

Airport Metro Connector 96th Street Transit Station

Findings of Fact

State Clearinghouse No. 2015021009



**Findings of Fact
Pursuant to CEQA Guidelines Section 15091
and
Public Resources Code Section 21081**

**Airport Metro Connector
96th Street Transit Station**

November 2016



In Association with:

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Epic Land Solutions
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TABLE OF CONTENTS

1	Introduction	1
2	Organization	1
3	Project Description and Objectives	2
4	Statutory Requirements	2
4.1	Record of Proceedings.....	3
5	Environmental Impacts Found Less than Significant with Implementation of Mitigation Measures	4
5.1	Hazards and Hazardous Materials.....	4
6	Environmental Impacts Found Significant After Implementation of Mitigation Measures..	7
7	Environmental Impacts Found Less than Significant.....	7
7.1	Air Quality	7
7.2	Greenhouse Gas (GHG) Emissions.....	9
7.3	Hazards and Hazardous Materials.....	10
7.4	Land Use and Planning.....	10
7.5	Noise and Vibration.....	11
7.6	Transportation and Traffic.....	13
8	Environmental Effects Found to Have No Impact.....	15
9	Cumulative Impacts	15
9.1	Air Quality	16
9.2	GHG Emissions	16
9.3	Hazards and Hazardous Materials.....	18
9.4	Land Use and Planning.....	20
9.5	Noise and Vibration.....	20
9.6	Transportation and Traffic.....	21
10	Alternatives and Mitigation Measures	23
10.1	Alternatives.....	23
10.2	Findings for Environmentally Superior Alternative	24
10.3	No Project Alternative.....	24
10.4	Findings for the No Project Alternative	25
10.5	Findings for Mitigation Measures.....	25

ABBREVIATIONS/ACRONYMS

ACM	Asbestos-Containing Materials
APM	Automated People Mover
AQMP	Air Quality Management Plan
CEQA.....	California Environmental Quality Act
CMP	Congestion Management Plan
CONRAC.....	Consolidated Rent-A-Car Center
CTA.....	Central Terminal Area
EIR.....	Environmental Impact Report
EIS.....	Environmental Impact Statement
ESA.....	Environmental Site Assessment
FAA.....	Federal Aviation Administration
GHG.....	Greenhouse Gases
ITF	Intermodal Transportation Facilities
LAMP	Landside Access Modernization Program
LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LBP	Lead-Based Paint
LRT	Light Rail Transit
Metro	Los Angeles County Metropolitan Transportation Authority
MMRP.....	Mitigation Monitoring and Reporting Program
RTP.....	Regional Transportation Plan
SCAQMD	South Coast Air Quality Management District
SMP.....	Soil Management Plan
USTs.....	Underground Storage Tanks
VOC.....	Volatile Organic Compounds
VMT.....	Vehicle Miles Traveled

1 INTRODUCTION

The Los Angeles County Metropolitan Transportation Authority (Metro) followed a prescribed process to identify the issues to be analyzed, including seeking input from the public, stakeholders, elected officials, and other affected parties. Implementation of the Airport Metro Connector 96th Street Transit Station (proposed project) will result in less-than-significant environmental impacts with inclusion of certain mitigation measures as part of project approval. As required by the California Environmental Quality Act (CEQA), Metro, in adopting these Findings of Fact, also adopts a Mitigation Monitoring and Reporting Program (MMRP). Metro finds that the MMRP, which is included in Chapter 4.0 of the Final EIR, and made a part of these findings as Attachment C to the November Metro Board Report, meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of measures to mitigate potentially significant effects of the proposed project.

In accordance with CEQA and 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), Metro also finds that the Final Environmental Impact Report (EIR) reflects the Metro's independent judgment as the lead agency for the proposed project.

2 ORGANIZATION

The Findings of Fact is comprised of the following sections:

- Section 3: Contains a brief description of the proposed project and objectives.
- Section 4: Contains the statutory requirements of the findings and a record of proceedings.
- Section 5: Identifies the potentially significant effects which were determined to be mitigated to a less-than-significant level.
- Section 6: Identifies significant impacts, if any, that cannot be mitigated to a less-than-significant level even though all feasible mitigation measures have been identified and incorporated.
- Section 7: Identifies less-than-significant impacts.
- Section 8: Identifies the potential environmental effects that were determined to have no impact.
- Section 9: Discusses potential cumulative impacts.
- Section 10: Describes the alternatives analyzed in the evaluation of the project as well as findings on mitigation measures.

3 PROJECT DESCRIPTION AND OBJECTIVES

Metro is proposing a new multi-modal transportation center with three at-grade light rail transit (LRT) platforms, bus plaza, bicycle hub, pedestrian plaza, passenger vehicle pick-up and drop-off area and Metro transit center/terminal building (“Metro Hub”) to connect passengers between the multiple transportation modes. The west side of Aviation Boulevard would include a 15-foot sidewalk to promote pedestrian accessibility. As part of Los Angeles World Airports (LAWA) Landside Access Modernization Program (LAMP) is proposing a multi-use path on the west side of Aviation Boulevard. Metro and LAWA are coordinating on the potential accommodation of this multi-use path on the west side of Aviation Boulevard south of Arbor Vitae Street. Site amenities would include benches, trash receptacles, bollards or other low level fixtures, bike racks, public art, and signage and wayfinding. The proposed project components would be linked together by a continuous system of elevated mezzanine walkways. The proposed project does not include LAWA's LAMP. For purposes of this EIR, the LAMP is assessed as a related project in the cumulative condition.

The proposed project is being developed to connect the Los Angeles International Airport (LAX) to the regional bus and rail transit system. Given the high volume of daily vehicular trips to and from LAX and the absence of a convenient transit connection, the goal of the proposed project is to increase transit ridership and provide a reliable and convenient transit option to and from LAX along with the regional bus and rail transit system. The three project objectives are:

- Objective #1: Provide a reliable, fast, and convenient connection for passengers traveling between the LAX area and the regional bus and rail transit system.
- Objective #2: Integrate with existing and future transit connections and airport facilities.
- Objective #3: Increase the share of transit trips to and from LAX with minimal impact to airport facilities and surrounding communities and to help reduce air pollution.

4 STATUTORY REQUIREMENTS

CEQA (Public Resources Code Section 21081), and particularly the CEQA Guidelines (the Guidelines) (Title 14 California Code Regulations Section 15091) require that:

“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:

- a. 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.*

- b. 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.*
- c. 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.”*

In short, 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. Project mitigation or alternatives are not required, however, where they are infeasible or where the responsibility for modifying the project lies with another agency (CEQA Guidelines, Section 15091 (a), (b)).

For those significant effects that cannot be mitigated to a less-than-significant level, the public agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment (see Public Resources Code Section 21081 (b)). The CEQA Guidelines state in Section 15093 that, “If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered ‘acceptable.’” No significant and unavoidable environmental impacts have been identified as a result of implementation of the proposed project, therefore a statement of overriding considerations is not needed.

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 proposed 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 the Los Angeles County Metropolitan Transportation Authority, 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 proposed project;
- The Draft EIR dated June 2016;
- All testimony, documentary evidence, and all correspondence submitted in response to the Notice of Preparation during the scoping meeting or by agencies or members of the public during the public comment period on the Draft EIR and responses to those comments (Chapter 3.0, Response to Comments, of the Final EIR);
- The Final EIR dated November 2016 including all appendices thereto and those documents that were incorporated therein by reference;
- The MMRP (Chapter 4.0 of the Final EIR);
- All findings and resolutions adopted by Metro in connection with the proposed 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 proposed project;
- All documents submitted to Metro by agencies or members of the public in connection with development of the proposed project;
- All actions of Metro with respect to the proposed project; and
- Any other materials required to be in the record of proceedings by Public Resources Code Section 21167.6 (e).

5 ENVIRONMENTAL IMPACTS FOUND LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION MEASURES

Below are the determinations of Metro regarding the environmental effects, significant impacts, and corresponding mitigation measures of the proposed project. Determination of findings by Metro follows the list of mitigation measures.

5.1 HAZARDS AND HAZARDOUS MATERIALS

Under CEQA, the proposed project would have a significant impact related to hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create 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;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; and/or
- 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.

Impact. The proposed project would involve the excavation and transport of contaminated soils, which would potentially expose the public to hazardous materials. Underground storage tanks (USTs), clarifiers, sumps, and furnace pits were historically used on the project site in connection with the former Honeywell facility. This site is listed as a Recognized Environmental Condition (REC) on several governmental databases. The disposition of some of the UST is unknown, which would potentially create 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. The project site includes groundwater monitoring wells to monitor volatile organic compound concentrations and migration resulting from residual contamination caused by the former Honeywell facility. These wells would potentially be compromised during the construction process and may need to be relocated. There would also be an impact from the potential to encounter Lead-Based Paint

(LBP) and asbestos during construction activities. The only school located within one-quarter mile of the project site is Bright Star Secondary Charter Academy, which is located approximately 0.1 miles east of the project site. The transport of hazardous construction materials would potentially expose the persons at the school to hazardous substances.

Reference. Section 3.3, Hazards and Hazardous Materials, of the Draft EIR, pages 3.3-16 through 3.3-23.

Mitigation Measures

HAZ-1 Metro shall complete a Phase II Environmental Site Assessment (ESA) at locations on the project site known to have contained hazardous substances and hazardous waste. The Phase II ESA shall include a geophysical survey that confirms the presence or absence of UST(s) and other subgrade features of environmental concern including former hydraulic lifts and clarifiers. The Phase II ESA shall identify if a Soil Management Plan (SMP) would be required.

If prescribed in the Phase II ESA, Metro shall prepare a SMP for identifying, handling, storing and disposing of suspected soils with elevated levels of volatile organic compounds (VOCs). The SMP shall comply with South Coast Air Quality Management District (SCAQMD 1166 (VOC Emissions from Decontamination of Soil)). The SMP shall be prepared by the construction contractor and distributed to construction personnel. If a SMP is required, a Certified Industrial Hygienist shall certify a health and safety plan based on that SMP.

HAZ-2 Metro shall retain a Certified Asbestos Consultant to determine the presence of asbestos and asbestos-containing materials (ACMs) within buildings to be demolished. If asbestos is discovered, a Licensed Asbestos Abatement Contractor shall be retained to safely remove ACM in accordance with the 1994 Federal Occupational Exposure to Asbestos Standards and South Coast Air Quality Management District Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). ACM removal shall be monitored by a Certified Technician.

HAZ-3 Metro shall test for LBP within buildings to be demolished. If LBP is discovered, a licensed lead-based paint/materials abatement contractor shall be retained to safely remove LBP in accordance with the U.S. Department of Housing and Urban Development Lead-Based Paint Guidelines.

HAZ-4 If clarifiers and hydraulic lifts are identified on the project site in the required Phase II ESA in Mitigation Measure **HAZ-1**, Metro shall identify whether there have been any unauthorized releases. If the site assessment identifies a REC, Metro shall coordinate with the appropriate regulatory agencies to remediate hazardous condition(s).

HAZ-5 Metro shall coordinate with the responsible party (Honeywell International Inc.) under the direction of the Regional Water Quality Control Board to monitor

potential disruptions to existing groundwater monitoring wells at 9225 and 9601 Aviation Boulevard during construction activities or operation of the proposed project. If an existing well must be disturbed, Metro shall coordinate with Honeywell International Inc. and the Regional Water Quality Control Board to relocate the monitoring wells.

HAZ-6 Metro shall conduct a soil vapor gas survey of the project site where enclosed structures are planned for the purpose of establishing a baseline for potential indoor vapor concentrations. If the study identifies concentrations that exceed Office of Environmental Health Hazard Assessment California Human Health Screening Levels for soil or soil gas, Metro—in coordination with California Occupational Safety and Health Administration—shall prepare a remediation plan that demonstrates that interior vapor concentrations would be mitigated to below safety standards. This plan shall be prepared prior to building occupancy.

Finding. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effect.

Mitigation Measures **HAZ-1** through **HAZ-3** would ensure that Metro identifies hazardous contamination and prepares an SMP, an asbestos study, and a LBP study to transport and dispose of these materials in accordance with regulatory requirements. These mitigation measures would effectively reduce and regulate the potential hazardous conditions associated with transporting construction materials, reasonably foreseeable upset and accident conditions involving the release of hazardous materials, emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. This includes potential hazardous impacts to the Bright Star Secondary Charter Academy.

A geophysical study specified in Mitigation Measure **HAZ-4** would prevent an accidental release of hazardous materials cause by any unidentified USTs. Mitigation Measure **HAZ-5** would ensure the protection of the existing groundwater wells and prevent any further contamination of groundwater on the project site and at adjoining properties.

The Phase I ESA prepared for the proposed project identified the existing hazardous conditions on the project site. Compliance with recommendations of the Phase I and Mitigation Measures **HAZ-1** through **HAZ-6** would ensure the proposed project would not create a significant hazard to the public or the environment by locating the proposed project on a hazardous materials site.

For the reasons stated above, Metro finds that impacts related to hazards and hazardous materials would be reduced to less than significant.

6 ENVIRONMENTAL IMPACTS FOUND SIGNIFICANT AFTER IMPLEMENTATION OF MITIGATION MEASURES

The Draft EIR does not identify impacts that would result in significant or potentially significant impacts after the implementation of mitigation measures. Metro finds that no impacts were found significant after implementation of mitigation measures.

7 ENVIRONMENTAL IMPACTS FOUND LESS THAN SIGNIFICANT

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

7.1 AIR QUALITY

The proposed project would have a significant impact related to air quality, if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors) (discussed under Section 9, Cumulative Impacts);
- Expose sensitive receptors to substantial pollutant concentrations; and/or
- Create objectionable odors affecting a substantial number of people.

Impact. Air quality impacts would not occur during the construction or operational phases of the proposed project and impacts would be less-than-significant.

Reference. Draft EIR Section 3.1, Air Quality, pages 3.1-17 through 3.1-26 and Draft EIR Chapter 5.0, Cumulative Impacts, pages 5-11 and 5-12.

Mitigation Measures. None required.

Findings. The Air Quality Management Plan (AQMP) is the applicable air quality plan, and the emissions forecasting is based on projected population and employment growth. The proposed project does not contain a residential component and would not introduce population growth to the region. Operation of the proposed project would result in minimal employment growth through the creation of small retail spaces; a majority of the project site would be dedicated to the plaza and platform areas. The proposed project was included in the Regional Transportation Plan (RTP) and would be consistent with the assumptions upon which the AQMP was devised. The proposed project would consolidate bus and rail transit services in the LAX area and provide pedestrian access to the facilities. This regional connectivity to the transit network would be consistent with regional and local air quality

reduction goals to increase transit ridership. The proposed project would be required to comply with all applicable SCAQMD rules and regulations that are in effect at the time of development, and would not conflict with or obstruct implementation of the AQMP.

Construction emissions would be generated by equipment, trucks, and worker vehicles. Emissions of air pollutants that would result from construction of the proposed project were quantified using the California Emission Estimator Model. The analysis showed that regional and localized construction emissions would not exceed the SCAQMD significance thresholds. In addition, Metro has a Green Construction Policy, which includes Tier 4 emission standards for off-road diesel-powered construction equipment greater than 50 horsepower and restricting idling to a maximum of five minutes. The project contractor would be required to comply with Metro's Green Construction Policy.

Air pollutant emissions associated with long-term operation of the proposed project were quantified for both stationary (building envelope and utilities) sources and mobile (buses and passenger vehicles) sources. Mobile sources emissions associated with operation of the proposed project include exhaust and brake and tire wear emissions from changes in bus route vehicle miles traveled (VMT) to and from the new station location, regional changes in highway VMT resulting from transit improvements and reconfiguration of local circulation patterns, and vehicle trips to the pick-up and drop-off area along Aviation Boulevard. Mobile source emissions were quantified using EMFAC2014, the California Air Resources Board-recommended model for calculating estimates of on-road mobile source emissions. The analysis showed that operational emissions would not exceed the SCAQMD significance thresholds. The proposed project would result in a less-than-significant impact related to exposing sensitive receptors to substantial pollutant concentrations.

The proposed project would utilize super-compliant architectural coatings as designated by the SCAQMD to reduce emissions of odorous chemicals. Given existing auto traffic from major and minor arterials adjacent to the project site, any odor impacts from the construction phase are not anticipated to be significant. Any emissions during the construction phase that create odors for nearby sensitive receptors would be addressed by enforcement of SCAQMD Rule 402 (Nuisance), which prohibits any emissions that cause injury, detriment, nuisance or annoyance to a considerable number of people. Land uses and industrial operations commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Operation of the proposed project would include a new multi-modal transportation center with light rail platforms, a bus plaza, and pedestrian and bicycle amenities to connect LAX to Metro's regional transit system and is therefore, not anticipated to create objectionable odors.

For the reasons stated above, Metro finds that these potential air quality impacts are less than significant.

7.2 GREENHOUSE GAS (GHG) EMISSIONS

The proposed project would have a significant impact related to GHG emissions if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Impact. The proposed project would result in a less-than-significant impact related to GHG emissions and consistency with GHG reduction plans.

Reference. Section 3.2, Greenhouse Gas Emissions, of the Draft EIR, pages 3.2-14 through 3.2-23.

Mitigation Measures. None required.

Findings. Sources of temporary GHG emissions associated with construction include off-road heavy duty equipment and on-road motor vehicle travel to and from the project site. Operational GHG emissions associated with the proposed project would be generated through electricity demand and utilities (indirect as the sources are part of other entities) of the new facilities, changes in local bus routes and vehicle trips by passengers and LAX employees creating additional vehicle miles traveled (direct) and the private vehicle activity at the new pick-up and drop-off along Aviation Boulevard (direct). The operational GHG emissions can generally be divided into stationary (facility) sources and mobile (vehicular) sources. Emissions of air pollutants that would result from construction of the proposed project were quantified using the California Emission Estimator Model. Mobile source emissions were quantified using EMFAC2014, the California Air Resources Board-recommended model for calculating estimates of on-road mobile source emissions. The analysis showed that proposed project emissions would be less than the CEQA baseline condition.

Relevant GHG reduction plans, policies, and regulations adopted by Metro include the Countywide Sustainability Planning Program, the Climate Action and Adaptation Plan, the Energy Conservation and Management Plan, and the Green Construction Policy. The proposed project would incorporate strategies to reduce energy demand and GHG emissions through promotion of alternative energy vehicle use, minimizing building electricity consumption, and decreasing water use and wastewater effluent. The proposed project would be consistent with Metro, regional, and state GHG reduction policies.

For the reasons stated above, Metro finds that these potential GHG emissions impacts are less than significant.

7.3 HAZARDS AND HAZARDOUS MATERIALS

The proposed project would have a significant impact related to hazards and hazardous materials if it would:

- 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 the project result in a safety hazard for people residing or working in the project area;
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Impact. The proposed project would result in a less-than-significant impact related to safety hazards associated with airports, emergency response plans, and wildfires.

Reference. Section 3.3, Hazards and Hazardous Materials, of the Draft EIR, pages 3.3-23 through 3.3-25.

Mitigation Measures. None required.

Findings. The project area is located within the LAX Airport Influence Area and is subject to Federal Aviation Administration (FAA) height restrictions. The proposed project and the past, present, and reasonably probable future projects within the Airport Influence Area are legally required by the Code of Federal Regulations to file a Form 7460, Notice of Proposed Construction or Alteration, with the FAA to make an airspace determination. This determination ensures compliance with applicable federal guidelines and eliminates the potential for an impact. The proposed project is not within the proximity of a private airstrip. The proposed project would not modify emergency/disaster routes. Per state and local regulations, emergency vehicle access would be maintained at all times during construction and operation of the proposed project. The proposed project is not within or in close proximity to a Wildfire Hazard Area and would not be subject to wildland fires.

For the reasons stated above, Metro finds that these potential hazards and hazardous materials impacts are less than significant.

7.4 LAND USE AND PLANNING

The proposed project would result in a significant impact related to land use and planning if it would:

- Physically divide an established community; and/or

- Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Impact. The proposed project would result in a less-than-significant impact related to dividing an established community and consistency with land use policies or regulations.

Reference. Section 3.4, Land Use & Planning, of the Draft EIR, pages 3.4-13 through 3.4-21.

Mitigation Measures. None required.

Findings. Situated in a largely commercial-industrial area, the project site is bounded by roadways to the north, east and south and a Metro-owned railroad right-of way to the west. It does not adjoin any established residential communities. Further, the project site does not provide access to any residential areas or community facilities. The closest residences are located across Aviation Boulevard to the east in Manchester Square, which has been declining in residential units over the past ten years. The majority of these properties have been or are in the process of being relocated by LAWA as part of their Aircraft Noise Mitigation Program. The project proposes various access and circulation improvements such as signalized lights, crosswalks, pedestrian paths and driveways; however, vehicular ingress and egress is from the existing roadways thereby maintaining the general land use pattern and circulation configuration in the surrounding area.

Project implementation would not require any zone changes or plan amendments and the proposed project is compatible with applicable land use plans and policies. The proposed project would be consistent with the Regional Transportation Plan, City of Los Angeles General Plan, including the Mobility Element, and other state and local land use plans. In addition, the project site is located within the Airport Influence Area and is subject to FAA height restrictions. Metro is legally required by the Code of Federal Regulations to file a Form 7460, Notice of Proposed Construction or Alteration, with the FAA to make an airspace determination. This determination would ensure compliance with applicable federal guidelines.

The project site is not a critical habitat for threatened or endangered species and does not contain any candidate, sensitive or special status species. The proposed project would not conflict with any habitat conservation plan or natural community conservation plan.

For the reasons stated above, Metro finds that these potential Land Use and Planning impacts are less than significant.

7.5 NOISE AND VIBRATION

The proposed project would result in a significant impact related to noise and vibration if it would result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; and/or
- Exposure of persons residing or working in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, to excessive noise levels.

Impact. The proposed project would result in a less-than-significant impact related construction and operational noise and vibration; permanent and temporary ambient noise levels; and noise levels associated with airports.

Reference. Section 3.5, Noise and Vibration, of the Draft EIR, pages 3.5-15 through 3.5-23.

Mitigation Measures. None required.

Findings. Noise levels would vary throughout the construction process depending on the activity and location. The Draft EIR determined that noise levels at nearby sensitive land uses would not exceed applicable significance thresholds. In addition, construction activities would comply with Section 41.40 of the Los Angeles Municipal Code and design criteria established by Metro (e.g., well-maintained equipment with effective noise control devices, such as mufflers).

The proposed project would generate operational noise associated with bus and passenger vehicle movements on and off the project site and light rail activity at the station. An analysis of combined noise levels at sensitive receptors was completed using the Federal Transit Administration guidance. The proposed project would increase noise levels by 1.0 decibels or less at sensitive receivers, and noise levels would not exceed the Federal Transit Administration impact criteria for moderate or severe impacts.

Construction activity can generate varying degrees of vibration, depending on the construction procedure and the construction equipment used. The proposed project would not involve impact or sonic pile driving or large vibratory rollers. Based on the anticipated equipment mix, there would be the potential for impacts to occur within 37 feet of the project site. The nearest sensitive receptors are single family residences located at 9608 – 9612 Aviation Boulevard, approximately 100 feet to the east of the project site. Therefore, the proposed project would result in a less-than-significant impact related to construction vibration.

Operational vibration would be generated by light rail activity on the Crenshaw/LAX and Metro Green LRT lines and bus activity on the roadway network. The proposed transit station would result in lower train speeds than assessed in the Crenshaw/LAX Transit Project

Environmental Impact Report/Environmental Impact Statement (EIR/EIS) because the trains will need to slow to stop at the station. Trains generate less vibration at lower speeds and vibration levels would be less than presented for the Crenshaw/LAX Transit Project, and would not result in a new impact that was not disclosed in that EIR/EIS. Regarding bus vibration, the Federal Transit Administration has stated that the rubber tires and suspension systems of buses provide vibration isolation, making it unusual for buses to cause ground-borne noise or vibration problems. Most problems with bus-related vibration can be directly related to a pothole, bump, expansion joint, or other discontinuity in the road surface. The roadway system near the project is in good condition, and project-related buses would not generate perceptible vibration.

The project site is located in the LAX noise contours and has the potential to expose people working in the project area to excessive noise levels. However, because the project site is located near LAX, existing ambient noise levels are relatively high due to aircraft noise and, the ambient noise levels are not considered excessive. The proposed project is not within the proximity of a private airstrip.

For the reasons stated above, Metro finds that impacts related to noise and vibration would be less than significant.

7.6 TRANSPORTATION AND TRAFFIC

The proposed project would result in a significant impact related to transportation and traffic if it would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase in hazards due to a design feature or incompatible uses;
- Result in inadequate emergency access; and/or
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Impact. The proposed project would result in a less-than-significant impact related to transportation and traffic.

Reference. Section 3.6, Transportation and Traffic, of the Draft EIR, pages 3.6-15 through 3.6-29.

Mitigation Measures. None required.

Findings. Construction activities will be primarily limited to and contained within the project site, with the exception of the addition of traffic signals at the main project driveway on Aviation Boulevard and the potential installation of a second signal at the southern entry in Access Option 2. All construction and worker vehicles are anticipated to be accommodated on site throughout construction. During operation, the average increased delay at intersections would be less than the intersection traffic operations significance thresholds established by the City of Los Angeles Department of Transportation and other local jurisdictions. Construction and operational activities would be consistent with applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system in the future condition.

The Congestion Management Plan (CMP) is a state-mandated program administered by Metro's 2010 CMP that provides a mechanism for coordinating land use and development decisions. A detailed CMP analysis is not necessary because the proposed project would not add more than 150 trips to the freeway monitoring locations nor would it add more than 50 trips to the intersection monitoring locations.

The project site is within the LAX Airport Influence Area, which is subject to FAA height restrictions, but is not within a Runway Protection Zone or safety zone. The proposed project is a surface transportation and general development project and would not change air traffic patterns. Thus, the proposed project would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure and reduce regional congestion.

Changes to the roadway network would comply with standard engineering practices and design standards, and design elements would not increase roadway hazards or impede emergency access. Since the proposed project would not include a substantial new population center and is located in close proximity to four fire station, there would be no need to build a new or expand an existing fire station to serve the proposed project or add additional personnel or equipment to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

The proposed project is being developed to connect LAX to the regional transit system and is included in the Metro's 2009 Long Range Transportation Plan and the Measure R Expenditure Plan to finance new transportation projects and programs. The proposed project would consolidate bus transit services in the LAX area and provide pedestrian and bicycle amenities. In addition, the proposed project would have the capacity to accommodate both the existing and future passengers presently using the LAX City Bus Center and the Aviation/LAX transit center. The facility will be capable of handling the consolidated bus service with room for expanded frequency or additional lines in the future.

For the reasons stated above, Metro finds that impacts related to transportation and traffic would be less than significant.

8 ENVIRONMENTAL EFFECTS FOUND TO HAVE NO IMPACT

The proposed project would have either no impact or no impact when incorporating applicable laws and regulations related to the following issues: Aesthetics, Agricultural Resources, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, Energy Resources, and Growth Inducing Effects. The Draft EIR also included that there would be no potential for impacts associated with Hazards and Hazardous Materials (proximity to a private airstrip), Land Use and Planning (conflicts with habitat or natural community conservation plans) and Noise and Vibration (noise exposure from private airstrips).

Impact. No significant impacts would occur.

Reference. Chapter 4.0, Other CEQA Considerations, of the Draft EIR, pages 4-4 through 4-30.

Mitigation Measures. None required.

Findings. Metro finds that the proposed project would not result in impacts to the above issues and no mitigation measures are required.

9 CUMULATIVE IMPACTS

The cumulative impacts analysis in the Draft EIR included projects that may occur in the project vicinity within the same timeframe as the proposed project. As such, the cumulative impact analysis considers the combined effect of the proposed project with improvements proposed by LAWA as part of the LAMP, the Crenshaw/LAX Line, Aviation/Century station, and privately developed projects in the project vicinity. Refer to Chapter 5.0, Cumulative Impacts, of the Draft EIR for a list of projects in the cumulative condition, including details related to LAWA's LAMP.

As stated in CEQA Guidelines Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the proposed project evaluated in the EIR. Further discussion is not warranted for environmental issue areas. Metro finds that there is no potential for a cumulative impact related to:

- Aesthetics
- Agricultural Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hydrology and Water Quality
- Mineral Resources
- Population and Housing
- Public Services
- Recreation

- Utilities and Service Systems
- Energy Resources

9.1 AIR QUALITY

AQMP Consistency. The AQMP is the applicable air quality plan, and the emissions forecasting is based on projected population and employment growth. Projects that are considered to be consistent with the AQMP would not interfere with attainment because the associated growth is included in the projections utilized in the formulation of the AQMP. However, the AQMP was prepared in 2012 and it is possible that projects developed or planned since the completion of the modeling would be inconsistent with the AQMP. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact. The proposed project is included in the growth forecasts and is consistent with the AQMP. The proposed project would consolidate bus and rail transit services in the LAX area and provide pedestrian street access to the facilities. This regional connectivity to the transit network would be consistent with regional and local air quality reduction goals to increase transit ridership. The proposed project would be required to comply with all applicable SCAQMD rules and regulations that are in effect at the time of development, and would not conflict with or obstruct implementation of the AQMP. For the reasons stated above, Metro finds that the proposed project's incremental contribution to the significant cumulative impact associated with AQMP consistency is not cumulatively considerable.

Air Quality Standards Violations, Exposure of Sensitive Receptors to Substantial Pollutant Concentrations, and Nonattainment Pollutant Emissions. The South Coast Air Basin is currently designated nonattainment for ozone and particulate matter. Emissions generated by the proposed project combined with past, present, and reasonably probable future projects could impede attainment efforts or result in locally significant pollutant concentrations. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact. Project emissions would not exceed significance thresholds and, therefore, would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. For the reasons stated above, Metro finds that the proposed project's incremental contribution to the significant cumulative impact associated with violations of air quality standards, substantial pollutant concentrations is not cumulatively considerable.

Odors. Neither the project area nor the proposed project includes land uses identified by the SCAQMD as commonly associated with odor complaints. For the reasons stated above, Metro finds that the proposed project combined with other past, present, and reasonably probable future projects would not create a significant cumulative impact.

9.2 GHG EMISSIONS

GHG Emissions and Consistency with GHG Emission Reduction Plans. Through Assembly Bill 32, the State of California has acknowledged that GHG emissions are a Statewide impact.

Emissions generated by the proposed project combined with past, present, and reasonably probable future projects could contribute to this impact. Both the proposed project and the LAMP have been approved as consistent with transportation and sustainability efforts within the City of Los Angeles. The proposed project and the LAMP together would encourage alternative modes of transportation to passenger vehicles, and improve the ability of people at existing and future transit oriented development to access LAX using the regional transit system. The proposed project would implement several defined features for sustainability, including LEED Silver minimum rating for the building structures and reduced potable water demand by using recycled water for landscaping and installing low-flow plumbing fixtures. The GHG analysis determined that the proposed project would not result in significant impacts and would be consistent with applicable GHG plans, policies, and regulations. For the reasons stated above, Metro finds that the proposed project's incremental contribution to the significant cumulative impact associated with GHG emissions is not cumulatively considerable.

9.3 HAZARDS AND HAZARDOUS MATERIALS

Transport, Use or Disposal of Hazardous Materials. There are multiple contaminated properties near the project site and the project site is known to have contaminated soils. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact. The proposed project includes Mitigation Measures **HAZ-1** through **HAZ-4**, which would reduce impacts to less than significant levels. In addition, the proposed project would be required to comply with all applicable rules and regulations related to contaminated soils, asbestos-containing materials, and lead-based paint. Therefore, Metro finds that the proposed project's incremental contribution to the significant cumulative impact associated with construction activities is not cumulatively considerable.

Regarding operational activities, the proposed project combined with past, present, and reasonably probable future projects would involve the occasional use, storage and disposal of common hazardous materials. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact. The proposed project would be regulated by the California Division of Occupational Safety and Health, the City of Los Angeles Fire Code and all other federal, state and local regulations. All hazardous materials would be required to be contained, stored and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. For the reasons stated above, Metro finds that the proposed project's incremental contribution to the significant cumulative impact associated with operational activities is not cumulatively considerable.

Release of Hazardous Materials from Upset or Accident Conditions. The proposed project combined with past, present, and reasonably probable future projects could create a cumulative impact associated with disturbance of a natural gas line and groundwater monitoring wells, as well as other Recognized Environmental Conditions. The proposed project would be required to comply with all laws, rules and regulations. In addition, the proposed project would incorporate Mitigation Measures **HAZ-1** through **HAZ-6**, which would reduce impacts to less than significant levels. For the reasons stated above, Metro finds that the proposed project's incremental contribution to the significant cumulative impact associated with construction activities is not cumulatively considerable.

Regarding operational activities, the proposed project combined with past, present, and reasonably probable future projects would involve the occasional use, storage and disposal of common hazardous materials that could be released during upset or accident conditions. The proposed project would be required to comply with all laws, rules and regulations that control hazardous materials. For the reasons stated above, Metro finds that the proposed project's incremental contribution to the significant cumulative impact associated with operational activities is not cumulatively considerable.

Hazardous Conditions at a School, Safety Hazard Near a Private Airstrip, and Wildland Fires. The cumulative condition does not include a school located within one-quarter mile of the

project site, the project site is not located near a private airstrip, and project site is not subject to wildland fires. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Located on a site that would create Significant Hazard to the Public or Environment. The project site and adjacent land uses contain several existing hazardous materials contaminations and existing groundwater monitoring wells are located on the project site. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact. Hazardous materials site remediation and hazardous materials themselves are well regulated. The proposed project would be developed on contaminated site but would comply with all regulations related hazardous materials removal and monitoring. Compliance with Mitigation Measures **HAZ-1** through **HAZ-6** would ensure the proposed project would not create a significant hazard to the public or the environment. This mitigation and remediation would also eliminate the project's potential to contribute to the cumulative impact. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Safety Hazard near a Public Airport. The project area is located within the Airport Influence Area and is subject to FAA height restrictions. The proposed project and the past, present, and reasonably probable future projects within the Airport Influence Area are legally required by the Code of Federal Regulations to file a Form 7460, Notice of Proposed Construction or Alteration, with the FAA to make an airspace determination. This determination ensures compliance with applicable federal guidelines and eliminates the potential for a cumulative impact. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Safety Hazard near a Private Airstrip. The proposed project and the Related Projects are not within the proximity of a private airstrip. Therefore, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Emergency Plans. The proposed project and the Related Projects would not modify emergency/disaster routes. Per state and local regulations, emergency vehicle access would be maintained at all times during construction and operation of the proposed project and Related Projects. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Wildland Fires. Exhibit D of the City of Los Angeles Safety Element indicates that no portion of the project area or the surrounding area is within or in close proximity to a Wildfire Hazard Area (City of Los Angeles, 1996). For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

9.4 LAND USE AND PLANNING

Division of an Established Community. Manchester Square is the only residential community that would be affected by the development of the Related Projects and currently consists of sparsely distributed multi-family residences, a small number of single-family homes and an elementary school east of the proposed project. This area is proposed to be developed by LAWA for the Automated People Mover (APM), the Intermodal Transportation Facilities (ITF) East/Consolidated Rent-A-Car Center (CONRAC) with adjacent collateral land use development. Thus, in the cumulative condition, the remaining residences and Bright Star Secondary Charter Academy would be relocated and thus considered a significant cumulative impact. Therefore, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact. The proposed project would have no direct or indirect effect on this change. Given the scale and nature of the proposed project as a transit station with light rail platforms, bus bays and ancillary facilities, the overall contribution of the proposed project to land use change would not be significant. For the reasons stated above, Metro finds that the proposed project's incremental contribution to that significant cumulative impact is not cumulatively considerable.

Compatibility with Land Use Plans and Policies. Project implementation would not require any zone changes or plan amendments and the proposed project is compatible with applicable land use plans and policies. Accordingly, impacts on existing land use plans and policies would be less than significant. Due to the nature of the development of the uses proposed by the Related Projects (i.e., primarily airport-serving commercial uses) in an area largely designated for LAX, LAX-related, and a mix of industrial and commercial uses; significant cumulative impacts are not anticipated. For the reasons stated above, Metro finds that proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Habitat Conservation. Neither the site nor the cumulative impact study area are identified as critical habitat for threatened or endangered species and does not contain any candidate, sensitive or special status species. Neither the proposed project nor the Related Projects would conflict with any habitat conservation plan or natural community conservation plan. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

9.5 NOISE AND VIBRATION

Exposure to Excessive Noise Levels. The potential exists for construction activities associated with the proposed project to combine with past, present, and reasonably probable future projects to create a cumulative noise impact at land uses near the project site. The project-related construction noise increase would be approximately 0.5 decibels, and would not likely evoke a community reaction. For the reasons stated above, Metro finds that the proposed project's incremental contribution to a potential significant cumulative impact is not cumulatively considerable.

Regarding operational activities, the cumulative condition includes the proposed project and Related Projects, including LAWA's LAMP. Noise generating components of the LAMP include operation of the APM and increased traffic volume due to parking and roadway improvements. The Draft EIR determined that the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact related to increased operational noise levels. A quantitative analysis demonstrated that the proposed project would constitute a small portion of operational noise in the cumulative condition. The majority of noise in the cumulative condition would be associated with LAX-related land uses, roadway noise not related to the proposed project, the Crenshaw/LAX Line, and the LAMP components. For the reasons stated above, Metro finds that the proposed project's incremental contribution to a potential significant cumulative impact is not cumulatively considerable.

Exposure to Excessive Ground-Borne Vibration. Vibration impacts typically occur within 25 feet of the source. In the cumulative condition, the nearest sensitive receptor to the project site would be the Travelodge Hotel LAX. Neither the project site nor the projects within 25 feet of the Travelodge Hotel LAX would be located within 25 feet of the Travelodge Hotel LAX. Regarding operational activities, vibration is a localized and instantaneous effect and would not differ along Aviation Boulevard in the project or cumulative condition. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Exposure to Excessive Noise Levels Associated with Public Airports. The potential for a cumulative impact related to excessive public airport noise is site specific. The Draft EIR assessed LAX-related noise levels at the project site, which were determined to be less than significant. This potential impact would be independent of Related Projects. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Exposure to Excessive Noise Levels Associated with Private Airstrips. The proposed project and Related Projects are not within the proximity of a private airstrip. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

9.6 TRANSPORTATION AND TRAFFIC

Circulation System. Construction of the proposed project and Related Projects within the study area may include temporary intermittent lane closures, although this is unlikely to be necessary on Aviation Boulevard due to the center turn median on Aviation Boulevard. In the event of road closures due to simultaneous construction activities, the proposed project combined with past, present, and reasonably probable future projects could result in a cumulative impact. To the extent feasible, construction management plans for both the proposed project and LAWA's LAMP will be coordinated to maintain access for nearby land uses, limit lane closures, and maintain safe and adequate pedestrian protection. For the

reasons stated above, Metro finds that the proposed project's incremental contribution to a potential significant cumulative impact is not cumulatively considerable.

Regarding operational activities, cumulative conditions with Related Projects within the study area that affect local roadway circulation include the CONRAC, East and West ITFs, the APM, roadway improvements throughout the cumulative impact study area and collateral private development on the east side of Aviation Boulevard. This scenario analyzes the cumulative forecasted conditions for the year 2035, reflecting regional growth and transportation improvements identified in the Regional Transportation Plan, as well as the proposed projects within the study area. Cumulative conditions with and without the proposed project were used to determine traffic operations with the anticipated growth and transportation improvements in the cumulative impact study area. The cumulative condition also includes rerouted bus transit trips and passenger vehicle pickup and drop-off trips. The analysis demonstrated that there would be no exceedances of the applicable intersection traffic operations significance thresholds. For the reasons stated above, Metro finds that proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

CMP Analysis. The CMP is a state-mandated program administered by Metro's 2010 CMP that provides a mechanism for coordinating land use and development decisions. A detailed CMP analysis is not necessary because the proposed project would not add more than 150 trips to the freeway monitoring locations nor would it add more than 50 trips to the intersection monitoring locations. For the reasons stated above, Metro finds that proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Air Traffic Patterns. The proposed project and Related Projects are surface transportation and general development projects and would not change air traffic patterns. The overall intentions of the proposed project and Related Projects are to satisfy existing and future transit demand in the airport vicinity. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Traffic Hazards. None of the transportation system improvements proposed by the project would introduce new safety hazards at intersections or along roadway segments. Roadway improvements, including driveway access and crosswalks, would be designed to ensure the safety of all roadway users. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Emergency Access. Construction activity in the cumulative condition may include temporary, intermittent lane closures on adjacent streets and emergency access could slightly affect emergency access. These impacts would be negligible and temporary and the proposed project would be required to prepare a Construction Staging and Traffic Management Plan that would address traffic control and emergency access during construction. For the reasons

stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Regarding operational activities, changes to the roadway network would comply with standard engineering practices and design standards. Design elements would not increase roadway hazards or impede emergency access. There are four fire stations located in proximity to the project site, there would be no need to build a new or expand an existing fire station to serve the proposed project because the proposed project would not include a substantial new population center. In addition, the County of Los Angeles Sheriff's Department and the City of Los Angeles Police Department, including the Los Angeles Airport Police Division, would patrol the project area on a regular basis. Response times would be minimally affected by new development due largely to the fact that most officers respond to calls for service from the field and not from the station. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

Public Transit, Bicycle or Pedestrian Facilities. The proposed project and LAWA's LAMP are being developed to enhance regional bus and rail connectivity and connectivity to LAX. The Metro Hub and ITFs would link the multiple modes of transportation. The bicycle hub on the project site would accommodate up to 150 bicycles in a secure location and additional space for up to 50 bicycles would be provided for short-term parking. The LAMP would also include bicycle facilities, a multi-use path along west side of Aviation Boulevard and other bicycle network improvements. The proposed project's transport modes would connect directly via vertical circulation elements (i.e., stairs, escalators, and elevators) to an elevated mezzanine level. The elevated walkways and interconnected mezzanines would allow safe transfers between the proposed project components and the LAMP APM station. The cumulative condition would have the capacity to accommodate both the existing and future passengers, as it would have room for expanded frequency or additional lines in the future. Under the LAMP, the LAX FlyAway service may be consolidated onto the project site to provide a single location for bus transfers. For the reasons stated above, Metro finds that the proposed project combined with past, present, and reasonably probable future projects would not create a cumulative impact.

10 ALTERNATIVES AND MITIGATION MEASURES

10.1 ALTERNATIVES

Pursuant to Section 15060, a preliminary review of the proposed project was conducted and it was determined that the appropriate level of environmental review involved the preparation of an EIR. During the course of preparing this Draft EIR, it was determined that the proposed project would have no significant effects with the implementation of mitigation measures. Although the proposed project meets the criteria for the preparation of a Mitigated Negative Declaration (Section 15070), Metro decided to continue preparing the Draft EIR to facilitate greater public participation during the environmental review process. CEQA requires an analysis of alternatives to the proposed project to reduce or eliminate significant impacts

associated with project development. Alternatives were considered that would avoid or reduce potential impacts of the proposed project to a less than significant level.

As indicated previously, mitigations measures are required to reduce the proposed project's hazardous materials impact to a less-than-significant level. To avoid or substantially reduce this impact would require the relocation of the proposed project to an alternate site where there would be no or substantially reduced contamination and remediation requirements. While the proposed project's hazardous materials impact would be less than significant with mitigation; this analysis is provided to address alternate sites and avoid hazardous materials impacts without requiring mitigation or create a new impact that would not occur if the proposed project were built. In addition, the proposed project requires approximately 4.5 acres to accommodate the bus facility. As discussed in Chapter 6.0, Alternatives, of the Draft EIR, there are no viable alternate sites to provide a feasible alternate location for the proposed project. Therefore, the only alternative considered in the Draft EIR was the No Project Alternative, as discussed in Section 10.3 of this Findings of Fact.

10.2 FINDINGS FOR ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. As described in the Draft EIR, the No Project Alternative has been found to have the least amount of environmental impacts and is the environmentally superior alternative. If the No Project Alternative is identified as the environmentally superior alternative, the next best environmentally superior alternative must be identified.

The degree to which an alternative meets the objectives of a proposed project is discussed as part of an alternatives analysis pursuant to CEQA. The proposed project consists of series of significant transportation elements and associated infrastructure components, including the LRT platforms, to be served by the Crenshaw/LAX Line and a service extension of the Metro Green Line, a bus plaza and terminal facility for Metro and municipal bus operators, bicycle hub with secured parking for up to 150 bicycles, pedestrian plaza, passenger vehicle pick-up and drop-off area and Metro transit center/terminal building (“Metro Hub”) that connects passengers between the various modes of transportation. These project components are intended to provide a reliable and convenient transit option to and from LAX and the regional transit system. The stated objectives of the proposed project are to provide a reliable, fast and convenient connection for passengers traveling between the LAX area and the regional bus and rail transit system; integrate with existing and future transit connections and airport facilities; and increase the share of transit trips to and from LAX with minimal impact to airport facilities and surrounding communities and to help reduce air pollution.

10.3 NO PROJECT ALTERNATIVE

The No Project Alternative is required by Section 15126.6 of the CEQA Guidelines and would not include development related to the proposed project. The proposed project site would continue to be occupied by the existing rental car facilities, CNG fueling station and towing

storage yard. The site would continue to be characterized by low-rise industrial structures (totaling approximately 19,000 square feet) and paved surfaces. The Crenshaw/LAX Line would continue to be located on the western boundary of the proposed project site.

The No Project Alternative would include a number of differences from the existing conditions analysis. Specifically, the Crenshaw/LAX Line is scheduled for completion in 2019 and will be operating with or without development of the proposed project. Also, it is reasonably foreseeable that the No Project Alternative would include the development of a bus facility at the Aviation/Century station to provide better connectivity between bus and rail transit services. The Crenshaw/LAX Line, including the Aviation/Century station, the extension of Metro's Green Line and a proposed bus facility, were studied in the Crenshaw/LAX Transit Corridor Project EIS/EIR, which was certified by the Metro Board in September 2011 and issued a Record of Decision from the Federal Transit Administration in December 2011. Therefore, impacts of the proposed bus facility at the Aviation/Century station are not included in this assessment. The bus facility at Aviation/Century station would not be built if the proposed project is built. Most importantly, the Aviation/Century station would not provide a convenient connection to other future airport development projects such as the Airport People Mover (APM) discussed in Chapter 5.0, Cumulative Impacts, of the Draft EIR.

10.4 FINDINGS FOR THE NO PROJECT ALTERNATIVE

Metro finds that specific economic, legal, social, technological, or other considerations, make infeasible the No Project Alternative identified in the Draft EIR (CEQA Guidelines Section 15091(a)(3)). Although the No Project Alternative would involve fewer environmental impacts and provide a regional transit connection to LAX through the Aviation/Century station it would not be integrated with the future APM and airport facilities included in the LAMP, as discussed in Chapter 5.0, Cumulative Impacts. Locating the bus facility at the Aviation/Century station would require patrons to walk to the proposed APM adjacent to the project site. This could require additional pedestrian and bicycle facilities along Aviation Boulevard. The project site was selected because of its strategic location and ability to link to existing and foreseeable transit projects. Therefore, despite being the environmentally superior to the proposed project, the No Project Alternative would not fully satisfy the project objectives.

10.5 FINDINGS FOR MITIGATION MEASURES

Metro has considered all of the mitigation measures recommended in the Draft EIR. None of the recommended measures that are within the Metro's jurisdiction have been rejected by Metro. To the extent that these Findings conclude that various proposed mitigation measures outlined in the Draft EIR are feasible and have not been modified, superseded or withdrawn, Metro hereby binds itself to implement or, as appropriate, require implementation of these measures. These Findings of Fact, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when Metro adopts a resolution approving the proposed project. The mitigation measures are referenced in the MMRP adopted concurrently with these Findings of Fact and will be effectuated through the process of constructing and implementing the proposed project.