

**COMMENTS
AND
RESPONSES
ON THE
DRAFT EIR**



LOS ANGELES
CITYWIDE GENERAL
PLAN FRAMEWORK

A CITYWIDE LONG RANGE
COMPREHENSIVE STRATEGY

VOLUME I

City of Los Angeles
Department of City Planning

**PROPOSED CITY OF LOS ANGELES GENERAL PLAN FRAMEWORK
DRAFT ENVIRONMENTAL IMPACT REPORT
RESPONSES TO COMMENTS**

The California Environmental Quality Act (CEQA) provides the opportunity during a specified public review period, for any person or entity to submit comments to a Lead Agency concerning any environmental effects of a project being considered by the Lead Agency. CEQA requires that the Lead Agency evaluate comments on the environmental issues received from persons who reviewed the Draft Environmental Impact Report, and prepare written responses for inclusion in the Final EIR.

If the Lead Agency determines that changes are warranted, revisions are made to the Draft EIR analysis. Revisions may also be made to the proposed project to mitigate anticipated impacts. The responses must provide detailed rationale with the recommendations and objections raised in the comments. In either case, CEQA requires good faith, reasoned analysis in responses.

FORWARD

Many of the comments submitted in response to the Draft Environmental Impact Report (DEIR) for the proposed City of Los Angeles General Plan Framework (GPF) address the content of the proposed project rather than the analyses or findings of the DEIR. In accordance with the requirements of the California Environmental Quality Act (CEQA), only written responses have been prepared for the comments addressing the content of the DEIR. Though, in some cases additional information has been included in the responses to comments regarding the proposed project to assist the commenter in understanding the conclusions of the DEIR.

While the comments pertaining to the proposed project addressed a broad diversity of issues, a number of basic concerns were repeatedly identified. The following presents an overview of and provides information in response to these. Technically, these responses are incorporated in this document only as information and do not constitute a part of the legal environmental record for the proposed project.

1. Environmental Review Process

A number of comments asserted that it is the intent of the proposed project to “free development from environmental constraints” and, implicitly, the environmental review process. This is a misunderstanding of the project’s intent to “expedite development entitlements.” The Framework and EIR does not, nor can it legally, exempt any future plan or project from the requirements of CEQA. The information and analyses contained in the Framework EIR, however, will be useful in supporting the environmental review of subsequent plans (e.g., Community Plan updates) and proposed development projects that are consistent with the Framework. Applications may include the reference of the Framework EIR’s “existing environmental setting,” the use of the “impact evaluations” as a basis for the CEQA-required “cumulative impacts” analyses, and the incorporation of the “mitigation measures.” Such use of a comprehensive citywide EIR is supported and encouraged by CEQA.

Subsequent plans and proposed development projects will be reviewed to determine the form of environmental documentation required and identify any significant impacts that were not addressed by the Framework EIR (CEQA Guidelines Section 15168).

2. Public Involvement

Concerns that the Framework would “reduce the legal standing of citizens to challenge development decisions” are incorrect. The public’s legal rights have clearly been defined through legislation and the courts. In addition, any Community Plan update or amendment requires its own review and approval process that includes public participation.

3. Relationship to Specific Plans

Concerns have been raised regarding the status of the City’s adopted Specific Plans that regulate local areas. This may have resulted from a lack of clarity of the land use designations contained on the Framework’s Preliminary Land Use Diagram. It is not the intent of the Framework to alter nor supersede the adopted Specific Plans. The Framework’s text and the Land Use Diagram are being revised to eliminate any confusion.

4. Proposition U

Adoption of the Framework will not override Proposition U.

There are some portions of the centers and boulevards linked to transit where higher density development makes sense. Where this potential exists, the Planning Department proposes to review the appropriateness of the permitted intensity and height districts through the Community Plan update process. Such would involve thorough public review and input prior before any changes are finalized.

5. Impacts of the Framework on Open Space

No public open space is being eliminated by the Framework. The Framework encourages the continued efforts of federal, state, county, and city agencies to develop a regional and citywide open space network and acquire new open space lands. It also provides for the continued implementation of City policies, standards, and ordinances that promote the clustering of development in hillside areas to protect natural resources and increase open space.

Changes in the amount of open space that would result from the Framework are not clearly defined in the DEIR and will be clarified. The confusion results from the inclusion of privately-owned lands designated by the adopted Community Plans as “open space.” While these constitute visual open space and natural lands, existing City policy and zoning permits their development. However, it is recognized that some of these may never be developed due to site constraints or other considerations. However, the extent to which this would occur cannot be quantified and is speculative.

6. Building Heights

The Framework’s land use tables indicate that building heights in “Community Centers” may be 3 to 8 stories. This has been incorrectly interpreted to imply that 8 story structures would be permitted in all such centers. However, this is intended to represent a range from which a specific limit would be selected by the Community Plans to reflect the area’s character. For example, lower intensity Community Centers abutted by single family residential may be one story, while more urban Community Centers abutted by multi-family may be higher.

7. Protection of Single Family Neighborhoods

The Framework maintains all single family residential areas of the City. None are identified as “targeted growth areas.” While policies permit the introduction of second units and new forms of single family housing, the locations in which this may be permitted are not identified by the

Framework. The City's Municipal Code permits such development in some existing zones. Decisions regarding additional areas in which this would occur are relegated to the Community Plan update process and would involve thorough public review and input prior before any changes are finalized.

8. Location of Targeted Growth Areas

The Framework assigns new land use classifications only to areas that have historically been designated by the Community Plans and zoned for commercial and industrial uses. Outside of these areas, the Framework maintains all other existing Community Plan land use classifications. Where there are adopted Specific Plans, their land use designations are reflected on the Framework's Land Use Diagram (see above). All boundaries for the designated districts, centers, and boulevards are generalized and intended to be refined through the Community Plan update process.

9. Development Outside of Targeted Growth Areas

The Framework does not infer that there would be no growth outside of the "targeted growth areas." In these areas, development would be guided by the uses and density/intensity standards defined by the existing adopted Community Plans.

10. Employment Forecasts

The Framework's intention to maintain the existing jobs-housing ratio reflects fiscal analyses that reveal a substantial fiscal loss if the existing ratio is not maintained. It is asserted by a number of commenters that the City currently has too many jobs given its population level, and that the decline in the citywide jobs-housing ratio that is projected under the baseline SCAG forecasts would actually be an improvement. Following this logic, one could argue that the job losses experienced during the recent recession would be beneficial. It is suggested that the City's current jobs-housing ratio is "unbalanced" because it exceeds the regional average. This reasoning is flawed in that it completely fails to recognize the City's historic role as a regional center of employment and economic activity. Given that the City's economy has developed around this structural position within the region, local firms, residents, and government depend on a jobs-rich environment.

Many comments fail to distinguish between the development capacity provided by the Framework and the development patterns that are likely to occur under the Plan, which targets maintenance of the current jobs-housing ratio of 1.46 through the year 2010. The asserted jobs-housing ratio of 2.33:1 assumes *full buildout of all industrial and commercial capacity* and is therefore a *theoretical* number. From the standpoint of market demand, it is unlikely to be achieved. For example, the forecasts represent approximately 29.6 percent of the available retail capacity, approximately 3.7 percent of the office capacity, and approximately 18 percent of the multi-family capacity.

These comments also fail to note that the theoretical jobs-housing ratio of 2.33 under the Framework represents a substantial reduction from the existing adopted Community Plans' theoretical ratio of 3.49 and, therefore, significantly addresses the issue of existing plan and zoning overcapacity.

It should be further clarified that the Framework's population and employment estimates are intended to function as planning "forecasts" and do not represent an *absolute* level of development that is mandated to occur. In reality, whether they occur in the year 2010, before, or after is not significant. These are intended to guide the planning of supporting land uses, infrastructure, and services citywide and in each Community Plan Area. The absence of such

“forecasts” in the past has inhibited the establishment of efficient infrastructure and service plans, often resulting in system inefficiency, overdesign, and high costs.

They growth forecasts are intended to be flexible to reflect “real” growth rates and impacts. The Framework provides for their modification to reflect the levels of growth, infrastructure and service improvements, and impacts experienced through the implementation of a growth monitoring and reporting. The Framework provides for subsequent planning and analyses to determine the appropriateness of increasing the thresholds/forecasts in the future.

LIST OF COMMENTERS

During the public review period for the City of Los Angeles General Plan Framework, a total of 60 comment letters were submitted by individuals, entities, and agencies. The commenters are listed below:

	Organization	Signatory	Date	Page
A	AIA Los Angeles	Lance Bird	5/19/95	1
B	Jack Allen – Palisades Preservation Association	Jack Allen	5/26/95	9
C	Benedict Canyon Association	Barbara Fine	5/16/95	36
D	Beverly Wilshire Homes Association, Inc.	Diana Plotkin	5/24/95	44
E	Brentwood Village Association	Clyde Augustson	5/25/95	60
F	Briarcliff Improvement Association	Lynette Berg Robe	5/26/95	66
G	California Regional Water Quality Control Board	Deborah J. Smith	5/31/95	72
H	Cheviot Hills Homeowners Association/California Country Club Homes Association	Barbara A. Fine	5/25/95	74
I	State of California Department of Conservation	Tess Dennis	4/4/95	100
J	State of California Department of Transportation	Robert Goodell	5/18/95	103
K	Echo Park Renters’ and Homeowners’ Association	Jeb Brighthouse	5/24/95	106
L	City of El Segundo	Hyrum B. Fedje	5/22/95	110
M	The Federation of Hillside and Canyon Associations, Inc.	Barbara A. Fine	5/26/95	118
N	FOCUS - Federation of Organizations for Conserving Open Space	Alexander M. Man	5/26/95	131
O	Friends of Ahmanson Ranch	Vince Curtis	4/7/95	134
P	Friends of Westwood, Inc.	Allan Rabinowitz	5/26/95	136
Q	City of Glendale	John McKenna	4/19/95	139
R	Governors Office of Planning and Research	Michael Chiriatti	5/18/95	141
S	State Senator, Tom Hayden, 23rd District	Sandy Brown	5/25/95	149
T	Heal the Bay	Roger Gorke	5/26/95	156
U	Pacific Palisades Residents Association	Rubell Helgeson	4/24/95	168
V	Homeowners of Encino	Gerald Silver	3/7/95	249
W	City of Los Angeles, Bureau of Engineering	Ara Kasparian	5/26/95	270
X	City of Los Angeles. Bureau of Street Lighting	George Eslinger	5/3/95	275
Y	City of Los Angeles, City Engineer	Philip Richardson, Robert S. Horii	4/24/95	278

	Organization	Signatory	Date	Page
Z	City of Los Angeles, Fire Department	Donald Manning	4/5/95	280
AA	City of Los Angeles, Dept. of Public Works	Delwin A. Biagi	5/25/95	292
AB	City of Los Angeles, Dept. of Water & Power	Dwane Buchholz	4/18/95	296
AC	City of Los Angeles, Dept. of Water & Power	D'Lyn R. Nelson	6/1/95	299
AD	Los Angeles Unified School District	Bob Niccum	5/25/95	315
AE	County of Los Angeles Dept. of Public Works	Harry W. Stone	4/26/95	448
AF	The Melrose Hill Neighborhood Association	Robert Ficklin	5/1/95	452
AG	Los Angeles Metropolitan Transit Authority	Kendra Morries	5/22/95	455
AH	Los Angeles Metropolitan Transit Authority	Brad McAllester	8/12/94	459
AI	Metropolitan Water District	Laura J. Simonek	5/25/95	469
AJ	Miracle Mile Apartment & Commercial Owners Assoc.	Linda Scheid	4/26/95	474
AK	City of Monterey Park	Ray Hamada	4/26/95	496
AL	Mount Washington Association	Liz Johnson	4/25/95	499
AM	John B. Murdock, Attorney	John B. Murdoch	5/26/95	504
AN	Patricia O'Brian	Patricia O'Brian	5/26/95	516
AO	Pacific Palisades Community Council	Lila Gordon	5/25/95	518
AP	People for Livable and Active Neighborhoods in Los Angeles	Bill Christopher	5/26/95	531
AQ	Nita B. Rosenfeld	Nita B. Rosenfeld	5/24/95	537
AR	San Fernando Valley Federation	Gordon Murley	5/25/95	550
AS	City of Santa Monica	Karen Ginsberg	5/18/95	572
AT	Santa Monica Bay Restoration Project	Marianne Yamaguchi	5/27/95	576
AU	Santa Monica Mountains Conservancy	Belinda Faustinos	5/25/95	581
AV	Save Los Angeles Now	Diane Metzger	5/24/95	583
AW	SCAG - Southern California Association of Governments	Eric Roth	4/19/95	590
AX	City of Simi Valley	Laura Kuhn	2/24/95	597
AY	Studio City Residents Association	Tony Lucenta	5/25/95	599
AZ	Tarzana Property Owners Association	Gregory Nelson	5/25/95	616
BA	Topanga-Las Virgenes Resource Conservation District	Rosi Dagit	5/26/95	618
BB	City of Torrance	City of Torrance	5/25/95	636
BC	Tract No. 7260 Association, Inc.	Richard S. Harnetz	5/26/95	640
BD	Assemblymember Antonio Villariagosa, 45th District	Antonio Villariagosa	4/25/95	665
BE	City of West Hollywood	Gay Forbes	5/26/95	669
BF	City of West Hollywood	Gay Forbes, Ruth Nadel, Suzanne Frick, Mark Winogrand	5/25/95	686
BG	West of Westwood Homeowners Assoc.	Terri Tippit	5/24/95	690
*BH	City of Los Angeles Board of Public Works	J.P. Ellman	6/15/95	692