Attachment C

Los Angeles County
Metropolitan Transportation Authority

Findings of Fact and Statement of Overriding Considerations

GOLD LINE EASTSIDE TRANSIT CORRIDOR PHASE 2

Prepared for
Los Angeles Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

April 2024

Metro

Findings of Fact and Statement of Overriding Consideration

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Prepared for:
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1. INTRODUCTION

1.1 Overview

This document presents the findings required by the California Environmental Quality Act (CEQA) (Public Resources Code [PRC], § 21000 et seq.) for each of the significant environmental effects identified in the Final Environmental Impact Report (FEIR) (SCH No. 2010011062) that was prepared for the Los Angeles County Metropolitan Transportation Authority (Metro) Eastside Transit Corridor Phase 2 Project (Project). In this document, "the Project" refers to the locally preferred alternative (LPA), which is Alternative 3 with the Atlantic/Pomona Station Option, the Montebello At-Grade Option, and the Montebello maintenance and storage facility (MSF), as described in detail in the Recirculated Draft EIR and refined in the Final EIR. The Project, including the refinements in the Final EIR, is discussed in more detail in Section 1.6 and all alternatives analyzed in the Recirculated Draft EIR and Final EIR are discussed in Section 3 of this document.

This document also includes a Statement of Overriding Considerations, pursuant to CEQA, which states the reasons why the benefits of the Project outweigh the Project's unavoidable significant adverse effects.

1.2 Statutory Requirements

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

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 on the environment that would occur if the project is approved or carried out 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.

    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.

    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 EIR.

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 Guidelines Section 15093(a) states that, "If the specific economic, legal, social, technological, or other benefits of a Project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" Section 15093(b) of the CEQA Guidelines requires for those significant impacts that cannot be avoided or substantially lessened, the lead agency is required to state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

Section 21081.6 of CEQA also requires public agencies to adopt a mitigation monitoring and reporting program (MMRP) for assessing and ensuring the implementation of proposed mitigation measures. Pursuant to Section 21081.6, public agencies are required to provide that the measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures.

Pursuant to the requirements listed above, this Findings of Fact and Statement of Overriding Considerations presents the required findings which are supported by substantial evidence in the record. Additionally, this Findings of Fact and Statement of Overriding Considerations includes a statement of overriding considerations that explains the specific reasons why the social, economic, legal, technical, or other beneficial aspects of the Project outweigh the Project's unavoidable adverse environmental impact and why the Lead Agency is willing to accept such impact. This statement is based on the Recirculated Draft EIR and Final EIR and/or other substantial evidence in the record.

The mitigation measures identified in the MMRP for the Project to avoid or reduce the significant effects on the environment are identified within this Findings of Fact and Statement of Overriding Considerations. The Project MMRP is provided under separate cover.

1.3 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 (NOP) and other public notices issued by Metro in conjunction with the Project
- The Recirculated Draft EIR dated June 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 Recirculated Draft EIR, and responses to those comments (Chapter 4, Responses to Comments, of the Final EIR)
- The Final EIR dated April 2024 including all associated appendices and documents that were incorporated by reference
- The MMRP (Chapter 5 of the Final EIR)
- 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
- Any other materials required by PRC Section 21167.6(e) to be in the record of proceedings

1.4 Document Organization

The CEQA Findings of Fact and Statement of Overriding Considerations was prepared to meet the latest CEQA Statutes and Guidelines. The document is organized into the following sections:

- Section 1. Introduction
  - Section 1.1 Overview
  - Section 1.2 Statutory requirements
  - Section 1.3 Record of proceedings
  - Section 1.4 Document Organization
  - Section 1.5 Public and Agency Outreach
  - Section 1.6 Project Summary
- Section 2. Statement of Significant Impacts and Required Findings
  - Section 2.1 Environmental Impacts Found to be Significant and Unavoidable
  - Section 2.2 Environmental Impacts Found to be Less Than Significant with Mitigation
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- Section 3. Alternatives and Mitigation Measures
  - Section 3.1 Alternatives
  - Section 3.2 Design Options and MSF Options
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  - Section 3.4 Findings for Mitigation Measures
- Section 4. Findings on Changes to the Recirculated Draft EIR
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- Section 5. Statement of Overriding Considerations
  - Section 5.1. Significant and Unavoidable Impacts
  - Section 5.2. Overriding Considerations
  - Section 5.3. Conclusion

1.5 Public and Agency Outreach

Metro has complied with CEQA and the CEQA Guidelines during the preparation of the EIR for the Project. The Recirculated Draft EIR, dated June 2022, was prepared after soliciting input from the public, responsible agencies, and affected agencies through the Recirculated Draft EIR scoping process. The "scoping" of the Recirculated Draft EIR was conducted using several of the tools available under CEQA. In accordance with Section 15063 of the CEQA Guidelines, a NOP was prepared and distributed to the State Clearinghouse, responsible agencies, affected agencies, and other interested parties on May 31, 2019. The NOP was posted in the Los Angeles County Clerk office for 30 days; and comments on the NOP were accepted through July 31, 2019. Metro conducted six public Scoping Meetings in June 2019 to receive formal public comments on the Build Alternatives and their potential impacts to the environment and quality of life. The NOP was also submitted to the California Office of Planning and Research (State Clearinghouse) to officially solicit participation in determining the scope of the Recirculated Draft EIR. Information requested and input provided during the NOP comment period regarding the scope of the Recirculated Draft EIR are included in the Recirculated Draft EIR.

The Recirculated Draft EIR was circulated for a 60-day public review and comment period starting on Thursday, June 30, 2022, and concluding on Monday, August 29, 2022. The public review period was conducted pursuant to CEQA and its implementing guidelines, which requires a 45-day review period. The document and the Notice of Completion (NOC) were distributed to the California Office of

Planning and Research (State Clearinghouse). Relevant agencies also received copies of the document. A Notice of Availability (NOA) was distributed to agencies and community stakeholders. The NOA informed them of where they could view the document and how to comment. Hard copies of the Recirculated Draft EIR (and electronic copies of the supporting technical reports) were made available for public review at the Metro Headquarters and local libraries. An electronic copy of the document was also posted online, and hard copies were made available by request. The NOA was filed with the County Clerks on June 30, 2022. A total of 297 written comment letters were received on the Recirculated Draft EIR.

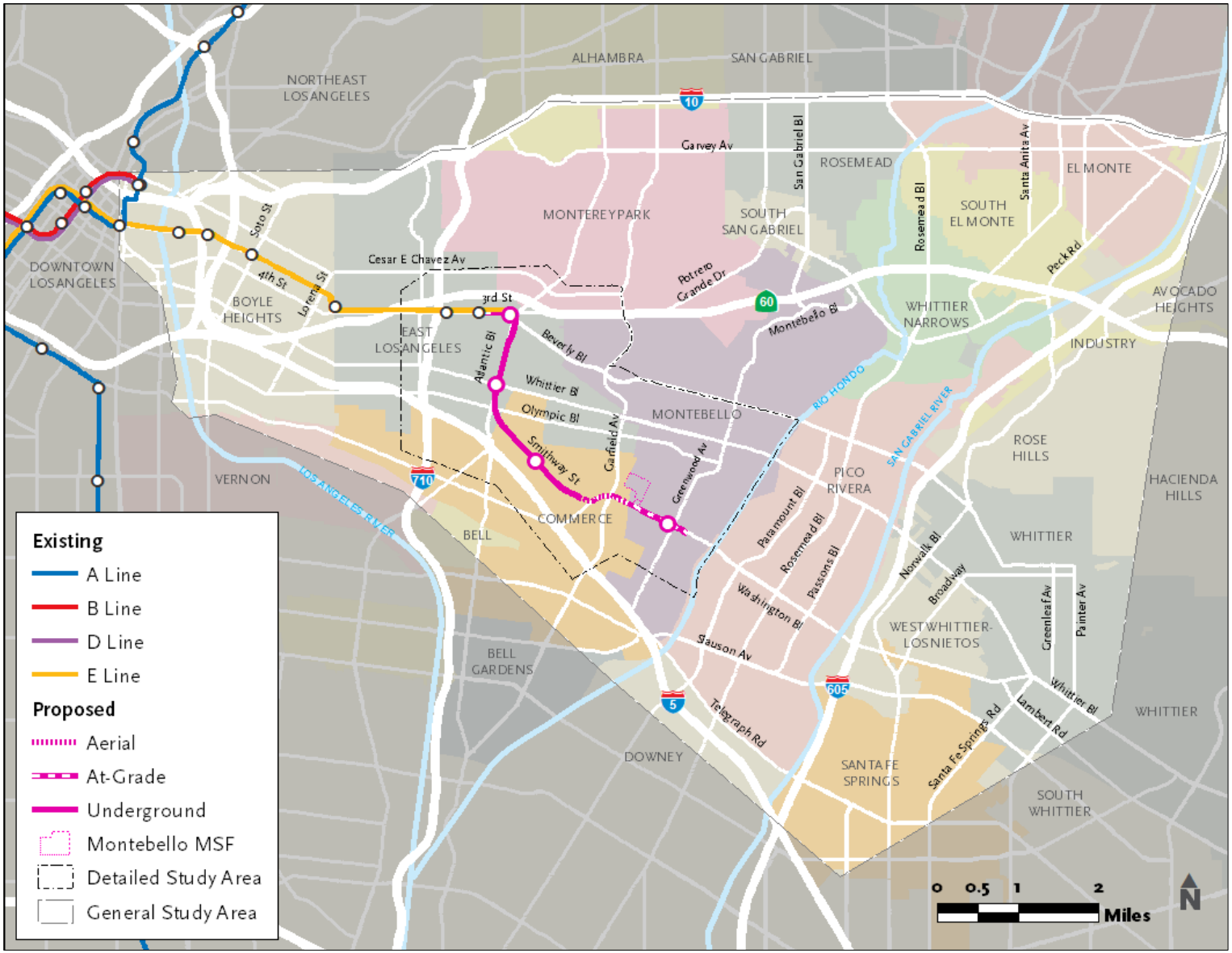
A Final EIR has been completed and includes the Recirculated Draft EIR, comments received on the Recirculated Draft EIR, written responses to the comments received, a list of persons and agencies commenting on the Recirculated Draft EIR, and revisions and changes to the Recirculated Draft EIR.

1.6 Project Summary

1.6.1 Project Location and Setting

The Project would extend the Metro E Line (formerly Metro L [Gold] Line) approximately 4.6 miles east from the current terminus at Atlantic Boulevard to an at-grade terminal station at the Greenwood station in the city of Montebello. The alignment is located in the unincorporated Los Angeles County community of East Los Angeles and the cities of Commerce and Montebello.

For purposes of describing the Project, two study areas have been defined. The General Study Area (GSA) is regional in scope and scale, whereas the Detailed Study Area (DSA) encompasses an area approximately 0.5-miles to 2-miles from the Project alignment's centerline. The purpose of the GSA is to establish the study area for environmental resources that are regional in scope and scale, such as regional transportation, including vehicle miles traveled (VMT) and regional travel demands, population, housing, and employment. The DSA establishes a study area to evaluate environmental resources that are more sensitive to the physical location of the Project. The GSA and DSA are shown in **Figure 1**.



Source: Metro; CDM Smith/AECOM JV, 2024.

Figure 1. Project Alignment and Study Areas

1.6.2 Project Purpose and Objectives

East Los Angeles County faces an increasing number of mobility challenges due to high population, employment growth, and a constrained transportation network. The existing terminus of Metro E Line is located approximately four miles east of Downtown Los Angeles at Atlantic Boulevard and Pomona Boulevard in the unincorporated community of East Los Angeles. There is no rail connection for communities located to the east. Many residents within the GSA, defined in Section 1.6.1, encounter long travel delays connecting to and from downtown Los Angeles and beyond. If unaddressed, these mobility challenges pose a risk to future population and economic growth, including challenges for transit dependent populations, pedestrian and bicycle safety, capacity constraints on existing infrastructure, inefficiency of goods movement, poor air quality conditions, and other environmental considerations. If no action is taken, these transportation challenges will continue to grow. In support of the goals documented in Metro's 2020 Long Range Transportation Plan (LRTP) and Metro's Vision 2028 Strategic Plan, the Project Objectives include the following:

- Enhance regional connectivity and air quality goals by extending the existing Metro E Line further east from the East Los Angeles terminus
- Provide mobility options to increase accessibility and convenience to and from eastern Los Angeles County
- Improve transit access to activity centers and employment within eastern Los Angeles County that would be served by the Project
- Accommodate future transportation demand resulting from increased population and employment growth
- Enable jurisdictions in eastern Los Angeles County to address their transit-oriented community goals and provide equitable development opportunities
- Improve accessibility and connectivity to transit-dependent communities

Project Objectives are met to varying extents by creating benefits, both to the region and to local communities. By extending the existing Metro E Line into eastern Los Angeles County, the Project will enhance access and mobility and provide connectivity to other destinations along Metro's regional system. Further, the Project will reduce travel times and the need for transfers within the system by providing a one-seat ride via the Regional Connector. By serving concentrated areas of employment, activity centers and residential communities, the Project will support transit-oriented community goals and address the mobility needs of transit-dependent populations. The Project will provide new and faster transit options which will help lead to equitable development and in-fill growth opportunities throughout eastern Los Angeles County.

1.6.3 Project Description

1.6.3.1 Project

As shown in **Figure 1**, the Project would extend the Metro E Line approximately 4.6 miles and include a relocated open-air shallow underground Atlantic station and three new stations: Atlantic/Whittier (underground), Commerce/Citadel (underground), and Greenwood (at-grade). The Project would have approximately 3.0 miles of underground, 0.5 miles of aerial, and 1.1 miles of at-grade alignment.

An MSF in the city of Montebello and other ancillary facilities, including overhead catenary system (OCS), tracks, cross passages, ventilation structures, traction power substations (TPSS), track crossovers, emergency generators, radio tower poles and equipment shelters, and other facilities, would also be constructed along the Project alignment.

1.6.3.2 Guideway Alignment

The guideway would begin at the eastern end of the existing East Los Angeles Civic Center Station, transitioning from at-grade to underground at the intersection of South La Verne Avenue and East 3rd Street. The guideway would then turn south and run beneath Atlantic Boulevard to approximately Verona Street and Olympic Boulevard. The underground guideway would then curve southeast, running under Smithway Street near the Citadel Outlets in the city of Commerce. After crossing Saybrook Avenue, the guideway would daylight from underground to an aerial configuration to avoid disrupting existing BNSF Railway tracks. The aerial guideway would continue east then merge into the center median of Washington Boulevard at Gayhart Street. At Yates Avenue, the guideway would transition from aerial to an at-grade configuration, run along Washington Boulevard to Carob Way, and then continue east in an at-grade configuration. The alignment would terminate at the at-grade Greenwood station in the city of Montebello with trail tracks that cross Montebello Boulevard and extend just to the east of Carob Way.

1.6.3.3 Maintenance and Storage Facility

The Project includes an MSF in the city of Montebello shown in **Figure 1**. The MSF would provide equipment and facilities to clean, maintain, and repair rail cars, vehicles, tracks, and other components of the system. The MSF would enable storage of light rail vehicles (LRV) that are not in service and would connect to the mainline with one lead track. Additionally, the MSF would provide office space for Metro rail operation staff, administrative staff, and communications support staff and would be the primary physical employment centers for rail operation employees, including train operators, maintenance workers, supervisors, administrative personnel, security personnel and other roles.

The MSF is north of Washington Boulevard and south of Flotilla Street between Yates Avenue and Vail Avenue. The site is approximately 30 acres and is bounded by Vail Avenue to the east, a warehouse structure along the south side of Flotilla Street to the north, Yates Avenue to the west, and a warehouse rail line to the south. Additional acreage would be needed to accommodate the lead track and construction staging. The lead tracks to the MSF would be in an at-grade configuration from Washington Boulevard, paralleling Vail Avenue, and would remain at-grade to connect to the MSF. Through-access on Acco Street to Vail Avenue would be eliminated and cul-de-sacs would be provided on each side of the lead tracks to ensure that access to businesses in this area is maintained. Acco

Street is an undivided two-lane road and is functionally classified as a local street under the California Road System.

The MSF would require acquisition of several properties with commercial and industrial uses. The parcels within the MSF and in the vicinity are classified as Heavy Manufacturing under the city of Montebello zoning code. A significant portion of the MSF is occupied by an industrial/commercial paving business.

1.6.3.4 Ancillary Facilities

The Project would require a number of additional elements to support vehicle operations, including but not limited to the OCS, tracks, crossovers, cross passages, ventilation structures, TPSS, train control houses, electric power switches and auxiliary power rooms, communications rooms, radio tower poles and equipment shelters, and the MSF. The Project would have an underground alignment of approximately 3 miles in length between La Verne and Saybrook Avenue. Per Metro's Fire Life Safety Criteria, ventilation shafts and emergency fire exits would be installed along the tunnel portion of the alignment. These would be located at the underground stations or public right-of-way (ROW). The Project alignment would travel along the median of the roadway for most of the route. The precise location of ancillary facilities would be determined in a subsequent design phase.

1.6.3.5 Proposed Stations

The following stations would be constructed under the Project:

- Atlantic/Pomona station – The Atlantic/Pomona station would relocate the existing at-grade Atlantic Station to a shallow underground open-air station with two side platforms and a canopy. This station would be located beneath the existing triangular parcel bounded by Atlantic Boulevard, Pomona Boulevard, and Beverly Boulevard. The existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve this station. In coordination with Metro Art, efforts would be made, as feasible, to relocate the artwork from the existing Atlantic Station to the new Atlantic/Pomona station.

- Atlantic/Whittier – This station would be underground with a center platform located beneath the intersection of Atlantic and Whittier Boulevards in East Los Angeles. Parking would not be provided at this station. Access to the station would be provided via an entrance located on the northwest corner of the Whittier Boulevard and Atlantic Boulevard intersection.

- Commerce/Citadel – This station would be underground with a center platform located beneath Smithway Street near the Citadel Outlets in the city of Commerce. Parking would not be provided at this station. Access to the station would be provided via an entrance located south of Smithway Street west of Gaspar Avenue.

- Greenwood – This station would be at-grade with a center platform on Washington Boulevard located just west of Greenwood Avenue in the city of Montebello. This station would provide a surface parking facility near the intersection of Greenwood Avenue and Washington Boulevard.

Station public area designs and amenities would comply with the Systemwide Station Design Standards and the Metro Art Program Policy as contained in the Metro Rail Design Criteria (MRDC) and Architectural Standard and Directive Drawings, as required by the Metro Systemwide Station

Design Standards Policy. Design elements include, but are not limited to, station pin signs, entrance portal canopies, platform canopies, plaza paving and landscaping, station interior architectural finishes and furnishings, lighting, passenger telephones, sound attenuation features, customer information panels, real-time information digital screens, fare gates, fare vending machines, integrated public art, security cameras, and bike racks and lockers. Escalators and elevators would be located in aerial and underground stations. Station entry portals would be implemented at underground stations. Station access would be compliant with the Americans with Disabilities Act (ADA) and would also have bicycle and pedestrian connections. Bicycle and pedestrian connections to the stations would comply with the requirement for a seamless project boundary as described in the Metro First/Last Mile Guidelines and in the MRDC. Details regarding most of these items, including station area planning and urban design, would be determined at a later phase in compliance with Metro design standards as referenced above.

1.6.3.6 Design Refinements

Following the Metro Board of Directors' selection of the LPA (Project) in December 2022 and receipt and review of public comments on the Recirculated Draft EIR, the conceptual engineering of the Project continued to progress. This has resulted in the consideration of refinements to the overall project design and performance that are identified and analyzed in Final EIR, including new project components and optional changes that will be further considered as the engineering advances. The Design Refinements which are evaluated in Chapter 2 of the Final EIR are not considerably different from the Project (Alternative 3 and the design options) analyzed in the Recirculated Draft EIR. The Design Refinements would not result in any new significant impact or a substantial increase in the severity of a significant impact than identified for Alternative 3 and the design options in the Recirculated Draft EIR.

The Design Refinements consist of the following:

Guideway Refinement – This is an optional refinement of the aerial and at-grade guideway configurations. Under the optional Guideway Refinement, the aerial tracks would transition from aerial to an at-grade configuration further east than the base Project between Vail Avenue and Maple Avenue. The lead tracks to the MSF would be in an aerial configuration from Washington Boulevard and then would transition to at-grade as the track approaches the MSF. This would result in 0.9 miles of aerial alignment as opposed to 0.5 miles under the base Project.

Crossover Refinements – Crossovers are mechanical track installations along a double-track alignment that allow trains traveling in either direction on either track to move to the other track and continue traveling in the same direction without stopping. The operation and construction of crossovers were considered in the evaluation of the guideway alignment in the Recirculated Draft EIR. The Crossover Refinements consist of three new or adjusted crossover locations that were not previously evaluated. Two locations are project components and one is an optional refinement. One additional new crossover was evaluated in the Final EIR for Alternative 1 that is south of the Alternative 1 terminus at Lambert station that is not applicable to the Project.

- Atlantic/Whittier Station crossover (Project component) – a new underground crossover just north of the proposed Atlantic/Whittier station. This crossover increases the size of the underground station footprint compared to the station as analyzed in the Recirculated Draft EIR.

- Greenwood crossovers (Project component) – at-grade crossover west of Greenwood station and crossover east of Greenwood station that is west of the crossover location analyzed in the Recirculated Draft EIR.

- Maravilla crossover (Optional) – a new at-grade crossover in the existing Line E tracks on 3rd Street between Arizona Avenue and Kern Avenue, west of East L.A. Civic Center Station. The Maravilla crossover is located outside of the alignment but within the DSA studied in the Recirculated Draft EIR.

1.6.3.7 Description of Construction

Construction of the Project would include a combination of elements. The major construction activities include guideway construction (at-grade, aerial, underground); decking and tunnel boring for the underground guideway; station construction; demolition; utility relocation and installation work; street improvements including sidewalk reconstruction and traffic signal installation; retaining walls; light rail transit (LRT) operating systems installation including TPSS and OCS; parking facilities; the MSF; and construction of other ancillary facilities.

In addition to adhering to regulatory requirements, the development of the Project would employ conventional construction methods, techniques, and equipment. All work for development of the LRT system would conform to accepted industry specifications and standards, including Best Management Practices (BMP). Project engineering and construction would, at minimum, be completed in conformance with applicable regulations, guidelines, and criteria, including, but not limited to, MRDC (Metro 2018), Architectural Standard and Directive Drawings, California Building Code, Metro Operating Rules, and Metro Sustainability Principles.

Project construction is expected to last approximately 60 to 84 months. Construction activities would shift along the corridor so that construction activities should be relatively short in duration at any one point, although construction of the open-air and each underground station would last approximately 12 to 18 months and construction of the at-grade station would last approximately 6 months. Most construction activities would occur during daytime hours. For specialized construction tasks, it may be necessary to work during nighttime hours to minimize traffic disruptions. Traffic control and pedestrian control during construction would follow local jurisdiction guidelines and the Manual of Uniform Traffic Control Devices standards. Typical roadway construction traffic control methods and devices would be employed including the use of signage, roadway markings, flagging, and barricades to regulate, warn, or guide road users. Properties adjacent to the Project's alignment would be used for construction staging. The laydown and storage areas for construction equipment and materials would be established in the vicinity of the Project within parking facilities, and/or on parcels that would be acquired for the proposed stations and the MSF. Construction staging areas would be used to store building materials and construction equipment, assemble the tunnel boring machine (TBM), provide temporary storage of excavated materials, and locate temporary field offices for the contractor.

1.6.3.8 Description of Operations

The operating hours and schedules for the Project would be comparable to the weekday, Saturday and Sunday, and holiday schedules for the Metro E Line (effective 2019). It is anticipated that trains would operate every day from 4 am to 1:30 am. On weekdays, trains would operate approximately every 5 to 10 minutes during peak hours, every 10 to 12 minutes mid-day and until 8 pm, and every 15 minutes in the early morning and after 8 pm. On weekends, trains would operate every 10 minutes from 9 am to

6:30 pm, every 15 minutes from 7 am to 9 am and from 6:30 pm to 7:30 pm, and every 20 minutes before 7 am and after 7:30 pm. These operational headways are consistent with Metro design requirements for future rail services.

2. STATEMENT OF SIGNIFICANT IMPACTS AND REQUIRED FINDINGS

This section discusses the significant impacts and mitigation measures identified for the Project and makes findings for all significant impacts identified in the Final EIR. The Recirculated Draft EIR and Final EIR focus on the Project's effect on the environment that Metro, as the CEQA Lead Agency and project proponent, has determined to be significant in accordance with CEQA regulations. As described in Chapters 3 and 4 of the Recirculated Draft EIR and Chapter 2 of the Final EIR, the Project could result in significant environmental impacts in the following issue areas, prior to mitigation:

- Biological Resources
- Cultural Resources
- Geology, Seismicity, Soils, and Paleontological Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise and Vibration
- Transportation and Traffic
- Tribal Cultural Resources

The impacts for all resource areas analyzed in the Final EIR are presented based on the following impact determinations:

- Significant and Unavoidable
- Less than Significant with Mitigation
- Less than Significant
- Not to be impacted

The following information is provided for each topic:

- *Impact* – specific description of the environmental effects identified in the Final EIR.
- *Reference* – notation of the specific section in the Recirculated Draft EIR, Final EIR, or other information source that support the findings.

- *Mitigation Measures* – mitigation measures (if any) identified in the Final EIR to avoid or reduce impacts determined to be significant.

- *Findings* – the findings made in accordance with Section 21081 of CEQA which identifies the significance of the environmental impacts after mitigation (as applicable) and identifies the applicable of the three possible findings for each significant impact, as provided in Section 15091 of the CEQA Guidelines.

In the making the findings, Metro has considered the project measures identified in the Recirculated Draft EIR and as revised in the Final EIR, which are components of the project, including design features, best management practices, or other measures required by law and/or permit approvals. The impacts, the mitigation measures, and Metro's findings identified herein would be the same for the base Project and the Project with optional Guideway Refinement and/or the Project the optional Maravilla Crossover. The only difference between the base Project and the Project with the optional Guideway Refinement is a 0.4 mile difference in aerial and at-grade guideway configuration, the configuration of the lead tracks to the MSF, and the location of the aerial to at-grade guideway transition. The only difference between the base Project and the Project with the optional Maravilla crossover is a slightly larger area of construction/disturbance, a slight increase in temporary disruption of traffic, transit, bicycle and pedestrian accesses, and reconstruction of a small portion of existing track.

2.1 Environmental Impacts Found to be Significant and Unavoidable

2.1.1 Geology, Seismicity, Soils, and Paleontological Resources

2.1.1.1 Paleontological Resources

The Project would have a significant impact related to geology, seismicity, soils, and paleontological resources with respect to the following significance threshold:

- Impact GEO-5: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact

The Project is located in paleontologically sensitive geologic units where paleontological resources are likely to be present. The loss of these resources could occur during Project construction from soil disturbance, including excavation, tunneling, and construction of underground stations.

Monitoring for paleontological resources can be implemented during excavation where the excavation site is reasonably accessible and visible, where soil spoils can be reasonably observed, and where construction methods do not completely destroy any potential specimen. However, monitoring is not feasible during tunnel boring activities because the tunnel boring machine (TBM) operates by grinding

material as it moves forward, making it impossible to preserve fossils or bones. The tunnel boring for the Project would occur in sediments with a high sensitivity for paleontological resources, and thus, construction using the TBM would result in significant direct impacts on paleontological resources. The impact would be the same for the Project with the optional Guideway Refinement and/or the Project with the optional Maravilla crossover.

Reference

Section 3.6.6.5, Impact GEO-5: Paleontological Resources, of the Recirculated Draft EIR, pages 3.6-42 through 3.6-43. Section 2.4.6.5 and Section 3.2.8 of the Final EIR.

Mitigation Measures

Mitigation measures listed below would reduce impacts on paleontological resources to less than significant in areas that can be monitored. However, there is no known way to monitor or mitigate tunnel boring impacts on paleontological resources because of how the TBM operates. Implementation of the Project would result in significant and unavoidable impacts related to paleontological resources. There are no feasible measures that would mitigate these impacts to less than significant.

MM GEO-1: The contractor shall retain a qualified paleontologist and a qualified paleontological monitor to carry out the following tasks: Prepare a Paleontological Resource Mitigation and Monitoring Plan (PRMMP) that includes identification and mapping of the areas of high sensitivity to be monitored during construction. These areas are defined as all areas within the Older alluvium in the project site where planned excavation will exceed three feet below the surface or three feet into undisturbed sediments and all areas within the Younger alluvium in the project site where planned excavation will exceed 10 feet below the surface or 10 feet into undisturbed sediments. The qualified paleontologist shall supervise the qualified paleontological monitor to monitor excavation in areas identified as likely to contain paleontological resources with the exception of TBM excavation, where monitoring is infeasible. The qualified paleontologist shall retain the option to reduce monitoring if, in his or her professional opinion, sediments being monitored are previously disturbed. Monitoring may also be reduced if the potentially fossiliferous units are determined to have low potential to contain fossil resources.

MM GEO-2: Monitoring for paleontological resources and salvage of fossils shall occur in compliance with the Paleontological Resource Mitigation and Monitoring Plan (PRMMP) required by mitigation measure MM GEO-1. The PRMMP shall specify that the qualified paleontologist and the qualified paleontological monitor are equipped to salvage fossils and samples of sediment as they are unearthed to avoid construction delays and empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Since Older alluvium yields small fossil specimens (microvertebrate fossils) likely to go unnoticed during typical large-scale paleontological monitoring, the PRMMP shall identify that matrix samples shall be collected and processed to determine the potential for small fossils to be recovered prior to substantial excavations in those sediments. If this sampling indicates that these units do possess small fossils, a matrix sample of 6,000 pounds shall be collected at various locations, to be specified by the paleontologist, within the construction area. These matrix samples shall also be processed for small fossils.

MM GEO-3: The Paleontological Resource Mitigation and Monitoring Plan (PRMMP) required under mitigation measure MM GEO-1 shall specify procedures for the discovery, recovery, preparation, and analysis of significant paleontological resources encountered during construction, in accordance with standards for recovery, reporting, and curation established by the Society of Vertebrate Paleontology (SVP). The qualified paleontologist shall make certain that recovered specimens be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrate and vertebrate fossils.

MM GEO-4: Curation of specimens shall occur in compliance with the Paleontological Resource Mitigation and Monitoring Plan (PRMMP) required by mitigation measure MM GEO-1. The PRMMP shall identify criteria for identifying specimens to be curated into a professional accredited museum repository with permanent retrievable storage. A report of findings, with an appended itemized inventory of specimens, shall be prepared. The report and inventory, when submitted to the professional accredited museum repository, shall signify completion of the program to mitigate impacts to paleontological resources.

Finding

Significant impacts on paleontological resources in areas that can be monitored would be mitigated through implementation of mitigation measures MM GEO-1 through MM GEO-4 requiring a qualified paleontologist to monitor excavation in areas identified as likely to contain paleontological resources and making certain that recovered specimens be prepared for permanent preservation and curated into an appropriate repository in compliance with the PRMMP. However, for the reasons stated above regarding use of a TBM, there is no known way to monitor tunnel boring impacts on paleontological resources. Metro finds that the impact on paleontological resources during tunnel boring would be significant and no feasible mitigation measures exist to mitigate these impacts. Thus, for areas that can be monitored, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1 that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on paleontological resources; for areas where the TBM would be used and monitoring is not feasible, Metro adopts CEQA Finding 3 that specific technological considerations make mitigating the impact on paleontological resources from the TBM infeasible.

2.2 Environmental Impacts Found to be Less Than Significant with Mitigation

2.2.1 Biological Resources

2.2.1.1 Protected Species

The Project would have less than significant impacts with mitigation measures related to biological resources with respect to the following significance threshold:

- Impact BIO-1: 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 CDFW or USFWS?

Impact

The Project is located in an area where migratory birds could nest in street trees. Potential impacts on nesting birds could result from increased noise or vibration associated with ongoing operations, such as increased concentration of human activity at stations. However, the Project would run under and along existing roads in a highly urbanized environment, which already experiences noise and vibration levels that likely discourage birds from nesting close to the proposed alignment. Therefore, the Project would not likely alter existing nesting behavior within the Biological Resource Study Area (BRSA).

However, disturbances to vegetation and structures providing bird nesting habitat during the bird nesting season could adversely affect migratory birds. Disturbances to vegetation and structures providing bird nesting habitat during the bird nesting season, without mitigation, could result in significant impacts on migratory birds.

The analysis found that the Project would not impact special-status species or bats under Impact BIO-1. Special status species would not be impacted because of the developed nature of the BRSA and lack of suitable habitat along the alignment.

Reference

Section 3.3.6.1, Impact BIO-1: Protected Species, of the Recirculated Draft EIR, pages 3.3-20 through 3.3-21; Section 2.4.3.1 and Section 3.2.5 of the Final EIR.

Mitigation Measures

The following mitigation measure reduce impacts related to migratory birds to less than significant.

MM BIO-4: Prior to the implementation of construction activities (e.g., demolition of structures, excavation, grading, construction of access roads) that would result in removal of or disturbances to vegetation and structures providing bird nesting habitat, prior to pile driving near active bird nests, and prior to tree trimming during the maintenance period, the following shall occur:

- If construction is scheduled to occur during the bird nesting season (generally February 15 through September 15, and as early as January 1 for some raptors), vegetation that will be impacted by the Project shall be removed in advance of the construction activities and outside the nesting season, if feasible, to avoid take of birds, raptors, or their eggs. If this is not feasible, prior to the implementation of construction activities, one nesting bird survey shall be conducted 72 hours prior to construction or maintenance that shall remove or disturb suitable nesting habitat during the breeding season. The survey shall be performed by a biologist with experience conducting breeding bird surveys. The biologist shall prepare a survey report within 24 hours of conducting the survey, documenting the presence or absence of any active nest of a migratory bird. If an active nest is located, an appropriate no-work buffer shall be established and vegetation removal within the buffer shall be postponed until the nest is vacated and

juveniles have fledged (minimum of six weeks after egg-laying) and when there is no evidence of a second attempt at nesting. Buffers may be as large as 300 feet for migratory bird nests and 500 feet for raptor nests.

Finding

Significant impacts on migratory birds would be mitigated by requiring nesting bird surveys to be performed prior to implementation of construction and maintenance activities that disturb areas providing bird nesting habitat, and by requiring that, if any active nests are located, a no-work buffer would be established until the nest is vacated. For the reasons stated above, Metro finds that, through implementation of mitigation measure MM BIO-4, the Project's impacts related to migratory birds, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on biological resources with respect to Impact BIO-1.

2.2.2 Cultural Resources

2.2.2.1 Historical Resources

The Project would have less than significant impacts with mitigation measures related to cultural resources with respect to the following significance threshold:

- Impact CUL-1: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

Impact

Construction of the Project has the potential to cause vibrations and ground settlement adjacent to the Golden Gate Theater, is a historic property, which could result in a significant impact. Vibration levels from construction activities along the proposed alignment would include the use of a TBM, bulldozers, dump trucks, and vibratory rollers. The use of impact pile drivers would be avoided whenever possible to eliminate the potential of vibration impacts (such as minor cosmetic structural damage) at nearby sensitive receptors. As a result of the preliminary construction vibration estimates, construction activities are predicted to exceed the Federal Transit Administration (FTA) vibration damage impact criteria at the closest residences and commercial properties. Therefore, without mitigation, a significant impact on the Golden Gate Theater would occur.

The analysis found that the Project would result in less than significant impacts or no impacts on the following historic resources: the Vail Field Industrial Addition, Pacific Metals Company, Goodyear Warehouse, Greenwood Elementary School, South Montebello Irrigation District Building, and the William and Florence Kelly House.

Construction of the Project would acquire six contributing resources to the Vail Field Industrial Addition, which is potential historic district, resulting in the physical demolition of these district contributors and would impair the significance of the potential historic district, by removing in an adverse manner some of the physical characteristics of the historical resource that conveys its significance. The six contributing resources would be acquired primarily as ROW acquisition to enable

construction of the guideway. However, the demolition of these peripheral contributors would leave the core of the potential historic district intact with a sufficient number of contributors with characteristics to still convey its historical significance and would be eligible for listing in the California Register of Historical Resources (CRHR). The Project would not have a substantial adverse change on the Vail Field Industrial Addition and would result in a less than significant impact.

The alignment would be aerial near two historic properties located in an industrial setting, the Pacific Metals Company building and the Goodyear Warehouse. The new aerial structure would introduce a new visual element but would not limit views or change the historic character of the buildings. The alteration of the setting with the new visual element of the aerial structure would not materially impair its significance and would result in a less than significant impact.

The alignment and Greenwood station would be at-grade near three historic properties: the Greenwood Elementary School, the South Montebello Irrigation District Building and William and Florence Kelly House. These resources would not be physically demolished, destroyed, relocated, or altered. Due to the considerable distance between the Greenwood Elementary School and Washington Boulevard, no visual impacts on this historical resource or its setting are anticipated from the at-grade alignment or station and there would be no impact. The at-grade alignment would introduce new visual, audible, and atmospheric elements within the immediate surroundings of the South Montebello Irrigation District Building and William and Florence Kelly House. The setting of the buildings is modern and adjacent to a major road. Therefore, the setting of these buildings has already been extensively modified and includes modern infrastructure and uses. Although the Greenwood station would introduce a permanent visual element directly in front of the South Montebello Irrigation District Building and the William and Florence Kelly House, the relative height of the raised platform will not block any significant views of these historical resources, such as the view of the façades from the sidewalk or the westbound side of Washington Boulevard. The existing setting would be left largely intact. Because the setting of the building is already compromised by modern development and activities, the significance of the South Montebello Irrigation District Building and the William and Florence Kelly House would not be materially impaired.

Reference

Section 3.4.6.1, Impact CUL-1: Historical Resources, of the Recirculated Draft EIR, pages 3.4-38 through 3.4-40; Section 2.4.4.1 and Section 3.2.6 of the Final EIR.

Mitigation Measures

The following mitigation measure reduce impacts on the Golden Gate Theater to less than significant.

MM CUL-1: Protection Measures – Differential Settlement/Vibration/Tunnel Boring Machine (TBM) Specifications for CVS/Golden Gate Theater. The contractor shall conduct a pre-construction baseline survey and building protection report, implement building protection measures as specified in the building protection report, and conduct a post-construction survey of the CVS/Golden Gate Theater in relation to Guideway Alignment construction adjacent to the historical resource. Building protection measures shall be implemented in conjunction with MM NOI-1 through MM NOI-15.

- The contractor shall conduct a pre-construction survey to establish baseline, preconstruction conditions and to assess the building category and the potential for ground borne vibration to cause damage. Geotechnical investigations shall be undertaken to evaluate soil, groundwater, seismic, and environmental conditions along the alignment. This analysis shall inform the development of appropriate support mechanisms for cut and fill construction areas or areas that could experience differential settlement as a result of using a tunnel boring machine (TBM) in close proximity to the historical resource. An architectural historian or historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) shall review final design documents prior to implementation of measures.

- The contractor shall implement building protection measures as identified in the building protection report to protect the structure from vibration damage. This may include methods such as underpinning, soil grouting, or other forms of ground improvement, as well as lower vibration equipment and/or construction techniques. If the building protection report determines the historical resource has the potential to be impacted by differential settlement caused by TBM construction, appropriate building protection measures shall be identified and implemented such as the use of an earth pressure balance or slurry shield TBM. The implementation of the required measures and their effectiveness shall be documented in a post-construction survey.

- A post-construction survey shall also be undertaken to ensure that no significant impacts had occurred to historical resources. An architectural historian or historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) shall prepare an assessment of the implementation of the mitigation measures.

Finding

Significant impacts associated with vibrations and ground settlement during construction would be mitigated by building protection measures to be put in place, such as ground improvements and/or use of lower vibration-generating construction equipment, as identified in a pre-construction survey and building protection report. For the reasons stated above, Metro finds that, through implementation of MM CUL-1, the Project's impacts related to a substantial adverse change in the significance of a historical resource pursuant to 15064.5, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on cultural resources with respect to Impact CUL-1.

2.2.2.2 Archaeological Resources

The Project would have less than significant impacts with mitigation measures related to cultural resources with respect to the following significance threshold:

- Impact CUL-2: Would the Project cause a substantial adverse change in the significance of a unique archaeological resource pursuant to 15064.5?

Impact

The California Historical Resources Information System (CHRIS) records search, additional archival research, outreach, and field survey failed to identify any archaeological sites within the Area if Direct Impact (ADI) for archaeological resources. However, it is possible that unknown archaeological resources lay buried within the ADI. The project DSA has been used by Native American peoples for thousands of years and was used with increasing intensity throughout the historic period. Significant buried archaeological resources may exist within the ADI, and it is possible these archaeological materials could be unearthed during project excavation activities. The alignment is largely within the public ROW that has been disturbed with utility and street construction, but these disturbances are relatively shallow. Shallow construction work, such as for the at-grade portions of the alignment, has limited potential to encounter intact archaeological resources due to prior disturbance, but other proposed construction activities have the potential to encounter intact archaeological resources. Tunnel boring would occur through areas that may have unknown archaeological resources. The TBM does not allow for discovery of intact archaeological resources because the method of construction limits observation of impacted soils. However, the TBM would only be used at depths containing soils deposited prior to human occupation, and thus archaeological resources are not anticipated to be present where the TBM would be operated. However, other proposed construction activities have the potential to encounter intact archaeological resources. Deeper impacts within Holocene soils, such as the installation of piles for aerial structures and the excavation required for the TBM launch pit and extraction pit, have the potential to encounter deeply buried resources. Therefore, construction of the Project has the potential to disturb and destroy a significant archaeological resource, which, without mitigation, would result in a significant impact.

Reference

Section 3.4.6.2, Impact CUL-2: Archaeological Resources, of the Recirculated Draft EIR, pages 3.4-43 through 3.4-44; Section 2.4.4.2 and Section 3.2.6 of the Final EIR.

Mitigation Measures

The following mitigation measure reduce impacts on unknown archaeological resources to less than significant.

MM CUL-8: Unknown Archaeological Resources. Prior to any ground-disturbing activities, all construction personnel involved in ground-disturbing activities shall be provided with appropriate cultural resources training. The training shall instruct the personnel regarding the legal framework protecting cultural resources, typical kinds of cultural resources that may be found within the project area, and proper procedures and notifications for if cultural resources are inadvertently discovered.

In addition, the contractor shall retain a qualified archaeologist to prepare a project-wide Cultural Resources Monitoring and Mitigation Plan (CRMMP) that shall be implemented during construction. This document shall address areas where potentially significant prehistoric and historic archaeological deposits are likely to be located within the Area of Direct Impact (ADI) based on background research and a geoarchaeological analysis. Preparation of the CRMMP shall necessitate the completion of pedestrian survey of the private property parcels in the ADI that were not accessible during the preparation of the Eastside Transit Corridor Phase 2 Cultural Resources Impacts Report.

The CRMMP shall include a detailed prehistoric and historic context that clearly demonstrates the themes under which any identified subsurface deposits would be determined significant. Should significant deposits be identified during earth-moving activities, the CRMMP shall address methods for data recovery, anticipated artifact types, artifact analysis, report writing, repatriation of human remains and associated grave goods, and curation.

The CRMMP shall also require that a qualified Archaeologist in prehistoric and historical archaeology (36 CFR Part 61) be retained prior to ground-disturbing activities. The CRMMP will be a guide for monitoring activities. If buried cultural resources, such as flaked or ground stone, historic debris, building foundations, or non-human bone, are discovered during ground-disturbing activities, halt work in that area and within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation. As detailed in MM TCR-1, a Native American monitor shall be retained if treatment involves work at a prehistoric site, or to monitor ground disturbing activities at other locations determined appropriate during tribal consultation. An archaeological monitor will be retained for work at locations identified as sensitive during tribal consultation that require a tribal monitor or other locations identified as likely to contain archaeological resources. Identified areas shall be monitored by, or under the supervision of, the qualified Archaeologist, in accordance with the Project CRMMP. If during cultural resources monitoring the qualified archaeologist determines that the sediments being excavated are previously disturbed or unlikely to contain significant cultural materials, the qualified archaeologist can specify that monitoring be reduced or eliminated.

Finding

Significant impacts associated with the potential for Project construction to disturb and destroy a significant unknown archaeological resource would be mitigated by requiring that construction workers receive training on how to proceed if cultural resources are inadvertently discovered and that a Cultural Resources Monitoring and Mitigation Plan (CRMMP) be prepared, which would establish protections for unanticipated discoveries of archaeological resources. For the reasons stated above, Metro finds that, through implementation of MM CUL-8, the Project's impacts related to a substantial adverse change in the significance of a unique archaeological resource pursuant to 15064.5, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect on cultural resources with respect to Impact CUL-2.

2.2.2.3 Disturbance of Human Remains

The Project would have less than significant impacts with mitigation measures related to cultural resources with respect to the following significance threshold:

- Impact CUL-3: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Impact

There are no known cemeteries or archaeological sites including human remains within the ADI. However, unknown human burials may exist within the ADI, and it is possible these burials could be unearthed during project excavation activities. Therefore, construction of the Project has the potential to disturb and destroy an unknown burial which, without mitigation, could result in a significant impact.

Reference

Section 3.4.6.3, Impact CUL-3: Disturbance of Human Remains, of the Recirculated Draft EIR, pages 3.4-46 through 3.4-47; Section 2.4.4.3 and Section 3.2.6 of the Final EIR.

Mitigation Measures

The following mitigation measure reduce impacts related to the disturbance of human remains to less than significant.

MM CUL-9: Unanticipated Discovery of Human Remains. If human remains are discovered, work in the immediate vicinity of the discovery shall be suspended and the Los Angeles County Coroner contacted. If the remains are deemed Native American in origin, the Coroner shall contact the Native American Heritage Commission (NAHC) and identify a Most Likely Descendant (MLD) pursuant to PRC Section 5097.98 and CEQA Guidelines Section 15064.5. The MLD may inspect the site within 48 hours of being notified and issue recommendations for scientific removal and nondestructive analysis. If the MLD fails to make recommendations, then Metro and/or the landowner may rebury the remains in a location not subject to further disturbance at their discretion. Work may be resumed at the discretion of Metro but will only commence after consultation and treatment have been concluded. Work may continue on other parts of the project while consultation and treatment are conducted.

Finding

Significant impacts associated with the potential for Project construction to disturb and destroy an unknown burial would be mitigated by requiring the establishment of procedures for consultation and proper treatment if human remains are discovered. For the reasons stated above, Metro finds that, through implementation of MM CUL-9, the Project's impacts related to the disturbance of any human remains, including those interred outside of formal cemeteries, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on cultural resources with respect to Impact CUL-3.

2.2.3 Hazards and Hazardous Materials

2.2.3.1 Release of Hazardous Materials

The Project would have less than significant impacts with mitigation measures related to hazards and hazardous materials with respect to the following significance threshold:

- Impact HAZ-2: 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 into the environment?

Impact

During ground preparation and construction activities, construction workers and the public could come in contact with and be exposed to the hazardous materials. Effects could include the potential exposure of construction workers and/or the public to chemical compounds in soils, soil gases, and groundwater; potential localized spread of contamination; potential exposure of workers, the public, and the environment to airborne chemical compounds migrating from the construction or demolition areas; and potential accidents during transportation of contaminated slurry or soils or groundwater.

Parcels within one-quarter mile of the Project's alignment have confirmed releases of hazardous materials, including petroleum hydrocarbons, volatile organic compounds (VOCs), and metals. In addition, other potentially affected parcels within one-quarter mile of the Project's alignment may have subsurface contamination from undocumented releases associated with current and/or historical use of the property(ies) (e.g., railroad corridors, gas stations, dry cleaners, or industrial properties). Elevated concentrations of lead and chromium may be present in the striping paint used on the existing roadways. There is the potential during construction to encounter, dewater, and dispose of contaminated groundwater during ground disturbing activities, shallow excavation, tunnel boring or excavation for the underground guideway, and relocation of utilities. In addition, utility relocation could result in treated wood waste (TWW) that requires disposal. Exposure to documented or undocumented hazardous materials conditions could expose construction workers and the public to hazardous conditions, which, without mitigation, would be a significant impact.

Construction of the MSF would require demolition of existing structures. Demolition of structures could potentially expose construction workers and the public to hazardous conditions through the disturbance or improper handling and/or disposal of hazardous building materials such as asbestos-containing materials, lead-based paints, or polychlorinated biphenyls (PCBs).Thus, construction of the MSF 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, which, without mitigation would be a significant impact.

Reference

Section 3.8.6.2, Impact HAZ-2: Release of Hazardous Materials, of the Recirculated Draft EIR, pages 3.8-39 through 3.8-43; Section 2.4.8.2 and Section 3.2.9 of the Final EIR.

Mitigation Measures

The following mitigation measures reduce impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials to less than significant.

MM HAZ-1: Phase II Environmental Site Assessment (ESA). Before any substantial ground disturbance occurs on or near the properties with documented releases, Metro shall hire a qualified environmental professional to conduct a Phase II Environmental Site Assessment to determine the potential presence of petroleum hydrocarbons, metals (i.e., lead that was aerially deposited and lead chromate) that exceed thresholds established by the California Health and Safety Code and Title 22, and VOCs in soil and/or groundwater in accordance with the findings and recommendations of the Draft Final Initial Site Assessment Report prepared for Alternative 1 (Washington Alternative) (Kleinfelder 2021).

The Phase II ESA shall include sufficient soil and groundwater sampling and laboratory analysis to identify the types of chemicals and their respective concentrations. The Phase II ESA shall compare soil and groundwater sampling results against applicable environmental screening levels developed by the Los Angeles Regional Water Quality Control Board (RWQCB) and/or the Department of Toxic Substances Control (DTSC). If the Phase II ESA identifies contaminant concentrations above the screening levels, a site-specific soil and groundwater management plan shall be prepared and implemented as described in Mitigation Measure HAZ-2. Metro shall consult with the Los Angeles RWQCB, DTSC, and/or other appropriate regulatory agencies to ensure sufficient minimization of risk to human health and the environment is completed.

MM HAZ-2: Soil and Groundwater Management Plan. Prior to excavation, a site-specific soil and groundwater management plan shall be prepared by Metro's contractor to address handling and disposal of contaminated soil and groundwater prior to demolition, excavation and construction activities. Metro shall consult with the Los Angeles Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), and/or other appropriate regulatory agencies to ensure sufficient minimization of risk to human health and the environment is completed. The soil and groundwater management plan shall specify all necessary procedures to ensure the safe handling and disposing of excavated soil, groundwater, and/or dewatering effluent in a manner that is protective of human health and in accordance with federal and state hazardous waste disposal laws, and with state and local stormwater and sanitary sewer requirements. At a minimum, this shall include the following:

- Identification and delineation of contaminated areas and procedures for limiting access to such areas to properly trained personnel;
- Step-by-step procedures for handling, excavating, characterizing, and managing excavated soils and dewatering effluent, including procedures for containing, handling, and disposing of hazardous waste, procedures for containing, handling, and disposing of groundwater generated from construction dewatering, the method used to analyze excavated materials and groundwater for hazardous materials likely to be encountered at specific locations, appropriate treatment and/or disposal methods;

- Procedures for notification and reporting, including notifying and reporting to internal management and to local agencies;
- Minimum requirements for site-specific health and safety plans, to protect the general public and workers in the construction area.
- Prior to excavation, the Contractor shall prepare the Soil and Groundwater Management Plan and the results of environmental sampling shall be provided to contractors who shall be responsible for developing their own construction worker safety manuals and construction work plans and training requirements, per MM HAZ-4.
- Metro's contractor shall sample groundwater suspected of contamination. If any contaminated groundwater is encountered during construction, the contractor will stop work in the vicinity, cordon off the area, and contact Metro and will immediately notify RWQCB. In coordination with the RWQCB, an investigation and remediation plan will be developed in order to protect public health and the environment. Any hazardous or toxic materials will be disposed according to local, state, and federal regulations.

MM HAZ-3 : Contractor Specifications. Metro shall include in its contractor specifications the following requirement relating to hazardous materials:

- During all ground-disturbing activities, the contractor(s) shall inspect the exposed soil and groundwater for obvious signs of contamination, such as odors, stains, or other suspect materials. Qualified personnel shall monitor for volatile organic compounds and other subsurface gases for concentrations exceeding U.S. Environmental Protection Agency (USEPA) Regional Screening Levels and/or Department of Toxic Substances Control (DTSC) Screening Levels with a Photoionization Detector. Should signs of unanticipated contamination be encountered, work shall be halted and materials tested. An investigation shall be designed and performed to verify the presence and extent of contamination at the site, and a site-specific soil and groundwater management plan, as described under Mitigation Measure HAZ-2 above, shall be prepared and implemented.

MM HAZ-4: Safety Manuals and Construction Work Plans. The contractor shall prepare site-specific Safety Manuals and Construction Work Plans that address worker health and safety to protect the general public and workers in the construction area for Metro's review and approval. The Safety Manuals and Construction Work Plans shall be prepared in accordance with State and California Division of Occupational Safety and Health (Cal/OSHA) regulations. Copies of the plans shall be made available to construction workers for review during their orientation and/or regular health and safety meetings. The plans shall identify chemicals of concern, potential hazards, worker training requirements, personal protective equipment and devices, decontamination procedures, the need for personal or area monitoring, and emergency response procedures. The plans shall be amended, as necessary, if new information becomes available that could affect implementation of the plan.

MM HAZ-5: Hazardous Building Survey and Abatement. Prior to demolition activities of any structures, Metro shall retain a California Division of Occupational Safety and Health (Cal/OSHA) certified contractor to determine the presence or absence of building materials or equipment that contains hazardous materials, including asbestos, lead-based paint, and PCB-containing equipment. If such substances are found to be present, the contractor shall prepare and submit a workplan to the relevant oversight agency to demonstrate how these hazardous materials would be properly removed and disposed of in accordance with federal and state law, including South Coast Air Quality Management District (SCAQMD) Rule 1403 (Asbestos Emissions from Renovation/Demolition Activities). Following completion of removal activities, Metro shall submit documentation to the relevant oversight agency verifying that all hazardous materials were properly removed and disposed.

Finding

Significant impacts associated with the potential for Project construction to expose the public or environment to a hazard involving the release of hazardous materials would be mitigated by requiring a Phase II ESA prior to ground disturbing activities, preparation of a Soil and Groundwater Management Plan to identify and delineate contaminated areas, requiring contractors to inspect soil and groundwater for signs of contamination and to take appropriate site-management measures when warranted, requiring preparation and implementation of site-specific worker health and safety plans, and requiring testing for and abatement of hazardous building materials. For the reasons stated above, Metro finds that, through implementation of MM HAZ-1 through MM HAZ-5, the Project's 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 reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect related to hazards and hazardous materials with respect to Impact HAZ-2.

2.2.3.2 Hazardous Materials Sites (Government Code Section 65962.5)

The Project would have less than significant impacts with mitigation measures related to hazards and hazardous materials with respect to the following significance threshold:

- Impact HAZ-4: 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, create a significant hazard to the public or the environment?

Impact

Two parcels on the proposed MSF site identified as Site 17 (APNs 6336-003-071 and 6336-003-050), would be located on hazardous materials sites included on the Cortese list. The parcels are on the Cortese List as a Closed LUST Cleanup site. Additionally, three parcels listed as Site 15 (APNs 6336-002-018, 6336-002-019) and Site 16 (APN 6336-002-020) are identified on the Cortese list as a closed Land Disposal site and listed as the Vail Avenue Land Reclamation Project for a non-municipal landfill. Construction activities that disturb existing soil contamination from hazardous materials release sites

or other sources, could pose a health risk to construction workers, the public, and/or the environment if not characterized, handled, and disposed of properly. Ground-disturbing activities occurring on sites included on a list of hazardous materials sites could potentially encounter soil or groundwater contamination during construction of the Project, which, without mitigation, could result a significant impact.

The analysis found that the Project would have less than significant impact at the Commerce/Citadel station site. This site (APN 6336-019-031), identified as Site 10, would be located on hazardous materials site included on the Cortese list. The parcel is listed as a Closed Leaking Underground Storage Tank (LUST) Cleanup site. Soil cleanup was overseen and deemed completed by the Regional Water Quality Control Board (RWQCB) as of December 18, 1996. The RWQCB indicated that no further action/remediation was required at the Citadel property. However, the RWQCB shall be notified if additional soil/groundwater contamination is encountered during future activities on the property, and existing groundwater monitoring wells should remain to cooperate in ongoing groundwater investigations associated with off-site sources. Thus, the impact would be less than significant without mitigation.

Reference

Section 3.8.6.4, Impact HAZ-4: Hazardous Materials Sites (Government Code Section 65962.5), of the Recirculated Draft EIR, pages 3.8-54 through 3.8-57; Section 2.4.8.4 and Section 3.2.9 of the Final EIR.

Mitigation Measures

Implementation of MM HAZ-1 through MM HAZ-5, as presented in **Section 2.2.3.1** above, would reduce impacts related to Hazardous Material Sites (Government Code Section 65962.5) to less than significant.

Finding

Significant impacts associated with the potential for Project construction to expose the public or environment to a hazard involving the release of hazardous materials would be mitigated by requiring a Phase II ESA prior to ground disturbing activities, preparation of a Soil and Groundwater Management Plan to identify and delineate contaminated areas, requiring contractors to inspect soil and groundwater for signs of contamination and to take appropriate site-management measures when warranted, requiring preparation and implementation of site-specific worker health and safety plans, and requiring testing for and abatement of hazardous building materials. For the reasons stated above, Metro finds that, with implementation of MM HAZ-1 through MM HAZ-5, the Project's impacts related to sites which are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect related to hazards and hazardous materials with respect to Impact HAZ-4.

2.2.4 Hydrology and Water Quality

2.2.4.1 Water Quality

The Project would have less than significant impacts with mitigation measures related to hydrology and water quality with respect to the following significance threshold:

- Impact HWQ-1: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Impact

The Project has the potential to encounter, dewater, and dispose of groundwater during ground disturbing construction activities, tunnel boring or excavation for the underground guideway, and relocation of utilities. If groundwater needs to be dewatered, a significant impact would occur if the groundwater is contaminated. While construction of the Project would not occur directly within any of the known contaminated sites identified in the area, construction could encounter groundwater contaminated with hazardous materials from sources such as underground storage tanks. Thus, construction of the Project may release contaminated groundwater into nearby surface water and groundwater, which, without mitigation, would be a significant impact.

The analysis found that the Project would have less than significant impact related to erosion, sedimentation and pollutants from construction sites. Construction activities that disturb the ground, such as excavation and grading, have the potential to increase erosion and sedimentation around proposed construction and staging areas, and could potentially result in a temporary increase in suspended solids running off construction sites. In a storm event, construction site runoff could result in sheet erosion of exposed soil. If not adequately controlled, contaminated water runoff from these areas would have the potential to degrade surface water quality in surface water bodies near the alignment. To reduce any potential impacts related to stormwater runoff, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared to comply with the Construction General Permit. Implementation of the SWPPP would ensure that the applicable provisions of the Clean Water Act (CWA) and Urban Runoff Pollution Control from the Los Angeles County Municipal Code would be met, and pollutant discharges would be properly controlled. Los Angeles Regional Water Quality Control Board (LARWQCB) MS4 permit also specifies that permittees must implement a program to control runoff from construction activities. As part of this, an erosion and sediment control plan would be established prior to the initiation of construction activities. Thus, impacts would be less than significant.

Reference

Section 3.9.6.1, Impact HWQ-1: Water Quality, of the Recirculated Draft EIR, pages 3.9-26 through 3.9-29; Section 2.4.9.1 and Section 3.2.10 of the Final EIR.

Mitigation Measures

Implementation of MM HAZ-2 and MM HAZ-3, identified in **Section 2.2.3.1** above, would reduce impacts on water quality to less than significant.

Finding

Significant impacts associated with the potential for Project construction to result in dewatering of contaminated groundwater would be mitigated by requiring preparation of a Soil and Groundwater Management Plan to identify and delineate contaminated areas and requiring contractors to inspect soil and groundwater for signs of contamination and to take appropriate site-management measures when warranted. For the reasons stated above, Metro finds that, with implementation of MM HAZ-2 and MM HAZ-3, the Project's impacts related to violating any water quality standards or waste discharge requirements or otherwise substantially degrading surface or groundwater quality, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on hydrology and water quality with respect to Impact HWQ-1.

2.2.4.2 Water Management

The Project would have less than significant impacts with mitigation measures related to hydrology and water quality with respect to the following significance threshold:

- Impact HWQ-5: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact

The groundwater basin underlying the Project is not subject to a sustainable groundwater management plan and, thus, no conflict with a sustainable groundwater management plan would occur.

However, construction of the Project would conflict with the LA Basin Plan if it were to degrade beneficial uses of the Rio Hondo or San Gabriel River or result in an exceedance of a Total Maximum Daily Load (TMDL) established for those rivers. Construction of the Project has the potential to encounter, dewater, and dispose of groundwater during ground disturbing activities, tunnel boring or excavation for the underground guideway, or relocation of utilities. If groundwater needs to be dewatered, a significant impact would occur if the groundwater is contaminated. While construction of the Project would not occur directly within any of the known contaminated sites identified in the area, construction could encounter groundwater contaminated with hazardous materials from sources such as underground storage tanks. Thus, construction of the Project may release contaminated groundwater into nearby surface water and groundwater, which could conflict with the LA Basin Plan and, without mitigation, result in a significant impact.

Reference

Section 3.9.6.5, Impact HWQ-5: Water Management, of the Recirculated Draft EIR, pages 3.9-58 through 3.9-61; Section 2.4.9.5 and Section 3.2.10 of the Final EIR.

Mitigation Measures

Implementation of MM HAZ-2 and MM HAZ-3, identified in **Section 2.2.3.1** above, would reduce impacts related to conflicts with water quality and management plans to less than significant.

Finding

Significant impacts associated with the potential for Project construction to result in dewatering of contaminated groundwater would be mitigated by requiring preparation of a Soil and Groundwater Management Plan to identify and delineate contaminated areas and requiring contractors to inspect soil and groundwater for signs of contamination and to take appropriate site-management measures when warranted. For the reasons stated above, Metro finds that, with implementation of MM HAZ-2 and MM HAZ-3, the Project's impacts related to conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on hydrology and water quality with respect to Impact HWQ–5.

2.2.5 Noise and Vibration

2.2.5.1 Ambient Noise

The Project would have less than significant impacts with mitigation measures related to noise with respect to the following significance threshold:

- Impact NOI-1: 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?

Impact

Construction of the Project would result in a significant noise impact from general construction activities, the use of pile drivers, nighttime noise, tunnel ventilation, tunneling activities, and on-road truck traffic. Construction noise estimates for construction activities are predicted to exceed the FTA daytime noise limits at 29 noise sensitive receptors. Construction at night is not expected to occur under typical conditions; however, unforeseen schedule or operational limitations may require certain construction activities to occur at night at points along the alignment. If construction at night must occur, construction noise activities would be predicted to exceed the FTA nighttime noise limits of 80 dBA at nearby residential receptors. Therefore, without mitigation, a significant impact would occur.

Without mitigation, construction staging areas for the Atlantic/Pomona Open-Air Station, connection to the existing Metro system, and the TBM receiving pit would have a significant construction noise impact on 10 residential properties if the staging area is located to the west of the alignment and a significant construction noise impact on nine residential properties if the staging area is located to the east of the alignment. Construction staging areas for Greenwood station would be located to the south of Washington Boulevard would, without mitigation, have a significant construction noise impact on two adjacent properties if the staging area is located to the west of the alignment and construction noise impacts on three residential properties if the staging area is located to the east of the alignment.

The MSF is located in an industrial area with the nearest sensitive receptors (such as residences, schools, churches, or parks) being more than 1,000 feet away with intervening buildings. Noise levels

from construction would not exceed the FTA criteria for residential receivers of 90 dBA through the day or 80 dBA at night. However, noise levels would exceed the FTA criteria for commercial or industrial receivers of 100 dBA through the day or 100 dBA at night at one industrial building immediately adjacent to the site. Therefore, without mitigation, a significant impact would occur.

Reference

Section 3.11.6.1, Impact NOI-1: Ambient Noise, of the Recirculated Draft EIR, pages 3.11-28 through 3.11-32; Section 2.4.11.1 and Section 3.2.12 of the Final EIR.

Mitigation Measures

The following mitigation measures reduce impacts on ambient noise to less than significant.

MM NOI-1: Metro shall require the Contractor to develop a construction noise control plan and a construction noise monitoring plan to minimize noise impacts. The construction noise plan shall include construction noise performance criteria. At a minimum, the performance criteria shall prohibit construction noise from exceeding the FTA general assessment construction noise criteria of 80 dBA for nighttime work and 90 dBA for daytime work at residential properties, or 100 dBA at commercial or industrial properties for daytime or nighttime work. These criteria shall be measured at the boundary of any occupied property where the noise is being received.

MM NOI-2: Metro shall require the Contractor to use construction methods that avoid pile-driving at locations containing noise- and vibration-sensitive receptors, such as residences, schools, and hospitals where practicable. Metro's Contractor shall use cast-in-drilled hole (CIDH) or drilled piles rather than impact pile drivers if necessary to meet construction noise performance criteria established in the construction noise control plan and construction noise monitoring plan.

MM NOI-3: Metro shall require the Contractor to erect temporary noise barriers between noisy activities and noise sensitive receptors as necessary to ensure compliance with applicable construction noise performance criteria as specified in the construction noise monitoring plan developed under MM NOI-1. During construction, Metro shall perform audits to monitor the effectiveness of the noise barriers.

MM NOI-4: Metro shall require the Contractor to locate construction equipment and material staging areas away from sensitive receptors where practicable.

MM NOI-5: Metro shall require the Contractor to route construction traffic and haul routes along roads in areas without receptors sensitive to noise and vibration, where practicable.

MM NOI-6: Metro shall require contractors to use best available control technologies to limit excessive noise when working near residences (e.g., piling noise shrouds) where practicable.

MM NOI-7: (MM NOI-1 has been revised to clarify that FTA general noise criteria for nighttime construction work shall not be exceeded)

MM NOI-8: Metro shall notify the public, including schools, of construction operations and schedules. Metro shall provide a construction-alert publication and set up a Construction Hotline that shall reply to complaints within 2 working days.

MM NOI-9: Metro shall require the Contractor to comply with FTA goundborne noise and vibration criteria confirmed in the construction noise monitoring plan for tunnel construction, including spoil removal and transport of segmental tunnel lining. This shall include, where necessary, methods such as installation of temporary tunnel track with smooth rail and wheels, and/or car speeds that limit structure-borne noise and vibration, or use of spoil removal conveyor.

MM NOI-10: Metro shall require the Contractor to not stage trucks in residential areas.

MM NOI-11: Metro shall require temporary and permanent tunnel vent fans to be located away from residences. Metro shall require that noise from these shall be attenuated to comply with the noise control plan and local code requirements for fixed stationary heating, ventilation, and air conditioning (HVAC) or other machinery noise.

Finding

Significant noise impacts associated with Project construction would be mitigated by reducing construction noise levels experienced by sensitive receptors through means such as the use of noise buffers, maximizing the distance between noise generating activities and sensitive receptors to the degree feasible, minimizing noise generation such as through the use of equipment mufflers to the degree feasible, and establishing a Construction Hotline to resolve noise issues. For the reasons stated above, Metro finds that, with implementation of MM NOI-1 through MM NOI-11, the Project's impacts related to increases 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 be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on noise with respect to Impact NOI-1.

2.2.5.2 Ground-Borne Vibration or Ground-Borne Noise

The Project would have less than significant impacts with mitigation measures related to noise with respect to the following significance threshold:

- Impact NOI-2: Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Impact

Corridor-wide vibration levels are predicted to exceed the FTA frequent criterion of 72 vibration decibels (VdB) at 54 residences during operations. These impacts are due to the proximity of residences to proposed switches, and proximity to the tunnel section of the alignment. One vibration impact is predicted to reach 80 VdB at Kipp Raices Academy, 668 Atlantic Boulevard close to the alignment, exceeding an FTA Category 3 receptor (institutional land uses such as schools, libraries, and museums), which, without mitigation, would result in a significant impact.

Use of construction related equipment and heavy-machinery such as TBMs, bulldozers, dump trucks, vibratory rollers, pile drivers, and machinery to remove excavation spoils from the TBM could result in vibration damage to structures and annoyance to residences and other FTA Category 2 land uses (buildings used for sleeping such as residences, hotels, and hospitals). As a result of the preliminary construction vibration estimates, construction activities are predicted to exceed the FTA impact criteria at the closest residences and commercial properties. Construction activities would be carried out in compliance with Metro's baseline specifications Section 015619, Construction Noise and Vibration Control would reduce impacts, however additional measures would be required to reduce impacts to less than significant.

Reference

Section 3.11.6.2, Impact NOI-2: Ground-Borne Vibration or Ground-Borne Noise, of the Recirculated Draft EIR, pages 3.11-43 through 3.11-47; Section 2.4.11.2 and Section 3.2.12 of the Final EIR.

Mitigation Measures

The following mitigation measures, discussed in Section 1.8.5.1, would be implemented: MM NOI-2, MM NOI-4, MM NOI-5, MM NOI-7, MM NOI-8, and MM NOI-9. Additionally, the following mitigation measures would be implemented to reduce impacts related to ground-borne vibration and noise.

MM NOI-12: Within the tunnel, Metro shall reduce operational vibration impacts through use of track support systems which incorporate resilience, such as ballast mats, high resilience track fasteners, resiliently supported ties or floating track slabs as necessary to be below FTA criteria for frequent annoyance from operational vibration. FTA criteria for frequent annoyance is an exceedance of 72 vibration decibels (VdB) at residential uses and 75 VdB at daytime institutional uses, including schools, for more than 70 events per day.

MM NOI-13: Metro shall reduce vibration impacts where necessary to be below FTA criteria for frequent annoyance due to gaps at switches by methods such as installing ballast mats or other resilient fixings under conventional switches to “decouple” the train vibration from the track supporting structure or using a monoblock frog or other low vibration switches. FTA criteria for frequent annoyance from operational vibration is an exceedance of 72 vibration decibels (VdB) at residential uses and 75 VdB at daytime institutional uses including schools for more than 70 events per day.

MM NOI-14: Metro shall identify selected properties that may be susceptible to vibration damage within 100 feet of the alignment to determine the baseline structural integrity and condition of walls and joints using methods such as photographic documentation of the interior walls and/or exterior façade as a basis for comparison after construction is completed.

MM NOI-15: Metro shall require the Contractor to develop a construction vibration control plan and a construction vibration monitoring plan to minimize vibration impact and reduce the risk of damage to susceptible structures. The construction vibration control plan shall specify implementation of vibration control measures to ensure that vibration during construction activities shall not exceed peak particle velocity (ppv) 0.2 inches per section (ips) at any non-engineered timber and masonry building.

Finding

Significant vibration impacts associated with Project operation would be mitigated by reducing vibratory impacts caused by steel wheels rolling over steel rails at rail joints during the passby of LRT vehicles at sensitive receptors and by reducing the width of gaps at joints when steel wheels roll over steel rails at rail joints. Significant vibration impacts associated with Project construction would be mitigated by reducing construction vibration levels experienced by sensitive receptors through means such as limiting the use of impact pile drivers, maximizing the distance between vibration generating activities and equipment from sensitive receptors to the degree feasible, routing haul routes away from sensitive receptors as feasible, collecting baseline data for monitoring vibration impacts and developing a construction vibration control plan to minimize vibration impact and reduce the risk of damage to susceptible structures. For the reasons stated above, Metro finds that, with implementation of MM NOI-2, MM NOI-4, MM NOI-5, MM NOI-7, MM NOI-8, MM NOI-9, and MM NOI-12 through MM NOI-15, the Project's impacts to ground-borne vibration or ground-borne noise related to the generation of excessive ground-borne vibration or ground-borne noise levels, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect of noise and vibration with respect to Impact NOI-2.

2.2.6 Transportation and Traffic

2.2.6.1 Conflict with Programs, Plans, and Policies

The Project would have less than significant impacts with mitigation measures related to transportation and traffic with respect to the following significance threshold:

- Impact TRA-1: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact

The Project would include construction of bored tunnels, cut-and-cover underground segments, transition structures, and aerial and at-grade segments. At locations with cut-and-cover underground segments and aerial segments, temporary closures of some intersections, lanes, or sidewalks may be necessary during construction, which may disrupt bus service. As the Project would be constructed in segments, these temporary lane closures and turn restrictions would not affect all intersections simultaneously. However, due to the temporary roadway closures, lane closures, and sidewalk closures, the Project would result in significant impacts related to transit during construction.

Construction activities would require temporary closures and detours that would cause a reduction in capacity along affected roads, particularly along Washington Boulevard, which is an important truck route. Trucks using Washington Boulevard would be affected due to these closures and associated detours. At the proposed Commerce/Citadel station, industrial properties that rely on Smithway Street as their only access point for trucks would also be affected during project construction if access is unable to be maintained during construction. Prohibiting access to these properties would be considered a significant impact.

Temporary sidewalk closures would be required along construction areas, including during construction of at-grade and aerial segments and along 3rd Street during construction of the transition from the existing at-grade alignment to an underground configuration. For the aerial segment, the erection of falsework (temporary support structures) and the installation of the aerial guideway columns may affect sidewalk access. Temporary sidewalk closures may also occur at other locations along the alignment such as constructing the transition from aerial to at-grade. Although temporary, the potential disruptions to pedestrian circulation would, without mitigation, result in a significant impact to pedestrian conditions during project construction.

Temporary lane closures may affect existing and proposed bike routes along the alignment and proposed station locations. Bicycle traffic movements would be maintained during construction, but lane reductions and street closures would inhibit the flow of bicycle traffic and may require detours. Montebello Bus Line 50, which operates on Washington Boulevard, would require temporary rerouting and relocation of bus stops during construction of the MSF. Construction of the MSF would require the permanent closure of Acco Street to through traffic and cul-de-sacs would be constructed on either side of the lead tracks. Proposed bicycle facilities along Flotilla Street and Vail Avenue could interfere with and could require temporary closures during construction activities of the MSF. Therefore, without mitigation, construction of the Project would result in a significant impact related to bicycle and pedestrian circulation.

Reference

Section 3.14.6.1, Impact TRA-1: Conflict with Programs, Plans, and Policies, of the Recirculated Draft EIR, pages 3.14-22 through 3.14-29; Section 2.4.14.1 and Section 3.2.15 of the Final EIR.

Mitigation Measures

The following mitigation measure reduce impacts on transportation and traffic to less than significant.

MM TRA-1: The contractor shall prepare a Traffic Management Plan as needed to facilitate the flow of traffic in and around construction zones. The Traffic Management Plan shall include, at minimum, the following measures:

- Where feasible, schedule construction-related travel (i.e., deliveries) during off-peak hours and maintain two-way traffic circulation along affected roadways during peak hours.
- Designated routes for project haul trucks shall be located along the Project corridor ROW and/or major streets connecting to construction staging areas and the nearest freeways (e.g., SR-60, I-5, and I-605). Major streets may include Atlantic Boulevard, Saybrook Avenue, Telegraph Road, Washington Boulevard, Paramount Boulevard, Rosemead Boulevard, Slauson Avenue, and Whittier Boulevard. In cooperation with the jurisdictions along the alignment and implemented throughout the construction process, these routes shall be consistent with local land use and mobility plans and situated to minimize noise, vibration, and other possible impacts.
- Contractors shall maintain safe and convenient pedestrian routes to school by ensuring project haul routes and construction traffic, to the greatest extent possible, avoid any published school pedestrian routes.

- Develop detour routes to facilitate traffic movement through construction zones without significantly increasing cut-through-traffic in adjacent residential areas.
- Develop and implement an outreach program and public awareness campaign in coordination with transit agencies to inform the general public about the construction process and planned roadway closures, potential impacts, and mitigation measures, including temporary bus stop relocation.
- Develop and implement a program with business owners to minimize effects to businesses during construction activity, including but not limited to signage programs and identification of detours (particularly for truck access).
- Where feasible, temporarily restripe roadways to maximize the vehicular capacity at locations affected by construction closures.
- Where feasible, temporarily remove on-street parking to maximize the vehicular capacity at locations affected by construction closures.
- Traffic control officers at major intersections during peak hours shall be provided as required by the Traffic Management Plan and Worksite Traffic Control Plans if delays are related to construction activities.
- Provide wayfinding signage, lighting and access to specify pedestrian safety amenities (such as handrails, fences, and alternative walkways) during construction.
- Where construction encroaches on sidewalks, walkways, crosswalks, and multi-use trails, special pedestrian safety measures shall be used, such as detour routes and temporary pedestrian shelters.
- Provide detour routes and signage to address temporary effects to multi-use trails and bicycle circulation, and minimize inconvenience (e.g., lengthy detours) as to minimize users potentially choosing less safe routes if substantially rerouted.
- Regular communication with school administrators shall be maintained to ensure sufficient notice of construction activities and/or detours, that could affect pedestrian routes to schools is provided.
- Construction flaggers shall be implemented any time a construction ingress or egress is located with 200 feet of a schools' student entrance during school hours.
- Metro's construction outreach efforts shall include reaching out to local school district administrators to provide advanced information regarding construction activities and/or detours if construction activities will affect bus routes and stops to schools.
- Access to adjacent businesses and schools (including access to passenger loading areas for student drop-offs at schools) shall be provided via existing or temporary driveways or loading zones during business and school hours throughout the construction period.

Finding

Significant impacts associated with temporary disruptions to transit and traffic, pedestrian, and bicycle circulation during construction would be mitigated by requiring preparation of a Traffic Management Plan that specifies measures to minimize disruption of transit and traffic, pedestrian, and bicycle circulation during construction. For the reasons stated above, Metro finds that, with implementation of MM TRA-1, the Project's impacts related to conflicting with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on transportation and traffic with respect to Impact TRA-1.

2.2.7 Tribal Cultural Resources

2.2.7.1 Historical Tribal Cultural Resources

The Project would have less than significant impacts with mitigation measures related to tribal cultural resources with respect to the following significance threshold:

- Impact TCR-1: Would the Project cause a substantial adverse change in a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)?

Impact

Construction of the Project would require ground-disturbing activities, including grading and excavation of Holocene deposits. These activities would have the potential to disturb and destroy Tribal Cultural Resources (TCRs) that are currently unknown. Although the Area of Direct Impact (ADI) is heavily disturbed and urbanized, some of the construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. However, tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs. If unmitigated, this potential disturbance of TCRs during construction of Project would result in a significant impact.

Reference

Section 3.15.6.1, Impact TCR-1: Historical Resources, of the Recirculated Draft EIR, pages 3.15-9 through 3.15-10; Section 2.4.15.1 and Section 3.2.16 of the Final EIR.

Mitigation Measures

The following mitigation measures reduce impacts on tribal cultural resources with respect to potential disturbances to TCRs to less than significant.

MM TCR-1: Tribal Cultural Resources Training. Prior to any ground-disturbing activities, all construction personnel involved in ground-disturbing activities shall be provided with appropriate Tribal Cultural Resources training. The training shall instruct the personnel regarding the legal framework protecting Tribal Cultural Resources, typical kinds of Tribal Cultural Resources that may be found within the project area, and proper procedures and notifications if Tribal Cultural Resources are inadvertently discovered.

MM TCR-2 Retain a Native American Monitor. A Native American monitor shall be retained for work at locations identified as sensitive during tribal consultation and agreed upon between the lead agency and the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government. The monitor shall only be present on-site during the construction phases that involve ground disturbing activities where areas of ground disturbance and/or removed spoils are visible for inspection. If during cultural resources monitoring the qualified archaeologist or Native American Monitor determines that the sediments being excavated are previously disturbed or unlikely to contain significant cultural materials, the qualified archaeologist or Native American Monitor can recommend that monitoring be reduced or eliminated.

MM TCR-3 Unknown Tribal Cultural Resources. The contractor shall retain a qualified archaeologist to prepare a project-wide Cultural Resources Monitoring and Mitigation Plan (CRMMP) that shall be implemented during construction. This document shall address areas where potentially significant prehistoric and historic archaeological deposits, and Tribal Cultural Resources are likely to be located within the Area of Direct Impact (ADI) based on background research, a geoarchaeological analysis, and Tribal consultation. The CRMMP shall encompass both archaeological and Tribal Cultural Resources and shall be kept confidential. Preparation of the CRMMP shall necessitate the completion of pedestrian survey of the private property parcels in the ADI that were not accessible during the preparation of this Eastside Transit Corridor Phase 2 EIR.

The CRMMP shall include a detailed prehistoric and historic context that clearly demonstrates the themes under which any identified resources would be determined significant. Should significant deposits be identified during earth-moving activities, where feasible, the CRMMP shall address methods for data recovery, anticipated artifact types, artifact analysis, report writing, repatriation of human remains and associated grave goods, and curation or other methods of disposition in consultation with the Tribe.

The CRMMP shall also require that an archaeologist qualified in prehistoric and historical archaeology and a Native American monitor who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the Native American Heritage Commission (NAHC)'s Tribal Contact list for the area of the project location be retained prior to ground-disturbing activities. The CRMMP shall be a guide for monitoring activities. If buried Tribal Cultural Resources

or cultural resources, such as flaked or ground stone, historic debris, building foundations, or non-human bone, are discovered during ground-disturbing activities, work shall stop in that area and within 50 feet of the find until a qualified archaeologist and Native American Monitor can assess the significance of the find and, if necessary, develop appropriate treatment measures. If resources are Native American in origin and may also be Tribal Cultural Resources, treatment and curation of these resources shall be determined in consultation with the Tribe. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation.

Finding

Significant impacts associated with the potential for Project construction to disturb TCRs would be mitigated by ensuring that construction workers have a clear understanding of TCRs that may be present in the construction area, retaining a Native American monitor for work locations identified as sensitive through consultation and establishment of a project-wide Cultural Resources Monitoring and Mitigation Plan (CRMMP), and by identifying procedures and plans for safely handling TCRs. For the reasons stated above, Metro finds that, with implementation of MM TCR-1 through MM TCR-3, the Project's impacts related to causing a substantial adverse change in a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on tribal cultural resources with respect to Impact TCR-1.

2.2.7.2 Native Tribal Significance

The Project would have less than significant impacts with mitigation measures related to tribal cultural resources with respect to the following significance threshold:

- Impact TCR-2: Would the Project cause a substantial adverse change in a TCR that is 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Impact

Construction activities that cause ground disturbance, including grading and excavation in Holocene deposits, would have the potential to disturb and destroy TCRs that are currently unknown. Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. Tribal consultation findings indicate that the entire

alignment is sensitive for potential buried, unidentified TCRs. If unmitigated, this potential disturbance of TCRs during construction of the Project would result in a significant impact.

Reference

Section 3.15.6.2, Impact TCR-2: Native Tribal Significance, of the Recirculated Draft EIR, pages 3.15-14 through 3.15-15. Section 2.4.15.2 and Section 3.2.16 of the Final EIR.

Mitigation Measures

Implementation of MM TCR-1 through MM TCR-3, as identified in **Section 2.2.7.1** above, would reduce impacts related to disturbance of tribal cultural resources to less than significant.

Finding

Significant impacts associated with the potential for Project construction to disturb TCRs would be mitigated by ensuring that construction workers have a clear understanding of TCRs that may be present in the construction area, retaining a Native American monitor for work locations identified as sensitive through consultation and establishment of a project–wide Cultural Resources Monitoring and Mitigation Plan (CRMMP), and by identifying procedures and plans for safely handling TCRs. For the reasons stated above, Metro finds that, with implementation of MM TCR-1 through MM TCR-3, the Project's impacts related to causing a substantial adverse change in a TCR that is 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 PRC Section 5024.1, would be reduced to less than significant levels. Thus, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1, that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on tribal cultural resources with respect to Impact TCR-2.

2.3 Environmental Impacts Found to be Less Than Significant

2.3.1 Aesthetics

2.3.1.1 Vistas

The Project would have less than significant impacts related to aesthetics with respect to the following significance threshold:

- Impact AES-1: Would the Project have a substantial adverse effect on a scenic vista?

Impact

Operation of the Project would not substantially obstruct views of the surrounding landscapes and topography, including the San Gabriel Mountains, former Operating Industries, Inc. (OII) landfill, and downtown Los Angeles skyline because the surrounding industrial and commercial development

already prevents clear views of the mountains and skyline. The aerial alignment would not substantially obstruct views of the San Gabriel Mountains or the Los Angeles skyline because existing views are currently limited by flat topography and existing development. The addition of LRT vehicles would be comparable to the roadway traffic along Washington Boulevard and the overhead wires and catenary poles would not diminish long-range views of these natural landscapes, which are readily visible from many points along Washington Boulevard. Construction of the Project would introduce visually disruptive elements but would not substantially obstruct views of the San Gabriel Mountains or downtown Los Angeles skyline, because activities would be temporary and intermittent and limited to the immediate area.

Reference

Section 3.1.6.1, Impact AES-1: Vistas, of the Recirculated Draft EIR, pages 3.1-29 through 3.1-31; Section 2.4.1.1 and Section 3.2.4 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to having a substantial adverse effect on a scenic vista would be less than significant.

2.3.1.2 Visual Character

The Project would have less than significant impacts related to aesthetics with respect to the following significance threshold:

- Impact AES-3: Would the Project in non-urbanized areas, 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?

Impact

Certain elements that would be located on properties outside of the public ROW (e.g., station plazas and TPSS) would comply with applicable zoning and design requirements, including the MRDC (2018), Metro's Transit Service Policies and Standards, Metro Art Program Policy, Systemwide Station Design Standards Policy, and Architectural Standard/Directive Drawings (2018). These Metro standards, design criteria, policies, and directives include design elements for LRT infrastructure. Construction of the Project would comply with applicable regulations governing scenic quality, including SCAQMD Rule 403, and would occur mostly underground with a short at-grade segment and short aerial segment. Construction activities would be a visual nuisance, however, they would be temporary and intermittent and limited to the immediate area. In addition, the perimeter of construction staging associated with station and station plaza construction would be fenced for a variety of purposes, including screening views, security, and noise control, and could incorporate artwork, Metro-branded designs, and/or community relevant messaging.

Reference

Section 3.1.6.3, Impact AES-3: Visual Character, of the Recirculated Draft EIR, pages 3.1-46 through 3.1-48; Section 2.4.1.3 and Section 3.2.4 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to substantially degrading the existing visual character or quality of public views of the site and its surroundings or conflicting with applicable zoning and other regulations governing scenic quality, would be less than significant.

2.3.1.3 Light and Glare

The Project would have less than significant impacts related to aesthetics with respect to the following significance threshold:

- Impact AES-4: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact

New nighttime light would primarily emanate from aboveground station areas, which would not substantially increase the amount of lighting in the immediate area because similar light sources and levels currently exist. Light from headlights on LRT vehicles are also not expected to extend beyond the public transportation-related ROW and its light intensity is expected to be comparable to existing vehicular traffic along surrounding roads. Operations would follow the MRDC and Metro's Systemwide Station Design Standards Policy. Compliance with these requirements would ensure that permanent operations-related light sources at the proposed station areas would be directed downwards or feature directional shielding to minimize spillover onto adjacent properties, including residential uses and other light-sensitive uses. Additionally, several elements that would create new sources of glare at proposed station areas during the day would be included. However, per Metro design criteria and standards, these sources would be dulled to ensure they are not substantial.

Nighttime construction lighting, if any, would be directed toward the construction areas and/or shielded with temporary screening to minimize light spillover and glare onto adjacent areas. Additionally, construction-related illumination would be temporary and limited to safety and security purposes. Construction would not be a substantial source of light and glare as several nighttime lighting sources already exist around the construction areas (e.g., streetlights, building illumination).

Reference

Section 3.1.6.4, Impact AES-4: Light and Glare, of the Recirculated Draft EIR, pages 3.1-51 through 3.1-52; Section 2.4.1.4 and Section 3.2.4 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area, would be less than significant.

2.3.2 Air Quality

2.3.2.1 Air Quality Plan

The Project would have less than significant impacts related to air quality with respect to the following significance threshold:

- Impact AQ-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Impact

Operation and construction of the Project would not introduce new population or housing growth, disproportionately contribute to the growth projections in the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) or 2016-2040 RTP/SCS, or delay the timely attainment of air quality standards or interim emission reductions specified in the Air Quality Management Plan (AQMP). Emissions would remain below applicable Southern California Air Quality Management District (SCAQMD) thresholds for all criteria pollutants during both construction and operation of the Project and would therefore not contribute to new air quality violations or an increase in the frequency or severity of existing air quality violations. The construction and subsequent operation of the Project would result in a reduction to regional passenger vehicle VMT of approximately 2,544,000 miles annually. The reduction in regional passenger vehicle VMT and associated criteria pollutants would be consistent with the VMT-reducing objectives of the AQMP.

Reference

Section 3.2.6.1, Impact AQ-1: Air Quality Plan, of the Recirculated Draft EIR, pages 3.2-22 through 3.2-23; Section 2.4.2.1 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts to air quality related to conflicting with or obstructing implementation of the applicable air quality plan, would be less than significant.

2.3.2.2 Regional Criteria Pollutant Emissions

The Project would have less than significant impacts related to air quality with respect to the following significance threshold:

- Impact AQ-2: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Impact

Operation of the Project would result in a net reduction in operational regional criteria air pollutant emissions. There would be a net reduction in operational regional emissions of carbon monoxide (CO), nitrogen oxides (NO_X), sulfur dioxide (SO_2), inhalable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) and a slight increase in emissions of volatile organic compounds (VOC). However, emissions of VOCs would be less than the SCAQMD threshold and impacts with respect to operational regional criteria pollutant emissions would be less than significant. Implementation of the Project would result in no meaningful change to operational regional criteria air pollutant emissions. Emission reductions would be driven by the reduction in motor vehicle VMT associated with ridership of the Metro E Line extension. Construction of the Project would result in peak daily regional emissions that would be less than the SCAQMD regional significance thresholds. Additional construction BMPs set forth in Metro's Green Construction Policy would further reduce construction-related emissions.

Reference

Section 3.2.6.2, Impact AQ-2: Regional Criteria Pollutant Emissions, of the Recirculated Draft EIR, pages 3.2-28 through 3.2-31; Section 2.4.2.2 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that impacts related to a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard, would be less than significant.

2.3.2.3 Localized Pollutant Concentrations

The Project would have less than significant impacts related to air quality with respect to the following significance threshold:

- Impact AQ-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Impact

Operation of the Project would reduce regional VMT, and therefore reduce traffic volumes at roadway intersections in the DSA. Certain local roadway intersections would see increased traffic volumes as a result of the Project. The highest-volume intersections identified in the DSA are the intersection of Pioneer Boulevard and Washington Boulevard with 6,070 vehicles per hour, and the intersection of Norwalk Boulevard and Washington Boulevard with 6,046 vehicles per hour. Since the highest-volume intersections identified in the DSA would have traffic volumes below that of the Bay Area Air Quality Management District (BAAQMD) screening threshold, the operation of the Project would not expose sensitive receptors to substantial CO concentrations and impacts with respect to operational localized criteria pollutant concentrations. Construction of the Project would result in localized criteria air pollutant emissions that would be less than the SCAQMD thresholds and impacts with respect to construction regional criteria pollutant emissions would be less than significant.

Reference

Section 3.2.6.3, Impact AQ-3: Localized Pollutant Concentrations, of the Recirculated Draft EIR, pages 3.2-35 through 3.2-37; Section 2.4.2.3 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to exposing sensitive receptors to substantial pollutant concentrations would be less than significant.

2.3.2.4 Other Emissions

The Project would have less than significant impacts related to air quality with respect to the following significance threshold:

- Impact AQ-4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact

Other operational emission sources with the potential to adversely affect a substantial number of people include waste from passengers accessing the stations. SCAQMD has established Rule 402 (Nuisance), which prevents nuisance odor conditions through the establishment of odor complaint tracking systems and other requirements. Trash receptacles at stations would be a relatively unsubstantial source of odors and would be subject to regular servicing, maintenance, and cleaning as to prevent unpleasant odors at the stations, and operations would not result in unpleasant odors that would affect a substantial number of people. Construction of the Project would occur over a broad area and would be completed in sequential segments; therefore, a receptor's exposure to potential unpleasant construction-related near-field odors, such as diesel vehicle exhaust, would be temporary and short-term and would not affect a substantial number of people.

Reference

Section 3.2.6.4, Impact AQ-4: Other Emissions, of the Recirculated Draft EIR, pages 3.2-39 through 3.2-40; Section 2.4.2.4 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts to air quality related to emissions (such as those leading to odors) adversely affecting a substantial number of people, would be less than significant.

2.3.2.5 Human Health Risks

The Project would have less than significant impacts related to air quality with respect to the following significance threshold:

- Impact HR-1: Would the Project expose sensitive receptors to TAC that would be likely to cause a substantial increase in human health risks?

Impact

Although emissions of VOCs would increase from the operation of the Project, exposure to toxic air contaminants (TAC) from VOCs for residents living and working within the DSA would not substantially increase. VOC emission increases would be driven by the use of low-TAC content consumer products, including cleaners, adhesives, and paints at the MSF. Additionally, the MSF site would be in an industrial areas away from residences and other sensitive receptors. High TAC-content VOC emissions, such as those from vehicle exhaust, would be decreased alongside PM_{10} emissions proportional to the regional reductions in VMT. Construction of the Project would result in local exposure to TAC that would be less than the SCAQMD Tier 2 screening criteria for acute, chronic, and carcinogenic exposure and impacts with respect to construction human health risk. Therefore, operation and construction of the Project would not expose sensitive receptors to TAC that would be likely to cause a substantial increase in human health risks.

Reference

Section 3.2.6.5, Impact HR-1: Human Health Risks, of the Recirculated Draft EIR, pages 3.2-44 through 3.2-46; Section 2.4.2.5 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts to human health risks related to exposing sensitive receptors to TAC that would be likely to cause a substantial increase in human health risks, would be less than significant.

2.3.3 Biological Resources

2.3.3.1 Riparian Habitat/Sensitive Natural Community

The Project would have less than significant impacts related to biological resources with respect to the following significance threshold:

- Impact BIO-2: 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 CDFW or USFWS?

Impact

The majority of areas that could be affected by the Project are developed and consist of structures, roads, parking lots, driveways, sidewalks, and other hardscaped areas. Further, the Project would not affect the rivers or spreading grounds where vegetation communities (e.g., trees grouped together to form a canopy) exist. Because construction would occur in developed or paved areas and would not affect vegetation communities, it is unlikely that construction of the Project would introduce or spread invasive plants or tree disease pathogens; the impact would be less than significant.

Reference

Section 3.3.6.2, Impact BIO-2: Riparian Habitat/Sensitive Natural Communities, of the Recirculated Draft EIR, pages 3.3-24 through 3.3-25; Section 2.4.3.2 and Section 3.2.5 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to the Project having a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS would be less than significant.

2.3.3.2 Policies and Ordinances

The Project would have less than significant impacts related to biological resources with respect to the following significance threshold:

- Impact BIO-4: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact

Trees along the proposed alignment and within proposed stations would be protected by local tree protection policies. No impacts on locally protected trees would occur during operation. Construction of the Project may require tree removal or trimming; however, it is not expected that all the trees along the alignment or within station footprints would be affected by construction. This work would be conducted in accordance with the LA Metro Tree Policy and local policies and municipal codes that protect both native trees and street trees. Additionally, any maintenance of LRT facilities that entails tree trimming would be conducted in accordance with the LA Metro Tree Policy and local policies and municipal codes that protect native trees and street trees. Therefore, no conflict with tree preservation policy or other local polices or ordinances protecting biological resources would occur.

Reference

Section 3.3.6.4, Impact BIO-4: Policies and Ordinances, of the Recirculated Draft EIR, pages 3.3-30 through 3.3-31; Section 2.4.3.4 and Section 3.2.5 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would be less than significant.

2.3.4 Energy

2.3.4.1 Energy Consumption

The Project would have less than significant impacts related to energy with respect to the following significance threshold:

- Impact ENG-1: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact

Operation of the Project would result in a net annual reduction in non-renewable energy consumption of 7.1 billion British thermal units (BTUs) relative to 2042 without Project Conditions. The Project would result in long-term beneficial impacts to energy resources through decreased reliance on non-renewable fossil fuels and increased reliance on the renewable grid energy supplies. Regional energy demand under the Project would be less than that under the 2019 existing conditions.

Construction of the Project would not cause a meaningful change to the consumption of energy resources. Specific energy conservation measures would be confirmed in final design consistent with Metro's 2011 *Energy Conservation and Management Plan* (ECMP) and 2013 *Sustainable Rail Plan*, as well as Metro's energy and environmental policies. Additional BMPs set forth in Metro's Green construction policy would further reduce energy consumption during construction. These BMPs include, but are not limited to: the required use of renewable diesel fuel in construction equipment; the required use of Tier 4 off-road emission standard equipment as regionally available; the required use of United States Environmental Protection Agency (USEPA) 2007 on-road emission standard compliant trucks; the limitation of vehicle idling to 5 minutes or fewer when not in use; and the use of grid-power in lieu of diesel generators where available.

Reference

Section 3.5.6.1, Impact ENG-1: Energy Consumption, of the Recirculated Draft EIR, pages 3.5-27 through 3.5-34; Section 2.4.5.1 and Section 3.2.7 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation, would be less than significant.

2.3.4.2 Energy Plans

The Project would have less than significant impacts related to energy with respect to the following significance threshold:

- Impact ENG-2: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact

The Project would contribute to a regional shift in transportation energy demand away from fossil fuels toward grid power. Stations, lighting in parking lots, and the MSF would be designed and constructed to achieve energy efficiency consistent with or exceeding Metro's and California Code of Regulations (CCR) Title 24 efficiency requirements. Further, the Project would, by its nature, enhance community access to public transit through the operation of the LRT. The Project would facilitate broader adoption of mass transit and contribute to regional VMT reductions, as projected in the 2020-2045 RTP/SCS. Therefore, the Project would not conflict with or obstruct the 2020-2045 RTP/SCS.

The Project would be constructed in a manner consistent with the regulations and efficiency requirements at the time of construction and would not conflict with Title 24. Metro's 2011 Green Construction Policy addresses the air quality implications of construction from Metro projects. From a construction energy perspective, the policy encourages the limiting of idling and the use of grid-

electric power when feasible during construction. Construction would be consistent with Metro's Green Construction Policy during construction.

Reference

Section 3.5.6.2, Impact ENG-2: Energy Plans, of the Recirculated Draft EIR, pages 3.5-38 through 3.5-39; Section 2.4.5.2 and Section 3.2.7 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to conflicting with or obstructing a state or local plan for renewable energy or energy efficiency, would be less than significant.

2.3.5 Geology, Seismicity, and Soil Resources

2.3.5.1 Exposure to Seismic Hazards

The Project would have less than significant impacts related to geology, seismicity, and soil resources with respect to the following significance threshold:

- Impact GEO-1: 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 (refer to Division of Mines and Geology Special Publication 42)
    - Strong seismic ground shaking
    - Seismic-related ground failure, including liquefaction
    - Landslides

Impact

The Project would be designed in compliance with regulatory requirements, industry standards, and the MRDC; compliance with these regulatory and design requirements would reduce impacts by ensuring that development is designed to withstand seismic or other geologic hazards. Operation and construction of the Project would not cause potential substantial adverse effects, including the risk of loss, injury, or death from known earthquake fault rupture, strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides.

Reference

Section 3.6.6.1, Impact GEO-1: Exposure to Seismic Hazards, of the Recirculated Draft EIR, pages 3.6-23 through 3.5-26; Section 2.4.6.1 and Section 3.2.8 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to directly or indirectly causing potential substantial adverse effects including the risk of loss, injury, or death from known earthquake fault rupture, strong seismic ground shaking, seismic-related ground failure, including liquefaction, and landslides, during project construction or operation, would be less than significant.

2.3.5.2 Soil Erosion

The Project would have less than significant impacts related to geology, seismicity, and soil resources with respect to the following significance threshold:

- Impact GEO-2: Would the Project result in substantial soil erosion or the loss of topsoil?

Impact

The Project is located in an urbanized area that is primarily impervious with no exposed soil. Operations would not result in ground disturbance or a change in the amount of exposed soil as compared to existing conditions. The Project would comply with post-construction measures in applicable National Pollutant Discharge Elimination System (NPDES) permits and low impact development (LID) standards required by Los Angeles County and other local jurisdictions, which aim to minimize erosion impacts from development projects.

Ground disturbing activities occurring during construction of the Project would temporarily expose surficial soils to wind and water erosion and have the potential to temporarily increase erosion and loss of topsoil. However, construction activities would be required to comply with existing regulatory requirements, including implementation of BMPs and other erosion and sedimentation control measures that would ensure grading, excavation, and other earth-moving activities would avoid a significant impact.

Reference

Section 3.6.6.2, Impact GEO-2: Soil Erosion, of the Recirculated Draft EIR, pages 3.6-29 through 3.6-30; Section 2.4.6.2 and Section 3.2.8 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to substantial soil erosion or the loss of topsoil during project construction or operation, would be less than significant.

2.3.5.3 Unstable Geologic Units or Soils

The Project would have less than significant impacts related to geology, seismicity, and soil resources with respect to the following significance threshold:

- Impact GEO-3: 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?

Impact

The Project would be located on stable soils where no liquefaction zones are present. Operations would not occur on a geologic unit or soil that is unstable, or that would become unstable, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The Project would be designed in compliance with MRDC, the California Seismic Hazards Mapping Act, industry standards and recommendations contained in the design level geotechnical report.

Construction activities, such as ground excavation, tunneling, and dewatering, could affect soil stability leading to ground movements (both lateral movements and settlements) or subsidence. However, the Project would be designed and constructed in compliance with regulatory requirements, the MRDC, and recommendations contained in the design level geotechnical report. This would include incorporating recommendations on engineering and design considerations identified in the geotechnical report to ensure soil stability during construction.

Reference

Section 3.6.6.3, Impact GEO-3: Exposure to Seismic Hazards, of the Recirculated Draft EIR, pages 3.6-34 through 3.6-36; Section 2.4.6.3 and Section 3.2.8 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts to related to potentially resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, during project construction or operation, would be less than significant.

2.3.5.4 Expansive Soils

The Project would have less than significant impacts related to geology, seismicity, and soil resources with respect to the following significance threshold:

- Impact GEO-4: Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the CBC, creating substantial direct or indirect risks to life or property?

Impact

Clay-rich soils that could swell and shrink with wetting and drying may exist locally within alluvial soils present along the Project. The change in soil volume is capable of exerting enough force on structures to damage foundations, structures, and underground utilities. Damage can also occur as these soils dry out and contract. Expansive soils could have an impact on project components, including the stations, guideway, tunnel, and other fixed structures; expansive soils do not have distinct construction or operational impacts and are addressed through project design. The Project would be designed and constructed in compliance with regulatory requirements. This includes the MRDC and recommendations contained in the design level geotechnical report.

Reference

Section 3.6.6.4, Impact GEO-4: Expansive Soils, of the Recirculated Draft EIR, page 3.6-38; Section 2.4.6.4 and Section 3.2.8 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to the Project being located on expansive soil, as defined in Section 1803.5.3 of the CBC, and therefore creating substantial direct or indirect risks to life or property, during project construction or operation, would be less than significant.

2.3.6 Greenhouse Gas Emissions

2.3.6.1 Emission Generation

The Project would have less than significant impacts related to greenhouse gas (GHG) emissions with respect to the following significance threshold:

- Impact GHG-1: Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact

The Project is a component of the RTP/SCS and contributes to California's goal to increase mass transit under the Assembly Bill (AB) 32 Scoping Plan. Operation of the Project would enhance regional transportation systems and contribute to planning efforts to reduce VMT and GHG emissions from transportation sources and would not alter the contribution to the state and regional mass transit climate strategies. Consistent with SCAQMD guidance, construction GHG emissions are amortized over the project lifetime, assumed to be 30 years, to be combined with annual operational emissions.

When amortized over 30 years, construction emissions would contribute an additional 192 metric tons carbon dioxide equivalent (CO_2e) per year. The Project's would be consistent with state and regional climate strategies to increase mass transit and the incremental contribution to climate change with amortized construction emissions would not have a significant impact on the environment.

Reference

Section 3.7.6.1, Impact GHG-1: Emission Generation, of the Recirculated Draft EIR, pages 3.7-29 through 3.7-39; Section 2.4.7.1 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to generating GHG emissions, either directly or indirectly, that may have a significant impact on the environment, during project construction or operation, would be less than significant.

2.3.6.2 Conflicts

The Project would have less than significant impacts related to greenhouse gas emissions with respect to the following significance threshold:

- Impact GHG-2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact

At the project-level, the implementation the Project would reduce regional VMT by 2,544,000 miles annually. The Project would support a larger regional effort to facilitate and enhance mass transit in the South Coast Air Basin (SoCAB). The Project is identified in the 2020 RTP/SCS as a major transit capital project and is included in the plan's regional growth and transportation projections. The Project would be consistent with the 2020-2045 RTP/SCS and other relevant GHG reduction plans in that it would support the VMT reduction strategies of those plans. Additionally, the Project, alongside other transit improvement projects planned to be implemented throughout the region, would facilitate broader adoption of mass transit and contribute to regional VMT reductions, and the associated GHG emission reductions, as projected in the 2020-2045 RTP/SCS.

Reference

Section 3.7.6.2, Impact GHG-2: Conflicts, of the Recirculated Draft EIR, pages 3.7-41 through 3.7-42; Section 2.4.7.2 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to conflicting with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, during project construction or operation, would be less than significant.

2.3.7 Hazards and Hazardous Materials

2.3.7.1 Transport, Storage, Use, or Disposal of Hazardous Materials

The Project would have less than significant impacts related to hazards and hazardous materials with respect to the following significance threshold:

- Impact HAZ-1: Would the Project create a significant hazard to the public or environment through the routine transport, storage, use, or disposal of hazardous materials?

Impact

Operation of the proposed stations and LRT guideway would involve the use of small amounts of hazardous substances such as oil, grease, solvents, paints, common cleaning materials, and pesticides. None of these substances would be acutely hazardous. Cleaning and maintenance products are required to be labeled with appropriate cautions and instructions for handling, storage and disposal, and do not represent a significant threat to human health and the environment. Staff would be required to use, store, and dispose of these materials properly in accordance with label directions. Maintenance of LRT trains, vehicles, and equipment would occur at the MSF site. Compliance with existing regulations would ensure proper transportation, use, and storage of hazardous materials.

Construction of the Project would require use of typical construction equipment (e.g., gasoline- or diesel-powered machinery) and vehicles containing fuel, oil, and grease, as well as use and transport of these materials. Limited quantities of certain hazardous materials such as paints, solvents, and glues would be used during construction. As required by law, Metro would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases. By implementing the SWPPP and associated BMPs, construction-related hazardous substances, such as oil and grease, would be managed through appropriate material handling and BMPs.

Transportation of hazardous materials, such as contaminated soils; hazardous building materials, including asbestos, lead, and PCBs; and other hazardous wastes would occur along designated truck routes within the Project corridor ROW and/or major streets connecting to construction staging areas and the nearest freeways. Given compliance with existing regulations, operation and construction of the Project would not create of significant hazards to the public through routine transport, storage, use, and disposal of hazardous materials.

Reference

Section 3.8.6.1, Impact HAZ-1: Transport, Storage, Use, or Disposal of Hazardous Materials, of the Recirculated Draft EIR, pages 3.8-31 through 3.8-33; Section 2.4.8.1 and Section 3.2.9 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to creating a significant hazard to the public or environment through the routine transport, storage, use, or disposal of hazardous materials, would be less than significant.

2.3.7.2 Hazardous Materials Within One-Quarter Mile of a School

The Project would have less than significant impacts related to hazards and hazardous materials with respect to the following significance threshold:

- Impact HAZ-3: 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?

Impact

Twelve schools have been identified as being located within one-quarter mile from the Project alignment and no schools are located with one-quarter mile of the MSF. Operation of the proposed stations and LRT guideway would involve the use of small amounts of hazardous substances such as oil, grease, solvents, paints, common cleaning materials, and pesticides. None of these substances would be acutely hazardous and staff would be required to use, store, and dispose of these materials properly in accordance with label directions.

Parcels proposed for construction staging and construction easements would occur on sites with known hazardous materials releases within one-quarter mile of Greenwood Elementary School (APNs 6352-007-059 and 6352-007-060 [Site 18]), KIPP Promesa Prep and KIPP Raices Academy (APN 6340-001-001 [Site 5] and APN 6340-001-002 [Site 6]), and 4th Street Elementary, Arts in Action Community Charter Elementary School, 4th Street Primary Center, and Esperanza College Prep (APNs 5248-004-040 and 5248-004-043 [Site 1], APN 6341-001- 038 [Site 2], APN 6341-001-017 [Site 3], and APN 5248-008-046 [Site 4]). By implementing the SWPPP and associated BMPs, construction-related hazardous substances, such as oil and grease, would be managed through appropriate material handling and BMPs as mandated by the State Water Resources Control Board (SWRCB) Construction General Permit. In addition, transportation of hazardous materials would comply with State regulations governing hazardous materials transport included in the California Vehicle Code (Title 13 of the California Code of Regulations), the State Fire Marshal Regulations (Title 19 of the California Code of Regulations), and Title 22 of the California Code of Regulations. Cooperation with the corridor cities would occur throughout the construction process. Adherence to federal and state regulations reduces the risk of exposure to hazardous materials. With compliance with existing regulations, operation and

construction of the Project would not create a risk related to the transportation, use, storage, and handling of hazardous materials within one-quarter mile of an existing school.

Reference

Section 3.8.6.3, Impact HAZ-3: Hazardous Materials Within One-Quarter Mile of A School, of the Recirculated Draft EIR, pages 3.8-48 through 3.8-49; Section 2.4.8.3 and Section 3.2.9 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, would be less than significant.

2.3.7.3 Emergency Response or Emergency Evacuation Plan

The Project would have less than significant impacts related to hazards and hazardous materials with respect to the following significance threshold:

- Impact HAZ-6: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact

The Project would have four at-grade crossings at signalized intersections and one pedestrian only at-grade crossing at Greenwood station. Emergency vehicles traveling on streets that cross the tracks at the at-grade crossings would experience short delays at intersections if emergency vehicles arrive at a crossing at the same time as a passing train. However, such delays would be brief due to the short length of the LRT trainsets and the short time required for LRT vehicles to enter and exit the crossings would reduce any delays. As standard practice, Metro would coordinate with fire and police protection officials when designing grade crossings to ensure that emergency access would be maintained. The Project would not impede with an adopted emergency response plan or emergency evacuation plan, and it would not affect emergency evacuation plans and roadway conditions as the roadway width and configuration would be kept accessible to emergency vehicles and fire equipment.

Construction of the Project could result in temporary lane closures, increased truck traffic, and other roadway effects that could slow emergency vehicles, temporarily increasing response times and impeding existing services. Construction activities would shift along the corridor so that overall construction activities should be of relatively short duration within each segment. For specialized construction tasks, it may be necessary to work during nighttime hours to minimize traffic disruptions. Additional specialized construction activities may require full street closures and therefore the development of detour routes, such as decking activities at Atlantic Boulevard for underground construction. Traffic control during construction would follow local jurisdiction guidelines. Metro standard practices require that lane and/or road closures are scheduled to minimize disruptions and that a Traffic Management Plan is prepared and approved in coordination with local fire and police

departments prior to construction including the development of detour routes to facilitate traffic movement. The nearest local first responders would be notified, as appropriate, of traffic control plans during construction to coordinate emergency response routing. Construction of the Project would not impair implementation of or physically interfere with any adopted emergency response or evacuation plans.

Reference

Section 3.8.6.6, Impact HAZ-6: Emergency Response or Emergency Evacuation Plan, of the Recirculated Draft EIR, pages 3.8-62 through 3.8-63; Section 2.4.8.6 and Section 3.2.9 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts to related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan, would be less than significant.

2.3.8 Hydrology and Water Quality

2.3.8.1 Groundwater Supplies and Recharge

The Project would have less than significant impacts related to hydrology and water quality with respect to the following significance threshold:

- Impact HWQ-2: 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?

Impact

The Project would notably change the amount of pervious surfaces that could interfere with groundwater recharge and it would not cross the Rio Hondo, Rio Hondo Spreading Grounds, or the San Gabriel River. The underground alignment would not affect groundwater movement or infiltration as it would likely be above the groundwater table. During project construction, dewatering activities have the potential to lower the groundwater table and contaminate groundwater resources. Dewatering activities have the potential to lower the groundwater table and contaminate groundwater resources. The majority of groundwater wells are located 0.4 miles or farther away from the Project. Thus, dewatering would not be expected to affect these groundwater wells. The closest groundwater well is approximately 200 feet west of the underground guideway. The depth of this well is approximately 200 feet below ground surface (bgs), which is well below the depth of the tunnel at 60 feet. Additionally, groundwater depths are relatively deep near the underground alignment, which would reduce the likelihood that groundwater would be encountered during construction of the tunnel. Since the water table would likely be below or at the lower level of construction activities, the amount

of water that would need to be extracted, cleaned, and disposed of during construction would be minimal.

Reference

Section 3.9.6.2, Impact HWQ-2: Groundwater Supplies and Recharge, of the Recirculated Draft EIR, pages 3.9-33 through 3.9-34; Section 2.4.9.2 and Section 3.2.10 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, would be less than significant.

2.3.8.2 Drainage Patterns

The Project would have less than significant impacts related to hydrology and water quality with respect to the following significance threshold:

- Impact HWQ-3: 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 a 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 off-site?

  iii) Exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Impact

Operation and construction of the Project would not cross the Rio Hondo, Rio Hondo Spreading Grounds, or the San Gabriel River and would not alter the course of any streams or river or require a Section 1602 Lake and Streambed Alteration Agreement with the California Department of Fish and Wildlife (CDFW).

The Project would result in a minimal increase in impervious surface, which could increase the rate or amount of stormwater runoff, and a minimal increase in impervious surface that could affect stormwater drainage by reducing the area that allows for infiltration and concentrating pollutants, which can be transferred into nearby waterbodies via stormwater runoff. Operations would comply with post-construction measures in applicable NPDES permits, LID standards, and local policies protecting water quality, and would be operated in compliance with Los Angeles County Department of Public Works and Metro drainage standards (MRDC 3.3.2 and 3.8).

Construction of the Project could increase erosion and sedimentation around construction and staging areas, particularly during ground disturbing activities, such as excavation and grading. To reduce potential impacts related to erosion and siltation, a SWPPP would be prepared in compliance with SWRCB's Construction General Permit, and an erosion and sediment control plan would be prepared in compliance with LARWQCB's MS4 permit. Further, the topography is relatively flat, which would minimize the risk of erosion and siltation impacts. Storm drains affected by the Project would be connected to municipal systems per MRDC 3.3.2 and 3.8. Drainage systems for the Project, including storm drains, would be constructed per MRDC Section 8.2.5. The contractor would be responsible for preparing the drainage and grading plans and obtaining approval of the plans prior to the start of construction.

Reference

Section 3.9.6.3, Impact HWQ-3: Drainage Patterns, of the Recirculated Draft EIR, pages 3.9-45 through 3.9-49; Section 2.4.9.3 and Section 3.2.10 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to substantially altering the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, would be less than significant.

2.3.9 Land Use and Planning

2.3.9.1 Established Community

The Project would have less than significant impacts related to land use and planning with respect to the following significance threshold:

- Impact LUP-1: Would the Project physically divide an established community?

Impact

The Project would primarily operate within or below the transportation ROW and acquired commercial and industrial property. During Project operations, adjacent land uses would continue to have access to the surrounding roadway, bicycle, and sidewalk network, and would continue to be accessible to users. Property acquisition would be generally limited to properties currently zoned for commercial or industrial uses, and only one sliver take along the frontage of a residential property would occur. The new uses would be materially consistent with existing commercial and industrial uses and the land use characteristics of the transportation corridor and the addition of permanent infrastructure associated with aboveground components of the Project would not physically divide existing neighborhoods,

communities, or land uses to the extent to which they would be disrupted or isolated. The MSF site would not require the closure of any primary vehicle routes critical to circulation within a community or between communities and it would be located primarily on existing parcels designated for industrial uses.

Street and sidewalk closures during construction would result in temporary limitations on movement for pedestrians, cyclists, and vehicles within and between local communities. However, closures would be temporary, periodic, and would not restrict access to or from any established communities. A Traffic Management Plan would be prepared to reduce the disruption caused by construction work zones. The property acquisition for construction under the Project would not affect vehicular, bicycle, or pedestrian access, and would not physically divide an established community.

Reference

Section 3.10.6.1, Impact LUP-1: Established Community, of the Recirculated Draft EIR, pages 3.10-12 through 3.10-14; Section 2.4.10.1 and Section 3.2.11 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to physically dividing an established community, during project construction or operation, would be less than significant.

2.3.9.2 Plan, Policy, or Regulation Conflicts

The Project would have less than significant impacts related to land use and planning with respect to the following significance threshold:

- Impact LUP-2: 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?

Impact

The Project would not conflict with local land use plans, policies, or regulations and would help achieve regional and local goals to improve transit and mobility in East Los Angeles and the cities of Commerce and Montebello. The Project would be supportive of plans, policies, and regulations encouraging circulation improvements, community access and development, and air pollutant emissions and GHG reductions. Construction would also be conducted in compliance with local land use plans and codes. No conflict with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect would occur.

Reference

Section 3.10.6.2, Impact LUP-2: Plan, Policy, or Regulation Conflicts, of the Recirculated Draft EIR, pages 3.10-22 through 3.10-24; Section 2.4.10.2 and Section 3.2.11 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to causing 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, during project construction or operation, would be less than significant.

2.3.10 Population and Housing

2.3.10.1 Unplanned Population Growth

The Project would have less than significant impacts related to population and housing with respect to the following significance threshold:

- Impact PPH-1: Would the Project induce substantial unplanned population growth in an area, either directly or indirectly?

Impact

Operation and construction of the Project would not result in substantial changes to the existing population in the GSA or DSA as it would not include development of new housing or businesses that would directly induce population growth. Implementation of the Project could indirectly affect growth and development in the DSA by providing enhanced transit connections that would make station areas more desirable locations for residences and businesses. This, in turn, could encourage growth and economic development in the surrounding communities. However, the Project would not independently stimulate development or change property values without enabling policy factors like public plans and policies that encourage development and control zoning. Housing and business development growth would be contingent upon local city zoning regulations and approval, which would consider consistency with local general plans and transit-oriented development (TOD) policies.

Reference

Section 3.12.6.1, Impact PPH-1: Unplanned Population Growth, of the Recirculated Draft EIR, pages 3.12-10 through 3.12-11; Section 2.4.12.1 and Section 3.2.13 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to inducing substantial unplanned population growth in an area, either directly or indirectly, during project construction or operation, would be less than significant.

2.3.11 Public Services and Recreation

2.3.11.1 Public Services

The Project would have less than significant impacts related to public services and recreation with respect to the following significance threshold:

- Impact PSR-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental 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, including fire protection, police protection, schools, parks, or other public facilities?

Impact

The Project would primarily operate within or below the transportation ROW and acquired commercial and industrial property and would not increase fire and police protection response times beyond acceptable levels or require new or physically altered fire or police protection facilities to maintain adequate service levels. Grade crossings could potentially delay fire and police protection vehicles if they arrive at a crossing at the same time as a passing train. However, such delays would be brief due to the short length of the LRT trainsets and the short time required for LRT vehicles to enter and exit the crossings. As standard practice, Metro would coordinate with fire and police protection officials when designing grade crossings to ensure that access for police and fire protection services is maintained. No physical alterations or disruptive impacts to the schools, parks, or public libraries on would occur. There would be no acquisitions or reduction of access to such facilities that would require alteration or new construction of parks and recreational facilities in order to maintain access. Further the Project would not result in substantial changes to the existing population that could alter the demand for public services.

Construction of the Project would potentially temporarily increase fire and police protection response times as a result of periodic construction-related street closures or detours. Metro would coordinate with staff of the East Los Angeles Sheriff Station in advance of any construction activities to preserve station access. Metro standard practices shall require that lane and/or road closures are scheduled to minimize disruptions and that a Traffic Management Plan is prepared and approved in coordination with local fire and police departments prior to construction. The nearest local first responders would be notified, as appropriate, of traffic control measures in the plan during construction to coordinate emergency response routing. With implementation of a construction Traffic Management Plan, fire and police protection response times during the construction period would be maintained at acceptable levels and would not require new or physically altered fire or police protection facilities.

During construction, no physical alterations would occur at nearby schools and parks and recreational facilities, nor would construction activities result in any loss of access to the parking lots and/or building entrance of these facilities. There would be no need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service levels.

Reference

Section 3.13.6.1, Impact PSR-1: Public Services, of the Recirculated Draft EIR, pages 3.13-17 through 3.13-20; Section 2.4.13.1 and Section 3.2.14 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to the provision of new or physically altered governmental facilities, the need for new or physically altered governmental 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, including fire protection, police protection, schools, parks, or other public facilities, during project construction or operation, would be less than significant.

2.3.11.2 Increased Recreation

The Project would have less than significant impacts related to public services and recreation with respect to the following significance threshold:

- Impact PSR-2: Would the Project increase 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?

Impact

The Project would not include residential uses that would result in increased demand for use of parks and recreational facilities, and therefore operational activities would not directly lead to the substantial physical deterioration of parks and recreational facilities. Construction activities would require intermittent sidewalk and lane closures and detours which could inhibit access to nearby park and associated recreational facilities. Metro standard practices include timing closures to minimize disruptions and developing a Traffic Management Plan for construction activities. It is anticipated that access to parks would be maintained during construction. Additionally, construction would not increase use of the parks and recreational facilities through population growth as a result of construction job opportunities.

Reference

Section 3.13.6.2, Impact PSR-2: Increased Recreation, of the Recirculated Draft EIR, pages 3.13-23 through 3.13-24; Section 2.4.13.2 and Section 3.2.14 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to increasing 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, during project construction or operation, would be less than significant.

2.3.12 Transportation and Traffic

2.3.12.1 Conflict with CEQA Guidelines

The Project would have less than significant impacts related to transportation and traffic with respect to the following significance threshold:

- Impact TRA-2: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact

Operation of the Project would result in reduced VMT (approximately 8,000 daily) compared to the No Project Alternative. Streamlining transit and active transportation projects aligns with each of the three statutory goals contained in SB 743 by reducing GHG emissions, increasing multimodal transportation networks, and facilitating mixed use development. Additionally, components of the Project would include new or modifications to existing traffic signals to accommodate light rail movements and traffic circulation patterns at intersections, enhancements to existing signalized crosswalks, and bicycle circulation and access amenities in immediate station areas. Thus, these changes would not lead to a substantial or measurable increase in vehicle travel.

Construction of Project would temporarily generate additional VMT related to construction work activities and the transport of excavated materials and construction equipment and supplies. This additional VMT would terminate upon completion of construction and would not be in effect during operation. Given the temporary nature of construction-related VMT and that construction-related traffic circulation changes (e.g., detours) would generally be localized to the work area, the Project construction would not conflict with CEQA Guidelines section 15064.3, subdivision (b).

Reference

Section 3.14.6.2, Impact TRA-2: Conflict with CEQA Guidelines, of the Recirculated Draft EIR, pages 3.14-32 through 3.14-33; Section 2.4.14.2 and Section 3.2.15 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to conflicting or being inconsistent with CEQA Guidelines section 15064.3, subdivision (b), would be less than significant.

2.3.12.2 Design Hazards or Incompatible Uses

The Project would have less than significant impacts related to transportation and traffic with respect to the following significance threshold:

- Impact TRA-3: 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)?

Impact

The Project would be constructed and operated within the existing street alignment and ROW for aerial and at-grade segments and would not substantially increase hazards due to a geometric design feature. Additionally, the short 0.1-mile at-grade segment east of the underground tunnel portal would not introduce a new hazard as the existing Metro E Line is already at-grade along this segment of 3rd Street. The Project would be designed, constructed, and operated per applicable State, Metro, and city design criteria and standards, including adherence to design codes and standards such as the California Division of Occupational Safety and Health Administration (Cal/OSHA), California Public Utilities Commission (CPUC), California Manual on Uniform Traffic Control Devices (CA MUTCD), and Metro safety and security programs and standards (i.e., MRDC and Metro Systemwide Station Design Standards Policy).

During construction, pedestrians, bicyclists, and motorists would experience temporary safety hazards in the DSA localized around construction activities. This would result from temporary lane closures and the number and proximity of people and vehicles adjacent to the construction activities around station location staging areas and aerial and at-grade guideway segments. The Project would comply with Cal/OSHA and Metro safety and security programs, which are designed to reduce potential impacts during construction to less than significant levels. Safety for pedestrians, multi-use trail users (i.e., hikers, bicyclists, equestrians), and motorists would be maintained during construction using signage, partial lane closures, and construction barriers.

Reference

Section 3.14.6.3, Impact TRA-3: Design Hazards or Incompatible Uses, of the Recirculated Draft EIR, pages 3.14-37 through 3.14-39; Section 2.4.14.3 and Section 3.2.15 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), would be less than significant.

2.3.12.3 Inadequate Emergency Access

The Project would have less than significant impacts related to transportation and traffic with respect to the following significance threshold:

- Impact TRA-4: Would the Project result in inadequate emergency access?

Impact

Operation of the Project would potentially increase fire and police protection response times as a result of response delays at new grade crossings. Grade crossings could potentially delay fire and police protection vehicles if they arrive at a crossing at the same time as a passing train. However, such delays would be less than delays from high traffic volumes due to the short length of the LRT trainsets and the short time required for LRT vehicles to enter and exit the crossings. Given that trains would be operating in exclusive street-running ROW at these locations, trains would clear signaled and unsignalized intersections more quickly to allow emergency vehicles to pass, as compared to vehicles in the thru-lanes which may not be able to clear the intersection as quickly due to traffic delays.

Although the transition from an at-grade to underground alignment along 3rd Street between La Verne Avenue and Woods Avenue is located directly in front of the East Los Angeles Sheriff Station and the Kaiser Permanente East Los Angeles Medical Offices, the Metro E Line already operates at-grade along this segment of 3rd Street and operation of the Project is unlikely to impact existing response times to/from the station or the Kaiser Permanente offices. As standard practice, Metro would coordinate with fire and police protection officials when designing grade crossings to ensure that access for police and fire protection services would be maintained. In addition, all new LRT facilities and crossings would be designed in accordance with MRDC, including Fire/Life Safety Criteria, to ensure safety and minimize potential hazards at all locations. Further, compliance with code requirements pertaining to emergency vehicle access and building standards also ensure that response times are maintained at acceptable levels.

A temporary construction easement on part of the Los Angeles County Fire Department (LACFD) Fire Station 50 parcel would be acquired for the purposes of general construction activities. However, access to the LACFD Fire Station 50 on Saybrook Avenue would be maintained during construction and the launch of the TBM. Metro would coordinate with staff of the East Los Angeles Sheriff Station and LACFD Fire Station 50 in advance of any construction activities to preserve station access. Metro standard practices require that lane and/or road closures are scheduled to minimize disruptions and that a Traffic Management Plan, including detours, is prepared and approved in coordination with local fire and police departments prior to construction.

Reference

Section 3.14.6.4, Impact TRA-4: Inadequate Emergency Access, of the Recirculated Draft EIR, pages 3.14-43 through 3.14-44; Section 2.4.14.4 and Section 3.2.15 of the Final EIR.

Mitigation Measures

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

Finding

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

2.3.13 Utilities and Service Systems

2.3.13.1 Relocation or Construction

The Project would have less than significant impacts related to utilities and service systems with respect to the following significance threshold:

- Impact UTL-1: 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?

Impact

The Project elements would result in a slight increase in water use; however, the amount consumed would be significantly less than the projected future capacity and would not have any substantial effect on the water supply. The Project would not have public restrooms and, as a result, would not generate wastewater. Elevators would have emergency ejector pits and underground stations and control rooms at at-grade stations would be equipped with sump pumps/clarifiers that would drain to the sewer in the event of a flood. Any discharges associated with these connections would be subject to a wastewater discharge permit and would be intermittent and irregular. Such irregular discharges, should they be necessary, would not exceed capacity. The Project would result in a minimal increase in impervious surfaces, but not to an extent that would lead to increased runoff. The Project elements (e.g., station entrance canopy) would include drainage facilities with adequate slopes to facilitate adequate drainage flow and help avoid localized ponding or flooding during storm events. The amount of electricity consumed would be significantly less than the projected future capacity, and the Project would not consume natural gas, and would not include telecommunication features that would require expansion of existing telecommunications facilities that could result in an environmental impact.

Reference

Section 3.16.6.1, Impact UTL-1: Relocation or Construction, of the Recirculated Draft EIR, pages 3.16-20 through 3.16-25; Section 2.4.16.1 and Section 3.2.17 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to requiring or resulting 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 be less than significant.

2.3.13.2 Water Supplies

The Project would have less than significant impacts related to utilities and service systems with respect to the following significance threshold:

- Impact UTL-2: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Impact

The Project would result in a minimal increase in municipal water use that would require long-term, permanent sources of water use that may include, but would not be limited to, fire water systems and landscape irrigation. This water demand would be a slight increase and would not affect water supplies. Further, any water use would comply with Metro's Water Use and Conservation Policy, which specifies that water efficiency and conservation methods would be adopted and maintained. Operational activities would not significantly deplete municipal water supplies during normal, dry, or multiple dry years. The amount of water used during construction would be highly variable; however, overall short-term use would require minimal water supplies when compared to regional water use associated with land use developments. Further, any water use would comply with Metro's Water Use and Conservation Policy, which limits use of potable water during construction when feasible. Construction-related water use would not necessitate new water deliveries to the region.

Reference

Section 3.16.6.2, Impact UTL-2: Water Supplies, of the Recirculated Draft EIR, pages 3.16-28 through 3.16-29; Section 2.4.16.2 and Section 3.2.17 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years, the construction or relocation of which could cause significant environmental effects, would be less than significant.

2.3.13.3 Wastewater

The Project would have less than significant impacts related to utilities and service systems with respect to the following significance threshold:

- Impact UTL-3: 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?

Impact

The Project would not include a new source of wastewater and would not directly generate population growth that would require wastewater services. Restrooms would not be provided at LRT stations. Elevators would have emergency ejector pits and underground stations and control rooms at at-grade stations would be equipped with sump pumps/clarifiers that would drain to the sewer in the event of a flood. Any discharges associated with these connections would be subject to a wastewater discharge permit and would be intermittent and irregular. Such irregular discharges, should they be necessary, would not exceed capacity. Wastewater generation during construction would be negligible in relation to the size and capacity of the wastewater treatment system and would not overburden the system.

Reference

Section 3.16.6.3, Impact UTL-3: Wastewater, of the Recirculated Draft EIR, pages 3.16-31 through 3.16-32; Section 2.4.16.3 and Section 3.2.17 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to wastewater capacity would be less than significant.

2.3.13.4 Solid Waste

The Project would have less than significant impacts related to utilities and service systems with respect to the following significance threshold:

- Impact UTL-4: 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?

Impact

The Project would not include a direct source of solid waste. Indirectly, solid waste would be generated by transit users. Stations would include waste bins and recycle bins. The disposal of solid waste from each station would have no notable potential to affect landfill capacity or impair attainment of solid waste reduction goals. Construction would not generate solid waste in excess of state or local

standards, respectively, or in excess of the capacity of the local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Furthermore, construction would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Reference

Section 3.16.6.4, Impact UTL-4: Solid Waste, of the Recirculated Draft EIR, pages 3.16-36 through 3.16-37; Section 2.4.16.4 and Section 3.2.17 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to the generation of solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or that could otherwise impair the attainment of solid waste reduction goals, the construction or relocation of which could cause significant environmental effects, would be less than significant.

2.3.13.5 Solid Waste Regulations

The Project would have less than significant impacts related to utilities and service systems with respect to the following significance threshold:

- Impact UTL-5: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact

The Project would be required to comply with all applicable federal, state, and local statutes and regulations pertaining to solid waste disposal. Small amounts of solid waste would be generated during operation and construction of the Project; however, there is no element of operational or construction activities that would be outside of compliance.

Reference

Section 3.16.6.5, Impact UTL-5: Relocation or Construction, of the Recirculated Draft EIR, page 3.16-39; Section 2.4.16.5 and Section 3.2.17 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste would be less than significant.

2.3.14 Growth Inducing Impacts

2.3.14.1 Growth Inducement

The Project would have less than significant impacts related to population and housing with respect to the following significance threshold:

- Impact GRW-1: Would the Project foster economic or population growth or the construction of additional housing either directly or indirectly; encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively?

Impact

The Project would not result in substantial changes to the existing population in the GSA or DSA. The Project would not include development of new housing or businesses that would directly induce population growth. The Project is not designed to induce growth; rather, the intent is to improve transit service to help accommodate the forecasted growth in the region's population and workforce. While development would not be induced, there are opportunities where the Project could serve as a "catalyst" for economic revitalization and growth in areas where development has already occurred at station locations and other public/private TOD opportunities along the proposed alignment. Given that the Project is anticipated in the local communities planning documents, TOD would not generate new unplanned growth, but instead would redistribute forecasted growth of a jurisdiction. Metro would coordinate with local jurisdictions to develop new corridor-wide governance strategies and implement plans, policies, and economic development strategies to transform station areas into equitable, sustainable, and safe areas for development in the Project corridor. Such future planned densification of land uses is also incorporated into the forecasted SCAG growth data and is not considered unplanned growth. TOD planning would not generate new unplanned growth, but instead would redistribute forecasted growth of a jurisdiction. This would also support Metro's Equity Platform by enhancing areas surrounding the proposed stations to accommodate all levels of access and income.

Reference

Section 3.17.6.1, Impact GRW-1: Growth Inducement, of the Recirculated Draft EIR, pages 3.17-14 through 3.17-17; Section 2.4.17.1 and Section 3.2.18 of the Final EIR.

Mitigation Measures

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

Finding

For the reasons stated above, Metro finds that these impacts related to fostering economic or population growth or the construction of additional housing either directly or indirectly; encouraging and facilitating other activities that could significantly affect the environment, either individually or cumulatively, during project construction or operation, would be less than significant.

2.4 Environmental Resources Found Not to be Impacted

2.4.1 Aesthetics

2.4.1.1 Scenic Highways

The Project would have no impacts related to aesthetics with respect to the following significance threshold:

- Impact AES-2: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact

The Project is not within the viewshed of State Route 2 (SR-2), the closest state designated scenic highway, and would largely operate underground with a short at-grade segment aerial segment. Therefore, operation and construction of the Project would not damage any scenic resources (e.g., trees, rock outcroppings, or historic buildings) within the viewshed of a state scenic highway.

Reference

Section 3.3.6.3, Impact AES-2: Scenic Highways, of the Recirculated Draft EIR, page 3.1-32; Section 3.2 and 3.3 of the Final EIR; Section 2.4.1.2 and Section 3.2.4 of the Final EIR.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to substantially damaging scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

2.4.2 Biological Resources

2.4.2.1 Movement of Fish and Wildlife Species

The Project would have no impacts related to biological resources with respect to the following significance threshold:

- Impact BIO-3: 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?

Impact

The Project does not cross the Rio Hondo, San Gabriel River, other aquatic corridors, or established terrestrial wildlife corridors. Thus, there would be no impacts on the movement of fish and wildlife species from operation or construction.

Reference

Section 3.3.6.3, Impact BIO-3: Movement of Fish and Wildlife Species, of the Recirculated Draft EIR, pages 3.3-27 to 3.3-28; Section 2.4.3.3 and Section 3.2.5 of the Final EIR.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or nursery sites.

2.4.2.2 Wetlands

Impact

Appendix G of the State CEQA Guidelines includes a significance criterion for impacts on state or federally protected wetlands. Based on the focused wetland investigation described in the Recirculated Draft EA, no wetlands occur within the BRSA for the Project. Therefore, no impacts on wetlands would occur from operation or construction of the Project and this criterion was not evaluated.

Reference

Section 3.3.4, Thresholds of Significance, of the Recirculated Draft EIR, page 3.3-7.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to state or federally protected wetlands.

2.4.2.3 Conflicts with Plans

Impact

Appendix G of the State CEQA Guidelines includes a significance criterion for impacts relating to the potential for a project to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Project is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan such as a Significant Ecological Area; therefore, this criterion is not applicable and was not evaluated.

Reference

Section 3.3.4, Thresholds of Significance, of the Recirculated Draft EIR, page 3.3-8.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

2.4.3 Geology, Seismicity, and Soil Resources

2.4.3.1 Septic Tanks or Alternative Wastewater Disposal Systems

Impact

Appendix G of the State CEQA Guidelines includes a significance criterion for impacts relating to the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The Project is in an urban area with an established sewer system. There are no existing or proposed septic tanks or other alternative wastewater disposal system associated with the Build Alternatives; therefore, this criterion is not applicable.

Reference

Section 3.6.4, Thresholds of Significance, of the Recirculated Draft EIR, page 3.6-5.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to septic tanks or alternative wastewater disposal systems.

2.4.4 Hazards and Hazardous Materials

2.4.4.1 Airport Land Use Plans

The Project would have no impacts related to hazards and hazardous materials with respect to the following significance threshold:

- Impact HAZ-5: Would the Project create a safety hazard for people residing or working in the Project Area 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, or a private airstrip?

Impact

The Project is not within two miles of a public airport or public use airport, or a private airstrip and there are no applicable airport land use plans. The nearest public airport or airstrip is Whittier Air Strip, which is over four miles to the north.

Reference

Section 3.8.6.5, Impact HAZ-5: Airport Land Use Plans, of the Recirculated Draft EIR, page 3.8-58; Section 2.4.8.5 and Section 3.2.9 of the Final EIR.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to creating a safety hazard for people residing or working in the Project Area 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, or a private airstrip.

2.4.4.2 Wildland Hazards

The Project would have no impacts related to hazards and hazardous with respect to the following significance threshold:

- Impact HAZ-7: Would the Project 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 Project would be located in a highly developed urbanized area that is not susceptible to wildland fires. Therefore, operation and construction of the Project would not expose people or structures to a substantial risk of loss, injury, or death involving wildland fires.

Reference

Section 3.8.6.7, Impact HAZ-7: Wildland Hazards, of the Recirculated Draft EIR, page 3.8-65; Section 2.4.8.7 and Section 3.2.9 of the Final EIR.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not 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.

2.4.5 Hydrology and Water Quality

2.4.5.1 Drainage Patterns

The Project would have less than significant impacts related to hydrology and water quality with respect to the following significance threshold:

- Impact HWQ-3: 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) Impede or redirect flood flows?

Impact

The Project alignment is entirely within an area of minimal flood risk (Federal Emergency Management Agency [FEMA]-defined flood zone X). The MSF is located in a FEMA-defined 100-year flood zone. This location was historically a rock quarry that collected stormwater and flooded. However, the area has since been developed and no longer floods as stormwater is directed in the municipal stormwater management system. Furthermore, the MSF does not contain any natural functions or values of a floodplain. Thus, construction or operation of the Project and MSF would not impede or redirect flood flows and no impacts would occur.

Reference

Section 3.9.6.3, Impact HWQ-3: Drainage Patterns, of the Recirculated Draft EIR, pages 3.9-46 through 3.9-50; Section 2.4.9.3 and Section 3.2.10 of the Final EIR.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to substantially altering the existing drainage pattern of the site or area, in a manner which would impede or redirect flood flows.

2.4.5.2 Inundation

The Project would have no impacts related to hydrology and water quality with respect to the following significance threshold:

- Impact HWQ-4: Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact

The Project is not within the limits of flood hazard, tsunami, or seiche zones. Thus, there would be no potential for the operation or construction of the Project to release pollutants during inundation and no impacts would occur.

Reference

Section 3.9.6.4, Impact HWQ-4: Inundation, of the Recirculated Draft EIR, page 3.9-52 through 3.9-53; Section 2.4.9.4 and Section 3.2.10 of the Final EIR.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to the release of pollutants from being located in flood hazard, tsunami, or seiche zones.

2.4.6 Noise

2.4.6.1 Airports

Impact

Appendix G of the State CEQA Guidelines includes a significance criterion for impacts relating to a project located within the vicinity of private airport airstrip or an airport land use plan, or that is located within two miles of public airport that does not have an adopted airport land use plan. The

nearest public airport or airstrip to the Project is Whittier Air Strip, which at the nearest point is over four miles to the north; therefore, this criterion is not applicable and was not evaluated.

Reference

Section 3.11.4, Thresholds of Significance, of the Recirculated Draft EIR, page 3.11-13 through 3.11-14.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts from being located within the vicinity of a private airport airstrip or an airport land use plan, or from being located within two miles of public airport that does not have an adopted airport land use plan.

2.4.7 Population and Housing

2.4.7.1 Displacement

The Project would have less than significant impacts related to population and housing with respect to the following significance threshold:

- Impact PPH-2: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact

Operation and construction of the Project would occur within the transportation ROW and at the new stations. No acquisition of residential structures would occur, and no people or housing would be displaced.

Reference

Section 3.12.6.2, Impact PPH-2: Displacement, of the Recirculated Draft EIR, pages 3.12-13; Section 2.4.12.2 and Section 3.2.13 of the Final EIR.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to displacing substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

2.4.8 Public Services and Recreation

2.4.8.1 New Recreation Facilities

The Project would have less than significant impacts related to public services and recreation with respect to the following significance threshold:

- Impact PSR-3: 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?

Impact

No new recreational facilities, or expansion of existing recreational facilities, would be included as part of the operation and construction of the Project.

Reference

Section 3.13.6.3, Impact PSR-3: New Recreation Facilities, of the Recirculated Draft EIR; Section 2.4.13.3 and Section 3.2.14 of the Final EIR.

Mitigation Measures

No impacts would occur and mitigation measures are not required.

Finding

For the reasons stated above, Metro finds that the Project would not result in impacts related to including recreational facilities or requiring the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

2.5 Cumulative Impacts

As required by CEQA Guidelines Section 15130, the impact analysis in the EIR considers the individual and cumulative environmental effects of the Project. This analysis is a two-step process. The first step is to determine whether or not the combined effects from the Project and related projects would result in a potentially significant cumulative impact. If the answer is no, then the EIR only briefly needs to indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. If the answer is yes, then the analysis proceeds to the second step, which is to determine whether the Project's incremental effects are cumulatively considerable, and therefore significant.

CEQA Guidelines Section 15065(a)(3) defines "cumulatively considerable" to mean that 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. The cumulative analysis for the Project considers the 2020–2045 RTP/SCS, the Metro Vision 2028 Strategic Plan, Metro's 2020 LRTP, Metro's NextGen Bus Study, and the City's Sidewalk and Transit Amenity Program. Cumulative impacts are address in Section 3.18 of the Recirculated Draft EIR.

Metro finds that cumulative impacts related to Aesthetics, Air Quality, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services and Recreation, Utilities and Service Systems, would not be significant. With implementation of mitigation measures, the Project's contribution to cumulative impacts related to Biological Resources, Cultural Resources, Noise and Vibration, Transportation and Traffic, and Tribal Cultural Resources would not be cumulatively considerable after mitigation. Thus, these impacts would be less than significant and are not discussed further below.

As discussed above, even with implementation of MM GEO-1 through MM GEO-5, there would be a significant cumulative impact related to paleontological resources. The incremental impact from the Project would be cumulatively considerable and discussed further below.

2.5.1 Geology, Seismicity, Soils, and Paleontological Resources

Impact

Due to the unique nature of sub-grade tunnel boring activity, there would be no feasible way to monitor or mitigate paleontological impacts from boring and impacts with respect to paleontological resources would be significant. Other construction activities, including cut-and-cover construction of underground stations and the installation of support footings along the aerial guideway, would also have the potential to result in significant impacts to paleontological resources, although mitigation measures would be adopted to reduce the impact from cut-and-cover construction and aerial guideway footing construction. The significant impact from tunnel boring activities could not be reduced by mitigation measures and would remain significant and unavoidable. Several of the related land development projects involve ground excavation and disturbance; however, none involve tunnel boring or excavation at the same depth as the Project. Project-level mitigation measures would be implemented to lessen the significant Project-level impact; however, the impact would remain significant. Considered cumulatively with related transportation and land development plans and projects, and even with implementation of MM GEO-1 through MM GEO-5, there would be a significant cumulative impact, which would be cumulatively considerable.

Finding

Significant impacts on paleontological resources in areas that can be monitored would be mitigated through implementation of mitigation measures MM GEO-1 through MM GEO-4 requiring a qualified paleontologist to monitor excavation in areas identified as likely to contain paleontological resources and making certain that recovered specimens be prepared for permanent preservation and curated into an appropriate repository in compliance with the PRMMP. However, for the reasons stated above regarding use of a TBM, there is no known way to monitor tunnel boring impacts on paleontological resources. For the reasons discussed above, Metro finds that these cumulative impacts related to paleontological resources during tunnel boring would be significant and unavoidable. No feasible mitigation measures exist to mitigate these impacts. Thus, for areas that can be monitored, as identified in Section 1.2 above and in Section 15091(a)(1) of the CEQA Guidelines, Metro adopts CEQA Finding 1 that changes or alterations that have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect on paleontological resources in areas that can be monitored, and for areas where the TBM would be used and monitoring is not

feasible, Metro adopts CEQA Finding 3 that specific technological considerations make mitigating the impacts on paleontological impacts from the TBM infeasible.

3. ALTERNATIVES, OPTIONS, AND MITIGATION MEASURES

3.1 Alternatives

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. The Recirculated Draft EIR examined four alternatives in detail: the No Project Alternative described in Section 5.5 of the Recirculated Draft EIR, and three Build Alternatives: Alternative 1 Washington (Alternative 1), Alternative 2 Atlantic to Commerce/Citadel Initial Operating Segment (IOS) (Alternative 2), and Alternative 3 Atlantic to Greenwood IOS (Alternative 3) analyzed in Chapters 3, 4, and 5. The Final EIR provided further analysis of Alternative 1 and Alternative 3 with design refinements in Chapter 2. Alternative 3 with the incorporation of design options is also referred to herein as the Project or LPA.

Alternative 1 has the longest alignment at approximately 9.0 miles. Additionally, two IOS alternatives were evaluated in the Recirculated Draft EIR (Alternative 2 and Alternative 3). An IOS is a segment of the project alignment that can function as a stand-alone project, independent on other segments or phases to be constructed. The purpose of developing and evaluating the IOS alternatives is to identify a segment of the Build Alternative that can provide a cost-effective solution due to timing of funding availability with the greatest benefit of the Project. Alternative 2 and Alternative 3 are IOSs and would run along the same alignment and have the same LRT design features and operating characteristics as the full-length Alternative 1. Each of the IOS alternatives would therefore possess a smaller project footprint than Alternative 1.

The EIR also considered design options for each Build Alternative: the Atlantic/Pomona Station Option and the Montebello At-Grade Option for Alternatives 1 and 3 and the Atlantic/Pomona Station Option for Alternative 2. The EIR also considered two MSF site options for Alternative 1 and Alternative 3: the Montebello MSF in the city of Montebello or the Commerce MSF in the city of Commerce. Alternative 2 would only use the Commerce MSF site option.

In December 2022, the Metro Board selected Alternative 3 as the LPA (Project) with the Atlantic/Pomona Station Option, the Montebello At-Grade Option, and the Montebello MSF.

3.1.1 Prior Analysis of Alternatives

Pursuant to CEQA Guidelines Section 15126.6(c), Section 5.3 of the Recirculated Draft EIR discussed additional concepts and alternatives that were considered but withdrawn. The evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration has had a long history in the development of the Project. This includes alternative alignments that were considered but withdrawn for factors that include conflicts with existing utilities, sensitive land uses, MSF size limitations, amount of property acquisitions needed,

and engineering constraints. A detailed description of concepts and alternatives considered and withdrawn is provided in Chapter 5 and Appendix T of the Recirculated Draft EIR.

3.1.2 No Project Alternative

The No Project Alternative would maintain existing transit service through the year 2042. The No Project Alternative assumes that no new transportation infrastructure would be built within the GSA aside from projects currently under construction or funded for construction and operation by 2042 via the 2008 Measure R or 2016 Measure M sales taxes. The No Project Alternative would include highway and transit projects identified for funding in Metro's 2020 LRTP and the SCAG 2020-2045 RTP/SCS.

The No Project Alternative includes existing projects from the regional base year (2017) and planned regional projects in operation in the horizon year (2042). As such, the planned regional transit projects assumed in operation by 2042 include:

- Metro L (Gold) Line Foothill Extension to Claremont
- West Santa Ana Transit Corridor LRT from Artesia to Downtown LA
- Airport Metro Connect 96th Street Station/Metro C Line Extension LAX
- Metro C (Green) Line Extension to Crenshaw Blvd in Torrance – Redondo Beach to Torrance Transit Center
- Metro K (Crenshaw/LAX) Line
- Vermont Transit Corridor BRT – Hollywood Blvd to 120th Street
- Metro D (Purple) Line Extension
- East San Fernando Valley (SFV) Transit Corridor Project connecting Metro G (Orange) Line Van Nuys Station to the Sylmar/San Fernando Metrolink Station
- Metro G Line BRT Improvements
- North Hollywood to Pasadena BRT
- Sepulveda Pass Transit Corridor from Metro E (Expo) Line to East San Fernando Valley Line (Phase 1 and 2)
- Metro Regional Connector Transit Project

3.1.2.1 Reference

Section 5.5 of the Recirculated Draft EIR, Section 9 of Appendices B through R of the Recirculated Draft EIR.

3.1.2.2 Findings for the No Project Alternative

The Metro Board finds that specific economic, legal, social, technological, or other considerations make infeasible the No Project Alternative. The No Project Alternative would not result in the same significant environmental impacts of the Project; however, the No Project Alternative would result in a greater number of different significant and unavoidable impacts to environmental resources than the Project. This is because the No Project Alternative would be inconsistent and conflict with regional and local programs, plans, ordinances, and policies related to air quality, GHG, Land Use, and transportation. The No Project Alternative would also not achieve or address any of the Project objectives or benefits since it would not include a new rail service in East Los Angeles County. The No Project Alternative would not help to address the region's mobility challenges by providing improved transit access and enhanced regional connectivity that would occur with the Build Alternatives. Additionally, the No Project Alternative would not achieve the reduced VMT and associated air quality and reduction in GHG emissions, or enable local jurisdictions to address their transit-oriented community goals and provide equitable development opportunities. Under the No Project Alternative, transit travel times will increase due to the expected growth in traffic volumes, which will contribute to slower bus and vehicle operating speeds and result in increased travel times. Therefore, the No Project Alternative would not be consistent with the goals and objectives for the Project.

3.1.3 Alternative 1

Alternative 1 has the longest alignment at approximately 9.0 miles with seven stations and two MSF site options, terminating at an at-grade Lambert station in the city of Whittier. The base Alternative 1 includes the relocation and reconfiguration of the existing Atlantic Station to an underground center platform station located beneath Atlantic Boulevard south of Beverly Boulevard in East Los Angeles and six new stations (two underground: Atlantic/Whittier, Commerce/Citadel; one aerial: Greenwood; and three at-grade: Rosemead, Norwalk, and Lambert). The base Alternative 1 consists of 3.0 miles of tunnel, 1.5 mile of aerial, and 4.5 miles of at-grade alignment. The base Alternative 1 also includes MSF site options in the city of Commerce or the city of Montebello which both have aerial lead tracks to the MSF. Alternative 1 has two design options with station and alignment variations: the Atlantic/Pomona Station Option and the Montebello At-Grade Option. The Atlantic/Pomona Station Option would relocate the existing Atlantic Station to an underground station between Atlantic Boulevard, Pomona Boulevard and Beverly Boulevard. The Montebello At-Grade Option is an at-grade guideway design option along Washington Boulevard between Yates Avenue and Carob Way in the city of Montebello. This design option would include an at-grade Greenwood station and the Montebello MSF At-Grade Option, which consists of at-grade lead tracks to the Montebello MSF site option if the Montebello MSF site option is selected.

3.1.3.1 Reference

Sections 3.1 through Section 3.18, Chapter 4, and Chapter 5 of the Recirculated Draft EIR, Chapter 2 of the Final EIR.

3.1.3.2 Findings for Alternative 1

The Metro Board finds that specific economic, legal, social, technological, or other considerations make infeasible Alternative 1. Alternative 1 would result in the greatest amount of project benefits by

having the longest alignment and thereby providing a transit linkage to the greatest number of communities and having the largest ridership. Therefore, Alternative 1 most fully meets Project objectives of all the Build Alternatives, including enhancing regional connectivity and air quality goals, providing improved mobility options, improving transit access to activity centers and employment, enabling the greatest number of jurisdictions to address TOD and equity goals, and improving accessibility and connectivity to TOD communities. Additionally, operation of the base Alternative 1 would result in the greatest reduction of VMT (approximately 10,000 daily trips) compared to the No Project Alternative. Alternative 1 is also compatible with the Montebello MSF, so with implementation of that MSF site option, a significant unavoidable impact on Cultural Resources would be avoided (see **Section 3.2.3.1**). Alternative 1, as with Alternatives 2 and 3, would include the underground construction and use of the TBM, which would result in a significant and unavoidable impact on paleontological resources.

Although, Alternative 1 has the greatest benefits associated with VMT and transit connectivity, it would require the largest challenge for securing sufficient funding to construct the full alignment in one phase, and it would also result in the largest need for coordination and permitting with multiple federal, state, and local agencies. Alternative 1 crosses the Rio Hondo and its spreading grounds and the San Gabriel River which would require the replacement of two existing bridges on Washington Boulevard. The bridge reconstruction would involve the need for a shared funding agreement and coordination with the city of Pico Rivera, where the bridges are located. Further, the bridge removal and reconstruction would involve work within the river channels and spreading grounds that would require regulatory agency coordination with and permitting from the United States Army Corps of Engineers, CDFW, Los Angeles County Flood Control District, and DPR. Alternative 1 would also cross underneath Interstate (I)-605 and involve construction work within the California Department of Transportation (Caltrans) ROW, which would also require coordination with and issuance of permits from Caltrans. The additional need for coordination and permitting required for construction of Alternative 1 is likely to involve longer lead times for review and agency agreements that would extend the overall project design time and costs, which could ultimately delay the schedule and extend the future date of operation.

Further, compared to Alternative 2 and 3, Alternative 1 would require mitigation to address significant impacts in the areas of biological resources and hydrology and water quality as it would cross the San Gabriel River and the Rio Hondo river channel and spreading grounds. Alternative 1 would also require additional mitigation related to cultural resources to address significant impacts associated with a sliver take at the Dal Rae Restaurant. Additionally, because Alternative 1 includes a longer alignment than Alternative 2 and Alternative 3, the impacts associated with its construction would be greater as it would affect a larger area. Because Alternative 1 is a longer alignment, while many of the same mitigation measures apply to all of the Build Alternatives that reduce impacts to less than significant, there is a greater number of properties and public rights-of-way with impacts that must be mitigated under Alternative 1. For example, mitigation measures to address noise and vibration impacts apply to 70 sensitive receivers compared to 29 sensitive receivers under Alternative 3; construction impacts associated with rerouting transit, traffic, bicycle and pedestrian facilities apply to a greater number of routes and facilities under Alternative 1; and mitigation measures to address impacts to paleontological resources, tribal cultural resources, hazardous materials, migratory birds and spread of invasive plants apply to a greater area under Alternative 1.

Therefore, while overall objectives would be fully met once Alternative 1 is constructed, the timeframe for completing the Alternative 1 would be greater due to funding and coordination requirements. This would delay the benefits and the meeting of objectives beyond the timeframe for completing Alternative 2 and Alternative 3. Further, Alternative 1 would result in a greater number of significant but

mitigable impacts than Alternative 2 and Alternative 3. With implementation of the Montebello MSF, Alternative 1, as with Alternative 3, would avoid a significant unavoidable impact.

3.1.4 Alternative 2

Alternative 2 is primarily underground and has the shortest alignment at approximately 3.2 miles in length with three stations and one MSF site option (the Commerce MSF site option). It would terminate at the underground Commerce/Citadel station with non-revenue aerial lead tracks extending to the Commerce MSF site option. Alternative 2 has one design option with station and alignment variations: the Atlantic/Pomona Station Option. The Atlantic/Pomona Station Option would relocate the existing Atlantic Station to an underground station between Atlantic Boulevard, Pomona Boulevard and Beverly Boulevard.

3.1.4.1 Reference

Sections 3.1 through Section 3.18, Chapter 4, and Chapter 5 of the Recirculated Draft EIR.

3.1.4.2 Findings for Alternative 2

The Metro Board finds that specific economic, legal, social, technological, or other considerations make infeasible Alternative 2. Alternative 2 has the shortest alignment and would provide the fewest benefits of the Build Alternatives because it would connect fewer communities to transit and also have the lowest ridership. The shorter alignment would also have an additional significant unavoidable impact and lesser environmental benefits, including a smaller reduction of VMT and associated reduction of operational air quality emissions, GHG emissions, fuel consumption, and traffic congestion. The Base Alternative 2 would result in reduced VMT (approximately 5,000 daily) compared to the No Project Alternative. For comparison, the Alternative 1 would result in VMT reduction or 10,000 daily trips and the Alternative 3 would result in VMT reduction of 8,000 daily trips.

Alternative 2 would have reduced construction impacts due to having a smaller footprint as compared to Alternative 1 and Alternative 3 and because much of the construction would occur underground and not within ROWs. Furthermore, it would not affect rivers or bridges, which would reduce impacts and required coordination as compared to Alternative 1. However, Alternative 2 would still include the underground construction and use of the TBM, which would result in significant and unavoidable impacts on paleontological resources. It would also not substantially reduce the construction time as compared to the Alternative 1 and Alternative 3 as the underground portion is the schedule's critical path for all Build Alternatives.

Due to the Alternative's termination in the city of Commerce, the Commerce MSF site option is the only MSF site available under Alternative 2. Construction of the Commerce MSF site option would result in significant and unavoidable impacts to cultural resources due to the removal of properties within the potential Vail Field Industrial Addition historic district. Therefore, Alternative 2 with the Commerce MSF site option would result in an additional significant unavoidable impact to cultural resources.

While Alternative 2 would meet most of the objectives of the Project, the objectives would be better met by Alternatives 1 and 3 which would provide greater mobility benefits and VMT reductions while

also avoiding a significant and unavoidable impact to cultural resources if the Montebello MSF site option is implemented.

3.1.5 Alternative 3

Alternative 3, which with the incorporation of design options is also referred to herein as the Project or LPA, is a 4.6 mile alignment with three new stations: Atlantic/Whittier (underground), Commerce/Citadel (underground), and Greenwood (aerial or at-grade). The base Alternative 3 alignment includes approximately 3.0 miles of underground, 1.5 miles of aerial, and 0.1 miles of at-grade alignment. It would terminate at Greenwood station. The base Alternative 3 also includes MSF site options in the city of Commerce or the city of Montebello which both have aerial lead tracks to the MSF. Alternative 3 has two design options with station and alignment variations: the Atlantic/Pomona Station Option and the Montebello At-Grade Option. The Atlantic/Pomona Station Option would relocate the existing Atlantic Station to an underground station between Atlantic Boulevard, Pomona Boulevard and Beverly Boulevard. The Montebello At-Grade Option is an at-grade guideway design option along Washington Boulevard between Yates Avenue and Carob Way in the city of Montebello. This design option would include an at-grade Greenwood station and the Montebello MSF At-Grade Option, which consists of at-grade lead tracks to the Montebello MSF site option if the Montebello MSF site option is selected.

3.1.5.1 Reference

Sections 3.1 through Section 3.18, Chapter 4, and Chapter 5 of the Recirculated Draft EIR.

3.1.5.2 Findings for Alternative 3

Alternative 3 has a longer alignment than Alternative 2 and shorter alignment than Alternative 1. Therefore, Alternative 3 meets Project objectives of the Build Alternatives, including enhancing regional connectivity and air quality goals, providing mobility options, improving transit access to activity centers and employment, enabling the greatest number of jurisdictions to address TOD and equity goals, and improving accessibility and connectivity to TOD communities better than Alternative 2, but not as well as Alternative 1. Operation of the base Alternative 3 would result in reduced VMT (approximately 8,000 daily trips) compared to the No Project Alternative. For comparison, the Base Alternative 1 would result in VMT reduction or 10,000 daily trips and the base Alternative 2 would result in VMT reduction of 5,000 daily trips. Alternative 3 is also compatible with the Montebello MSF, so with implementation of that MSF site option, a significant unavoidable impact on Cultural Resources would be avoided. Alternative 3, as with Alternatives 1 and 2, would include the underground construction and use of the TBM, which would result in a significant and unavoidable impact on paleontological resources.

Although the base Alternative 3 would not meet Project objectives as fully as the Alternative 1, it would result in fewer significant but mitigatable construction impacts as compared to Alternative 1 because Alternative 3 construction occurs within a smaller area. Furthermore, Alternative 3 would not cross any waterways or require the reconstruction of bridges, which would avoid significant but mitigable impacts on biological resources and hydrology and water quality. Also, Alternative 3 would not involve crossing below the I-605 overpass and construction within Caltrans ROW. This avoidance of waterways, bridges, and I-605 would reduce the need for coordinating and permitting with federal agencies, resulting in time savings, and it would also reduce funding needs. The lower costs and lower

coordination and permitting requirements would enable construction and operation of the LRT extension to occur on a shorter timeframe, thereby allowing the Project objectives to be achieved sooner than would occur under Alternative 1. Further, construction of Alternative 3 would not preclude the future build-out of the full Alternative 1 alignment when future funding sources are identified and secured.

Thus, Alternative 3 would meet Project objectives less fully than Alternative 1, but would meet them with fewer construction impacts and a faster timeline. It would also better the Project objectives better than Alternative 2, and, with implementation of the Montebello MSF, would avoid a significant unavoidable impact on cultural resources.

3.2 Design Options and MSF Options

In addition to the three Build Alternatives, the Recirculated Draft EIR considered several design options and two MSF site options.

3.2.1 Atlantic/Pomona Station Option

The Atlantic/Pomona Station Option would relocate the existing Atlantic Station to a shallow open air underground station with two side platforms and a canopy as opposed to a relocated fully underground station. The open air station design option would be located beneath the existing triangular parcel bounded by Atlantic Boulevard, Pomona Boulevard, and Beverly Boulevard. The excavation depth of the station invert would be approximately 20 to 25 feet from the existing ground elevation. This option would also impact the guideway alignment and location of the TBM extraction pit. The underground guideway would be located east of Atlantic Boulevard and require full property acquisitions at its footprint between Beverly Boulevard and 4th Street. The TBM extraction pit would be east of Atlantic Boulevard between Repetto Street and 4th Street.

3.2.1.1 Reference

Sections 3.1 through Section 3.18, Chapter 4, and Chapter 5 of the Recirculated Draft EIR.

3.2.1.2 Findings for the Atlantic/Pomona Station Option

While this configuration would necessitate cut-and-cover construction on Pomona Boulevard, it would require less excavation on Pomona Boulevard than the fully underground station as the alignment would turn at a shallower angle through the Pomona/Beverly Boulevard intersection. Similarly, there would be less decking activities in the active roadway on Atlantic Boulevard as the underground track work would be located under parcels east of Atlantic Boulevard instead of under the public right-of-way. As such, this design option would have less direct disruption to Atlantic Boulevard during construction. However, this design option would have a larger footprint of impacts because the guideway alignment and location of the TBM extraction pit would require full property acquisition along the east side of Atlantic Boulevard between Beverly Boulevard and 4th Street. Additionally, full property acquisitions would be required to accommodate the station.

While different properties would be impacted relative to noise and vibration, the number of impacted sensitive receptors would be the same as for the fully underground station and impacts would be

mitigated to less than significant. While visual impacts associated with the open air station and the fully underground station would be less than significant, the open air station would be more visibly prominent. The open air station would provide more convenient access because it would have two entrances and it would be located closer to the existing parking structure that would serve the station. Additionally, the lower depth of the station would provide easier and quicker access to transit users.

Overall, impacts would be similar for the Atlantic/Pomona Station Option as the base Alternatives but there would be less excavation and decking on active roadways (e.g., Pomona Boulevard and Atlantic Boulevard) and therefore less disruption of the circulation system during construction from temporary roadway closures, lane closures, and sidewalk closures. While more property acquisitions would be required, access to the station would be improved.

3.2.2 Montebello At-Grade Option

Under the Montebello At-Grade Option, the guideway would have an aerial configuration for approximately 0.5 miles of aerial guideway after crossing Saybrook Avenue to Yates Avenue the city of Montebello. In this design option, after crossing Saybrook Avenue, the LRT guideway would daylight from underground to an aerial configuration to avoid disrupting existing Burlington Northern Santa Fe (BNSF) Railway tracks. The aerial guideway would continue parallel to Washington Boulevard, then merge into the center median east of Garfield Avenue. At Yates Avenue, the guideway would transition from aerial to an at-grade configuration and remain at-grade until the Project terminus. This design option also includes an at-grade Greenwood station located west of Greenwood Avenue, as well as roadway reconfigurations to accommodate the at-grade segment of the alignment. The lead tracks to the Montebello MSF site option would also be at-grade.

3.2.2.1 Reference

Sections 3.1 through Section 3.18, Chapter 4, and Chapter 5 of the Recirculated Draft EIR.

3.2.2.2 Findings for the Montebello At-Grade Option

The Montebello At-Grade option would involve less aerial construction and more at-grade construction. This would result in lower construction costs. Construction of the at-grade guideway would result in slightly increased peak day air quality emissions and localized criteria pollutant emissions that would be greater than those of the base Alternatives due to a larger count of heavy-duty equipment needed. Also, GHG emissions and energy demand would be slightly greater during construction. However, impacts would be less than significant.

Compared to the aerial guideway under the base alternatives, the construction work for the at-grade portions of the alignment would have lower potential to encounter deeply buried intact archaeological, tribal, or paleontological resources because excavation would be shallower than would be required for installation of supports for the aerial structure and Greenwood station; however, excavation would still be required under the design option, and the potential to encounter intact resources would remain.

Compared to the base alternatives, the Montebello At-Grade Option would introduce new visual features at ground level instead of as an aerial structure. The at-grade configuration would be less visually prominent than the aerial structure and the at-grade segment would be less visually obtrusive relative to scenic resources, visual character, and indirect visual impacts on adjacent historic

resources. Noise levels during operations would be slightly greater near the at-grade alignment; however, there are no sensitive receptors in the vicinity of this segment and there would be no significant impacts.

Temporary lane and sidewalk closures would be needed to construct the aerial and at-grade guideway configurations. These impacts to transit, traffic, bicycle, and pedestrian circulation would be mitigated to less than significant levels with application of construction mitigation measures. Further, while operational impacts related to traffic circulation and emergency access would be less than significant, the longer at-grade alignment would result in somewhat greater impacts associated with traffic circulation due a greater number of at-grade intersection crossings. However, the need for grade separations was evaluated based on Metro's Grade Crossing Safety Policy and the proposed grade crossings that would occur under the Montebello At-Grade Option fall under the least restrictive category "At Grade Operation Should Be Feasible." Furthermore, the city of Montebello supports an at-grade configuration and at-grade Greenwood station within the city's boundaries.

While the Montebello At-Grade Option would have some greater impacts, primarily associated with traffic circulation and noise and vibration, the at-grade configuration is consistent with Metro's Grade Crossing Safety Policy, would have a lower cost, and is supported by the local jurisdiction.

3.2.3 Maintenance Storage Facility

An MSF is needed as part of the Project to provide equipment and facilities to clean, maintain and repair rail cars, vehicles, tracks, and other components of the system. The MSF would enable storage of light rail vehicles (LRVs) that are not in service. Two MSF locations were evaluated for the Project, one in the city of Commerce and one in the city of Montebello. Both locations would serve Alternative 1 and 3, but only the Commerce site would serve Alternative 2.

3.2.3.1 Commerce MSF

The Commerce MSF site option is located in the city of Commerce, west of Washington Boulevard and north of Gayhart Street. The site is approximately 24 acres and bounded by Davie Avenue to the east, Fleet Street to the north, Saybrook Avenue to the west, and an unnamed street to the south. The lead tracks to the Commerce MSF site option would be located northeast of the intersection of Gayhart Street and Washington Boulevard and would extend in an aerial configuration and then transition to at-grade within the MSF site option after crossing Davie Avenue. To construct and operate the Commerce MSF site option, Corvette Street, an undivided two-lane road, would be permanently closed between Saybrook Avenue and Davie Avenue. The Commerce MSF site option, lead tracks, and construction staging would require acquisition of properties with low-rise commercial and industrial buildings serving light industrial, wholesale, warehousing, distribution, and commercial supply businesses. The facility would accommodate storage for approximately 100 LRVs.

3.2.3.2 Reference

Sections 3.1 through Section 3.18, Chapter 4, and Chapter 5 of the Recirculated Draft EIR.

3.2.3.2.1 Findings for the Commerce MSF

The Metro Board finds that specific economic, legal, social, technological, or other considerations make infeasible the Commerce MSF. The Commerce MSF was one of two options for the MSF site, with the other being the Montebello MSF site. Construction of the Commerce MSF site option would result in significant and unavoidable impacts to cultural resources related to the removal of properties within the potential Vail Field Industrial Addition historic district. The Alignment for Alternative 1 and Alternative 3 with the Commerce MSF would also result in the acquisition and demolition of the Pacific Metals Building, which is a historical resource. Therefore, the Commerce MSF site option would result significant unavoidable impacts to cultural resources.

3.2.3.3 Montebello MSF

The Montebello MSF site option is located in the city of Montebello, north of Washington Boulevard and south of Flotilla Street between Yates Avenue and S. Vail Avenue. The site is approximately 30 acres and is bounded by S. Vail Avenue to the east, a warehouse structure along the south side of Flotilla Street to the north, Yates Avenue to the west, and a warehouse rail line to the south. The lead tracks to the MSF would be aerial under the base Build Alternatives and transition to at-grade as the track approaches the MSF site option; the lead tracks would be at-grade under the Montebello At-Grade Option and would result in the elimination of through access on Acco Street to Vail Avenue with cul-de-sacs provided on each side of the lead tracks to ensure that access to businesses in this area is maintained. The Montebello MSF site option and lead tracks would require acquisition of several properties with commercial and industrial uses. The facility would accommodate storage for approximately 120 LRVs. The guideway alignment for the MSF would be located further east than the alignment with the Commerce MSF site option and transition to the median of Washington Boulevard at Gayhart Street.

3.2.3.4 Reference

Sections 3.1 through Section 3.18, Chapter 4, and Chapter 5 of the Recirculated Draft EIR.

3.2.3.4.1 Findings for the Montebello MSF

The Montebello MSF would meet the purpose and need goals of the Project. As with Commerce, the Montebello MSF would involve acquisition of existing industrial properties. However, these properties are not historic and would not result in a significant unavoidable impact. Additionally, with the Montebello MSF, the guideway alignment would be adjusted to avoid acquisition of the Pacific Metals Building, which is a historical resource. The Montebello site would result in the closure of through access on Acco Street to Vail Avenue, however, with mitigation, access would be maintained to properties to the west of the vacated portion of Acco Street via Yates Avenue as specified by required project measures. The Montebello MSF site is also approximately six acres larger than the Commerce MSF site, which would require a larger area of demolition and construction resulting in slightly higher GHG emissions during construction, however, the larger site can store approximately 20 more vehicles than the Commerce site. Additionally, the city of Montebello has expressed support for selecting the Montebello site for the MSF.

3.3 Findings for the Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be identified among the selected alternatives. Three Build Alternatives and the No Project Alternative were evaluated in the Recirculated Draft EIR.

The No Project Alternative would have the greatest number of significant and unavoidable impacts to environmental resources as this alternative would be inconsistent and conflict with regional and local programs, plans, ordinances, and policies related to air quality, GHG, Land Use, and transportation. The No Project Alternative would also not achieve or address any of the Project objectives since it would not include a new rail service in the GSA.

All Build Alternatives, design options, and MSF site options would have significant and unavoidable impacts during construction relative to geology, seismicity, soils, and paleontological resources. While this impact would be similar for all Build Alternatives and options, the severity of impacts and applicability of mitigation measures relative to other resources areas help distinguish environmental superiority among alternatives.

Alternatives 1, 2, and 3 with the Commerce MSF site option, with or without the design option(s), would result in significant and unavoidable impacts to cultural resources related to demolition of the historic Pacific Metals Company Building and removal of properties within the potential Vail Field Industrial Addition historic district at the Commerce MSF site.

Alternatives 1 and 3 with the Montebello MSF site option, with or without the design options, would have similar findings of environmental impacts and mitigation measures. However, compared to the Alternative 3 with Montebello MSF site option, Alternative 1 with the Montebello MSF site option would require additional mitigation and would have a greater number of properties and public rights-of-way with impacts that must be mitigated due to the larger footprint of Alternative 1.

Therefore, Alternative 3 with the Montebello MSF site option, with or without the design alternatives, would be the environmentally superior alternative.

3.3.1 Reference

Section 5.7 of the Recirculated Draft EIR, Table ES-3 and Table ES-5, Executive Summary of the Recirculated Draft EIR.

3.4 Findings for Mitigations Measures

The Metro Board has considered every mitigation measure recommended in the Recirculated Draft EIR and included in the MMRP. Metro hereby binds itself to implement or, as appropriate, require implementation of these measures. The MMRP will be adopted concurrently with these Findings and will be effectuated through the process of constructing and implementing the Project.

Some comments on the Recirculated Draft EIR suggested additional mitigation measures and/or modifications to the measures recommended in the Recirculated 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 Recirculated 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. 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 Project.

4. FINDINGS ON CHANGES TO THE RECIRULATED DRAFT EIR

4.1 Changes to the Recirculated Draft EIR

4.1.1 Design Refinements

The following describes the refinements to the overall project design and performance that have occurred subsequent to publication of the Recirculated Draft EIR described in detail in **Section 1.6.3.6.** The Design Refinements which are fully evaluated in Chapter 2 of the Final EIR are not considerably different from Build Alternatives and design options analyzed in the Recirculated Draft EIR.

- Guideway Refinement – an optional refinement of the aerial and at-grade guideway configurations where the aerial tracks would transition from an aerial to an at-grade configuration further east of the location evaluated under the base Alternative 1 and 3 in Recirculated Draft EIR and further west of the location evaluated under the Montebello At-Grade Option evaluated for Alternative 1 and 3 in the Recirculated Draft EIR. The lead tracks to the MSF would be aerial as evaluated for the base Alternative 1 and 3 in the Recirculated Draft EIR.

- Crossover Refinements – four new or revised crossover locations from those evaluated in the Recirculated Draft EIR (four locations are applicable to Alternative 1 and three locations are applicable to Alternative 3).

    - Maravilla crossover (Optional for Alternative 1 and Alternative 3) – a new at-grade crossover in the existing Line E tracks on 3rd Street between Arizona Avenue and Kern Avenue, west of East L.A. Civic Center Station, located outside of the alignment but within the DSA studied in the Recirculated Draft EIR.

    - Atlantic/Whittier Station crossover (Alternative 1 and Alternative 3 component) – a new underground crossover just north of the proposed Atlantic/Whittier station that increases the size of the underground station footprint that was analyzed in the Recirculated Draft EIR.

- Greenwood crossovers (Alternative 1 and Alternative 3 component with the Montebello At-Grade Option or Guideway Refinement) – at-grade crossover west of Greenwood station and crossover east of Greenwood station that is west of the crossover location analyzed in the Recirculated Draft EIR.

- Lambert crossover (Alternative 1 component) – a new at-grade crossover and tail tracks south of the Alternative 1 terminus at Lambert station. This crossover is applicable to Alternative 1 but not applicable to the Project.

4.1.2 Corrections and Additions

In response to comments from the public and other public agencies, the Project has incorporated changes subsequent to publication of the Recirculated Draft EIR. Additional changes include updates to the regulatory setting that have occurred subsequent to the Recirculated Draft EIR. Actual changes to the text can be found in Chapter 3, Corrections and Additions, of the Final EIR. Changes in Chapter 3 are identified by text strikeout and underline. Changes to the Draft Recirculated EIR include:

- Document-wide
  - All references to the Metro L (Gold) Line are updated to Metro E Line to be consistent with a system-wide name change implemented by Metro
- Executive Summary
  - Correction to Table ES-2, Summary of Impacts by Environmental Resource, to fix a typo
  - Revisions to Table ES-3, Summary of Impact Evaluation of the Recirculated Draft EIR, to be consistent with modifications to mitigation measure titles for Biological Resources, Hazards and Hazardous Materials, and Noise and to be consistent with a modification to the Impact BIO-2 impact determination for Alternative 3 as identified in the bullets below
- Chapter 2 Project Description
  - Addition of clarifying statement regarding relocation of artwork at the existing Atlantic Station
  - Addition of a brief summary of the Design Refinements
  - Addition of a required permit to Table 2-5, Required Agency Permits
- Section 3.1 Aesthetics
  - Clarification of several existing setting descriptions
  - Replacement of the existing photograph and conceptual visual simulation of the at-grade Greenwood station consistent with current Metro design standards
- Section 3.3 Biological Resources

- Identification of the LA Metro Tree Policy to which the Project would adhere; the policy was adopted subsequent to the publication of the Recirculated Draft EIR
- Modification of several mitigation measures in response to comments by the CDFW to improve clarity and add additional specifications to protect bats, migratory birds, and nesting swallows, and to minimize introduction or migration of tree pathogens in areas with vegetation communities
- Modification of mitigation measure MM BIO-4, and associated discussion under Impact BIO-1, to clarify that the mitigation applies to tree trimming during the tree establishment maintenance period to be consistent with Metro standard procedures and to clarify that tree trimming would be required to comply with federal and state regulations protecting nesting birds
- Modification of the impact determination for Alternative 3 under Impact BIO-2 from less than significant with mitigation to less than significant based on further analysis due to the urbanized setting of Alternative 3 and the distance from rivers and spreading grounds. The modification better explains that Project and surrounding areas are built-out and that construction would occur in developed or paved areas and would not affect vegetation communities; hence, it is unlikely that construction of the Project would introduce or spread invasive plants or tree disease pathogens and the impacts would be less than significant and no mitigation would be required
- Modification of mitigation measures MM BIO-5 and MM BIO-6 to clarify that they only apply to construction where it crosses the rivers and spreading grounds where invasive species and vegetation communities occur. The possible introduction or spread of invasive plants or tree pathogens during construction from use of equipment would only be likely within these areas

- Section 3.4 Cultural Resources
  - Correction to the title of a mis-identified figure
  - Correcting an omission under Impact CUL-1 to identify that two historical resources (the South Montebello Irrigation District Building and the William and Florence Kelly House) that would have less than significant impacts under Alternative 1 would also be less than significantly impacted under Alternative 3
  - Modification of mitigation measure MM CUL-1 to clarify that the contractor is responsible for preparing a pre-construction baseline survey and building protection report, implementing building protection measures as specified in the building protection report, and conducting a post-construction survey of the Golden Gate Theater in relation to Guideway Alignment construction adjacent to the historical resource and to clarify that the Golden Gate Theater is currently a CVS store.
  - Modification of mitigation measure MM CUL-4 to clarify that the contractor is responsible for implementing protection measures for avoiding the Dal Rae Restaurant Sign

- Modification of mitigation measure MM CUL-7 to improve clarity on requirements if archaeological artifacts are discovered
- Modification of mitigation measure MM CUL-8 to improve clarity on preparing a Cultural Resources Monitoring and Mitigation Plan (CRMMP) and requirements if unknown archaeological resources are encountered
- Modification of mitigation measure MM CUL-9 to clarify that work halted if human remains are discovered may be resumed at the discretion of Metro

- Section 3.5 Energy
  - Correction to statement about existing LRT service in the GSA
- Section 3.6 Geology, Soils and Paleontological Resources
  - Modification of project measure PM GEO-1 to remove the year of the Metro Rail Design Criteria (MRDC) referenced in the measure.
  - Modification of mitigation measure MM GEO-1 to clarify that the contractor shall retain a qualified paleontologist to develop a Paleontological Resource Mitigation and Monitoring Plan (PRMMP) and that paleontological monitoring would not be required during TBM excavation because it is infeasible
  - Modification of mitigation measure MM GEO-2 to clarify that monitoring for paleontological resources and salvage of fossils shall occur in compliance with the PRMMP required by mitigation measure MM GEO-1
  - Modification of mitigation measure MM GEO-3 to clarify that the PRMMP required under mitigation measure MM GEO-1 shall specify procedures for the discovery, recovery, preparation, and analysis of significant paleontological resources encountered during construction
  - Modification of mitigation measure MM GEO-4 to clarify that curation of specimens shall occur in compliance with the PRMMP required by mitigation measure MM GEO-1
- Section 3.8 Hazards and Hazardous Materials
  - Correction of typo
  - Correction to include identification and evaluation of two additional schools located within proximity to the Project based on public comments received from LAUSD and a school opening subsequent to publication of the Recirculated Draft EIR
  - Minor revisions to project measures PM HAZ-1, PM HAZ-2, PM HAZ-3, and PM HAZ-4 for clarification and consistency with Metro standard procedures

- Modification of mitigation measure MM HAZ-1 based on public comments received from Caltrans to improve clarity and specificity regarding investigation for the presence of petroleum hydrocarbons, metals, or volatile organic compounds in soil or groundwater
- Minor clarifications and corrections to mitigation measures MM HAZ-1, MM HAZ-2, MM HAZ-3, and MM HAZ-4 to be consistent with Metro terminology and standard procedures
- Revision of mitigation measure discussion in the impacts analysis for consistency with the revisions identified above

- Section 3.9 Hydrology and Water Quality
  - Updating of the reference and discussion of the applicable Construction General Permit and NPDES MS4 Permit, which went into effect subsequent to publication of the Recirculated Draft EIR
  - Updating of and clarifying information on existing groundwater wells based on input received from Caltrans
  - Revision of project measures PM HWQ-1 and PM HWQ-2 for clarification; revision of project measure PM HWQ-2 to limit permissible erosion control materials and provide greater restrictions on drilling near or in surface waters based on public comments from CDFW
  - Revision of mitigation measure MM HWQ-2 to require a preparation of a hydrology report in conjunction with the Lake and Streambed notification for the Project in response to public comments from CDFW and to clarify that compensatory mitigation would be in compliance with applicable Federal, state, and local requirements
  - Revision of mitigation measure discussion in the impacts analysis for consistency with the revisions identified previously for MM HAZ-2 and MM HAZ-3
- Section 3.10 Land Use and Planning
  - Updated to provide additional information on relocation assistance following property acquisition
  - Clarification that properties acquired for construction activities may be available for joint development or parking facilities
- Section 3.11 Noise and Vibration
  - Revision of mitigation measure MM NOI-1 to specify the performance criteria to be established in the noise control plan and construction noise monitoring plan shall prohibit construction noise from exceeding the FTA general assessment construction noise criteria at a minimum
  - Revision of mitigation measure MM NOI-2 to clarify pile driving noise limitations

- Revision of mitigation measure MM NOI-3 in response to public comments from the Los Angeles Unified School District (LAUSD) to better identify performance criteria
- Revision of mitigation measure MM NOI-7 to explain that MM NOI-1 now clarifies that the FTA general construction noise criteria for nighttime construction work shall not be exceeded
- Revision of mitigation measure MM NOI-8 for clarification and in response to public comments from the LAUSD to specifically identify that Metro shall notify schools of construction operations and schedules
- Revision of mitigation measure MM NOI-9 to specify that tunnel construction must comply with FTA goundborne noise and vibration criteria
- Revision of mitigation measure MM NOI-10 to better address the potential noise impact associated with removal of tunnel spoils in residential areas
- Revision of mitigation measure MM NOI-12 to specify that measures to reduce operation tunnel vibration would be required where necessary to be below FTA criteria for frequent annoyance
- Revision of mitigation measure MM NOI-13 to provide additional flexibility for types of fixtures that may be installed to reduce vibration due to gaps at switches and to clarify that these methods would be required where necessary to be below FTA criteria for frequent annoyance
- Revision of mitigation measure MM NOI-14 to better clarify that Metro shall identify selected properties that may be susceptible to vibration damage and the methods of documentation
- Revision of project measure PM NOI-1 for clarification
- Revision of project measure PM NOI-2 for clarification regarding construction activities that could affect sensitive receptors
- Revision of mitigation measure and project measure discussion in impacts analysis for consistency with revisions discussed above

- Section 3.12 Population and Housing
  - Expansion of demographic information and tables notes presented in Table 3.12-4 to improve clarity
- Section 3.13 Public Services and Recreation
  - Correction to include identification and evaluation of two additional schools located within proximity to the Project based on public comments received from LAUSD and a school opening subsequent to publication of the Recirculated Draft EIR

- Revision to the description and evaluation of impacts to trails along the Rio Hondo and San Gabriel River from bike trails to multi-use trails in response to public comments from the Los Angeles Department of Parks and Recreation (DPR)
- Clarification that development of a Traffic Management Plan will include coordination with affected jurisdictions along the route, including DPR in response to public comments from DPR
- Revision to the description of the Metro Ambassador Program to reflect changes that took place subsequent to the publication of the Recirculated Draft EIR in response to comments from the city of Pico Rivera
- Revision of project measure PM PSR-1 for clarification and consistency with Metro standard procedures

- Section 3.14 Transportation and Traffic
  - Addition of multi-use trails to the description of facilities and evaluation of construction safety in response to public comments from DPR
  - Minor revisions to project measures PM TRA-1, PM TRA-2, and PM TRA-3 for clarification on required codes and standards; minor revision to PM TRA-2 for clarity and consistency with Metro standard procedures
  - Revision to project measure PM TRA-2 to specify that cooperation shall occur with the county throughout the construction process and that safety for multi-use trail users shall be maintained during construction in response to public comments from DPR; to clarify that the referenced "plan" refers to the Traffic Management Plan required by MM TRA-1; and to clarify that lane and/or road closures shall be scheduled to in coordination with authorities having jurisdiction
  - Revision to project measure PM TRA-3 and PM TRA-4 to remove references to the Commerce MSF site option and Montebello MSF At-Grade Option, which were studied in the Recirculated Draft EIR but not advanced to the Final EIR
  - Revision of project measure discussion in impacts analysis to incorporate revisions discussed above
  - to mitigation measure MM TRA-1 in response to public comments from DRP and LAUSD and to improve clarity and feasibility with the following modifications and additions:
    - Clarification that Metro's contractor shall prepare the Traffic Management Plan
    - Clarification that scheduling construction related travel during off-peak travel applies to deliveries and would not apply to hauling and worker trips. Haul trips continue to be subject to other mitigation and project measures including being restricted to designated haul routes and local permitting requirements and an updated specification to avoid published school pedestrian routes to the greatest extent possible

- Addition that safe and convenient pedestrian routes to school would be maintained
- Specification that traffic control officers shall be provided as required by the Traffic Management Plan and Worksite Traffic Control Plans if delays are related to construction activities
- Specification that requirements for pedestrian safety measures also apply to multi-use trails
- Addition that regular communication with school administrators about activities/detours that could affect pedestrian routes to schools shall be maintained
- Addition that construction flaggers will be used if construction ingress or egress is within 200 feet of a school's student entrance during school hours
- Addition that Metro's construction outreach efforts will include providing advanced information to school district administrators if bus routes or bus stops would be affected by construction activities
- Addition a provision requiring maintenance of access to schools and businesses during operating hours throughout the construction period

- Section 3.15 Tribal Cultural Resources
  - Revision to mitigation measure MM TCR-3 for clarification regarding preparation of a CRMMP and to define acronyms; revision of mitigation measure discussion in impacts analysis for consistency with these edits
- Section 3.16 Utilities
  - Revision of impacts analysis to clarify that utility relocation work will generally occur within the affected ROW and on adjacent and nearby streets
- Section 3.17 Growth-Inducing
  - Revision of impacts analysis to clarify that there may be an opportunity for joint-use development at station areas and acquired properties
- Section 3.18 Cumulative Impacts
  - Update to include an additional project considered in the evaluation of the Project's cumulative impacts
  - Revision to clarify that the potentially significant impact from spread of invasive species and tree pathogens only applies to the rivers and spreading grounds (Alternative 1)
  - Revision to correct mitigation measure numbering for Geology, Seismicity, Soils, and Paleontological Resources mitigation
- Chapter 9 References

- Update to include several documents that were published after publication of the Recirculated Draft EIR

- Appendix B – Q
  - Impacts Reports for each environmental topic that are provided as appendices to the Recirculated Draft EIR have been updated to correspond with the updates of the EIR Chapters and Sections listed above

- Volume 2 Advanced Conceptual Design
  - Various drawings included in Volume 2 of the Recirculated Draft EIR have been updated and replaced based on advancements in the Project design and engineering

4.2 Findings Regarding Changes to the Recirculated Draft EIR

Although Chapter 2 of the Final EIR includes minor design refinements and Chapter 3 of the Final EIR includes minor amounts of new information and clarifications generated in comments received on the Recirculated Draft EIR and responses to those comments, and from engineering advancements, the information is not significant new information as defined by Section 15088.5 of the CEQA Guidelines. Therefore, recirculation of the Recirculated Draft EIR is not required. On the basis of the review and consideration of the Final EIR, and based on substantial evidence in light of the whole record, Metro finds:

1. Design refinements, factual corrections, and minor changes have been set forth as clarifications and modifications to the Recirculated Draft EIR;

2. The design refinements, factual corrections, and minor changes to the Recirculated Draft EIR are not substantial changes in the Recirculated Draft EIR that would deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the proposed project, a feasible way to mitigate or avoid such an effect, or a feasible project alternative;

3. The design refinements, factual corrections, and minor changes to the Recirculated Draft EIR will not result in new significant environmental effects or substantially increase the severity of the previously identified significant effects disclosed in the Recirculated Draft EIR;

4. The design refinements, factual corrections, and minor changes in the Recirculated Draft EIR do not involve mitigation measures or alternatives which are considerably different from those analyzed in the Recirculated Draft EIR that would substantially reduce one or more significant effect on the environment; and

5. The design refinements, factual corrections, and minor changes to the Recirculated Draft EIR do not render the Recirculated Draft EIR so fundamentally inadequate and conclusory in nature that meaningful public review and comment would be precluded.

Thus, none of the conditions set forth in CEQA requiring recirculation of a Recirculated Draft EIR have been met. Incorporation of the design refinements, factual corrections, and minor changes to the Recirculated Draft EIR into the Final EIR does not require the EIR to be recirculated for public and agency comment.

5. 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.

5.1 Significant and Unavoidable Impacts

The Project would result in the following significant and unavoidable impacts:

Geology, Seismicity, Soils, and Paleontological Resources (Impact GEO-5: Paleontological Resources). The Project is located in an area where paleontological resources are likely to be present and loss of these resources would occur during construction from soil disturbance, including excavation, tunneling, and construction of underground stations. Monitoring for resources can be implemented during excavation where the excavation site is reasonably accessible and visible, where soil spoils can be reasonably observed, and where construction methods do not completely destroy any potential specimen. However, monitoring is not feasible during tunnel boring activities because the TBM operates by grinding material as it moves forward, making it impossible to preserve fossils or bones. The tunnel boring for the project would occur in sediments with a high sensitivity for paleontological resources, and thus, construction and cumulative impacts resulting from using the TBM would result in significant direct impacts on paleontological resources.

5.2 Overriding Considerations

Metro finds that notwithstanding the significant and unavoidable impacts identified above, there are specific overriding economic, legal, social, technological, and other reasons for approving the Project and finding the above adverse effect to be considered acceptable. These reasons are summarized below:

1. **Increased Transportation Mobility**

The Project will enhance access and mobility to communities located further east and provide connectivity to other destinations along Metro's regional transit system. Further, the Project will reduce travel times and the need for transfers within the system.

2. Economic Growth Consistent with General Plans and the Sustainable Communities Strategy

The Project, by serving concentrated areas of employment, activity centers and residential communities, will support transit-oriented community goals and address the needs of transit-dependent populations. The Project will provide new and faster transit options which will help lead to equitable development and in-fill growth opportunities throughout eastern Los Angeles County. The Project will provide incentives for development near rail stations in accordance with local land use plans and the 2020-2045 Regional RTP/SCS adopted by SCAG and increase property values for businesses and residences located near rail stations. Providing improved transit access in the East Los Angeles will also facilitate travel during non-commute periods that is economically important (e.g., travel for dining, shopping, and entertainment).

3. Social Benefits

The Project will serve the communities within East Los Angeles County by improving regional mobility, reducing regional vehicle miles travelled, providing a regional rail transit link between East Los Angeles County, downtown Los Angeles, and Santa Monica, providing an alternative to the private automobile. The Project will improve access to employment centers and community facilities such as universities and hospitals.

4. Land Use Benefits

The Project is included in the 2020-2045 RTP/SCS and is consistent with sustainable growth goals to prioritize development of existing urban areas over urban sprawl and provide efficient and plentiful public transit to create increased mobility, active lifestyles, increased economic opportunity, and an overall higher quality of life.

5. Climate Change and Air Quality Benefits

The Project will reduce GHG and other air pollutants by diverting vehicle trips from local freeways and arterial streets and reducing VMT. The Project will support the accomplishment of state GHG emissions-reduction policies, as set forth in AB 32 and Senate Bill (SB) 32, which set GHG emission reduction goals for 1990 levels by 2020, and 40 percent below 1990 levels by 2030 and were incorporated into the November 2017 California Air Resources Board Climate Change Scoping Plan: The strategy for achieving California's 2030 greenhouse gas target; CEQA Guidelines section 15064.4, which has been amended to require lead agencies to analyze the GHG emissions of proposed projects and focus on the project's foreseeable incremental contribution of the project's emissions to the effects of climate change; Executive Order B-55-18 (Brown, 2018) which sets a goal of statewide carbon neutrality by 2045; and Executive Order S-3-05 (Schwarzenegger, 2005), which sets a target for emissions reductions to 80 percent below 1990 levels by 2050.

Based on the foregoing findings, Metro finds that the economic, social, and environmental benefits of the Project outweigh the significant and unavoidable impact identified in the Final EIR and the record of proceedings. In making this finding, Metro has balanced the benefits of the Project against the unavoidable impacts and is willing to accept the adverse impact. Metro finds that each one of the foregoing benefits, independent of the other benefits, would warrant approval of the Project notwithstanding the unavoidable significant impacts.

5.3 Conclusion

Based on the foregoing findings and the information contained in the record, it is hereby determined that:

a) All significant effects on the environment due to approval of the Project have been eliminated or substantially lessened where feasible, and

b) Any remaining significant effects of the Project on the environment found to be unavoidable are acceptable due to the factors described in the Statement of Overriding Considerations above.