ATTACHMENT A

Findings of Fact and Statement of Overriding Considerations

Pursuant to CEQA Guidelines Section 15091, 15093 and Public Resources Code Section 21081

Los Angeles Aerial Rapid Transit Project

February 2024

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ABBREVIATIONS/ACRONYMS

°F	degrees Fahrenheit
µg/L	Microgram per Liter
µg/m^3	Micrograms per Cubic Meter
3S	Tricable Detachable Gondola System
AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACC	Advanced Clean Cars
ACM	Asbestos Containing Material
ACRES	Assessment, Cleanup, and Redevelopment Exchange System
ADA	Americans with Disabilities Act
ADP	Alameda District Specific Plan
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Air Dispersion Model
Alquist-Priolo Act	Alquist-Priolo Earthquake Fault Zoning Act
ALS	Advanced Life Support
ANSI	American National Standards Institute
APCD	Air Pollution Control District
APE	Area of Potential Effect
API	Area of Potential Impact
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ART	Aerial Rapid Transit
ARTIC	Anaheim Regional Transportation Intermodal Center
ARTT LLC	Aerial Rapid Transit Technologies LLC
ASCE	American Society of Civil Engineers
ASTM	American Society of Testing and Materials
ATCM	Airborne Toxic Control Measure
AUF	Acoustic Use Factor
AVO	Average Vehicle Occupancy
AVTA	Antelope Valley Transit Authority
BACM	Best Available Dust Control Measures
Basin Plan	Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties

bgs	Below Ground Surface
BMP	Best Management Practice
BRT	Bus Rapid Transit
BSA	Biological Survey Area
BTEX	Benzene, Toluene, Ethylbenzene and Xylene
BTU	British Thermal Unit
C & D	Construction and Demolition
CA MUTCD	California Manual of Uniform Traffic Control Devices
CAA	Clean Air Act
CAAP	Climate Action and Adaptation Plan
CAAQS	California Ambient Air Quality Standard
CAFE	Corporate Average Fuel Economy
Cal EPA	California Environmental Protection Agency
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CALFIRE	California Department of Forestry and Fire Protection
CalGEM	California Department of Conservation Geologic Energy Management Division
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CAM	The Chinese American Museum
CAP	Criteria Air Pollutant
CARB	California Air Resources Board
CASGEM	California Statewide Groundwater Elevation Monitoring
CASP	Cornfield-Arroyo Seco Specific Plan
CBC	California Building Code
CC&Rs	Covenants, Conditions, Restrictions and Easement for Chavez Ravine
CCAA	California Clean Air Act
CCCC	California Climate Change Center
CCR	California Code of Regulations
cd/m^2	Candelas per Square Meter
CDFW	California Department of Fish and Wildlife
CE	Commuter Express

CEC	California Energy Commission
Central Basin	Central Subbasin
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERS	California Environmental Reporting System
CESA	California Endangered Species Act
CFC	California Fire Code
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH_4	Methane
CHL	California Historical Landmarks
CHRIS	California Historical Resources Inventory System
CLA	Chief Legislative Analyst
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	CO_2 Equivalents
CoIWMP	Countywide Integrated Waste Management Plan
Cortese	Hazardous Waste and Substances Sites
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRMMP	Cultural Resources Monitoring and Mitigation Plan
CRPR	California Rare Plant Ranks
CTMP	Construction Traffic Management Plan
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CVC	California Vehicle Code
CWA	Clean Water Act
CY	Cubic Yards
dB	Decibel

dBA	A-Weighted Decibel
DBE	Disadvantaged Business Enterprises
DBH	Diameter at Breast Height
DCA	Department of Cultural Affairs
DEIR	Draft Environmental Impact Report
DGS	Department of General Services
DHS	Department of Health Services
DoD	Department of Defense
DOORS	Diesel Off-Road Online Reporting System
DPM	Diesel Particulate Matter
DPR	California Department of Parks and Recreation
DSE	Dodger Stadium Express
DTLA 2040	Downtown Community Plan
DTSC	Department of Toxic Substances Control
DVBE	Disabled Veteran Business Enterprises (DVBE)
DWR	Department of Water Resources
EDR	Environmental Data Resources, Inc.
EFCs	Equity Focus Communities
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
El Pueblo	El Pueblo de Los Angeles
EMD	Emergency Management Department
EMS	Emergency Medical Service
EOB	Emergency Operations Board
EOO	Emergency Operations Organization
EOP	Emergency Operation Plan
EPA	Environmental Protection Agency
ESA	Endangered Species Act (from Biological Resources)
ESA	Environmental Site Assessment (from Hazards and Hazardous Materials)
EV	Electric Vehicle
fc	Footcandles
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zones

FHWA	Federal Highway Administration
FIRMS	Flood Insurance Rate Maps
FMP	Floodplain Management Plan
FPP	Fire Protection Program
ft	Feet
FT	Foothill Transit
FTA	Federal Transit Administration
General Plan	City of Los Angeles General Plan
GHG	Greenhouse Gas
GIS	Geographic Information System
GPA	GPA Consulting
GPD	Gallons per Day
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWh	Gigawatt Hours
GWP	Global Warming Potential
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HCD	California Department of Housing and Community Development
HCM	Los Angeles Historic-Cultural Monument
HDM	Highway Design Manual
HEPA	High-Efficiency Particulate Air
HFC	Hydrofluorocarbons
HIC	Non-Cancer Chronic Hazard Index
HIN	High Injury Network
HMBP	Hazardous Materials Business Plan
HOV	High Occupancy Vehicle
hp	Horsepower
HPOZ	Historic Preservation Overlay Zone
HRA	Health Risk Assessment
HRTR	Historical Resources Technical Report
HSC	Health and Safety Code
HSR	California High-Speed Rail
HVAC	Heating, Venting, and Air Conditioning

Hz	Hertz
I-5	Interstate 5
IEPR	Integrated Energy Policy Report (IEPR)
IES	Illuminating Engineering Society
IFC	The International Fire Code
IGP	Industrial General Permit
IPaC	Information for Planning and Conservation
IRP	Integrated Resource Plan
ISTEA	Intermodal Surface Transportation Efficiency Act
ITS	Intelligent Transportation Systems
Kizh Nation	Gabrieleño Band of Mission Indians – Kizh Nation
KOP	Key Observation Points
kWh	Kilowatt Hours
LA ART LLC	LA Aerial Rapid Transit Technologies LLC
LABOE	Los Angeles Bureau of Engineering
LACDPW	Los Angeles County Department of Public Works
LACDRP	Los Angeles County Department of Regional Planning
LACMTA	Los Angeles County Metropolitan Transportation Authority
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFC	Los Angeles Fire Code
LAFC	Los Angeles Football Club
LAFD	City of Los Angeles Fire Department
LAGBC	Los Angeles Green Building Code
LAHCM	Los Angeles Historic-Cultural Monument
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARAP	Los Angeles Department of Recreation and Parks
LARIAC	Los Angeles Region Imagery Acquisition Consortium
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	Los Angeles Sanitation & Environment Department
LASD	Los Angeles County Sheriff's Department
LASHP	Los Angeles State Historic Park

LAUS	Los Angeles Union Station
LAUSD	Los Angeles Unified School District
LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LBP	Lead-based paints
lbs	Pounds
LCFS	Low Carbon Fuel Standards
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
LinkUS	Link Union Station Project
LOS	Level of Service
LOSSAN	Los Angeles-San Diego-San Lui Obispo Rail Corridor
LOTUS	Lotus v. Department of Transportation
LRA	Local Responsibility Area
LRT	Light Rail Transit
LRTP	Long Range Transportation Plan
LSAA	Lake or Streambed Alteration Agreement
LST	Localized Significance Threshold
LST	Localized Screening Threshold (from Alternatives)
LU	Landscape Units
LUST	Leaking Underground Storage Tank
L_v	Vibration Velocity Level
MBS	Moving Beyond Sustainability Plan
MBTA	Migratory Bird Treaty Act
MCL	Maximum Contaminant Level
Metro	Los Angeles County Metropolitan Transportation Authority
MFR	Multi-Family Residential
mg/kg	Milligrams per Kilogram
MGD	Million Gallons per Day
MICR	Maximum Incremental Cancer Risk
MLB	Major League Baseball
MLD	Most Likely Descendant

MM	Mitigation Measure(s)
MMBTu	Million British Thermal Unit
MOA	Mode of Access
MPO	Metropolitan Planning Organization
MRZ	Mineral Resources Zone
MS4	Municipal Separate Storm Sewer Systems
msl	Mean Sea Level
MT	Metric Tons
MT CO2e/year	Metric Tons of Carbon Dioxide Equivalent Per Year
MTA	Metropolitan Transit Authority
MUTCD	Manual on Uniform Traffic Control Devices
MW	Megawatts
MWD	Metropolitan Water District
MWh	Megawatt Hours
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFPA	National Fire Protection Association
NHM	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic Safety Administration
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO_X	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
NSR	Noise-Sensitive Receptors
O_3	Ozone
OCS	Overhead Contact Lines
OCTA	Orange County Transportation Authority

OEHHA	Office of Environmental Health Hazard Assessment
OHSU	Oregon Health and Science University
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OVA	Organic Vapor Analyzer
Park General Plan	Los Angeles State Historic Park General Plan
Pb	Lead
PDF	Project Design Feature
PFC	Perfluorocarbons
pLAn	Sustainable City Plan
PM	Particulate Matter
PM_{10}	Respirable Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
PPHPD	Passengers Per Hour Per Direction
ppm	Parts per Million
ppmv	Parts per Million by Volume
PPOP	Plans, Programs, Ordinances, or Policies
PPV	Peak Particulate Velocity
PRC	Public Resources Code
PRMMP	Paleontological Resources Monitoring and Mitigation Plan
PUC	Public Utilities Code
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission
REC	Recognized Environmental Condition
RIO	Los Angeles River Improvement Overlay
RMS	Root Mean Square
ROG	Reactive Organic Gases
ROW	Right-of-Way
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Los Angeles Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient

SANBAG	San Bernardino Association of Governments
SARA	Superfund Amendment and Reauthorization Act
SB	Senate Bill
SBE	Small Business Enterprises
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
Scoping Plan	Climate Change Scoping Plan: A Framework for Change
SCRIP	Southern California Regional Interconnector Project
SCRRA	Southern California Regional Rail Authority
SCS	Sustainable Communities Strategy
SCT	Santa Clarita Transit
SEA	Significant Ecological Area
sf	Square Feet
SF_6	Sulfur Hexafluoride
SFR	Single-Family Residential
SGMA	Sustainable Groundwater Management Act
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SLA	Surplus Land Act
SLF	Sacred Lands File
SLIC	Spills, Leaks, Investigations, and Cleanups
SLTRP	Strategic Long-Term Resource Plan
SMMC	Santa Monica Mountains Conservancy
SO_2	Sulfur Dioxide
SoCalGas	Southern California Gas Company
SOHP	State Office of Historic Preservation
SOP	Standardized Operating Procedures
SO_X	Sulfur Oxides
SP	Special Publication
SPL	Sound Pressure Levels
SR	State Route
SR-110	State Route 110
SRA	State Responsibility Area

SSC	Species of Special Concern
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflow Response Plan
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act
SUSMP	Standard Urban Stormwater Mitigation Plan
SWITRS	Statewide Integrated Traffic Records System
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TAG	Transportation Assessment Guidelines
TCE	Temporary Construction Easements
TCM	Transportation Control Measures
TCR	The Climate Registry
TCR	Tribal Cultural Resource
TCO	Traffic Control Officer
TDS	Total Dissolved Solid
TIMS	Transportation Injury Mapping System
TNC	Transportation Network Company
TNM	Traffic Noise Model
TPH	Total Petroleum Hydrocarbons
TRB	Transportation Research Board
TSM	Transportation Systems Management
TVM	Ticket Vending Machines
UCLA	University of California, Los Angeles
UDOT	Utah Department of Transportation
UPRR	Union Pacific Railroad
USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	United States Geological Survey
UST	Underground Storage Tank
VCP	Voluntary Cleanup Program

VCTC	Ventura County Transportation Commission
VdB	Decibel Notation for Vibration Level
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WBE	Women Business Enterprises
WDR	Waste Discharge Requirements
WL	California Department of Fish and Wildlife Watch List
WMP	Watershed Management Plan
WQCMPUR	Water Quality Compliance Master Plan for Urban Runoff
WRD	Water Replenishment District of Southern California
WSAB	West Santa Ana Branch Transit corridor
ZET	Zero Emissions Transit
ZEV	Zero Emission Vehicle
ZIMAS	Zoning Information and Map Access System
ZNE	Zero Net Energy

1. INTRODUCTION

In accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [Pub. Resources Code] §§ 21000–21189) and the CEQA Guidelines (14 Cal. Code Regs., §§ 15000–15387), the Los Angeles County Metropolitan Transportation Authority (Metro) prepared an Environmental Impact Report for the Los Angeles Aerial Rapid Transit Project (Project). In preparing the Environmental Impact Report, Metro followed an established process to identify the environmental issues to be analyzed and solicit input from the public, stakeholders, elected officials, and other affected parties. The Draft EIR analyzed the Project's potential environmental impacts, and in turn, the Final EIR made minor clarifications and otherwise provided additional information that supported the Draft EIR's impact conclusions. As such, these Findings reflect the analysis provided in both the Draft and Final EIR, inclusive of technical appendices and errata (collectively referred to as the "EIR" herein).

Implementation of the Project would result in temporary significant unavoidable impacts related to construction noise and vibration (human annoyance) and no feasible mitigation measures were identified to mitigate these impacts to a less-than-significant level. In accordance with CEQA, Metro, in adopting these Findings of Fact, also adopts a Mitigation Monitoring and Reporting Program (MMRP) that meets the requirements of Public Resources Code section 21081.6 by providing for the implementation and monitoring of measures to mitigate the potentially significant effects of the Project. The MMRP is included in Section 7.0 of the Final EIR and is provided as Attachment C to the Metro Board Report.

In accordance with the CEQA Guidelines, Metro adopts these findings as part of the approval of the Project. Pursuant to Public Resources Code section 21082.1(c)(3) and CEQA Guidelines section 15090, Metro certifies that the Final EIR:

1) Has been completed in compliance with the CEQA;

2) The Final EIR was presented to the Board of Directors and that the Board reviewed and considered the information contained in the Final EIR prior to approving the Project; and

3) The Final EIR reflects Metro's independent judgment and analysis.

Pursuant to CEQA Guidelines section 15093, if a project's EIR and administrative record substantiate that the project would result in significant and unavoidable impacts, then the lead agency is required to balance the project's significant and unavoidable impacts against its economic, legal, social, technological, or other benefits including regional or statewide benefits. If these benefits outweigh the significant and unavoidable impacts, then the significant and unavoidable impacts may be deemed acceptable. In such a case, the lead agency must state, in writing, the specific reasons that support this conclusion. The Statement of Overriding Considerations in Section 11 of this Findings of Fact and Statement of Overriding Considerations presents the Project's potential significant and unavoidable impacts followed by Metro's findings as to why the Project's benefits outweigh these significant and unavoidable impacts. In accordance with the CEQA Guidelines, Metro adopts the Statement of

Overriding Considerations and concludes that the overall benefits of the Project outweigh the significant and unavoidable temporary impact.

2. ORGANIZATION

The Findings of Fact and Statement of Overriding Considerations is comprised of the following sections after Section 1 Introduction and this Section 2 Organization:

Section 3. Description of the project, design and use options, and objectives

Section 4. Statutory requirements of the findings and a record of proceedings

Section 5. Significant impacts of the Project that cannot be mitigated to a less-than-significant level

Section 6. Potentially significant impacts of the Project that can be mitigated to a less-than-significant level

Section 7. Environmental impacts that are less than significant

Section 8. Environmental resources to which the Project would have no impact

Section 9. Potential cumulative impacts

Section 10. Alternatives analyzed in the evaluation of the Project and findings on mitigation measures

Section 11. Statement of Overriding Considerations

3. DESCRIPTION OF THE PROJECT, DESIGN AND USE OPTIONS, AND OBJECTIVES

3.1 PROJECT DESCRIPTION

The Project would connect Los Angeles Union Station (LAUS) to Dodger Stadium property via an aerial gondola system. The Project would also include an intermediate station at the southernmost entrance of the Los Angeles State Historic Park, as well as a non-passenger junction and three cable-supporting towers at various locations along the approximately 1.2-mile alignment, and gondola cabins. The Project would provide an aerial rapid transit option for visitors to Dodger Stadium, while also providing access between the Dodger Stadium property, the surrounding communities, including Chinatown, Mission Junction, Elysian Park, and Solano Canyon, and the Los Angeles State Historic Park, to the regional transit system accessible at LAUS. The Project would also provide pedestrian improvements, including hardscape and landscape improvements, as well as amenities at the Los Angeles State Historic Park.

The Project would generally be located within public right-of-way (ROW), or on publicly owned property. From LAUS, the Project alignment would follow Alameda Street and then continue along

Spring Street in a northeast direction through the community of Chinatown to the southernmost corner of the Los Angeles State Historic Park. The alignment would then continue northeast over the western edge of the Los Angeles State Historic Park and the Los Angeles County Metropolitan Transportation Authority (Metro) L (Gold) Line[1] to the intersection of North Broadway and Bishops Road. At this intersection, the Project alignment would turn and continue northwest following Bishops Road toward its terminus at Dodger Stadium, located in the Elysian Park community.

The Project would utilize a detachable "3S," or tricable, technology that enables larger passenger cabins and more carrying capacity than other available aerial technology to support the transit demand created during Dodger games and events at Dodger Stadium. The aerial technology that comprises an aerial gondola system consists of major components connected by the cables (ropeway). The major components of the Project include stations where passengers would enter and exit the system, a non-passenger junction where the alignment turns, towers to support the cables, and cabins in which the passengers ride.

When complete, the Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes. The Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

Table 3-1 provides an overview of the station and junction components associated with the Project. **Table 3-2** provides an overview of the proposed towers associated with the Project. A more detailed description of the Project is provided in Section 2.0, Project Description, of the Draft EIR and Section 3.0, Project Description, of the Final EIR.

Table 3-1: Project Station and Junction Details

Station Name	Location	Passenger Station	Station Size (square feet)	Canopy Size (square feet)	Height of Platform (feet above-ground)	Height of Station (feet above-ground)
Alameda Station	Alameda Street between Los Angeles Street and Cesar E. Chavez Avenue	Yes	15,279	19,217[a]	31	78
Chinatown/ State Park Station[b]	Along Spring Street within the southernmost point of Los Angeles State Historic Park	Yes	22,361[c]	15,212	50	98

[1] Subsequent to the release of the Draft EIR, on June 16, 2023, in connection with the opening of Metro's Regional Connector, Metro changed the name of the L Line (Gold). The part of the former L Line (Gold) between Little Tokyo/Arts District Station and APU/Citrus College station became part of the A Line (Blue), and the part of the former L Line (Gold) between Little Tokyo/Arts District Station and Atlantic Station became part of the E Line (Gold). The proposed Project area includes the part of the former L Line (Gold) that is now part of the A Line (Blue). References in the Findings of Fact and Statement of Overriding Considerations to the L Line (Gold) refer to the A Line (Blue).

Broadway Junction	Intersection of North Broadway and Bishops Road	No	12,615	13,331	50	98
Dodger Stadium Station	Dodger Stadium parking lot	Yes	37,395[d]	16,001	At-Grade	74

[a.] The canopy size square footage for Alameda Station includes approximately 3,064 sf or canopy over the vertical circulation.

[b.] Chinatown/State Park Station also includes 1,419 sf of Park Amenities.

[c.] The station size square footage for Chinatown/State Park Station includes an approximately 8,063 sf mezzanine.

[d.] The station size square footage for Dodger Stadium Station includes an approximately 24,650 sf subterranean area below the station's platform for storage and maintenance of cabins, as well as staff break rooms, lockers, and parts storage areas.

Table 3-2: Project Tower Details

Tower Name	Location	Height to Top of Tower	Cable Height
Alameda Tower	Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue	195 feet	175 feet
Alpine Tower	Northeast corner of Alameda Street and Alpine Street on a City-owned parcel	195 feet	175 feet
Stadium Tower	Private property north of Stadium Way	179 feet	159 feet

3.2 DESIGN AND USE OPTIONS

While not proposed as part of the proposed Project, design and use options to the proposed Project were considered in the Draft EIR to explore potential minor design variations to various Project components. Each design and use option offers a variation to the proposed Project. The Design and Use Options are described in detail in Chapter 6.0, Design and Use Options, of the Draft EIR, which provides the potential environmental effects of the design and use options for Metro to consider the environmental consequences of adopting one or more of such design and use options. All design and use options could be implemented individually, together, or in any combination without changing the significance conclusions reached in the EIR for the proposed Project.

The design and use options represent minor variations to the proposed Project, thus qualifying as design and use options instead of project alternatives. Pursuant to Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives. The Project Alternatives were analyzed in Chapter 4.0, Alternatives, of the Draft EIR.

For the proposed Project, five design and use options were considered in the Draft EIR:

- Design Option A: Broadway Junction Shift to Avoid 451 E. Savoy
- Design Option B: Single Tower along Alameda Street
- Design Option C: Chinatown/State Park Station with Increased Height

- Use Option D: Chinatown/State Park Station as a Non-passenger Junction
- Design and Use Option E: Pedestrian Bridge at the Los Angeles State Historic Park

The five design and use options and their potential environmental impacts relative to the respective Project component of the proposed Project described in Section 2.5 of the Draft EIR's Project Description are described in the following sections, with greater detail provided in Section 6.0, Design and Use Options, of the Draft EIR. The Project Sponsor has requested that Metro approve the proposed Project with Design Option A.

3.2.1 Design Option A

Design Option A includes a shift in the overall Project alignment between the Broadway Junction and Dodger Stadium Station to avoid aerial rights requirements over 451 E. Savoy Street. Under Design Option A, the alignment would shift further to the west from 451 E. Savoy Street while headed north from the Broadway Junction. This shift would result in the alignment crossing over a small portion of Cathedral High School.

Project Components

Design Option A includes changes to the Project components of Broadway Junction, Stadium Tower, and Dodger Stadium Station. Under the proposed Project, the Broadway Junction would be approximately 227 feet long, 60 feet wide, and 98 feet high at its tallest point, with the platform approximately 50 feet above the ground. Design Option A would maintain similar dimensions for the Broadway Junction, but would shift it approximately four degrees to avoid aerial rights over 451 E. Savoy Street. As a result of this alignment shift, the location of Stadium Tower would also slightly shift 115 feet uphill to the west/northwest from its location under the proposed Project. The tower would remain on the hillside private property north of Stadium Way, between the Downtown Gate and SR-110. Because of the shift uphill and to account for the change in grade, the height of the Stadium Tower would decrease by five feet in comparison to the proposed Project. There is no net change to the tower height above sea level, as the shift uphill would be neutralized by the decreased height of the tower. As a result of the shift, the Stadium Tower would be located on an area of 15 percent slope, would require the relocation of a water valve, and would require encroachment into a City of Los Angeles Water easement. Design Option A would also require Dodger Stadium Station be located farther south than the proposed Project station design location. Because of the change in location, access to the cabin maintenance area may require the addition of a switchback and steeper approach than the proposed Project due to the steeper slope of the landscaped berm at this location. The Dodger Stadium Station at this location would also require removal of 337 parking spaces at the Dodger Stadium property (compared to 194 for the proposed Project) and requires a longer walk for proposed Project passengers to travel between the Dodger Stadium Station and Dodger Stadium.

Impacts

All operational impacts under Design Option A would be similar to the proposed Project and less than significant. Regarding construction impacts, Design Option A does not materially differ in overall dimension, location, building material, or construction technique as compared to the

proposed Project. Accordingly, Design Option A would have similar impacts to the proposed Project in the following CEQA impact areas: Agriculture and Forestry Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; Mineral Resources; Noise; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; and Wildfire. Any mitigation measures required for the respective proposed Project components would also be required for those of Design Option A. However, because of the slight variance in location and construction times from the proposed Project, there is potential for variations in impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology/Soils, Greenhouse Gas Emissions, Land Use and Planning, and Utilities and Service Systems. The CEQA impact areas that may differ from the proposed Project are discussed in detail in Section 6.2, Design Option A, of the Draft EIR and summarized below.

Aesthetics

Potential impacts to aesthetics arising from Design Option A are associated with the proposed height increase and shift in location of the Stadium Tower. However, similar to the proposed Project, the analysis determined that Design Option A would not impact scenic vistas, substantially diminish the broad scenic view or views of prominent visual features, and would not conflict with applicable zoning or other regulations governing scenic quality. Furthermore, the Stadium Tower location shift under Design Option A would not introduce new sources or light and glare, and no impacts with respect to light and glare would occur. The uphill shift of the Stadium Tower under Design Option A could result in slightly different shading impacts compared to the Stadium Tower of the proposed Project. However, any shadow impacts from the Stadium Tower under Design Option A would be less than significant. Therefore, similar to the proposed Project, impacts with respect to aesthetics under Design Option A would be less than significant.

Air Quality

Potential impacts to air quality arising from Design Option A are associated with an extended construction schedule. Design Option A would add approximately 12 additional weeks of construction at the Stadium Tower for a total of 62 weeks of construction, as compared to 50 weeks of construction for the proposed Project. Similarly, Design Option A would add an additional four weeks of construction at Dodger Stadium Station, for a total of 101 weeks of construction, as compared to 97 weeks of construction for the proposed Project. Accordingly, Design Option A would generate increased criteria pollutant emissions during construction compared to the proposed Project. However, construction emissions under Design Option A would be well below applicable South Coast Air Quality Management District (SCAQMD) mass daily significance thresholds and localized significant thresholds (LSTs) for all criteria pollutants. While Design Option A would result in increased construction emissions when compared to the proposed Project, impacts would remain less than significant overall.

Biological Resources

Potential impacts to biological resources arising from Design Option A are associated with tree removal adjacent to Stadium Tower. Stadium Tower is the only component of Design Option A that would result in impacts to biological resources that differ from the proposed Project. Under the proposed Project, 55 significant trees would be removed from the Stadium Tower site,

including the fire buffer zone. Similarly, under Design Option A, a similar number of significant trees would be removed at the Stadium Tower location, including the fire buffer zone. None of these inventoried trees were identified as City-ordinance protected trees. Similar to the proposed Project, these tree removals have the potential to impact bat roosts and nesting birds. Accordingly, Design Option A would implement Mitigation Measure **MM-BIO-A** (avoid and minimize project related impacts to special-status and/or rooster bat species) and Mitigation Measure **MM-BIO-B** (avoid and minimize project related impacts to nesting birds). Implementation of Mitigation Measure **MM-BIO-A** and Mitigation Measure **MM-BIO-B** would reduce impacts to biological resources to less than significant with mitigation.

Cultural Resources

Potential impacts to cultural resources arising from Design Option A are associated with the Broadway Junction. Broadway Junction is the only component of Design Option A that would result in impacts that differ from the proposed Project. The shift of the Broadway Junction under Design Option A would cross over a portion of Cathedral High School property. Cathedral High School is a historical resource. As such, similar to the proposed Project, Design Option A would introduce new visual features to the historical resource's setting. However, the change would not constitute a significant impact on the historical resource as the existing character of the built environment in the immediate vicinity is not cohesive and the setting outside of the campus grounds does not contribute to its historical significance. Furthermore, views from within the campus boundary already include modern buildings and structures. The location of the components of Design Option A would not directly interrupt the views from the campus, nor would they impact any other important features of the historical resource's larger setting. The resource would continue to convey its individual significance within the context of an institutional development, and its existing physical integrity and character-defining features would remain intact. While introducing modern features in the form of cable and cabins would result in new visual features to the historical resource's setting, the change would not constitute a significant impact.

Energy

Potential impacts to energy arising from Design Option A are associated with an extended construction schedule. Stadium Tower and Dodger Stadium are the only components of Design Option A that would result in impacts that differ from the proposed Project. Design Option A would add approximately 12 additional weeks of construction at the Stadium Tower for a total of 62 weeks of construction, as compared to 50 weeks of construction for the proposed Project. Design Option A would add an additional four weeks of construction at Dodger Stadium Station, for a total of 101 weeks of construction, as compared to 97 weeks of construction for the proposed Project. As such, the demand for electricity, fuel, and natural gas would increase during construction activities in comparison to the proposed Project. However, similar to the proposed Project, the demand for energy during construction would be temporary and any impact would be less than significant.

Geology/Soils

As with the proposed Project, Stadium Tower and Dodger Stadium Station under Design Option A would have the potential to impact geology and soils, including impacts related to earthquake-induced slope failure, lateral spreading, subsidence, liquefaction, collapse during grading and construction, expansive soils and soil corrosivity, differential settlement, other potential ground failures induced by the tower, and paleontological resources. However, similar to the proposed Project, Design Option A would be constructed in accordance with applicable standards, requirements, and building codes, which would ensure structural integrity and safe construction. Mitigation Measures **MM-GEO-A** (prepared a site-specific final geotechnical report) and **MM-GEO-B** (prepare a paleontological resource monitoring and mitigation plan (PRMMP)) would also be implemented, reducing potential to a level that is less than significant. Similar to the proposed Project, impacts with respect to geology and soils under Design Option A would be less than significant with mitigation.

Greenhouse Gas Emissions

Potential impacts to greenhouse gas emissions arising from Design Option A are associated with an extended construction schedule. Design Option A would result in an increase in the duration of construction due to the proposed utility relocation and increase in concrete work at the base of Stadium Tower (six-eight weeks additional time for utility relocation and four additional weeks for shoring wall and pilaster during the Foundations and Columns phase), as well as the increased excavation at Dodger Stadium Station (additional three weeks of shoring and excavation, followed by one week of additional concrete work for the retaining wall). As such, construction of Design Option A would increase GHG emissions. The additional construction under Design Option A would result in an increase in GHG emissions during construction; however, the increase would be minimal, as Design Option A would only add an additional 12 weeks of construction at Stadium Tower and an additional four weeks of construction at Dodger Stadium Station. As such, the additional construction duration for the Stadium Tower and Dodger Stadium Station under Design Option A would not contribute to a significant increase in GHG emissions because, as with the proposed Project, the net GHG emissions would still represent a reduction compared to existing conditions. Therefore, GHG emissions during construction under Design Option A would still remain less than existing conditions and be less than significant. While Design Option A would result in an increase in GHG emissions during construction as compared to the proposed Project, impacts would remain less than significant. Therefore, similar to the proposed Project, impacts with respect to GHG emissions under Design Option A would be less than significant.

Land Use and Planning

Design Option A would result in the removal of additional parking spaces for Dodger Stadium Station as compared to the proposed Project. Design Option A would permanently remove 337 parking spaces for the Dodger Stadium Station, due to the increased distance to Dodger Stadium requiring additional area for the proposed pedestrian connection to Dodger Stadium, as well as the retaining wall. Similar to the proposed Project, however, and consistent with the Dodger Stadium CUP, a total of 18,552 parking spaces would remain on site, exceeding the required parking spaces under the CUP. While additional parking spaces would be temporarily utilized at Dodger Stadium for Project construction, the number of parking spaces would at all times exceed the 15,556 total parking spaces that must be provided and maintained on site pursuant to the

CUP. Accordingly, Design Option A is consistent with the requirements of the Dodger Stadium CUP and similar to the proposed Project and with the implementation of Mitigation Measure **MM-LUP-A**, impacts for Design Option A with respect to land use would be less than significant with mitigation.

Utilities and Service Systems

Design Option A would require various utility relocations and encroachment into a City of Los Angeles water easement at Stadium Tower and the relocation of a 36-inch storm drain and a telecommunications line at Dodger Stadium Station. As with the proposed Project, the relocation of utilities may cause an impact related to the interruption of services for the surrounding areas. Mitigation Measure **MM-USS-A***, Development of a Utility Relocation Plan,* would be implemented. The Utility Relocation Plan would be developed to determine the existing utilities that would need to be relocated under Design Option A. Implementation of Mitigation Measure **MM-USS-A** would reduce potential impacts to utilities and service systems associated with Stadium Tower and Dodger Stadium Station construction under Design Option A to a level that is less than significant.

Finding

Because the environmental impacts for Design Option A are generally similar to those identified for the Project, Metro finds that the findings identified throughout this document are applicable to both the Project and to Design Option A. Metro finds that inclusion of the same mitigation measures identified for the Project would also avoid or substantially lessen the potentially significant environmental effects of Design Option A on the environment, with the exception of construction noise and vibration (human annoyance) (which would remain significant and unavoidable under Design Option A, even after mitigation).

3.2.2 Design Option B

In response to stakeholder feedback, the Project Sponsor assessed the potential to reduce the number of towers along Alameda Street from two to one. Design Option B removes Alpine Tower, located between the Alameda Station and the Chinatown/State Park Station, from the proposed Project and adds 50 feet to the Alameda Tower.

Project Components

Under Design Option B, the Project towers would be designed as monopoles and would support the required steel cables and mechanical equipment. The increased height of the Alameda Tower would coincide with an additional 30 drilled piles and an increased pile cap thickness from five feet to eight feet, as well as an additional 1,260 cubic yards (CY) of excavation and materials to be exported. Design Option B would result in an increased duration of construction in the Structural Steel/Tower Erection phase (approximately seven additional weeks), as well as an additional week of construction added to construct foundations and columns, for a total of eight additional weeks of construction activities.

Compared to the proposed Project, Design Option B would potentially result in additional technical considerations due to the increased angle of bend at the Alameda Tower compared to the

proposed Project. Additionally, Design Option B results in the need for additional private aerial rights requirements. The increased bend on the Alameda Tower would result in cables and gondola cabins being located in closer proximity to private property between Alameda Station and the Chinatown/State Park Station.

Impacts

As regards construction impacts, Design Option B does not materially differ in overall dimension, location, building material, or construction technique as compared to the proposed Project. Accordingly, Design Option B would have similar impacts to the proposed Project in the following CEQA impact areas: Agriculture and Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Energy; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Population and Housing; Public Services; Recreation; Tribal Cultural Resources; Utilities and Service Systems; and Wildfire. Any mitigation measures required for the Alameda Tower of the proposed Project would also be required for those of Design Option B. Under Design Option B, there is potential for variations in impacts to Aesthetics, Geology/Soils, and Transportation. While the increased height of the Alameda Tower would result in an increase in the duration of construction at Alameda Tower; with removal of Alpine Tower from the proposed Project, there would be an overall net decrease in construction impacts related to air quality, energy, and GHG under Design Option B. The CEQA impact areas that may differ from the proposed Project are discussed in detail in Section 6.3, Design Option B, of the Draft EIR and summarized below.

Aesthetics

Potential impacts to aesthetics arising from Design Option B are associated with the 50-foot overall height increase at the Alameda Tower. Compared to the proposed Project, the removal of the Alpine Tower would reduce visual impacts at Alameda and Alpine Streets during project construction and operation, as the tower would not be constructed. Therefore, visual impacts related to Alpine Tower would not occur under Design Option B and would be reduced compared to the less than significant impacts of the proposed Project. Analysis of the proposed height increase for Alameda Tower under Design Option B indicated that the height increase would not block any unique or scenic views. As with the proposed Project, due to the presence of the existing elevated Metro L (Gold) Line Chinatown/State Park Station, elevated light rail guideway, and overhead catenary system, Design Option B from this view would not introduce a visual feature that contrasts substantially with existing conditions. In addition, no unique or scenic views would be blocked.

Similar to the proposed Project, construction of Alameda Tower under Design Option B would represent a change in views compared to existing conditions. However, there are no designated scenic vistas or state- or county-designated scenic highways or eligible state scenic highways located in the Project area. Construction activities would be temporary and would not result in a substantial adverse effect on a scenic vista. As such, the proposed height increase at the Alameda Tower under Design Option B would not impact scenic vistas, or scenic resources within a state scenic highway. While the height increase would represent a visual change, it would not substantially diminish the broad scenic view or views of prominent visual features, and would not

conflict with applicable zoning or other regulations governing scenic quality. The increased height of the Alameda Tower would not introduce new sources or light and glare, and no impacts with respect to light and glare would occur due to the increased height.

The increased height of the Alameda Tower could result in additional shading; however, surrounding uses are not considered to be shade sensitive. As such, shadow impacts from Alameda Tower would be less than significant. Therefore, similar to the proposed Project, impacts with respect to aesthetics for the Alameda Tower under Design Option B would be less than significant.

Geology/Soils

During construction, grading and development that would occur from implementation of Design Option B could result in additional impacts to geology and soils due to the increase in the number of drilled piles, an increased pile cap thickness from five feet to eight feet, as well as additional excavation. Although on-site seismic conditions and potential hazards would not change relative to the proposed Project, the increase in construction activity compared to the proposed Project could result in an increase of potential impacts. Mitigation Measures **MM-GEO-A** (prepare a site-specific final geotechnical report) and **MM-GEO-B** (prepare a paleontological resource monitoring and mitigation plan (PRMMP)) would also be implemented. Implementation of Mitigation Measures **MM-GEO-A** and **MM-GEO-B** would reduce potential impacts associated with construction of the Alameda Tower to a level that is less than significant. Therefore, similar to the proposed Project, impacts with respect to geology and soils for the Alameda Tower under Design Option B would be less than significant with mitigation.

Transportation

Potential impacts to transportation arising from Design Option B are associated with an extended construction schedule. Construction of the Alameda Tower under Design Option B would increase the duration of construction. Due to the temporary nature of construction traffic associated with Design Option B (an additional eight weeks), a substantial increase in VMT would not be anticipated to result from construction. Similar to the proposed Project, Design Option B would implement Mitigation Measure **MM-TRA-A**, which would prohibit right turns on red from westbound Alhambra Avenue to northbound Alameda Street in order to alleviate potential visibility issues associated with operation of the Alameda Tower. Design Option B would also implement Mitigation Measure **MM-TRA-B**, which would require implementation of a Construction Traffic Management Plan to ensure adequate emergency access is maintained throughout all construction activities to reduce potential impacts during construction. Similar to the proposed Project, operation of Design Option B would provide additional transit and pedestrian connections, and would result in an overall reduction in VMT, resulting in a beneficial effect on the environment. Therefore, similar to the proposed Project, impacts with respect to transportation under Design Option B would be less than significant with mitigation.

Finding

Because the environmental impacts for Design Option B are generally similar to those identified for the Project, Metro finds that the findings identified throughout this document are applicable to both the Project and to Design Option B. Metro finds that inclusion of the same mitigation measures identified for the Project (with adjustments to Mitigation Measure MM-TRA-A as identified above) would also avoid or substantially lessen the potentially significant environmental effects of Design Option B on the environment, with the exception of construction noise and vibration (human annoyance) (which would remain significant and unavoidable under Design Option B, even after mitigation).

3.2.3 Design Option C

In response to stakeholder feedback, the Project Sponsor developed Design Option C, which consists of a 35-foot overall height increase at the Chinatown/State Park Station to allow cabins to enter and exit the station along Spring Street at a higher level.

Compared to the proposed Project, Design Option C has the potential to reduce passenger experience due to the height increase of the Chinatown/State Park Station under Design Option C, which also results in the boarding platform being raised, requiring additional vertical circulation to access and ascend the platform.

Project Components

The taller station would require drill piles that are 100 feet deep, which is 20 feet deeper than the drill piles for the proposed Project. In addition, the pile cap thickness would increase from six feet to eight feet, and the maximum depth of excavation would increase by two feet. This would result in an additional 717 CY increase in the amount of excavation and a 1,396 CY increase in the amount of materials exported. Due to these changes, construction would be extended by approximately eight weeks, which would extend the closure of the small portion of the State Park that would be closed during the construction period. All other construction and operational features remain the same as the proposed Project.

Impacts

Design Option C Project components do not materially differ in location, building material, or construction technique from the proposed Project. Therefore, Design Option C would have similar impacts to the proposed Project in the following CEQA impact areas: Agriculture and Forestry Resources; Biological Resources; Cultural Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Population and Housing; Public Services; Transportation; Tribal Cultural Resources; Utilities and Service Systems; and Wildfire. Any mitigation measures required for the respective proposed Project component would also be required for those of Design Option C. Under Design Option C, there is potential for variations in impacts to Aesthetics, Air Quality, Energy, Geology/Soils, Greenhouse Gas Emissions, and Recreation. The CEQA impact areas that may differ from the proposed Project are discussed in detail in Section 6.4, Design Option C, of the Draft EIR and summarized below.

Aesthetics

Potential impacts to aesthetics arising from Design Option C are associated with a 35-foot overall height increase at the Chinatown/State Park Station. The analysis indicates that the height of the new station under Design Option C appears slightly higher than the heights of other existing development in Chinatown and the height of the new station makes it more noticeable in the skyline compared to the proposed Project and existing development. In addition, the proposed cables and cabins would also be higher in this area due to the increased height of the Chinatown/State Park Station under Design Option C.

Construction activities would be temporary and would not result in a substantial adverse effect on a scenic vista. As such, the proposed height increase at the Chinatown/State Park Station under Design Option C would not impact scenic vistas, or scenic resources within a state scenic highway. While the height increase would represent a visual change, it would not substantially diminish the broad scenic view or views of prominent visual features, and would not conflict with applicable zoning or other regulations governing scenic quality. The increased height of the Chinatown/State Park Station under Design Option C would not introduce new sources or light and glare, and no impacts with respect to light and glare would occur due to the increased height.

However, the increased height of the Chinatown/State Park Station under Design Option C could result in additional shading. shadow impacts from the Chinatown/State Park Station under Design Option C would be less than significant. Therefore, similar to the proposed Project, impacts with respect to aesthetics for the Chinatown/State Park Station under Design Option C would be less than significant.

Air Quality

Potential impacts to air quality arising from Design Option C are associated with an extended construction schedule. Design Option C would add approximately eight additional weeks of construction at Chinatown/State Park Station for a total of 97 weeks of construction, as compared to the 89 weeks of construction for the proposed Project. As such, Design Option C would generate increased criteria pollutant emissions during construction compared to the proposed Project. Construction emissions of the proposed Project, as covered in Section 3.1, Air Quality, would be well below applicable South Coast Air Quality Management District (SCAQMD) mass daily significance thresholds and localized significant thresholds (LSTs) for all criteria pollutants. The additional construction under Design Option C would result in an increase in construction emissions; however, the increase would be minimal, as Design Option C would only add an additional eight weeks of construction at Chinatown/State Park Station. As such, the additional construction duration of Chinatown/State Park Station under Design Option C would not contribute to an increase in construction emissions to a level that would exceed SCAQMD mass daily significance thresholds and LSTs for all criteria pollutants, as the construction emissions calculated for the proposed Project are well below significance thresholds. Therefore, construction emissions under Design Option C would still remain below significance thresholds.

Energy

Potential impacts to energy arising from Design Option C are associated with an extended construction schedule. Design Option C would add approximately eight additional weeks of

construction at Chinatown/State Park Station for a total of 97 weeks of construction, as compared to the 89 weeks of construction for the proposed Project. As such, the demand for electricity, fuel, and natural gas would increase during construction activities in comparison to the proposed Project. However, similar to the proposed Project, the demand for energy during construction would be temporary, and in some cases, would supplant electricity otherwise provided by another energy source, such as diesel generators. Therefore, similar to the proposed Project, impacts with respect to energy resources for the Chinatown/State Park Station under Design Option C would be less than significant.

Geology and Soils

Design Option C includes drill piles that are 100 feet deep, 20-feet deeper than the drill piles for the proposed Project. Bedrock in the vicinity of the proposed Project alignment lies beneath the alluvium at a depth of approximately 25 to 50 feet below the ground surface. Design Option C would have a maximum drilled pile depth of 100 feet, which would be deeper than the Chinatown/State Park Station under the proposed Project; however, it would not exceed the deepest of the drilled pile depths analyzed across the Project alignment.

Like the proposed Project, Design Option C would have the potential to impact geology and soils, including impacts related to lateral spreading, subsidence, liquefaction, collapse during grading and construction, expansive soils and soil corrosivity, differential settlement, other potential ground failures induced by the station, and paleontological resources. Mitigation Measures **MM-GEO-A** (prepared a site-specific final geotechnical report) and **MM-GEO-B** (prepare a paleontological resource monitoring and mitigation plan (PRMMP)) would also be implemented and potential impacts associated with geology and soils would be reduced to a level that is less than significant. Similar to the proposed Project, impacts with respect to geology and soils for the Chinatown/State Park Station under Design Option C would be less than significant with mitigation.

Greenhouse Gas Emissions

Potential impacts to greenhouse gas emissions arising from Design Option C are associated with an extended construction schedule. Design Option C would result in an increase in the duration of construction due to increased excavation at Chinatown/State Park Station and would add approximately eight additional weeks of construction at Chinatown/State Park Station for a total of 97 weeks of construction, as compared to the 89 weeks of construction for the proposed Project. As such, construction of Design Option C would increase GHG emissions compared to the proposed Project. The additional construction under Design Option C would result in an increase in GHG emissions; however, the increase would be minimal, as Design Option C would only add an additional eight weeks of construction at Chinatown/State Park Station. As such, the additional construction duration at Chinatown/State Park Station under Design Option C would not contribute to an increase in GHG emissions to a level that would exceed existing conditions, as the net GHG emissions calculated for the proposed Project are well below significance thresholds. As such, GHG emissions during construction under Design Option C would still result in a decrease from existing conditions and below significance thresholds. Therefore, similar to the

proposed Project, impacts with respect to GHG emissions for the Chinatown/State Park Station under Design Option C would be less than significant.

Recreation

Potential impacts to recreation arising from Design Option C are associated with a temporary park closure during construction. The proposed Project would require the closure of approximately 1.59 acres of the southern entrance to Los Angeles State Historic Park during construction and the southernmost corner and western edge during cable installation. Design Option C would extend the duration of construction at this location by eight weeks, therefore resulting in a longer closure of this small portion of the park. However, as with the proposed Project, construction of the Chinatown/State Park Station under Design Option C would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment and would not result in adverse physical impacts associated with physically altering a government facility (i.e., parks). Therefore, similar to the proposed Project, impacts with respect to parks and recreational facilities for the Chinatown/State Park Station under Design Option C would be less than significant.

Finding

Because the environmental impacts for Design Option C are generally similar to those identified for the Project, Metro finds that the findings identified throughout this document are applicable to both the Project and to Design Option C. Metro finds that inclusion of the same mitigation measures identified for the Project would also avoid or substantially lessen the potentially significant environmental effects of Design Option C on the environment, with the exception of construction noise and vibration (human annoyance) (which would remain significant and unavoidable under Design Option C, even after mitigation).

3.2.4 Use Option D

In response to stakeholder feedback, the Project Sponsor developed Use Option D, which includes substituting a non-passenger junction for the Chinatown/State Park Station. No other project changes are proposed under Use Option D, and all other construction and operational features would be the same, or similar to, the proposed Project. Use Option D would have the same location, height, width, length, and architectural finish as the proposed Project.

Several comments on the Notice of Preparation requested an intermediate station closer to Chinatown to be located at the current Metro L (Gold) Line station to bring business into the commercial area and to offer another travel mode choice so as to alleviate parking problems in the area. It is also anticipated that approximately 15 percent of passengers would access the Chinatown/State Park Station under the proposed Project on game days or during events at the Los Angeles State Historic Park. However, under Use Option D, no station access would be provided to the core of Chinatown, the Mission Junction neighborhood, or the Los Angeles State Historic Park. Further, the Chinatown/State Park Station as a non-passenger junction under Use Option D would not enhance transit access to surrounding communities, including the Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and

North Broadway. As such, if the Chinatown/State Park Station were to operate as a non-passenger junction under Use Option D, it would not provide transit benefits to the public.

Components

Use Option D would have the same location, height, width, length, and architectural finish as the proposed Project. As Use Option D would substitute Chinatown/State Park Station with a junction, certain passenger features would not be included. Use Option D would not include a mezzanine for passengers and would not include vertical circulation elements for passengers. Stairs and other elements required for the service and maintenance of the junction would remain the same as the proposed Project. All other construction and operational features remain the same as the proposed Project.

Impacts

The Use Option D Project component does not materially differ in location, building material, construction duration, or construction technique. Use Option D would have less than or similar impacts to the proposed Project in the following CEQA impact areas: Aesthetics; Agriculture and Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Mineral Resources; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; Utilities and Service Systems; and Wildfire. Any mitigation measures required for the respective proposed Project component would also be required for those of Use Option D. Under Design Option D, there is potential for impacts to Land Use and Planning and Noise. The CEQA impact areas that may differ from the proposed Project are discussed in detail in Section 6.5, Design Option D, of the Draft EIR and summarized below.

Land Use and Planning

Potential impacts to land use and planning arising from Design Option D are associated with a lack of passenger access to the ART system. As there would be no passenger access Design Option D would not meet a majority of the Project's objectives associated with the Chinatown/State Park Station. For example, Use Option D would not provide transit access to the Los Angeles State Historic Park and to nearby neighborhoods and land uses, including Chinatown, Solano Canyon, and the Mission Junction neighborhood. In addition, Use Option D would not provide expanded transit access to parks, including the Los Angeles State Historic Park and the Los Angeles River. Use Option D would also not provide comparable, affordable, and accessible fare opportunities for the community. Use Option D would not provide the same consistency with the Los Angeles State Historic Park General Plan as the proposed Project. While this Use Option would be less consistent, similar to the proposed Project, impacts with respect to Land Use and Planning under Use Option D would be less than significant with implementation of Mitigation Measure **MM-LUP-A**.

Noise

Construction of Use Option D would generate the same type and volume of construction noise as the proposed Project, and the noise generated would affect the same sensitive receptors.

Mitigation Measure **MM-NOI-A** would continue to be required for Use Option D to reduce construction noise impacts from stationary equipment, and to reduce impacts to the local community related to disturbances from construction noise. Operational noise associated with the proposed junction, cabins, and mechanical equipment would remain under Use Option D. However, compared to the proposed Project, Use Option D would generate fewer noise impacts during operation than the proposed Project, as Use Option D would not include passenger access. As such, operational noise impacts would be reduced under Use Option D when compared to the proposed Project. Therefore, similar to the proposed Project, impacts with respect to operation noise under Use Option D would be less than significant.

Finding

Because the environmental impacts for Use Option D are generally similar to those identified for the Project, Metro finds that the findings identified throughout this document are applicable to both the Project and to Use Option D. Metro finds that inclusion of the same mitigation measures identified for the Project would also avoid or substantially lessen the potentially significant environmental effects of Use Option D on the environment, with the exception of construction noise and vibration (human annoyance) (which would remain significant and unavoidable under Use Option D, even after mitigation).

3.2.5 Design and Use Option E

The Los Angeles State Historic Park proposed an Americans with Disabilities Act (ADA) compliant pedestrian bridge that would gently slope from the central portion of the Los Angeles State Historic Park, an area known as the overlook, over the Metro L (Gold) Line, and up to North Broadway. While the pedestrian bridge is not included as part of the proposed Project, the Draft EIR includes an analysis of the pedestrian bridge for the Los Angeles State Historic Park and the proposed pedestrian bridge remains a standalone Design and Use Option.

The entrance to the pedestrian bridge would be located on the south side of Broadway, east of the intersection of North Broadway and Bishops Road. This connection would provide pedestrian access to neighborhoods and land uses north of Broadway, including this portion of Chinatown, Cathedral High School, the Savoy neighborhood, Elysian Park, and the Solano Canyon neighborhood.

Components

It is estimated that the construction of the pedestrian bridge would require approximately 60 weeks of construction, and could be constructed simultaneously with other Project components. Approximately 700 CY of excavation and 400 CY of material to be exported. Design and Use Option E would include approximately 40 two- to three-foot diameter by 70-feet deep piles. The pedestrian bridge would require the closure of approximately 100,000 sq. ft. (2.3 acres) of the park for construction. In addition, during construction, sidewalk closures would be required along North Broadway for asphalt and re-striping. A new curb extension would also be introduced along the southern edge of North Broadway and parallel parking spaces would also be removed along the roadway.

Impacts

Because of the nature of Design and Use Option E, the Draft EIR evaluated it for potential impacts to all CEQA impact categories. A more detailed analysis of potential impacts associated with Design and Use Option E is provided in Section 6.6, Design and Use Option E, of the Draft EIR and summarized below.

Aesthetics

The pedestrian bridge would represent a change in views compared to existing conditions. Construction activities would require equipment such as construction barriers and soundwalls, cranes, and other appurtenances that would be visible during much of the construction period. Regardless, there are no designated scenic vistas present or state- or county-designated scenic highways or eligible state scenic highways located in the Project area. As such, Design and Use Option E would not impact scenic vistas, or scenic resources within a state scenic highway.

Design and Use Option E would be consistent with Los Angeles State Historic Park General Plan, as the design of the pedestrian bridge would be consistent with the overall design guidelines and with the Park's vision and educational, recreational, and environmental objectives. As such, Design and Use Option E would not conflict with applicable zoning or other regulations governing scenic quality. Design and Use Option E would not introduce new sources of light or glare, and no impacts with respect to light and glare would occur due the design aesthetic and build materials of the pedestrian bridge. Design and Use Option E would result in creating new shadows. However, the relatively small areas of park walkways and green spaces that would receive shading from the pedestrian bridge would be similar in nature to those from the existing elevated walkway in this area known as the overlook. Accordingly, impacts to aesthetics would be less than significant.

Agriculture and Forestry Resources

As with the proposed Project, Design and Use Option E would not conflict with or cause rezoning of forest land or timberland, result in the loss or conversion of forest land, or result in the conversion of Farmland or forest land to non-agricultural or non-forest uses, as the proposed location of the pedestrian bridge under Design and Use Option E is not in land zoned as agricultural or forest land. Therefore, similar to the proposed Project, impacts with respect to agriculture and forestry resources for the proposed pedestrian bridge under Design and Use Option E would be less than significant.

Air Quality

Design and Use Option E would result in construction of an additional Project component in comparison to the proposed Project. The proposed pedestrian bridge under Design and Use Option E would take approximately 60 weeks (15 months) to construct, and could be constructed simultaneously with other Project components. While the proposed pedestrian bridge under Design and Use Option E would increase construction activities on the Project site, daily construction activities would be similar to those under the proposed Project. The construction emissions from the proposed Project would be well below applicable South Coast Air Quality

Management District (SCAQMD) mass daily significance thresholds and localized significant thresholds (LSTs) for all criteria pollutants. The additional construction footprint and construction equipment under Design and Use Option E would result in an increase in construction emissions. However, the additional construction of the proposed pedestrian bridge under Design and Use Option E would not contribute an increase in construction emissions to a level that would exceed SCAQMD mass daily significance thresholds and LSTs for all criteria pollutants, as the construction emissions calculated for the proposed Project are well below significance thresholds. Construction emissions under Design and Use Option E would also remain below significance thresholds. Operational impacts would remain the same as the proposed Project. Therefore, similar to the proposed Project, impacts with respect to air quality for the proposed pedestrian bridge under Design and Use Option E would be less than significant.

Biological Resources

Design and Use Option E would result in additional construction and disturbance in Los Angeles State Historic Park. The Los Angeles State Historic Park contains ornamental shrubs, herbaceous vegetation, and various trees, which may need to be removed as part of Design and Use Option E. The section of the Park where the proposed pedestrian bridge would be constructed was not included in the tree inventory report prepared for the proposed Project. This section of the Park is mainly comprised of lawn, paved and stone walking paths, and ornamental landscaping of trees and shrubs. Similar to the proposed Project, any trees removed during construction would be required to be replaced in accordance with the City's Native Tree Protection Ordinance and the City's Street Tree Policy. Additionally, the removal of trees located on State Park property would require special permit approval of the California Department of Parks and Recreation. No active raptor nests or songbird nests were detected during surveys, and no natural plant communities exist within the area. However, there is potentially suitable tree roosting habitat within the vicinity of the proposed pedestrian bridge. Similar to the proposed Project, Design and Use Option E would implement Mitigation Measures **MM-BIO-A** and **MM-BIO-B**. Therefore, similar to the proposed Project, impacts with respect to biological resources for the proposed pedestrian bridge under Design and Use Option E would be less than significant with mitigation.

Cultural Resources

Construction of the proposed pedestrian bridge under Design and Use Option E would not impact designated and non-designated eligible historical resources either through direct physical effects or through indirect affects to the area surrounding a resource, as the proposed pedestrian bridge would not be located in the proximity of any historical resources. However, Design and Use Option E would result in additional construction and disturbance in Los Angeles State Historic Park. Grading and development would have the potential to result in additional impacts to cultural resources due to excavation for the proposed pedestrian bridge. Construction-related ground disturbing activities associated with Design and Use Option E could lead to the discovery of previously unknown archaeological resources and human remains. The proposed pedestrian bridge (including the staging area) would be located within Los Angeles State Historic Park, which is considered an archaeological site due to the presence of sub-surface remnants from over 100 years of use as a railroad facility. As such, impacts related to construction of Design and Use Option E could be potentially significant if an unknown archaeological resource is identified during

construction. Similar to the proposed Project, to mitigate the impacts of an inadvertent discovery of the resources known to exist in the resource boundary, Mitigation Measure **MM-CUL-E** would be required. In addition, Mitigation Measures **MM-CUL-A** and **MM-CUL-B** would also be implemented in order to reduce any potential impacts to archaeological resources and human remains. Further, compliance with existing regulations, including California Health and Safety Code section 7050.5 and Public Resources Code section 5097.98, would also protect human remains. Therefore, similar to the proposed Project, impacts with respect to cultural resources for the proposed pedestrian bridge under Design and Use Option E would be less than significant with mitigation.

Energy

Design and Use Option E would result in construction of an additional Project component. As such, the demand for electricity, fuel, and natural gas would increase to construct this Project component. Similar to the proposed Project, the demand for energy during construction would be temporary, and in some cases would supplant electricity otherwise provided by another energy source, such as diesel generators. Construction activities would also comply with state requirements designed to minimize idling and associated emissions, which also minimizes the use of fuel. In addition, while Design and Use Option E would result in a minimal increase in natural gas use during construction when compared to the proposed Project, this would be considered negligible when evaluated on a local and regional scale and would not adversely impact local or regional energy supplies or not require additional capacity. Overall, the temporary energy consumption associated with construction would allow for a long-term reduction in energy consumption associated with operations of the proposed Project. Design and Use Option E would not result in operational impacts. Therefore, similar to the proposed Project, impacts with respect to energy resources for the proposed pedestrian bridge under Design and Use Option E would be less than significant.

Geology and Soils

Grading and development that would occur from implementation of Design and Use Option E would result in additional impacts to geology and soils due to additional excavation for the proposed pedestrian bridge. Although on-site seismic conditions and potential hazards would not change relative to the existing conditions, the increase in people and structures that could be subject to such risks would increase due to the addition of the pedestrian bridge, thereby increasing potential impacts.

Under Design and Use Option E, Mitigation Measure **MM-GEO-A**, would still be required. Furthermore, Design and Use Option E would comply with existing laws and regulations, which would be ensured through the City's permitting process. Therefore, similar to the proposed Project, impacts with respect to geology and soils for the proposed pedestrian bridge under Design and Use Option E would be less than significant with mitigation.

Greenhouse Gas Emissions

Design and Use Option E would result in construction of an additional Project component. As such, construction of Design and Use Option E would increase GHG emissions. However, the

proposed Project would result in an overall decrease from existing conditions by 6,375 MT CO2e/yr. The additional construction activities would be minimal, as Design and Use Option E only includes construction of a pedestrian bridge, and would not utilize heavy construction equipment that would generate a significant increase in GHG emissions compared to the proposed Project. The additional construction duration for the proposed pedestrian bridge under Design and Use Option E would not contribute to an increase in GHG emissions to a level that would exceed existing conditions, as the net GHG emissions calculated for the proposed Project are well below significance thresholds. As such, GHG emissions during construction under Design and Use Option E would still result in a decrease from existing conditions and below significance thresholds. In addition, Design and Use Option E would provide additional pedestrian connectivity that would be consistent with local, regional, and statewide policies to reduce traffic, air pollution, and GHGs by reducing VMT. Further, Design and Use Option E would remain consistent with all applicable GHG reduction plans, policies, and regulations. Therefore, similar to the proposed Project, impacts with respect to GHG emissions for the proposed pedestrian bridge under Design and Use Option E would be less than significant.

Hazards and Hazardous Materials

The Los Angeles State Historic Park property is listed in multiple hazardous materials database listings as the site was formerly used as the Southern Pacific (now Union Pacific) Company's freight yards, which included transfer station and storage yard activities. The site is subject to soil removal action under DTSC and groundwater monitoring at the request of the Regional Water Quality Control Board. Concentrations of benzene and ethylbenzene were detected above their respective California maximum contaminant levels in well BMW-4, which is located upgradient of the proposed pedestrian bridge location. Although not anticipated, residual contamination may be encountered during excavation and construction activities. Under Design and Use Option E, Mitigation Measure **MM-HAZ-A**, which requires preparation of a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities, would be required. Implementation of Mitigation Measure **MM-HAZ-A** will specify methods for handling and disposal in the event contaminated groundwater is encountered during construction of Design and Use Option E. Therefore, similar to the proposed Project, impacts with respect to hazards and hazardous materials for the proposed pedestrian bridge under Design and Use Option E would be less than significant with mitigation.

Hydrology and Water Quality

Groundwater levels range from 27 to 35 feet below ground surface in the vicinity of the Los Angeles State Historic Park. It is estimated that the foundations for Design and Use Option E would be located at a depth of approximately 10 feet, with piles drilled to approximately 70 feet. Based on these anticipated depths to groundwater, it is considered unlikely groundwater will be encountered during construction of Design and Use Option E, however, removal of nuisance water that seeps into boreholes during construction may be required for the pile installations. In addition, uncontrolled erosion and discharge of sediments and other potential pollutants during construction could result in adverse effects to water quality, violating water quality standards and waste discharge requirements. As with the proposed Project, Design and Use Option E would be required to comply with all applicable water quality protection laws and regulations, as well as

commonly utilized industry standards. In addition, as with the proposed Project, Design and Use Option E would comply with the Construction General Permit in effect at the time of construction. Additionally, Design and Use Option E would be incorporated into the construction Stormwater Pollution Prevention Plan (SWPPP) which would be required as part of the proposed Project.

Design and Use Option E would increase the amount of impervious surface at the site. The proposed Project would create 27,861 square feet of new impervious surface. Design and Use Option E would create an additional 6,617 square feet of impervious surface. However, the actual footprint of Design and Use Option E at the ground level would be less than the total amount of existing impervious surface area. The footprint of Design and Use Option E is nominal when compared to the area of the groundwater basin.

Since Design and Use Option E is located immediately adjacent to the proposed Project, the analysis of flood hazards, tsunamis, or seiche zones completed for the proposed Project is applicable to the pedestrian bridge.

With adherence to applicable federal state, regional, and local laws and regulations, including compliance with applicable stormwater permits, wastewater permits, and other water quality regulations, construction and operation of Design and Use Option E would result in less than significant impacts to hydrology and water quality.

Land Use and Planning

Similar to the proposed Project, construction of the Los Angeles State Historic Park pedestrian bridge would be consistent with the Los Angeles State Historic Park General Plan. Although the pedestrian bridge would be consistent with the Los Angeles State Historic Park General Plan, State Parks has determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. Mitigation Measure **MM-LUP-A** would be implemented to require the proposed Project to obtain a LASHP General Plan Amendment, which would reduce this impact to less than significant.

Similar to construction of the Broadway Junction component of the proposed Project, construction of Design and Use Option E would require both partial and full closures of North Broadway during construction. Although established communities would not be physically divided during construction, these closures would temporarily disrupt vehicular, bicycle, and pedestrian access to through traffic and cross streets at these locations. The closures would be temporary and would only occur during the construction phase. Additionally, as available, closures would only occur during construction hours and some travel lanes would be restored during non-construction hours. Though these temporary closures during construction would disrupt vehicular, pedestrian, and bicycle access within and between communities, there would be a variety of options available for connections and access within the Project area. The provision of pedestrian detours during certain phases of construction would allow for continued pedestrian access within the Project area. These communities will remain accessible from other surrounding streets and these closures would not

physically divide these communities. Therefore, similar to the proposed Project, impacts with respect to land use and planning for the proposed pedestrian bridge under Design and Use Option E would be less than significant.

Mineral Resources

The additional grading and development that would occur from implementation of Design and Use Option E would have the potential to uncover mineral resources due to additional excavation for the proposed pedestrian bridge. However, similar to the proposed Project, the proposed pedestrian bridge under Design and Use Option E would also be located within an area designated as MRZ-3, which includes areas containing mineral deposits, the significance of which cannot be evaluated from available data. As such, the proposed pedestrian bridge under Design and Use Option E would not result in a loss of availability of known mineral resources; result in the extraction of these resources; or further preclude the extraction of such resources. Therefore, similar to the proposed Project, impacts with respect to mineral resources for the proposed pedestrian bridge under Design and Use Option E would not occur.

Noise

Design and Use Option E would result in construction of an additional Project component in comparison to the proposed Project. As such, construction noise would increase in the area of the proposed pedestrian bridge within Los Angeles State Historic Park. Construction of the proposed pedestrian bridge would generate the same type and volume of construction noise as the proposed Project, and the noise generated would affect the same sensitive receptors in the vicinity of the Los Angeles State Historic Park and Broadway Junction. Mitigation Measure **MM-NOI-A** would be required to reduce construction noise impacts from stationary equipment, and to reduce impacts to the local community related to disturbances from construction noise. Similar to the proposed Project, impacts with respect to noise under Design and Use Option E would be significant and unavoidable, even with mitigation.

The proposed pedestrian bridge would not generate noise impacts during operation except for those similar to existing Park users such as pedestrian and bicyclists. Therefore, similar to the Project, impacts with respect to operational noise under Design and Use Option E would be less than significant.

Population and Housing

Design and Use Option E does not introduce new housing units. As such, it would not result in a direct population increase from construction of new homes. Additionally, construction workers needed during any construction phase would likely come from the labor force within the region and no substantial influx of new workers would be needed. Therefore, construction employment generated by Design and Use Option E would not impact population. Similarly, workers needed for the operation and maintenance of the pedestrian bridge would likely come from the labor force within the region and no substantial influx of new workers would be needed. As such, operation employment generated by Design and Use Option E would not impact populate in the heavily populated Los Angeles region. Therefore, similar to the Project, impacts with respect to population and housing under Design and Use Option E would be less than significant.

Recreation

The proposed Project would require the closure of approximately 1.59 acres of the southern entrance to Los Angeles State Historic Park and the southernmost corner and western edge during cable installation. Design and Use Option E would require the closure of approximately 2.3 acres of the Park, in an area known as the overlook, which would be temporarily fenced off for approximately 60 weeks for construction of the pedestrian bridge. As such, Design and Use Option E would add additional construction within the park and would result in closures to additional areas of the park, which has the potential to discourage patrons from using the park, disrupt events occurring at the park, or increase the use of the open portions of the park. However, similar to the proposed Project, patrons would still be able to access approximately 28 acres of the 32-acre Los Angeles State Historic Park during construction activities within the park, and it is not anticipated that construction activities in one area of the park would increase the use in other areas of the park such that substantial physical deterioration of the facility could occur.

Design and Use Option E would be consistent with Guidelines Access 3 and Access 4 of the Los Angeles State Historic Park General Plan. Therefore, similar to the proposed Project, impacts with respect to parks and recreational facilities for the proposed pedestrian bridge under Design and Use Option E would be less than significant.

Public Services

Construction of Design and Use Option E would result in similar temporary lane closures as the proposed Project. Emergency response times to both Police and Fire services could be impacted. However, a Construction Traffic Management Plan, as outlined in Mitigation Measure **MM-TRA-B** would also be required to ensure adequate emergency access is maintained in and around the Project alignment and component sites throughout all construction activities.

There are four schools located within the Project Study Area. Construction of Design and Use Option E could result in temporary impacts related to dust, noise, and lane closures, that may indirectly impact Cathedral High School. However, given the temporary impacts associated with construction of the pedestrian bridge, Design and Use Option E would not require the provision of new or physical altered governmental facilities in order to maintain acceptable performance objectives for schools. It is not anticipated that the other three schools within the Project Study Area would be substantially impacted by construction of Design and Use Option E due to the distance of the schools from the pedestrian bridge.

Regarding other public facilities, while temporary lane closures during construction would increase traffic volumes on detour routes, which could increase traffic congestion on those routes, Design and Use Option E, like the Project alignment, is located in an established urban area that is well-served by the surrounding roadway network. Mitigation Measure **MM-TRA-B** would be required to ensure adequate emergency access is maintained in and around the Project alignment and component sites throughout all construction activities. In addition, it is not anticipated that construction of Design and Use Option E would result in an increase in demand for libraries, senior centers, homeless bridge housing facilities, or childcare services.

Therefore, similar to the Project, impacts with respect to public services under Design and Use Option E would be less than significant with mitigation.

Transportation

As with the proposed Project, the pedestrian bridge under Design and Use Option E would support multimodal transportation options and a reduction in VMT. Construction of the pedestrian bridge under Design and Use Option E would result in construction of an additional Project component in comparison to the proposed Project. However, due to the temporary nature of construction traffic associated with Design and Use Option E, which could be constructed simultaneously with other Project components, a substantial increase in VMT would not be anticipated to result from construction. In addition, similar to the proposed Project, Design and Use Option E would provide additional pedestrian connections, and would result in an overall reduction in VMT, resulting in a beneficial effect on the environment. Construction of Design and Use Option E would require partial and full lane and sidewalk closures on North Broadway near its intersection with Bishops Road. As with the proposed Project, construction worksites would be fenced, and lane closures and associated lane tapers, temporary advance warning signs, detour signs, etc., would be implemented. Design and Use Option E would also implement Mitigation Measure **MM-TRA-B**. Therefore, similar to the proposed Project, impacts with respect to transportation under Design and Use Option E would be less than significant with mitigation.

Tribal Cultural Resources

Tribal Cultural Resources, archival research for the Area of Direct Impacts resulted in the identification of one multi-component (prehistoric and historic) site, Resource 19-001575. However, this resource is located near the Los Angeles Union Station and not near the pedestrian bridge under Design and Use Option E. No other tribal cultural resources with significance to a California Native American tribe have been identified through archival research or AB 52 consultation. However, ground disturbing activities have the potential to reveal additional unidentified subsurface deposits of prehistoric and historic-age, and Native American burials. Mitigation Measure **MM-TCR-A** would require a Native American monitor to be present during ground disturbing activities and would include procedures in the event of unanticipated discovery. With implementation of Mitigation Measure **MM-TCR-A**, impacts would be less than significant.

Utilities and Service Systems

Existing utilities in the area of the pedestrian bridge under Design and Use Option E consist of irrigation valves and lines and low voltage electrical pull boxes. Therefore, minimal utility relocation may be required for the construction of Design and Use Option E. Construction of Design and Use Option E would have sufficient water supply. The existing water supply sources are adequate to meet the demands for LADWP's service area and construction of Design and Use Option E would not increase water usage that would exceed the current supply. Little to no water would be needed for operation of Design and Use Option E. Construction activities associated with Design and Use Option E would not result in substantial discharges of wastewater to the City's sewer collection system. Although construction activities would generate potential sources of wastewater such as nuisance water that may seep into boreholes during construction, the water removed from the boreholes would be containerized and analyzed consistent with

existing applicable regulations to determine the proper disposal method. Adherence to existing regulations would require treatment of water prior to discharge. Little to no wastewater would be generated for operation of Design and Use Option E. Design and Use Option E, in combination with the proposed Project, would generate less than one percent of the capacity of the landfill; as such, the Sunshine Canyon Landfill would adequately accommodate the anticipated amount of solid waste generated for the Design and Use Option E. Solid waste would not be generated in excess of state or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Design and Use Option E would comply with federal, state, and local reduction strategies and regulations related to solid waste. Little to no solid waste would be generated for operation of Design and Use Option E. Therefore, impacts with respect to utilities and service systems under Design and Use Option E would be less than significant.

Wildfire

Unlike the proposed Project, which includes components located in an identified Very High Fire Hazard Severity Zone, Design and Use Option E would not be constructed in a Very High Fire Hazard Severity Zone. Although Design and Use Option E would be constructed within the Los Angeles State Historic Park, the vegetation in the park is landscaped and maintained and would not provide fuel for wildfires. Construction activities associated with Design and Use Option E would not exacerbate wildfire, expose people to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, require the installation or maintenance of infrastructure that may exacerbate fire risk, or expose people or structures to risks as a result of runoff, post-fire slope instability, or drainage changes beyond existing conditions.

Under Design and Use Option E, construction of the pedestrian bridge would require lane closures on North Broadway. Fire lanes provided during the construction phase of Design and Use Option E would be designated and designed for fire and emergency team access pursuant to Section 503 of the Los Angeles Fire Code.

Therefore, similar to the proposed Project, impacts with respect to wildfire under Design and Use Option E would be less than significant.

Finding

Because the environmental impacts for Design and Use Option E are generally similar to those identified for the Project, Metro finds that the findings identified throughout this document are applicable to both the Project and to Design and Use Option E. Metro finds that inclusion of the same mitigation measures identified for the Project would also avoid or substantially lessen the potentially significant environmental effects of Design and Use Option E on the environment, with the exception of construction noise and vibration (human annoyance) (which would remain significant and unavoidable under Design and Use Option E, even after mitigation).

3.3 PROJECT PURPOSE AND OBJECTIVES

The overall purpose of the Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS. ART is a proven, zero emission, safe, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed in Section 2.3.8, Project Objectives, of the Draft EIR, the Project objectives are as follows:

- Expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium, a regional event center.
- Attract new transit riders to the Metro system through a unique experience of an aerial transit system connecting to Dodger Stadium.
- Improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium.
- Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area.
- Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.
- Increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property.
- Improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans.
- Bring a world class aerial transit system to the Los Angeles area.
- Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.
- Identify comparable, affordable, and accessible fare opportunities for community and Los Angeles State Historic Park and Elysian Park access.
- Minimize the Project's environmental footprint through the integration of sustainability and environmentally friendly design features into the materials, construction, operations, and maintenance of the Project.

- Provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality.

- Maximize the Project's alignment along the public ROW and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses.

4. STATUTORY REQUIREMENTS

CEQA (Pub. Resources Code § 21081) and the CEQA Guidelines (14 Cal. Code Regs. § 15091) provide certain findings that the public agency must make before approving or carrying out a project. Specifically, CEQA Guidelines section 15091 requires that (bracketed language added):

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the Project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. ["CEQA Finding 1"]

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. ["CEQA Finding 2"]

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. ["CEQA Finding 3"]

(b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to avoid or mitigate significant environmental impacts that would otherwise occur with implementation of the Project.

For those significant impacts that cannot be mitigated to less than significant levels, the lead agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the Project outweigh the significant impacts on the environment. CEQA Guidelines section 15093(a) states that, "If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed Project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" If the adverse environmental effects are considered acceptable the lead agency is required to prepare a Statement of Overriding Considerations.

4.1 RECORD OF PROCEEDINGS

For purposes of CEQA and the findings set forth herein, the record of proceedings for Metro's decision on the Project consists of: (a) matters of common knowledge to Metro, including, but not limited to, federal, State, and local laws and regulations; and (b) the following documents which are in the custody of Metro, One Gateway Plaza, Records Management, MS 99-PL-5, Los Angeles, CA 90012:

- Notice of Preparation and other public notices issued by Metro in conjunction with the Project;
- The Draft EIR dated October 2022, including all associated appendices and documents that were incorporated by reference;
- All testimony, documentary evidence, and all correspondence submitted in response to the Project during the scoping meetings or by agencies or members of the public during the public comment period on the Draft EIR, and responses to those comments (Section 6.0, Responses to Comments, of the Final EIR);
- The Final EIR dated December 2023 including all associated appendices and documents that were incorporated by reference;
- The MMRP (Section 7.0 of the Final EIR);
- Errata;
- All findings and resolutions adopted by Metro in connection with the Project, and all documents cited or referred to therein;

- All final technical reports and addenda, studies, memoranda, maps, correspondence, and all planning documents prepared by Metro or the consultants relating to the Project;
- All documents submitted to Metro by agencies or members of the public in connection with development of the Project;
- All actions of Metro with respect to the Project; and
- Any other materials required by Public Resources Code section 21167.6(e) to be in the record of proceedings.

5. ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

5.1 NOISE

As discussed in Section 3.13, Noise, of the Draft EIR, the Project would have significant impacts related to noise with respect to the following significance thresholds:

- Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Threshold. *Increased Ambient Noise Levels* (Construction): As discussed in Section 3.13.5.1, Construction Noise, of the Draft EIR, temporary noise impacts from on-site Project construction would be significant and unavoidable. Noise impacts from Project construction activities would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Each phase of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. Construction noise levels would fluctuate throughout a given workday as construction equipment moves within the various Project component construction sites.

A construction noise impact analysis was conducted for each Project component during selected worst-case construction phases, evaluating all noise sensitive receptors (NSRs) within approximately 500 feet of each Project component site. Metro applies the Federal Transit Administration (FTA) impact assessment criteria for both noise and vibration. The City of Los Angeles utilizes thresholds from the City's 2006 L.A. CEQA Thresholds Guide and the LAMC for noise, which are generally not utilized by Metro, but were included for purposes of the Draft EIR's analysis. Construction activities at Dodger Stadium Station and the Mesa Laydown lot would not result in on-site construction noise impacts to sensitive receptors under the L.A. CEQA Thresholds Guide or FTA Manual thresholds, but would result in a significant impact under the

LAMC threshold which sets a maximum noise level for construction equipment of 75 dBA at 50 feet.

Mitigation Measure **MM-NOI-A** would reduce construction noise impacts through the use of noise barriers, maintenance of equipment, avoidance of unnecessary equipment idling, the use of electrical equipment where practicable, and locating equipment as far from noise-sensitive receptors to the extent feasible. Noise barriers were designed and placed in collaboration with the construction contractor based on the location of noise producing equipment in relation to the sensitive receptors, as well as the physical constraints of the Project site and the Project phase. These barriers would reduce noise levels to the extent that construction activities are shielded (i.e., below the height of sound barriers) or not within line-of-sight of noise-sensitive receptors (e.g., upper stories of residential buildings). However, because construction of stations and towers at different phases will occur at elevations above the tops of sound barriers or in some cases within line-of-sight of noise-sensitive receptors, even with implementation of these measures, significant impacts from noise levels due to construction activities would remain. For the LAMC analysis, with implementation of Mitigation Measure **MM-NOI-A**, construction equipment would generate noise greater than 75 dBA at a distance of 50 feet, resulting in a significant and unavoidable impact for all construction phases. The noise levels generated at specific sensitive receptors by construction phase with mitigation are provided in Table 3.13-17 of the Draft EIR. In addition, for the L.A. CEQA Thresholds Guide analysis and the FTA Manual analysis, the significant impacts would remain at the following locations:

- *Alameda Station*

L.A. CEQA Thresholds Guide

With implementation of Mitigation Measure **MM-NOI-A**, the construction noise impact at NSR 1B (First 5 LA) would be reduced to less than significant. Implementation of Mitigation Measure NOI-A would be required to minimize the impact at NSR 1A (Los Angeles Union Station), NSR 2 (El Pueblo) and NSR 3 (Mozaic Apartments); however, the construction impact at these receptors would remain significant and unavoidable during all construction phases.

FTA Manual

With the implementation of Mitigation Measure **MM-NOI-A**, the construction noise impact during the Foundations and Columns phase at NSR 3 (Mozaic Apartments) would be reduced to less than significant. Implementation of Mitigation Measure NOI-A would be required to minimize the impact at NSR 2 (El Pueblo) and NSR 3 (Mozaic Apartments) during the Structural Steel and Gondola Equipment Erection and the Vertical Circulation, Hardscape, Landscape, and Interior Work phases, as well as the Foundations and Columns phase for NSR 2; however, the construction impact at NSR 2 and NSR 3 would remain significant and unavoidable during these construction phases.

- *Alameda Tower*

L.A. CEQA Thresholds Guide

Implementation of Mitigation Measure **MM-NOI-A** would be required to minimize the impact at NSR 4 (The California Endowment); however, the construction impact at NSR 4 would remain significant and unavoidable during all construction phases.

- *Alpine Tower*

L.A. CEQA Thresholds Guide

With the implementation of Mitigation Measure **MM-NOI-A**, the construction noise impact during the Vertical Circulation, Hardscape, Landscape, and Interior Work phase at NSR 6 (Chinatown Senior Lofts) and NSR 7 (Homeboy Industries) would be reduced to less than significant. Implementation of Mitigation Measure NOI-A would be required to minimize impacts at NSR 5 (Future Residential Development), NSR 6 (Chinatown Senior Lofts), and NSR 7 (Homeboy Industries) during the Foundations and Columns and Structural Steel and Gondola Equipment Erection phases, and the Vertical Circulation, Hardscape, Landscape, and Interior Work phase at NSR 5; however, construction impacts at NSR 5, NSR 6, and NSR 7 would remain significant and unavoidable during these construction phases.

FTA Manual

Implementation of Mitigation Measure **MM-NOI-A** would be required to minimize the impact at NSR 5 (Future Residential Development) during the Foundations and Columns and Structural Steel and Gondola Equipment Erection phases; however, the construction impact would remain significant and unavoidable at NSR 5 during the Foundations and Columns phase.

- *Chinatown/State Park Station*

L.A. CEQA Thresholds Guide

Implementation of Mitigation Measure **MM-NOI-A** would be required to minimize impacts during the Foundations and Columns and Structural Steel and Gondola Equipment Erection phases; however, construction impacts at NSR 8 (Future Residential Development), NSR 9 (Blossom Plaza), NSR 10 (Future Residential Development), NSR 11 (Capitol Milling), NSR 12 (Residential Development), and NSR 14S (Los Angeles State Historic Park – South) would remain significant and unavoidable during these construction phases.

FTA Manual

Implementation of Mitigation Measure **MM-NOI-A** would be required to minimize the impact during the Foundations and Columns and the Structural Steel and Gondola Equipment Erection phases at NSR 8 (Future Residential Development); however, the construction impact would remain significant and unavoidable at NSR 8 during these phases.

- *Broadway Junction*

L.A. CEQA Thresholds Guide

With the implementation of Mitigation Measure **MM-NOI-A**, the construction noise impact at NSR 14N (Los Angeles State Historic Park – North) would be reduced to less than significant during the Vertical Circulation, Hardscape, Landscape, and Interior Work phase; however, construction impacts would remain significant and unavoidable at this receptor during the Demolition, Foundations and Columns, and Structural Steel and Gondola Equipment Erection construction phases.

Implementation of Mitigation Measure **MM-NOI-A** would be required to minimize impacts during all construction phases at NSR 16 (Cathedral High School), NSR 17 N (Low-Rise Residential – North), and NSR 17 S (Low-Rise Residential – South); however, construction impacts at NSR 16, NSR 17N, and NSR 17S would remain significant and unavoidable during all construction phases.

- *Stadium Tower*

L.A. CEQA Thresholds Guide

With the implementation of Mitigation Measure **MM-NOI-A**, the construction noise impact at NSR 16 (Cathedral High School) during the Foundations and Columns phase and NSR 17N (Low-Rise Residential – North) during the Foundations and Columns and Structural Steel and Gondola Equipment Erection phases would be reduced to less than significant.

References Section 3.13, Noise, of the Draft EIR, pages 3.13-31 through 3.13-76, and Appendix M, Noise and Vibration Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

5.1.1 Mitigation Measure

MM-NOI-A: **Prepare a Construction Noise Management Plan.** Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Construction Noise Management Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors. The Construction Noise Management Plan shall include the following measures to reduce noise levels:

- **Noise Barriers:** Temporary construction noise barriers between the Project construction area and affected receptors shall be installed as identified below. The noise barriers shall be designed to have a sound transmission class (STC) rating of at least 25 and should have the ability to provide a range of noise reduction between 5 dBA and 15 dBA when the construction equipment is located below the elevation level of the noise barrier and there is no line-of-sight between the construction equipment and the noise-sensitive receptors. Specific locations and heights for the temporary noise barriers shall include the following by Project components:
    - Alameda Station

- For the entire duration of construction, the Project shall provide a 24-foot tall temporary noise barrier between the Project construction site and NSR 3 [Mozaic Apartments].
- For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 1A [Union Station] and NSR 1B [First Five LA].
- During the Foundations and Columns phase, the Project shall provide a 10-foot temporary noise barrier between the Project construction activities occurring within Alameda Street and NSR 1A [Union Station], NSR 1B [First Five LA], NSR 2 [El Pueblo], and NSR 3 [Mozaic Apartments].
- During a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 3.

o Alameda Tower

- For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 4 [The California Endowment].
- During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 4.

o Alpine Tower

- For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 6 [Chinatown Senior Lofts] and NSR 7 [Homeboy Industries].
- During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 6 and NSR 7.

- NSR 5 [Future Residential] is currently an undeveloped City-owned parking lot and is proposed for future multi-family residential uses. If NSR 5 is occupied by residential units at the time of Project construction, the following noise barriers shall be provided:
  - For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 5.
  - During the Foundations and Columns and Structural Steel and Gondola Equipment Erection phases, the Project shall provide a 24-foot temporary noise barrier between the Project construction site and occupied residential units at NSR 5 [Future Residential].
  - During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 5.

- Chinatown/State Park Station
  - For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 9 [Blossom Plaza], NSR 10 [Future Residential Development], NSR 11 [Capitol Milling], and NSR 14S [Los Angeles State Park]. The noise barrier will include a gate that may be temporarily opened for access during construction hours along Spring Street for construction access.
  - For the entire duration of construction, the Project shall provide a 10-foot temporary noise barrier between the Chinatown / State Park Station and NSR 8 [College Station] and NSR 12 [Future Residential Development].
  - During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 8, NSR 12, and NSR 14S.

- Broadway Junction
  - For the entire duration of construction, the Project shall provide a 24-foot temporary noise barrier between the Project construction site

and NSR 13 [Future Development], NSR 14N [Los Angeles State Historic Park], and NSR 17 [Low Rise Residential].

- During the Demolition phase and the Foundations and Columns phase, the Project shall provide a 24-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School].
- During the Structural Steel and Gondola Equipment Erection phase and the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School]
- During a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 13, NSR 14 N, NSR 16, and NSR 17.

o Stadium Tower

- During the Foundations and Columns phase, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School] and NSR 17 [Low Rise Residential].
- During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between Project construction and NSR 16 and NSR 17.

- **Equipment Maintenance:** Construction equipment shall be properly maintained per manufacturers' specifications to prevent noise due to worn or improperly maintained parts and shall be fitted with the best available noise suppression devices (i.e., mufflers, lagging, and/or motor enclosures). All impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.
- **Electrical Sources:** When possible, on-site electrical sources shall be used to power equipment rather than diesel generators.
- **Sensitive Uses:** Fixed and/or stationary equipment (e.g., generators, compressors, concrete mixers) shall be located away from noise-sensitive receptors.

- **Community Outreach:** The following shall be implemented to reduce impacts to the local community related to disturbances from construction noise:
    - **Noise Disturbance Coordinator:** A noise and vibration disturbance coordinator shall be established. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator shall determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to address the complaint. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event a complaint is received, appropriate corrective actions shall be implemented, and a report of the action provided to the reporting party.
    - **Construction Notice:** The construction contractor shall provide a construction notice to residents within 500 feet of the construction site for each Project component prior to initiation of construction activities. The construction site notice shall include job site address, anticipated equipment to be used and duration of construction activities, permit number, name and phone number of the job superintendent, construction hours, and the City telephone number where violations can be reported. The notice will also include the phone number of the noise disturbance coordinator.
    - **Limit Idling Equipment:** Construction equipment shall not idle for longer than 5 minutes, as required by section 2485 of the California Code of Regulations.

Finding. Although the Project would implement Mitigation Measure **MM-NOI-A**, provided above, for the reasons discussed above, and in the Draft EIR, Metro finds that noise impacts related to Project construction would be significant. No feasible mitigation measures exist to mitigate these impacts. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines. As described in the Statement of Overriding Considerations, Metro has determined that this temporary impact is acceptable because of specific overriding considerations.

Threshold. *Excessive Ground-borne Vibration* (Construction; Human Annoyance): As discussed in Section 3.13, Noise, of the Draft EIR, temporary vibration impacts from Project construction related to human annoyance would be significant and unavoidable. Potential construction vibration impacts were evaluated for vibration-generating construction equipment that would be used for the Project, including vibratory rollers, loaded trucks, plate compactors, excavators and drill rigs. All vibration-generating equipment was evaluated, and it was determined that the worst-case vibration-generating equipment are vibratory rollers and loaded trucks depending upon the

type of construction activity occurring in proximity to the sensitive use. Construction activities would result in potential vibration impacts for several vibration-sensitive uses.

For human annoyance, the analysis determined that a vibratory roller would generate an impact when it is located within 135 feet of a residential use and 107 feet of an institutional use. Because construction sites (stations and towers) are generally in or near rights-of-way that are fronted by residential and institutional uses that are within these distances, they would be subject to this impact. In addition, for human annoyance, the analysis determined that a loaded truck would generate an impact when it is located within 73 feet of a residential use and 58 feet of an institutional use. Project haul routes are fronted by residential and institutional uses and therefore would be subject to this impact.

Significant human annoyance impacts would occur at Alameda Station (VSR-1, -2, -3 -4, -5, and -6), Alameda Tower (VSR-7, -8 and -9), Alpine Tower (VSR-10 and -11), Chinatown/State Park Station (VSR-13 and VSR-19), Broadway Junction (VSR-14, -15, -16, and -17) and along the Project's haul route. Potential vibration from loaded heavy trucks operating on local haul routes (primarily sections of Alameda Street, Spring Street, North Broadway, and Bishops Road) was also analyzed to determine construction vibration impacts. To analyze impacts, a reference level of 0.076 in/sec PPV and 86 VdB at 25 feet was used for loaded heavy trucks, which would translate to levels of 0.03 in/sec and 77 VdB at 50 feet and 0.01 in/sec and 68 VdB at 100 feet. Overall, these construction vibration levels would remain below the minimum potential damage threshold of 0.12 in/sec PPV. These construction vibration levels have the potential to result in some annoyance impacts for people within occupied structures that exist within 73 feet of the roadway for residential buildings or within 58 feet of the roadway for institutional buildings. However, it should be noted that all of these roadways currently carry a significant number of heavy trucks, and any such annoyance threshold is already being exceeded many times each day. Nevertheless, Project-related off-site construction vibration would exceed the human annoyance threshold, and impacts would be significant.

No feasible mitigation measures are available to reduce the vibration annoyance impacts identified for vibration sensitive receptors from on-site construction activities, as well as along the Project alignment for off-site construction activities. This is because the human annoyance threshold is exceeded by common occurrences such as vehicle pass-bys during construction. Such equipment is needed to build the Project and there is no alignment or haul route option that would create sufficient separation from adjacent uses to eliminate the human impact. As a result, vibration annoyance impacts would remain significant and unavoidable.

References Section 3.13, Noise, of the Draft EIR, pages 3.13-61 through 3.13-76; Appendix M, Noise and Vibration Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

Finding. Metro finds that the vibration (human annoyance) impacts related to Project construction would be significant. Since the human annoyance threshold is exceeded by common occurrences such as vehicle pass-bys during construction, there is no feasible method for mitigating human annoyance impacts. It should be noted that because the human annoyance threshold is so low it

is already exceeded on roadways by existing truck trips. Although the Project would implement Mitigation Measures **MM-VIB-A** and **MM-VIB-B**, provided below, these mitigation measures are designed to address potential building damage, and do not mitigate construction vibration impacts related to human annoyance, as discussed in the EIR. Accordingly, as discussed in the EIR, Metro finds that construction vibration impacts related to human annoyance would be significant. As stated above, no feasible mitigation measures exist to mitigate the on-site construction vibration impacts related to human annoyance. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines. As described in the Statement of Overriding Considerations, Metro has determined that this temporary impact is acceptable because of specific overriding considerations.

6. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT WITH MITIGATION

Metro finds that, based upon substantial evidence in the record, as discussed below, the following impacts associated with the Project are potentially significant, but can be reduced to less than significant levels by implementing the proposed mitigation measures identified below and in the MMRP. The following Findings summarize the analysis in the EIR, but do not purport to provide the full analysis of each environmental impact contained in the EIR. A full explanation of these environmental findings and conclusions can be found in the Draft EIR and Final EIR and these Findings hereby incorporate by reference the discussion and analysis in those documents, inclusive of their supporting technical appendices, supporting the Final EIR's determinations regarding mitigation measures and the Project's impacts and mitigation measures designed to address those impacts. As identified in the EIR, the Metro Board finds that changes or alterations which avoid or substantially lessen the significant environmental effects have been required in, or incorporated into, the Project.

6.1 BIOLOGICAL RESOURCES

As discussed in Section 3.4, Biological Resources, of the Draft EIR, the Project would result in potentially significant impacts related to biological resources with respect to the following significance thresholds:

- Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

- Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Threshold. *Candidate, Sensitive, or Special-Status Species*: (Construction) As discussed more fully in Section 3.4, Biological Resources, of the Draft EIR and in Appendix G, Supplemental Biological Resources Report, to the Final EIR, while there are no sensitive natural communities

such as wetlands, oak woodlands, or coastal sage scrub habitat in the Project area, there is potential roosting habitat for three special-status bat species in the Project area. Removal of mature palm and eucalyptus trees during construction of the Project could result in the removal of bat roost sites, resulting in a potentially significant impact to special-status bat species. Furthermore, birds protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC) have the potential to nest in the Project area. Tree removal during the nesting season would directly impact birds protected under the MBTA and CFGC. Construction activities would result in increased noise, vibration, dust, and human presence, resulting in bat and bird species avoiding the area, resulting in a potentially significant impact. To minimize impacts to a less-than-significant level, Mitigation Measures **MM-BIO-A** and **MM-BIO-B**, set forth below, would be implemented. In addition, in order to provide additional environmental benefits, the Project would implement several project design features related to Biological Resources. The incorporation of Project Design Feature BIO-PDF-A would establish a Tree Protection Zone to protect trees during construction and would apply to any trees within the construction footprint, or any trees where a portion of their drip line overhangs the construction footprint. In addition, the incorporation of BIO-PDF-B would establish an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan, BIO-PDF-G would require tree removal for the Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31), BIO-PDF-F would require compliance with applicable tree replacement requirements based on the jurisdiction of the property where each tree is located, BIO-PDF-E would provide for Tree Disease Management, and BIO-PDF-D would require the Project to avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities.

References. Section 3.4, Biological Resources, of the Draft EIR, pages 3.4-16 through 3.4-19; Appendix E, Biological Resources Assessment, of the Draft EIR; Appendix G, Supplemental Biological Resources Report, of the Final EIR; Appendix K.1, Updated Tree Report, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.1.1 Project Design Features

BIO-PDF-A: The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint, or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet, depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage.

BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan. The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components:

1. Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities.
2. An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species.
3. Annual reporting criteria and requirements.

BIO-PDF-D: The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.

BIO-PDF-E: **Tree Disease Management.** Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (Geosmithia morbida), Polyphagous Shot Hole Borer (Euwallacea spp.), and goldspotted oak borer (Agrilus auroguttatus) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using the best available management practices relevant for each tree disease observed. Any agreement between the proposed Project and a tree removal contractor would include the provisions for tree disease management.

BIO-PDF-F: The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees:

- City of Los Angeles:
  - "Protected" Trees: 4:1
  - Non-protected, but "significant" trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1
  - "Street trees" in the public ROW: as specified by Urban Forestry Division (typically 2:1)
- California Department of Parks and Recreation: At least 1:1
- Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1

BIO-PDF-G: Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).

6.1.2 Mitigation Measures

MM-BIO-A: **Avoid and minimize project related impacts to special-status and/or roosting bat species.** During the maternity season (April 15 through August 31) prior to

construction, a field survey shall be conducted by a qualified biologist to determine the potential presence of colonial bat roosts within 100 feet of the Alameda Station and Dodger Stadium Station footprints and SR-110 overpass over Stadium Way (near Stadium Tower), because these locations provide potentially suitable habitat. A visual inspection and/or one-night emergence survey of trees to be removed near the Alameda Station and Dodger Stadium Station and of the overpass shall be completed using acoustic recognition technology to determine if any maternity roosts are present.

To avoid any impacts on roosting bats resulting from construction activities for Stadium Tower, the following shall be implemented:

At the SR-110 Overpass

Should an active maternity roost be found at the SR-110 overpass, a determination (in coordination with a qualified bat biologist) shall be made whether indirect effects of construction-related activities (i.e., noise and vibration) could substantially disturb roosting bats, and if exclusionary devices should be used to remove bats. This determination shall be based on baseline noise/vibration levels, anticipated noise levels associated with construction of the Stadium Tower, and the sensitivity to noise-disturbances of the bat species present. If it is determined that noise could result in the temporary abandonment of a maternity roost, construction-related activities shall be scheduled to avoid the maternity season (April 15 through August 31), or as determined by the biologist.

To avoid any impacts on roosting bats resulting from construction activities at Alameda Station and Dodger Stadium Station, the following shall be implemented:

Trees

All trees to be removed as part of the Project at the Alameda Station, Stadium Tower, and Dodger Stadium Station sites should be evaluated for their potential to support bat roosts. In particular, any palm and eucalyptus trees that bats are known to use should be evaluated by a qualified biologist by conducting a one-night emergence survey during acceptable weather conditions; or if conditions permit, physically examine the trees for presence or absence of bats (such as with lift equipment) before the start of construction/tree removal. Palm trees are present at the Alameda Station site along Alameda Street and eucalyptus trees are present at the Dodger Stadium Station site. The following measures would apply to trees to be removed that are determined to provide potential bat roost habitat by a qualified biologist.

- If roosting bats are determined present during the maternity season (April 15 through August 31), the tree shall be avoided until after the maternity season, when the young are self-sufficient.

  If roosting bats are determined present during the winter months when bats are in torpor, a state in which the bats have significantly lowered their physiological

state, such as body temperature and metabolic rate, due to lowered food availability (October 31 through February 15, but is dependent on specific weather conditions), a qualified bat biologist shall physically examine the roost if conditions permit for presence or absence of bats (such as with lift equipment) before the start of construction. If the roost is determined to be occupied during this time, the tree shall be avoided until after the winter season when bats are once again active.

- Trees with potential colonial bat habitat can be removed outside of the maternity season and winter season (February 16 through April 14 and August 16 through October 30, or as determined by a qualified biologist) using a two-step tree trimming process that occurs over 2 consecutive days.
    - Day 1, Step 1: Under the supervision of a qualified bat biologist, tree branches and limbs with no cavities shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree will either abandon the roost immediately, or, after emergence, will avoid returning to the roost.
    - Day 2, Step 2: Removal of the remainder of the tree under the supervision of a qualified bat biologist may occur on the following day. Trees that are only to be trimmed and not removed would be processed in the same manner; if a branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist, and then the limb with the potential roost would be removed on Day 2.
- Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal.
- The results of bat surveys, evaluations, and monitoring efforts that are undertaken shall be documented in a report by the qualified biologist at the conclusion of all bat-related activities.

MM-BIO-B: **Avoid and minimize project-related impacts to nesting birds.** To avoid impacts to nesting birds protected under the MBTA and CFGC resulting from construction

activities that may occur during the nesting season, the following mitigation measure shall be implemented:

- Construction activities, including the clearance of trees potentially suitable for nesting birds, shall occur outside of the nesting season (generally February 1 through September 30). If construction activities must occur within this time period, the following measures shall be employed:
    - A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days (72 hours) prior to the start of construction activities to determine whether active nests are present within 500 feet of the construction zone. All nests found shall be recorded.
    - A minimum 300-foot no-work buffer shall be established around any active passerine bird nest. A minimum 500-foot no-work buffer shall be established around any active raptor nest. The qualified biologist shall monitor the nest on a weekly basis, and construction activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be postponed until the biologist determines that the nest is no longer active. However, the standard 300- to 500-foot no-disturbance buffer distance may be adjusted (including increases or reductions to the buffer) by a qualified biologist on a case-by-case basis, taking into consideration the location, type, duration and timing, and severity of work, distance of nest from work area, surrounding vegetation and line-of-sight between the nest and work areas (also taking into account existing ambient conditions from human activity within the line of sight), the influence of other environmental factors, and species' site-specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of work activities, the biologist shall immediately inform the construction manager, and all Project work shall cease (except access along established roadways) within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site.
    - Buffers will be delineated on-site with bright flagging for easy identification by project staff. The on-site construction supervisor and operator staff will be notified of the nest and the buffer limits, and instructed of the sensitivity of the area to ensure the buffer is maintained.
    - A summary of preconstruction surveys and methodologies employed, monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season.

Finding. The potentially significant impacts to biological resources would be mitigated through avoidance and minimization of project related impacts to special status and/or roosting bat

species and nesting birds. For the reasons discussed above and as set forth in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-BIO-A** and **MM-BIO-B**, the Project's impacts to biological resources related to candidate, sensitive, and special-status species would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Movement of Wildlife Species, Migratory Corridors, and Wildlife Nursery Sites*: (Construction) As discussed in Section 3.4, Biological Resources, of the Draft EIR, and Appendix G, Supplemental Biological Resources Report, to the Final EIR, while there are no wildlife corridors in the Project area to support movement of wildlife species, there are no Habitat Conservation Plans that overlap with the Project area, and the nearest Significant Ecological Area is approximately 5 miles north-northwest of Dodger Stadium at Griffith Park, construction activities would result in increased noise, vibration, dust, and human presence, which may result in bat and bird species avoiding areas where active construction is occurring. Such indirect effects would be temporary in nature and restricted to the duration of construction. As previously discussed in Threshold BIO-1, with implementation of the Project, indirect impacts (e.g., by noise causing abandonment of the nest) would be considered a potentially significant impact. Incorporation of **BIO-PDF-H** would require fencing used during construction to be made with materials that are not harmful to wildlife and **BIO-PDF-G** would require tree removal for the Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31). To minimize impacts to a less-than-significant level, Mitigation Measures **MM-BIO-A** and **MM-BIO-B**, set forth below, would be implemented.

References. Section 3.4, Biological Resources, of the Draft EIR, pages 3.4-20 through 3.4-21; Appendix E, Biological Resources Assessment, of the Draft EIR; Appendix G, Supplemental Biological Resources Report, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.1.3 Project Design Features

BIO-PDF-G: (see above).

BIO-PDF-H: Any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trash cans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.

6.1.4 Mitigation Measures

MM-BIO-A: Avoid and minimize project related impacts to special-status and/or roosting bat species (see above).

MM-BIO-B: Avoid and minimize project-related impacts to nesting birds (see above).

Finding. The potentially significant impacts to biological resources would be mitigated through avoidance and minimization of project related impacts to special status and/or roosting bat species and nesting birds. For the reasons discussed above and as set forth in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-BIO-A** and **MM-BIO-B**, the Project's impacts to wildlife species movement, migratory corridors, and wildlife nursery sites would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.2 CULTURAL RESOURCES

As discussed in Section 3.5, Cultural Resources, of the Draft EIR, the Project would create potentially significant impacts related to cultural resources with respect to the following significance thresholds:

- Would the Project cause a substantial adverse change in the significance of historical resources pursuant to § 15064.5?
- Would the Project cause a substantial adverse change in the significance of archaeological resources pursuant to § 15064.5?
- Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Threshold. *Historical Resources*: (Construction) As discussed in Section 3.5, Cultural Resources, of the Draft EIR, the Draft EIR analyzed potential impacts to historical resources, including the Los Angeles Union Station Passenger Terminal and Grounds (including the Macy Street Grade Separation); Los Angeles Plaza Historic District, (including contributing buildings); the *El Grito* mural; Philippe the Original; the Granite Block Paving; the Capitol Milling Company; 1035 N. Broadway; St. Peter's Italian Catholic Church; Cathedral High School; the Charles B. Wellman Residence; and the Arroyo Seco Parkway Historic District. Construction of the proposed Alameda Station has the potential to result in both direct and indirect impacts to The Winery, a contributor to the Los Angeles Plaza Historic District, and the *El Grito* mural, which is individually eligible for the NRHP and CRHR; however, in both cases impacts would be mitigated to less than significant. Implementation of Mitigation Measures **MM-VIB-A** and **MM-VIB-B**, would be implemented to mitigate these impacts to a less-than-significant level. In addition, Project Design Features CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D, and CUL-PDF-E, set forth below, would be incorporated, providing for pre- and post-construction conditions assessment and documentation. Construction-related impacts to all other historical resources would be less than significant.

References. Section 3.5, Cultural Resources, of the Draft EIR, pages 3.5-43 through 3.5-49; Appendix G, Historical Resource Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.2.1 Project Design Features.

CUL-PDF-A: Pre-Construction Documentation of The Winery. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. The report will:

1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation.
2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following:
    a. The full northern elevation (facing Cesar E. Chavez Avenue)
        i. The roofline, foundation, and any door, window, or walkway openings,
        ii. Detail views showing the typical existing condition of the exterior wall, and
        iii. Detail views showing any existing damage to the exterior such as cracks or spalling.
    b. West elevation (facing Olvera Street)
        i. The roofline, foundation, and any door, window, or walkway openings,
        ii. Detail views showing the typical existing condition of the exterior brick wall, and
        iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar.
    c. East elevation (facing Alameda Street)
        i. The roofline and foundation,
        ii. Detail views showing the typical existing condition of the exterior brick wall, and
        iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar.
3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage will be keyed to a sketch of the elevation indicating its location.

4. Include copies of historic photographs and other supporting documentation, if available.
5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need to only be distributed to repositories that express interest.
    a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs
    b. El Pueblo de Los Angeles Historical Monument Authority - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs
    c. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs

CUL-PDF-B: Post-Construction Documentation of The Winery. Post-Construction: After construction is complete, pictures of The Winery equivalent to CUL-PDF-A will be taken to objectively compare the condition of The Winery before and after construction.

In the event that damage to the Winery not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68).

El Grito (The Cry) Mural Project Design Features

CUL-PDF-C: Pre-Construction Documentation. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for the *El Grito* mural, per the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation. The report will:

1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation.
2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following:
    a. The entirety of the *El Grito* mural from edge to edge, looking straight on

b. The left half of the *El Grito* mural looking straight on

c. The right half of the *El Grito* mural looking straight on

d. Oblique views illustrating the curvature of the wall

e. Sequential photographs showing the various panels and subjects in greater detail

f. The back and sides of the curved wall on which the *El Grito* mural is located, and

g. Detail views showing:

i. Typical profile view of the *El Grito* mural (e.g., showing the depth of the tiles on the substrate)

ii. Notch shapes at the top two corners (two views, left and right)

iii. Curved shape of the sides of the *El Grito* mural (two views, left and right side)

iv. Typical grout between tiles in two or more locations

v. Bottom edge where the *El Grito* mural meets the plaza floor

vi. Any existing damage or deterioration prior to construction

3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage should be keyed to a sketch of mural indicating its location.

4. Include copies of historic photographs and other supporting documentation, if available.

5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need to be distributed to only repositories that express interest.

a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs

b. UC Santa Cruz Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs

c. Los Angeles Department of Cultural Affairs (DCA) - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs

d. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs

e. Mural Conservancy of Los Angeles - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs

f. Museo Eduardo Carillo - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs

CUL-PDF-D: Protection During Adjacent Construction. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will ensure that the *El Grito* mural is sufficiently protected from any inadvertent damage caused by construction activities. Following National Park Service guidance for protecting historical resources during nearby construction, the following measures, at a minimum, should be implemented:

1. Vibration monitoring equipment (VIB-A) should be carefully installed so that it does not permanently damage the face of the *El Grito* mural.

2. The El Grito mural should be cushioned and buttressed from either side of the wall with padded wood supports. The padding may consist of insulating foam or similar material.

3. A protective barrier or barriers made from plywood should be installed over the front, back, top, and sides of the *El Grito* mural and curved wall to diffuse the force of any potential physical contact. The barrier should include removable panels or a similar feature to ensure the vibration monitors and mural can be visually inspected during construction monitoring (CUL-PDF-C).

4. Plastic tarp or polyethylene sheeting should be secured over the wood barriers to protect against the accumulation of dust or contact with materials such as uncured concrete or other liquids that could damage or mark the surface of the *El Grito* mural.

5. All of the protective measures described above should be installed and secured in such a way that does not damage the *El Grito* mural or the wall on which it is located. The barrier will not be physically attached to the *El Grito* mural or wall with screws, nails, or other fasteners.

CUL-PDF-E: Construction Monitoring Plan (Built Resources). Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare a Construction Monitoring Plan in coordination with the DCA. The Construction Monitoring Plan will identify specific project milestones at which a qualified professional meeting the Secretary of the Interior's Standards for architectural

history or historic architecture will be notified by the Project Sponsor or Project Sponsor's contractor to visit the site and observe and document the *El Grito* mural's condition. Details will be recorded in construction monitoring memorandums submitted to DCA. These milestones will include, at a minimum:

1. Pre-Construction: Before protection measures are installed (CUL-PDF-D), to confirm the baseline condition of the *El Grito* mural is still consistent with the information presented in the HABS-like documentation (CUL-PDF-C).

2. Pre-Construction: Once protection measures (CUL-PDF-D) are installed, to ensure they are sufficient, and their installation has not damaged the *El Grito* mural.

3. Construction: After each phase of active construction

4. Post-Construction: After construction is complete and protective measures have been removed. At this stage, pictures of the *El Grito* mural equivalent to CUL-PDF-C will be taken to objectively compare the condition of the *El Grito* mural before and after construction.

The Construction Monitor will also be included on notifications from the real-time vibration monitoring equipment (VIB-A).

In the event that damage to the *El Grito* mural not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the Project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties 36 CFR Part 68.

6.2.2 Mitigation Measures

MM-VIB-A: **Vibration Monitoring.** Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for:

- Vibration Monitoring Equipment: the placement of vibration monitoring equipment approximately 26 feet away from the Avila Adobe (1970s addition), *El Grito* mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices.

- Modification of Vibration Equipment: the monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify the construction equipment to ensure that the vibration damage threshold is not exceeded.

MM-VIB-B: **Force-Adjustable Ground Compaction Devices.** For construction work occurring at the Alameda Station in proximity to the Avila Adobe (1970s addition), *El Grito* Mural, and The Old Winery:

- At a distance of 26 feet or more from the Avila Adobe (1970s addition), *El Grito* Mural and The Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. If the ground compacting equipment cannot achieve the assumed reference level, equipment with less vibration (less than 0.21 PPV, in/sec, at 25 feet), non-vibrating equipment, or hand tools shall be required for ground compaction activities.
- Any ground compaction or excavation/drilling operations within 26 feet of the Avila Adobe (1970s addition), *El Grito* Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools.

Finding. The potential impacts to historical resources would be mitigated by requiring vibration monitoring and use of force adjustable ground compaction devices during Project construction. For the reasons set forth above and in the EIR, Metro finds that, through implementation of Mitigation Measure **MM-VIB-A***, Vibration Monitoring* and Mitigation Measure **MM-VIB-B**, *Force-Adjustable Ground Compaction Devices*, the Project's impacts to cultural resources related to historical resources would be mitigated to less-than-significant levels. In addition, the Project would employ project design features related to pre- and post- construction conditions assessment and documentation of certain historic resources (Project Design Features CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D, and CUL-PDF-E). Because this impact related to cultural resources would be reduced to less-than-significant levels, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Archaeological Resources*: (Construction) As discussed in Section 3.5.4, Environmental Impacts, in the Cultural Resources section of the Draft EIR, there would be a significant impact to archaeological resources during Project construction. Areas of known archaeological historical resources are located within the Area of Direct Impacts for the Project (Resources 19-000887, 19-004320, 19-001575, associated with the proposed Alameda Station; Resource 19-004200, associated with the proposed Alameda Tower; Resource 19-003120, associated with the proposed Chinatown/State Park Station; and unevaluated Resources 19-004201 and 19-186112, associated with the proposed Alameda Tower; and Resource 19-173073, associated with the proposed Dodger Stadium Station.) In addition, the portion of Alameda Street that overlaps the construction footprint for the proposed Alameda Station is considered sensitive for the presence of archaeological resources. To minimize impacts to a less-than-significant level, Mitigation Measures **MM-CUL-A**, **MM-CUL-B**, **MM-CUL-C**, **MM-CUL-D**, **MM-CUL-E**, and **MM-CUL-F**, discussed below, would be implemented.

References. Section 3.5, Cultural Resources, of the Draft EIR, pages 3.5-56 through 3.5-62; Appendix F, Archaeological and Paleontological Resources Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.2.3 Mitigation Measures

MM-CUL-A: **Cultural Resources Monitoring and Mitigation Plan.** A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific Project components, such as the Chinatown/State Park Station, have requirements specific to that component, the CRMMP will lay out regulatory requirements (such as PRC 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda Station. The General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should "[i]dentify, document, evaluate, and interpret cultural resources at the Park," and "[p]rotect, stabilize, and preserve significant cultural resources within the Park." Specifically, the CRMMP shall be applicable to all ground-disturbance activities extending into native soil within known archaeological sites and other areas of high sensitivity. Excavations within a specified radius of known archaeological sites shall be monitored up to a depth at which the qualified archaeologist determines the base of the archaeological deposit has been reached. The qualified archaeologist shall supervise the archaeological monitor. Monitoring is expected to be required to the maximum depth of planned excavations at the Alameda Station and up to approximately 15 feet in depth at the Alameda Tower and the Chinatown/State Park Station. Work will also be monitored by Native American monitors in accordance with **Mitigation Measure TCR-A**. However, if in the course of excavations the qualified archaeologist determines that the site is disturbed or the sensitivity for significant archaeological resources is low because no resources have been encountered, then monitoring may be reduced or suspended. The monitoring plan shall define pre-construction coordination, construction monitoring for the excavations based on activities and depth of disturbance planned for each Project component (including ground-disturbing activities in native soil within known archaeological sites), unanticipated discovery protocols, data recovery (including halting or diverting construction so that archaeological resources can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement (including a curation plan), and reporting. The Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA. Preservation in place is the preferred method of treatment, but if preservation in place is not feasible, treatment may include implementation of archaeological data

recovery excavations to remove the resource. Key staff shall be identified, and the process of notification and consultation (where entities specific to each station would be identified) shall be specified within the CRMMP as well as protocols for reporting. If the discovery proves significant under CEQA and data recovery is the selected means of treatment, the archaeologist shall also be required to curate specimens in a repository with permanent retrievable storage and submit a written report to the lead agency within a year of completion of the fieldwork. Once complete, the final report shall be filed with the SCCIC.

For Resource 19-004200 and the granite paving (within the Area of Direct Impact of the Project) at Site 19-003120, the CRMMP shall describe the required documentation and treatment of the resources during excavation and potential removal.

MM-CUL-B: **Archaeological Resources Worker Training Program.** To mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, a qualified archaeologist shall be hired by the Project Sponsor to develop and conduct a worker training program for the Project with input from El Pueblo (as it pertains to the Alameda Station) and Los Angeles State Historic Park staff (as it pertains to the Chinatown/State Park Station) prior to the start of ground-disturbing activities. The training shall be prepared by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology and will be adjusted to the specific details at the two parks. The training shall provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources associated with the Project. Participation in the training by Los Angeles State Historic Park and El Pueblo staff, will be encouraged. In the event construction crews are phased or rotated, additional training shall be conducted for the new construction workers conducting ground-disturbing activities. The qualified archaeologist shall retain documentation demonstrating that the appropriate construction workers attended the worker training program. An appropriate presentation shall be prepared by a qualified archaeologist which shall describe and illustrate resources likely to be encountered by Project excavation and outline the protocol to be followed in the event of a find. If any archaeological resources are encountered during ground-disturbing activities, work shall be temporarily halted in the vicinity of the find and the Construction Contractor shall contact the qualified archaeologist to examine and evaluate the resource in accordance with the provisions of CEQA as outlined by the CRMMP.

MM-CUL-C: **Archaeological Testing Plan for 19-000887 and 19-004320 (Alameda Station).** To mitigate impacts to Resources 19-000887 and 19-004320, both of which include portions of the Zanja, an NRHP-eligible archaeological site, and where avoidance is not feasible, an archaeological testing plan and data recovery plan for the Area of Direct Impacts, which is located north of the Placita de Dolores, shall be prepared prior to ground-disturbing activities and implemented after the paving is removed. Although the proposed Project is designed to not impact the

portion of the Zanja Madre within 19- 000887, there is the potential to encounter either previously unrecorded portions of the Zanja or artifact refuse from the overall site. Therefore, a testing plan shall be prepared for the portions of the sites that will be impacted outside of the known Zanja location. Within the Project Area of Direct Impacts, resource 19-000887 overlaps unevaluated resource 19-004320, which will, therefore, also be included in the testing plan. The testing plan shall be prepared in consultation with El Pueblo de Los Angeles Historical Monument Authority specific to these resources at the Alameda Station.

The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts and contain maps showing the overlap of the sites with the project Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. The testing plan shall be implemented once the paving has been removed and far enough in advance of construction for there to be sufficient time to carry out the plan and to prepare a plan for and conduct a data recovery program if needed.

If significant archaeological remains are encountered that appear to contribute to the significance of the overall site during the test excavations and avoidance/preservation in place is not feasible, data recovery excavations will be required, and a data recovery plan shall be prepared and implemented. The data recovery plan shall detail the treatment of the surviving archaeological remains, if testing identifies any. The data recovery plan will specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.

MM-CUL-D: **Archaeological Testing Plan for LAUS Forecourt.** To mitigate impacts to Resource 19-001575, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria threshold that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation in place is not feasible, data recovery excavations will be required, and the data recovery plan shall be implemented. The data recovery plan

shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.

MM-CUL-E: **Archaeological Testing Plan for Los Angeles State Historic Park.** To mitigate unavoidable impacts to Resource 19-003120, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall be prepared in consultation with California State Parks and SHPO (per PRC 5024.5). The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project; and will specifically be used to confirm and define potential foundations for the Southern Pacific Railroad office/freight house that are shown in Sanborn fire insurance maps to overlap the Area of Direct Impacts for the station. The plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery.

If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation-in-place is not possible, data recovery excavations will be required, and the data recovery plan shall be implemented. The plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.

MM-CUL-F: **Redesign of Placement of Park Amenity Structures to Avoid Archaeological Features at Los Angeles State Historic Park Station.** After implementation of CUL-E, if it is found that the Los Angeles State Historic Park amenities (e.g., concessions and restroom) at the Los Angeles State Historic Park have the potential to impact any significant features found during the testing phase of CUL-E, the location of the Los Angeles State Historic Park amenity structures will be reconfigured to avoid and/or diminish impacts to those features as feasible.

Finding. The potential impacts to archaeological resources would be mitigated by the implementation of Mitigation Measures **MM-CUL-A**, **MM-CUL-B**, **MM-CUL-C**, **MM-CUL-D**, **MM-CUL-E**, and **MM-CUL-F**. For the reasons set forth above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-CUL-B**, **MM-CUL-C**, **MM-CUL-D**, **MM-CUL-E**, and **MM-CUL-F**, the Project's impacts to cultural resources related to archaeological resources would be mitigated to less-than-significant levels. Because this impact related to cultural resources would be reduced to less-than-significant levels, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Human Remains*: (Construction) As discussed in Section 3.5, Cultural Resources, of the Draft EIR, there is potential for a significant impact to human remains. Construction of the Project would require excavation at the Project component sites, which is anticipated to reach a maximum depth of 10 feet, except at the proposed Dodger Stadium where the maximum depth would be 42 feet. Piles for the proposed stations, towers, and junction would be drilled to a max depth of 125 feet. Resource 19-001575 is a large multi-component archaeological site located around LAUS. Approximately 500 feet southeast of the Area of Direct Impacts, a prehistoric and contact period cemetery was previously encountered which included at least 14 internments, 5 cremations, and scatters of human remains as well as associated artifacts. To minimize impacts to a less-than-significant level, Mitigation Measure **MM-CUL-D** set forth below, would be implemented.

References. Section 3.5, Cultural Resources, of the Draft EIR, pages 3.5-63 through 3.5-64; Appendix F, Archaeological and Paleontological Resources Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.2.4 Mitigation Measures

MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt (see above).

Finding. The potential impacts to human remains would be mitigated by implementing an Archaeological Resources Testing Plan and avoidance of archaeological features. By implementing Mitigation Measure **MM-CUL-D**, the Project's impacts to cultural resources related to human remains would be mitigated to less-than-significant levels. Because this impact related to cultural resources would be reduced to less-than-significant levels, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.3 GEOLOGY AND SOILS

As discussed in Section 3.7, Geology and Soils, of the Draft EIR, the Project would create potentially significant impacts related to geology and soils with respect to the following significance thresholds:

- Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

- Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the current CBC, creating substantial direct or indirect risks to life or property?

- Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Threshold. *Rupture of a Known Earthquake Fault; Strong Seismic Ground Shaking; Seismic-Related Ground Failure, Including Liquefaction; or Landslides*: (Construction) As discussed more fully in Section 3.7, Geology and Soils, of the Draft EIR, there would be a potentially significant impact during Project construction associated with potential adverse effects involving strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides. The Project area is in a seismically active region of southern California, however, the Project alignment is not in an Alquist-Priolo Earthquake Fault Zone. The fault closest to the Project site is the Elysian Park fault. According to the U.S. Geological Survey Quaternary fault and fold database, the location of the Upper Elysian Park fault is inferred to cross under the alignment. The Upper Elysian Park fault is a north-to-northeast–dipping fault that underlies the northern Los Angeles basin from Griffith Park to Garvey Reservoir. However, the Elysian Park fault is a blind thrust fault, which means it is not capable of surface fault rupture, and therefore is not subject to the conditions of the Alquist-Priolo Act. The Elysian Park thrust fault is considered to be seismogenic (capable of generating earthquakes) from a depth of approximately 2 miles below ground surface in the south-southwest, to approximately 10 miles below ground surface in the north-northeast. Accordingly, impacts related to rupture of a known earthquake fault would be less than significant. However, the Alameda Station, Alameda Tower, Alpine Tower, Chinatown/State Park Station, and Broadway Junction are in an area potentially subject to liquefaction, and liquefaction-induced settlement can be exacerbated by increased loading during construction activities. Further, the northeastern portion of the proposed Project alignment is adjacent to areas mapped as a potential earthquake-induced landslide zone. The Stadium Tower and Dodger Stadium sites are in a City-designated hillside area, and are potentially susceptible to landslides. Accordingly, impacts related to strong seismic ground shaking, seismic related ground failure, and/or liquefaction, and earthquake-induced slope failure could be considered significant during construction of the Project. The Project would be constructed in accordance with applicable standards, requirements, and building codes, which would ensure structural integrity and safe construction. Additionally, to minimize impacts to a less-than-significant level, Mitigation Measure **MM-GEO-A**, set forth below, would be implemented.

References. Section 3.7, Geology and Soils, of the Draft EIR, pages 3.7-14 through 3.7-15; Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.3.1 Mitigation Measure

MM-GEO-A: Prepare a Site-Specific Final Geotechnical Report. The Project Sponsor shall engage a California-registered geotechnical engineer to prepare and submit a site-specific final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and California Geological Survey Special Publication 117 (as amended). A site-specific geotechnical exploration program, along with associated laboratory testing, is necessary to complete a design-level evaluation of the geologic hazards and conditions, seismic hazards, grading conditions, and

foundation capacities. The site-specific final geotechnical report shall provide a description of the geological and geotechnical conditions at the site; the findings, conclusions, and mitigation recommendations for potential geologic and seismic hazards; and design-level geotechnical recommendations in support of grading and foundation design. Additionally, the geotechnical report shall include recommended measures to reduce potential impacts related to landslides, subsidence, liquefaction, differential settlement, expansive soils, soil corrosivity, or other potential ground failures induced by the proposed Project. The submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety. The Project Sponsor shall implement the recommendations contained in the approved report during project design and construction.

Finding. With compliance with existing laws and regulations, and implementation of Mitigation Measure **MM-GEO-A**, the potential impacts related to rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Unstable Soils*: (Construction) As discussed more fully in Section 3.7, Geology and Soils, of the Draft EIR, there would be a significant impact during Project construction associated with the Project's location on soil that is unstable, or that would become unstable as a result of the proposed Project, as a portion of the Project alignment near Stadium Way and Downtown Gate E is underlain by artificial fill placed during construction of Dodger Stadium, and other portions of the project alignment are in an area mapped as potentially subject to liquefication. The Stadium Tower and Dodger Stadium sites are in a City-designated hillside area, and are potentially susceptible to landslides. Further, in general, settlement can be exacerbated along the entire alignment by increased loading during construction activities. Therefore, impacts related to lateral spreading, subsidence, liquefaction, or collapse during grading and construction of the Project components would be potentially significant. To minimize impacts to a less-than-significant level, Mitigation Measure **MM-GEO-A**, set forth below, would be implemented, and the Project would be constructed in accordance with applicable standards, requirements, and building codes, which would ensure structural integrity and safe construction.

References. Section 3.7, Geology and Soils, of the Draft EIR, pages 3.7-16 through 3.7-17; Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.3.2 Mitigation Measure

MM-GEO-A: Prepare a Site-Specific Final Geotechnical Report (see above).

Finding. With compliance to existing standards and codes and implementation of Mitigation Measure **MM-GEO-A**, the potential impacts related to unstable soils, landslides, lateral spreading, subsidence, liquefaction, or collapse would be reduced to a less-than-significant level. For each

of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Expansive Soils*: (Construction) As discussed more fully in Section 3.7, Geology and Soils of the Draft EIR, there would be a significant impact during Project construction associated with Project location on expansive soils. Mandatory compliance with applicable standards, requirements, and building codes would ensure structural integrity and safe construction, and the impact would be less than significant under the Project. In addition, implementation of Mitigation Measure **MM-GEO-A** would further reduce impacts related to soil corrosion under the Project.

References. Section 3.7, Geology and Soils, of the Draft EIR, page 3.7-18; Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.3.3 Mitigation Measure

MM-GEO-A: Prepare a Site-Specific Final Geotechnical Report (see above).

Finding. With compliance to existing standards and codes, the potential impacts related to expansive soils would be reduced to a less-than-significant level. Implementation of Mitigation Measure **MM-GEO-A**, requiring soil samples be tested for corrosivity, would further reduce impacts related to soil corrosion under the Project. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Paleontological Resources*: (Construction) As discussed more fully in Section 3.7, Geology and Soils, of the Draft EIR, there would be a significant impact during Project construction associated with potential for directly or indirectly destroying a unique paleontological resource or site or unique geologic feature. To minimize impacts to a less-than-significant level, Mitigation Measure **MM-GEO-B**, set forth below, would be implemented.

References. Section 3.7, Geology and Soils, of the Draft EIR, pages 3.7-19 through 3.7-20; Appendix F, Archaeological and Paleontological Resources Assessment, of the Draft EIR.

6.3.4 Mitigation Measure

MM-GEO-B: Prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). A PRMMP shall be developed by a qualified paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The plan shall apply to paleontologically sensitive deposits, including older Quaternary alluvium and Puente formation deposits, that may be impacted by the proposed Project, as determined by a qualified paleontologist in consultation with the construction team and guided by geotechnical coring. The qualified paleontologist shall supervise the paleontological monitor, who shall be present during construction excavations into older Quaternary alluvial deposits and Miocene Puente formation deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains, and where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of

monitoring inspections shall be determined by the paleontologist, and shall be based on the rate of ground-disturbing activities, the material being excavated, and the depth of excavation; and if found, the abundance and type of paleontological materials. If any paleontological materials are found, the paleontological monitor shall temporarily divert or redirect ground-disturbing activities in the area of the exposed fossil to facilitate evaluation, and if necessary, salvage. The paleontologist shall assess the discovered material(s) and provide a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, as appropriate. The Project Sponsor shall comply with the recommendations of the evaluating paleontologist, and ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the paleontologist's satisfaction. If paleontological materials are found, the paleontologist shall prepare a report identifying the resource and the recommendations proposed and implemented, within 1 year of completion of the fieldwork. A copy of the report shall be submitted to the Los Angeles County Natural History Museum.

Finding. With the implementation of Mitigation Measure **MM-GEO-B**, the potential impacts related to paleontological resources would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.4 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, the Project would result in potentially significant impacts related to hazards and hazardous materials with respect to the following significance thresholds:

- Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials to the environment?
- Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Threshold. *Routine Transport, Use, or Disposal of Hazardous Materials*: (Construction) As discussed more fully in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, impacts related to routine transport, use, or disposal of hazardous materials would be potentially significant. There is potential to encounter contaminated soils or other hazardous materials during excavation and construction activities at Project sites. Construction of the Broadway Junction would also require demolition of the existing building at the 1201 North Broadway property. Based on an asbestos and lead-based paint survey of the property in 2003, asbestos-containing materials (ACMs) and lead-based paints (LBPs) were detected in various locations throughout the existing building. To minimize impacts to a less-than-significant level, Mitigation Measures **MM-HAZ-A** and **MM-HAZ-B**, discussed below, would be implemented.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, pages 3.9-22 through 3.9-24; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.4.1 Mitigation Measures

MM-HAZ-A: **Prepare a Soil and Groundwater Management Plan.** The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures are encountered during Project construction. The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater in order to classify them as either hazardous or non-hazardous; and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations and be protective of workers and the environment.

This Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.

MM-HAZ-B: **Hazardous Materials Abatement.** Prior to demolition of the existing building at 1201 North Broadway, a licensed abatement contractor will conduct hazardous materials abatement, which would remove, dispose of, and transport hazardous materials in accordance with federal, state, and local regulations. The licensed abatement contractor would be required to comply with Cal/OSHA regulations governing asbestos standards and lead paint standards (California Code of Regulations Article 4 Sections 1529, 5208, and 1532), OSHA 29 Code of Federal Regulations Section 1926.62 regarding lead in construction, and OSHA 29 Code of Federal Regulations Section 1926.1101 regarding asbestos exposure. The contractor would also be required to comply with SCAQMD Rule 1403, related to asbestos emissions during building demolition activities. Safe work measures would be taken during the hazardous materials abatement, including wetting the area to prevent possible release of hazardous materials into the air and removing dust with high-efficiency particulate air vacuums and/or disposable wet wipe towels.

Finding. The potential impacts related to hazards and hazardous materials described above would be mitigated by requiring compliance with a Soil and Groundwater Management Plan and undertaking hazardous materials abatement at the Broadway Station site. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-HAZ-A** and **MM-HAZ-B**, the Project's impacts associated with routine transport, use, or disposal of Hazardous Materials would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Hazardous Materials Release*: (Construction) As discussed more fully in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, impacts related to the release of hazardous materials into the environment would be potentially significant. Relatively small quantities of hazardous materials that would be used during construction activities (e.g., petroleum-based products, paints, solvents, sealers) would be transported, used, stored, and disposed of according to City, County, State, and federal regulations. Construction activities would be temporary in nature and would involve the limited transport, storage, use, and disposal of hazardous materials. There exists a potential for hazardous materials and waste spills to occur. Furthermore, based on the age of the existing building at 1201 North Broadway, there is a potential for the presence of ACMs and LBPs. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. To mitigate these impacts to a less-than-significant level, Mitigation Measures **MM-HAZ-A** and **MM-HAZ-B**, described below, would be implemented.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, pages 3.9-25 through 3.9-27; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.4.2 Mitigation Measures

MM-HAZ-A: **Prepare a Soil and Groundwater Management Plan** (see above).

MM-HAZ-B: Hazardous Materials Abatement (see above).

Finding. The potential impacts related to release of hazardous materials described above would be mitigated by requiring compliance with a Soil and Groundwater Management Plan and undertaking hazardous materials abatement at the Broadway Junction site. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-HAZ-A** and **MM-HAZ-B**, the Project's impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials to the environment would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Hazardous Materials within One-Quarter Miles of a School*: (Construction) As discussed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, three schools are located within 0.25 mile of the proposed Alpine Tower and Chinatown/State Park Station. The closest school to the Project alignment is Cathedral High School, adjacent to and directly west of the construction staging area for the Broadway Junction. While not considered acutely hazardous, Project construction would involve temporary use of limited quantities of hazardous materials, such as solvents, paints, oils, hydraulic fluids, gasoline, and diesel fuel. Mitigation Measure **MM-HAZ-A** would establish requirements for the handling, management and disposal of any contaminated soils or structures that prevent unacceptable exposure to contaminated soils or vapors during construction at any nearby school. Any handling of hazardous materials used during construction of this alternative would be regulated by federal, State, and local standards. The Project would require the demolition of the building at 1201 North Broadway to construct the Broadway Junction. ACMs and LBPs were detected in various locations throughout the existing building at 1201 North Broadway. Implementation of Mitigation Measure **MM-HAZ-B** would require the Project to conduct hazardous materials abatement by a licensed abatement contractor prior to demolition, which would remove, dispose of, and transport hazardous materials in accordance with federal, State, and local regulations. Potential impacts related to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school would be reduced to less than significant with implementation of Mitigation Measures **MM-HAZ-A** and **MM-HAZ-B**, discussed below.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, pages 3.9-27 through 3.9-28; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.4.3 Mitigation Measures

MM-HAZ-A: Prepare a Soil and Groundwater Management Plan (see above).

MM-HAZ-B: Hazardous Materials Abatement (see above).

Finding. The potential impacts related to hazardous emissions or handling of hazardous materials within one-quarter mile of an existing or proposed school would be mitigated by requiring compliance with a Soil and Groundwater Management Plan and undertaking hazardous materials abatement at the Broadway Station site. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-HAZ-A** and **MM-HAZ-B**, the

Project's impacts associated with hazards and hazardous materials within one-quarter mile of a school would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Hazardous Materials Sites*: (Construction) As discussed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, an environmental database report search identified five properties that coincide with Project component sites: LAUS and El Pueblo de Los Angeles, which is the proposed location of construction support space and vertical circulation elements for the Alameda Station; 901 North Main Street, which is the proposed location of the Alpine Tower; the Los Angeles State Historic Park property, the proposed location of the Chinatown/State Park Station; and the 1201 North Broadway property, the proposed location of the Broadway Junction. The remaining Project component sites (Alameda Tower, Stadium Tower, and Dodger Stadium Station) were not listed in hazardous materials databases. During construction, the Project may encounter contaminated soils or groundwater, and impacts with associated with these sites would be potentially significant. Implementation of Mitigation Measures **MM-HAZ-1** and **MM-HAZ-B** would mitigate these impacts to a less-than-significant level. Therefore, impacts relating to hazardous materials sites would be less than significant with mitigation.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, pages 3.9-29 through 3.9-30; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.4.4 Mitigation Measures

MM-HAZ-A: Prepare a Soil and Groundwater Management Plan (see above).

MM-HAZ-B: Hazardous Materials Abatement (see above).

Finding. The potential impacts associated with hazardous materials sites as determined under Government Code section 65962.5 would be mitigated by requiring compliance with a Soil and Groundwater Management Plan and undertaking hazardous materials abatement at the Broadway Junction site. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-HAZ-A** and **MM-HAZ-B**, the Project's impacts associated with hazards and hazardous materials sites would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Emergency Response Plan or Emergency Evacuation Plan*: (Construction) As discussed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, construction activities would not interfere with the implementation of the City's Emergency Operations Plan and Annexes, including the Evacuation Annex, which outlines the responsibilities and procedures for City departments, such as LAPD and LAFD, for hazards and evacuations in the event of an emergency. The Evacuation Annex identifies the needed and available evacuation capabilities and resources, and describes how these resources are mobilized. For example, the Evacuation Annex notes each department's responsibilities and tasks in the event of an emergency. Coordination with the LAPD and LAFD during the permitting process would be required to ensure

that the proposed Project's construction activities would not interfere with any of the departments' prescribed roles or responsibilities. In addition, as discussed in Section 3.17, Transportation, of the Draft EIR, the Project would implement Mitigation Measure **MM-TRA-B**, which requires preparation of a Construction Traffic Management Plan. The Construction Traffic Management Plan would be required to ensure adequate emergency access is maintained in and around the Project alignment and component sites throughout all construction activities. Therefore, construction activities would also not interfere with the implementation of the Los Angeles County Operational Area Emergency Response Plan, which is intended to establish the emergency management system, including prevention, protection, response, recovery, and mitigation in the Los Angeles County Operational Area, including the City of Los Angeles. Additionally, the Los Angeles County Operational Area Emergency Response Plan stipulates that each agency/jurisdiction in the operational area is responsible for the completion of its own hazard mitigation plan. With respect to hazards, the City of Los Angeles Safety Element in the General Plan contains a Local Hazard Mitigation Plan (LHMP) that provides information related to hazard identification and planning in Los Angeles and outlines compliance with State regulations. With adherence to these State regulations and the City's General Plan, construction activities would not interfere with the LHMP. Therefore, construction of the Project would not substantially impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. However, to provide additional environmental benefits in the Hazards context, Mitigation Measure **MM-TRA-B** and Mitigation Measure **MM-TRA-C** would be implemented as part of the Project to reduce transportation-related impacts. Therefore, impacts would be less than significant with mitigation incorporated.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, page 3.9-46; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.4.5 Mitigation Measure

MM-TRA-B: **Construction Traffic Management Plan.** Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project. The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed

and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.

- Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with Mitigation Measure TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations.

- Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT and would be implemented by the proposed Project if deemed necessary.

- As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic and bicyclists to alternative routes during these periods.

- Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction.

- Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

- Conduct bi-monthly construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project, or as otherwise determined appropriate by City Staff.

- Provide off-site truck staging in a legal area furnished by the construction truck contractor.

- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.

- During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction. Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.

MM-TRA-C: **Temporary Disaster Route Plan**. Prior to the issuance of a building permit for the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall submit a temporary disaster route plan to LADOT, which shall include street closure information and detour plans in order to facilitate the movement of emergency vehicles through the study area and minimize effects on emergency response during a disaster. Construction activities and temporary lane closures could quickly be halted in event of an emergency to allow emergency vehicles to travel through the work zones. In addition to detours, the temporary disaster route plan could also include temporary operational measures that would be implemented by the City during a disaster, including temporary contra-flow lanes or reversing directions to flush vehicles during a disaster situation. The temporary disaster route plan would be prepared for the following locations:

- During those periods when construction of the Alameda Station, the Chinatown/State Park Station, and the Alameda and Alpine Towers require partial closure of one direction or full closure of both directions of Alameda Street or Spring Street.

Finding. The potential impacts related to hazards and hazardous materials described above would be mitigated by the incorporation of visibility enhancements and the preparation of a Construction Traffic Management Plan. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-TRA-B** and **MM-TRA-C**, the Project's impacts associated with an emergency response plan or evacuation plan would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.5 LAND USE AND PLANNING

As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the Project would result in potentially significant impacts related to land use and planning with respect to the following significance thresholds:

- Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Threshold. *Conflict with Land Use Plan, Policy, or Regulation*. As discussed more fully in Section 3.11, Land Use and Planning, of the Draft EIR, State Parks has determined that the Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the Project's Chinatown/State Park Station. State Parks considers this inconsistency a potentially significant impact. To minimize impacts to a less-than-significant level, Mitigation Measure **MM-LUP-A**, discussed below, would be implemented.

References. Section 3.11, Land Use and Planning, of the Draft EIR, pages 3.11-37 through 3.11-77; Section 5.0, Corrections and Additions, of the Final EIR.

6.5.1 Mitigation Measures

MM-LUP-A: Obtain a Los Angeles State Historic Park General Plan Amendment. Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan.

Finding. The potential impacts related to land use and planning described above would be mitigated by obtaining a Los Angeles State Historic Park General Plan Amendment. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measure **MM-LUP-A**, the Project's impacts associated with inconsistency with the Los Angeles State Historic Park General Plan would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.6 NOISE

As discussed in Section 3.13, Noise, of the Draft EIR, the Project would result in potentially significant impacts related to vibration with respect to the following significance thresholds:

- Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Threshold. *Excessive Ground-borne Vibration* (Construction; Building Damage): As discussed in Section 3.13, Noise, of the Draft EIR, temporary vibration impacts from Project construction related to building damage would be potentially significant with respect to Alameda Station. The use of vibration-generating equipment in close proximity to structures at El Pueblo associated with installation of the vertical circulation elements for the Alameda Station would exceed the vibration damage threshold of 0.2 PPV inches per second at the Old Winery (VSR-5), El Grito Mural (VSR-2), and Avila Adobe -1970s addition (VSR-4b). To minimize impacts to a less-than-significant level, the Project would implement Mitigation Measures **MM-VIB-A** and **MM-VIB-B**.

References Section 3.13, Noise, of the Draft EIR, pages 3.13-61 through 3.13-76; Appendix M, Noise and Vibration Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.6.1 Mitigation Measures

MM-VIB-A: Vibration Monitoring (see above)

MM-VIB-B: Force-Adjustable Ground Compaction Devices (see above)

Finding. The potential vibratory impacts related to building damage described above would be mitigated by requiring a Vibration Monitoring Plan and limitations on the use of ground compaction equipment. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-VIB-A** and **MM-VIB-B**, the Project's vibratory impacts associated with building damage would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.7 PUBLIC SERVICES

As discussed in Section 3.16, Public Services, of the Draft EIR, the Project would result in potentially significant impacts related to public services with respect to the following significance thresholds:

- Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:
    - Fire protection;
    - Police protection;
    - Schools;
    - Parks; or
    - Other public facilities?

Threshold. *Fire Protection*. (Construction) As discussed more fully in Section 3.15, Public Services, of the Draft EIR, there would be a significant impact during Project construction associated with a temporary increase in demand for fire protection services at the Project site and roadway lane closures that may indirectly impact acceptable service ratios, response times, or other performance objectives for fire protection. To minimize impacts to a less-than-significant level, Mitigation Measure **MM-TRA-B**, set forth below, would be implemented. To provide additional environmental benefits related to fire protection, the Project would implement WFR-PDF-A, which would require that the Project the prepare a Fire Protection Plan to be implemented during construction of the Broadway Junction, Stadium Tower, and Dodger Stadium Station.

References. Section 3.15, Public Services, of the Draft EIR, pages 3.15-17 through 3.15-19.

6.7.1 Project Design Feature

- **WFR-PDF-A:** The Project will prepare a Fire Protection Plan, which will be implemented during construction of the Broadway Junction, Stadium Tower, and Dodger Stadium Station. The Fire Protection Plan will include the following measures that shall be implemented to the extent applicable in order to further reduce risks associated with ignition of wildland fire:

    - Prior to the start of any construction activities, a Fire Prevention Program Superintendent shall be designated to interface with the LAFD and coordinate fire watch and site fire prevention and response.

    - In exceedance of regulatory requirements, the Fire Prevention Program Superintendent shall prohibit hot work construction activities during Red Flag Warnings, which are issued for a stated period of time by the National Weather Service using pre-determined criteria to identify particularly critical wildfire danger in a particular geographic area.

    - Prior to the start of any hot work construction activities, the Fire Prevention Program Superintendent will implement tiered fire watches with increased staff tasked with monitoring for ignitions during hot work activities (fire watch). The fire watch shall be provided during hot work and shall continue to monitor for a minimum of 30 minutes following completion of the hot work activities. The Fire Prevention Program Superintendent may determine during construction that this monitoring period be increased based on the potential for weather conditions that may increase the potential for sparks to be carried by the wind and result in ignition (i.e., the potential for high wind events, high temperature, and/or low relative humidity).

    - Prior to the start of any construction activities, the construction manager in coordination with the Fire Prevention Program Superintendent shall provide site fire safety training for all construction crew members, including on the regulatory requirements set forth in Section 3.20.2, the proper use of firefighting equipment, and procedures to be followed in the event of a fire. Project staff shall be trained prior to the start of construction to identify and report to the appropriate authority potential fire safety hazards, including the presence of sparks or smoke. The construction manager shall maintain training records which will be available for review by Metro, the City, and LAFD.

    - Prior to the start of construction, the construction area shall be cleared of all dead and downed vegetation and dead or dry leaves and pine needles from the ground. Trees within the construction area shall either be removed or trimmed to keep branches a minimum of 10 feet from other trees. Vegetation

within the construction area shall be controlled through periodic cutting and spraying of weeds.

- Ongoing fire safety inspections and patrols of the construction site shall be integrated into Project site security procedures for the duration of construction. The assigned fire patrols shall verify the proper tools and equipment are on site, serve as a lookout for fire starts, including participating in a fire watch to make sure no residual fire exists following the completion of the construction activity.

- Each construction area shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small flames.

- The Fire Prevention Program Superintendent shall provide outreach and orientation services to responding fire stations including pre-staging measures prior to the start of hot work construction activities.

- Any fire ignited on site shall be promptly reported to LAFD

6.7.2 Mitigation Measure

MM-TRA-B: Construction Traffic Management Plan (see above).

Finding. The potential impacts related to fire protection services described above would be mitigated by requiring a Construction Traffic Management Plan. For the reasons set out above and in the Draft EIR, Metro finds that, through implementation of Mitigation Measure **MM-TRA-B**, the Project's impacts associated with increased demand for fire services would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Police Protection*: (Construction) As discussed more fully in Section 3.15, Public Services, of the Draft EIR, there would be a significant impact during Project construction associated with a temporary increase in demand for police protection services. To minimize impacts to a less-than-significant level, Mitigation Measure **MM-TRA-B***,* set forth above, would be implemented.

References. Section 3.15, Public Services, of the Draft EIR, pages 3.15-21 through 3.15-23.

6.7.3 Mitigation Measures

MM-TRA-B: Construction Traffic Management Plan (see above).

Finding. The potential impacts related to police protection services described above would be mitigated by requiring a Construction Traffic Management Plan. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measure **MM-TRA-B**, the Project's impacts associated with increased demand for fire services would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Schools*: (Construction) As discussed more fully in Section 3.15, Public Services, of the Draft EIR, there would be a significant impact during Project construction of the Broadway Junction would result in temporary impacts related to dust, noise, and lane closures that may indirectly impact Cathedral High School. In addition, temporary lane closures during construction would increase traffic volumes on detour routes, which could increase traffic congestion on those routes, requiring measures to ensure adequate emergency access is maintained in and around the Project alignment and component sites, as well as to ensure that adequate traffic signals and crossing guard personnel are present throughout construction where both existing and unsignalized school crosswalks and crossings occur along proposed detour routes. To minimize impacts to a less-than-significant level, Mitigation Measure **MM-TRA-B***,* set forth above, would be implemented.

References. Section 3.15, Public Services, of the Draft EIR, pages 3.15-24 through 3.15-25.

6.7.4 Mitigation Measure

MM-TRA-B: Construction Traffic Management Plan (see above).

Finding. The potential impacts related to schools described above would be mitigated by requiring a Construction Traffic Management Plan. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measure **MM-TRA-B**, the Project's impacts associated with schools would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Other Public Services*: (Construction) As discussed more fully in Section 3.15 of the Draft EIR, there would be a significant impact during Project construction due to temporary lane closures that would increase traffic volumes on detour routes, which could increase traffic congestion. To minimize impacts to a less-than-significant level, Mitigation Measure **MM-TRA-B** set forth below, would be implemented.

References. Section 3.15, Public Services, of the Draft EIR, pages 3.15-25 through 3.15-26.

6.7.5 Mitigation Measure

MM-TRA-B: Construction Traffic Management Plan (see above).

Finding. The potential impacts related to other public services described above would be mitigated by requiring a Construction Traffic Management Plan. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measure **MM-TRA-B**, the Project's impacts associated with other public services would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.8 TRANSPORTATION

As discussed in Section 3.17, Transportation, of the Draft EIR, the Project would result in potentially significant impacts related to transportation with respect to the following significance thresholds:

- Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Would the Project result in inadequate emergency access?

Threshold. *Geometric Design Features*: (Construction and Operations)

Construction. As discussed more fully in Section 3.17, Transportation, of the Draft EIR, Project construction would introduce lane closures and closed worksites within City streets for construction activities, such as foundations and steel erection. Construction worksites would be fenced, and features such as lane closures and associated lane tapers, temporary advance warning signs, and detour signs would be implemented to ensure that no significant temporary geometric design hazards are introduced during the construction period after mitigation. Construction of the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use with implementation of Mitigation Measure **MM-TRA-B**. As Project features get constructed, such as columns, the potential for visibility obstructions detailed below for operations could be introduced. As these features are constructed, Mitigation Measure **MM-TRA-A**, would be implemented concurrently to ensure that these impacts would be less than significant during construction.

Operations. During operations, the Alameda Tower would obstruct the horizontal line of sight between a westbound vehicle on Alhambra Avenue, approaching the right turn onto northbound Alameda Street, and a vehicle traveling northbound on Alameda Street, 250 feet upstream of the intersection. At Chinatown/State Park Station, pedestrians who cross outside of the crosswalk to the west of columns developed as part of the Project could be obstructed for motorists traveling southbound on Spring Street making a right turn into the driveway. To mitigate these impacts to a less-than-significant level, Mitigation Measure **MM-TRA-A***,* described below, would be implemented. In addition, to provide for additional environmental benefits and as a best practice to further enhance pedestrian visibility, the Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

References. Section 3.17, Transportation, of the Draft EIR, pages 3.17-39 through 3.17-45; Appendix N, Transportation Appendices, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.8.1 Project Design Features

TRA-PDF-A: **Additional Visibility Enhancements**: Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add

upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

6.8.2 Mitigation Measure

MM-TRA-A: Visibility Enhancements. Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design the following visibility enhancements at the following locations:

- Alameda Tower – Implement a no right turn on red restriction to prohibit vehicles from making a right turn on red from westbound Alhambra Avenue to northbound Alameda Street.
- Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks.

The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations.

MM-TRA-B: Construction Traffic Management Plan (see above).

Finding. The potential impacts related to Transportation described above would be mitigated by requiring visibility enhancements. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-TRA-A** and **MMR-TRA-B**, the Project's impacts associated with increased hazards due to a geometric design features would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Inadequate Emergency Access*: (Construction) As discussed more fully in Section 3.17, Transportation, of the Draft EIR, there would be a significant impact during Project construction associated with inadequate emergency access. Project construction would entail temporary roadway closures associated with Project construction. Designated disaster routes would also experience temporary closures associated with Project construction, requiring detours. To minimize impacts to a less-than-significant level, Mitigation Measures **MM-TRA-B** and **MM-TRA-C** would be implemented.

References. Section 3.17, Transportation, of the Draft EIR, pages 3.17-45 through 3.17-66; Appendix N, Transportation Appendices, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

6.8.3 Mitigation Measures

MM-TRA-B: Construction Traffic Management Plan (see above).

MM-TRA-C: Temporary Disaster Route Plan (see above).

Finding. The potential impacts related to Transportation described above, would be mitigated by requiring compliance with a Construction Traffic Management Plan and a Temporary Disaster Route Plan. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measures **MM-TRA-B** and **MM-TRA-C**, the Project's impacts associated with inadequate emergency access would be reduced to less-than-significant levels. For this impact, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.9 TRIBAL CULTURAL RESOURCES

As discussed in Section 3.18, Tribal Cultural Resources, of the Draft EIR, the Project would result in potentially significant impacts related to tribal cultural resources with respect to the following significance thresholds:

- Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, in in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

- Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Threshold. *Listed or Eligible for Listing in the California Register of Historical Resources*: (Construction) As discussed in Section 3.18, Tribal Cultural Resources, of the EIR, archival research for the Area of Direct Impacts for archaeological resources and within a 1/8-mile radius of the Area of Direct Impacts was conducted and resulted in the identification of one multi-component (prehistoric and historic) site, Resource 19-001575. The site was determined eligible for the NRHP, is considered eligible for the CRHR, and is possibly considered a TCR. Construction of the vertical circulation elements for the proposed Alameda Station in the area of the planned LAUS Forecourt would require ground-disturbing activities of up to 10 feet within the resource boundaries. As such, impacts could be potentially significant if unknown TCR are identified during construction. To minimize the potential impacts to tribal cultural resources

associated with the construction of the Project, Mitigation Measure **MM-CUL-D** described below, would be implemented.

References. Section 3.18, Tribal Cultural Resources, of the Draft EIR, pages 3.18-14 through 3.18-15.

6.9.1 Mitigation Measure

MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt (see above).

Finding. With the implementation of Mitigation Measure **MM-CUL-D**, impacts related to tribal cultural resources would be reduced to a less than significant level. For the reasons stated above and as set forth in the Draft EIR, Metro finds that these impacts related to tribal cultural resources would be reduced to less-than-significant levels. For these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Resource Determined Significant by the Lead Agency*: (Construction) As discussed in Section 3.18, Tribal Cultural Resources, Metro contacted representatives of eight tribes with a letter invitation for consultation, as required by AB 52. Metro received a response from the Gabrielino Tongva Indians of California Tribal Council and consulted with two tribal representatives from the Gabrieleno Band of Mission Indians - Kizh Nation. Tribal representatives emphasized that tribal cultural resources could easily be discovered through excavation. Ground-disturbing activities have the potential to reveal additional unidentified subsurface deposits of prehistoric and historic-age, and Native American burials. If previously unidentified archaeological resources, including tribal cultural resources, are encountered during construction, the possibility exists that those resources could be disturbed or damaged during construction, resulting in a potentially significant impact. To minimize the potential impacts to tribal cultural resources associated with the construction of the Project, Mitigation Measures **MM-TCR-A, MM-CUL-A**, and **MM-CUL-D***,* described below, would be implemented.

References. Section 3.18, Tribal Cultural Resources, of the Draft EIR, pages 3.18-15 through 3.18-17.

6.9.2 Mitigation Measure

MM-TCR-A: Native American Monitor. Because of the potential to encounter tribal cultural resources, a Native American monitor shall be retained to monitor project-related, ground-disturbing construction activities (e.g., boring, grading, excavation, drilling, trenching) that occur after existing pavement and structures are removed at the location of the Alameda Station. If cultural resources are encountered elsewhere along the alignment during construction that, in the opinion of the archaeological Principal Investigator (as defined in 32 CFR Section 767.8), are likely of Native American origin, then Native American monitoring may be extended to include the area of the find. The Principal Investigator will make the recommendation to the Project Sponsor and Metro if it seems the Native American monitoring should be extended. The appropriate Native American monitor shall be selected based on ongoing coordination with consulting tribes and shall be identified in the CRMMP.

The CRMMP is described in Mitigation Measure CUL A. Specifically, the CRMMP and Native American monitoring would be applicable to ground disturbance activities extending into native soils at the location of the Alameda Station and, if cultural resources are encountered elsewhere along the alignment during construction that, in the opinion of the archaeological Principal Investigator, are likely of Native American origin. Monitoring procedures and the role and responsibilities of the Native American monitor shall be outlined in the CRMMP. In the event the Native American monitor identifies cultural or archeological resources, the monitor shall be given the authority to temporarily halt construction (if safe) within 50 feet (15 meters) of the discovery to investigate the find and contact the archaeological Principal Investigator. The Native American monitor and consulting tribe(s) shall be provided an opportunity to participate in the documentation and evaluation of the find. If a data recovery plan is prepared, the consulting tribe(s) shall be provided an opportunity to review and provide input on the plan.

MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan (see above).

MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt (see above).

Finding. With the implementation of Mitigation Measures **MM-TCR-A, MM-CUL-A,** and **MM-CUL-D**, impacts related to tribal cultural resources would be reduced to a less than significant level. For the reasons stated above and as set forth in the EIR, Metro finds that these impacts related to tribal cultural resources would be reduced to less-than-significant levels. For these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.10 UTILITIES AND SERVICE SYSTEMS

As discussed in Section 3.19, Utilities and Service Systems, of the Draft EIR, the Project would result in potentially significant impacts related to utilities and service systems with respect to the following significance thresholds:

- Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

- Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Compliance with federal, state, and local management and reduction statutes and regulations related to solid waste?

Threshold. *Relocation or Construction of New Facilities*: (Construction) As discussed more fully in Section 3.19, Utilities and Service Systems, of the Draft EIR, there would be potentially significant impacts associated with the required relocations of existing utilities during Project construction. Construction of the Project would require relocations of existing utilities, which would

be coordinated with the utility providers and conducted in compliance with the applicable State and local codes and regulations. The environmental impacts associated with the relocations of these utilities as part of the Project would not result in any physical environmental effects beyond those identified in other sections of the Draft EIR. In addition, prior to beginning construction, it would be necessary to relocate, modify, or protect in place all utilities and below-grade structures that would conflict with excavations for street level and underground structures. Shallow utilities that would interfere with excavation work, such as maintenance holes or pull boxes, would be modified and moved away from the construction area. Travel lanes would need to be temporarily occupied during utility relocation for approximately two to three blocks at a time. The relocations of existing utilities may cause a significant impact related to interruption of services for the surrounding area. To minimize the potential interference with existing utilities associated with the construction of the Project, Mitigation Measure **MM-USS-A**, described below, would be implemented.

References. Section 3.19, Utilities and Service Systems, of the Draft EIR, pages 3.19-18 through 3.19-21; Section 5.0, Corrections and Additions, of the Final EIR.

6.10.1 Mitigation Measure

MM-USS-A: **Development of a Utility Relocation Plan.** Before the start of construction-related activities, including the relocation of utilities, the Project Sponsor shall coordinate with the Los Angeles Department of Water & Power, the Los Angeles Sanitation & Environment Department, the Southern California Gas Company, and Metro to prepare a Utility Relocation Plan. The Project Sponsor shall also coordinate with the utility companies to minimize impacts to services throughout the Project and obtain their approval of the Utility Relocation Plan. The Utility Relocation Plan shall be prepared, reviewed, and approved by a licensed civil engineer and, at a minimum, include the following:

- Plans that identify the utility infrastructure elements, including access for utility providers and easements, as applicable, that require relocation as a result of the proposed Project;
- Safety measures to avoid any human health hazards or environmental hazards associated with capping and abandoning some utility infrastructure, such as natural gas lines or sewer lines; and
- Timing for completion of the utility relocation, which shall be scheduled to minimize disruption to the utility companies and their customers.

Finding. The potential impacts related to Utilities and Service Systems described above would be mitigated by requiring compliance with the Utility Relocation Plan. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measure **MM-USS-A**, the Project's impacts associated with relocation and/or construction of new or expanded utilities would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Threshold. *Solid Waste*: (Construction) As discussed more fully in Section 3.19, Utilities and Service Systems, of the Draft EIR, there would be potentially significant impacts associated with the generation of construction waste from building demolition (1201 North Broadway), site clearing, removal of asphalt, and excavation. It is estimated that approximately 78,500 cubic yards of demolition debris would be generated, of which approximately 62,600 cubic yards would be soil, which is anticipated to not go to landfills. Excavated soil and land clearing debris would be sold and/or reused or recycled for backfill, as the majority of the soil is anticipated to be uncontaminated. However, there is the potential to encounter contaminated soil during construction activities. To mitigate these impacts to a less-than-significant level, Mitigation Measure **MM-HAZ-A**, described above, would be implemented.

References. Section 3.19, Utilities and Service Systems, of the Draft EIR, page 3.19-25; Section 5.0, Corrections and Additions, of the Final EIR.

6.10.2 Mitigation Measure

MM-HAZ-A: Prepare a Soil and Groundwater Management Plan (see above).

Finding. The potential impacts related to Utilities and Service Systems described above would be mitigated by requiring compliance with the Soil and Groundwater Management Plan. For the reasons set out above and in the EIR, Metro finds that, through implementation of Mitigation Measure **MM-HAZ-A**, the Project's solid waste impacts would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

7. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

Metro finds that, based upon substantial evidence in the record, as discussed below, the following impacts associated with the Project are less than significant, and no mitigation is required.

7.1 AESTHETICS

As discussed in Section 3.1, Aesthetics, of the Draft EIR, the Project would result in less-than-significant impacts related to aesthetics with respect to the following significance thresholds:

- Would the Project have a substantial adverse effect on a scenic vista?
- In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?
- Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Threshold. *Scenic Vista*: (Construction and Operations) As discussed in Section 3.1, Aesthetics, of the Draft EIR, while the Project provides views that are scenic to certain viewers, there are no designated scenic vistas present in the area of potential impact. However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. The Project would not significantly block scenic or panoramic views. The simulated views of the Project as shown in KOPs illustrate that views considered to be scenic locally would not be substantially impacted. In addition, views from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views. Changes to views during the construction phase would be noticeable; however, because construction activities are temporary in nature, construction activities would not result in a substantial adverse effect on a scenic vista and construction of the Project would not substantially affect designated scenic vistas or views of other prominent visual resources, and impacts would be less than significant. Operation of the Project would represent a change in views compared to existing conditions. However, the Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views. As such, construction and operation of the Project would not substantially affect scenic vistas or other panoramic views, and impacts would be less than significant.

References. Section 3.1, Aesthetics, of the Draft EIR, pages 3.1-33 through 3.1-35; Appendix C, Visual Impact Assessment, of the Draft EIR; Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, Section 5.0, Corrections and Additions, of the Final EIR.

7.1.1 Mitigation Measures

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the Draft EIR, Metro finds that these aesthetic impacts related to scenic vistas would be less than significant.

Threshold. *Public Views and Scenic Quality*: (Construction and Operations) Since the Project is in an urbanized area, the Project was analyzed for its potential to conflict with applicable zoning and other regulations governing scenic quality, in accordance with State CEQA Guidelines Appendix G. Construction of the Project would represent a temporary change in the visual quality and character of area of potential impact; however, construction impacts with respect to conflicting with regulations that govern scenic quality would be less than significant. The Project would be consistent with applicable zoning and other regulations governing scenic quality. As a result, the operation of the Project would have less than significant impacts related to visual character and quality.

References. Section 3.1, Aesthetics, of the Draft EIR, pages 3.1-36 through 3.1-52; Appendix C, Visual Impact Assessment, of the Draft EIR; Appendix H.1, Memo Regarding Preparation of View

Simulations, of the Final EIR, Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, Section 5.0, Corrections and Additions, of the Final EIR.

7.1.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these aesthetic impacts related to public views and scenic quality would be less than significant.

Threshold. *Light and Glare*: (Construction and Operations) Construction would not significantly increase the ambient light levels in the vicinity because construction duration would be short and temporary, would be confined to localized sites, and would not constitute a substantial source of light or glare. Additionally, the incorporation of Project Design Feature AES-PDF-A would moderate and reduce luminance for building and signage lighting. Construction impacts related to light and glare would be less than significant. Any shading that would occur as a result of construction activities would be temporary and intermittent for an approximately 25-month period. Thus, the potential for construction activities to result in shading and shadows would be minimal; impacts from construction would be less than significant. Project operations would not create a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area, and would comply with applicable City regulations related to light and glare. Therefore, impacts would be less than significant. Similarly, impacts related to shading would be less than significant.

References. Section 3.1, Aesthetics, of the Draft EIR, pages 3.1-52 through 3.1-56; Appendix C, Lighting Study, of the Draft EIR; Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, Section 5.0, Corrections and Additions, of the Final EIR.

7.1.3 Project Design Feature

AES-PDF-A: Project Lighting. The Project would also include the following Project Design Features related to lighting:

- Building Lighting will not exceed 60 watts.
- Building Lighting outdoor luminaires will not exceed 6200 initial lumens.
- Sign Lighting luminance will not exceed 10,000 candelas per m2 (cd/m2) during the day from after sunrise until 45 minutes prior to sunset. Sign Lighting will not exceed 300 cd/m2 at night from sunset until 45 minutes prior to sunrise.
- Sign Lighting luminance shall transition smoothly from daytime luminance to nighttime luminance and vice versa.
- Illuminated signs that have the potential to exceed 300 cd/m2 will include an electronic control mechanism to reduce sign luminance to 300 cd/m2 at any time when ambient sunlight is less than 100 footcandles (fc).

7.1.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these aesthetic impacts related to light, glare, and shade would be less than significant.

7.2 AGRICULTURE AND FORESTRY RESOURCES

As discussed in Section 3.2, Agriculture and Forestry Resources, of the Draft EIR, the Project would result in less-than-significant impacts related to agriculture and forestry resources with respect to the following significance thresholds:

- Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Threshold. *Agricultural Zoning*: (Construction and Operations) The Project would not conflict with a Williamson Act contract, as, there are no Williamson Act contracts within Los Angeles County. The Stadium Tower site and the Dodger Stadium Station site are both zoned A1; however, neither site contains agricultural uses. Therefore, construction and operation of the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. The impact would be less than significant.

References. Section 3.2, Agriculture and Forestry Resources, of the Draft EIR, page 3.2-6.

7.2.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these agriculture and forestry resources impacts related to zoning and Williamson Act contracts would be less than significant.

7.3 AIR QUALITY

As discussed in Section 3.3, Air Quality, of the Draft EIR, the Project would result in less-than-significant impacts related to air quality with respect to the following significance thresholds:

- Would the Project conflict with or obstruct implementation of the applicable air quality plan?

- Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

- Would the Project expose sensitive receptors to substantial pollutant concentrations?

- Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Threshold. *Air Quality Plan*: (Construction and Operations) Neither construction nor operation of the Project would impair or delay the region's ability to achieve the SCAQMD's goals for attainment of air quality standards. Therefore, impacts related to conflict with or obstruction of implementation of the applicable air quality plan would be less than significant. Additionally, the incorporation of Project Design Feature AIR-PDF-A shall require all off-road diesel-powered construction equipment greater than 50 horse power shall meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA.

References. Section 3.3, Air Quality, of the Draft EIR, pages 3.3-20 through 3.3-21; Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR.

7.3.1 Project Design Feature

AIR-PDF-A All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA.

7.3.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these air quality impacts related air quality plans would be less than significant.

Threshold. *Cumulatively Considerable Net Increase of Any Criteria Pollutant*: (Construction and Operations) As discussed in detail in Section 3.3, Air Quality, of the Draft EIR, estimated maximum mass daily emissions for Project construction and operations are less than the SCAQMD mass daily significance thresholds for all criteria pollutants and this impact would be less than significant. To provide additional environmental benefits related to criteria pollutants, the Project would incorporate AIR-PDF-A**.**

References. Section 3.3, Air Quality, of the Draft EIR, pages 3.3-21 through 3.3-24; Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR.

7.3.3 Project Design Feature

AIR-PDF-A (see above)

7.3.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these air quality impacts related to increase of any cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment would be less than significant.

Threshold. *Sensitive Receptors*: (Construction and Operations) As discussed in detail in Section 3.3, Air Quality, of the Draft EIR, during construction the Project would not expose sensitive receptors to substantial concentrations of NO_X, CO, PM_{10}, and $PM_{2.5}$. Similarly, the Project would not expose sensitive receptors to substantial concentrations of pollutants during operations because the Project does not include any land uses or operational emissions that would materially impact ambient air quality during operations, consistent with SCAQMD's methodology. Impacts would be less than significant. To provide additional environmental benefits related to sensitive receptors, the Project would incorporate AIR-PDF-A.

References. Section 3.3, Air Quality, of the Draft EIR, pages 3.3-25 through 3.3-27; Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR.

7.3.5 Project Design Feature

AIR-PDF-A (see above)

7.3.6 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these air quality impacts related to sensitive receptors would be less than significant.

Threshold. *Other Emissions*: (Construction and Operations) As discussed in Section 3.3, Air Quality, of the Draft EIR, the Project would not include any uses identified by the SCAQMD as being associated with odors and is not expected to result in significant odors. Thus, the Project would not result in odors adversely affecting a substantial number of people. Impacts would be less than significant. To provide additional environmental benefits related to other emissions, the Project would incorporate **AIR-PDF-A.**

References. Section 3.3, Air Quality, of the Draft EIR, page 3.3-27; Appendix D, Air Quality/Health Risk Assessment Technical Report, of the Draft EIR.

7.3.7 Project Design Feature

AIR-PDF-A (see above)

7.3.8 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these air quality impacts associated with other emissions would be less than significant.

7.4 BIOLOGICAL RESOURCES

As discussed in Section 3.4, Biological Resources, of the Draft EIR, the Project would result in less-than-significant impacts related to biological resources with respect to the following significance thresholds:

- Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

- Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Threshold. *Candidate, Sensitive, or Special Status Species*: (Operations) As discussed in Section 3.4, Biological Resources, of the Draft EIR, the Biological Survey Area ("BSA) does not provide suitable habitat for special-status plant species, and migration of special-status birds and raptors is not expected to be concentrated in the BSA. Operation may include noise and increased human activity, especially near station locations and queuing areas. However, the BSA does not include suitable habitat for special-status plant species. Given the heavily urbanized nature of the BSA and limited amount of suitable foraging and nesting habitat, special-status birds and raptors are not expected to occur in the BSA, except potentially as transient migrants. Migration is not expected to be concentrated in the BSA. In addition, the risk of avian collisions with the cables or components of the Project is expected to be less than significant. Design features of the proposed Project (e.g., the lack of shield wires, the inclusion of slack carriers, presence of moving gondola cabins, and vinyl window film) are likely to reduce the risk of avian collisions in comparison to transmission lines. Therefore, operation of the Project would have a less than significant impact on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

References. Section 3.4, Biological Resources, of the Draft EIR, pages 3.4-18 through 3.4-19; Appendix E, Biological Resources Assessment, of the Draft EIR; Appendix G, Supplemental Biological Resources Report, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.4.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these biological resources impacts would be less than significant.

Threshold. *Wildlife Movement/Wildlife Corridors/Wildlife Nursery Sites*: (Operations) Natural vegetation communities or waterways are not present in the biological study area and birds are not expected to concentrate in the area due to lack of suitable habitat. Therefore, operation of the Project would result in a less than significant impact related to substantially interfering with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites. In

addition, the risk of avian collisions with the cables or components of the Project is expected to be less than significant. Design features of the proposed Project (e.g., the lack of shield wires, the inclusion of slack carriers, presence of moving gondola cabins, and vinyl window film) are likely to reduce the risk of avian collisions in comparison to transmission lines. Further, the proposed Project towers and cables are below the heights where most avian collision impacts occur, as most avian flight during migration occurs at thousands of feet agl, whereas the proposed Project component heights are all below 200 feet agl. In order to provide additional environmental benefits, the Project would also incorporate BIO-PDF-C, which would require cabin windows to be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight.

References. Section 3.4, Biological Resources, of the Draft EIR, page 3.4-21; Appendix E, Biological Resources Assessment, of the Draft EIR; Appendix G, Supplemental Biological Resources Report, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.4.2 Project Design Feature

BIO-PDF-C: Cabin Window Features. The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces.

7.4.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these biological resources impacts related to wildlife movement, corridors, and nursery sites would be less than significant.

Threshold. *Conflict with Local Policies or Ordinances Protecting Biological Resources:* (Construction) A tree inventory report was prepared for the Project alignment, including the areas along the alignment between Project components. Trees occurring along the Project alignment were inventoried for species, size, and location. Of the 260 trees identified in the tree inventory report, 250 are proposed for removal and 10 would be preserved. Of the 250 trees proposed for removal, 141 are under the jurisdiction of the City of Los Angeles, including one protected tree, 106 significant trees, and 34 trees in the City ROW. The other 109 trees proposed for removal are under the jurisdiction of an entity other than the City, including 75 trees within the California Department of Parks and Recreation's jurisdiction. The Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located. Therefore, construction of the Project would not result in a conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Accordingly, construction impacts would be less than significant. Nevertheless, in order to provide additional environmental benefits, the Project would also incorporate BIO-PDF-A, BIO-PDF-E, and BIO-PDF-F. BIO-PDF-A would require that the Project establish a Tree Protection Zone to protect trees during construction. BIO-PDF-E would require that trees scheduled for removal resulting from the Project be inspected for contagious tree diseases. BIO-PDF-F would require

that the Project adhere to applicable tree replacement ratios under the City of Los Angeles, California Department of Parks and Recreation, and Caltrans.

References. Section 3.4, Biological Resources, of the Draft EIR, pages 3.4-22 through 3.4-24; Appendix E, Biological Resources Assessment, of the Draft EIR; Appendix G, Supplemental Biological Resources Report, of the Final EIR; Appendix K.1, Updated Tree Report, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.4.4 Project Design Features

BIO-PDF-A: (see above).

BIO-PDF-E: **Tree Disease Management** (see above).

BIO-PDF-F: (see above).

7.4.5 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that impacts related to a conflict with local policies or ordinances protecting biological resources would be less than significant.

7.5 CULTURAL RESOURCES

As discussed in Section 3.5, Cultural Resources, of the Draft EIR, the Project would result in less-than-significant impacts related to cultural resources with respect to the following significance thresholds:

- Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Threshold. *Historical Resources*: (Operations) Operation of the Project would result in direct impacts and indirect impacts to historical resources. Direct impacts include physical components located within historical resource boundaries. Indirect impacts include visual, auditory, and atmospheric changes to the setting of identified historical resources. However, all impacts would be less than significant as the historic resources would continue to convey their individual significance and their existing physical integrity and character-defining features would remain intact.

References. Section 3.5, Cultural Resources, of the Draft EIR, pages 3.5-49 through 3.5-56; Appendix G, Historical Resource Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.5.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these cultural resources impacts to historical resources would be less than significant.

7.6 ENERGY

As discussed in Section 3.6, Energy, of the Draft EIR, the Project would result in less-than-significant impacts related to energy with respect to the following significance thresholds:

- Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Threshold. *Consumption of Energy Resources - Electricity*: (Construction and Operations) Construction and operation of the Project would require electricity; however, electricity use would have a negligible effect on LADWP peak demand. Therefore, Project construction and operation would have a less than significant impact related to wasteful, inefficient, or unnecessary consumption of electricity.

Consumption of Energy Resources - Fuel: (Construction and Operations) Fuel use during construction would be considered negligible when evaluated on a local and regional scale and would not adversely impact local or regional energy supplies or require additional capacity. Operation of the Project would decrease the number of people traveling to Dodger Stadium and the surrounding area in passenger vehicles and increase the number of people using public transit, reducing fuel use. Therefore, Project construction and operation would have a less than significant impact related to wasteful, inefficient, or unnecessary consumption of fuel.

Consumption of Energy Resources - Natural Gas: (Construction) Construction of the Project would involve the use of transportation fuel, including natural gas use in off-road construction equipment, haul trucks, vendor trucks, construction worker vehicles, and worker shuttles. Natural gas use during construction would be considered negligible. Therefore, Project construction and operation would have a less than significant impact related to wasteful, inefficient, or unnecessary consumption of natural gas.

References. Section 3.6, Energy, of the Draft EIR, pages 3.6-15 through 3.6-20; Appendix H, Energy Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.6.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these energy impacts associated with energy consumption would be less than significant.

Threshold. *Conflict with Renewable Energy or Energy Efficiency Plan*: (Construction and Operations) Because the Project would result in a net decrease of GHG emissions and fuel usage, the Project is consistent with applicable renewable energy and energy efficiency plans, policies, and regulations. Therefore, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The impact would be less than significant.

References. Section 3.6, Energy, of the Draft EIR, pages 3.6-20 through 3.6-21; Appendix H, Energy Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.6.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these energy impacts associated with energy plans would be less than significant.

7.7 GEOLOGY AND SOILS

As discussed in Section 3.7, Geology and Soils, of the Draft EIR, the Project would result in less-than-significant impacts related to geology and soils with respect to the following significance thresholds:

- Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

- Would the Project result in substantial soil erosion or the loss of topsoil?

- Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the current CBC, creating substantial direct or indirect risks to life or property?

Threshold. *Earthquake Fault Rupture*: (Operations) As discussed in Section 3.7, Geology and Soils, of the Draft EIR, although the Project would be in the seismically active region of southern California, it would not be in a State of California Earthquake Fault Zone (Alquist-Priolo Earthquake Fault Zone). The fault closest to the Project site is the Elysian Park fault. According to the U.S. Geological Survey Quaternary fault and fold database, the location of the Upper

Elysian Park fault is inferred to cross under the alignment. The Upper Elysian Park fault is a north-to-northeast–dipping fault that underlies the northern Los Angeles basin from Griffith Park to Garvey Reservoir. However, the Elysian Park fault is a blind thrust fault, which means it is not capable of surface fault rupture, and therefore is not subject to the conditions of the Alquist-Priolo Act. The Elysian Park thrust fault is considered to be seismogenic (capable of generating earthquakes) from a depth of approximately 2 miles below ground surface in the south-southwest, to approximately 10 miles below ground surface in the north-northeast. Accordingly, impacts related to rupture of a known earthquake fault would be less than significant. Further, the Project would be designed and constructed in accordance with applicable building codes, and therefore would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic related ground failure, including liquefaction; or landslides, and the impact would be less than significant.

References. Section 3.7, Geology and Soils, of the Draft EIR, page 3.7-15; Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR; Appendix F, Memo on Structural Engineering, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.7.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these geology and soils impacts associated with earthquake fault rupture would be less than significant.

Threshold. *Soil Erosion*: (Construction and Operations) As discussed in Section 3.7, Geology and Soils, of the Draft EIR, the Stadium Tower is on vegetated hillside and would have a relatively small footprint (approximately 870 square feet). During construction, it is anticipated that an approximately 23,500-square-foot area around the tower base would be used for construction support activities. The proposed Dodger Stadium Station would have a footprint of approximately 27,770 square feet at ground level and approximately 87,000 square feet would be used for construction support space. The Dodger Stadium Station would be partially situated on an existing parking lot, and partially over the existing vegetated slope. The potential for impacts relative to loss of topsoil is extremely low due to the urban nature of the Project area, the small foundation footprint of the proposed Stadium Tower, and the portion of the Dodger Stadium Station that extends onto a currently vegetated slope.

Project construction would involve general earthwork to prepare the foundations, which would temporarily expose bare soil, which would increase the potential for erosion. Additionally, exposed or stockpiled soils would also be susceptible to erosion. Sediments resulting from erosion might accumulate, blocking storm drain inlets and causing downstream sedimentation. However, the Project would be required to comply with all applicable federal, State, regional, and local regulations during construction activities and construction-related impacts due to soil erosion and loss of topsoil would be less than significant during Project construction. Once the Project is constructed, no substantial surface area would be exposed that could be subjected to accelerated

soil erosion during operations and impacts related to substantial soil erosion or the loss of topsoil would be less than significant.

References. Section 3.7, Geology and Soils, of the Draft EIR, pages 3.7-15 through 3.7-16; Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR.

7.7.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these geology and soils impacts associated with soil erosion would be less than significant.

Threshold. *Off-site Landslide, Lateral Spreading, Subsidence, Liquefaction or Collapse*: (Operations) As discussed in detail in Section 3.7, Geology and Soils, of the Draft EIR, under the Project, the Alameda Station, Alameda Tower, Alpine Tower, Chinatown/State Park Station, and Broadway Junction would be in an area mapped as potentially subject to liquefaction. However, on completion of construction, the Project would have complied with applicable standards, requirements, and building codes related to subsidence, liquefaction, and settlement. With the incorporation of the recommendations presented in the final geotechnical investigation per Mitigation Measure **MM-GEO-A** and the adherence to the Operational Emergency Plan the operational impacts related to subsidence, liquefaction, and settlement would be less than significant.

References. Section 3.7, Geology and Soils, of the Draft EIR, pages 3.7-16 through 3.7-17; Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR; Appendix F, Memo on Structural Engineering, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.7.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these geology and soils impacts associated with on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse would be less than significant.

Threshold. *Expansive Soil.* (Operations) The Project would be in an area with the potential for expansive soil and soil corrosion. However, on completion of construction, the Project would have complied with applicable standards, requirements, and building codes and implemented Mitigation Measure **MM-GEO-A** to reduce potential impacts during construction. Accordingly, impacts related to expansive soil and/or soil corrosion would be less than significant.

References. Section 3.7, Geology and Soils, of the Draft EIR, page 3.7-18; Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR;

Appendix F, Memo on Structural Engineering, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.7.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these geology and soils impacts associated with expansive soils would be less than significant; Section 5.0, Corrections and Additions, of the Final EIR.

7.8 GREENHOUSE GAS EMISSIONS

As discussed in Section 3.8, Greenhouse Gas Emissions, of the Draft EIR, the Project would result in less-than-significant impacts related to greenhouse gas emissions with respect to the following significance thresholds:

- Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the Project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Threshold. *Greenhouse Gas Emissions.* (Construction and Operations) As discussed in Section 3.8, Greenhouse Gas Emissions, of the Draft EIR, the total GHG emissions from Project construction are 3,792 MT CO2e, which include construction electricity usage and construction off-road equipment and mobile trips. When amortized over a period of 30 years, the emission estimates for the Project become 127 MT CO2e per year. Consistent with SCAQMD recognized methodologies, amortized construction GHG emissions are included in the Project GHG operational emissions and evaluated below as part of the Project's GHG emissions. The Project would reduce GHG emissions compared to the baseline conditions by 3,482 MT CO2e/yr at the build-out year (2026), and a decrease from existing GHG conditions by 6,375 MT CO2e/yr at the horizon year (2042). In accordance with CEQA Section 15064.4(b), the Project would not result in an incremental contribution of GHG emissions compared to existing conditions and would reduce GHG emissions compared to existing conditions. Therefore, impacts related to GHG emissions from construction and operation of the Project would be less than significant. Further, as discussed in GHG-PDF-A, the Project has committed to use electricity supplied from LADWP's Green Power Program, such that electrical power for the operation from the Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources.

References. Section 3.8, Greenhouse Gas Emissions, of the Draft EIR, pages 3.8-16 through 3.8-18; Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.8.1 Project Design Features

GHG-PDF-A: **Green Power**. Electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources. The proposed Project shall achieve this through applying to LADWP's Green Power Program or other available LADWP (or equivalent) programs that provide renewable electricity.

7.8.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these greenhouse gas emissions impacts would be less than significant.

Threshold. *Greenhouse Gas Plan, Policy, or Regulation*. (Construction and Operations) As discussed in Section 3.8, Greenhouse Gas Emissions, of the Draft EIR, the Project would not impede or conflict with applicable GHG reduction plans, policies, or regulations. Given the Project's reduction in GHG emissions compared to existing conditions in the buildout year (2026) and horizon year (2042), as well as the Project using renewable electricity and providing an innovative alternative mode of transit, the Project is consistent with California's GHG reduction target for the year 2030, as codified by SB 32, and California's post-2030 climate goals. Accordingly, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions, and the impact would be less than significant.

References. Section 3.8, Greenhouse Gas Emissions, of the Draft EIR, pages 3.8-18 through 3.8-19; Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.8.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these greenhouse gas emission impacts associated with plans, policies, and regulations would be less than significant.

7.9 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, the Project would result in less-than-significant impacts related to hazards and hazardous materials with respect to the following significance thresholds:

- Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

- Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials to the environment?

- Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Threshold. *Routine Transport, Use, or Disposal of Hazardous Materials:* (Operations) As discussed in detail in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, it is anticipated that operation and maintenance of the Project would include use of limited quantities of hazardous materials. Compliance with applicable federal, State, and local requirements (including potential development of a Hazardous Materials Business Plan) concerning the handling, storage and disposal of hazardous waste would reduce the potential to release contaminants. No activities are proposed that would result in the use or discharge of unregulated hazardous materials. The Project would transport, handle and store, and dispose of all materials in compliance with all codes, standards, and regulations. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during operation would be less than significant.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, pages 3.9-24 through 3.9-25; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Appendix M, Potential Excavated Material Disposal Analysis, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.9.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hazards and hazardous materials impacts related to routine transport, use or disposal of hazardous materials would be less than significant.

Threshold. *Release of Hazardous Materials*: (Operations) As discussed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, it is anticipated that operation and maintenance of the Project would include limited quantities of hazardous materials. No activities are proposed that would result in the use or discharge of unregulated hazardous materials. Storage and disposal of hazardous materials and waste would be conducted in accordance with all regulatory requirements. The Project is located in part in the Methane Zone. With adherence to existing regulations, impacts due to methane gas during operation would be less than significant. Therefore, operational impacts related to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant for the Project.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, page 3.9-27; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.9.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hazards and hazardous materials impacts associated with release of hazardous materials would be less than significant.

Threshold. *Hazardous Materials within One-Quarter Mile of a School*: (Operations) It is anticipated that operation and maintenance of the Project would include the use of limited quantities of hazardous materials, such as oils, paints, solvents, lubricants, and cleaners. No activities are proposed that would result in the use or discharge of unregulated hazardous materials. The Project would handle and store all materials in compliance with all codes, standards, and regulations. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, page 3.9-28; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.9.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hazards and hazardous materials impacts associated with hazardous materials within one-quarter mile of a school would be less than significant.

Threshold. *Emergency Response Plan or Emergency Evacuation Plan*: (Operations) As discussed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, daily operations, and annual maintenance activities of the Project, would not impair the City's Emergency Operations Plan or Local All-Hazards Mitigation Plan, or the County's Operational Area Emergency Response Plan. Therefore, operation of the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and the impact would be less than significant.

References. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, page 3.9-46; Appendix K, Phase I Environmental Site Assessment, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.9.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hazards and hazardous materials impacts associated with emergency response or evacuation plans would be less than significant.

7.10 HYDROLOGY AND WATER QUALITY

As discussed in Section 3.10, Hydrology and Water Quality, of the Draft EIR, the Project would result in less-than-significant impacts related to hydrology and water quality with respect to the following significance thresholds:

- Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    i. result in substantial erosion or siltation on- or off-site;
    ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
    iii. create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    iv. impede or redirect flood flows?
- Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Threshold. *Surface and Groundwater Quality*: (Construction and Operations) As discussed in Section 3.10, Hydrology and Water Quality, of the Draft EIR, based on groundwater depths, none of the proposed excavations for foundations are anticipated to encounter groundwater; however, removal of nuisance water that seeps into boreholes during construction may be required for the pile installations at each of the components. A Soil and Groundwater Management Plan would be prepared to specify methods for handling and disposal in the event contaminated groundwater is encountered during construction. If dewatering is required, the treatment and disposal of the removed water would occur in accordance with the requirements of LARWQCB's WDRs for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Construction and equipment maintenance activities such as demolition of existing site structures and excavation for foundations would temporarily expose bare soil at each Project component, which would be at increased risk for erosion. Exposed or stockpiled soils would also be at increased risk for erosion. Sediments resulting from erosion might accumulate, blocking storm drain inlets and causing downstream sedimentation. Erosional sediments might be carried by stormwater runoff into storm drain inlets, which ultimately empty into the Los Angeles River. As part of the Project, the Sponsor would be required to comply with all applicable federal, State, regional, and local agency water quality protection laws and regulations, as well as commonly used industry standards. The Project Sponsor would be required to prepare and submit a construction SWPPP to the SWRCB prior to—and adhered to during—construction. With adherence to these laws, regulations, and permit requirements, impacts related to surface or groundwater quality during construction activities would be less than significant.

During operations, the Project would not result in a significant increase in impervious surfaces because most of the land surfaces in the Project study area are developed, and covered by existing impervious surfaces. The Project would require routine maintenance that would be performed by the system operator. Oil and grease used during Project operations and maintenance could contribute to water pollution if not properly stored or disposed. Maintenance activities associated with system operation, such as lubrication, would occur at each of the Project component locations, while maintenance of the cabins would occur at the subterranean maintenance facility proposed at the Dodger Stadium Station. Uncontrolled discharge of runoff carrying these potential pollutants could result in adverse effects to water quality in the Los Angeles River. The Project would comply with the City of Los Angeles Municipal Code and all other applicable regulations for all operational activities, including adherence to an approved LID Plan that would identify the BMPs for Project operations. With adherence to these existing laws and regulations, impacts related to surface or groundwater quality during operations would be less than significant.

References. Section 3.10, Hydrology and Water Quality, of the Draft EIR, pages 3.10-25 through 3.10-30; Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR.

7.10.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hydrology and water quality impacts associated with surface and groundwater quality would be less than significant.

Threshold. *Decrease in Groundwater Supplies or Interference with Groundwater Recharge:* (Construction) As discussed in Section 3.10, Hydrology and Water Quality, of the Draft EIR, the Project may require the removal of nuisance water that seeps into boreholes during construction. Nuisance water and seepage encountered during construction would be removed from the boreholes, containerized, and analyzed consistent with existing applicable regulations to determine the proper disposal method. However, volumes generated would not be expected to be significant, and would be limited to the constructed phase only. No large volumes of

groundwater would be extracted during construction that could decrease groundwater supplies. In addition, the Project would comply with all applicable federal, State, and local agency water quality protection laws and regulations, as well as commonly used industry standards. Due to the limited amount of nuisance seepage water anticipated to be encountered, and with adherence to existing regulations, potential impacts to groundwater supply and recharge during construction would be less than significant.

References. Section 3.10, Hydrology and Water Quality, of the Draft EIR, page 3.10-30; Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR.

7.10.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hydrology and water quality impacts associated with groundwater supplies and recharge would be less than significant.

Threshold. *Drainage Pattern*: (Construction and Operations) As discussed in Section 3.10, Hydrology and Water Quality, of the Draft EIR, construction activities would temporarily expose bare soil, which would be at increased risk for erosion. Exposed or stockpiled soils would also be at increased risk for erosion. In addition, trash, concrete waste, and petroleum products, including heavy equipment fuels, solvents, and lubricants, could contribute to water pollution. The use of construction equipment and other vehicles during Project construction could result in spills of oil, brake fluid, grease, antifreeze, or other vehicle-related fluids, which could contribute to water pollution. Improper handling, storage, or disposal of fuels and vehicle-related fluids or improper cleaning and maintenance of equipment could result in accidental spills and discharges, which could contribute to water pollution. The Project would be required to comply with all applicable federal, State, regional and local agency water quality protection laws and regulations, as well as commonly utilized industry standards. With adherence to these laws and regulations, impacts during construction related to substantial erosion or siltation, substantial increase in the rate or amount of surface runoff, creation of runoff that would exceed drainage system capacity or provide additional sources of polluted runoff, and impeding or redirecting flood flows would be less than significant.

Operation of the Project would not result in a substantial increase in impervious surfaces because most of the land surfaces in the Project study area are developed, and covered by existing impervious surfaces, including the footprints of Project components. the Project would be designed to incorporate several sustainability features and would be in compliance with the LID Handbook, as applicable. It would also comply with all applicable federal, State, regional, and local agency water quality protection laws and regulations, water quality control and/or sustainable groundwater management plans. With adherence to existing laws and regulations, the impact resulting from operation of the Project would be less than significant.

References. Section 3.10, Hydrology and Water Quality, of the Draft EIR, pages 3.10-31 through 3.10-34; Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR.

7.10.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hydrology and water quality impacts associated with drainage patterns would be less than significant.

Threshold. *Flooding*: (Construction and Operations) The Project would be constructed outside of the FEMA designated 100-year floodplain and would be located in an inland area that is not in close proximity to the ocean, so the risk of inundation by a tsunami is considered low. There are two standing bodies of water within one mile of the Project alignment, the Solano Reservoir and the Elysian Reservoir. Impacts from seiche at either facility are not expected. Therefore, the impacts associated with risk of release of pollutants due to Project inundation by flood, tsunami, or seiche would be less than significant.

References. Section 3.10, Hydrology and Water Quality, of the Draft EIR, pages 3.10-34 through 3.10-35; Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR.

7.10.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hydrology and water quality impacts would be less than significant.

Threshold. *Consistency with Water Plan*: (Construction and Operations) The Project would be required to comply with all applicable federal, State, regional, and local agency water quality protection laws and regulations, water quality control, and/or sustainable groundwater management plans. The Project will have a construction SWPPP, which must be submitted to the SWRCB prior to construction, and adhered to during construction. The construction SWPPP would identify the BMPs that would be in place prior to the start of construction activities and during construction. Through adherence to these laws and regulations, and implementation of BMPs, impacts related to implementation of a water quality control plan or sustainable groundwater management plan during construction would be less than significant.

Similarly, during Project operations, the Sponsor would comply with all applicable federal, State, regional, and local agency water quality protection laws and regulations, water quality control and/or sustainable groundwater management plans. In addition, the Project would incorporate into its design an on-site drainage system that would meet regulatory requirements of the applicable plans for the protection of water resources, would be in compliance with the LID Handbook, and identify the BMPs for Project operations. With adherence to these laws and regulations, and groundwater management plans, impacts related to implementation of a water quality control plan or sustainable groundwater management plan during operations would be less than significant.

References. Section 3.10, Hydrology and Water Quality, of the Draft EIR, pages 3.10-35 through 3.10-38; Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR.

7.10.5 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these hydrology and water quality impacts would be less than significant.

7.11 LAND USE AND PLANNING

As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the Project would result in less-than-significant impacts related to land use and planning with respect to the following significance thresholds:

- Would the Project physically divide an established community?

Threshold. *Physically Divide an Established Community:* (Construction) Construction of the Project would require full road closures during construction hours along portions of Alameda Street, North Broadway, and Bishops Road, and partial lane closures on Alameda Street, Alpine Street and Spring Street. Established communities would not be physically divided during construction, and closures would be temporary, only occurring during the construction phase. Additionally, there would be a variety of options available for connections and access within the Project area, with Alameda Street, Alhambra Avenue, Alpine Street, Spring Street, and Broadway remaining partially open during different phases of construction. Other options including the planned Alameda Esplanade bike path and the provision of pedestrian detours during certain phases of construction would allow for continued pedestrian access within the Project area. These communities will remain accessible from other surrounding streets and these closures would not physically divide these communities. Construction impacts would therefore be less than significant.

References. Section 3.11, Land Use and Planning, of the Draft EIR, pages 3.11-22 to 3.11-36; Section 5.0, Corrections and Additions, of the Final EIR.

7.11.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these land use and planning impacts associated with dividing an established community would be less than significant.

7.12 NOISE

As discussed in Section 3.13, Noise, of the Draft EIR, the Project would result in less-than-significant impacts related to noise with respect to the following significance thresholds:

- Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Threshold. *Increased Ambient Noise Levels*: (Construction; Off-Site) As discussed in Section 3.13, Noise, of the Draft EIR, noise would be generated off site by construction related traffic traveling via off-site construction traffic routes. The noise impacts of construction trucks traveling on these construction traffic routes were analyzed using the Traffic Noise Model (TNM) to create a conceptual scenario representative of the Project area. Overall, estimated off-site construction traffic noise impacts would not exceed significance thresholds at the proposed off-site haul routes. Therefore, off-site construction traffic noise impacts would be less than significant.

References. Section 3.13, Noise, of the Draft EIR, pages 3.13-52 through 3.13-58; Appendix M, Noise and Vibration Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.12.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these noise impacts associated with off-site construction noise would be less than significant.

Threshold. *Increased Ambient Noise Levels*: (Operations) As discussed in Section 3.13, Noise, of the Draft EIR, an operational noise analysis was completed for a worst-case operational scenario (2042 Dodger Game Day). The analysis assumed the highest line speed, cabins per hour, and queueing numbers, and included nighttime operations, all of which contributed to this scenario resulting in the worst-case condition. The assumptions for the Dodger Game Day scenario using the 2042 horizon year were: maximum line speed (6.0 meters per second/19.7 feet per second), maximum cabins (156/hour), inclusion of nighttime operations, and maximum queueing (603 people). The analysis showed that no operational impacts would occur under the worst-case scenario and therefore the remaining operational scenarios, which result in less noise as a result of changes to line speed, cabins per hour, or queuing number, would also not result in significant noise impacts. The analysis also included potential impacts from cabin noise as the gondolas travel between and within the stations, towers, and junction. The analysis found that the gondola noise would be at least 10 dBA less than the existing nighttime noise level and therefore cabin noise would not contribute to the overall operational noise levels at any NSRs and impacts from gondola cabin noise would be less than significant. Project design feature NOI-PDF-A would further ensure that cabins would be designed such that they would generate noise levels of at least 10 dBA below the current background levels. The analysis also examined the cumulative operational noise from the stations, towers, and queuing and the cabins and determined that the cabin noise was not expected to result in a contribution to cumulative noise levels (i.e., noise from

the aerial gondola system and people) with implementation of project design feature NOI-PDF-A. Therefore, operational impacts would be less than significant.

References. Section 3.13, Noise, of the Draft EIR, pages 3.13-52 through 3.13-58; Appendix M, Noise and Vibration Technical Report, of the Draft EIR; Appendix L, 3S Sound Measurements Memo, of the Final EIR; Topical Response P, Gondola System Noise Modeling, in Section 6.0, Responses to Comments, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.12.2 Project Design Feature

NOI-PDF-A: Gondola Cabin Noise Control Features. The Project's gondola cabins shall include the following features:

1) Gondola cabins shall be designed with an interior-to-exterior noise reduction rating of no less than Sound Transmission Class (STC) 35.

2) If heating, ventilation, and air conditioning (HVAC) units are included in the gondola cabin design, they shall be designed with a sound power level of no more than 71 dBA.

7.12.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these noise impacts associated with operational noise would be less than significant.

Threshold. *Ground-borne Vibration or Noise*: (Operations) As discussed in Section 3.13, Noise, of the Draft EIR, none of the Project operations are anticipated to produce perceptible vibration beyond the Project footprint. Some of the equipment within the stations, towers, and junction, such as motors or cable guidance systems, may produce a small amount of vibration during normal operations that may be perceptible within the station or junction structure, but these components would be isolated and balanced as part of their basic design and maintenance for proper operation such that they would not produce perceptible vibration levels outside of the station or junction footprint. In addition, vertical circulation devices, such as escalators and elevators, would, similarly, not generate perceptible vibration levels beyond the Project footprint. In addition, ground-borne vibration attenuates rapidly as a function of distance from a vibration source. Therefore, operation of the Project would not increase the existing vibration levels in the immediate vicinity of the Project component sites, and as such, vibration impacts associated with the operation of the Project would be less than significant.

References. Section 3.13, Noise, of the Draft EIR, page 3.13-67; Appendix M, Noise and Vibration Technical Report, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.12.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these noise impacts associated with ground-borne vibration or noise would be less than significant.

7.13 POPULATION AND HOUSING

As discussed in Section 3.13.4 of the Draft EIR, the Project would result in less-than-significant impacts related to population and housing with respect to the following significance thresholds:

- Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Threshold. *Unplanned Population Growth*: (Construction and Operations) Given the temporary nature of construction industry jobs, the relatively large regional construction industry, and the total number of construction workers needed during any construction phase, it is likely that the labor force from within the region would be sufficient to complete the majority of Project construction without a substantial influx of new workers and their families. Any such relocation within the region would be minimal. Although specialized personnel, including ART manufacturer and cable specialists, would be on-site during construction phases involving the installation of the ART system and cable pulling, they are expected to use existing seasonal accommodations and leave once construction is completed. Accordingly, construction employment generated by the Project would not impact population in the heavily populated Los Angeles region. As a first/last mile transit connection to Dodger Stadium, construction of the Project would not induce substantial population growth either directly or indirectly. Impacts related to induced population growth during the construction of the Project would be less than significant.

No housing units are proposed as part of the Project and would not result in a direct population increase from construction of new homes. Employees are expected to be drawn from the local labor force and would not induce substantial unplanned population growth. The Project is not anticipated to stimulate development to a level inconsistent with applicable planned local land use designations. Operation of the Project would not induce substantial population growth, either directly or indirectly. Impacts related to induced population growth during operation of the Project would be less than significant.

References. Section 3.14, Population and Housing, of the Draft EIR, pages 3.14-12 through 3.14-15.

7.13.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these population and housing impacts associated with unplanned population growth would be less than significant.

Threshold. *Displacement and Replacement Housing*: (Construction and Operations) Construction of the Project would be temporary in duration. It is anticipated that construction workers would commute to the Project area and would not relocate their households permanently from other regions. During the later phases of Project construction, a limited number of ART manufacturer and cable specialists would be on-site during the phases of construction that involve the installation of the ART system and the cable pulling. However, these workforce personnel would use existing hotels, motels, and other seasonal accommodations in the Project site vicinity, and would be expected to leave once construction is completed. impacts related to displacing substantial numbers of existing people or housing would be less than significant during Project construction.

Following construction of the Project components, the Project would operate primarily over the public ROW, the Los Angeles State Historic Park, certain private properties, or on privately owned property consisting of an office building, a hillside, and the Dodger Stadium parking lot. Operation over private properties would not result in the displacement of existing residences, as the Project would maintain appropriate clearances pursuant to applicable codes and standards. Operation of the Project would not substantially displace existing people or housing and would not necessitate the construction of replacement housing elsewhere. Impacts related to displacing substantial numbers of existing people or housing would be less than significant during Project operation.

References. Section 3.14, Population and Housing, of the Draft EIR, page 3.14-15.

7.13.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these population and housing impacts associated with displacement and replacement housing would be less than significant.

7.14 PUBLIC SERVICES

As discussed in Section 3.15, Public Services, of the Draft EIR, the Project would result in less-than-significant operational impacts related to public services with respect to the following significance thresholds:

- Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:
    - Fire protection;

- Police protection;
- Schools;
- Parks; or
- Other public facilities?

Threshold. *Fire Protection*: (Operations) The Project would create an increased demand for fire protection services during Project operation. However, with adherence to the applicable regulations, coordination with LAFD, and implementation of an Emergency Operations Plan, which would be reviewed prior to the issuance of a building permit, operation of the Project would not create additional demand for LAFD services that would result in the need to add new—or physically alter existing— fire protection facilities. Therefore, impacts related to fire protection services during Project operation would be less than significant.

References. Section 3.15, Public Services, of the Draft EIR, pages 3.15-19 through 3.15-21.

7.14.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these public services impacts associated with fire protection services would be less than significant.

Threshold. *Police Protection*: (Operations) The Project would generate an increase in demand for police protection services during Project operation. However, with implementation of the Project's security features, as well as the development of an Emergency Operations Plan, the Project would not result in additional demand for LAPD and State Parks police protection services that would result in the need to add new—or physically alter existing—police protection facilities. Therefore, impacts related to police protection services during Project operation would be less than significant.

References. Section 3.15, Public Services, of the Draft EIR, pages 3.15-23 through 3.15-24.

7.14.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these public services impacts associated with police protection would be less than significant.

Threshold. *Schools*: (Operations) Once constructed, it is anticipated that the Project would require approximately 20 employees. Operation of the Project would not generate population growth because it does not include any housing, and therefore is not anticipated to cause a substantial demand for school services to the extent that it would require the provision of new or physically altered governmental facilities (i.e., schools). Therefore, impacts on schools during Project operation would be less than significant.

References. Section 3.15, Public Services, of the Draft EIR, page 3.15-25.

7.14.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these public services impacts associated with schools would be less than significant.

Threshold. *Other Public Facilities:* (Operations) Operation of the Project does not include new housing that would substantially increase the residential or employee populations in the area. Overall, the Project is not anticipated to cause a demand for other public facilities to the extent that it would require the provision of new or physically altered governmental facilities (i.e., libraries, senior centers, homeless bridge housing facilities, or childcare services). Therefore, impacts would be less than significant.

References. Section 3.15, Public Services, of the Draft EIR, pages 3.15-26.

7.14.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these public services impacts associated with other public facilities would be less than significant.

7.15 PARKS AND RECREATIONAL FACILITIES

As discussed in Section 3.16, Parks and Recreational Facilities, of the Draft EIR, the Project would result in less-than-significant impacts related to parks and recreational facilities with respect to the following significance thresholds:

- Would the Project result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?
- Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Parks?

Threshold. *Increased Use of Parks*: (Construction and Operations) A peak of approximately 100 total workers are anticipated during construction across all project components. It is anticipated that the labor force from within the region would be sufficient to complete the majority of project construction without a substantial influx of new workers and their families. It is anticipated that

construction workers would use parks and recreational facilities near their homes and families for recreational purposes. Should any construction workers use parks or recreational facilities in the Project Study Area on lunch breaks or after their shifts end, such park use would be rare because construction workers are temporary employees with high turnover associated with the various phases of construction. In addition, the use would be temporary and cease following construction. Construction of the Project would not generate a permanent increase or substantial temporary increase in the demand for parks or generate new permanent residents that would result in an increase in the use of existing parks and recreational facilities such that substantial deterioration of parks would occur or be accelerated. The Project would provide infrastructure through an ART system within urbanized downtown Los Angeles, and would increase connectivity in the Project Study Area, providing direct linkages for existing residents and communities to parks and recreational facilities, which has the potential to result in increased use of these facilities. However, existing facilities in the Project Study Area currently experience attendance at much lower rates than what the parks can accommodate. Therefore, the Project would not substantially increase the demand for offsite public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. These impacts would be less than significant.

While the Project would provide increased connectivity to existing parks for local residents, which has the potential to result in increased use of these facilities, existing facilities currently experience attendance at much lower rates than what the parks can accommodate. For example, the Los Angeles State Historic Park has historically accommodated events with attendance ranging from 6,000 to 22,500 visitors, and the weekday and weekend attendance for the park in 2019 was approximately 750 to 1,200. Regardless, the Project would provide additional concessions, restrooms, and covered breezeways similar to existing park amenities, as well as new features such as landscaping, shade structures, and seating to improve pedestrian access.

References. Section 3.16, Parks and Recreational Facilities, of the Draft EIR, pages 3.16-15 through 3.16-21; Topical Response F, Los Angeles State Historic Park, in Section 6.0, Responses to Comments, of the Final EIR.

7.15.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these recreational impacts would be less than significant.

Threshold. *Construction or Expansion of Recreational Facilities*: (Construction and Operations) The Project is a transit project that would construct an aerial rapid transit system between LAUS and Dodger Stadium and would not include the construction or expansion of recreational facilities. Operation of the Project would not include recreational facilities or require the construction or expansion of recreational facilities. The Chinatown/State Park Station would include construction of amenities within the park boundary, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Additionally, the Chinatown/State Park Station would include a

mobility hub. However, construction of the Chinatown/State Park Station would not directly include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical impact on the environment. Construction of the Alameda Station, Alameda Tower, Alpine Tower, Broadway Junction, and Stadium Tower would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical impact on the environment. Therefore, no construction impacts would occur at Alameda Station, Alameda Tower, Alpine Tower, Broadway Junction, or Stadium Tower. Construction of the Chinatown/State Park Station and the Dodger Stadium Station would not directly include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, construction impacts would be less than significant at the Chinatown/State Park Station and Dodger Stadium Station.

Operation of the Alameda Tower, Alpine Tower, Broadway Junction, and Stadium Tower would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, no operational impacts would occur at Alameda Tower, Alpine Tower, Broadway Junction, and Stadium Tower. The Alameda Station is a passenger station with vertical circulation elements and no recreational elements. Chinatown/State Park Station would not create or expand the existing use and capacity of the Los Angeles State Historic Park beyond what is already contemplated for the park. Dodger Stadium Station would not create or expand the existing use and capacity of Dodger Stadium or Elysian Park. Therefore, operational impacts would be less than significant at Alameda Station, Chinatown/State Park Station, and Dodger Stadium Station.

References. Section 3.16, Parks and Recreational Facilities, of the Draft EIR, pages 3.16-21 through 3.16-25; Topical Response F, Los Angeles State Historic Park, in Section 6.0, Responses to Comments, of the Final EIR.

7.15.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these recreational impacts associated with construction of expansion of recreational facilities would be less than significant.

Threshold. *Parks*: (Construction and Operations) As discussed Section 3.16, Parks and Recreational Facilities of the Draft EIR, the Project does not include recreational facilities, nor does the Project include residential uses that would result in the increased use of existing facilities. Accordingly, the Project would not necessitate construction of new facilities. These impacts would be less than significant.

References. Section 3.16, Parks and Recreational Facilities, of the Draft EIR, pages 3.16-25 through 3.16-29; Topical Response F, Los Angeles State Historic Park, in Section 6.0, Responses to Comments, of the Final EIR.

7.15.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these Parks and Recreational Facilities impacts would be less than significant.

7.16 TRANSPORTATION

As discussed in Section 3.17, Transportation, of the Draft EIR, the Project would result in less-than-significant impacts related to transportation with respect to the following significance thresholds:

- Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- Would the Project result in inadequate emergency access?

Threshold. *Circulation System*: (Construction and Operations) In 2019, the City adopted the LADOT Transportation Assessment Guidelines ("TAG"). The TAG includes a refinement to the analysis approach for determining whether a project conflicts with Plans, Programs, Ordinances, or Policies (PPOP). The PPOP analysis completed for the Project determined that the Project would be consistent with SCAG's RTP/SCS, consistent with the Mobility Plan 2035 policies regarding the provision of quality pedestrian access, and consistent with the Citywide Design Guidelines to incorporate vehicular access such that it does not interfere with pedestrian and/or vehicular circulation. Accordingly, the Project would have a less than significant impact.

References. Section 3.17, Transportation, of the Draft EIR, pages 3.17-32 through 3.17-33; Appendix N, Transportation Appendices, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.16.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these transportation impacts associated with programs, plans, ordinances, or policies addressing the circulation system would be less than significant.

Threshold. *Emergency Access*: (Operations) The Project stations would be readily accessible from adjacent City streets during an evacuation or fire situation affecting Project operations. Daily operations would not affect emergency response at the street level or to adjacent roadways or parcels because the cabins would be suspended above the public ROW. The Project is designed so that it would not affect roadway through lane capacity by any of the in-roadway structures proposed (i.e., Alameda Station). In addition, off-roadway structures would not hinder emergency response because the bases of stations, junction, and towers would not be in travel lanes. Therefore, the Project would have no substantive effect on emergency response during

operations. Impacts related to emergency access during operation of the Project would be less than significant.

References. Section 3.17, Transportation, of the Draft EIR, pages 3.17-66 through 3.17-67, Appendix N, Transportation Appendices, of the Draft EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.16.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these transportation impacts associated with emergency access would be less than significant.

7.17 UTILITIES AND SERVICE SYSTEMS

As discussed in Section 3.19, Utilities and Service Systems, of the Draft EIR, the Project would result in less-than-significant impacts related to utilities and service systems with respect to the following significance thresholds:

- Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Threshold. *Relocation or Construction of New or Expanded Facilities*: (Operations) Operation of the Project would require connections to existing utilities systems, including new connections to existing LADWP water pipelines and facilities, new connections to LASAN wastewater pipelines, connections to the LADWP power grid through installation of permanent, underground power lines, and an internal fiber optic line for communications. Impacts related to construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities for operation of the Project would be less than significant.

References. Section 3.19, Utilities and Service Systems, of the Draft EIR, pages 3.19-21 through 3.19-22; Section 5.0, Corrections and Additions, of the Final EIR.

7.17.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these utilities and service systems impacts would be less than significant.

Threshold. *Sufficient Water Supplies*: (Construction and Operations) Construction and operation of the Project would have sufficient water supply. The existing water supply sources are adequate to meet the demands for LADWP's service area, and construction of the Project would not increase water usage that would exceed the current supply. Impacts related to water supply during construction of the Project would be less than significant. LADWP would have adequate capacity to supply water for the Project and meet the demands for LADWP's service area. Operation of the Project would not increase water usage that would exceed the current supply. As such, impacts related to water supply during operation of the Project would be less than significant.

References. Section 3.19, Utilities and Service Systems, of the Draft EIR, pages 3.19-22 through 3.19-23; Section 5.0, Corrections and Additions, of the Final EIR.

7.17.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these utilities and service systems impacts would be less than significant.

Threshold. *Wastewater*: (Construction and Operations) Construction of the Project would not result in a determination by the wastewater treatment provider serving the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Construction activities associated with the Project would not result in substantial discharges of wastewater to the City's sewer collection system. Impacts related to adequate wastewater treatment capacity during construction of the Project would be less than significant.

Operation of the Project would not result in a determination by the wastewater treatment provider serving the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Therefore, impacts related to adequate wastewater treatment capacity during operation of the Project would be less than significant.

References. Section 3.19, Utilities and Service Systems, of the Draft EIR, pages 3.19-23 through 3.19-24; Section 5.0, Corrections and Additions, of the Final EIR.

7.17.3 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these utilities and service systems impacts would be less than significant.

Threshold. *Solid Waste*: (Operations) As discussed in Section 3.19, Utilities and Service Systems, the Project would not generate waste in excess of standards or in a way that would impair solid waste reduction goals. The Project would comply with federal, State, and local reduction strategies and regulations related to solid waste. Impacts related to solid waste generation during operation of the Project would be less than significant.

References. Section 3.19, Utilities and Service Systems, of the Draft EIR, pages 3.19-25 through 3.19-26; Section 5.0, Corrections and Additions, of the Final EIR.

7.17.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these utilities and service systems impacts would be less than significant.

7.18 WILDFIRE

As discussed in Section 3.20, Wildfire, of the Draft EIR, the Project would result in less-than-significant impacts related to wildfire with respect to the following significance thresholds:

- Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?
- Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?
- Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Threshold. *Substantially Impair an Adopted Emergency Response Plan or Emergency Evacuation Plan*: (Construction and Operations) As discussed in Section 3.20, Wildfire, in the Draft EIR, construction activities would not interfere with the implementation of the City's Emergency Operations Plan and related Annexes, or the Los Angeles County Operational Area Emergency Response Plan. The Project's construction activities would not interfere with any of the local authorities' prescribed roles or responsibilities during emergency response. Further, in the event of an emergency, the Project would comply with all regulatory requirements. Operation

of the Project would not impair the implementation of the City's Emergency Operations Plan or the Los Angeles County Operational Area Emergency Response Plan, and the Project would not result in any permanent roadway closures or changes that would impact access routes. Therefore, operation of the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and the impact would be less than significant. In addition, the Project would incorporate WFR-PDF-A to further support the emergency management phases of the Operational Emergency Response Plan.

References. Section 3.20, Wildfire, of the Draft EIR, pages 3.20-27 through 3.20-31; Appendix P, Fire Hazard Assessment, of the Draft EIR; Appendix I, Airspace Analysis Comment Response for the Los Angeles Aerial Rapid Transit Project, of the Final EIR; Appendix J, Reax Memo Re Attorney General Guidance, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.18.1 Project Design Features

WFR-PDF-A (see above)

7.18.2 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these wildfire impacts would be less than significant.

Threshold. *Exacerbate Wildfire Risks*: (Construction and Operations) The proposed Alameda Station, Alameda Tower, Alpine Tower, and Chinatown/State Park Station would be constructed outside of the VHFHSZ and in developed areas that would not be subject to increased fire risks from the Project construction. Broadway Junction, Stadium Tower, and Dodger Stadium Station would be constructed within the VHFHSZ; however, these locations are in and surrounded by developed areas or on sites otherwise largely confined by paved roads and existing development. The Project would be constructed consistent with applicable codes, regulations, and best construction practices such that the Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant. Nevertheless, in order to provide additional environmental benefits and further reduce the potential for wildfire risks, WFR-PDF-A and WFR-PDF-B, as set forth below, will be incorporated.

The Project would be operated in accordance with applicable building and fire codes and, therefore, would not exacerbate wildfire risks along the Project alignment or within a Project component site, nor would operations expose riders of the ART system to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

References. Section 3.20, Wildfire, of the Draft EIR, pages 3.20-31 through 3.20-40; Appendix P, Fire Hazard Assessment, of the Draft EIR; Appendix J, Reax Memo Re Attorney General Guidance, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.18.3 Project Design Features

WFR-PDF-A (see above)

WFR-PDF-B Prior to the start of construction, the Project shall provide a fuel modification zone surrounding the Stadium Tower construction site starting from the construction area perimeter of either 70 feet or until the nearest paved roadway that thins or removes all vegetation, dead or dry leaves and pine needles from the ground, and trims or remove trees to keep branches a minimum of 10 feet from other trees. The Stadium Tower construction site plan shows a buffer zone of 70 feet or to nearest paved roadway.

7.18.4 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these wildfire impacts would be less than significant.

Threshold. *Require the Installation or Maintenance of Associated Infrastructure*: (Construction and Operations) As discussed in Section 3.20, Wildfire, of the Draft EIR, the Project would require utility relocations prior to construction. Construction activities would be subject to strict design and construction standards, as required by LADWP, the LAFC, and Los Angeles Municipal Code. the Project will also incorporate the project design features in WFR-PDF-A and WFR-PDF-B prior to/during construction. Potential impacts from utility installations at this site would be less than significant. Accordingly, construction impacts related to the installation or maintenance of associated infrastructure would be less than significant. Operation of the Project would not require new roads, or emergency water sources. The utilities installed during construction of the Project components would be located underground and would not exacerbate fire risks. Battery storage would not significantly exacerbate fire risk. Therefore, operational impacts related to the installation or maintenance of associated infrastructure would be less than significant.

References. Section 3.20, Wildfire, of the Draft EIR, pages 3.20-40 through 3.20-42; Appendix P, Fire Hazard Assessment, of the Draft EIR; Appendix J, Reax Memo Re Attorney General Guidance, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.18.5 Project Design Features

WFR-PDF-A (see above)

WFR-PDF-B (see above)

7.18.6 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these wildfire impacts would be less than significant.

Threshold. *Exposure to Risk of Flooding or Landslides*: (Construction and Operations) The Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Alameda Station, Alameda Tower, Alpine Tower, Chinatown/State Park Station, and Broadway Junction would not be located in hillside areas. Each of these Project components would be sited in an urbanized setting, on relatively level terrain and served by City storm drains, which minimizes the risks associated with post-fire slope instability or drainage changes. The Project would have less than significant impacts on risks associated with post-fire landslides at Stadium Tower and Dodger Stadium Station because these sites are generally surrounded by existing roads and parking areas that minimize the risk of landslides originating from the sites, the slope of the sites would not substantially change during or after construction compared to existing conditions, and the Project would comply with regulatory standards to avoid or reduce erosion that could contribute to post-fire soil instability. Impacts would be less than significant.

References. Section 3.20, Wildfire, of the Draft EIR, pages 3.20-42 through 3.20-43; Appendix P, Fire Hazard Assessment, of the Draft EIR; Appendix J, Reax Memo Re Attorney General Guidance, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.18.7 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these wildfire impacts would be less than significant.

Threshold. *Exposure to Risk of Loss, Injury, or Death Involving Wildland Fires*: (Construction and Operations) The Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires with respect to evacuation or access during an emergency. The Project would be constructed consistent with applicable codes, regulations, and best construction practices such that the Project would not, expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Impacts would be less than significant. Nevertheless, in order to provide additional environmental benefits and further reduce the potential for wildfire risks, WFR-PDF-A and WFR-PDF-B will be incorporated.

Operation would not present a fire hazard because there are no known ignition sources resulting from standard operation of the proposed ropeway. While maintenance activities may include welding, the maintenance would occur within the developed envelope of the site and would not be exposed to high fuel loads, and operational policies, worker training, and regulatory compliance would minimize risks from such actions. Nevertheless, to provide additional environmental benefits and further reduce fire risks, the Project will incorporate the project design features in WFR-PDF-C during operations.

References. Section 3.20, Wildfire, of the Draft EIR, pages 3.20-43 through 3.20-47; Appendix P, Fire Hazard Assessment, of the Draft EIR; Appendix J, Reax Memo Re Attorney General Guidance, of the Final EIR; Section 5.0, Corrections and Additions, of the Final EIR.

7.18.8 Project Design Features

WFR-PDF-A (see above)

WFR-PDF-B (see above)

WFR-PDF-C During operation of Broadway Junction, Stadium Tower, and Dodger Stadium Station, security monitoring by staff and cameras shall be implemented. Project staff shall be trained to identify and report to the appropriate authority potential fire safety hazards, including the presence of sparks or smoke. Any fire ignited on site shall be promptly reported to LAFD.

Finding. For the reasons stated above and provided in the EIR, Metro finds that these wildfire impacts would be less than significant.

8. ENVIRONMENTAL RESOURCES FOUND TO NOT BE IMPACTED

One or more aspects of the following environmental resources would not be impacted by the Project:

- Aesthetics (Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?)

- Agriculture and Forestry Resources (Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code section 4256), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? Would the Project result in the loss of forest land or conversion of forest land to non forest use? Would the Project involve changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?)

- Biological Resources (Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? Would the Project have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? Would operations of the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?)

- Cultural Resources (Would operations of the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? Would operations of the Project disturb any human remains, including those interred outside of formal cemeteries?)

- Geology and Soils (Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? Would operations of the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?)

- Hazards and Hazardous Materials (Would operations of the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would construction and operations of the Project result in a safety hazard or excessive noise for people residing or working in the Project area?)

- Hydrology and Water Quality (Would the operations of Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?)

- Land Use and Planning (Would operations of the Project physically divide an established community?)

- Mineral Resources (Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?)

- Noise and Vibration (For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?)

- Transportation (Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) (Vehicle Miles Traveled)?)

- Tribal Cultural Resources (Would operations of the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, in in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Would operations the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in

Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Impact. There would be no impacts.

References. 3.1, Aesthetics, of the Draft EIR; Appendix C, Visual Impact Assessment, of the Draft EIR; 3.2, Agriculture and Forestry Resources, of the Draft EIR; 3.4, Biological Resources, of the Draft EIR; Appendix E, Biological Resources Assessment, of the Draft EIR; Appendix G, Supplemental Biological Resources Report, of the Final EIR; Appendix K.1, Updated Tree Report, of the Final EIR; 3.5, Cultural Resources, of the Draft EIR; Appendix F, Archaeological and Paleontological Resources Assessment, of the Draft EIR; 3.7, Geology and Soils, of the Draft EIR; Appendix I, Geotechnical Document in Support of the Environmental Impact Report, of the Draft EIR; 3.9, Hazards and Hazardous Materials, of the Draft EIR; Appendix O, Airspace Analysis Technical Memo, of the Draft EIR; Appendix I, Airspace Analysis Comment Response for the Los Angeles Aerial Rapid Transit Project, of the Final EIR; 3.10, Hydrology and Water Quality, of the Draft EIR; Appendix L, Hydrology and Water Quality Technical Study, of the Draft EIR; 3.11, Land Use and Planning, of the Draft EIR; 3.12, Mineral Resources, of the Draft EIR; 3.13, Noise and Vibration, of the Draft EIR; Appendix M, Noise and Vibration Technical Report, of the Draft EIR; 3.17, Transportation, of the Draft EIR; Appendix N, Transportation Appendices, of the Draft EIR; 3.18, Tribal Cultural Resources, of the Draft EIR.

8.1.1 Mitigation Measure

These impacts would be less than significant and do not require mitigation measures.

Finding. For the reasons stated above and provided in the Draft EIR, Metro finds that there would be no impacts.

9. CUMULATIVE IMPACTS

CEQA requires an EIR to consider both the individual and cumulative environmental effects of a Project as part of the impact analysis (CEQA Guidelines section 15130). A cumulative impact "refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA Guidelines section 15355).

Analysis of cumulative impacts first determines if the combined effects of the Project and other projects would result in a potentially significant cumulative impact. Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable (CEQA Guidelines section 15130). If there is a potential cumulative impact, the analysis determines if the Project's incremental effects

are cumulatively considerable and significant. “Cumulatively considerable” is defined as the “incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (CEQA Guidelines section 15065(a)(3)). Table 5-1: Related Projects, in Section 5.0, Other CEQA Considerations, of the Draft EIR, identifies the related projects considered in the cumulative impact analysis.

As discussed more fully in Section 5.0, Other CEQA Considerations, of the Draft EIR, Metro finds that cumulative impacts related to Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise (Operational Noise and Vibration, Construction Noise (Off-Site), and Construction Vibration (Building Damage)), Population and Housing, Public Services, Transportation, Tribal Cultural Resources, Utilities and Service Systems, Recreation, or Wildfire would not be significant. Thus, these impacts are not discussed further below.

9.1 NOISE

Threshold. *Cumulative Noise - Construction*: As discussed in Section 3.13, Noise, and Section 5.0, Other CEQA Considerations, of the Draft EIR, it is concluded that construction of the Project would result in significant impacts associated with construction noise.

On-Site Construction Noise

On-site construction of related projects (see Table 5-1 and Figure 5-1 in the Draft EIR) located along the Project alignment, would likely produce noise levels in excess of the Los Angeles Municipal Code maximum allowable noise level for construction equipment of 75 dBA when measured at 50 feet from the noise source as well as exceed exterior ambient noise levels by 5 dBA or more at a noise-sensitive use for construction activities lasting more than 10 days in a three-month period. These construction activities would also likely exceed the Federal Transit Administration’s thresholds of 80 dBA Leq during daytime at a residential, school, church, or park use property or 85 dBA at a commercial property.

On-site construction activities for the Project were found to exceed these thresholds at a number of locations of sensitive receptors that are in the vicinity of the related projects. To the extent certain of the related projects may be constructed during the same time period as the Project, noise emissions from construction of the Project, in combination with construction of related projects, would also exceed applicable noise thresholds resulting in a cumulative noise impact. Implementation of Mitigation Measure **MM-NOI-A** would reduce construction noise impacts of the Project, but noise levels in a number of locations would remain above the thresholds. The Project’s contribution to this cumulative noise impact would be cumulatively considerable.

Finding. Although the Project would implement Mitigation Measure **MM-NOI-A**, provided above, for the reasons discussed above and in the Draft EIR, Metro finds that these cumulative impacts due to on-site construction noise would be significant and unavoidable. No feasible mitigation

measures exist to mitigate the on-site construction noise impacts. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines. As described in the Statement of Overriding Considerations, Metro has determined that this temporary impact is acceptable because of specific overriding considerations.

Threshold. *Vibration – Construction*:

On-Site Construction Vibration - Human Annoyance

As discussed in Section 3.13, Noise, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the analysis concluded that the human annoyance threshold would be exceeded at Alameda Station (VSR-1, -2, -3 -4, -5, and -6), Alameda Tower (VSR-7, -8 and -9), Alpine Tower (VSR-10 and -11), Chinatown/State Park Station (VSR-13 and VSR-19), and Broadway Junction (VSR-14, -15, -16, and -17). This impact was determined to be significant and unavoidable because no feasible mitigation measures are available to reduce the vibration annoyance impacts identified for vibration-sensitive receptors from on-site construction activities of the Project. This is because the human annoyance threshold is exceeded by common occurrences such as vehicle pass-bys during construction. Such equipment is needed to build the Project and there is no alignment that would create sufficient separation from adjacent uses to eliminate the human impact.

Related projects could also be constructed at the same time and in proximity to the Project. Vibration levels generated by construction of related projects in combination with construction of the stations and towers of the Project would generally not increase the magnitude of the vibration levels at the closest sensitive receptors due to the distances between construction activities for each related project and the closest VSRs. Nevertheless, to the extent that simultaneous construction were to occur for equipment generating high vibration levels that are also nearly equidistant from the same VSRs, the vibration levels at the closest VSRs could increase and could exceed the human annoyance threshold. In that case, the cumulative vibration impact of construction in terms of human annoyance from on-site construction activities would be significant and unavoidable and the Project's contribution would be cumulatively considerable.

Off-Site Construction Vibration - Human Annoyance

As discussed in Section 3.13, Noise, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the analysis concluded that significant human annoyance impacts would occur at Alameda Station (VSRs 1-6), Alameda Tower (VSRs 7-9), Alpine Tower (VSR-10 and -11), Chinatown/State Park Station (VSR-13 and -19), Broadway Junction (VSR-14 and -15), and Bishops Road (VSRs 15-17), and no mitigation is available to reduce these impacts due to the proximity of Project haul routes to vibration-sensitive residential and institutional uses and lack of options for re-routing this traffic. Related projects could be constructed during the same period and also use these haul routes. Accordingly, it is anticipated that related projects may also have a significant human annoyance impact from off-site construction activities. As mentioned above, vibration levels related to truck traffic are not additive and the vibration annoyance limit is based on an instantaneous level generated by a single truck pass-by. If more trucks are added to the haul routes, there would be more pass-by events but, the magnitude of the vibration levels at the

closest sensitive receptors would not increase. Only the duration of exposures would increase, thus not causing an increase in vibration levels at any receptor from an increase in truck traffic along a specific roadway segment. Nevertheless, to the extent related projects use the same haul routes concurrent with the Project, impacts on human annoyance from off-site vibrations would be significant and unavoidable, and the Project's contribution would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.

Finding. For the reasons discussed above and in the Draft EIR, Metro finds that these cumulative impacts due to on-site and off-site construction vibration in terms of human annoyance would be significant and unavoidable, and the Project's contribution would be cumulatively considerable. No feasible mitigation measures exist to mitigate these impacts. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines. As described in the Statement of Overriding Considerations, Metro has determined that this temporary impact is acceptable because of specific overriding considerations.

10. ALTERNATIVES AND MITIGATION MEASURES

CEQA provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" (Pub. Resources Code, § 21002.) However, "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." (*Ibid*.) As defined by CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors. (Pub. Resources Code, § 21061.1; CEQA Guidelines, § 15126.6(f)(1).)

In determining whether an alternative or mitigation measure is "feasible" under CEQA, an agency may consider whether that alternative or mitigation measure will promote the project's objectives and goals. (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993), 23 Cal.App.4th 704, 715; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 [citing 2 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act (Cont.Ed.Bar 2d ed.2009) § 17.30, p. 825].) The feasibility determination also "encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society*, *supra*, 177 Cal.App.4th at p. 1001.) Broad policy decisions come into play when determining whether alternatives or mitigation measures are feasible, and "an alternative that 'is impractical or undesirable from a policy standpoint' may be rejected as infeasible." (*Ibid.* [quoting 2 Kostka & Zischke, *supra*, § 17.29, p. 824] [upholding agency's reliance on policy considerations like "promoting transportation alternatives" and "access to . . . open space for persons with disabilities" in making its infeasibility findings].)

10.1 ALTERNATIVES

CEQA requires lead agencies to consider a reasonable range of feasible alternatives to a proposed Project (CEQA Guidelines, § 15126.6). In determining "feasibility," factors that may be taken into account include "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." (CEQA Guidelines, § 15126.6(f)(1)). "Public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" (Pub. Resources Code, § 21002.) However, "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." (*Id*.)

Pursuant to CEQA Guidelines section 15126.6(a), the EIR described and evaluated a range of reasonable alternatives to the Project that would avoid or substantially reduce the significant impacts of the Project.

Pursuant to CEQA Guidelines section 15126.6(c), the EIR discussed additional alternatives that were considered for analysis but rejected as infeasible and explained the reasons for their rejection. Alternatives developed during the planning process for the Project were not considered for further detailed analysis in the Draft EIR because the alternatives either did not meet most of the basic project objectives, were deemed to be infeasible, and/or would not substantially lessen the predicted environmental impacts of the Project. The alternatives that were not further considered in detail were: Broadway Station Alignment Alternative; Combined Metro L Line (Gold) Station and College Street Station Alignment Alternative; and three Direct Alignment Alternatives that would be located in the City of Los Angeles, situated northeast of downtown Los Angeles, within the Downtown, Chinatown, Mission Junction, and Elysian Park communities, as well as the Pedestrian Enhancement Alternative. The "build" alternatives that were not considered in further detailed analysis would all result in similar significant and unavoidable impacts for construction noise and vibration (human annoyance) as the proposed Project, and therefore would not substantially lessen the predicted environmental impacts of the Project.

The EIR examined three alternatives to the Project in detail, which include the No Project Alternative, Spring Street Alignment Alternative, and Transportation Systems Management Alternative.

10.2 NO PROJECT ALTERNATIVE

Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the EIR is required to "discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, 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." In addition,

Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Thus, under this alternative, the proposed Project would not be implemented, and would not occur, and the existing environment would be maintained.

As such, the No Project Alternative provides a comparison between the environmental impacts of implementing the proposed Project in contrast to the result from not approving, or denying, the proposed Project. This alternative is intended to meet the requirements of CEQA Guidelines section 15126.6(e) for evaluation of a no project alternative. Under this alternative, no development would occur, and the environment would remain in its existing condition. Therefore, the No Project Alternative would avoid potentially significant impacts to all environmental considerations and would have no impact. However, environmental benefits to air quality, energy, greenhouse gas emissions, and hydrology and water resources would not be realized.

Although the No Project Alternative would avoid the Project’s significant impacts, Metro finds that specific economic, legal, social, technological, and other considerations render the No Project Alternative identified in the EIR infeasible. (CEQA Guidelines Section 15091(a)(3)). As the No Project Alternative would not include development of an ART system, it would not provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and would not improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region’s rapidly growing regional transit system at LAUS. Therefore, the No Project Alternative would not meet any of the project objectives. For these reasons, Metro finds that the No Project Alternative is not feasible. As such, Metro rejects this alternative and finds that it is not desirable or feasible based on the specific economic, social, and land use policy considerations outlined above.

10.3 SPRING STREET ALIGNMENT ALTERNATIVE

Similar to the Project, the Spring Street Alignment Alternative would provide an ART option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. The Spring Street Alignment Alternative would include three stations, a non-passenger junction, and four cable-supporting towers at various locations along the alignment. The Spring Street Alignment Alternative would include the following components in common with the proposed Project: Alameda Station, Alameda Tower, Alpine Tower, Stadium Tower, and Dodger Stadium Station. In addition to these components, the Spring Street Alignment Alternative would also include the following components that would be unique to this alternative: Spring Street Junction, State Historic Park Station, and Bishops Tower.

The Spring Street Alignment Alternative would commence adjacent to LAUS and El Pueblo de Los Angeles (El Pueblo) and extend approximately 1.3 miles to its termination at Dodger Stadium. The Spring Street Alignment Alternative would begin near El Pueblo and LAUS on Alameda Street at the proposed Alameda Station, which would remain the same as the proposed Project. From the Alameda Station, the Spring Street Alignment Alternative would follow the same alignment as the proposed Project, remaining primarily above the public right-of-way (ROW). The Spring Street

Alignment Alternative would continue north along Alameda Street and cross Alpine Street, where the proposed Alpine Tower would be constructed, and would follow the public ROW and continue over the elevated Metro L Line (Gold). The alignment would continue beyond College Street to the southernmost point of Los Angeles State Historic Park, where the proposed Spring Street Junction would be constructed. From the Spring Street Junction, the proposed alignment would continue to the proposed State Historic Park Station within the Los Angeles State Historic Park. At this location, the Spring Street Alignment Alternative would turn northwest over the Los Angeles State Historic Park and the Metro L Line (Gold) to Bishops Tower. From Bishops Tower, the Spring Street Alignment Alternative would cross over SR-110 to the proposed Stadium Tower. The northern terminus of the system would be the same as the proposed Project, being located in a parking lot at the Dodger Stadium property, where the proposed Dodger Stadium Station would be constructed.

As shown in Table 4-3, Alternative Impact Comparison, of the Draft EIR, the Spring Street Alignment Alternative would have similar environmental effects as the proposed Project. However, the Spring Street Alternative would impact a greater area within the State Historic Park due to construction of both the Spring Street Junction and State Historic Park Station. Therefore, impacts to construction noise from the Spring Street Alignment Alternative would be greater in magnitude than the proposed Project.

The purpose of the Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS. The Spring Street Alignment Alternative would include development of an ART system that provides a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improves connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS. As such, it would be consistent with most of the project objectives.

Although the Spring Street Alignment Alternative would be consistent with most of the project objectives, it would require a larger footprint within the Los Angeles State Historic Park. Overall, the proposed Project's Chinatown/State Park Station location was chosen over the other potential locations, including State Historic Park Station location as part of the Spring Street Alignment Alternative, because it minimized the proposed Project's potential footprint within the Los Angeles State Historic Park while maintaining transit access to the Park and surrounding communities, and is in closer proximity to the Metro L Line (Gold) station. As such, the Spring Street Alignment Alternative would not meet the following objective to the same extent as the proposed Project, and therefore, is considered to be only partially consistent with:

- Objective 11: Minimize the Project's environmental footprint through the integration of sustainability and environmentally friendly design features into the materials, construction, operations, and maintenance of the proposed Project.

For these reasons, Metro finds that the Spring Street Alignment Alternative is not feasible, as it fails to reduce significant impacts compared to the Project and would result in greater impacts to construction noise as compared to the Project due to the construction of both the Spring Street Junction and Chinatown/State Park Station. As such, Metro rejects this alternative and finds that it is not desirable or feasible based on the specific economic, social, and land use policy considerations outlined above.

10.4 TRANSPORTATION SYSTEMS MANAGEMENT (TSM) ALTERNATIVE

The Transportation Systems Management (TSM) Alternative would enhance the existing Union Station Dodger Stadium Express service to increase capacity of the Dodger Stadium Express. To meet service frequencies similar to the proposed Project, a minimum of 6 buses loading simultaneously would be required, which cannot be physically accommodated in the existing location for the Union Station Dodger Stadium Express, and an off-site loading facility would need to be developed to accommodate the new level of bus activity. As discussed on pages 4-60 and 4-61 and shown on Figure 4-13 on page 4-62, of Section 4.0, Alternatives, of the Draft EIR, the approximate footprint of a dedicated loading zone would need to be approximately as large as the shuttle bus loading facility at SoFi Stadium in the City of Inglewood. The Draft EIR identified the top deck of the Metro Division 13 bus maintenance facility as a potential site given its similar size. Furthermore, the existing Dodger Stadium Express service operates up to 8 buses per hour, while the TSM Alternative would require 77 buses per hour.

In addition to a new off-site loading facility, operational changes would be required on surrounding streets to accommodate the increased congestion from the TSM Alternative. Additional loading facilities would also be required at Dodger Stadium, including dedicated bus only lanes, to accommodate the increased level of Dodger Stadium Express service. As stated on pages 4-62 and 4-72, of Section 4.0, Alternatives of the Draft EIR, dedicated bus lanes would be implemented on Vin Scully Avenue between Sunset Boulevard and the entrance to Dodger Stadium as part of the TSM Alternative. The existing bus-only lanes on Sunset Boulevard and Cesar E. Chavez Avenue are only in operation between 7 a.m. and 9 a.m. in the eastbound direction and between 4 p.m. and 7 p.m. in the westbound direction, Mondays through Fridays. The hours of operation of these bus-only lanes could potentially be provided to be westbound on Sunset Boulevard and Cesar E. Chavez Avenue before every game (not just weekday evening games) and eastbound on Sunset Boulevard and Cesar E. Chavez Avenue after every game. This would expedite Dodger Stadium Express service (both for the existing Dodger Stadium Express service and the TSM Alternative) but could also increase traffic congestion and would displace existing curb parking that is currently used by the community.

Further, to the extent that Metro uses electric buses under the TSM Alternative, unlike the proposed Project, which pursuant to GHG-PDF-A, has pledged to purchase power required for operations from the LADWP Green Power Program, Metro has not proposed obtaining the electricity for its electric buses from green sources. Regardless of whether the shuttle buses would be electrified, the operational issues associated with substantially expanding the Dodger Stadium Express discussed above remain. Given that the Metro fleet would not be electrified until

well after the proposed Project's projected opening year, the analysis of the TSM Alternative presumes that the TSM Alternative shuttle buses would not be electric and would instead operate using natural gas as Metro's buses currently use.

Pursuant to CEQA Guidelines section 15126.6(a), the EIR described and evaluated a range of reasonable alternatives to the Project that would avoid or substantially reduce the significant impacts of the Project. As shown in Table 4-3, Alternative Impact Comparison, of the Draft EIR, the TSM Alternative would reduce impacts related to agriculture and forestry resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, noise and vibration, population and housing, public services, and recreation as compared to the proposed Project. The TSM Alternative would have similar impacts related to aesthetics, air quality, biological resources, energy, greenhouse gas emissions, hydrology and water quality, mineral resources, transportation, tribal cultural resources, utilities and service systems, and wildfire, as compared to the proposed Project.

However, under the TSM Alternative, there would be no aesthetic improvements to the existing proposed Project area. For example, landscaping improvements would not be installed, and the opportunity for site specific artwork at each station that is reflective of the unique neighborhood culture would not be implemented. As such, the TSM Alternative would not result in aesthetic benefits to the proposed Project area.

While operation of the TSM Alternative may result in an increased number of people traveling to Dodger Stadium by public transit compared to existing conditions, VMT would be higher compared to the proposed Project because the TSM Alternative would still operate vehicles on the roadway with additional buses creating an increase of activity and resulting in higher emissions compared to the proposed Project. Fuel use of the additional buses would also result in an increase of energy consumption compared to the proposed Project. Further, even if Metro transitions its bus fleet to electric buses by 2035, after the projected opening year for the proposed Project, the TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and therefore would not achieve the same level of emissions and fuel use reductions as the proposed Project. In addition, the TSM Alternative would not benefit from the proposed Project's green power commitments, as even if Metro transitions to electric buses, Metro has not proposed obtaining electricity from electric buses from green sources, and battery back-up system. As such, while the TSM Alternative could result in reduced VMT compared to existing conditions, the VMT reduction would be less than the proposed Project because the TSM Alternative would still operate vehicles on the roadway, thereby contributing to VMT and some congestion. Therefore, the beneficial improvements associated with the proposed Project would not occur. Additionally, compared to the proposed Project, people traveling to Dodger Stadium using public transit would be traveling on Dodger Stadium Express bus routes as opposed to the aerial tramway, and would not reduce associated GHG emissions and fuel use to the same extent as the proposed Project. Therefore, not all of the beneficial GHG reductions associated with the proposed Project would occur.

The TSM Alternative would not include installation of new LID, source control, site design, and treatment control BMPs to minimize runoff and water pollution, which would occur under the

proposed Project. The storm water leaving the Dodger Stadium Express routes would not be filtered and would continue to contain sediment and other potential pollutants associated with the existing conditions of the site. Therefore, the beneficial improvements associated with the proposed Project would not occur.

Under the TSM Alternative, the proposed Project would not be constructed, and instead the existing Union Station Dodger Stadium Express service would be enhanced to determine if the Dodger Stadium Express could increase the capacity of the Dodger Stadium Express similar to that of the proposed Project. As the TSM Alternative would not include development of an ART system, it would not provide a direct transit connection between LAUS and the Dodger Stadium property via an ART system and would not improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS. However, the TSM Alternative would provide enhanced transit access between LAUS and Dodger Stadium. As such, it would not meet the following objectives to the same extent as under the proposed Project and is, thus, considered to be only partially consistent with the following objectives:

- Objective 1: Expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium, a regional event center.
- Objective 3: Improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium.
- Objective 4: Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area.
- Objective 6: Increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property.

The TSM Alternative would not include development of an ART system and would not provide a direct transit connection between LAUS and the Dodger Stadium property via an ART system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS. As such, the TSM Alternative would not meet the following basic project objectives:

- Objective 2: Attract new transit riders to the Metro system through a unique experience connecting to Dodger Stadium.
- Objective 5: Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.
- Objective 7: Improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans.
- Objective 8: Bring a world class aerial transit system to the Los Angeles area.

- Objective 9: Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.

- Objective 10: Identify comparable, affordable, and accessible fare opportunities for community and Los Angeles State Historic Park and Elysian Park access.

- Objective 11: Minimize the Project's environmental footprint through the integration of sustainability and environmentally friendly design features into the materials, construction, operations, and maintenance of the proposed Project.

- Objective 12: Provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality.

Overall, the TSM Alternative would fail to meet the proposed Project's overall purpose of providing a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system, and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS, as it would provide a bus connection between LAUS and Dodger Stadium on Dodger game days only. Moreover, to reach the same capacity as the proposed Project, the TSM Alternative would require the acquisition of alternative sites that may require additional site improvements. Further, although the TSM Alternative would reduce certain temporary construction impacts, it would generate more VMT than the Project and therefore emissions that the proposed Project would not generate. In addition, the TSM Alternative would not provide the same level of benefits of the proposed Project, such as providing a direct transit connection between LAUS and the Dodger Stadium property via an ART system and improving connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the most riders travelling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. For these reasons, Metro finds that the TSM Alternative is not feasible. As such, Metro rejects this alternative and finds that it is not desirable or feasible based on the specific economic, social, and land use policy considerations outlined above.

10.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed Project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree.

Of the alternatives analyzed in the Draft EIR, the No Project Alternative would be considered environmentally superior because it would not involve new development and assumes on-site uses would continue to operate similar to existing conditions. Although the No Project Alternative would not meet any of the Project Objectives, it would avoid all of the Project's significant impacts, including the Project's significant and unavoidable construction noise and vibration impacts. Conversely, the No Project Alternative would not result in ART connections between the neighborhoods noted above. Additionally, VMT and vehicle congestion would not be reduced, and the associated reduction in GHG emissions and air quality improvements would not take place. However, the CEQA Guidelines require that the Draft EIR identify an environmentally superior alternative other than the No Project Alternative.

Table 4-3 of the Draft EIR provides a comparison of the impacts of each of the alternatives. The No Project Alternative and TSM Alternative would not result in significant unavoidable impacts to any environmental considerations.

The proposed Project and the Spring Street Alignment Alternative would result in similar impacts, each having significant unavoidable construction noise and vibration (human annoyance) impacts that cannot be reduced below a significant level with the implementation of mitigation measures. Additionally, they each would require implementation of mitigation measures to reduce potential impacts to less than significant for biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, public services, transportation and traffic, tribal cultural resources, utilities and services systems, and wildfire.

While both the proposed Project and Spring Street Alternative would result in significant and unavoidable impacts due to construction noise and vibration (human annoyance), the Spring Street Alternative would impact a greater area within the State Historic Park due to construction of both the Spring Street Junction and State Historic Park Station. Therefore, impacts to construction noise from the Spring Street Alignment Alternative would be greater in magnitude than the proposed Project.

As noted in Table 4-3, of the Draft EIR, the TSM Alternative would result in the same CEQA impact determination as the proposed Project for aesthetics, air quality, biological resources, energy, greenhouse gas emissions, hydrology and water resources, mineral resources, and transportation. However, as discussed above, the TSM Alternative's impacts would be less for aesthetics, agriculture and forestry resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, noise and vibration, population and housing, public services, recreation, tribal cultural resources, utilities and service system, and wildfire. Additionally, although the TSM Alternative's impact would be greater for air quality, energy, greenhouse gas emissions, hydrology and water quality, and transportation and traffic, it would not result in any significant and unavoidable impacts. As such, the TSM Alternative would result in the fewest environmental impacts overall. Therefore, the TSM Alternative would be considered the environmentally superior alternative.

However, the TSM Alternative would generate more VMT, and therefore emissions, than the proposed Project. In addition, the TSM Alternative would not provide the same level of benefits

as the proposed Project, such as providing a direct transit connection between LAUS and the Dodger Stadium property via an ART system and improving connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region's rapidly growing regional transit system at LAUS. As such, Metro rejects the TSM Alternative and finds that it is not desirable or feasible based on the specific economic, social, and land use policy considerations outlined above.

10.6 IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a Project. As stated in CEQA Guidelines Section 15126.2(d):

> *"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*

Section 5.0, Other CEQA Considerations, of the Draft EIR provides this analysis. As discussed therein, the Project would necessarily consume limited, slowly renewable, and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity and transportation. Consumption of these resources would be considered a primary impact. Secondary impacts that were considered include potential irreversible changes to land utility and changes resulting from hazardous accidents. As discussed below and in Section 5.0, Other CEQA Considerations, of the Draft EIR, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

10.6.1 Building Materials and Solid Waste

Construction of the Project would require consumption of resources that are limited and slowly renewable, and potentially which may renew slowly as to be considered non-renewable. These resources would include certain types of lumber, aggregate materials used in concrete and asphalt (e.g., sand, gravel, and stone), steel, and petrochemical construction materials (e.g., plastics). The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Project. However, this resource consumption would be consistent with growth and anticipated change in the Los Angeles region. Materials for the stations, junction, and towers would be locally sourced where possible, and would include recycled content where possible. Additionally, these materials are not in short supply and usage would not result in a

significant impact on continued availability of these resources. Labor would also be required to produce building materials; however, it is likely that the labor force from within the region would be sufficient to complete the majority of Project construction. Construction of more than one Project component would occur at the same time, with consideration of available materials, equipment, and workers.

As discussed in Section 3.19, Utilities and Service Systems, construction of the Project would generate construction waste from building demolition (1201 North Broadway), site clearing, removal of asphalt, and excavation. It is estimated that approximately 78,500 cubic yards of demolition debris would be generated, of which approximately 62,600 cubic yards would be soil, which is anticipated to not go to landfills, but is instead anticipated to be sold and/or reused for backfill. For the remaining approximately 15,900 cubic yards of demolition debris that would be generated, 65 percent would be diverted from landfills in accordance with CALGreen. As such, it is estimated that approximately 5,565 cubic yards of demolition debris would be hauled to the Sunshine Canyon Landfill, which can adequately accommodate the anticipated amount of solid waste generated for the Project. In addition, the Project would be required to adhere to federal, State, and local regulations for solid waste disposal, including AB 939, which requires all counties and cities to prepare a comprehensive solid waste management program that includes a Source Reduction and Recycling Element, and those identified in the City's Solid Waste Integrated Resource Plan to divert materials prior to disposal for recycling or reuse, where appropriate. Therefore, the Project would not conflict with the Solid Waste Integrated Resource Plan, AB 341, which sets forth the requirements of the Statewide mandatory commercial recycling program, and AB 939, CALGreen, and local management and reduction statutes related to solid waste. As such, solid waste would not be generated in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Regarding the operation of the Project, it would be developed in a densely populated urban area and would provide additional connectivity to local amenities in the vicinity of commercial and residential uses, potentially reducing, rather than increasing the need for additional infrastructure that would require similar building materials and produce similar quantities of solid waste. As such, continued phases of the Project would not result in a significant impact related to building materials and solid waste.

10.6.2 Water

Construction of the Project would require short-term and intermittent consumption of water, a resource that is slowly renewable. During construction of the Project, water from water trucks and gallon drums would be required for various activities, such as controlling dust, compacting soil, and mixing concrete. Project construction would require the use of locally available water supplies, distributed by LADWP. The Project would seek to use reused or recycled water prior to the use of potable water, if feasible. LADWP supplies an average of approximately 466 million GPD of water to its customers. LADWP has the ability to meet local water supply goals under normal year, dry year, and multiple dry year conditions; however, a multi-year drought that started in 2012 has resulted in LADWP investing in drought-resilient sources of potable water including stormwater capture and groundwater augmentation. The existing water supply sources are

adequate to meet the demands for LADWP's service area, and construction of the Project would not increase water usage that would exceed the current supply.

Operational water usage for the Project would include restrooms, concessions, landscaping, and washing down of facilities and other maintenance operations. This would require a total of approximately 6,655 GPD of water, of which approximately 3,072 GPD of water would be used by Park amenities operated by the Los Angeles State Historic Park. This required water usage is considered nominal compared to LADWP's average supply of 435 million GPD; therefore, operation of the Project would not increase water usage that would exceed the current supply.

Thus, as evaluated in Section 3.19, Utilities and Service Systems, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

10.6.3 Energy Consumption

Construction of the Project would require consumption of resources that are slowly renewable as well as non-renewable. These resources would include renewable electricity as well as the use of non-renewable fossil fuels, such as diesel, gasoline, and oil, and thus the existing supplies of these resources would be incrementally reduced. As discussed in Section 3.6, Energy, construction of the Project would require limited and temporary electricity consumption for construction trailers, construction equipment, and lighting, and would be provided by LADWP and supplied by the grid. Construction of the Project would result in a demand of approximately 864,544 kilowatt-hours (kWh) of electricity from the grid. This demand would be temporary, and in some cases would supplant electricity otherwise provided by another energy source, such as diesel generators. The Project's anticipated electricity usage during construction is anticipated to be approximately 0.9 Gigawatt-hours (GWh) in total or 0.45 GWh/year, which would constitute approximately 0.00014 percent to 0.00016 percent of the projected State-wide demand from 2019 to 2026. The California Energy Commission (CEC) estimates that energy demand in the LADWP planning area will increase to approximately 27,000 to 28,000 GWh in the 2024 to 2026 timeframe, meaning that the Project's contribution in that period would be approximately 0.002 percent of the projected demand.

Construction of the Project would also require the limited and temporary usage of transportation fuel, including gasoline and diesel for off-road construction equipment, haul trucks, vendor trucks, construction worker vehicles, and worker shuttles. The estimated total fuel usage from on-road vehicle trips associated with the construction of the Project is 69,355 gallons of gasoline and 84,144 gallons of diesel. The estimated total fuel usage from off-road construction equipment associated with the construction of the Project is approximately 155,304 gallons of diesel fuel. According to these estimates, construction of the Project would equate to approximately 0.15 percent of the annual amount of diesel and approximately 0.008 percent of the annual amount of gasoline that would be used citywide during Project construction. Construction of the Project would equate to less than 0.004 percent of the annual amount of diesel and approximately 0.0002 percent of the annual amount of gasoline and that would be used Statewide during Project construction. Fuel use during construction would be considered negligible when evaluated on a local and regional scale and would not adversely impact local or regional energy supplies or not

require additional capacity. In addition, the temporary energy consumption associated with construction would allow for a long-term reduction in energy consumption associated with Project operations related to reduced VMT, along with a decreased reliance on fossil fuels, as discussed below.

The electrical power for Project operations of the aerial gondola system and associated stations, junction, and towers would be supplied by LADWP through the utility's Green Power Program, pursuant to GHG-PDF-A. Accordingly, the primary electricity usage associated with the Project would come from renewable resources. When operating near capacity, normal operations are estimated to require approximately 2.5 megawatt (MW) of power. The peak demand in the LADWP planning area is expected to be 6,500 MW at Project build-out in 2026. As a result, the Project would have a negligible effect on LADWP peak demands. Once fully operational, the Project would result in electricity demand of approximately 6.9 GWh/year, which would constitute approximately 0.002 percent of the projected State-wide demand in that year. The CEC estimates that energy demand in the LADWP planning area would increase to approximately 28,000 GWh in 2026, meaning that the Project's contribution in that timeframe would be approximately 0.025 percent of the projected demand. Additionally, the Project would include the installation of backup battery storage at each station, tower, and junction to provide backup power to allow unloading of the system in the event of a power grid failure. The total backup power required is 1,400 kilowatts.

Additionally, operation of the Project would incorporate energy efficient features, such as open-air stations and high-efficiency lighting, which would lower the energy needs of the Project by allowing for passive ventilation strategies and natural daylight and use State-of-the-art gondola technologies, such as automated controls and contactless fare checking. The Project would also be designed to comply with all applicable State and local codes, including conformance with the City of Los Angeles Green Building Ordinance. Furthermore, operation of the Project would decrease the number of people traveling to Dodger Stadium and the surrounding area in passenger vehicles and increase the number of people using public transit. The overall shift is anticipated to reduce total VMT and vehicle idling time in and around Dodger Stadium associated with passenger vehicles, therefore reducing associated emissions and fuel use. When compared to existing conditions, the Project would reduce fuel usage from on-road mobile sources by 89,367 gallons of gasoline and 539 gallons of diesel in 2026, respectively, and 170,026 gallons of gasoline and 1,026 gallons of diesel in 2042, respectively.

Based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy. The Project benefits would include improved mobility, transit accessibility, and energy consumption. The resources committed and consumed would be considered appropriate because regional and area residents and visitors would benefit from improved transit services, which, in turn, would result in an overall decrease in the irreversible and irretrievable commitment of nonrenewable resources. Refer to Section 3.6, Energy, for further analysis regarding the Project's consumption of energy resources.

10.6.4 Environmental Hazards

Construction and operation of the Project has the potential to cause irreversible damage as the result of an environmental accident associated with the release or spillage of hazardous materials as such materials are transported and used. The Project's potential use of hazardous materials is addressed in Section 3.9, Hazards and Hazardous Materials. As discussed therein, it is anticipated that limited amounts of hazardous substances, such as solvents, paints, oils, hydraulic fluids, gasoline, diesel fuel, etc. would be transported to and used at the Project component sites throughout the construction duration. Construction activities would include the use of machinery and other equipment that may require fueling or maintenance/ servicing with other petroleum-based products (e.g., grease, oil). However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Thus, any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

Additionally, during construction, ground-moving activities such as excavation for the foundations of the stations, junction, and towers as well as the demolition of the existing building at 1201 North Broadway, would include disturbance of soils. The proposed sites of the Alameda Station, Alpine Tower, Chinatown/State Park Station, and Broadway Junction were listed in hazardous materials database listings. The Project would implement Mitigation Measure **MM-HAZ-A** to prepare a soil and groundwater management plan, which shall include sampling and analyzing soils/groundwater and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction to less than significant. Additionally, Mitigation Measure **MM-HAZ-B**, which would require hazardous materials abatement by a licensed abatement contractor prior to demolition of the existing building at 1201 North Broadway, would be implemented, which would reduce impacts to less than significant. With implementation of mitigation measures, it is not expected that the Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials during construction.

It is anticipated that operation and maintenance of the Project would include use of limited quantities of hazardous materials, such as oils, paints, solvents, and cleaners, which are not acutely hazardous. No operational activities are proposed that would result in the use or discharge of unregulated hazardous materials. Operation of the Project would transport, handle and store, and dispose of all materials in compliance with all codes, standards, and regulations, and it is not expected that the Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials during operations.

10.6.5 Land Utility

Land used to construct Project components is considered an irreversible commitment during the period the land is used. After construction is completed, land used for construction staging would be available for other uses. Furthermore, in regard to Project components within the public ROW,

and as discussed in Section 3.17, Transportation, development of a construction traffic management plan in coordination with LADOT is required as outlined in Mitigation Measure **MM-TRA-B**. The construction management plan would include street closure information, detour plans, haul routes, and a staging plan with review and approval from the City. Implementation of Mitigation Measure **MM-TRA-B** would minimize access interruptions within the Project Study Area and identify safe detour routes around the temporary closures for vehicles, bikes, and pedestrians. With implementation of Mitigation Measure **MM-TRA-B**, temporary construction impacts related to disruption of access between communities would be less than significant.

Implementation of the Project would commit land designated as public ROW, commercial, residential, and open space uses at the stations, junction, and towers to transit uses. The majority of the Project alignment and components would be constructed within or above the public ROW and/or publicly owned property. However, no housing or businesses would be displaced. As discussed in Chapter 2, Project Description, Subsection 2.11, Required Permits and Approvals, the Project Sponsor is seeking to amend LAMC Sections 12.32 and 11.5.7 to create an Overlay District or Specific Plan to provide for consistent application of Project design standards, limitations, and operational measures. With approval of the amendments to the zoning code to allow the Project uses, development of these Project components would not conflict with the applicable LAMC requirements at the time of Project implementation, and the impact would be less than significant.

With approval of the amendments to the zoning code to allow the Project uses, development of these Project components would not conflict with the applicable LAMC requirements or the General Plan land use designations at the time of Project implementation, and the impact would be less than significant.

Further, Plan Approvals under the existing Conditional Use Permit could be sought to allow for the Stadium Tower and Dodger Stadium Station sites, including an exception from the site's 1XL (Extra Limited Height) district designation. However, with the Plan Approvals, these Project components would be consistent with the provisions of the Conditional Use Permit applicable to the site, and no impact related to consistency with the LAMC would occur.

As such, the Project would be consistent with the policies of the City of Los Angeles which promote transit use and would not create a substantial irreversible commitment to land use.

Additionally, The Los Angeles State Historic Park General Plan identifies four types of land uses in its Preferred Park Concept Elements: Cultural Activities, Recreation Open Space, Garden Open Space, and Natural Open Space. These land uses do not contemplate a transit station like the Chinatown/State Park Station, which would have a footprint of 2,195 square feet in the park, and the station canopy would have an overhang of 9,320 square feet over the park. The Project's required aerial clearance width over the Los Angeles State Historic Park would be 53 feet 2 inches wide with an area of approximately 59,470 square feet, plus an Additional Separation Buffer.

Pursuant to Public Resources Code 5002.2, the Project would require the Los Angeles State Historic Park General Plan Amendment to amend the Preferred Park Concept Elements to include

a “Transit” land use to allow for the Project’s use, as well as to address the State historic park classification as defined in Public Resources Code 5019.59, which permits facilities for the comfort and enjoyment of the visitors, such as access. Given the large-scale events currently held at the Park (as discussed in Subsection 5.5.2, Special Events at the Los Angeles State Historic Park), additional transportation options to access the Park have the added benefit of reducing the detrimental impacts of those events to the Park and the neighboring communities. The General Plan Amendment is subject to the review and approval by the State Park Commission, which retains its independent authority related to the Project per Public Resources Code 21174. The Project is also anticipated to require easements and/or aerial easements, a lease or other agreement, a right of entry permit, and/or operational agreements related to the park.

Thus, with the General Plan Amendment, the construction and operation of the Chinatown/State Historic Park Station would be made consistent with the applicable goals and guidelines of Los Angeles State Historic Park General Plan as amended by the Los Angeles State Historic Park General Plan Amendment, and thus would not conflict with the goals, policies, and objectives of the Los Angeles State Historic Park General Plan adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to the Los Angeles State Historic Park would be less than significant. As such, the Project would be consistent with the policies of State Parks, which establish land uses appropriate to the Park and associated elements, and therefore would not create a substantial irreversible commitment to land use.

10.6.6 Conclusion

Based on the above, Project construction and operation would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant. Considering that the Project would consume an immaterial amount of natural resources, and it is a transportation alternative to automobile travel that would reduce VMT and increase connectivity of people to the region’s public transportation hub at Union Station and the Dodger Stadium property, and would increase connectivity in the Project area, providing direct linkages for existing residents and communities to parks and recreational facilities, the limited use of nonrenewable resources is justified.

10.7 GROWTH-INDUCING IMPACTS

Section 15125.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the CEQA Guidelines states that the EIR should:

> *"Discuss the ways in which the Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."*

Section 5.0, Other CEQA Considerations, of the Draft EIR provides this analysis. As discussed therein, induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without the implementation of a Project. Generally, growth-inducing projects are located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure, such as water or sewer facilities, or roads. Typically, the growth-inducing potential of a project would be considered significant if it results in growth or population concentration that exceeds those assumptions included in pertinent master plans, land use plans, or projections made by regional planning authorities. However, the creation of growth-inducing potential does not automatically lead to growth, whether it would be below or in exceedance of a projected level. The environmental effects of induced growth are secondary or indirect impacts of the Project. Secondary effects of growth could result in significant, adverse environmental impacts, which could include increased demand on community public services, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses.

In order to characterize the existing population, housing, and employment conditions in the vicinity of the Project, a 0.5-mile buffer around the Project alignment was established as the Project Study Area, as discussed in detail in Section 3.14, Population and Housing, of the Draft EIR. The total population for the Project Study Area in 2019, according to the U.S. Census Bureau, was approximately 33,108 residents compared to the total City population of 3,986,031 residents. (Table 3.14-2). In 2020, the County population was estimated to be 10,044,458 residents (Table 3.14-1). The average annual growth rate for the City from 2010 to 2020 was approximately 0.3 percent (Table 3.14-1), and more recently in 2020 the annual growth rate indicated negative growth at approximately -1.3 percent. The City's average annual growth rate is higher than the County's average annual growth rate from 2010 to 2020 (0.42 percent); however, the County's 2020 annual growth rate of -0.9 percent suggests that even though people were leaving the area, the rate of people leaving the City was greater than the County. The total number of housing units for the Project Study Area in 2019, according to the U.S. Census Bureau, was 11,846 (Table 3.14-4). In 2020, the number of housing units was 1,535,606 in the City with an anticipated 16.8 percent increase by 2045, and over 3.6 million in the County, with an anticipated 13.9 percent increase by 2045 (Table 3.14-3). The total number of people employed in the Project Study Area in 2019, according to the U.S. Census Bureau, was 30,695 (Table 3.14-7). In 2019, the number of people employed was 2,155,700 in the City and 5,313,215 in the County (Table 3.14-6). By

2045, the number of people employed in the City is projected to be 2,135,900 and the number employed in the County is projected to be 5,382,000 (Table 3.14-6). This anticipates a 0.9 percent decrease in employment for the City and a 1.3 increase in the County. Although private vehicles are the main means of commute for both residents in the Project Study Area and overall City of Los Angeles, residents in the Project Study Area utilize public transportation and walking (13.3 percent and 9.3 percent, respectively) more than the overall City of Los Angeles population (8.8 percent and 3.4 percent, respectively (Table 3.14-8).

Considering the above environmental setting, the following discussion, as well as Section 5.0, Other CEQA Considerations, of the Draft EIR, considers whether or not the Project would foster population or employment growth, or the construction of additional housing, either directly or indirectly, on both a regional and local scale.

The Project alignment would be located within the urbanized and developed City of Los Angeles. The Project would link the Dodger Stadium property to the region's rapidly growing regional transit system at LAUS, thereby increasing overall system efficiency. The Project would improve the mobility and accessibility for people in the area by providing an ART to the regional transit system at LAUS and provide a first/last mile transit connection to Dodger Stadium, for existing residents, workers, park users, and visitors to Los Angeles. The Project does not include any new housing. Instead, it would provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, Echo Park, and Solano Canyon. These areas are being developed with various mixed-use developments, which include both residential units and commercial spaces. As such, the Project is intended to accommodate existing and future transportation needs of the area's population and would not directly induce growth.

As discussed in Section 3.14, Population and Housing, of the Draft EIR, the Project would not induce substantial unplanned population growth indirectly. Construction employment generated by the Project would not change population in the heavily populated Los Angeles region. Given the temporary nature of construction industry jobs, the relatively large regional construction industry, and the total number of construction workers needed during any construction phase, it is likely that the labor force from within the region would be sufficient to complete the majority of project construction without a substantial influx of new workers and their families. Any such relocation within the region would be minimal. Although specialized personnel including ART manufacturer and cable specialists would be on site during construction phases involving the installation of the ART system and cable pulling, they are expected to utilize existing seasonal accommodations and leave once construction is completed. Impacts related to induced population growth due to employment opportunities during construction of the Project would be less than significant. Employees for operations, maintenance, and concessions (approximately 20) are expected to be drawn from the local labor force and would not induce substantial unplanned population growth.

As discussed in Section 3.15, Public Services, of the Draft EIR, because the Project would not include any new housing, and because it is likely that the labor force from within the region would be sufficient to complete construction and support operation of the Project, it is not anticipated to

cause a substantial demand for fire or police protection services such that it would require the provision of new or physical altered governmental facilities (i.e., fire and police stations). Project implementation would not impact population in the heavily populated Los Angeles region that would result in additional demand for schools such that it would result in the need for new or physically altered schools. Additionally, the Project is not anticipated to cause a demand for other public facilities such that it would require the provision of new or physical altered governmental facilities (i.e., libraries, senior centers, homeless bridge housing facilities, or childcare services). Therefore, the Project would not induce population growth that could affect service ratios, response times, or other performance objectives for public services.

The ART system would increase connectivity in downtown Los Angeles and provide direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, Dodger Stadium, and Elysian Park. The Project Study Area includes a population of which approximately 25 percent of the residents in the Project Study Area utilize either public transportation or walking for commuting to work. As discussed in Chapter 2, Project Description, of the Draft EIR, and Section 3.0, Project Description, of the Final EIR, Dodger Stadium is one of the region's most visited venues; however, there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets, throughout the surrounding communities, and on the nearby freeways. As the region's population grows and resulting travel needs continue to increase, the local and regional roadway system is likely to experience greater congestion. When complete, the travel time from LAUS to Dodger Stadium would be approximately 7 minutes during peak operations (games/events at Dodger Stadium). Approximately 20 percent of visitors could take aerial transit connected to Metro's regional transit system. By creating a high-quality and high-capacity rapid transit connection between LAUS and Dodger Stadium, the Project would provide a more viable choice in making a trip to a Dodger game or event at the stadium.

With Metro's existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the Project provides the opportunity for anyone in the Los Angeles County region to access Dodger Stadium via public transit. While other transit projects in general could induce growth at the regional scale by focusing on faster commute times, thus enticing more widespread residential options, the specific transit needs met by the Project address the issue of regional accessibility and improved efficiency to visiting Dodger Stadium and provide a first/last mile transit connection to Dodger Stadium for existing residents, workers, and visitors to Los Angeles. It is unlikely that this benefit would result in construction of new housing in the region, and therefore indirectly induce growth.

On a local scale, the Project would link residents to the Dodger Stadium property and enhance community connectivity. The ART system would increase connectivity in downtown Los Angeles and provide direct linkages to major residential, employment, and tourist destinations. By facilitating access to existing transit systems and increasing connectivity in downtown Los Angeles, the Project may increase the attractiveness of the corridor for living and conducting business, resulting in increased activity near the proposed stations. However, such indirect

impacts on adjacent communities would generally be positive. Given that the area in the City where the Project alignment is located is densely urbanized and there are existing planned developments for the area, this would be a benefit for existing and planned uses in the area.

As discussed in Section 3.11, Land Use and Planning, of the Draft EIR, and Section 5.0, Corrections and Additions, of the Final EIR, the Project would support the City's goals from the Housing Element, Central City Community Plan, and Downtown Los Angeles 2040 Draft Community Plan of providing transit near residential development. Nevertheless, the Project is not anticipated to substantially generate new development beyond what is already planned within the area. As such, the Project is not anticipated to stimulate development to a level inconsistent with applicable planned local land use designations. Should any future development occur in the surrounding Project area, as discussed in Section 3.11, Land Use and Planning, of the Draft EIR, and in Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property, in Section 6.0, Responses to Comments, of the Final EIR, such development would be subject to additional environmental analysis under CEQA, and would be required to comply with City of Los Angeles Community Plan policies encouraging development near transit stations and corridors. Operation of the Project would not induce substantial population growth either directly or indirectly. Impacts related to induced population growth during operation of the Project would be less than significant.

10.8 FINDINGS FOR MITIGATION MEASURES

The Metro Board has considered every mitigation measure recommended in the Draft EIR and included in the Mitigation Monitoring and Reporting Program (MMRP). Metro hereby binds itself to implement or, as appropriate, require implementation of these measures. Metro finds that the measures included in the MMRP constitute changes or alterations which avoid or substantially lessen significant effects on the environment. The MMRP will be adopted concurrently with these Findings and will be effectuated through the process of constructing and implementing the Project. As described above in Section 5 of these Findings, Metro has rejected as infeasible other potential mitigation measures considered in the EIR.

Some comments on the Draft EIR suggested additional mitigation measures and/or modifications to the measures recommended in the Draft EIR. As shown in the Final EIR, Metro incorporated suggestions where appropriate or Metro explained why the suggested mitigation measures were not feasible and/or not superior to the mitigation measures identified in the Draft EIR. The Metro Board acknowledges staff for its careful consideration of these comments and agrees with the Final EIR in those instances when staff did not accept proposed language, and hereby ratifies, adopts, and incorporates the Final EIR's reasoning on these issues.

11. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to CEQA Guidelines section 15093, if a project's EIR and administrative record substantiate that the project would result in significant and unavoidable impacts, then the lead agency is required to balance the project's significant and unavoidable impacts against its

economic, legal, social, technological, or other benefits. If these benefits outweigh the significant and unavoidable impacts, then the significant and unavoidable impacts may be deemed acceptable. In such a case, the lead agency must state, in writing, the specific reasons that support this conclusion. This section presents the Project's potential significant and unavoidable impacts followed by Metro's findings as to why the Project's benefits outweigh these significant and unavoidable impacts.

11.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The Project would result in the following significant and unavoidable impacts:

Noise (Construction). Construction of the Project would have a significant and unavoidable noise impact for on-site activities. Mitigation Measure **MM-NOI-A** would reduce construction noise impacts to the extent practicable. However, significant impacts from noise levels due to on-site construction activities would remain at the Los Angeles Union Station Terminal (NSR 1A), El Pueblo (NSR 2), Mozaic Apartments (NSR 3), The California Endowment Building (NSR 4), the future Homeboy Industries Residential (NSR 5), Chinatown Senior Lofts (NSR 6), Homeboy Industries (NSR 7), Future Residential Development (NSR 8), Blossom Plaza (NSR 9), Future Residential Development (NSR 10), Capitol Milling (NSR 11), Llewellyn Apartments (NSR 12), Los Angeles State Historic Park (NSR 14 N/S), Cathedral High School (NSR 16), and Low-Rise Residential on Savoy Street (NSR 17N/S). These impacts are temporary and will only last as long as the construction activities. Nonetheless, construction noise impacts would remain significant and unavoidable. Construction of the Project would have a significant and unavoidable vibration (human annoyance) impact. There are no feasible mitigation measures to reduce the vibration (human annoyance) impacts identified for vibration-sensitive receptors from on-site construction activities as well as along the Project alignment for off-site construction activities. As such, vibration (human annoyance) impacts would remain significant and unavoidable.

11.2 DETERMINATION

The below stated reasons summarize the benefits, goals, and objectives of the Project, and provide the rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, cultural/historical, technological, and environmental benefits for the Project justify adoption of the Project and certification of the completed Final EIR. Each of these overriding considerations individually would be sufficient to outweigh the adverse environmental impacts of the Project. Metro concludes that the overall benefits of the Project outweigh the significant and unavoidable temporary impact discussed above, and that the significant and unavoidable impacts are thus considered acceptable.

Metro hereby adopts the following Statement of Overriding Considerations. Metro recognizes that significant and unavoidable impacts would result from implementation of the Project. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the Project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Project against the Project's significant and unavoidable impacts, Metro hereby finds the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

Further, Metro finds that adoption and implementation of any and/or all of the Design and Use Options described in Section 6.0, Design and Use Options, of the Draft EIR, will have the same economic, social, legal, technological, and other considerable benefits as the Project, listed below.

The Project would provide the first permanent transit connection to Dodger Stadium, one of the region's most visited venues, and expand mobility options for an underserved community.

As provided in Section 2.0, Project Description, of the Draft EIR, the underlying purpose of the Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. ART is a proven, zero emission, safe, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector. The Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles.

The Project would provide a variety of benefits as an aerial rapid transit system connecting LAUS to Dodger Stadium.

In general, the Project would result in the following benefits:

- Expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium, a regional event center.
- Attract new transit riders to the Metro system through a unique experience of an aerial transit system connecting to Dodger Stadium.
- Improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium.
- Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area.

- Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days.

- Increase connectivity of people to the region's public transportation hub at LAUS and the Dodger Stadium property.

- Improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans.

- Bring a world class aerial transit system to the Los Angeles area.

- Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.

By reducing congestion and VMT, the Project would reduce GHG emissions and provide air quality benefits to communities in the Project area.

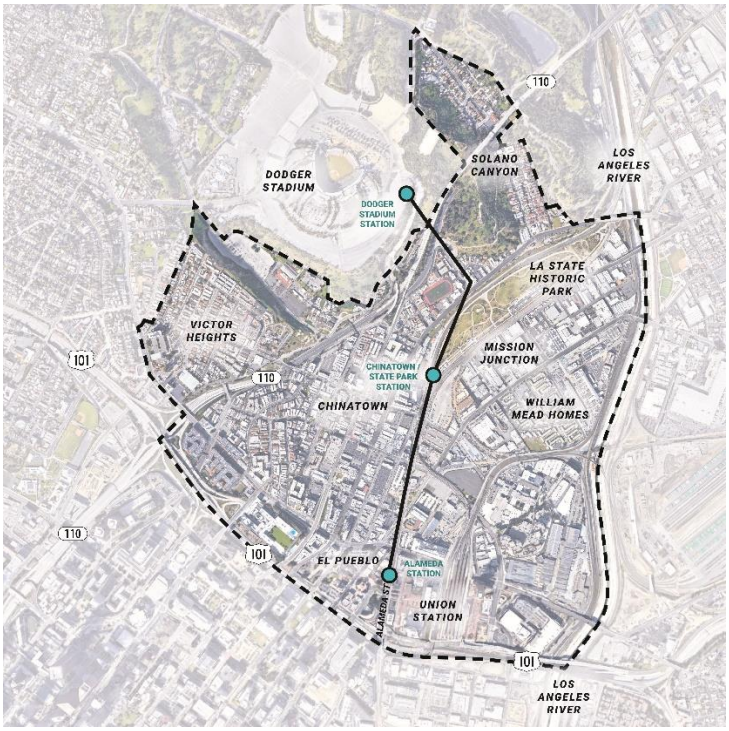
The Project would also result in air quality benefits to communities in the Project area. As the region's population grows and resulting travel needs continue to increase, the local and regional roadway system is likely to experience greater congestion. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue, unlike other high-capacity venues in the region. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the Project would result in air quality benefits to the surrounding communities.

As discussed in Section 1.4.3, Senate Bill 44, of Section 1.0, Introduction, of the Draft EIR, the lifetime emissions of the Project over its useful life (30 years based on SCAQMD's guidance for GHG significance thresholds) would be a reduction of 166,653 MT CO2e. In the same section, the Draft EIR notes that the lifetime VMT reduction of the Project over its useful life would be 129,629,500 VMT. As discussed in Section 3.03, Air Quality, of the Draft EIR, emissions are decreased through reducing vehicle miles traveled, and the "Project would result in a net reduction in criteria pollutant emissions in both 2026 (Build Out) and 2042 (Horizon Year) by reducing vehicle miles traveled and thereby decreasing emissions compared to existing conditions."

The Project would allow all residents, employees, and businesses located close to the Project to ride the gondola using their Metro fare at no additional cost under the proposed

Community Access Plan, serving as an additional transit option and first/last mile-connector for transit users in the community.

The Project would allow all residents, employees, and businesses located close to the Project to ride the gondola using their Metro fare at no additional cost under the proposed Community Access Plan. The graphic below demonstrates the geographic area for the Community Access Plan applicability. Moreover, under the Community Access Plan, transfers to and from the Metro regional transit system and the Project would be free. The Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.). Residents and employees of businesses located within the communities adjacent to the Project alignment would only pay the rate they pay to ride the Metro system to the Project. The Project would also be free to ride for anyone with a ticket to a Dodger game.



The Project would reduce traffic congestion and provide air quality benefits in communities disproportionately burdened by multiple sources of pollution.

The communities in the vicinity of the Project alignment were identified as being in the 90 – 100 percentile of communities disproportionately burdened by multiple sources of pollution in the State based on the California Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0 Map. The Project would include features to enhance and provide additional benefit to the surrounding community. These include (i) improved transportation connectivity in Metro's Equity Focused Communities ("EFCs") where transportation needs are greatest; (ii) reduced vehicular congestion in and around Dodger Stadium which reduces VMT and GHG emissions resulting in air quality benefits in communities disproportionately burdened by multiple sources of pollution; (iii) sustainability features and open space enhancements; (iv) active transportation connectivity

including first/last mile multi-modal options at the mobility hubs proposed for Chinatown/State Park Station and Dodger Stadium Station; (v) improved access to Los Angeles State Historic Park and Elysian Park; and (vi) safety and security features including security cameras at the stations, junction, towers, and in cabins and low-level lighting for security and wayfinding purposes.

The Project is consistent with the applicable regional transportation plan's strategies and goals to improve mobility and reduce VMT in the region.

The Project is consistent with the applicable sustainable communities strategy and alternative planning strategy and the applicable regional transportation plan – the Southern California Association of Governments' 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), called Connect SoCal. The plan outlines ten main goals, each of which the Project is consistent with. Refer to the table on pages 1-6 to 1-7 in Section 1.0, Introduction, of the Draft EIR for a more detailed discussion of the Project's consistency with these goals.

The Project would provide improved mobility, accessibility, reliability and travel choices for people traveling in Los Angeles to a major event destination (Dodger Stadium), as well as provide improved transit service to adjacent communities. The Project would reduce GHG emissions by reducing VMT. Accordingly, the Project would be consistent with goals in Connect SoCal and is, thus, consistent with the applicable sustainable communities strategy and regional transportation plan.

The Project is consistent with the City of Los Angeles' General Plan policies related to promoting health, sustainability, and equity.

The City's General Plan Framework Element establishes several health-promoting principles, including equity in such considerations. Similarly, the City's Mobility Element has a strong public health focus centered around promoting sustainability and increasing access to active transportation. As provided in Table 3.11-3, Project Consistency with Applicable City of Los Angeles General Plan Policies, of the Draft EIR, the Draft EIR analyzed the Project's consistency with these policies. For example, as discussed in Section 3.11, Land Use and Planning, of the Draft EIR, the Project supports Framework Element Objective 5.8 by reinforcing or encouraging the establishment of strong pedestrian orientation in the surrounding communities and facilitating multi-modal access to and from the stations with pedestrian network improvements. Consistent with this objective, the Draft EIR notes how "[t]he proposed Project would also enhance community connectivity to areas that have historically been underserved and provide pedestrian enhancements so that the areas surrounding the stations can serve as a focus of activity for the surrounding community and a focus of investment in the community." Section 3.11, Land Use and Planning, of the Draft EIR, discusses how the Project is consistent with Framework Element Policy 38, seeking to enhance neighborhood accessibility by "provid[ing] new connections to and between currently underserved neighborhoods and uses along the proposed alignment" while including a "mobility hub at the Chinatown/State Park Station where passengers would be able to access a suite of first mile and last mile multi-modal options, such as a bike share program." In addition to facilitating a potential bike share program, the Project's cabins would accommodate bicycles, as described in Section 2.0, Project Description, of the Draft EIR. Further, the

Chinatown/State Park Station location may provide bicycle access from the adjacent proposed Los Angeles River bicycle path (anticipated to open in 2027) to the bicycle and hiking trails in Elysian Park.

The Draft EIR also analyzed the Project's consistency with the City's Mobility Element in Section 3.17, Transportation. The Project would ensure quality pedestrian access by facilitating "multi-modal access to and from the stations with pedestrian network improvements." Such improvements would be targeted especially at the areas surrounding the proposed Dodger Stadium Station to provide a safe and efficient connection for pedestrians traveling between the station and the stadium. The Project would also provide quality pedestrian access to communities surrounding Dodger Stadium, further advancing the environmental justice goals of the City's Mobility Element. A key policy initiative of the City's Mobility Element is to "embed equity and environmental justice into the transportation policy framework, project implementation, and action programs." Because the Project would bring quality pedestrian access to areas around Dodger Stadium that previously have lacked such access, the Draft EIR concluded that the Project would be consistent with the policies of the City's Mobility Element to ensure the provision of quality pedestrian access.

The Project would result in technological benefits, spurring other emerging innovations to be integrated in the public transit system.

As discussed in the Technology Penetration Analysis, included in Appendix J, Greenhouse Gas Emissions Technical Report, of the Draft EIR, the Project will introduce the first aerial gondola system to the Los Angeles area, and the first aerial gondola system in a densely populated area in the United States since 2007. The Project will facilitate acceptance of transportation alternatives. As a breakthrough and innovative technology for the region, the Project advances future alternative transportation systems and technology in the Los Angeles region while providing a template for other innovative aerial projects elsewhere in California and the United States.

A large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

The Project incorporates sustainable infrastructure practices, including the policies and standards of the of the Envision Rating System of the Institute for Sustainable Infrastructure, as well as USGBC's LEED for Building Design and Construction and has incorporated sustainability features based on these rating systems.

The Project is an innovative and sustainable transit system that provides a sustainable, high-capacity, zero emission aerial rapid transit option for visitors to Dodger Stadium, while also providing access between Dodger Stadium, the surrounding communities, and the regional transit system accessible at LAUS. Aerial rapid transit technology is quiet, minimizing noise and vibration, and the Project would reduce VMT and congestion, leading to reduced GHG emissions and improved air quality.

The Project has been reviewed against the policies and standards of the Envision Rating System of the Institute for Sustainable Infrastructure, as well as USGBC's LEED for Building Design and Construction and has incorporated sustainability features based on these rating systems. As discussed in Section 2.7.9, Sustainability Features, of the Draft EIR, the Project would include several sustainability features, including the installation of landscaping at the Alameda Station, Alpine Tower, Chinatown/State Park Station, Stadium Tower and Dodger Stadium Station, which would include drought tolerant landscape features and low water use irrigation strategies. The station, junction, and tower hardscape materials would also be selected to reduce Solar Reflective Index values to minimize the heat island effect. At the Chinatown/State Park Station, shade structures and potential seating would be included. The Project would also provide open space enhancements at the Los Angeles State Historic Park and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium.

Accordingly, the Project would incorporate sustainable infrastructure practices to achieve sustainability, resiliency, and climate change mitigation and adaptation goals in the Project, including USGBC's LEED rating system and the Envision Rating System of the Institute for Sustainable Infrastructure's policies and standards.

The Project supports Metro's goals of improving equity outcomes.

The Project would also support Metro's goal of improving equity outcomes. The Project would be free to ride for anyone with a ticket to a Dodger game. In addition, the Project would allow all residents, employees, and businesses located close to the Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan. Moreover, under the Community Access Plan, transfers to and from the Metro regional transit system and the Project would be free. The Community Access Plan would honor Metro's numerous discount fare programs for a variety of needs (i.e., senior fares, student fares, etc.). The Project would also comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"), including accommodating wheelchairs. Further, during the Project's construction phase, the Project Sponsor has committed to a goal of 35 percent utilization of MBEs, WBEs, DBEs, SBEs, DVBEs, and LGBTQ-owned businesses. In addition, each station of the Project could provide an opportunity for site-specific artwork commissioned from artists from the surrounding community, that is reflective of the unique neighborhood culture, and has also committed to one "Art Cabin" that could feature artwork commissioned from local artists.

Metro and the Project Sponsor have engaged, and will continue to engage, in community outreach to ensure equitable outcomes related to the Project. These efforts include multilingual door knocking, provision of project information materials in multiple languages, numerous public meetings with provision of materials and interpretation in multiple languages, and partnerships with various cultural, educational, and business community organizations, including Cathedral High School, the Chinese American Museum, the Italian American Museum, Chinatown businesses, and Olvera Street Merchants. Public outreach for the Project was designed with environmental justice principles in mind – ensuring that people have fair and equal access to the planning process regardless of race, culture, national origin, disability status, or income. Public outreach was also designed to ensure compatibility with Metro's equity goals by providing

community members the ability to meaningfully engage with information about the Project and ask questions and provide public comments in their native languages. This ensures Metro can intentionally collaborate and listen to community experiences from all community members by removing barriers to communication and accessibility.

The Project would expand rider access to the regional transit system and create economic opportunities for businesses along the Project alignment.

The Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the Project alignment, including MBEs, WBEs, DBEs, SBEs, DVBE, and LBGTQ-owned businesses. In addition to providing accessible and affordable mobility options for these businesses' employees and expanding transit access to the area, the Project would create economic opportunities for potential partnerships with these businesses.

As discussed in Section 2.0, Project Description, of the Draft EIR, the Project creates a first/last mile transit link for residents and businesses within the impacted communities of El Pueblo, Chinatown, Solano Canyon, Victor Heights, and Mission Junction, while unifying and connecting communities through transit mobility access. This new mode of transportation will expand rider access to the regional transit system by attracting new visitors, and represents an opportunity to increase pedestrian traffic along the Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to El Pueblo, Chinatown and other areas along the Project alignment, which, consequently, adds revenues to these businesses in the communities the Project hopes to serve. For example, as discussed in the Parking Study, the Project could implement business to business partnerships with local businesses to pre-sell bundled packages that include patronage at the local business, as well as off-street parking, and a ticket to ride the Project.

As discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR, the locations of the Project's Alameda Station and Chinatown/State Park Station optimize pedestrian access, driving customers to local businesses. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. The Project, in addition to helping to promote and provide added connectivity to the Chinatown area, also would locate its Chinatown/State Park Station within a 3-minute walk to/from Metro's L Line (Gold) Chinatown Station as a way to drive additional foot traffic to Chinatown and provide direct access to the Los Angeles State Historic Park. The Project would provide area residents and businesses with transit access to local businesses and institutions. The Project could partner, for example, with the Chinese American Museum, the Italian American Museum, Chinatown businesses, and Olvera Street Merchants to help in addressing visitor, educational, and customer access to these businesses and institutions.

Partnerships with local businesses and nonprofits could also include an overall marketing plan on how best to market the 'gondola' to the benefit of the region; this may include additional monies for specific marketing of identified areas along the Project alignment, in addition to grant-based assistance for anti-displacement strategies.

The Project Sponsor is in the process of and will continue convening stakeholder groups to coordinate on partnerships with local businesses.

During Project construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by Project construction activities. In addition, no displacement of existing residences or housing would occur in connection with the construction and operation of the Project, which would operate primarily over the public ROW and publicly owned property to minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses.

Refer to Attachment E, Project Commitments, to the Metro Board Report for discussion of the Project Commitments, addressing stakeholder groups, support for local businesses and nonprofits, pedestrian access enhancements, park amenities, fares, design and art, an interpretation plan, a parking management plan, privacy glass, and construction.

The Project would provide active pedestrian access enhancements and multi-modal options at mobility hubs along the Project alignment.

As discussed in Section 2.0, Project Description, of the Draft EIR, the Project would provide active transportation connectivity along the Project alignment through pedestrian access enhancements and first/last mile multi-modal options at the mobility hubs proposed for the Chinatown/State Park Station and the Dodger Stadium Station. The overall purpose of the Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region's rapidly growing regional transit system at LAUS, as well as the businesses at El Pueblo and downtown Chinatown. The Project would also provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon.

To facilitate this transportation connectivity, the Project would include pedestrian access enhancements including pedestrian improvements between Metro's L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge, discussed in greater detail below. The Project would also include pedestrian enhancements and drought tolerant landscaping and open space enhancements, including at the Alameda Triangle, the Los Angeles State Historic Park, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to Los Angeles State Historic Park and Elysian Park. Implementation of the Project's Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, and both the Alameda Tower and Alpine Tower will provide additional hardscape and landscape updates around the tower bases.

The Project would facilitate access to parks, including the Los Angeles State Historic Park and Elysian Park.

The Project would provide daily transit service to visitors of the Los Angeles State Historic Park and Elysian Park. The Los Angeles State Historic Park hosts various events throughout the year including craft markets, concerts, movie nights, and festivals. These events attract visitors from the surrounding local communities and throughout the region who can access the park from the Project. While not proposed as part of the Project, the Draft EIR includes an analysis of the State Park's proposed bike and pedestrian bridge as part of Design and Use Option E. The bridge would provide important connections for students at Cathedral High School, and between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Access to Elysian Park, the City's second largest park, comprising 575 acres, would be provided through a mobility hub at the Dodger Stadium Station, where passengers would be able to access a suite of first/last mile multi-modal options.

Consistent with Metro's public art policy, the Project would use local artists to reflect the unique neighborhood culture and history in site-specific artwork.

As discussed in Section 2.0, Project Description, of the Draft EIR, each station could provide an opportunity for site-specific artwork commissioned from artists from the surrounding community, that is reflective of the unique neighborhood culture. The Project has also committed to one "Art Cabin" that could feature artwork commissioned from local artists. Refer to page 106 of the Lighting Study attached to Appendix C, Visual Impact Assessment, of the Draft EIR, for a conceptual, illustrative rendering of the "Art Cabin." As discussed in Section 3.01, Aesthetics, of the Draft EIR, Metro's public art policy mandates that art be displayed throughout Metro's transportation network in order to activate and enliven public spaces that otherwise serve a functional purpose. While not subject to the requirements of the public art policy, the Project would expand the number of opportunities where local artists can display their work, consistent with the public art policy. The Project could also identify additional sites for commissioned murals or art installations along the Project alignment. The Project would create numerous opportunities to collaborate with and showcase local artists, including convening stakeholder groups to coordinate on issues including utilization of local artists and identification of sites along the Project alignment to showcase the work of local artists.

The design of Project components would be inspired by adjacent neighborhood culture and history, consistent with the goals of the City of Los Angels' General Plan Framework Element.

Each component of the Project would be designed to complement and reflect the unique character of the surrounding area, and which would be discussed with identified stakeholder groups. As discussed in Section 2.0, Project Description, and Appendix C, Visual Impact Assessment, of the Draft EIR, the Project would not adhere to a fixed, Procrustean[2] design across the entire system,

[2] "Procrustean" design refers to design that is designed to produce conformity.

but each individual component would be designed to weave seamlessly into the surrounding urban fabric and the characteristics of the surrounding neighborhoods, and the colors and material finishes of each station and junction would be chosen to be complementary to each of their respective sites. As stated in Section 2.0, Project Description, of the Draft EIR, the proposed architectural design employs a simple barrel vault form, which utilizes a hollow structural steel section structure and metal panel assembly to allow the introduction of custom perforation patterns that take cues from the immediate neighborhood culture, while also providing a visual lightness to the form. Likewise, the neutral light-tone grey of each tower would be intended to conform with the surrounding urban environment and will not provide a highly metallic or mirrored finish to minimize glare. Further, as discussed in Appendix C, Visual Impact Assessment, of the Draft EIR, the Project would be consistent with the goals of the City of Los Angeles' General Plan Framework Element regarding urban form and design and would support the Silver Lake – Echo Park – Elysian Valley Community Plan's aim to "provide color, lighting, and surface texture accents and complementary building materials to building walls and facades, consistent with architectural themes of the neighborhood." Moreover, the Project would support the goals and objectives of the City's General Plan Framework to "improve the quality of the public realm through Project design, which would promote accessibility via improved pedestrian pathways that would be complementary and appropriate to the character of the existing buildings in the surrounding area," and the Central City North Community Plan's objective to "enhance the appearance of commercial districts," by selecting color, lighting, surface texture accents, and building materials to complement the architectural themes of each individual neighborhood.