CHAPTER 6 Alternatives to the Proposed Project

6.1 INTRODUCTION

The purpose of this chapter is to describe and comparatively evaluate a reasonable range of potentially feasible alternatives to the Granada Hills–Knollwood Community Plan and implementing ordinance and the Sylmar Community Plan and implementing ordinances (proposed plans). To meet the requirements of CEQA, a reasonable range of feasible alternatives must be considered. Those alternatives must be intended to reduce or eliminate some or all of the significant or potentially significant adverse environmental effects of the proposed plans, while still meeting most of the basic plans objectives.

6.1.1 California Environmental Quality Act Requirements

An EIR must evaluate the comparative merits of a reasonable range of alternatives to the proposed project, or to the location of the proposed project that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project (CEQA Guidelines Section 15126.6). An EIR need not evaluate the environmental effects of alternatives at the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project. The CEQA Guidelines provide the following language for discussing alternatives to a proposed project:

> The specific alternative of the "no project" shall also be evaluated along with its impacts. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125) (CEQA Guidelines, Section 15126.6 subd. (e)(1)).
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> The "no project" alternative shall discuss … existing conditions … as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. … When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan (CEQA Guidelines, Section 15126.6 subds. (e)(2)–(3)(A)).
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> If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines, Section 15126.6 subd. (e)(2)).
>
> The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the proposed objectives, or would be more costly (CEQA Guidelines, Section 15126.6 subd. (b)).
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> If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but

> in less detail than the significant effects of the project as proposed (CEQA Guidelines, Section 15126.6 subd. (d)).
>
> The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. … The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. … An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines, Section 15126.6 subd. (f)).

The requirement that an EIR evaluate alternatives to the proposed project or alternatives that address the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the proposed project. The EIR need examine in detail only the alternatives that could feasibly attain most of the basic objectives of the project. Alternatives that fail to meet fundamental project purpose need not be addressed in detail in an EIR (in re *Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1165–1167). The Public Resources Code and the CEQA Guidelines direct that the EIR need "set forth only those alternatives necessary to permit a reasoned choice." The CEQA Guidelines provide a definition for "a range of reasonable alternatives" and, thus, limit the number and type of alternatives that need to be evaluated in a given EIR. According to the CEQA Guidelines (Section 15126.6(b)):

> The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (CEQA Guidelines Section 15126.6(f)(1)). Notably, alternatives analyzed in an EIR need not be "actually feasible," but rather need only be "potentially feasible." (CEQA Guidelines Section 15126.6(a).) Whether alternatives are "actually feasible" is a determination ultimately made by a lead agency's decision-making body (e.g., City Council) at the time of action on a proposed project based on a variety of factors, including how well, in the decision makers' assessment, alternatives meet stated project objectives. A decision-making body can reject alternatives on policy grounds provided that its adopted findings addressing feasibility embody a reasonable balancing of competing economic, social, environmental, and other considerations supported by substantial evidence. (Refer to *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

Because the proposed plans would not result in a substantial number of significant adverse impacts, the range of alternatives analyzed in this EIR is necessarily comparatively small and is focused on those alternatives that could achieve most of the project objectives and reduce the significant impacts of the proposed plans.

Finally, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative" (Section 15126.6(f)(2)(3)).”

The proposed Granada Hills–Knollwood and Sylmar Community Plans are a comprehensive revision of the existing Community Plans. The proposed plans are designed to accommodate the 2030 population, housing, and employment projections based on assumptions about the level of development that can reasonably be expected to occur during the life of the Community Plans, given the CPAs' land use designations and policies.

6.2 RATIONALE FOR SELECTING POTENTIALLY FEASIBLE ALTERNATIVES

The Alternatives may include a different type of project, modification of the proposed project, or suitable Alternative project sites. However, the range of Alternatives discussed in an EIR is governed by a "rule of reason" which CEQA Guidelines Section 15126.6(f) defines as:

> … set[ting] forth only those Alternatives necessary to permit a reasoned choice. The Alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those Alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible Alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

Among the factors that may be taken into account when addressing the feasibility of Alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent could reasonably acquire, control, or otherwise have access to an Alternative site. An EIR need not consider an Alternative whose effects could not be reasonably identified, and whose implementation is remote or speculative.

For purposes of this analysis, the project Alternatives are evaluated to determine the extent to which they attain the basic project objectives, while significantly lessening any significant effects of the project. The proposed plans' objectives promote the internal relationship of mutually supportive uses, such as employment, housing, recreation and community-serving facilities, etc., so as to decrease dependency on the automobile, encourage alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, promote sustainability, and foster a strong sense of community.

The primary objectives of the proposed plans are as follows:

- Focus growth into Framework-identified Centers and corridors while preserving single-family neighborhoods, equestrian, and open space.
- Accommodate projected growth by providing for a range of housing options, mixed uses, and commercial space for future employment opportunities.
- Maximize development opportunities around existing and future transit systems while minimizing adverse impacts.
- Improve the function, design, and economic vitality of the commercial areas.
- Preserve and enhance the positive characteristics of existing land uses.

- Preserve and strengthen commercial developments to provide a diverse job-producing economic base and to enhance the appearance of these areas.
- Encourage the protection, enhancement, and conservation of valuable community resources (natural, historic, and cultural) and community identity and identify appropriate mitigation measures to minimize project impacts.
- Provide for the development of civic, cultural, religious, education, and other community uses such as libraries, fire stations, community centers, police facilities, parks, schools, etc.
- Include a comprehensive program of resource protection, enhancement, conservation, and re-use and provide mitigation of impacts of the project.
- Enhance the positive characteristics of residential neighborhoods, including conservation of the existing rural, suburban, and equinekeeping residential scale and character, while providing a variety of housing opportunities.
- Preserve and strengthen industrial areas and support environmentally sensitive industrial and employment centers that provide local and regional jobs and bolster the community's economic and physical condition.

6.2.1 Significant and Unavoidable Impacts

The following are the significant and unavoidable impacts of the proposed plans that have been identified in this EIR. The significant unavoidable impacts of the proposed plans are relatively limited given the mainly suburbanized character of the CPAs and the policies of the proposed plans. Most of them result from construction-related activities, which often cannot be mitigated to less-than-significant levels despite being temporary in nature. Two significant impacts relates to increased traffic throughout the CPAs. These impacts would occur notwithstanding the various policies in the proposed plans intended to reduce per capita vehicle miles traveled. Other impacts were identified as significant and unavoidable because the specifics of future projects that could be constructed under the proposed plans is not known. The alternatives presented in this chapter were considered in light of these significant effects.

Granada Hills–Knollwood Community Plan

- **Aesthetics**
  - > Implementation of the proposed plan could have a substantial adverse effect on a scenic vista.
  - > Implementation of the proposed plan could substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
  - > Implementation of the proposed plan could substantially degrade the existing visual character or quality of the site and its surroundings.
  - > Implementation of the proposed plan could create a new source of substantial light or glare that could adversely affect day- or nighttime views in the area.
  - > Implementation of the proposed plan could result in development of structures that would shade shadow-sensitive uses for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

- **Air Quality**
  - > Implementation of the proposed plan could violate air quality standards or contribute substantially to an existing or projected air quality violation.
  - > Implementation of the proposed plan could result in a cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
  - > Implementation of the proposed plan could expose sensitive receptors to substantial pollutant concentrations.
- **Greenhouse Gas Emissions**
  - > Implementation of the proposed plan would result in development that could contribute substantial emissions of greenhouse gases.
  - > Project emissions of greenhouse gases would have the potential to conflict with the implementation of AB 32.
- **Noise**
  - > Construction of development pursuant to the proposed plan could result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
  - > Construction of development pursuant to the proposed plan could generate or expose persons or structures to excessive groundborne vibration.
  - > Construction of development pursuant to the proposed plan could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project due to construction activities.
- **Traffic**
  - > The volume-weighted average V/C ratio under the proposed plan would exceed that of existing traffic conditions, and the percentage of roadway segments projected to operate at unsatisfactory levels of service would substantially exceed that of existing traffic conditions.
  - > Implementation of the proposed plan could result in inadequate emergency access during construction unless mitigated.
- **Utilities/Service Systems**
  - > The proposed plan could impact water supplies that serve the CPA. While water supply is expected to be adequate, LADWP is looking at a number of strategies to serve citywide growth, including additional conservation measures, use restrictions, recycling programs, and regulatory changes that may occur over the life of the plan.

Sylmar Community Plan

- **Aesthetics**
  - > Implementation of the proposed plan could have a substantial adverse effect on a scenic vista.
  - > Implementation of the proposed plan could substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

- > Implementation of the proposed plan could substantially degrade the existing visual character or quality of the site and its surroundings.
- > Implementation of the proposed plan could create a new source of substantial light or glare that could adversely affect day- or nighttime views in the area.
- > Implementation of the proposed plan could result in development of structures that would shade shadow-sensitive uses for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

■ **Air Quality**

- > Implementation of the proposed plan could violate air quality standards or contribute substantially to an existing or projected air quality violation.
- > Implementation of the proposed plan could result in a cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
- > Implementation of the proposed plan could expose sensitive receptors to substantial pollutant concentrations.

■ **Greenhouse Gas Emissions**

- > Implementation of the proposed plan would result in development that could contribute substantial emissions of greenhouse gases.
- > Project emissions of greenhouse gases would have the potential to conflict with the implementation of AB 32.

■ **Noise**

- > Construction and operation of development pursuant to the Sylmar Community Plan could result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- > Development of new residential uses adjacent to the Sylmar/San Fernando Metrolink Station under the Sylmar Community Plan could result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- > Construction of development pursuant to the Sylmar Community Plan could generate or expose persons or structures to excessive groundborne vibration.
- > Construction of development pursuant to the Sylmar Community Plan could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing the project due to construction activities.

■ **Traffic**

- > The volume-weighted average V/C ratio under the proposed plan would exceed that of existing traffic conditions, and the percentage of roadway segments projected to operate at unsatisfactory levels of service would substantially exceed that of existing traffic conditions.
- > Implementation of the proposed plan could result in inadequate emergency access during construction unless mitigated.

- **Utilities/Service Systems**
  - > The proposed plan could impact water supplies that serve the CPA. While water supply is expected to be adequate, LADWP is looking at a number of strategies to serve citywide growth, including additional conservation measures, use restrictions, recycling programs, and regulatory changes that may occur over the life of the plan.

6.3 REQUIREMENTS AND CONSIDERATIONS FOR IDENTIFICATION OF ALTERNATIVES

The City's effort to identify, describe, and evaluate a reasonable range of feasible alternatives focused on (1) achieving full compliance with CEQA requirements and (2) informing the public and decision-makers of the comparative effects of alternatives that address concerns expressed by the public during the outreach process for the development of the plan. Consistent with the CEQA Guidelines, primary consideration was given to alternatives that would reduce one or more of the significant impacts of the proposed plans, while still meeting most of the basic project objectives. Because CEQA encourages cities and counties, when conducting environmental review for major planning projects such as general plan updates, to integrate mitigation measures directly into proposed plan policies, often the only significant effects shown in an EIR for such a planning project are the significant, unavoidable impacts that cannot feasibly be addressed through policy language. Here, then, the City has focused on the relatively few significant unavoidable effects of the proposed plans in formulating alternatives.

Traditionally under CEQA, EIRs for plan updates identify an array of significant environmental impacts that are caused by large increments of new growth projected to occur over the typical 20-year planning horizon of a general, community, or specific plan. In typical EIRs, those effects often include increased traffic congestion, increased air pollution, substantial increases in water demand, loss of farmland or natural habitats, and the like. In light of those types of adverse effects, the EIRs typically include alternatives that describe substantially reduced amounts of future new land use because such alternatives typically reduce on an across-the-board basis the type of impacts caused by the new land uses allowed under the proposed plans.

In the case of this EIR, there are two major factors that have affected the identification and consideration of alternatives in the EIR: (1) the type and extremely limited number of significant impacts that would result from implementation of the proposed plans, and (2) the limited changes that are proposed in the proposed plans, which are primarily to focus future development in identified transit-oriented corridors, correct inconsistencies with the General Plan Framework and zoning, change nomenclature to coincide with General Plan Land Use Designations, provide guidelines and standards for development projects, and expand and refine design guidelines, in part to protect historic resources and existing residential neighborhoods. Compared to existing conditions, the proposed plans would accommodate population, housing, and employment growth. However, as noted in Section 4.11 (Population, Housing, and Employment), this growth would be consistent with the Southern California Association of Governments (SCAG) regional forecasts for Granada Hills–Knollwood and Sylmar as well as the City of Los Angeles as a whole, and would not result in growth that has not been reasonably anticipated. These issues are discussed further below.

6.3.1 Types of Significant Impacts

The proposed plans would create a sustainable integrated system of land use and transportation that would avoid the vast majority of environmental consequences that are typically caused by these types of plans in the region and across the state. Nevertheless, some unavoidable significant impacts of the proposed plans, described in Chapter 4 and listed in the subsection above, cannot be completely avoided by any reduction in the levels of land use change in the proposed plans other than essentially prohibiting all new construction in the CPAs over the next 20 years.

The EIR identifies a limited range of unavoidable effects that would or could be associated with the proposed plans, including (1) construction activities that would be caused by essentially any material level of land use change and (2) addition of even the smallest amount of incrementally increased impact when added to existing or future baseline conditions that are created by existing land uses and projected future growth outside the CPAs. For example, the EIR identifies the potential for unavoidable significant impacts from construction noise and construction air quality/greenhouse gas emissions; these impacts could only be avoided by essentially prohibiting any substantial outdoor construction projects in the CPAs over the next 20 years. A further example is that the EIR identifies that the volume-weighted average V/C ratio under the proposed plans would substantially exceed that of existing traffic conditions, and the number of roadway segments projected to operate at unsatisfactory levels of service would substantially exceed that of existing traffic conditions. Because these impacts would occur with or without implementation of the proposed plans, small, moderate, or even large reductions in the amount of new land use allowed under the proposed plans would continue to create significant unavoidable effects on traffic, and none of these reductions would create noticeable changes in the level of congestion. Additional significant and unavoidable impacts are identified in the EIR due to the uncertainty of the specific projects that would be constructed through implementation of the proposed plans. For example, project-specific light and glare or visual character impacts could occur for one or more future projects, and because it is unknown whether these can be mitigated, the impact has been identified as significant and unavoidable. Some of the impacts in the EIR are identified as significant and unavoidable for this reason.

6.3.2 Displaced Growth

In recent years, statewide and regional planning laws, regulations, and policies have caused lead agencies to view such alternatives from a new perspective that takes into account the regional implications of alternatives in addition to the specific, localized effects. Recently enacted laws such as AB 32 and SB 375 have an implied or explicit emphasis on the need to reduce per capita resource consumption and greenhouse gas (GHG) generation. Assuming that the population of the state and its major urban regions are going to continue to grow over the coming decades, reduced-density alternatives near the state's urban cores are seen to potentially contribute to furthering sprawl on the suburban edge. These types of actions are now often seen as being inconsistent with statewide or regional efforts to increase development densities in order to reduce per capita pollution and resource consumption.

In this case, a reduced development alternative would allow for less development than the proposed plans, and in doing so would proportionally reduce potential localized effects related to increased population and development intensity, including congestion, air emissions, demands on public services

and utilities, increased water demand and wastewater generation, and construction noise and other related effects. For the most part, the localized effects of the proposed plans would be reduced in proportion to the reduction in new land use developable under the proposed plans; in general, the greater the reduction in new land use development, the greater the potential effects avoided or reduced. However, the plans' land use and circulation policies are specifically designed to provide increased affordable and workforce housing, greater amounts of open space, connecting street networks, transportation demand management strategies, and specific protections for neighborhoods and historic structures that would not be in place under a substantially reduced development alternative. Additionally, the reduced development alternative would not meet the City's objectives to focus growth in urban centers and along corridors served by transit.

Growth in the southern California region, including the greater Los Angeles basin, is projected based on long-term trends in natural reproduction, immigration, and changes in demographic patterns. For the most part, because the specific land use policies of a local jurisdiction, like the City of Los Angeles, tend to affect the nature of growth in that particular community, they are not believed to have a material effect on the overall population of a major region. However, it is not reasonable to assume that adoption of a new land use element that materially reduces growth within the City would result in materially less growth in the region; rather, the growth in population and/or employment would likely occur elsewhere in the region. To the extent that the City of Los Angeles is, on a regional scale, central and close to the densest core of jobs and housing in southern California, it is reasonable to conclude that growth that is anticipated to occur in the City, if redirected elsewhere, would result in pressure for more growth in portions of the region that are located further from the regional core, including Southern California's developing fringe and exurbs. While the Granada Hills–Knollwood and Sylmar CPAs are located on the periphery of the City, to the north, they are directly connected to major transportation networks in the dense Southern California region. In general, the impacts of growth on the periphery of a major urban area tend to be more severe than the impacts of densification in areas closer to the core of such a major urban area, as growth in such areas typically involves greenfield development and longer commute trips, with attendant proportionate increases in traffic, air pollution, and greenhouse gas emissions.

The State of California requires that cities plan for changes in population, housing demand, and employment. If growth is anticipated, each city must accommodate a share of the region's projected population. These projections are developed by the City of Los Angeles in concert with SCAG, the Metropolitan Planning Organization for the six-county region. SCAG is comprised of local governments and agencies in the region. SCAG is mandated by federal and state governments to prepare the Regional Transportation Plan (RTP), a 20-year transportation plan for the region that addresses regional growth, air quality, and other issues based on analysis of past and future regional trends. The Department of City Planning refines and adjusts the distribution of SCAG population and housing unit projections (employment projections were not adjusted) to be consistent with the Framework Element and other City policies, reflecting most of the projected growth in the City's regional and commercial centers.

In addition, SCAG has developed its Compass Blueprint 2 Percent Strategy that calls for modest changes to current land use and transportation trends on only 2 percent of the land area of the region. SCAG has identified 2 Percent Opportunity Areas, which are key parts of the region for targeting growth, where projects, plans and policies consistent with the Compass Blueprint principles will best serve the mobility,

livability, prosperity and sustainability goals of the Growth Vision.[250] These opportunity areas include metro centers, city centers, rail transit stops, bus rapid transit corridors, airports, ports, and industrial centers, priority residential infill areas, and Compass Blueprint priority communities. The result of less growth in the CPAs and proportionally more growth on the fringes of the greater Los Angeles urban area, or any locations further from the regional core than the Granada Hills–Knollwood and Sylmar CPAs, would be increased consumption of undeveloped land (i.e., traditional greenfield development), greater reliance on the automobile, greater commute distances, and greater demand for infrastructure and other services in areas, as the growth would occur in a less dense, more auto-oriented, land-intensive manner. On a regional basis, per capita vehicle trips would be increased, along with VMT, air emissions, and GHG emissions. The accommodation of population and employment at lower densities throughout the region could also result in the loss of increased amounts of raw land, including, potentially, habitats for sensitive and protected species, and/or the loss of valuable farmland. In addition, growth at more traditional suburban densities would comparatively increase demand for water, an increasingly scarce resources, potentially increasing pressure on the sensitive habitats of the Sacramento/San Joaquin Delta and the Colorado River. Conversely, accommodation of future population at higher densities and under the programs and standards of the proposed plans would tend to minimize both per capita and regional consumption of resources and generation of pollutants.

Thus, while an alternative with less new land use development and a lower population than contemplated under the proposed plans and the regional projections would have marginally lower environmental impacts within the limits of the CPAs, it would not reduce environmental effects from a citywide or regional perspective. Under this scenario, the Southern California region would likely have greater environmental degradation.

For reasons explained above, an alternative that arbitrarily reduces the amount of growth contemplated by the proposed plans would not fall into the CEQA definition of a reasonable range of alternatives in light of the planning context in which the City finds itself, as such an alternative would tend to be contrary to the basic objectives of the proposed plans and would not substantially lessen any of significant effects of the proposed plans to a less-than-significant level.

6.3.3 Alternatives Considered and Eliminated from Further Evaluation

No Development Alternative—As the Granada Hills–Knollwood and Sylmar CPAs are subject to existing Community Plans that allow development, the No Development Alternative does not represent a scenario that would likely occur.

Limited Development Alternative—The Limited Development Alternative would limit and deter the vast majority of new development activities in the CPAs over the next 20 years. New construction would be limited to development of vacant lots, reuse of existing buildings, or replacement or reconstruction of existing buildings that may be damaged or need improvements to meet safety codes. Vacant lots could be developed to a level compatible with the land uses on adjacent properties. Substantially limiting the construction of any structures associated with new land uses would be a means of reducing, as much as

[250] SCAG Compass Blueprint http://www.compassblueprint.org/opportunityareas. Accessed 10/12/2011.

possible, the significant unavoidable effects of the proposed plans related to construction activities, and even very small contributions to intersections congested by existing and future pass-through traffic. While this alternative, for the most part, would involve carrying the existing conditions in the CPAs forward into the future, unlike the No Development Alternative, this is an "action alternative" that would require the adoption of new policies and development regulations to limit most existing development to improvements within the envelope of existing buildings rather than permit continued land use activity under the existing Community Plans.

With this alternative, some population growth could occur within the CPAs, to the extent that existing residential units, or units that have already been approved, could accommodate additional residents, or due to the change of use of existing structures that could occur under this alternative (e.g., an older commercial structure could be renovated and changed to residential uses). Similarly, there could be increased intensity of nonresidential uses by changing the use in a building from an existing use with low levels of employment (e.g., warehouse) to a use with higher-levels of employment (e.g., office or retail).

This alternative was rejected as infeasible because it would not accommodate the future growth forecasted by SCAG and would, therefore, be inconsistent with population, housing, and employment projections.

Reduced Height and Development—With this alternative, new building heights and FAR would be lower than under the proposed plans, but all other land use and transportation policies of the plan would remain as proposed. New land uses would be limited to 35 feet in height. A maximum FAR of 1.5 is assumed for all commercial and industrial development. In recognition of the projected amount of growth and economic development pressures over the coming 20 years, it is anticipated that under this alternative new land uses would be geographically spread out to more parcels across the CPAs and that there would be inadequate land available to accommodate the projected growth exclusively on the existing commercial and transit corridors. Under this alternative, it is expected that less mixed-use development would occur in these focus areas than the proposed plans. This alternative was rejected as infeasible because it would not accommodate the future growth forecasted by SCAG and would, therefore, be inconsistent with population, housing, and employment projections. In addition, spreading out development throughout the CPAs would not necessarily protect existing residential neighborhoods.

Distributed Growth—The proposed plans concentrate future growth along established commercial and transit corridors. Little development is considered elsewhere in the CPAs. Distributing growth in other areas of the CPAs would not reduce the significant and unavoidable impacts of the proposed plans, which are related to construction air quality and noise and traffic. In addition, as most of the CPAs contain residential uses, distributing growth in other areas would not achieve the City's goals of preserving existing residential neighborhoods. In fact, more spread-out growth, or growth in other areas of the CPAs, would likely result in greater impacts to visual quality, scenic views, and historic resources. Increased building height impacts would also be greater in sensitive residential areas, an impact that would not occur under the proposed plans. Also, there would likely be increased vehicle miles traveled, as future growth would not be concentrated along existing transportation corridors where employees, residents, and visitors can take advantage of existing transit opportunities. The City carefully considered those areas in the CPAs with the highest potential to accommodate future growth while limiting environmental impacts. Other areas of the CPAs do not have the same potential to accommodate the

same level of growth that is required to be consistent with SCAG growth forecasts. Therefore, this alternative was rejected from further consideration.

6.3.4 Alternatives Considered in This Draft EIR

In accordance with CEQA Guidelines Section 15126.6, the only feasible alternative to the proposed plans would be continuation of the 1996 Granada Hills–Knollwood Community Plan and the 1997 Sylmar Community Plan. As explained previously, the Los Angeles City Council will make the final determination of the feasibility of the alternatives and the extent to which the alternatives meet the individual project objectives.

The alternatives include the following:

- **Alternative 1: No Project (Continuation of 1996 and 1997 Existing Plans)**—This legally mandated alternative, which is not subject to the requirements to meet most of the project objectives of the proposed plans or to substantially lessen any of the significant effects of the project, reflects conditions likely to occur in the future without the adoption of the proposed plans. Rather, future land uses in the Granada Hills–Knollwood and Sylmar CPAs would be guided by continued implementation of the existing plans. The anticipated land use in 2030 under this alternative are shown in Table 6-1 (Land Uses Anticipated under Alternative 1), below.
- **Alternative 2: SCAG 2030 Forecast**—Under this alternative, the distribution of employment, housing, and population levels are analyzed at levels based on those projected by SCAG for the year 2030 (as adjusted). These projections are provided to the City of Los Angeles by SCAG, which forecasts population, housing, and employment growth for cities and counties in the Southern California region.

The following subsection describes the above alternative, comparatively analyzes the potential environmental effects of the alternatives, and evaluates the extent that the alternatives meet the proposed plans objectives. The focus of the analysis is the difference between the environmental effects of the alternatives compared to those of the proposed plans, with an emphasis on how the alternatives affect the identified significant impacts of the proposed plans, and the identification of any new effects created by the alternative. For each issue area, the analysis indicates which mitigation measures would be required for the alternatives and which significant and unavoidable impacts would be avoided or substantially reduced. Where appropriate, the analysis indicates whether any mitigation measures would no longer be required, or whether additional mitigation measures would be required for the alternatives. Unless otherwise indicated, the level of significance and relative magnitude of environmental impacts, and any required mitigation measures, would be the same for the alternatives as for the proposed plan. Table 2-2 (Summary of Impacts Compared to Existing Conditions and Mitigation Measures) in Chapter 2 (Summary) provides a comparison of the impacts of the proposed plans to the impacts of each of the alternatives.

6.4 ALTERNATIVE 1: NO PROJECT (CONTINUATION OF EXISTING PLANS)

6.4.1 Description

Alternative 1, the No Project (1996 and 1997 Plans) Alternative, reflects "no project" conditions (i.e., without the adoption of a new plan). The No Project Alternative would continue the land use and transportation goals, policies, and programs contained in the adopted Granada Hills–Knollwood and Sylmar Community Plans. Future land use change would occur as allowed in the existing plans. Under the Alternative 1 No Project Alternative, projections from SCAG of future population and employment were assumed within the CPAs and in the surrounding region; these projections were assumed to reflect growth likely to occur without the adoption of the proposed plans.

Granada Hills–Knollwood Community Plan

Under Alternative 1, projected growth through 2030 reflects a population of 70,482, housing units totaling 25,353, and 17,984 jobs (compared to the SCAG projected jobs of 19,976). The proposed Granada Hills–Knollwood Community Plan would result in a decrease in the reasonably anticipated capacity of the CPA, with the potential to accommodate an anticipated level of 66,168 persons compared to the existing plan capacity of 70,482, which represents a decrease of 4,314 persons. With regard to housing units, the proposed plan would result in maximum development of 23,801 dwelling units, compared to the 25,353 units under Alternative 1, or 1,552 fewer units than would be accommodated under the proposed plan. There would be 2,210 fewer jobs provided by Alternative 1 compared to the proposed plan.

Table 6-1 (Summary Comparison of the Proposed Granada Hills–Knollwood Community Plan and Alternative 1) summarizes the total population, dwelling units, and employment for both plans.

Table 6-1 Summary Comparison of Proposed Granada Hills–Knollwood Community Plan and Alternative 1

	Reasonable Capacity Proposed Plan	*Alternative 1: Continuation of Existing Plan*
Population	66,168	70,482
Housing	23,801	25,353
Employment	20,194	17,984

SOURCE: Los Angeles Department of City Planning (2011).

Under this alternative, it is assumed there would be no revisions in land use designation or zoning. Current land use densities and intensities would remain and typical urban infill development would continue to occur throughout the Granada Hills–Knollwood CPA, not necessarily concentrated along existing commercial corridors. Entitlement requests for zone changes and General Plan Amendments would likely continue as existing regulations do not reflect focused development in commercial and industrial areas.

Sylmar Community Plan

Under Alternative 1, projected growth through 2030 reflects a population of 99,770, housing units totaling 27,714, and 24,285 jobs (compared to the SCAG projected jobs of 25,600). The proposed plan would result in a decrease in the reasonable anticipated capacity of the Sylmar CPA, with the potential to accommodate an anticipated level of 89,378 persons compared to the existing plan population of 99,770, which represents a decrease of 10,392 persons. With regard to housing units, the proposed plan would result in maximum development of 24,827 dwelling units, compared to the 27,714 units under Alternative 1, or 2,887 fewer units than would be accommodated under the proposed plan. Finally, there would be 2,104 fewer jobs provided by Alternative 1 compared to the proposed plan.

Table 6-2 (Summary Comparison of the Proposed Sylmar Community Plan and Alternative 1) summarizes the total population, dwelling units, and employment for both plans.

Table 6-2 Summary Comparison of Proposed Sylmar Community Plan and Alternative 1

	Reasonable Capacity Proposed Plan	*Alternative 1: Continuation of Existing Plan*
Population	89,378	99,770
Housing	24,827	27,714
Employment	26,389	24,285

SOURCE: Los Angeles Department of City Planning (2011).

Under this alternative, it is assumed there would be no revisions in land use designation or zoning. Current land use densities and intensities would remain and typical urban infill development would continue to occur throughout the Sylmar CPA, not necessarily concentrated along existing commercial and mixed-use and transit-oriented corridors. Entitlement requests for zone changes and General Plan Amendments would likely continue as existing regulations do not reflect focused development in commercial and industrial areas.

6.4.2 Comparative Environmental Effects

As shown in Table 6-1 and Table 6-2, continuation of the existing community plans would accommodate a greater number of residents, more dwelling units, and fewer jobs than the proposed plans. With greater levels of development, significant impacts related to construction, such as construction noise, air pollution, and greenhouse gas emissions, would be greater under Alternative 1 than under the proposed plans. Because future growth in the CPAs would not be concentrated around major commercial and transit corridors, this alternative could also result in greater potential for historic and cultural resource impacts, such as the loss of noteworthy agricultural and equine keeping residences, than under the proposed plans. It could also have greater impacts on existing residential neighborhoods, as the policies providing for transitions in height and massing, concentration of denser uses in existing commercial and transit corridors, and specifically protecting existing residential neighborhoods would not be implemented.

All of the less-than-significant impacts of the proposed plans that are associated with population growth (e.g., public services, water demand, wastewater generation, etc.) would be greater under the existing plans than under the proposed plans because of the increased overall growth capacities, although these effects would continue to be considered less than significant under Alternative 1. The existing land use inconsistencies would not be addressed as under the proposed plans.

With continued implementation of the existing plans, greater development allowed than under the proposed plans would generate greater amounts of primary ozone precursors, reactive organic gases (ROG) and oxides of nitrogen (NO_X), than under the proposed plans. Land use changes under the proposed plans were found to result in a significant and unavoidable impact during construction with regard to air emissions. Given that the South Coast Air Basin is in nonattainment for criteria pollutants such as NO_X and PM, any substantial construction would result in exceedance of significance thresholds and air quality violations. Therefore, air pollutant emissions from development under Alternative 1 would be greater than under the proposed plans and would be significant and unavoidable.

In part because the CPAs are largely urbanized, is already served by public transit, and has a mix of residential and employment-generating uses, it is projected that improved technologies in the future combined with relatively modest levels of new development would allow future conditions under both the existing plans and the proposed plans to comply with the GHG reduction requirements of AB 32. The existing plans are less transit-oriented and contain less aggressive transportation management requirements than are included in the proposed plans, but traffic impacts would be substantially similar. However, because the proposed plans contain GHG-reduction measures that the existing plans do not, the generation of GHG emissions would be greater in Alternative 1 than those of the proposed plans.

Land use changes under the existing plans would affect a similar amount of land area as the proposed plans, although the proposed plans would concentrate future development in identified established commercial and transit corridors rather than in a more "spread-out" fashion than could occur under the existing plans. The proposed plans contain policies promoting establishment of a more walkable environment, with neighborhood services provided in close proximity to jobs and transit. The Sylmar Community Plan provides for mixed-use development around the existing Metrolink station. Each of these policies would promote reduction in vehicle miles traveled and result in fewer air quality, noise, greenhouse gas emissions, and traffic impacts than continuation of the existing plans.

Impacts associated with construction noise and vibration under Alternative 1 would be similar in terms of findings of significance to those discussed for the proposed plans, although slightly greater because construction activities could occur more widely distributed throughout the CPAs and affect a greater number of sensitive receptors compared to the proposed plans' concentration along existing commercial and transit corridors and protection of residential neighborhoods. The proposed plans would protect the character and historic nature of existing residential neighborhoods to a greater extent than continuation of the existing plans, given the increased number of policies aimed at protecting these resources in the proposed plans. As noted, above, the existing plans do not emphasize the use of alternative transportation modes, including transit, pedestrian, and bicycle travel, do not include requirements for aggressive TDM, and would not concentrate future development along major transit and commercial corridors (all of which reduce VMT).

Table 6-3 (Year 2030 Proposed Land Use Plan and Committed Roadway Network Statistics Comparison—Granada Hills–Knollwood Community Plan) and Table 6-4 (Year 2030 Proposed Land Use Plan and Committed Roadway Network Statistics Comparison—Sylmar Community Plan) show that the proposed plans and the existing plans have higher VMT and VHT than 2005 Traffic Conditions, but would result in essentially the same VMT and VHT.

Table 6-3 Year 2030 Proposed Land Use Plan and Committed Roadway Network Statistics Comparison—Granada Hills–Knollwood Community Plan

PM Peak Hour Data	*Existing Traffic Conditions*	*Current Land Use Plan*	*Proposed Land Use Plan*
VMT	243,454	367,290	371,390
VHT	5,804	11,329	12,264
Avg. Speed	42	32	30
Weighted V/C	0.598	0.898	0.948
No. of Links at LOS E or F	19	104	114
% of Links at LOS E or F	3%	14%	16%

SOURCE: Iteris, (2012).

Table 6-4 Year 2030 Proposed Land Use Plan and Committed Roadway Network Statistics Comparison—Sylmar Community Plan

PM Peak Hour Data	*Existing Traffic Conditions*	*Current Land Use Plan*	*Proposed Land Use Plan*
VMT	164,195	351,868	346,010
VHT	4,586	14,076	13,753
Avg. Speed	36	25	25
Weighted V/C	0.452	0.781	0.695
No. of Links at LOS E or F	13	41	35
% of Links at LOS E or F	2%	7%	6%

SOURCE: Iteris, (2012).

The data show that the proposed plans and the existing plans have higher VMT and VHT than existing traffic conditions. The proposed and existing plans have very similar arterial statistics. Both proposed plans would result in lower population, yet a slightly higher number of jobs, than the existing plans. As shown, continuation of the existing plans would result in ten fewer roadway links adversely affected in Granada Hills–Knollwood and six more roadway links adversely affected in Sylmar. Therefore, significant and unavoidable adverse impacts on roadway links would be slightly less under the existing Granada Hills–Knollwood plan than under the proposed plan and slightly greater under the existing Sylmar Plan than under the proposed plan.

Continuation of the existing plans would result in similar land uses being constructed over the life of the plans. However, this development would likely be more widespread throughout the CPAs rather than concentrated along transit and commercial corridors as provided for in the proposed plans. The VMT and VHT would be slightly less with continuation of the Granada Hills–Knollwood plan compared to

the proposed plan, and slightly greater with continuation of the existing Sylmar plan. However, because of the proposed patterns of land use development, which concentrates future development along existing transit and commercial corridors well served by alternative modes of transportation, it is likely that the VMT and VHT in the Granada Hills–Knollwood CPA would be less than projected, and likely less than under continuation of the existing plan. connected with VMT and VHT would continue to occur under the existing plan and would likely be greater than under the proposed plans, which would include impacts to air quality/greenhouse gas emissions, noise, and traffic.

6.4.3 Significant and Unavoidable Impacts That Would No Longer Occur

As the proposed plans include similar land use types and amounts as would be allowed under the existing plans, continuation of the existing plans would not reduce any of the significant and unavoidable impacts of the proposed plans. Future development could still adversely affect scenic vistas, damage scenic resources, degrade existing character or quality, create a new source of light and glare, or create substantial shadow. Future development would violate air quality standards and result in a cumulatively considerable net increase of a criteria pollutant, or expose sensitive receptors to substantial pollutant concentrations. Development under the existing plans would still contribute emissions of greenhouse gases, and result in construction noise, substantial adverse traffic impacts related to growth, and possible adverse effects on water supply. In fact, because continuation of the existing plans would likely result in greater VMT and VHT than the proposed plans, the significant and unavoidable impacts that are related to VMT and VHT, such as air quality, greenhouse gas emissions, noise, and traffic, would likely be greater than under the proposed plans. In addition, the existing plans could result in increased GHG emissions compared to the proposed plans, as they do not contain the specific GHG-reduction measures as the proposed plans. Therefore, continuation of the existing plans could result in worse environmental conditions in the CPAs than would occur under the proposed plans.

6.4.4 Relationship of Alternative 1: No Project Alternative (Continuation of Existing Plans) to the Project Objectives

The No Project Alternative represents the continuation of the existing community plans to guide future growth and development in the Granada Hills–Knollwood and Sylmar CPAs. Continued implementation of the existing plans would result in development within the CPAs that would not meet the project objectives of the proposed plans. Alternative 1 would not include new policies to focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, equestrian-keeping land uses, and open space; foster greater sustainability and integration of land use and transportation in the City; to protect the scale and character of existing residential neighborhoods; accommodate projected growth by providing for a range of housing options, mixed uses and commercial space for future employment opportunities; direct growth to transit hubs and corridors, increase transportation alternatives, create walkable streets, improve unitization of parking resources, plan for adequate public infrastructure and services, protect historic and cultural resources, preserve neighborhood character, and plan for increases to the housing supply; preserve and strengthen industrial areas and support environmentally sensitive industrial and employment centers that provide local and

regional jobs and bolster the community's economic and physical condition; enhance the positive characteristics of residential neighborhoods, including conservation of the existing rural, suburban, and equinekeeping residential scale and character, while providing a variety of housing opportunities; encourage historic preservation, retain land for employment uses; to create a more sustainable land use pattern by focusing change along existing transit and commercial corridors to create a complete, multimodal transportation system, allowing revitalization and job growth; include a comprehensive program of resource protection, enhancement, conservation, and re-use and provide mitigation of impacts of the project; or to further the goals of AB 32.

Continued implementation of the existing plans would not protect and conserve the CPAs' residential and Equinekeeping neighborhoods to the extent accomplished under the proposed plans. For most of the CPAs, the proposed plans preserve the existing pattern of uses and establish policies for protection and long-term conservation of established neighborhoods. In addition to concentrating growth along transportation and commercial corridors, the proposed plans would provide revenue to allow the City to provide the alternative transportation infrastructure required to achieve the City's goals for reduced per-capita vehicle miles traveled, improved traffic flow, and reduced greenhouse gas emissions.

Alternative 1 would not achieve the proposed plans objectives to promote sustainability and adverse impacts could be increased. This alternative would not be as effective at meeting the targets of AB 32 with respect to reduction in greenhouse gas emissions. Continuation of the existing plans would not result in creation of as many jobs to accommodate forecasted employment growth, falling well short of SCAG's 2030 employment forecast.

For the reasons listed above, this alternative would be generally inconsistent with, and would fail to achieve many of, the objectives of the proposed plans.

6.5 ALTERNATIVE 2: SCAG 2030 FORECAST

6.5.1 Description

Under this alternative, population, housing, and employment growth forecasts are analyzed for the year 2030. The Department of City Planning refined and adjusted the SCAG population and housing unit projections (employment projections were not adjusted) to be consistent with the Framework Element and other City policies, reflecting most of the projected growth in the City's regional and commercial centers. The City must then accommodate, or ensure the "capacity," for these projected levels of population, housing, and employment by providing development potential in its Community Plans. This alternative would result in a more scattered growth pattern based on existing zoning, in contrast to the proposed plans, which would focus future development along transit and commercial corridors.

Granada Hills–Knollwood

Table 6-5 (Comparison of Proposed Plan and Alternative 2—Granada Hills–Knollwood Community Plan) illustrates the build-out of the proposed plans compared to the adjusted SCAG 2030 forecasts.

Table 6-5 Comparison of Proposed Plan Capacity and Alternative 2—Granada Hills–Knollwood Community Plan

	Reasonable Capacity 2030 Proposed Plan	*2030 SCAG Forecasts*
Population	66,168	65,293
Housing	23,801	23,487
Employment	20,194	19,976

SOURCE: City of Los Angeles (2011).

The build-out of Alternative 2 would result in slightly lower population and fewer housing units and jobs. Under Alternative 2, projected growth through 2030 reflects a population of 65,293, housing units totaling 23,487, and 19,976 jobs. As Alternative 2 would result in substantially similar levels of development as under the proposed plan, many of the environmental impacts from implementation of this alternative would be substantially the same as identified for the proposed plan. However, this alternative would result in more dispersed growth patterns throughout the plan area. Because future growth in the CPA would not be concentrated around major transit and commercial corridors, this alternative could result in greater potential for historic and cultural resource impacts, such as the loss of noteworthy residences and/or courtyard homes, than under the proposed plan. It could also have greater impacts on existing residential neighborhoods, as the policies providing for transitions in height and massing, concentration of denser uses in existing commercial and transit corridors, and specifically protecting existing residential neighborhoods would not be implemented. The proposed plan contains policies promoting establishment of a more walkable environment, with neighborhood services provided in close proximity to jobs and transit. Each of these policies would promote reduction in vehicle miles traveled and result in fewer air quality, noise, greenhouse gas emissions, and traffic impacts than under Alternative 2. The existing land use inconsistencies would not be addressed as under the proposed plan.

All of the impacts of the proposed plan that are associated with population growth (e.g., public services, water demand, wastewater generation, etc.) would not be significantly different under Alternative 2 than under the proposed plan because overall growth would be similar. The significant and unavoidable effects identified for the proposed plan would continue to be significant and unavoidable, and could be worse under Alternative 2 because this alternative would not include all of the policies contained in the proposed plan to protect single-family neighborhoods, address visual quality and scenic views, reduce greenhouse gas emissions, and reduce VMT and VHT.

Impacts associated with construction under Alternative 2 would be similar in terms of findings of significance to those discussed for the proposed plan, although slightly greater because construction activities could occur more widely distributed throughout the CPA and affect a greater number of sensitive receptors compared to the proposed plan's concentration along existing commercial and transit corridors. The proposed plan would protect the character and historic nature of existing residential neighborhoods to a greater extent than Alternative 2, given the increased number of policies aimed at protecting these resources in the proposed plan. Implementation of Alternative 2 would not emphasize the use of alternative transportation modes, including transit, pedestrian, and bicycle travel, would not include requirements for aggressive TDM, and would not concentrate future development along major transit and commercial corridors (all of which reduce VMT).

Under Alternative 2, the integration of land use and transportation of the proposed plan would not be as likely to occur, and GHG emissions and air quality emissions could be greater than under the proposed plan. Compared to the proposed plan, Alternative 2 does not emphasize the use of alternative transportation modes, including transit, pedestrian, and bicycle travel, does not include requirements for aggressive TDM, and would not concentrate future development along major transit and commercial corridors (all of which reduce VMT).

Sylmar

Table 6-6 (Comparison of Proposed Plan and Alternative 2—Sylmar Community Plan) illustrates the build-out of the proposed plans compared to the adjusted SCAG 2030 forecasts.

Table 6-6 Comparison of Proposed Plan Capacity and Alternative 2—Sylmar Community Plan

	Reasonable Capacity 2030 Proposed Plan	*2030 SCAG Forecasts*
Population	89,378	85,993
Housing	24,827	23,887
Employment	26,389	25,660

The build-out of Alternative 2 would result in lower population and fewer housing units and jobs. Under Alternative 2, projected growth through 2030 reflects a population of 85,993, housing units totaling 23,887, and 25,660 jobs. As Alternative 2 would result in substantially similar levels of development as under the proposed plan, many of the environmental impacts from implementation of this alternative would be substantially the same as identified for the proposed plan. However, this alternative would result in more dispersed growth patterns throughout the plan area. Because future growth in the CPA would not be concentrated around major transit and commercial corridors, this alternative could result in greater potential for historic and cultural resource impacts, such as the loss of noteworthy residences and/or courtyard homes, than under the proposed plan. It could also have greater impacts on existing residential neighborhoods, as the policies providing for transitions in height and massing, concentration of denser uses in existing commercial and transit corridors, and specifically protecting existing residential neighborhoods would not be implemented. The proposed plan contains policies promoting establishment of a more walkable environment, with neighborhood services provided in close proximity to jobs and transit. The Sylmar Community Plan provides for mixed-use development around the existing Metrolink station. Each of these policies would promote reduction in vehicle miles traveled and result in fewer air quality, noise, greenhouse gas emissions, and traffic impacts than under Alternative 2. The existing land use inconsistencies would not be addressed as under the proposed plan.

All of the impacts of the proposed plan that are associated with population growth (e.g., public services, water demand, wastewater generation, etc.) would not be significantly different under Alternative 2 than under the proposed plan because overall growth would be similar. The significant and unavoidable effects identified for the proposed plan would continue to be significant and unavoidable, and could be worse under Alternative 2 because this alternative would not include all of the policies contained in the

proposed plan to protect single-family neighborhoods, address visual quality and scenic views, reduce greenhouse gas emissions, and reduce VMT and VHT.

Impacts associated with construction under Alternative 2 would be similar in terms of findings of significance to those discussed for the proposed plan, although slightly greater because construction activities could occur more widely distributed throughout the CPA and affect a greater number of sensitive receptors compared to the proposed plan's concentration along existing commercial and transit corridors. The proposed plan would protect the character and historic nature of existing residential neighborhoods to a greater extent than Alternative 2, given the increased number of policies aimed at protecting these resources in the proposed plan. Implementation of Alternative 2 would not emphasize the use of alternative transportation modes, including transit, pedestrian, and bicycle travel, would not include requirements for aggressive TDM, and would not concentrate future development along major transit and commercial corridors (all of which reduce VMT).

Under Alternative 2, the integration of land use and transportation of the proposed plan would not be as likely to occur, and GHG emissions and air quality emissions could be greater than under the proposed plan. Compared to the proposed plan, Alternative 2 does not emphasize the use of alternative transportation modes, including transit, pedestrian, and bicycle travel, does not include requirements for aggressive TDM, and would not concentrate future development along major transit and commercial corridors (all of which reduce VMT).

6.5.2 Mitigation That Would No Longer Be Required

All future development projects that are proposed under the Community Plan and subject to discretionary approval would be subject to conditions of approval and/or project-specific mitigation measures that would be identified at that time.

6.5.3 Significant and Unavoidable Impacts That Would No Longer Occur

As the proposed plans include similar land use types and amounts as would be allowed under the existing plans, implementation of Alternative 2 would not reduce any of the significant and unavoidable impacts of the proposed plans. Future development could still adversely affect scenic vistas, damage scenic resources, degrade existing character or quality, create a new source of light and glare, or create substantial shadow. Future development would violate air quality standards and result in a cumulatively considerable net increase of a criteria pollutant, or expose sensitive receptors to substantial pollutant concentrations. Development under Alternative 2 would still contribute emissions of greenhouse gases, and result in construction noise, substantial adverse traffic impacts related to growth, and possible adverse effects on water supply. In fact, because implementation of Alternative 2 would likely result in greater VMT and VHT than the proposed plans, the significant and unavoidable impacts that are related to VMT and VHT, such as air quality, greenhouse gas emissions, noise, and traffic, would likely be greater than under the proposed plans. In addition, the existing plans could result in increased GHG emissions compared to the proposed plans, as they do not contain the specific GHG-reduction measures

as the proposed plans. Therefore, implementation of Alternative 2 could result in worse environmental conditions in the CPAs than would occur under the proposed plans.

Alternative 2 would involve new land uses of similar types as the proposed plan, at similar intensity for population and housing and some increase in the number of jobs provided. Alternative 2 would not reduce any of the significant and unavoidable impacts of the proposed plan to less than significant, as the levels of development would be substantially the same.

6.5.4 Relationship of Alternative 2 to the Project Objectives

Alternative 2 represents build-out in the Granada Hills–Knollwood and Sylmar CPAs according to adjusted 2030 SCAG forecasts. Implementation of this Alternative would result in development within the CPAs that would not meet the project objectives of the proposed plans. Alternative 2 would not include new policies to focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, equestrian-keeping land uses, and open space; foster greater sustainability and integration of land use and transportation in the City; to protect the scale and character of existing residential neighborhoods; accommodate projected growth by providing for a range of housing options, mixed uses and commercial space for future employment opportunities; direct growth to transit hubs and corridors, increase transportation alternatives, create walkable streets, improve unitization of parking resources, plan for adequate public infrastructure and services, protect historic and cultural resources, preserve neighborhood character, and plan for increases to the housing supply; preserve and strengthen industrial areas and support environmentally sensitive industrial and employment centers that provide local and regional jobs and bolster the community's economic and physical condition; enhance the positive characteristics of residential neighborhoods, including conservation of the existing rural, suburban, and equinekeeping residential scale and character, while providing a variety of housing opportunities; encourage historic preservation, retain land for employment uses; to create a more sustainable land use pattern by focusing change along existing transit and commercial corridors to create a complete, multimodal transportation system, allowing revitalization and job growth; include a comprehensive program of resource protection, enhancement, conservation, and re-use and provide mitigation of impacts of the project; or to further the goals of AB 32.

Implementation of Alternative 2 would not protect and conserve the CPAs' residential and Equinekeeping neighborhoods to the extent accomplished under the proposed plans. For most of the CPAs, the proposed plans preserve the existing pattern of uses and establish policies for protection and long-term conservation of established neighborhoods. In addition to concentrating growth along transportation and commercial corridors, the proposed plans would provide revenue to allow the City to provide the alternative transportation infrastructure required to achieve the City's goals for reduced per-capita vehicle miles traveled, improved traffic flow, and reduced greenhouse gas emissions.

Alternative 2 would not achieve the proposed plans objectives to promote sustainability and adverse impacts could be increased. This alternative would not be as effective at meeting the targets of AB 32 with respect to reduction in greenhouse gas emissions. For the reasons listed above, this alternative would be generally inconsistent with, and would fail to achieve many of, the objectives of the proposed plans.

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the reasonable range of potentially feasible alternatives that are evaluated. This would ideally be the alternative that results in fewer (or no) significant and unavoidable impacts. As noted, above, there is no feasible development alternative that would reduce the significant impacts of the proposed plans, many of which are related to construction activities associated with future development or the uncertainty of the specifics of future development. Both Alternative 1 and Alternative 2 would allow substantially similar development, more widely dispersed throughout the CPAs and potentially intruding into existing neighborhoods compared to the proposed plans. As noted, above, both alternatives would likely worsen the significant impacts of the proposed plans because they would not reduce VMT and VHT or further the goals of AB 32. Thus, the environmentally superior alternative is implementation of the proposed plans. Table 6-7 (Comparison of Impacts–Proposed Plans and Alternatives [2030] to Existing [2005] Conditions) compares the environmental effects of the proposed plan and the alternatives against existing conditions.

Table 6-7 Comparison of Impacts—Proposed Plans and Alternatives (2030) to Existing (2005) Conditions

Environmental Impacts	*Proposed Plans*	*Alternative 1—Continuation of Existing Plans*	*Alternative 2—SCAG 2030 Forecast*
Aesthetics	S	S≈	S≈
Air Quality	S	S >	S >
Biological Resources	L	L≈	L≈
Cultural Resources	L	L >	L >
Geology/Soils and Mineral Resources	L	L ≈	L≈
Greenhouse Gas Emissions	S	S >	S >
Safety/Risk of Upset	L	L ≈	L ≈
Hydrology/Water Quality	L	L ≈	L ≈
Land Use/Planning	L	L ≈	L ≈
Noise	S	S >	S >
Population, Housing, and Employment	L	L ≈	L ≈
Public Services and Recreation	L	L ≈	L ≈
Transportation/Traffic	S	S >	S >
Utilities/Service Systems	L	L ≈	L ≈

S = Significant and Potentially Significant

L = Less than Significant

L ≈ Less than Significant and substantially similar to the proposed plan

L> Less than Significant but potentially greater than the proposed plan

S> Significant and Potentially Significant, and potentially greater than the proposed plan