for all people and goods in our region, safe and reliable travel, a sustainable regional transportation system, a protected natural environment, health for our residents, and more.

INTEGRATING TRANSPORTATION AND LAND USE PLANNING: THE KEY TO ACHIEVING OUR GOALS

By integrating our strategies for transportation with our strategies for using land—in other words, considering in tandem how we grow and how we get around—we can build the communities that we want. Planning that does not strive for this close integration can result in sprawling suburbs connected haphazardly to poorly managed highways and isolated communities that lack easy access to public transportation connecting people from home to work, school and other destinations. Precious resources are squandered: time, energy, money, productivity, clean air and good health, among others.

As the region's transportation planning agency, SCAG has long promoted the concept of integrating transportation planning and land use planning. Since 2002, with the Southern California Compass and Shared Growth Vision for the region and the subsequent Compass Blueprint program (now the Sustainability Planning Grant Program), SCAG has promoted integrated planning tools for local governments that want their residents to have more mobility options, make their communities more livable, increase prosperity among all people and strive for sustainability. Subsequent policies adopted at the regional level in 2004, 2008 and 2012 have supported and advanced the integration of transportation and land use planning.

With the passage of Senate Bill 375 in 2008, the State of California formalized the idea of integrating planning statewide when the California Air Resources Board (ARB) set regional targets for reducing greenhouse gas emissions and required every Metropolitan Planning Organization (MPO) in the state to develop an SCS that charted a course toward reduced emissions and a more sustainable future. A central tenet of the SCS requirement is for MPOs to integrate land use and transportation planning.

Here is one example: High Quality Transit Areas (HQTAs) are places where people live in compact communities and have ready access to a multitude of safe and convenient transportation alternatives to driving alone—including walking and biking, taking the bus, light rail, commuter rail, the subway and/or shared mobility options. Along high quality bus corridors, for instance, a bus arrives at least every 15 minutes. Residential and commercial development is integrated with plans for transit, active transportation and other alternatives to driving alone.

The integrated strategies, programs and projects reviewed in this chapter are designed to improve a region with very specific changes underway: Over the next 25 years, our region's population is projected to grow by more than 20 percent, from about 18 million people to more than 22 million people. Diverse households will reside in all types of communities, including urban centers, cities, towns, suburban neighborhoods and rural areas. Much of the region will continue to be populated by households living in detached single-family dwellings located in lower-density suburban areas. However, 67 percent of new residences will be higher density multifamily housing, built as infill development within HQTAs. Households will demand more direct and easier access to jobs, schools, shopping, healthcare and entertainment, especially as Millennials mature and seniors grow in number. Concurrently, our Southern California region will remain a vital gateway for goods and services, an international center for innovation in numerous industries and a place that offers its residents a high standard of living. We know that our future growth will add new pressures to our transportation system and to our communities. However, through long-term planning that integrates strategies for transportation and land use, we can ensure that our region grows in ways that enhance our mobility, sustainability and quality of life.

OUR STRATEGIES FOR TRANSPORTATION AND LAND USE

In the discussion that follows, transportation and land use strategies are grouped separately, but it will nevertheless become clear how closely they are related to one another. The section that follows is the heart of the 2016 RTP/SCS, and by the end of the chapter our region's course toward a more mobile and sustainable future should be evident.

Serving as an MPO, Regional Transportation Planning Agency and Council of Governments, SCAG has an essential responsibility to develop an RTP/SCS that is dedicated to detailing recommended regional transportation investments and strategies. The agency has developed these transportation strategies in the context of how we are projected to grow and live as a region in coming decades. In this chapter we will first review regional strategies for growth and land use and then move into a comprehensive review of the agency's plans for the region's multi-faceted transportation system.

LAND USE STRATEGIES

The land use strategies included in this Plan are built on a foundation of contributions from communities, cities, counties and other local agencies across our region. The land use patterns reviewed here, for example, are based on local general plans as well as input from local governments. For this Plan update, SCAG was committed to preserving the growth forecasts provided by local jurisdictions at the jurisdictional level.

At the same time, Senate Bill 375 requires that SCAG, as the region's MPO, strive to develop a vision of regional development patterns that integrate with and support planned transportation investments. As part of that mandate, an overall land use pattern has been developed that respects local control, but also incorporates best practices for achieving state-mandated reductions in greenhouse gas emissions through decreases in per capita vehicle miles traveled (VMT) regionally.

2016 RTP/SCS LAND USE POLICIES

The 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS. These foundational policies, which have guided the development of this Plan's strategies for land use, are:

- Identify regional strategic areas for infill and investment
- Structure the plan on a three-tiered system of centers development¹
- Develop "Complete Communities"
- Develop nodes on a corridor
- Plan for additional housing and jobs near transit
- Plan for changing demand in types of housing
- Continue to protect stable, existing single-family areas
- Ensure adequate access to open space and preservation of habitat
- Incorporate local input and feedback on future growth.

2016 RTP/SCS LAND USE STRATEGIES

For this Plan, land use strategies are described in this section.

¹ Complete language: "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pps. 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.

Reflect The Changing Population And Demands

The SCAG region, home to about 18.3 million people in 2012, currently features 5.9 million households and 7.4 million jobs. By 2040, the Plan projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. HOTAs will account for three percent of regional total land, but will accommodate 46 percent and 55 percent of future household and employment growth respectively between 2012 and 2040. The 2016 RTP/SCS land use pattern contains sufficient residential capacity to accommodate the region's future growth, including the eight-year regional housing need, as shown in TABLE 5.1. The land use pattern accommodates about 530,000 additional households in the SCAG region by 2020 and 1.5 million more households by 2040. The land use pattern also encourages improvement in the jobs-housing balance by accommodating 1.1 million more jobs by 2020 and about 2.4 million more jobs by 2040.

This 2016 RTP/SCS reflects a continuation of the shift in demographics and household demand since 2012. This shift is apparent in the land use development pattern, which assumes a significant increase in small-lot, single-family and multifamily housing that will mostly occur in infill locations near bus corridors and other transit infrastructure. In some cases, the land use pattern assumes that more of these housing types will be built than currently anticipated in local General Plans. This shift in housing type—especially the switch from large-lot to small-lot single-family homes—is already occurring as developers respond to new demands. In 2008, 45 percent of all housing units were multifamily homes. From 2012 through 2040, the Plan projects that 66 percent of the 1.5 million new homes expected to be built in the SCAG region will be multifamily units, reflecting demographic shifts and anticipated market demand. This will result in an increase of multifamily units in the region to 49 percent of all housing units in the region.

Combating Gentrification and Displacement

The 2012 RTP/SCS discussed strategies to combat gentrification and displacement, a continuing challenge that we discussed in Chapter 3. Jurisdictions in the SCAG region should continue to be sensitive to the possibility of gentrification and work to employ strategies to mitigate its potential negative community impacts. Generally, the SCAG region will benefit from higher-density infill development, which means that neighborhoods will be adding to the local housing stock rather than maintaining the current stock and simply changing the residential population. In addition, local jurisdictions are encouraged to pursue the production of permanent affordable housing through deed restrictions or development by non-profit developers, which will ensure that some units will remain affordable to lower-income households. SCAG will

work with local jurisdictions and community stakeholders to seek resources and provide assistance to address possible gentrification impacts of new development on existing communities and vulnerable populations.

Focus New Growth Around Transit

The 2016 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's HQTAs (see EXHIBIT 5.1). While maintaining jurisdictional totals, the overall land use pattern moves new development from areas outside of HQTAs into these areas. SCAG incorporated land use plans provided by local jurisdictions into this pattern. While many residents and employees within half a mile of a transit stop or corridor can walk or bike to transit, not all of these areas are targeted for new growth and/or land use changes. The 2016 RTP/SCS assumes that 46 percent of new housing and 55 percent of new employment locations developed between 2012 and 2040 will be located within HQTAs, which comprise only three percent of the total land area in the SCAG region. Since adoption of the 2012 RTP/SCS, jurisdictions have referenced HQTAs in their planning documents and have positioned themselves to compete for California's Cap-and-Trade auction proceeds to support Transit Oriented Development (TOD) and active transportation infrastructure.

HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, avoid greenfield development, create local jobs, and have the potential to improve public health and housing affordability. Here, households have expanded transportation choices with ready access to a multitude of safe and convenient transportation alternatives to driving alone—including walking and biking, taking the bus, light rail, commuter rail, the subway and/or shared mobility options. Households have more direct and easier access to jobs, schools, shopping, healthcare and entertainment, especially as Millennials form households and the senior population increases. Moreover, focusing future growth in HQTAs can provide expanded housing choices that nimbly respond to trends and market demands, encourage adaptive reuse of existing structures, revitalize main streets and increase Complete Street investments.

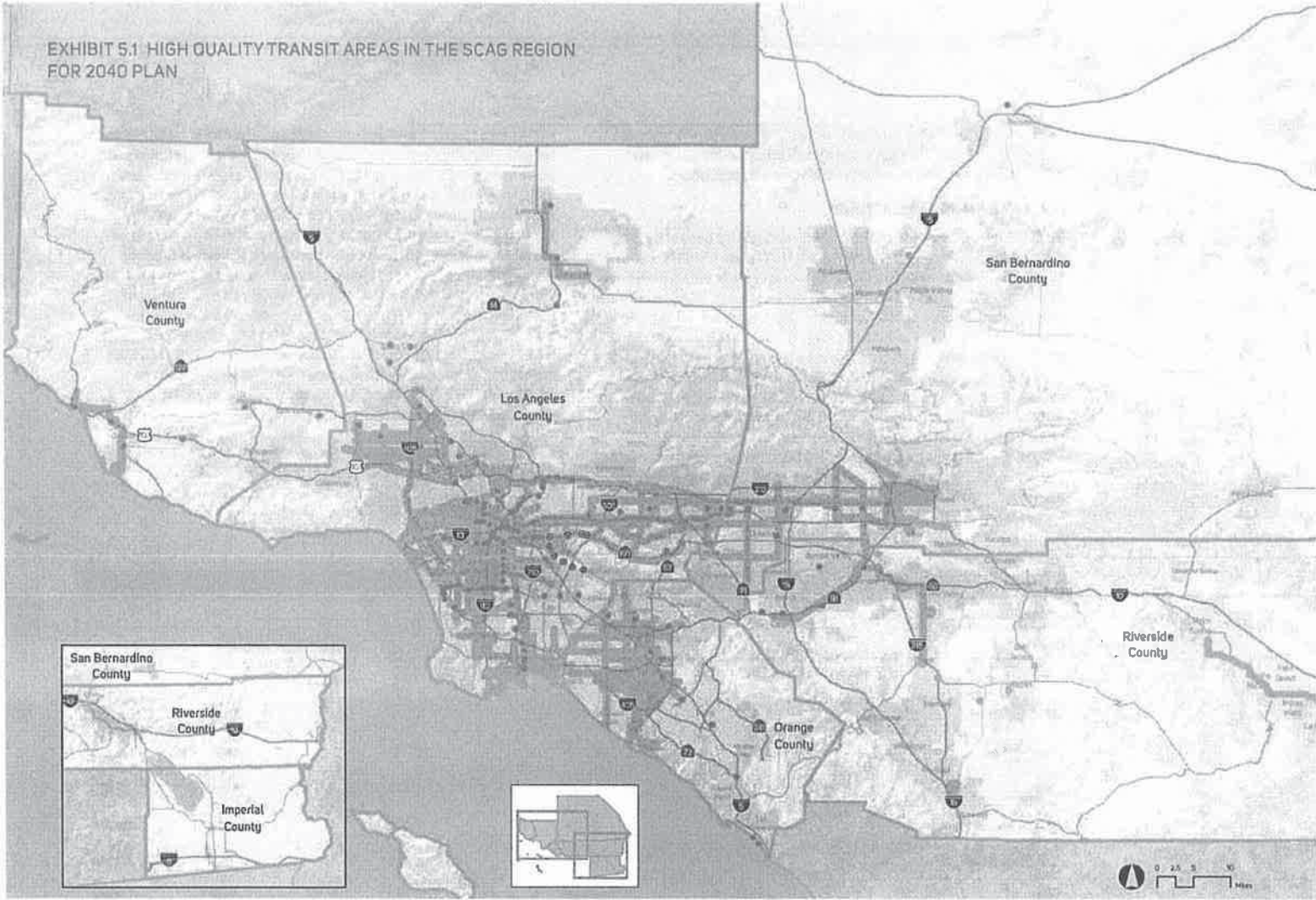
Additional local policies that ensure that development in HQTAs achieve the intended reductions in VMT and greenhouse gas emissions include:

TABLE S1 REGIONAL HOUSING NEEDS ASSESSMENT, ADOPTED 2012

Projection period 2014–2021

COUNTY	NUMBER OF VERY LOW INCOME HOUSEHOLDS	NUMBER OF LOW INCOME HOUSEHOLDS	NUMBER OF MODERATE INCOME HOUSEHOLDS	NUMBER OF ABOVE MODERATE INCOME HOUSEHOLDS	TOTAL
Imperial	4,194	2,553	2,546	7,258	16,551
Los Angeles	45,672	27,469	30,043	76,697	179,881
Orange	8,734	6,246	6,971	16,015	37,966
Riverside	24,117	16,319	18,459	42,479	101,374
San Bernardino	13,399	9,265	10,490	24,053	57,207
Ventura	4,516	3,095	3,544	8,003	19,158
SCAG	100,632	64,947	72,053	174,505	412,137

EXHIBIT 5.1 HIGH QUALITY TRANSIT AREAS IN THE SCAG REGION FOR 2040 PLAN



High Quality Transit Areas (including rail stations and qualifying bus corridors, see glossary for definition)

-
-
-

(Source: SCAG)

- Affordable housing requirements
- Reduced parking requirements
- Adaptive reuse of existing structures
- Density bonuses tied to family housing units such as three- and four-bedroom units
- Mixed-use development standards that include local serving retail
- Increased Complete Streets investments around HQTAs. Complete Streets are streets designed, funded and operated to enable safe access for roadway users of all ages and abilities, including pedestrians, bicyclists, motorists and transit riders.

The State of California is also trying to encourage growth around transit with the passage of Senate Bill 743 (SB 743), which seeks to facilitate transit-oriented projects in existing urbanized areas. The bill creates a new exemption from CEQA for certain projects that are residential or employment centers or mixed-used projects located within a Transit Priority Area (TPA), a part of a specific plan with a certified EIR and consistent with the SCS or APS.

Transit Oriented Development, HQTAs and Local Air Quality Impacts

The 2016 RTP/SCS recognizes guidance from the 2005 ARB air quality manual, which recommends limiting the siting of sensitive uses within 500 feet of highways and urban roads carrying more than 100,000 vehicles per day. This ARB guidance is carefully applied in areas that support Transit Oriented Development. Less than 10 percent of HQTAs planned in the 2016 RTP/SCS would fall within 500 feet of highways and highly traveled corridors, according to geographic information system (GIS) analyses. While density is increased in some areas of HQTAs, growth remains constant in areas within 500 feet of highways and urban roads to reflect local input, thereby balancing the growth distribution.

Plan for Growth Around Livable Corridors

The Livable Corridors strategy seeks to revitalize commercial strips through integrated transportation and land use planning that results in increased economic activity and improved mobility options. Since 2006, SCAG has provided technical assistance for 19 planning efforts along arterial roadway corridors. These corridor planning studies focused on providing a better understanding of how corridors function along their entire length. Subsequent research has distinguished the retail density and the specific kinds of retail needed to make these neighborhood nodes destinations for walking and biking.

From a land use perspective, Livable Corridors strategies include a special emphasis on fostering collaboration between neighboring jurisdictions to encourage better planning for various land uses, corridor branding, roadway improvements and focusing retail into attractive nodes along a corridor.

Livable Corridors Network

SCAG identified 2,980 miles of Livable Corridors along arterial roadways discussed in corridor planning studies funded through the Sustainability Planning Grant program and along enhanced bus transit corridors identified by regional partners. However, the land use strategies proposed in the 2016 RTP/SCS are not tied to a specific corridor. Livable Corridors are predominately a subset of the HQTAs, however 154 miles are not designated as HQTAs. These miles were identified in Sustainability Planning Grant projects and are proposed for active transportation improvements and the land use planning strategies described below.

Livable Corridors Strategies

The Livable Corridors concept combines three different components into a single planning concept to model the VMT and greenhouse gas emission reduction benefits:

- **Transit Improvements:** The associated county transportation commissions (CTCs) have identified some of these corridors for on-street, dedicated lane Bus Rapid Transit (BRT) or semi-dedicated BRT-light. The remaining corridors have the potential to support other features that improve bus performance. These other features include enhanced bus shelters, real-time travel information, off-bus ticketing, all door boarding and longer distances between stops to improve speed and reliability.
- **Active transportation Improvements:** Livable Corridors should include increased investments in Complete Streets to make these corridors and the intersecting arterials safe for biking and walking.
- **Land use policies:** Livable Corridor strategies include the development of mixed-use retail centers at key nodes along the corridors, increasing neighborhood-oriented retail at more intersections and zoning that allows for the replacement of under-performing auto-oriented strip retail between nodes with higher density residential and employment. These strategies will allow more context sensitive density, improve retail performance, combat blight and improve fiscal outcomes for local communities.

Provide More Options For Short Trips

Thirty-eight percent of all trips in the SCAG region are less than three miles. The 2016 RTP/SCS includes land use strategies, Complete Streets Integration and a set of state and local policies to encourage the use of alternative modes of transportation for short trips in new and existing Neighborhood Mobility Areas (NMAs) and Complete Communities. In addition to the active transportation strategies that will be discussed below, land use strategies include pursuing local policies that encourage replacing motor vehicle use with Neighborhood Electric Vehicle (NEV) use. NEVs are a federally designated class of passenger vehicle rated for use on roads with posted speed limits of 35 miles per hour or less.

Neighborhood Mobility Areas

NMAs have a high intersection density, low to moderate traffic speeds and robust residential retail connections. These areas are suburban in nature, but can support slightly higher density in targeted locations. The land use strategies include shifting retail growth from large centralized retail strip malls to smaller distributed centers throughout an NMA. This strategy has shown to improve the use of active transportation or NEVs for short trips. Steps needed to support NEV use include providing state and regional incentives for purchases, local planning for charging stations, designating a local network of low speed roadways and adopting local regulations that allow smaller NEV parking stalls. NMAs are applicable in a wide range of settings in the SCAG region. The strategies associated with this concept are intended to provide sustainable transportation options for residents of the region who do not have convenient access to high-frequency transit options.

Complete Communities

Development of "complete communities" can provide households with a range of mobility options to complete short trips. The 2016 RTP/SCS supports the creation of these mixed-use districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other. Focusing a mix of land uses in strategic growth areas creates complete communities wherein most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.

Support Local Sustainability Planning

To implement the SCS, SCAG supports local planning practices that help lead to a reduction of greenhouse gas emissions. Many local governments in the SCAG region serve as models for implementing the SCS. Sustainable Planning & Design, Zoning Codes and Climate Action Plans are three methods that local agencies have been adopting and implementing to help meet the regional targets for greenhouse gas emission reductions outlined in the SCS.

Sustainable Planning & Design

Many of the local policy documents that SCAG has reviewed are based on best practices that encourage infill and mixed-use development. Mixed-use design guidelines embrace and encourage increased densities and a mixing of uses, while also reflecting community character. For example, numerous suburban specific plans in the SCAG region encourage the revitalization of traditional main streets, downtowns and corridors. Other plans provide guidance for converting single-use office parks and industrial districts into mixed employment, retail and residential districts.

Sustainable Zoning Codes

Many cities and counties in the SCAG region have adopted form-based zoning codes that are tailored to local conditions, such as specifying building size and design parameters but allowing for more flexibility regarding use. Moreover, several cities and counties are updating their zoning codes to make development standards more environmentally friendly and equitable. One example is the City of San Gabriel's "Greening the Code" strategy, which identifies ways for the city's existing development code to facilitate more sustainability. New policies can involve coordinating landscaping practices with water conservation, best management practices for stormwater management and capture, creating better pedestrian connectivity, allowing more flexibility for mixed-use development and promoting energy efficient designs.

Climate Action Plans

SCAG is supporting several local governments throughout the region in the formation of Climate Action Plans (CAP). CAPs outline strategies for reducing greenhouse gas emissions in a cost effective manner. This is done by creating greenhouse gas inventories so that local governments can efficiently target their emission reduction practices to sources that pollute the most. Strategies outlined by CAPs in the SCAG region include Green Building guidelines for municipal buildings and facilities, implementing public electric vehicle charging stations and establishing energy retrofit incentive programs for residents.

2016 RTP/SCS Strategy

LIVABLE CORRIDORS

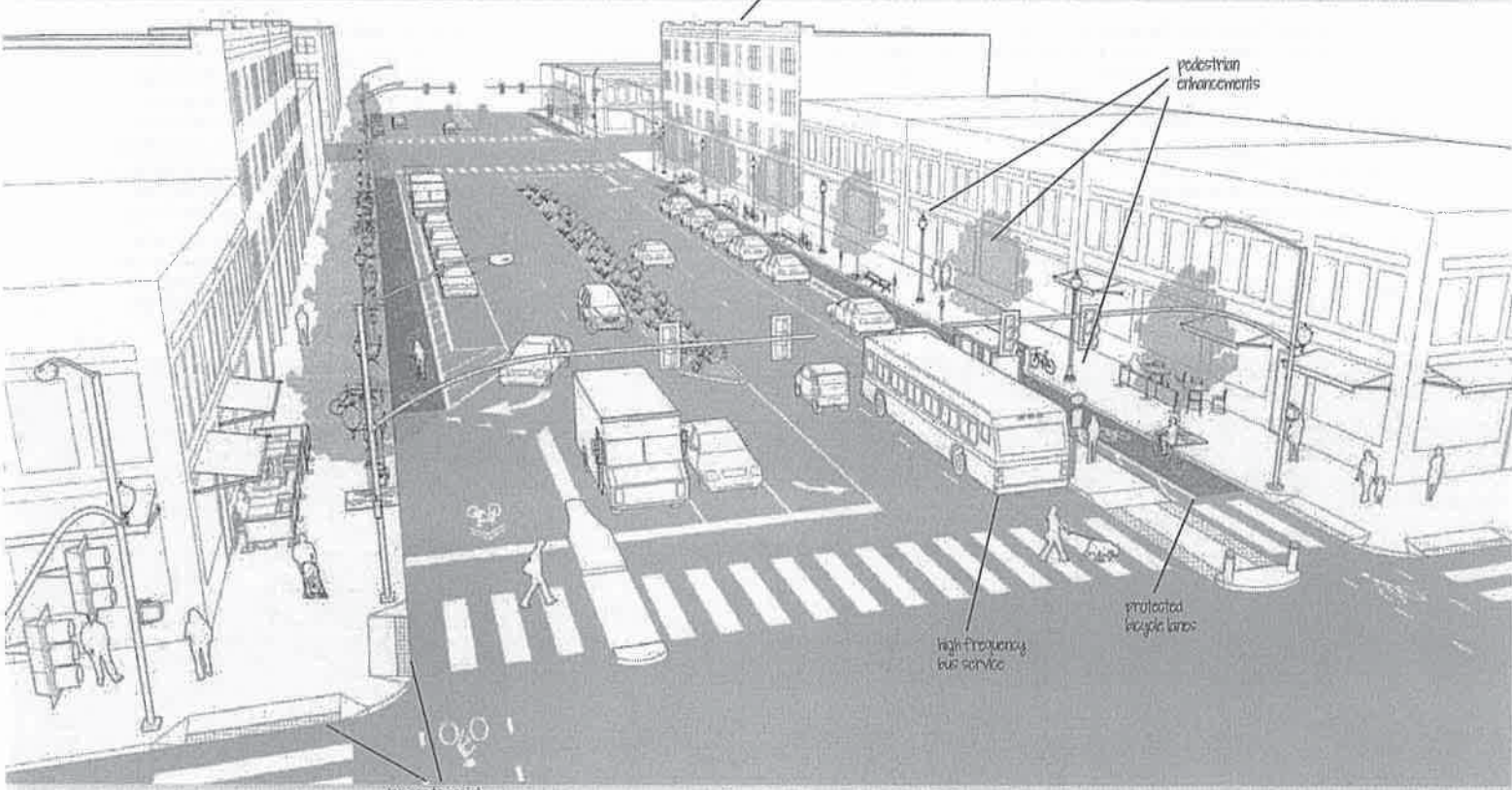
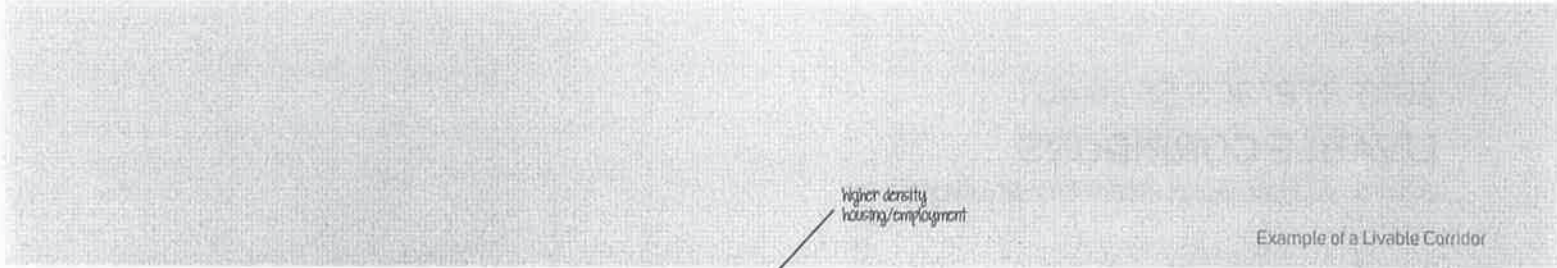
Enhancing the Connection Between Transit and Land Use

The SCAG region is crisscrossed by long arterial corridors, many of which are a legacy of Spanish colonial routes that linked the early missions and post-colonial ranchos. The suburban communities that developed rapidly after World War II were formed between these corridors, on a large (often one square mile) grid system. The Inland portions of the South Bay, the Gateway Cities, the San Fernando and San Gabriel valleys, as well as the northern portions of Orange County follow this pattern. SCAG's Livable Corridors Strategy considers these suburban development patterns and proposes to encourage development along the boulevards that not only serve as major travel routes, but also destinations.

As the region transitions to higher investments in infill development and high quality, high frequency transit, these arterials are well suited to connect the region. The Livable Corridor Strategy specifically advises local jurisdictions to plan and zone for increased density at key nodes along the corridor and replacement of single-story under-performing strip retail with well-designed higher density housing and employment centers. This development along key corridors, when coordinated with improvements to the frequency and speed of buses along the corridors, will make transit a more convenient and viable option. Additionally, enhanced roadway designs to accommodate active transportation will also increase the vibrancy along these boulevards.

Several important transit investments in the SCAG region will help encourage this land use strategy. The Santa Ana Harbor Blvd Specific Plan incorporates the improved Orange County Transportation Authority (OCTA) Bravol Route 543 and the planned OC Streetcar into its vision of the future. In Rancho Cucamonga, the City received a SCAG grant to reconcile the various specific plans along Foothill Blvd in anticipation of a future extension of the Omnitrans SbX. Across Los Angeles County, the Los Angeles County Metropolitan Transportation Authority (Metro) is planning for a high frequency network of buses with fewer stops. And the City of Los Angeles incorporated a "Transit Enhanced Network" as part of its General Plan Mobility Element to complement these investments.





2016 RTP/SCS Strategy

NEIGHBORHOOD MOBILITY AREAS

Encouraging Active Transportation for Short Trips

About 38 percent of all trips in the region are three miles or less. That is a short enough distance that can be covered by walking or biking, but more than 78 percent of these trips are made by driving. While convenient, driving for short trips can cause unnecessary congestion and pollution. What can be done to make it more convenient for people to walk, bike or even skate instead of driving, when practical?

The Neighborhood Mobility Areas strategy represents a set of state and local policies to encourage the use of active and other non-automobile modes of transportation, particularly for short trips in many suburban areas in Southern California developed between the late 1890s and the early 1960s. These suburban developments

often were designed for streetcars and walking, in addition to automobiles and are characterized by small to medium lot single-family homes, a denser grid network of local roads, a higher density of intersections and accessibility to neighborhood retail establishments. By employing Complete Streets strategies, such as bike lanes, roundabouts, wider sidewalks or better lighting, the neighborhood design could encourage a return to greater active transportation use for those short trips. Similarly, planning a connected network of dedicated lanes and roadways with speed limits 35 mph and under can encourage more use of Neighborhood Electric Vehicles (NEV) for short trips. NEVs produce negligible greenhouse gas emissions (based on energy production) and zero local

pollution. In addition, NEVs take up less roadway capacity, less parking area at both the origin and destination and reduce the probability of an injury or fatality in the event of a collision with a pedestrian or bicyclist.

The Neighborhood Mobility Area concept is not new. Across the country, they are referred to as streetcar suburbs, first generation suburbs or suburban villages. But its application here in Southern California, when coupled with the renaissance some parts of the region are experiencing with transit and active transportation, would provide residents with greater mobility choices and an alternative to driving short distances.



Example of a Neighborhood Mobility Area



Image courtesy of National Association of City Transportation Officials

SUSTAINABILITY

SUSTAINABLE COMMUNITIES STRATEGY (SCS) BACKGROUND DOCUMENTATION

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

2016
2040 **RTPSCS**

APPENDIX
ADOPTED | ARRIL 2016

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APPENDIX

SUSTAINABILITY | SUSTAINABLE COMMUNITIES STRATEGY
(SCS) BACKGROUND DOCUMENTATION

ADOPTED 1 MARCH 2016

SCS BACKGROUND DOCUMENTATION

SCS REQUIREMENTS MATRIX

The passage of California Senate Bill 375 (SB 375) in 2008 requires that a Metropolitan Planning Organization such as SCAG prepare and adopt a Sustainable Communities Strategy (SCS) that sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures, and policies, will reduce greenhouse gas emissions from automobiles and light duty trucks (Govt. Code §65080(b)(2)(B)). The SCS outlines certain land use growth strategies that provide for more integrated land use and transportation planning, and maximize transportation investments. The SCS is intended to provide a regional land use policy framework that local governments may consider and build upon. The following matrix outlines the statutory requirements of a SCS and where the requirements are addressed in both the 2012 RTP/SCS and the 2016 RTP/SCS.

TABLE 1 SCS Requirements Matrix

Required Element	Reference (2012)	Reference (2016)
California Government Code (CGC) Section 65080(b)(2)(B): Each metropolitan organization shall prepare a sustainable communities strategy, subject to the requirements of Part 450 of Title 23 of, and Part 93 of Title 40 of, the Code of Federal Regulations, including the requirement to utilize the most recent planning assumptions considering local General Plans and other factors.	2012–2035 RTP/SCS Chapter 4: Sustainable Communities Strategy	2016–2040 RTP/SCS Chapter 5: The Road to Greater Mobility and Sustainable Growth 2016–2040 RTP/SCS Appendix: SCS Background Documentation
CGC Section 65080(b)(2)(B)(i): Identify the general location of uses, residential densities, and building intensities within the region	2012–2035 RTP/SCS Chapter 4: Sustainable Communities Strategy 2012–2035 RTP/SCS Appendices: SCS Background Documentation; Growth Forecast	2016–2040 RTP/SCS Appendices: SCS Background Documentation; Demographics and Growth Forecast
CGC Section 65080(b)(2)(B)(ii): Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth	2012–2035 RTP/SCS Chapter 4: Sustainable Communities Strategy 2012–2035 RTP/SCS Appendices: SCS Background Documentation; Growth Forecast	2016–2040 RTP/SCS Appendices: SCS Background Documentation; Demographics and Growth Forecast
CGC Section 65080(b)(2)(B)(iii): Identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584	2012–2035 RTP/SCS Chapter 4: Sustainable Communities Strategy 2012–2035 RTP/SCS Appendix: SCS Background Documentation	2016–2040 RTP/SCS Appendices: SCS Background Documentation; Demographics and Growth Forecast
CGC Section 65080(b)(2)(B)(iv): Identify a transportation network to service the transportation needs of the region	2012–2035 RTP/SCS Chapter 4: Sustainable Communities Strategy; Chapter 2: Transportation Investments	2016–2040 RTP/SCS Chapter 5: The Road to Greater Mobility and Sustainable Growth

TABLE 1 SCS Requirements Matrix: continued

Required Element	Reference (2012)	Reference (2016)
CGC Section 65080(b) (2)(B)(v): Gather and consider the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of Section 65080.01	2012-2035 RTP/SCS Chapter 4: Sustainable Communities Strategy; Chapter 2: Transportation Investments	2016-2040 RTP/SCS Appendix: Natural Lands
CGC Section 65080(b) (2)(B)(vi): Consider the state housing goals specified in Sections 65580 and 65581	2012-2035 RTP/SCS Chapter 4: Sustainable Communities Strategy 2012-2035 RTP/SCS Appendix: SCS Background Documentation	2016-2040 RTP/SCS Appendix: SCS Background Documentation
CGC Section 65080(b) (2)(B)(vii): Set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board	2012-2035 RTP/SCS Chapter 4: Sustainable Communities Strategy; Chapter 5: Measuring Up 2012-2035 RTP/SCS Appendices: Transportation Conformity Analysis; Performance Measures	2016-2040 RTP/SCS Chapter 5: A Plan for Mobility, Sustainability and a High Quality of Life, Chapter 8: Measuring Our Progress for the Future 2016-2040 RTP/SCS Appendices: SCS Background Documentation; Transportation Conformity Analysis
CGC Section 65080(b) (2)(B)(viii): Allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506)	2012-2035 RTP/SCS Chapter 4: Sustainable Communities Strategy 2012-2035 RTP/SCS Appendix: Transportation Conformity Analysis	2016-2040 RTP/SCS Appendix: Transportation Conformity Analysis
CGC Section 65080(b) (2)(D) The metropolitan planning organization shall conduct at least two informational meetings in each county within the region for members of the board of supervisors and city councils on the sustainable communities strategy and alternative planning strategy.	2012-2035 RTP/SCS Chapter 6: Public Participation Plan 2012-2035 RTP/SCS Appendix: Public Participation and Consultation	2016-2040 RTP/SCS Appendix: Public Participation and Community Consultation
CGC Section 65080(b) (2)(E) Each metropolitan planning organization shall adopt a public participation plan, for development of the sustainable communities strategy and an alternative planning strategy, if any, that includes the following:	2012-2035 RTP/SCS Chapter 6: Public Participation Plan 2012-2035 RTP/SCS Appendix: Public Participation and Consultation	2016-2040 RTP/SCS Appendix: Public Participation and Community Consultation

TABLE 1 SCG Requirements Matrix: continued

Required Element	Reference (2012)	Reference (2016)
CGC Section 65080(b) (2)(E)(i): Outreach efforts to encourage active participation of a broad range of stakeholder groups in the planning process, consistent with the agency's adopted Federal Public Participation Plan, including, but not limited to, affordable housing advocates, transportation advocates, neighborhood and community groups, environmental advocates, home builder representatives, broad-based business organizations, landowners, commercial property interest, and homeowner associations.	2012-2035 RTP/SCS Chapter 6: Public Participation Plan 2012-2035 RTP/SCS Appendix: Public Participation and Consultation	2016-2040 RTP/SCS Appendix: Public Participation and Community Consultation
CGC Section 65080(b) (2)(E)(ii): Consultation with congestion management agencies, transportation agencies, and transportation commissions.	2012-2035 RTP/SCS Chapter 6: Public Participation Plan 2012-2035 RTP/SCS Appendix: Public Participation and Consultation	2016-2040 RTP/SCS Appendix: Public Participation and Community Consultation
CGC Section 65080(b) (2)(E)(iii): Workshops throughout the region to provide the public with the information and tools necessary to provide clear understanding of the issues and policy choices. At least one workshop shall be held in each county in the region. For counties with a population greater than 500,000, at least three workshops shall be held. Each workshop, to the extent practicable shall include urban simulation computer modeling to create visual representation of the sustainable communities strategy and the alternative planning strategy.	2012-2035 RTP/SCS Chapter 6: Public Participation Plan 2012-2035 RTP/SCS Appendix: Public Participation and Consultation	2016-2040 RTP/SCS Appendix: Public Participation and Community Consultation
CGC Section 65080(b) (2)(E)(v): At least three public hearings on the draft sustainable communities strategy in the regional transportation plan and alternative planning strategy, if one is prepared. If the metropolitan transportation organization consists of a single county, at least two public hearings shall be held. To the maximum extent feasible, the hearings shall be in different parts of the region to maximize the opportunity for participation by members of the public throughout the region.	2012-2035 RTP/SCS Chapter 6: Public Participation Plan 2012-2035 RTP/SCS Appendix: Public Participation and Consultation	2016-2040 RTP/SCS Appendix: Public Participation and Community Consultation
CGC Section 65080(b) (2)(E)(vi): A process for enabling members of the public to provide a single request to receive notices, information and updates.	2012-2035 RTP/SCS Chapter 6: Public Participation Plan 2012-2035 RTP/SCS Appendix: Public Participation and Consultation	2016-2040 RTP/SCS Appendix: Public Participation and Community Consultation
CGC Section 65080(b) (2)(F) In preparing a sustainable communities strategy, the metropolitan planning organization shall consider spheres of influence that have been adopted by the local agency formation commissions within its region.	2012-2035 RTP/SCS Appendix: Growth Forecast	2016-2040 RTP/SCS Appendix: Demographics and Growth Forecast

TABLE 1 SCS Requirements Matrix: continued

Required Element	Reference (2012)	Reference (2016)
GC Section 65080(b) (2)(G) Prior to adopting a sustainable communities strategy, the metropolitan planning organization shall quantify the reduction in greenhouse gas emissions projected to be achieved by the sustainable communities strategy and set forth the difference, if any, between the amount of that reduction and the target for the region established by the state board.	2012-2035 RTP/SCS Chapter 4: Sustainable Communities Strategy	2016-2040 RTP/SCS Chapter 8: Measuring Our Progress for the Future 2016-2040 RTP/SCS Appendices: SCS Background Documentation; Transportation Conformity Analysis
CGC Section 65080(b) (2)(J) Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land, nor, except as provided by subparagraph (I), shall either one be subject to any state approval. Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. Nothing in this section shall be interpreted to limit the state board's authority under any other provision of law. Nothing in this section shall be interpreted to authorize the abrogation of any vested right whether created by statute or by common law. Nothing in this section shall require a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan or an alternative planning strategy. Nothing in this section requires a metropolitan planning organization to approve a sustainable communities strategy that would be consistent with Part 450 of Title 23 of, or Part 93 of Title 40 of, the Code of Federal Regulations and any administrative guidance under those regulations. Nothing in this section relieves a public or private entity or any person from compliance with any other local, state, or federal law.	2012-2035 RTP/SCS Chapter 4: Sustainable Communities Strategy	2016-2040 RTP/SCS Chapter 5: A Plan for Mobility, Sustainability and a High Quality of Life 2016-2040 RTP/SCS Appendix: SCS Background Documentation

Source: SCAG

FORECASTED REGIONAL DEVELOPMENT TYPES BY LAND DEVELOPMENT CATEGORIES (LDCS)

Given the number of square miles the SCAG region encompasses, SCAG developed a simplified series of Land Development Categories (LDCs) to represent the dominant themes taken from the region's many General Plans. This was developed in order to facilitate regional modeling of land use information from nearly 200 distinct jurisdictions.

The LDCs employed in the RTP/SCS are not intended to represent detailed land use policies, but are used to describe the general conditions likely to occur within a specific area if recently emerging trends, such as transit-oriented development, were to continue in concert with the implementation of the 2016 RTP/SCS. These forecasted regional development types are shown in Exhibits 1 through 34 by county and subregion.

SCAG 2016 RTP/SCS SCENARIOS

OVERVIEW OF THE SCENARIOS

To develop a preferred scenario for the region in 2040, SCAG first generated four preliminary "sketch scenarios" for our region's future - each one representing a different vision for land use and transportation in 2040. More specifically, each scenario was designed to explore and convey the impact of where the region would grow, to what extent the growth would be focused within existing cities and towns, and how it would grow - the shape and style of the neighborhoods and transportation systems that would shape growth over the period. The following are descriptions of the four scenarios that were presented to the regional council, stakeholders, and at workshops throughout the region.

SCENARIO 1: TREND

Scenario 1 was a base case scenario that represented "business-as-usual" growth to 2040, based on the region's population, household and employment trends. By "base case" SCAG meant all existing regionally significant highway and transit projects, all ongoing Transportation Demand Management (TDM) and Transportation System Management (TSM) activities, and all projects which are undergoing right-of-way acquisitions, are currently under construction, have completed the federal environmental process (NEPA), or will be in the first two years of the previously conforming Federal Transportation Improvement Plan (FTIP). This scenario served as a yardstick to compare with the three other scenarios in this Plan. Growth and land use under the baseline scenario followed previous trends. Significant transportation investments or new policies regarding land use, housing or transportation were not introduced.

SCENARIO 2: 2012 RTP/SCS UPDATED WITH LOCAL INPUTS

Scenario 2 updated SCAG's established 2012 RTP/SCS with inputs from local jurisdictions, and included the adopted plan's suite of land use and transportation strategies, investments and policies. Scenario 2 envisioned future regional growth coordinated with the transportation system improvements of the approved 2012 RTP/SCS, as well as anticipated new transportation projects planned by the region's County Transportation Commissions (CTCs) and transit providers. This scenario reflected land use patterns as depicted by local general plan land use policies and refined by jurisdictions through SCAG's extensive bottom-up local review input process and outreach effort.

SCENARIO 3 (POLICY A): MAKING FURTHER PROGRESS

Scenario 3 (also known as Policy A) built upon Scenario 2 and incorporated additional best practices to increase transportation mode choice and reduce personal automobile dependency. This scenario included expanded regional investment in Transit Integration strategies to increase transit ridership. This scenario assumed that first/last mile

improvements will be made at all fixed-guideway transit stations (i.e. commuter rail, subway, light rail and bus rapid transit (BRT) stations) across the region. Scenario 3 tested a new concept called Livable Corridors, comprised of arterial roadways where jurisdictions are planning for some combination of high-quality bus service, increased opportunities for active transportation, and higher density residential and employment at key intersections. Scenario 3 also tested the concept of "Neighborhood Mobility Areas." This concept is built on a set of policies and complete street investments to encourage replacing automobile trips less than three miles in length with walking, bicycling and slow-speed electric vehicles. Scenario 3 incorporated new technology and innovations such as bike share and car sharing, and assumed growth of these shared mobility services in urban areas predominantly through private sector actions. This scenario built upon SCAG policies from the 2012 Plan, and allowed for more future growth in walkable, mixed-use communities and in High Quality Transit Areas (HQTAs).

SCENARIO 4 (POLICY B): EXCEEDING EXPECTATIONS

Scenario 4 (or Policy B) built upon Scenario 3, and represented an ambitious and holistic slate of public policies and investments. This scenario was intended to determine what policies would be required to achieve maximum per-capita greenhouse gas reductions. In order to inform a comprehensive discussion during outreach and deliberation. Scenario 4 assumed improved bus transit services throughout identified HQTAs, as well as land use policies that encourage density along those routes. There was added emphasis on higher density residential and mixed-use infill along arterials with high-quality bus service, and more robust active transportation infrastructure or Livable Corridors, as described in Scenario 3. This scenario directed new growth away from undeveloped high-quality habitat areas to promote resource conservation, and it assumed no new residential growth in areas vulnerable to future sea level rise. Scenario 4 included a mix of housing options, with even more focus on infill development in towns and urban centers. Multifamily development in HQTAs was emphasized throughout the region.

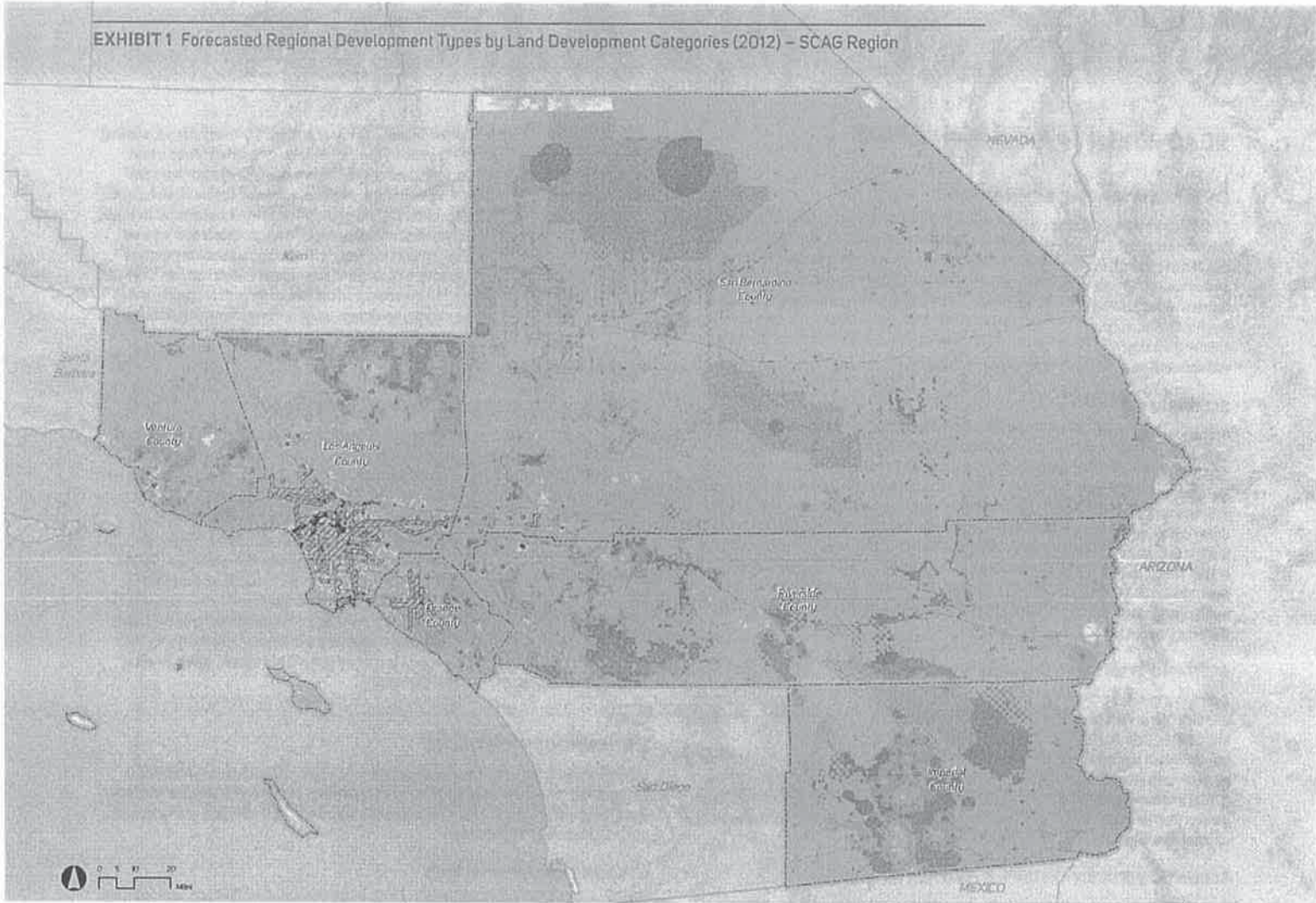
URBANFOOTPRINT/SPM

UrbanFootprint is the software modeling platform behind the SCAG Scenario Planning Model (SPM). It has been used by SCAG and its RTP/SCS consultants (Calthorpe Analytics is the developer of UrbanFootprint) to build and analyze the 2016 RTP/SCS scenarios and the Draft Preferred RTP/SCS plan.

UTILIZING URBANFOOTPRINT

UrbanFootprint starts with a detailed base data 'canvas' of existing buildings, land uses, and other details of the built environment. A suite of Place Types and Building Types are used to create scenarios of future development at a city, county or regional scale. Scenarios are then analyzed using UrbanFootprint's suite of analysis modules, which estimate building energy and water use, vehicle travel, public health consequences, and fiscal impacts.

EXHIBIT 1 Forecasted Regional Development Types by Land Development Categories (2012) – SCAG Region



 HQA (2012)

 California Protected Areas Database (CPAD)

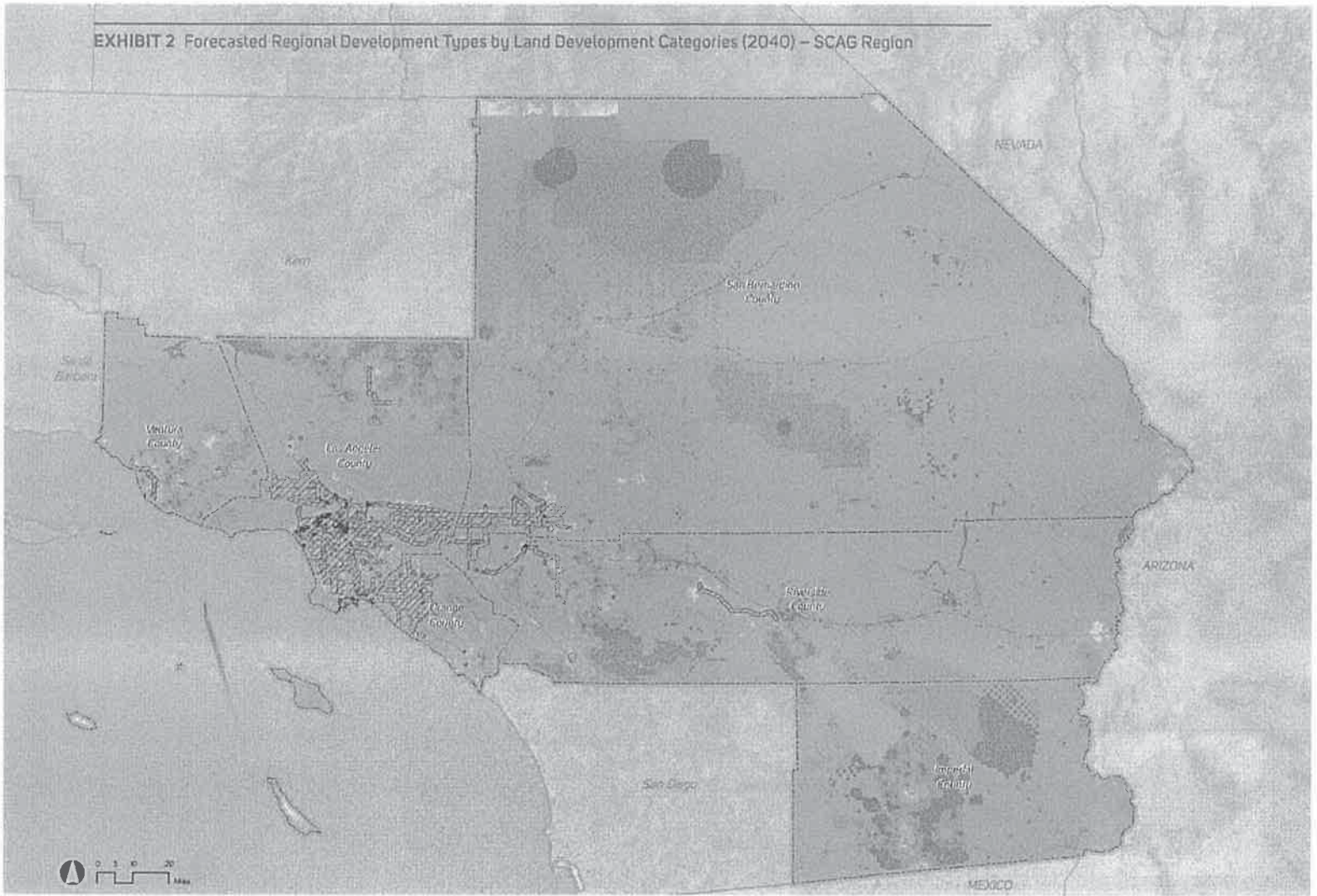
**Urban
Compact
Standard**

Description of LDCs can be found on page 43.

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analysis. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2015 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

Source: SCAG, 2015

EXHIBIT 2 Forecasted Regional Development Types by Land Development Categories (2040) – SCAG Region



 **HQA (2040)**  **California Protected Areas Database (CPAD)**

 **Urban Compact Standard**

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct regional modeling analysis. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2045 RTP/SCS. For purposes of qualifying for future incentives and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTEs, Councils of Governments, SCAG Subregions, Citizens and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

Source: SCAG, 2015

Description of LDCs can be found on page 43.

EXHIBIT 3 Forecasted Regional Development Types by Land Development Categories (2012) - Imperial County



-  HQTa (2012)
-  California Protected Areas Database (CPAD)
-  Urban Compact Standard

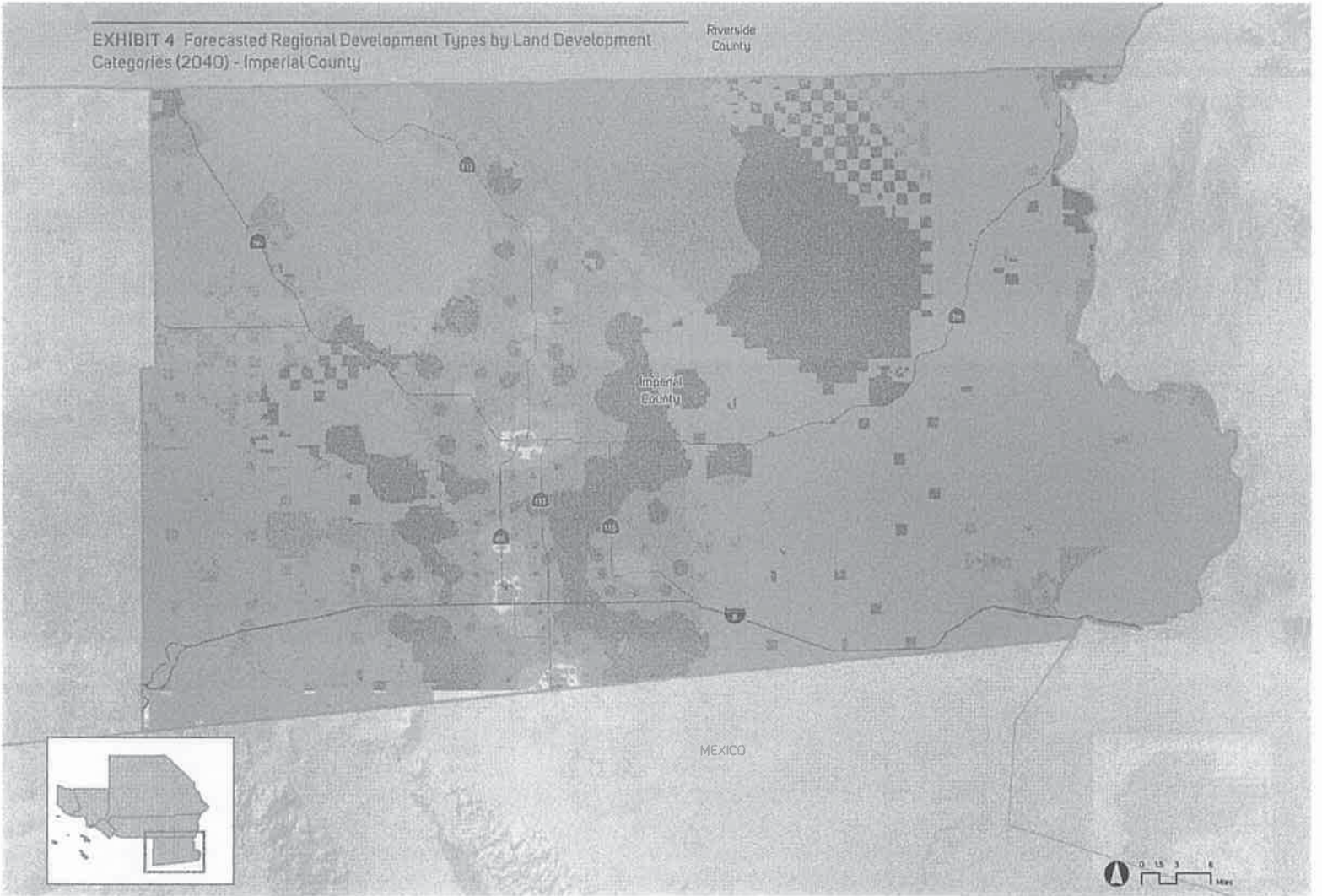
Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2015 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG, 2015)

Description of LDCs can be found on page 43.

EXHIBIT 4 Forecasted Regional Development Types by Land Development Categories (2040) - Imperial County

Riverside County



MEXICO



 HOTA (2040)  California Protected Areas Database (CPAD)

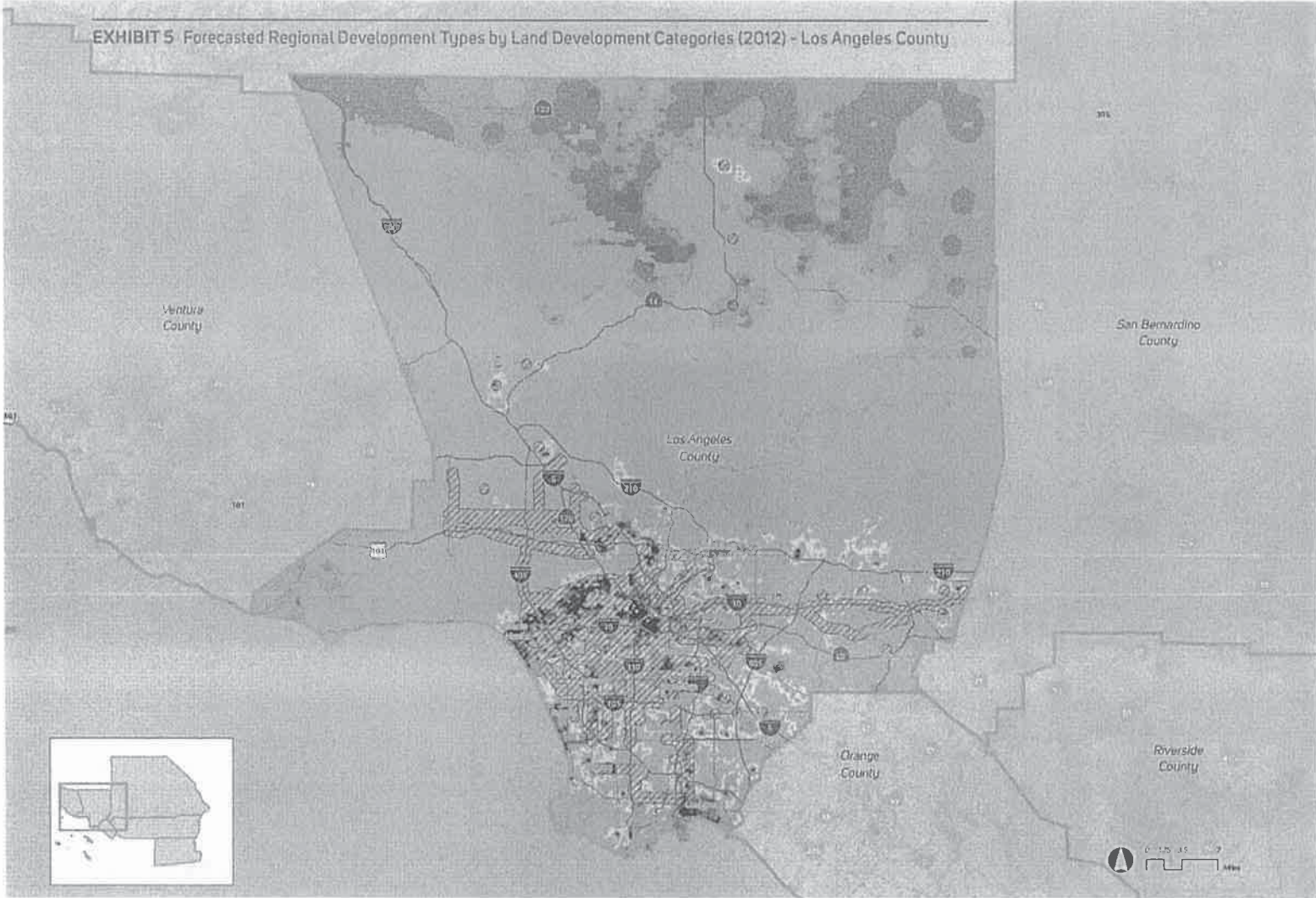
 Urban Compact Standard

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG, 2015)

Description of LDCs can be found on page 43.

EXHIBIT 5 Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles County



HQTA (2012)
 California Protected Areas Database (CPAD)

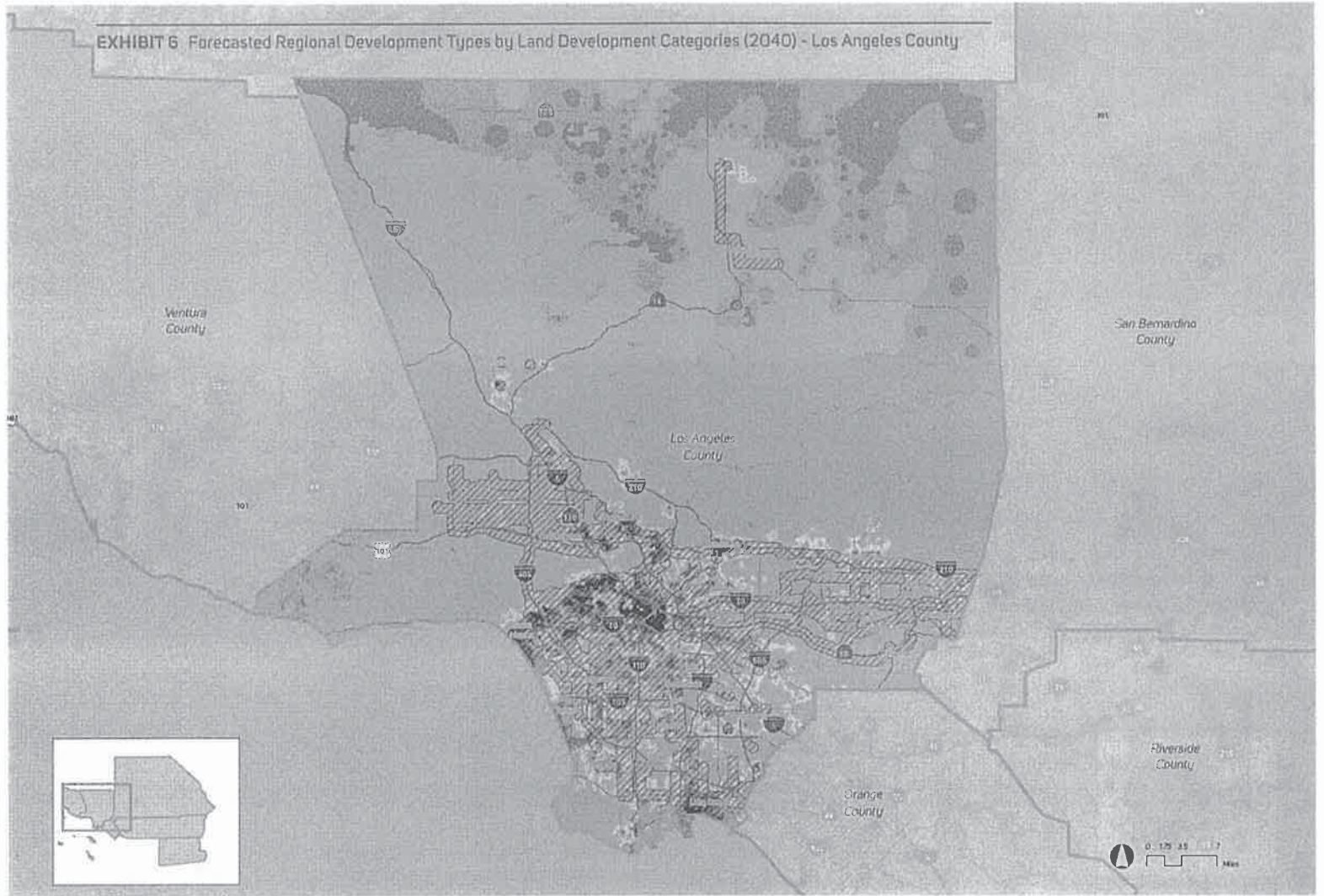
Urban Compact Standard

Description of LDCs can be found on page 43.

Note: The forecasted land use development patterns by LDCs shown on level or Transportation Analysis Zone (TAZ) level data will not be used in conflict resolution modeling analysis. Data at the TAZ level or at a geography smaller than the jurisdiction level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2035 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Citizens and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, and respective policy committees and local jurisdictions.

Source: SCAG, 2015

EXHIBIT 6 Forecasted Regional Development Types by Land Development Categories (2040) - Los Angeles County



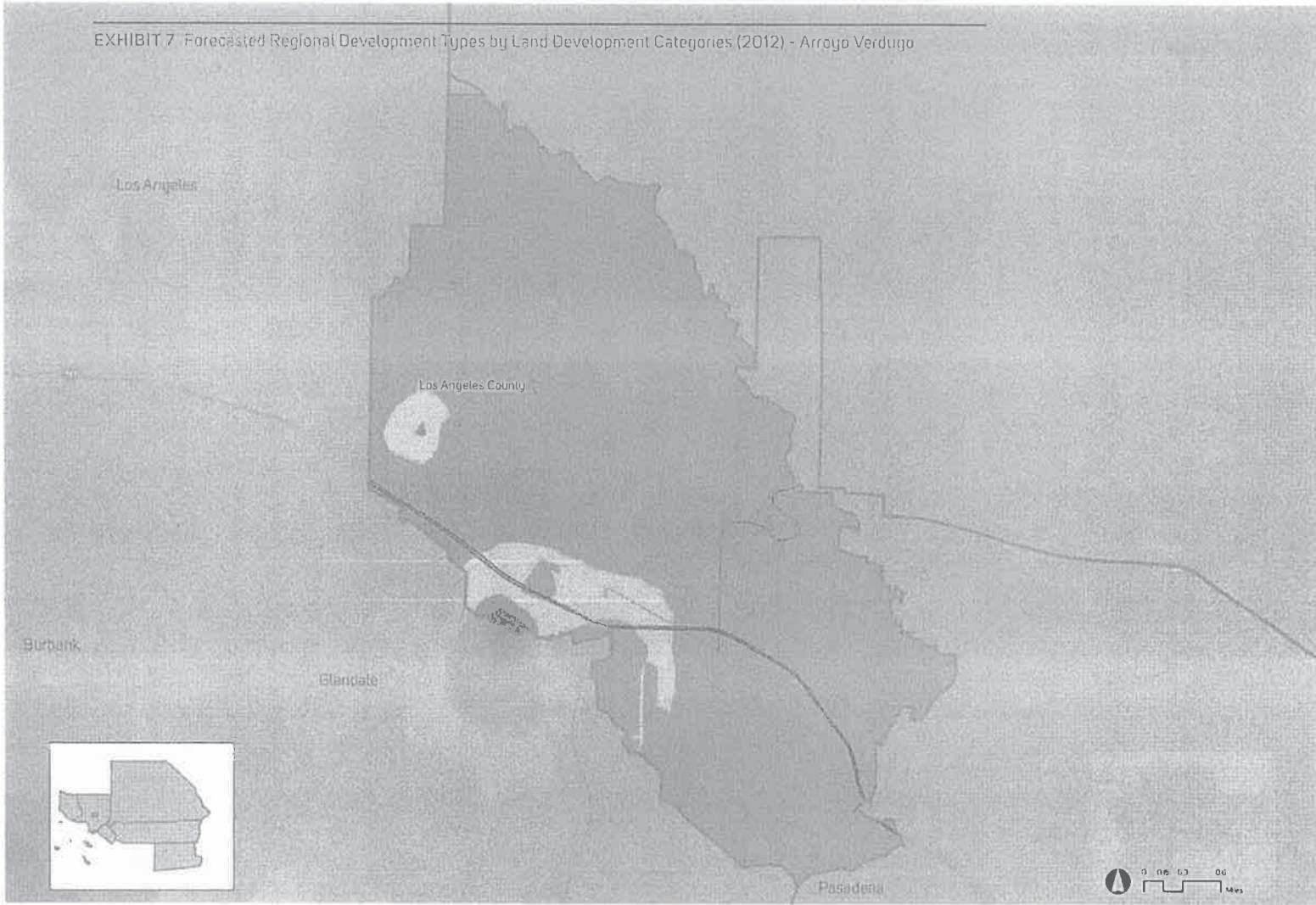
 HQTAs (2040)
  California Protected Areas Database (CPAD)
  Urban Compact Standard

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct regional modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2040 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps should be determined consistently with the Sustainable Communities Strategy that only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective planning committees and local jurisdictions.

(Source: SCAG, 2015)

Distribution of LDCs can be found on page 43.

EXHIBIT 7 Forecasted Regional Development Types by Land Development Categories (2012) - Arroyo Verdugo



HQTA (2012) California Protected Areas Database (CPAD)

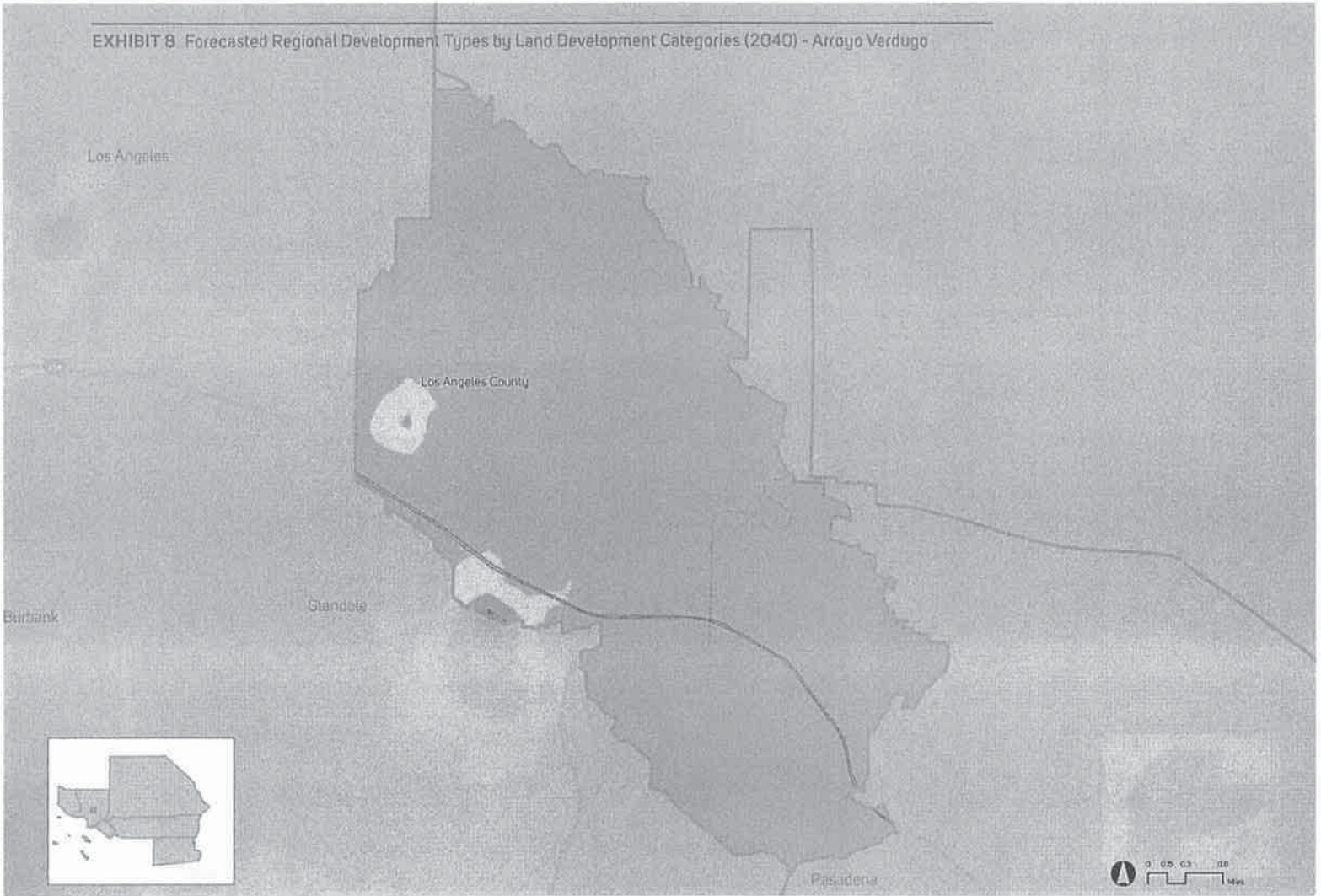
Urban Compact Standard

Description of LDCs can be found on page 43.

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG, 2015)

EXHIBIT 8 Forecasted Regional Development Types by Land Development Categories (2040) - Arroyo Verdugo



HQTA (2040)

California Protected Areas Database (CPAD)

Urban Compact Standard

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG, 2015)

Description of LDCs can be found on page 43.

EXHIBIT 9 Forecasted Regional Development Types by Land Development Categories (2012) - Gateway Cities



HQTA (2012) California Protected Areas Database (CPAD)

Urban Compact Standard

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analysis. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

Source: SCAG, 2015

Description of LDCs can be found on page 43.

EXHIBIT 12 Forecasted Regional Development Types by Land Development Categories (2040) - Las Virgenes - Malibu



HQTA (2040)

California Protected Areas Database (CPAD)

Urban Compact Standard

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG, 2015)

Description of LDCs can be found on page 43.

EXHIBIT 13 - Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion



 HOTA (2012)  California Protected Areas Database (CPAD)

 Urban Compact Standard

Description of LDCs can be found on page 43.

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2018 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG, 2018)

EXHIBIT 15 Forecasted Regional Development Types by Land Development Categories (2012) - North Los Angeles County



HQTA (2012)

California Protected Areas Database (CPAD)

Urban
Compact
Standard

Description of LDCs can be found on page 43.

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG, 2015)

Attachment 3

General Plan Land Use (Year 2015)



SCAG General Plan Land Use Legend (2015)

- | | | | | |
|---------------------------|-------------------------|--|----------------------------------|---------------------------------|
| Single Family Residential | Commercial and Services | Industrial Transportation, Communications, and Utilities | Mixed Residential and Commercial | Water |
| Multi-Family Residential | Facilities | Mixed | Open Space and Recreation | Specific Plan |
| Other Residential | Education | Commercial and Industrial | Agriculture | Undevelopable or Protected Land |
| General Office | Military Installations | Vacant | Unknown | |

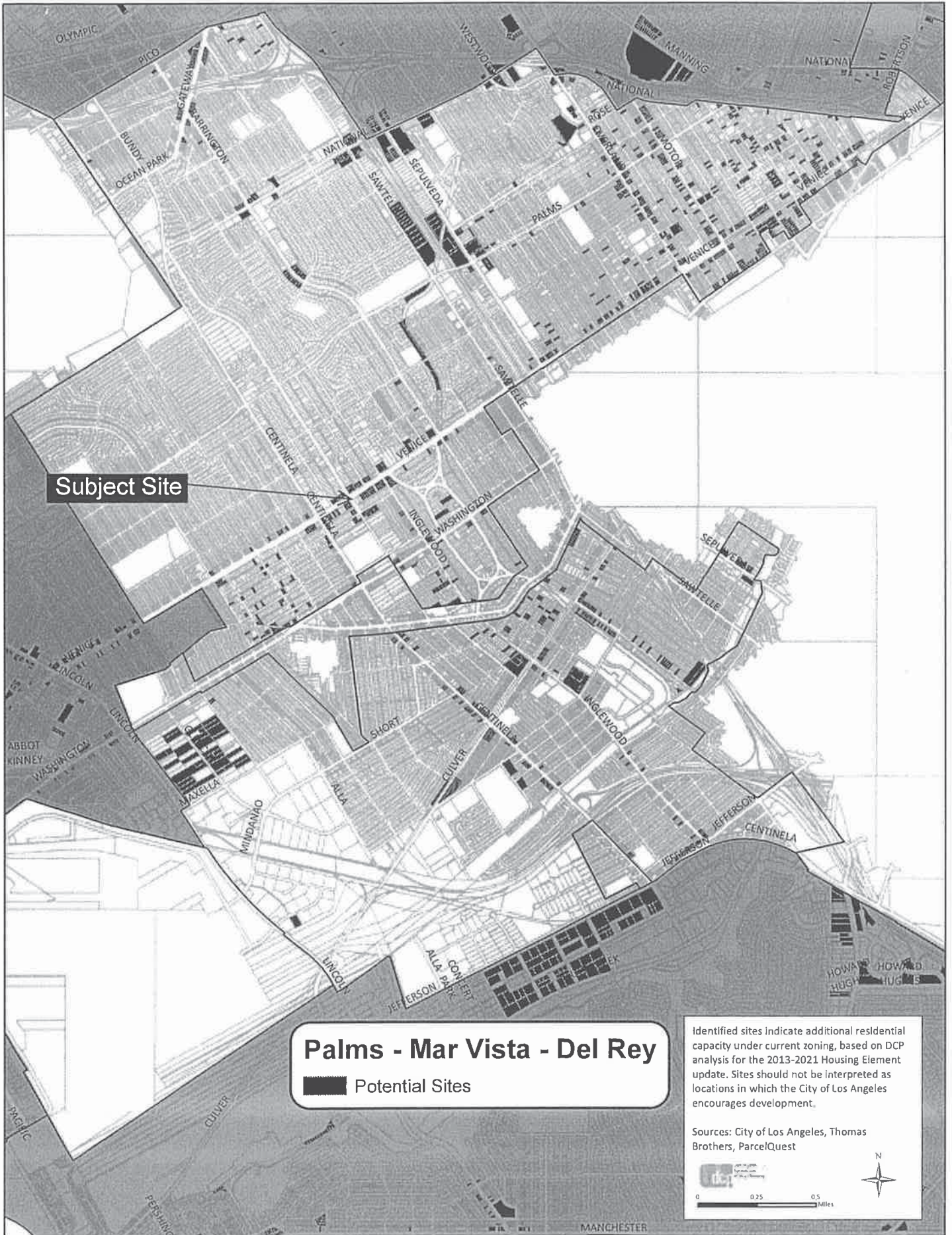
Existing Land Use (Year 2015)



SCAG Existing Land Use Legend (2015)

- | | | | | | |
|---------------------------|--|---|----------------------------------|--------------------|---------------|
| Single Family Residential | General Office Commercial and Services | Military Installations | Commercial and Industrial | Agriculture | Undevelopable |
| Multi-Family Residential | Facilities | Industrial | Mixed Residential and Commercial | Vacant | Unknown |
| Other Residential | Education | Transportation, Communications, and Utilities | Open Space and Recreation | Water | |
| | Mixed | | | Under Construction | |

Attachment 4



10. Related Cases — Table, Map, Images.



Connie Chauv <connie.chauv@lacity.org>

12444 Venice Boulevard

Robert Duff <robert.duff@lacity.org>

Tue, Feb 21, 2017 at 10:02 AM

To: Connie Chauv <connie.chauv@lacity.org>

Cc: Terrance W O'Connell <terrance.oconnell@lacity.org>

Upon further review by the LAFD Hydrants & Access Unit there are no additional comments regarding hydrants or access.

Issues regarding the "piece mealing " of projects along the corridor will be addressed in the future update of the Community Plans.

On Tue, Feb 21, 2017 at 9:27 AM, Connie Chauv <connie.chauv@lacity.org> wrote:

Hello Inspector Duff,

Following up from our phone call from last Thursday. As mentioned, we are reaching out to verify if Fire has any additional comments for the project at 12444 Venice Boulevard.

Can you please confirm if the following mitigation measures in the MND are sufficient?

XIV-10. Public Services (Fire)

- Environmental impacts may result from project implementation due to the location of the Project in an area having marginal fire protection facilities. However, this potential impact will be mitigated to a less than significant level by the following measure:
- The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Thank you!



Connie Chauv
Department of City Planning
Project Planning - West LA
 T: (213) 978-0016
 200 N. Spring St., Room 720/721
 Los Angeles, CA. 90012

On Tue, Feb 14, 2017 at 2:02 PM, Connie Chauv <connie.chauv@lacity.org> wrote:

Hello Terrance,

Thanks for returning my phone call. As mentioned, we are reaching out regarding a project at 12444 Venice Boulevard, which came to you via Case Management on June 16, 2015.

As mentioned, the project has been appealed, with appeal points regarding the public safety analysis in the environmental review. I've attached the following:

- Appeal letter from Ilah Hardesty - please see pdf page 7 (appeal point 14) and pdf pages 33-34 for appeal points regarding fire safety
- Environmental MND - please see pdf page 4 (Mitigation Measure XIV-10) and pdf page 58 (under XIV-a) for the public services analysis
- Project plans

We are reaching out to verify if Fire has any responses/comments to the appeal points noted above. If you could provide any additional comments to us by the end of the week on official letterhead for the record, we would really appreciate it.

Thank you!



Connie Chauv
Department of City Planning
Project Planning - West LA
T: (213) 978-0016
200 N. Spring St., Room 720/721
Los Angeles, CA. 90012

Robert E. Duff, Fire Inspector II
Fire Development Svcs/ Hydrants & Access
Los Angeles Fire Department
201 N. Figueroa St. Ste 300
Los Angeles, CA 90012
(213) 482-6502

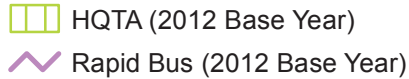
2012 - 2040 Employment Growth Overlay with 2012 High Quality Transit Area (HQTA) and Rapid Bus



Employment Growth, 2012 - 2040 (Jobs per Square Mile)



HQTA and Rapid Bus



(Please note this City of Los Angeles California Association schedules which the City of Los Angeles

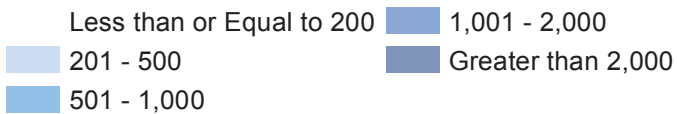
(Source: SCAG)

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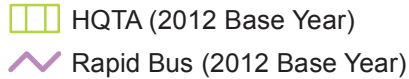
2012 - 2040 Employment Growth Overlay with 2012 High Quality Transit Area (HQTA) and Rapid Bus



Employment Growth, 2012 - 2040 (Jobs per Square Mile)



HQTA and Rapid Bus



(Please note this City of Los Angeles California Association schedules which the City of Los Angeles

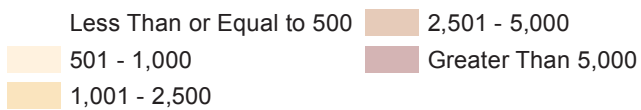
(Source: SCAG)

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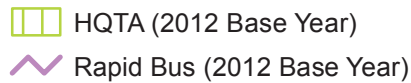
2012 - 2040 Population Growth Overlay with 2012 High Quality Transit Area (HQTA) and Rapid Bus



Population Growth, 2012 - 2040 (Persons per Square Mile)



HQTA and Rapid Bus



(Please note this City of Los Angeles California Association schedules which the City of Los Angeles

(Source: SCAG)

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