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June 28, 2018

The Honorable City Council
City of Los Angeles
City Hall, Room 395
Los Angeles, California 90012

Dear Honorable Members:

COUNCIL FILE NO. 18-0437; RESPONSE TO LETTER FROM FIX THE CITY DATED JUNE 26, 2018 RELATED TO THE EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN FEIR (CASE NO. ENV-2013-622-EIR AND STATE CLEARINGHOUSE NO. 2013031038)

On June 26, 2018 the City received a letter from Fix the City (FTC) directed to the members of the Planning and Land Use Management Committee commenting on the Final Environmental Impact Report (FEIR) prepared for the Exposition Corridor Transit Neighborhood Plan and the associated ordinances and resolution ("ECTNP Project"). Because this comment letter was submitted after the comment period for the Draft Environmental Impact Report (DEIR) and after the publication of the FEIR, the City is not required to provide a formal response under CEQA and the CEQA Guidelines. As a general matter, the City finds nothing in the letter that would require different analysis than that provided in the DEIR and the FEIR. Additionally, most of the issues raised in the letter were addressed in responses to comments in the FEIR, including in Master Response No. 2 - General Plan Framework Element Policy 3.3.2 (FEIR pp. 2-8 through 2-18), Master Response No. 3 - Emergency Services (FEIR pp. 2-19 through 2-24), Master Response No. 4 - Utilities (FEIR pp. 2-25 through 2-31), and Master Response No. 6 - Traffic Analysis Methodology (FEIR pp. 2-37 through 2-38). FTC has not provided new evidence to support its arguments. The following response is intended to provide further clarification and information to support the City's certification of the EIR for the adoption of the ECTNP Project, and adopt necessary findings and a statement of overriding considerations.

In its letter, FTC claims that by certifying the FEIR and approving the ECTNP Project, the City is violating a policy in the West Los Angeles Community Plan that mirrors General Plan Framework Element Objective 3.3 and its related policies, including Policy 3.3.2. This West Los Angeles Community Plan policy and program is set forth under Goal 16 on pages III-27 through III-29. Specifically, FTC claims the City has failed to make the finding set forth in the program associated with West Los Angeles Community Plan Policy 16-2.1 which states:

Decision makers shall adopt a finding with regard to infrastructure adequacy as part of their action on discretionary approvals resulting in increased density or intensity.

The findings for the ECTNP Project do in fact state that it is consistent with the General Plan and West Los Angeles Community Plan, and specifically state that the ECTNP Project is consistent with policies requiring findings of infrastructure adequacy. Furthermore, the findings regarding land use plan consistency specifically state that the Proposed Plan Area contains sufficient public infrastructure and services to support existing and future residents. This finding is supported by evidence in the administrative record, including evidence and analysis contained in the findings themselves as well as in FEIR Master Response Nos. 2, 3, 4, and 6 referenced above.

The program of the West Los Angeles Community Plan referenced in the commenter's letter is provided below for reference, along with the overarching Goal, Objective, and Policy the referenced program is intended to accomplish:

Goal 16: To the extent feasible and consistent with the Mobility Plan 2035's and Community Plans' policies promoting multi-modal transportation and safety, a system of freeways, and streets that provides a circulation system which supports existing and planned land uses while maintaining a desired Level of Service at intersections.

Objective 16-2: To ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.

Policy 16-2.1: No increase in density shall be effected by zone change, plan amendment, subdivision or other discretionary action, unless it is determined that the transportation infrastructure serving the property can accommodate the traffic generated.

Program: Decision makers shall adopt a finding with regards to infrastructure adequacy as part of their action on discretionary approvals resulting in increased density or intensity.

The Staff Recommendation Report to the City Planning Commission dated November 9, 2017 contains the findings regarding land use plan consistency stating that the ECTNP Project is in substantial conformance with the purposes, intent, and provisions of the General Plan pursuant to Charter Section 556, which includes consistency with the Community Plans as part of the General Plan Land Use Element (pp. F-1, F-2, and F-5 through F-20). The findings also specifically state that the ECTNP Project is consistent with policies and objectives contained in the General Plan Framework Element that refer to infrastructure adequacy.


The findings cite consistency with analogous policies in the General Plan Framework, including Objective 3.3, which states: "Accommodate projected population and employment growth within the City and each Community Plan Area and plan for the provision of adequate supporting transportation and utility infrastructure and public services" (p. F-6), and Objective 3.7, which states: "Provide for the stability and enhancement of multifamily neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved" (pp. F-7 and F-8). The findings specifically state that the Proposed Plan Area "contains sufficient public infrastructure and services to support existing and future residents" (p. F-8) and that "The Proposed Plan concentrates future residential development within the Exposition Corridor, within close proximity to transit stations and along mixed-use corridors, where there is currently extensive transportation, utilities, and other infrastructure to support new development" (p. F-18). Therefore, the ECTNP Project is consistent with the West Los Angeles Community Plan Program under Policy 16-2.1, cited by the commenter, in that the findings state that the infrastructure is adequate to accommodate the projected growth.

Furthermore, West Los Angeles Community Plan Goal 16 qualifies Policy 16-2.1 in that this finding determining transportation infrastructure adequacy shall be made in relation to accommodating the traffic generated "to the extent feasible and consistent with the Mobility Plan 2035's and Community Plans' policies promoting multi-modal transportation and safety." The findings thoroughly document how the ECTNP Project is consistent with Mobility Plan 2035's policies promoting the accommodation of multiple modes of transportation, complete streets, transportation metrics that evaluate the multiple purposes streets serve, and reduction of dependence on single-occupancy vehicles (pp. F-18 through F-20). The findings also state that the ECTNP Project "responds to the recent introduction of substantial new transit infrastructure (the Exposition LRT) to the area" (p. F-8). Therefore, the ECTNP Project is furthermore consistent with the West Los Angeles Community Plan Program under Policy 16-2.1, regarding adequacy of transportation infrastructure with respect to Mobility Plan 2035 policies pursuant to Community Plan Goal 16.

FTC's comment fails to provide any specifics and does not provide any substantial evidence to support the need for different analysis or conclusions in the EIR. Pursuant to CEQA Guidelines Sections 15204 and 15064 an impact is not significant without a showing of substantial evidence.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning

A handwritten signature in black ink, appearing to read "Craig Weber", with a long horizontal flourish extending to the right.

Craig Weber
Principal City Planner