ATTACHMENT B

Findings of Fact

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

North Hollywood to Pasadena Bus Rapid Transit Corridor Project

February 2022

Metro

In Association with:

Kimley-Horn
Terry A. Hayes Associates Inc.
Connetics Transportation Group
GPA Consulting
Paleo Solutions, Inc.
Impact Sciences, Inc.
PARIKH Consultants, Inc.
Resource Systems Group
The Robert Group
Translink Consulting, LLC

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ABBREVIATIONS/ACRONYMS

AQMP ..... Air Quality Management Plan
BRT ..... Bus Rapid Transit
CEQA ..... California Environmental Quality Act
CO ..... Carbon Monoxide
EIR..... Environmental Impact Report
FTA..... Federal Transit Administration
GHG ..... Greenhouse Gases
LADOT ..... Los Angeles Department of Transportation
L_{eq} ..... Equivalent Noise Level
Metro ..... Los Angeles County Metropolitan Transportation Authority
MMRP..... Mitigation Monitoring and Reporting Program
NPDES ..... National Pollutant Discharge Elimination System
PPV ..... Peak Particle Velocity
PRC..... Public Resources Code
RTP/SCS ..... Regional Transportation Plan/Sustainable Communities Strategy
SCAQMD..... South Coast Air Quality Management District
SCAB..... South Coast Air Basin
SCAG ..... Southern California Association of Governments
SFV..... San Fernando Valley
SR..... State Route
SUSMP..... Standard Urban Stormwater Mitigation Plan
SWPPP..... Stormwater Pollution Prevention Plan
VdB..... Vibration Decibels
TAC ..... Toxic Air Contaminants
VMT..... Vehicle Miles Traveled
WEAP ..... Worker Environmental Awareness Protection

1. INTRODUCTION

The Los Angeles County Metropolitan Transportation Authority (Metro) followed a prescribed process, in accordance with California Environmental Quality Act (CEQA) and the CEQA regulations, to identify the issues to be analyzed, including the solicitation of input from the public, stakeholders, elected officials, and other affected parties. Implementation of the North Hollywood to Pasadena Bus Rapid Transit (BRT) Project (Proposed Project) would not result in significant unavoidable impacts with the incorporation of mitigation measures as part of the Proposed Project's approval. In accordance with CEQA, Metro, in adopting these Findings of Fact, also adopts a Mitigation Monitoring and Reporting Program (MMRP). Metro finds that the MMRP, which is included in Chapter 5 of the Final Environmental Impact Report (EIR) and is provided as a part of these findings as Attachment B to the March Metro Board Report, meets the requirements of Public Resources Code (PRC) Section 21081.6 by providing for the implementation and monitoring of measures to mitigate potentially significant effects of the Proposed Project.

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

1) Has been completed in compliance with the CEQA;

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

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

2. ORGANIZATION

The Findings of Fact and Statement is comprised of the following sections after the Introduction:

Section 3.	A brief description of the Proposed Project and its objectives
Section 4.	Statutory requirements of the findings and a record of proceedings
Section 5.	Significant impacts of the Proposed Project that cannot be mitigated to a less-than-significant level even with the identification and incorporation of all feasible mitigation measures
Section 6.	Potentially significant impacts of the Proposed Project that can be mitigated to a less-than-significant level
Section 7.	Environmental impacts that are less than significant
Section 8.	Environmental resources to which the Proposed Project would have no impact
Section 9.	Potential cumulative impacts
Section 10.	Alternatives analyzed in the evaluation of the Proposed Project and findings on mitigation measures

3. PROJECT DESCRIPTION AND OBJECTIVES

The Proposed Project would provide improved and reliable transit service to meet the mobility needs of residents, employees, and visitors who travel within the corridor. In addition to advancing the goals of Metro's Vision 2028 Strategic Plan, objectives of the Proposed Project include:

- Advance a premium transit service that is more competitive with auto travel
- Improve accessibility for disadvantaged communities
- Improve transit access to major activity and employment centers
- Enhance connectivity to Metro and other regional transit services
- Provide improved passenger comfort and convenience
- Support community plans and transit-oriented community goals

The Proposed Project is a BRT line that would extend approximately 19 miles from North Hollywood to the City of Pasadena. From west to east, the Proposed Project would travel through and serve the North Hollywood community of the City of Los Angeles, the City of Burbank, the City of Glendale, the Eagle Rock community of the City of Los Angeles, and the City of Pasadena. BRT is intended to move large numbers of people quickly and efficiently to their destinations. BRT service is comparable to light rail, but on rubber tires and at a lower cost.

To achieve the envisioned quick and efficient service, the BRT is proposed to operate in dedicated bus lanes through a majority of the route with portions of the route operating on freeways and in mixed flow. The configuration of dedicated bus lanes could be curb-running, side-running alongside existing parking and/or bicycle facilities, and/or center/median-running in the center of the roadway or alongside existing roadway medians. The configuration of each project segment is described as follows:

- **Segment A (North Hollywood)**: From the western terminus at the North Hollywood Metro Station, the BRT would operate along Chandler Boulevard – in a side-running bus lane in the eastbound direction and in mixed-flow traffic going westbound – before transitioning to a center-running configuration along Vineland Avenue and Lankershim Boulevard.
- **Segment B (North Hollywood to Burbank)**: The BRT would operate in mixed flow along the State Route (SR)-134 freeway.
- **Segment C (Burbank)**: The BRT would generally operate in mixed-flow traffic between the SR-134 freeway and Olive Avenue before transitioning to a curb-running configuration along Olive Avenue approaching Alameda Avenue. Curb-running bus lanes would be provided by removing some on-street parking along Riverside Drive east of Kenwood Street and along Olive Avenue approaching Alameda Avenue. The route turns from Olive Avenue to Alameda Avenue and proceeds to Buena Vista Street along Alameda Avenue generally in mixed-flow operations to access a station near Naomi Street, with dedicated curb-running bus lanes in both directions within the block of the proposed station at Naomi Street. The route then returns to Olive Avenue via Buena Vista Street partially operating in mixed-flow traffic, with a dedicated curb-running bus lane in the southbound direction approaching Alameda Avenue

and a dedicated curb-running bus lane in the northbound direction approaching Olive Avenue. Between Buena Vista Street and Lake Street, Olive Avenue would be reconfigured to provide side-running dedicated bus lanes (accomplished by conversion of the outside travel lanes). Mixed-flow BRT operations would occur at constrained locations including across the Olive Avenue bridge. Within Downtown Burbank, the BRT would operate in curb-running bus lanes between 1st Street and Glenoaks Boulevard.

- **Segment D (Burbank/Glendale)**: The Proposed Project would operate along Glenoaks Boulevard in mixed-flow traffic between Olive Avenue and Providencia Avenue and then transition to a median-running bus lanes configuration to Central Avenue.
- **Segment E (Glendale)**: The Proposed Project would operate in mixed-flow traffic along Central Avenue through the SR-134 interchange area, then operate in a side-running bus lanes configuration along Central Avenue, and then turn down Broadway where the Project would continue primarily in a side-running bus lanes configuration.
- **Segment F (Eagle Rock)**: From Broadway, the Proposed Project would turn onto Colorado Boulevard. Side-running bus lanes would be provided between Broadway and Ellenwood Drive. East of El Rio Avenue, the Proposed Project would operate in a center-running configuration in one of two design options between Eagle Rock Boulevard and the SR-134 on-ramp achieved by reducing the existing median and street parking or converting a travel lane in each direction to provide dedicated BRT lanes.
- **Segment G (Eagle Rock to Pasadena)**: The Proposed Project would operate in mixed-flow traffic along the SR-134 freeway and exit at Fair Oaks Avenue before traveling to Colorado Boulevard via Walnut Street and Raymond Avenue also in mixed-flow traffic.
- **Segment H (Pasadena)**: The Proposed Project would operate in mixed-flow traffic along Colorado Boulevard to the Project's eastern terminus at Pasadena City College on Hill Avenue.

The Proposed Project includes 22 stations. The typical station footprint would be approximately 100 feet long and 10 feet wide; however, station loading zones as short as 70 feet in length may be required due to site constraints. The BRT service would be provided on 40-foot zero-emission electric buses[1] with the capacity to serve up to 75 passengers. A maximum of 16 buses are anticipated to be in service along the route during peak operations. A typical 40-foot bus seats approximately 40 passengers and can carry up to 35 additional standees in the aisle circulation space, although this maximum capacity lowers the passengers' comfort and perception of quality of service and is not recommended for standard operations.

[1] As noted in the Draft and Final EIR, when operations commence in 2024, it is possible that the fleet would operate compressed natural gas (CNG) buses in its service until ZEV buses become available. The employment of CNG buses would be temporary and would not represent long-term operational conditions.

The Proposed Project would provide BRT service from 4:00 a.m. to 1:00 a.m. or 21 hours per day Sunday through Thursday, and longer service hours (4:00 a.m. to 3:00 a.m.) would be provided on Fridays and Saturdays. The proposed service span is consistent with the Metro B Line (Red). The BRT would operate with 10-minute frequency throughout most of the day on weekdays tapering to 15 to 20 minutes frequency during the evenings, and with 15-minute frequency during most of the day on weekends tapering to 30 minutes in the evenings. The Proposed Project is more fully described in Chapter 2.0, Project Description, of the Final EIR.

4. STATUTORY REQUIREMENTS

CEQA (PRC Section 21081), and particularly 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 a certified EIR identifies one or more significant environmental effects of the Proposed Project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the Proposed Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. [CEQA Finding 1]
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. [CEQA Finding 2]
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR. [CEQA Finding 3]

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

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

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

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

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

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to avoid or mitigate significant environmental impacts that would otherwise occur with implementation of the Proposed Project.[2]

For those significant impacts that cannot be mitigated to less-than-significant levels, the lead agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the Proposed Project outweigh the significant impacts on the environment.[3] CEQA Guidelines Section 15093(a) states that, "If the specific economic, legal, social, technological, or other benefits of a Proposed Project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" If the adverse environmental effects are considered acceptable the lead agency is required to prepare a Statement of Overriding Considerations. Here, for the reasons presented in the Final EIR, and based on the administrative record as a whole, the Metro Board finds that the Project would not result in any significant and unavoidable impacts. Therefore, a Statement of Overriding Considerations is not necessary for the Proposed Project.

4.1 RECORD OF PROCEEDINGS

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

- Notice of Preparation and other public notices issued by Metro in conjunction with the Proposed Project;
- The Draft EIR dated October 2020, including all associated appendices and documents that were incorporated by reference;
- All testimony, documentary evidence, and all correspondence submitted in response to the Proposed Project during the scoping meetings or by agencies or members of the public during the public comment period on the Draft EIR, and responses to those comments (Chapter 4 Responses to Comments of the Final EIR);
- The Final EIR dated February 2022, 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 Proposed Project, and all documents cited or referred to therein;

[2] CEQA Guidelines Section 15091 (a) and (b).
[3] Public Resources Code Section 21081 (b).

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

5. ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT WITH MITIGATION

Metro finds that, based upon substantial evidence in the record, none of the impacts associated with the Proposed Project would be significant or have the potential to remain significant after the implementation of Project mitigation measures.

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

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

6.1 TRANSPORTATION

As discussed in Section 3.1 of the EIR, the Proposed Project would result in a potentially significant transportation impact with respect to the following significance thresholds:

- Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (Impact 3.1-1); and
- Result in inadequate emergency access (Impact 3.1-4 (construction only)).

Impacts. *Impact 3.1-1:* As discussed more fully in Section 3.1 of the EIR, the Proposed Project would result in construction effects like those experienced for a typical roadway project. These construction effects could include inconveniences associated with temporary disruptions to existing travel patterns and temporary access limitations. Construction activities would result in significant impacts due to the potential need for temporary closures of roadway lanes, sidewalks, and bicycle lanes; the traffic generated by construction workers and truck haul trips;

and the temporary relocation of existing bus stops. Such closures would be temporary, and the degree of interruption would depend on factors including the size of the construction site and duration of each construction phase. To minimize this construction transportation impact to a less-than-significant level, Mitigation Measures **TRA-1**, **TRA-2**, **TRA-3**, and **TRA-4**, set forth below, would be implemented.

Operational activities would primarily enhance bicycle facilities by providing bypass lanes around BRT stations and by allowing bicycles to access dedicated bus lanes. However, there are design elements that require mitigation measures to ensure public safety. For example, along Colorado Boulevard in Eagle Rock (Segment F), the existing Class II bicycle lanes would be shifted to the curb and a continuous bikeway would be delineated with green pavement markings; on-street parking, where present, would be located between the bicycle lane and the adjacent mixed-flow travel lane or bus lane. The bike lanes would be routed behind the loading zones at the Eagle Rock Plaza Station and at local bus stops. To minimize this operational transportation impact to a less-than-significant level, Mitigation Measure **TRA-5**, set forth below, would be implemented.

Impact 3.1-4: Lane closures, traffic detours, and designated truck routes associated with construction could temporarily result in decreased access and delayed response times for emergency services. To minimize this construction transportation impact to a less-than-significant level, Mitigation Measure **TRA-6**, set forth below, would be implemented.

Reference. Section 3.1, Transportation, of the Draft EIR, pages 3.1-24 through 3.1-30. Chapter 3, Corrections and Additions, of the Final EIR, page 3-13.

Mitigation Measures

TRA-1: Prior to the initiation of localized construction activities, a Traffic Management Plan compliant with the provisions of the current California Manual on Uniform Traffic Control Devices, the California Traffic Control Handbook and local ordinances, as applicable, shall be developed by Metro and the construction contractor in coordination with the City of Los Angeles, City of Burbank, City of Glendale, and City of Pasadena. Metro shall develop detours as appropriate and communicate any changes to bus service to local transit agencies in advance. Stops shall be relocated in a manner which is least disruptive to transit. If bus stops need to be relocated, warning signs shall be posted in advance of closure along with alternative stop notifications and information regarding the duration of the closure.

TRA-2: Prior to the initiation of localized construction activities, a Traffic Management Plan and/or Construction Management Plan compliant with the provisions of the current California Manual on Uniform Traffic Control Devices, the California Traffic Control Handbook and local ordinances, as applicable, shall be developed by Metro and the construction contractor in coordination with the City of Los Angeles, City of Burbank, City of Glendale, and City of Pasadena. The Traffic and/or Construction Management Plan shall include provisions such as: approval of work hours and lane closures, designation of construction lay-down zones, provisions to maintain roadway access to adjoining land uses, use of

warning signs, temporary traffic control devices and/or flagging to manage traffic conflicts, and designation of detour routes where appropriate.

TRA-3: Prior to the initiation of localized construction activities, a Traffic Management Plan and/or Construction Management Plan compliant with the provisions of the current California Manual on Uniform Traffic Control Devices, the California Traffic Control Handbook and local ordinances, as applicable, shall be developed by Metro and the construction contractor, in coordination with affected jurisdictions. The plan shall include provisions for wayfinding signage, lighting, and access to pedestrian safety amenities (such as handrails, fences and alternative walkways). Metro shall also work with local municipalities and public works departments to confirm that only one side of the street would be closed at a time. If crosswalks are temporarily closed, pedestrians shall be directed to use nearby pedestrian facilities. Where construction encroaches on sidewalks, walkways and crosswalks, special pedestrian safety measures shall be used such as detour routes and temporary pedestrian shelters. Access to businesses and residences shall be maintained throughout the construction period. These mitigation measures shall be documented in a Traffic Management Plan and/or Construction Management Plan.

TRA-4: Prior to the initiation of localized construction activities, a Traffic Management Plan and/or Construction Management Plan compliant with the provisions of the current California Manual on Uniform Traffic Control Devices, the California Traffic Control Handbook and local ordinances, as applicable, shall be developed by Metro and the construction contractor, in coordination with the affected jurisdictions. The plan shall identify on-street bicycle detour routes and signage. Metro shall also work with local municipalities and public works departments to accommodate bicycle circulation during construction. Bicycle access to businesses and residences shall be maintained throughout the construction period. These mitigation measures shall be documented in a Traffic Management Plan and/or Construction Management Plan.

TRA-5: Prior to completion of Final Design, Metro shall convene a design working group with the Los Angeles Department of Transportation (LADOT) to resolve potential bicycle conflicts and identify network enhancements that integrate bicycle and BRT facilities, consistent with Policy 2.6 and Policy 2.9 of the Mobility Plan 2035. The design working group shall include representatives from the LADOT Active Transportation Division, the Los Angeles Bureau of Engineering, and a representative of the Los Angeles County Bicycle Coalition. Coordination shall be provided with LADOT and the Active Transportation Division during the preliminary engineering design development phase. In addition, Metro shall coordinate with the Cities of Burbank, Glendale, and Pasadena to resolve potential bicycle conflicts and identify network enhancements that integrate bicycle and BRT facilities.

TRA-6: The construction contractor shall provide early notification of traffic disruption to emergency service providers. Work plans and traffic control measures shall be coordinated with emergency responders to prevent impacts to emergency response times. A Traffic Management Plan compliant with the provisions of the current California Manual on Uniform Traffic Control Devices, the California Traffic Control

Handbook and local ordinances, as applicable, shall be developed and implemented to minimize impacts on emergency access.

Findings. Each of the potentially significant transportation impacts (Impacts 3.1-1 and 3.1-4) would be mitigated through the development of Traffic Management Plans and requiring coordination with affected jurisdictions. Metro finds that, through implementation of Mitigation Measures **TRA-1** through **TRA-6**, these impacts related to transportation would be reduced to a less-than-significant level. Thus, with respect to Impacts 3.1-1 and 3.1-4 identified in the EIR, Metro adopts CEQA Finding 1, as set forth in Section 4 above and in Section 15091(a) of the CEQA Guidelines.

6.2 AESTHETICS

As discussed in Section 3.2 of the EIR, the Proposed Project would create a potentially significant impact related to aesthetics with respect to the following significance threshold:

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (Impact 3.2-2 (operations only)).

Impacts. *Impact 3.2-2:* As discussed more fully in Section 3.2.4 of the EIR, the Proposed Project would result in the removal of potentially historic streetlights considered important visual resources, three along Central Avenue and three along Broadway in Glendale. In addition, the Proposed Project would impact several existing medians along the Proposed Project route that are valued by local communities for aesthetics.

Reference. Section 3.2, Aesthetics, of the Draft EIR, pages 3.1-14 through 3.1-17, and Section 3.5, Cultural Resources, of the Draft EIR, pages 3.5-13 through 3.5-19.

Mitigation Measures

VIS-1: Plant material removed from center medians and sidewalks shall be replaced within the existing street/curb right-of-way based on the following requirements:

- Tree replacement shall be completed in accordance with permitting and regulatory requirements associated with each affected jurisdiction's Bureau of Street Services and located within the street right-of-way along station approaches or within the sidewalk.
- Plant groundcover using similar replacement species or to the satisfaction of the affected jurisdiction's Bureau of Street Services.
- A Landscape Replacement Study shall be prepared by a licensed landscape architect during final design. The study shall identify the location, species, and landscape design elements for all replacement landscaping associated with the Proposed Project and subject to local jurisdiction review.

VIS-2: Replacement median, barriers, or other divider shall be enhanced with patterns or decorative features in accordance with the local jurisdiction's streetscape design guidelines and approved by local jurisdiction Street Services bureau or similar entity.

CUL-1: Project design related to potentially historic streetlights and station platforms located immediately adjacent (i.e., on or directly in front of) known or potential historical resources identified in the Historical Resources Project Area shall be reviewed by a qualified architectural historian (individual who meets the Secretary of the Interior's Professional Qualification Standards in Appendix A of 36 Code of Federal Regulations Part 61) to determine consistency with the rehabilitation treatment under the Secretary of the Interior's Standards for the Treatment of Historic Properties and confirm the Proposed Project will not cause a substantial adverse change in the significance of a historical resource. The results of this review shall be provided to Metro in a memorandum prepared by the qualified architectural historian conducting the review. This review shall be completed prior to the preparation of final construction documents.

Finding. The potential operational impacts to scenic resources (Impact 3.2-2) would be mitigated by ensuring that medians and landscaping removed as part of the Proposed Project would be replaced according to the local jurisdiction's guidelines and ordinances and requiring a qualified architectural historian to determine consistency with the rehabilitation treatment under the Secretary of the Interior's Standards for the Treatment of Historic Properties. For the reasons stated above and as set forth in the EIR, Metro finds that, through implementation of Mitigation Measures **VIS-1**, **VIS-2**, and **CUL-1**, this impact related to aesthetics would be reduced to a less-than-significant level. Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a) of the CEQA Guidelines.

6.3 BIOLOGICAL RESOURCES

As discussed in Section 3.4 of the EIR, the Proposed Project would result in a potentially significant impact related to biological resources with respect to the following significance thresholds:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (Impact 3.4-1 (construction only)); and
- 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 3.4-4 (construction only)).

Impacts. *Impact 3.4-1:* As discussed more fully in Section 3.4.4 of the EIR, the Proposed Project has the potential to impact 13 special-status species through vegetation removal and construction activities. To minimize this impact to a less-than-significant level, Mitigation Measure **BIO-1**, set forth below, would be implemented.

Impact 3.4-4: As discussed more fully in Section 3.4.4 of the EIR, tree removal could interfere with bird nesting and bat roosting. To minimize this impact to a less-than-significant level, Mitigation Measure **BIO-1**, set forth below, would be implemented.

Reference. Section 3.4, Biological Resources, of the Draft EIR, pages 3.4-7 through 3.4-10.

Mitigation Measures

BIO-1: To mitigate for construction impacts on special-status bird species, the construction contractor shall implement the following measures:

- Construction during bird nesting season (typically February 1 to September 1) would be avoided to the extent feasible. Feasible means capable of being accomplished in a successful manner taking into consideration costs and schedule.
- If construction is required during the nesting season, vegetation removal would be conducted outside of the nesting season (typically February 1 to September 1), wherever feasible. Feasible means capable of being accomplished in a successful manner taking into consideration costs and schedule.
- If construction, trimming, or removal of vegetation and trees are scheduled to begin during nesting bird season, nesting bird surveys would be completed by a qualified biologist no more than 72 hours prior to construction, or as determined by the qualified biologist, to determine if nesting birds or active nests are present within the construction area. Surveys would be conducted within 150 feet for songbirds and 500 feet for raptors, or as otherwise determined by the qualified biologist. Surveys would be repeated if construction, trimming, or removal of vegetation and trees are suspended for five days or more.
- If nesting birds/raptors are found within 500 feet of the construction area, appropriate buffers consisting of orange flagging/fencing or similar (typically 150 feet for songbirds, and 500 feet for raptors, or as directed by a qualified biologist) would be installed and maintained until nesting activity has ended, as determined in coordination with the qualified biologist and regulatory agencies, as appropriate.

To mitigate construction impacts on special-status bat species, the construction contractor shall implement the following measures:

- Where feasible, tree removal would be conducted in October, which is outside of the maternal and non-active seasons for bats.
- During the summer months (June to August) in the year prior to construction, a thorough bat roosting habitat assessment would be conducted of all trees and structures within 100 feet of the construction area. Visual and acoustic surveys would be conducted for at least two nights during appropriate weather conditions to assess the presence of roosting bats. If presence is detected, a count and species analysis would be completed to help assess the type of colony and usage.
- No fewer than 30 days prior to construction, and during the non-breeding and active season (typically October), bats would be safely evicted from any roosts to be directly impacted by the Project under the direction of a qualified biologist. Once bats have been safely evicted, exclusionary devices designed by the

qualified biologist would be installed to prevent bats from returning and roosting in these areas prior to removal. Roosts not directly impacted by the Project would be left undisturbed.

- No fewer than two weeks prior to construction, all excluded areas would be surveyed to determine whether exclusion measures were successful and to identify any outstanding concerns. Exclusionary measures would be monitored throughout construction to ensure they are functioning correctly and would be removed following construction.
- If the presence or absence of bats cannot be confirmed in potential roosting habitat, a qualified biologist would be onsite during removal or disturbance of this area. If the biologist determines that bats are being disturbed during this work, work would be suspended until bats have left the vicinity on their own or can be safely excluded under direction of the biologist. Work would resume only once all bats have left the site and/or approval is given by a qualified biologist.
- In the event that a maternal colony of bats is found, no work would be conducted within 100 feet of the maternal roosting site until the maternal season is finished or the bats have left the site, or as otherwise directed by a qualified biologist. The site would be designated as a sensitive area and protected as such until the bats have left the site. No activities would be authorized adjacent to the roosting site. Combustion equipment, such as generators, pumps, and vehicles, would not to be parked nor operated under or adjacent to the roosting site. Construction personnel would not be authorized to enter areas beneath the colony, especially during the evening exodus (typically between 15 minutes prior to sunset and one hour following sunset).

Findings. The potentially significant biological impacts (Impacts 3.4-1 and 3.4-2) would be mitigated by requiring qualified biologists to conduct site surveys prior to construction, restrict vegetation removal activities to outside of bird nesting and bat roosting seasons, and establish appropriate buffers around nesting birds/raptors. For the reasons stated above and as set forth in the EIR, Metro finds that, through implementation of Mitigation Measure **BIO-1,** Impacts 3.4-1 and 3.4-2 related to biological resources would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a) of the CEQA Guidelines.

6.4 CULTURAL RESOURCES

As discussed in Section 3.5 of the EIR, the Proposed Project would result in a potentially significant impact related to cultural resources with respect to the following significance thresholds:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 (Impact 3.5-1); and
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 (Impact 3.5-2 (construction only)).

Impacts. *Impact 3.5-1:* As discussed more fully in Section 3.5.4 of the EIR, construction of the proposed station platforms in the City of Glendale has the potential to result in the removal or relocation of potentially significant historic streetlights currently within the existing sidewalk (three on Central Avenue and three on Broadway). Regarding project operations, project components, such as stations, electric charging infrastructure, and signs, have the potential to visually affect historic resources. To reduce this impact (Impact 3.5-1) to a less-than significant level, Mitigation Measures **CUL-1**, set forth below, would be implemented.

Impact 3.5-2: As discussed more fully in Section 3.5.4 of the EIR, no archeological resources have been identified in the Project Area, and resources that may have existed have likely been displaced or destroyed as a result of previous development activities. Excavation activities upon previously disturbed soils would be limited to 2 to 3 feet below ground surface. Vertical element relocation activities, such as trees, signs, parking meters and streetlights, may extend to a depth of 12 feet below ground surface, below the currently disturbed soils. It is therefore possible that previously undiscovered and undocumented archaeological resources could be encountered during construction activities. To reduce this impact to a less-than-significant level, Mitigation Measure **CUL-2**, set forth below, would be implemented.

Reference. Section 3.5, Cultural Resources, of the Draft EIR, pages 3.5-13 through 3.5-19.

Mitigation Measures

CUL-1: A qualified architectural historian (individual who meets the Secretary of the Interior's Professional Qualification Standards in Appendix A of 36 Code of Federal Regulations Part 61) shall review all project design documents related to historic streetlights and station platforms located immediately adjacent (i.e., on or directly in front of) known or potential historical resources identified in the Historical Resources Project Area to determine consistency with the rehabilitation treatment under the Secretary of the Interior's Standards for the Treatment of Historic Properties to confirm the Proposed Project will not cause a substantial adverse change in the significance of a historical resource. The results of this review shall be provided to Metro in a memorandum prepared by the qualified architectural historian conducting the review, and Metro shall incorporate any design recommendations that would address potential substantial adverse changes in the significance of a historical resource into project design documents prior to the preparation of final construction documents.

CUL-2: A Qualified Archaeologist, meeting the Secretary of the Interior's Standards for professional archaeology, shall be retained for the Project and will remain on call during all ground-disturbing activities. The Qualified Archaeologist shall ensure that Worker Environmental Awareness Protection (WEAP) training, presented by a Qualified Archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the Proposed Project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures in the event of an unanticipated cultural resource. The WEAP training can be in the form of a video or PowerPoint

presentation. Printed literature (handouts) can accompany the training and can also be given to new workers and contractors to avoid the necessity of continuous training over the course of the Proposed Project.

If an inadvertent discovery of archaeological materials is made during construction activities, ground disturbances in the area of the find shall be halted and the Qualified Archaeologist shall be notified regarding the discovery. If prehistoric or potential tribal cultural resources are identified, the interested Native American participant(s) shall be notified.

The archaeologist, in consultation with Native American participant(s) and the lead agency, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is an historical resource, a unique archaeological resource, a unique paleontological resource, or tribal cultural resources). If avoidance is not feasible, a Qualified Archaeologist, in consultation with the lead agency, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources would consist of, but would not be limited to, in-field documentation, archival research, subsurface testing, and excavation. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories, libraries, and interested professionals.

Findings. The potential impacts (Impacts 3.5-1 and 3.5-2) would be mitigated by requiring a qualified architectural historian and a qualified archeologist to oversee construction activities. Metro finds that, through implementation of Mitigation Measures **CUL-1** through **CUL-2**, Impacts 3.5-1 and 3.5-2 related to cultural resources would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a) of the CEQA Guidelines.

6.5 GEOLOGY AND SOILS

As discussed in Section 3.7 of the EIR, the Proposed Project would create a potentially significant impact related to geology and soils with respect to the following significance thresholds:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: strong seismic ground shaking; seismic-related ground failure, including liquefaction; and/or landslides (Impact 3.7-3 (operations only).
- 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 (operations only).

Impacts. *Impact 3.7-1:* As discussed more fully in Section 3.7.4 of the EIR, the Proposed Project is located within the seismically active Southern California region. Hence, seismic activity as a result of earthquakes generated from nearby faults is anticipated. Seismic activity during operation activities could result in significant impacts related to seismic ground shaking, liquefaction, and landslides. Liquefaction may only occur at isolated areas within the Eagle Rock

Valley along the Project Route. To minimize this impact to a less-than-significant level, Mitigation Measure **GEO-1**, set forth below, would be implemented.

Impact 3.7-3: As discussed more fully in Section 3.7.4 of the EIR, seismically-induced settlements (dry settlements) are a potential hazard due to mostly granular soil deposits, deep groundwater, and expected high peak ground acceleration in the Project Area. The eastern Glendale, Eagle Rock, and western Pasadena portions of the Project Area are the most susceptible to shallow landslides and debris flows. To minimize this impact to a less-than-significant level, Mitigation Measure **GEO-1**, set forth below, would be implemented.

Reference. Section 3.7, Geology and Soils, of the Draft EIR, page 3.7-12 through 3.7-16.

Mitigation Measures

GEO-1: The Proposed Project shall be designed based on the latest versions of local and State building codes and regulations in order to construct seismically-resistant structures that help counteract the adverse effects of ground shaking. During final design, site-specific geotechnical investigations shall be performed at the sites where structures are proposed within liquefaction-prone designated areas. The investigations shall include exploratory soil borings with groundwater measurements. The exploratory soil borings shall be advanced, as a minimum, to the depths required by local and State jurisdictions to conduct liquefaction analyses. Similarly, the investigations shall include earthquake-induced settlement analyses of the dry substrata (i.e., above the groundwater table). The investigations shall also include seismic risk solutions to be incorporated into final design (e.g., deep foundations, ground improvement, remove and replace, among others) for those areas where liquefaction potential may be experienced. The investigation shall include stability analyses of slopes located within earthquake-induced landslides areas and provide appropriate slope stabilization measures (e.g., retaining walls, slopes with shotcrete faces, slopes re-grading, among others). The geotechnical investigations and design solutions shall follow the "Guidelines for Evaluating and Mitigating Seismic Hazards in California" Special Publication 117A of the California Geologic Service, as well as Metro's Design Criteria and the latest federal and State seismic and environmental requirements.

Findings. The potential impacts would be mitigated by ensuring that impacts related to strong seismic ground shaking, liquefaction, and landslides by designing the Project elements according to State and local building codes. For the reasons stated above and as set forth in the EIR, Metro finds that, through implementation of Mitigation Measure **GEO-1**, this impact related to geology and soils would be reduced to a less-than-significant level. Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a) of the CEQA Guidelines.

6.6 NOISE

As discussed in Section 3.9 of the EIR, the Proposed Project could result in a significant impact related to noise with respect to the following significance thresholds:

- The 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 3.9-1 (construction only)); and
- Result in generation of excessive groundborne vibration or groundborne noise levels (Impact 3.9-2 (construction only)).

Impacts. *Impact 3.9-1:* As discussed more fully in Section 3.9.4 of the EIR, construction activities would require the use of heavy equipment, pneumatic tools, generators, concrete pumps, and similar equipment. Construction activities are likely to generate noise impacts that could increase ambient noise levels that would exceed local significance thresholds within one or more jurisdictions along the BRT alignment in terms of equivalent noise levels (L_{eq}). Nighttime activities are not anticipated to be needed to construct the Proposed Project. However, at this stage of the planning process and without a construction contractor, it cannot be confirmed if nighttime construction would be necessary for specialized construction tasks. Nighttime activities could result in a significant impact should those activities involve heavy equipment or pneumatic tools. To minimize this impact to a less-than-significant level, Mitigation Measure **NOI-1**, set forth below, would be implemented.

Impact 3.9-2: As discussed more fully in Section 3.9.4 of the EIR, the use of vibratory rollers or more impactful equipment could exceed the Federal Transit Administration (FTA) recommended vibration limits for building damage in peak particle velocity (PPV) and general annoyance in terms of vibration decibels (VdB). To minimize this impact to a less-than-significant level, Mitigation Measures **NOI-2** and **NOI-3**, set forth below, would be implemented.

Reference. Section 3.9, Noise and Vibration, of the Draft EIR, page 3.9-15 through 3.9-31.

Mitigation Measures

NOI-1: Where construction cannot be performed in accordance with the FTA 1-hour L_{eq} construction noise standards, elevates existing ambient noise levels by 5 dBA L_{eq} or more at a noise sensitive use, or exceeds other applicable noise thresholds of significance, the construction contractor shall develop a Noise Control Plan demonstrating how noise criteria would be achieved during construction. The Noise Control Plan shall be designed to follow Metro requirements, include construction noise control measures, measurements of existing noise, a list of the major pieces of construction equipment that would be used, and predictions of the noise levels at the closest noise-sensitive receivers (residences, hotels, schools, churches, temples, and similar facilities). The Noise Control Plan shall be approved by Metro prior to initiating localized construction activities.

The Noise Control Plan shall require weekly noise monitoring at land uses adjacent to construction activities. Noise reducing measures shall be required should the following performance standards be exceeded within the following jurisdictions:

- City of Los Angeles: Construction noise levels that exceed the existing ambient exterior noise level at a noise sensitive use by 10 dBA L_{eq} within one hour for construction lasting more than one day, 5 dBA L_{eq} for construction lasting more than 10 days in a three-month period, and any exceedance of 5 dBA during the hours of 9:00 p.m. to 7:00 a.m. Monday through Friday and between 6:00 p.m. to 8:00 a.m. on Saturday or any time Sunday.
- City of Burbank: Construction noise levels that exceed the existing ambient exterior noise level between 7:00 a.m. and 7:00 p.m. at a noise sensitive use by 5 dBA L_{eq} for construction lasting more than 10 days in a three-month period. Construction noise levels of any duration that exceed existing ambient exterior noise levels by 5 dBA L_{eq} at a noise sensitive use between the hours of 7:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 5:00 p.m. on Saturday, or at any time on Sunday.
- City of Glendale: Construction noise levels that exceed the existing ambient exterior noise level between 7:00 a.m. and 7:00 p.m. at a noise sensitive use by 5 dBA L_{eq} for construction lasting more than 10 days in a three-month period. Construction noise levels of any duration that exceed existing ambient exterior noise levels by 5 dBA L_{eq} at a noise sensitive use between 7:00 p.m. and 7:00 a.m. Monday through Saturday or at any time on Sunday.
- City of Pasadena: Construction noise levels that exceed 85 dBA L_{eq} at 100 feet of distance or any duration of noise levels that exceeds existing ambient exterior noise levels by 5 dBA L_{eq} at a noise sensitive use between 7:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 5:00 p.m. on Saturday, or at any time on Sunday.

Noise-reducing methods that may be implemented include:

- Where construction occurs near noise sensitive land uses, specialty equipment with enclosed engines, acoustically attenuating shields, and/or high-performance mufflers shall be used.
- Limit unnecessary idling of equipment.
- Install temporary noise barriers or noise-control curtains, where feasible and desirable.
- Reroute construction-related truck traffic away from local residential streets and/or sensitive receivers.
- Use electric instead of diesel-powered equipment and hydraulic instead of pneumatic tools where feasible.

NOI-2: Where equipment such as a vibratory roller that produces high levels of vibration is used within 25 feet of buildings or typical equipment such as large bulldozer is used within 15 feet of buildings, or where the 0.2 PPV inches per second vibration damage risk threshold would be exceeded, the construction contractor shall develop and implement a Vibration Control Plan to avoid exceeding FTA thresholds for significant vibration impacts at land uses. The Construction Vibration Control Plan shall include mitigation measures to minimize vibration impacts during construction. Recommended construction vibration mitigation measures shall, at a minimum, include:

- The contractor shall minimize the use of tracked vehicles.
- The contractor shall avoid vibratory compaction within 25 feet of buildings.
- The contractor shall monitor vibration levels near sensitive receivers during activities that generate high vibration levels to ensure thresholds are not exceeded.

NOI-3: Where equipment such as a vibratory roller that produces high levels of vibration is used within 105 feet of residences or institutional daytime land uses or equipment such as large bulldozers are used within 65 feet of such uses, the 75 VdB vibration threshold for human annoyance could be exceeded at residences or the 75 VdB threshold at institutional uses. The Construction Vibration Control Plan shall include mitigation measures to minimize vibration impacts during construction. Recommended construction vibration mitigation measures that shall be considered and implemented where feasible include:

- The contractor shall minimize the use of tracked vehicles and vibratory equipment.
- The contractor shall avoid vibratory compaction.
- The contractor shall monitor vibration levels near sensitive receivers during activities that generate high vibration levels to ensure thresholds are not exceeded.

Findings. Impact 3.9-1 would be mitigated by ensuring that the construction contractor develops a Noise Control Plan designed to follow Metro requirements, including construction noise control measures, measurements of existing noise, a list of the major pieces of construction equipment that would be used, and predictions of the noise levels at the closest noise-sensitive receivers (residences, hotels, schools, churches, temples, and similar facilities). Impact 3.9-2 would be mitigated by requiring the construction contractor to develop a Construction Vibration Control Plan to mitigate vibrational impacts. For the reasons stated above and as set forth in the EIR, Metro finds that, through implementation of Mitigation Measure **NOI-1**, **NOI-2**, and **NOI-3**, Impacts 3.9-1 and 3.9-2 related to construction noise and vibration would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a) of the CEQA Guidelines.

6.7 TRIBAL CULTURAL RESOURCES

As discussed in Section 3.10 of the EIR, the Proposed Project would result in a potentially significant impact related to tribal cultural resources based on the following significance thresholds:

- Cause a substantial adverse change in the significance of a tribal cultural resource, listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) (Impact 3.10-1 (construction only)); and
- Cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe (Impact 3.10-2 (construction only)).

Impacts. *Impact 3.10-1:* As discussed more fully in Section 3.10.4 of the EIR, the Kizh Nation, Fernandeno Tataviam, and Gabrieleno/Tongva San Gabriel Band of Mission Indians tribal representatives identified areas of high sensitivity within the Project Area; however, no known tribal cultural resources have been identified through the Assembly Bill 52 consultation process. There is, however, the possibility that ground-disturbing activities could impact previously undiscovered buried tribal cultural resources of historical significance. To minimize this potential impact to a less-than-significant level, Mitigation Measure **CUL-2**, set forth below, would be implemented.

Impact 3.10-2: As discussed more fully in Section 3.10.4 of the EIR, construction activities of the Project would be limited to minor roadway construction or widening, excavation limited to two to three feet below ground surface, station platform placement, and the relocation of vertical elements. The Project Area is highly developed and the possibility of uncovering previously undiscovered and undocumented tribal cultural resources is low. Nonetheless, it is possible that construction activities would reveal a new resource. To minimize this potential impact to a less-than-significant level, Mitigation Measure **CUL-2**, set forth below, would be implemented.

Reference. Section 3.8, Tribal Cultural Resources, of the Draft EIR, pages 3.10-13 through 3.10-19.

Mitigation Measures

CUL-2: A Qualified Archeologist, meeting the Secretary of the Interior's Standards for professional archaeology, shall be retained for the Project and will remain on call during all ground-disturbing activities. The Qualified Archaeologist shall ensure that Worker Environmental Awareness Protection (WEAP) training, presented by a Qualified Archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the Proposed Project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural

resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures in the event of an unanticipated cultural resource. The WEAP training can be in the form of a video or PowerPoint presentation. Printed literature (handouts) can accompany the training and can also be given to new workers and contractors to avoid the necessity of continuous training over the course of the Proposed Project.

If an inadvertent discovery of archaeological materials is made during construction activities, ground disturbances in the area of the find shall be halted and the Qualified Archaeologist shall be notified regarding the discovery. If prehistoric or potential tribal cultural resources are identified, the interested Native American participant(s) shall be notified.

The archaeologist, in consultation with Native American participant(s) and the lead agency, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is an historical resource, a unique archaeological resource, a unique paleontological resource, or tribal cultural resources). If avoidance is not feasible, a Qualified Archaeologist, in consultation with the lead agency, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources would consist of, but would not be limited to, in-field documentation, archival research, subsurface testing, and excavation. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories, libraries, and interested professionals.

Finding. The potential impacts (Impacts 3.10-1 and 3.10-2) would be mitigated by ensuring that any tribal cultural resources discovered during construction of the Proposed Project would be properly assessed and preserved. For the reasons stated above and as set forth in the EIR, Metro finds that, through implementation of Mitigation Measure **CUL-2**, Impacts 3.10-1 and 3.10-2 related to tribal cultural resources would be reduced to a less-than-significant level. For each of these impacts, Metro adopts CEQA Finding 1 as identified in Section 4 above and in Section 15091(a) of the CEQA Guidelines.

7. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

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

7.1 TRANSPORTATION

As discussed in Section 3.1 of the EIR, the Proposed Project would result in a less-than-significant impact related to transportation with respect to the following significance thresholds:

- Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) (Impact 3.1-2 (construction only));
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Impact 3.1-3 (operations only)); and
- Result in inadequate emergency access (Impact 3.1-4 (operations only)).

Impacts. *Impact 3.1-2:* As discussed more fully in Section 3.1.3.3 of the EIR, the additional construction-related vehicle miles traveled (VMT) would be typical of a roadway construction project consisting of approximately 25 trips per day with an assumed average trip length of approximately 15 miles. Consistent with CEQA Guidelines Section 15064.3, once constructed, the Proposed Project is anticipated to reduce VMT regionally.

Impact 3.1-3: As discussed more fully in Section 3.1.3.3 of the EIR, the Proposed Project would be designed per applicable State, Metro, and city design criteria and standards. For segments with median-running bus lanes, stations are usually provided on islands at intersections and are accessible from the signalized crosswalk. The safety measures include signal-protected pedestrian movements, channelization, barriers to protect and route pedestrians, Americans with Disabilities Act-compliant curb ramps, along with warning signs to provide for convenient and safe access to boarding areas. Further, the BRT service would include queue jumps at selected locations at which a traffic signal with special bus indications would display a bus-only phase, which would allow buses to enter an intersection before a green indication is given to other traffic in order to allow the bus to maneuver across mixed-flow lanes ahead of conflicting traffic. Therefore, during operations, the Proposed Project would result in a less-than-significant impact related to increased hazards due to geometric design features or incompatible uses.

Impact 3.1-4: As discussed more fully in Section 3.1.3.3 of the EIR, during operations, emergency vehicles would be permitted to use the dedicated bus lanes, like mixed-flow vehicular travel lanes. Since the dedicated bus lanes would be free of most vehicular traffic and emergency vehicles would be permitted to use the dedicated bus lanes, emergency response time would be no worse than under current conditions and would likely be improved. In addition, Metro would consult the local emergency response departments to confirm emergency access is adequately maintained at locations with restricted left turns. For example, the Proposed Project would provide a westbound left-turn bay on Colorado Boulevard at Maywood Avenue immediately to the west of the Los Angeles Fire Department Station 42, which would facilitate response in either direction from the fire station driveway. Metro will evaluate options to facilitate fire department access and circulation during subsequent design phases. While center-running and median-running BRT configurations would result in some left-turn restrictions, left-turn opportunities throughout the Project Area would be provided at major signalized intersections. In addition, Proposed Project facilities would be designed in accordance with Metro Design Criteria including Fire/Life Safety Design Criteria.

Reference. Section 3.1, Transportation, of the Draft EIR, pages 3.1-28 through 3.1-30.

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

Finding. For the reasons stated above and as set forth in the EIR, Metro finds that these impacts related to transportation would be less than significant.

7.2 AESTHETICS

The Proposed Project would result in a significant impact related to aesthetics with respect to the following significance thresholds:

- Have a substantial adverse effect on a scenic vista (Impact 3.2-1);
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (Impact 3.2-2 (construction only));
- Conflict with applicable zoning and other regulations governing scenic quality (Impact 3.2-3 (operations only)).

Impacts. *Impact 3.2-1:* There are no formal scenic vistas in the Project Area and views of surrounding landscapes and topography are available but generally low quality. Construction activities would introduce heavy equipment to the area (i.e., bulldozers, scrapers, and trucks), security fencing, barricade materials, stockpiled building materials, and safety and directional signage into the Project Area, which would result in some obstructed views of visual elements in the foreground such as buildings and landscape elements; however, views of surrounding mountains and landscapes would remain unaffected from view corridors of public streets, sidewalks, and properties.

Regarding operations, the addition of buses in any of the proposed configurations would not be expected to substantially affect existing views in the Project Area. Stations would include canopies, potential monument signs, and other vertical features which could limit views for viewers directly adjacent to or underneath the canopies; however, views in the Project Area as a whole would not be substantially affected by the Proposed Project.

Impact 3.2-2: Construction activities are not anticipated to result in damage to any scenic resources. Certain construction activities associated with modifications to the medians along Glenoaks Boulevard and Colorado Boulevard as well as placing stations along sidewalks may require trimming of existing street trees and temporary removal of streetscape features (i.e., decorative street lights and paving), but such resources would be replaced or maintained where feasible.

Impact 3.2-3: While each jurisdiction in the Project Area has a zoning ordinance that regulates the scenic quality of development projects, the zoning ordinances do not directly regulate the design of transportation infrastructure elements including bus facilities such as stations. The Proposed Project elements would primarily be located within the street right-of-way such that no

changes to existing land uses are anticipated. As such, the Proposed Project would be consistent with zoning requirements. The Proposed Project would follow Metro's Transit Service Policies & Standards, Public Art Policy, Systemwide Station Design Standards, and Standard/Directive Drawings which provide a consistent, streamlined systemwide design approach for Metro stations that include sustainable design features and sustainable landscaping. In locations where there are specific design guidelines or ordinances, including the North Hollywood Redevelopment Project Commercial Core Urban Design Guidelines, Glendale Downtown Specific Plan, Glendale Town Center Specific Plan, Glendale Comprehensive Design Guidelines, Pasadena Citywide Design Principles and Design Guidelines, or Pasadena Central District Specific Plan, the Project would comply with applicable design requirements including undergoing mandated design review. The aesthetic design of stations and related transit facilities will promote a sense of place and minimize adverse visual impacts on surrounding neighborhoods. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

Reference. Section 3.2, Aesthetics, of the Draft EIR, pages 3.2-13 through 3.2-25.

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

Finding. For the reasons stated above and as set forth in the EIR, Metro finds that these impacts related to aesthetics would be less than significant.

7.3 AIR QUALITY

As discussed in Section 3.3 of the EIR, the Proposed Project would result in a less-than-significant impact related to air quality with respect to the following significance thresholds:

- Conflict with or obstruct implementation of the applicable air quality plan (Impact 3.3-1);
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (Impact 3.3-2);
- Expose sensitive receptors to substantial pollutant concentrations (Impact 3.3-3); and
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (Impact 3.3-4).

Impacts.

Impact 3.3-1: As discussed in Section 3.3.4 of the EIR, the Proposed Project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. In order to reduce such emissions, the SCAQMD drafted the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving the California Ambient Air Quality Standards and National Ambient Air Quality Standards. The Proposed Project would not exceed the short-term

construction standards or long-term operational standards and, as a result, would not violate any air quality standards. In addition, the 2016 AQMP contains air pollutant reduction strategies based on the Southern California Association of Governments (SCAG) latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. Implementation of the Proposed Project would not introduce new growth in population, housing, or employment to Los Angeles County or the greater SCAG region. Therefore, the Proposed Project would not induce growth exceeding the assumptions within the AQMP. The Proposed Project would expand the transit network within the County of Los Angeles and would encourage mode shift from single-passenger vehicles to transit. As a result, the Proposed Project is consistent with the 2016 AQMP as well as the goals set out in the Cities of Los Angeles, Burbank, Glendale, and Pasadena's General Plans.

Impact 3.3-2: As discussed in Section 3.3.4 of the EIR, the SCAB region is in nonattainment for ozone and particulate matter 2.5 microns or less in diameter. Construction activities would result in the short-term generation of criteria pollutant emissions. Emissions would include (1) fugitive dust generated from curb/pavement demolition, site work, and other construction activities; (2) hydrocarbon emissions related to the application of architectural coatings; (3) exhaust emissions from powered construction equipment; and (4) motor vehicle emissions associated with debris hauling trips, material delivery trips, and worker trips. Detailed emissions modeling demonstrated that the Proposed Project construction emissions would not exceed the SCAQMD regional construction thresholds for any criteria air pollutant. Regarding operations, the Proposed Project would result in indirect criteria air pollutant emissions from, brake and tire wear from transit buses, and the reduction of motor vehicle use throughout the surrounding region as motorists shift from vehicles to public transit. Detailed emissions modeling demonstrated that the Proposed Project would reduce regional operational emissions due to the reduction in emissions associated with passenger vehicles.

Impact 3.3-3: As discussed in Section 3.3.4 of the EIR, construction and operational activities were assessed for exposure to toxic air contaminants (TACs) and localized criteria pollutants. Regarding construction TACs, the greatest potential for TAC emissions would be related to diesel particulate matter emissions associated with heavy equipment operations. Construction activities associated with the Proposed Project would be sporadic and short-term in nature. Metro has committed to using equipment outfitted with engines meeting Tier 4 emissions standards that would substantially reduce diesel PM emissions and associated exposures. Construction would travel along the route and would not be in any one location over those 30-months. The assessment of cancer risk is typically based on a 70-year exposure period; however, the Proposed Project's construction is anticipated to have a duration of approximately 30 months. Because exposure to diesel exhaust would be well below the 70-year exposure period, construction activities would not result in an elevated cancer risk to exposed persons. The SCAQMD has developed a set of mass emissions rate look-up tables than can be used to evaluate localized impacts that may result from criteria air pollutants. Detailed emissions modeling demonstrated that the Proposed Project construction emissions would not exceed the SCAQMD localized construction thresholds for any criteria air pollutants.

Operational activities would not include localized emissions. The only potential source of localized emissions associated with bus operations would be pollutants from bus idling. The Proposed Project would include zero emission vehicles and there would be no exhaust emissions. There is no potential for localized emissions to exceed the SCAQMD significance thresholds.

The SCAQMD recommends the evaluation of potential carbon monoxide (CO) hot spots that may occur from traffic congestion resulting from implementation of projects with substantial trip generation or modifications to roadway networks. Based on ambient air monitoring data collected by SCAQMD, SCAB has continually met State and federal ambient air quality standards for CO since 2003. As such, SCAB was reclassified to attainment/maintenance status from serious nonattainment, effective June 11, 2007. While the Final 2016 AQMP is the most recent AQMP, no additional regional or hot-spot CO modeling has been conducted to demonstrate attainment of the 8-hour average CO standard since the analysis provided in the 2003 AQMP. Maximum intersection approach volumes under the Proposed Project would be over 40 percent less than the maximum intersection approach volume used for the 2003 AQMP attainment demonstration. Volumes would be less in the Existing plus Project condition without the ambient growth attributed to future years. Furthermore, the background concentration of 8-hour CO has significantly reduced as compared to the 2003 AQMP. As such, there would be no potential for CO emissions at any intersection location to result in an exceedance of either the CAAQS or NAAQS for CO.

The Proposed Project includes a lane reduction on Olive Avenue in Burbank between Buena Vista Street and Lake Street and may include a lane reduction on Colorado Boulevard in Eagle Rock. The lane reductions would slow existing traffic speeds and increase congestion. This would result in increased localized pollutant concentrations along these roadway segments. For example, according to the California Air Resources Board EMFAC model, a passenger vehicle traveling at 5 miles per hour generates 1.85 grams of CO per mile while a passenger vehicle traveling at 35 miles per hour generates 1.06 grams of CO per mile. However, as discussed above, maximum volumes would be over 40 percent less than the maximum volume used for the 2003 AQMP attainment demonstration. In addition, transportation modeling completed for the Proposed Project found that traffic volumes on Colorado Boulevard would be reduced by approximately 20 percent as drivers search for other routes in the area. Similar reductions would occur on Olive Avenue. Given the relatively low traffic volumes and the low emission rates associated with the existing vehicle fleet, there is no potential for the lane reduction to result in significant localized pollutant concentrations.

Operation of the proposed BRT service would utilize zero-emission buses that do not combust fuel that could create TAC emissions from diesel or other fuels. Further, the enhancement of public transit service over this approximately 19-mile corridor would generally reduce use of passenger vehicles and trucks for travel, as people shift increasingly to public transit. As such, the long-term operation of BRT service would reduce TAC emissions from motor vehicles.

Impact 3.3-4: As discussed in Section 3.3.4 of the EIR, construction activities associated with the Proposed Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and

cease upon project completion. In addition, the Proposed Project would be required to comply with the California Code of Regulations, Title 13, Section 2449(d)(3), which applies to off-road diesel vehicles with a break horsepower (bhp) greater than 50, and Section 2485, which minimizes the idling time of on-road diesel-fueled construction equipment with a gross vehicle weight rating greater than 10,000 pounds either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. The Proposed Project would also be required to comply with the SCAQMD Rule 1113 – Architectural Coating, which would minimize odor impacts from reactive organic gases emissions during architectural coating. Regarding operations, the SCAQMD identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Stations would include waste bins that would be maintained on a regular basis and would not typically generate significant odors.

Reference. Section 3.3, Air Quality, of the Draft EIR, pages 3.3-17 through 3.3-26. Chapter 3 of the Final EIR, page 3-22.

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

Finding. For the reasons stated above and as set forth in the EIR, Metro finds that impacts related to air quality would be less than significant.

7.4 BIOLOGICAL RESOURCES

As discussed in Section 3.4 of the EIR, the Proposed Project would result in a less-than-significant impact related to biological resources with respect to the following significance threshold:

- Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (Impact 3.4-5 (construction only)).

Impact. As discussed in Section 3.4.4 of the EIR, there is potential for the Proposed Project to remove trees or vegetation to accommodate station platforms within the Cities of Los Angeles, Glendale, Burbank, and Pasadena. Each of these jurisdictions have ordinances governing the removal and replacement of trees as a result of construction activities, which would reduce the potential for significant impacts.

Reference. Section 3.4, Biological Resources, of the Draft EIR, page 3.4-12.

Mitigation Measures. This impact would be less than significant and does not require mitigation measures.

Finding. For the reasons stated above, Metro finds that this impact related to biological resources would be less than significant.

7.5 CULTURAL RESOURCES

As discussed in Section 3.5 of the EIR, the Proposed Project would result in a less-than-significant impact related to cultural resources with respect to the following significance threshold:

- Disturb any human remains, including those interred outside of dedicated cemeteries (Impact 3.5-3 (construction only)).

Impact. As discussed in Section 3.5.4 of the EIR, record searches indicated that no human remains have been recorded within the Project Area or within a 0.25-mile radius. The Project Area is highly developed and the likelihood of uncovering previously undiscovered human remains is low. Nevertheless, the results of previous studies do not preclude the existence of buried remains which may be encountered during the construction phase. Therefore, Metro would follow the procedures and protocols set forth in CEQA Guidelines Section 15064.5(e)(1); Health and Safety Code Section 7050.5, subdivision (c); and PRC Section 5097.98 (as amended by Assembly Bill 2641) if human remains are encountered during construction.

Reference. Section 3.5, Cultural Resources, of the Draft EIR, page 3.5-19.

Mitigation Measures. This impact would be less than significant with the incorporation of applicable laws and regulations and does not require mitigation measures.

Finding. For the reasons stated above, Metro finds that this impact related to cultural resources would be less than significant.

7.6 ENERGY

As discussed in Section 3.6.1 of the EIR, the Proposed Project would result in a less-than-significant impact related to energy with respect to the following significance thresholds:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation (Impact 3.6-1); and
- Conflict with or obstruct a State or local plan for renewable energy or energy efficiency (Impact 3.6-2 (construction only)).

Impacts. *Impact 3.6-1:* As discussed in Section 3.6.4 of the EIR, construction activities would use energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment, construction worker travel, delivery truck travel, and haul truck travel. Construction would result in a one-time expenditure of approximately 1,095,225 gallons of diesel fuel and 14,331 gallons of gasoline. Average annual fuel consumption would be approximately 438,090 gallons of diesel fuel and 5,733 gallons of gasoline. Construction would not place an undue burden on available petroleum-based fuel resources. The one-time expenditure of gasoline would be offset by operations within one year and the one-time expenditure of diesel fuel would be offset within five years of operation through transportation mode shift. The temporary additional transportation fuels consumption does not require

additional capacity provided at the local or regional level. In addition, lighting equipment required for construction staging would consume a marginal level of electricity relative to regional consumption levels. Construction of the Proposed Project would be required to divert at least 50 percent of the construction generated debris to recycling facilities. By 2024, the net annual energy effects of Proposed Project operations would be an equivalent reduction of approximately 114,229,190 mega joules. The Proposed Project would result in the reduction of regional on-road vehicle miles traveled and annual transportation fuels consumption. Therefore, construction and operations of the Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Impact 3.6-2: As discussed in Section 3.6.4 of the EIR, implementation of Metro's Green Construction Policy, the CALGreen Code, and Title 24 would ensure that construction would be consistent with State and local energy plans and policies to reduce energy consumption. The Green Construction Policy commits Metro contractors to using less-polluting construction equipment and vehicles and implementing best practices to reduce harmful diesel emissions. Best practices include Tier 4 emission standards for off-road diesel-powered construction equipment with greater than 50 horsepower and restricting idling to a maximum of five minutes. The CALGreen Code requires reduction, disposal, and recycling of at least 50 percent of nonhazardous construction materials and requires demolition debris to be recycled and/or salvaged. This would ensure that the Proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Reference. Section 3.6, Energy, of the Draft EIR, pages, 3.6-17 through 3.6-24.

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

Finding. For the reasons stated above and as set forth in the EIR, Metro finds that impacts related to Energy would be less than significant.

7.7 GEOLOGY AND SOILS

As discussed in Section 3.7 of the EIR, the Proposed Project would result in a less-than-significant impact related to geology and soils with respect to the following significance thresholds:

- 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 lateral spreading, liquefaction, or collapsible soils (Impact 3.7-3 (operations only)); and
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (Impact 3.7-6 (construction only)).

Impacts. *Impact 3.7-3:* As discussed in Section 3.7.4 of the EIR, during operations, the Proposed Project is not expected to experience lateral spreading since liquefaction is not likely to occur in the Project Area. Furthermore, the liquefied area must be relatively near a free face, a vertical or sloping face such as a road cut or stream/riverbank, which is unlikely to occur (or

may be limited to very specific areas) in the Project Area. The potential for liquefaction is related to water-saturated soils. Deep groundwater is expected in the Project Area with isolated cases of shallower groundwater depth within the Eagle Rock Valley. Shallow groundwater is not expected in the Project Area. The Proposed Project would be located on exiting roadways that do not have a history of collapsible soils. The relatively deep groundwater conditions substantially reduce the potential for collapse.

Impact 3.7-6: As discussed in Section 3.7.4 of the EIR, the Project Area is underlain with sediments of high paleontological potential Pleistocene-age older sedimentary deposits or Miocene-age Topanga Formation. While the Project Area is heavily developed and construction activities would only require shallow excavation, it is possible that previously undiscovered paleontological resources or unique geological features would be uncovered during construction in the upper three feet of the site. In the unanticipated event that fossil resources are discovered during construction, they should be protected from further excavation, destruction, or removal as required by the California PRC.

Reference. Section 3.7, Geology and Soils, of the Draft EIR, page 3.7-15 through 3.7-18.

Mitigation Measures. These impacts would be less than significant with the incorporation of applicable laws and regulations and do not require mitigation measures.

Finding. For the reasons stated above, Metro finds that the above-referenced impacts related to geology and soils would be less than significant.

7.8 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 4.1.2 of the EIR, the Proposed Project would result in a less-than-significant impact related to hazards and hazardous materials with respect to the following significance thresholds:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (Hazards Impact “a”);
- 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 (Hazards Impact “b”);
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (Hazards Impact “c”);
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (Hazards Impact “d”);
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment (Hazards Impact “f”); and
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (Hazards Impact “g”).

Impacts. *Hazards Impact a:* As discussed in Section 4.1.2 of the EIR, construction activities would involve the temporary use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids for on-site construction equipment. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. For example, the SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. The SCAQMD also regulates volatile organic compound emissions from contaminated soil through Rule 1166. Regarding operations, vehicle maintenance activities would require the use of detergents and cleansers. The potential for exposure to these hazards and hazardous materials would be limited to the existing Metro facilities. Metro facilities are staffed with personnel trained in hazardous materials emergencies. Metro staff is available 24-hours a day through the Quality Assurance Department to respond to hazardous materials releases, and Metro sites frequently undergo emergency response drills. There would be no hazardous emissions associated with operations of the Proposed Project.

Hazards Impact b: As discussed in Section 4.1.2 of the EIR, Construction activities would not involve the use of significantly hazardous materials. Excavation work associated with utility relocations and station platform construction would be unlikely to result in the accidental release of methane, oil, gas, or other subsurface hazardous materials. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. Construction vehicles would use diesel fuel, although the accidental release of construction fuel would not significantly endanger the public or the environment through reasonably foreseeable upset or accident conditions.

Regarding operations, Project activities would not involve the use of significantly hazardous materials. Vehicle maintenance activities would require the use of detergents and cleansers. These are not hazardous materials that could endanger the public or the environment through reasonably foreseeable upset and accident conditions.

Hazards Impact c: As discussed in Section 4.1.2 of the EIR, there are many schools located within one-quarter mile of the approximately 19-mile alignment. Construction activities would involve minimal ground disturbance and excavation. Construction would be unlikely to result in the accidental release of methane, oil, gas, or other subsurface hazardous materials. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. For example, the SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. The SCAQMD also regulates volatile organic compound emissions from contaminated soil through Rule 1166. During operations, the potential for exposure to hazards and hazardous materials would be limited to the existing Metro facilities. Metro facilities are staffed with personnel trained in hazardous materials emergencies. Metro staff is available 24-hours a day through the Quality Assurance Department to respond to hazardous materials releases, and Metro sites frequently undergo emergency response drills. Therefore, it is not reasonably anticipated that the Proposed Project would emit hazardous air emissions, or handle an extremely hazardous substance or a mixture containing an extremely hazardous substance within one-quarter mile of a school.

Hazards Impact d: As discussed in Section 4.1.2 of the EIR, database searches revealed 469 environmental concern sites within one mile of the Proposed Project route, including 115 permitted underground storage tanks, 331 cleanup sites, and 23 sites of historical concerns. This includes two sites in the Cortese database of hazardous sites maintained by the Department of Toxic Substances Control. Construction activities could result in the discovery of unanticipated contamination at known release sites, potential environmental concern sites, or historical environmental concern sites. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. The Proposed Project would operate in repurposed existing travel lanes and would not operate on an existing hazardous materials site pursuant to pursuant to Government Code Section 65962.5.

Hazards Impact f: As discussed in Section 4.1.2 of the EIR, the Proposed Project would be constructed along or near several emergency/disaster routes, including the SR-134 freeway, Colorado Boulevard, Glenoaks Boulevard, Olive Avenue, and Lankershim Boulevard. Los Angeles County and each of the cities affected by the Proposed Project have developed emergency response plans. Temporary lane closures may be required, and emergency routes may be temporarily disrupted during construction activities. The Project Area is a fully built roadway network with parallel streets in every direction. Detour routes, of which there are multiple options, would be established in consultation with emergency service providers. Construction activities would not impede public access to emergency/disaster routes and would not interfere with an adopted emergency response plan or emergency evacuation plan. The Proposed Project would operate on existing roadways and would not affect the ability of emergency routes to serve the Project Area in the event of an emergency or disaster. Bus-only lanes would be open to emergency vehicles, which could improve response plans. During emergencies, the bus-only lanes would be open to all evacuating vehicles. Operational activities would not impede public access to emergency/disaster routes and would not interfere with an adopted emergency response plan or emergency evacuation plan.

Hazards Impact g: As discussed in Section 4.1.2 of the EIR, the Cities of Los Angeles, Burbank, Glendale, and Pasadena are Very High Fire Hazard Severity Zone according to the California Department of Forestry and Fire Protection database. However, the Project Area is also highly urbanized and well protected by existing emergency response. In the event of a wildland fire outbreak during the construction phase of the Proposed Project, the construction manager would comply with the emergency response procedures of the local fire and police departments to ensure the safe evacuation of on-site workers and to ensure that construction staging would not interfere with emergency services. While the stations and roadway modifications would be constructed in areas prone to wildfires, these structures would not result in impacts to wildland fires, nor would they exacerbate risk of loss, injury, or death involving wildland fires. The Proposed Project would operate on existing roadways and in a highly developed urbanized area that is adequately served by fire emergency services. In the event of a wildland fire outbreak during operation of the Proposed Project, bus operators would comply with local fire and police department emergency procedures to ensure that riders and operators are safely evacuated.

Reference. Chapter 4.0, Other Environmental Considerations, of the Draft EIR, pages 4-4 through 4-8.

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

Finding. For the reasons stated above and as set forth in the EIR, Metro finds that impacts related to hazards and hazardous materials would be less than significant.

7.9 HYDROLOGY AND WATER QUALITY

As discussed in Section 4.1.3 of the EIR, the Proposed Project would result in a less-than-significant impact related to hydrology and water quality with respect to the following significance thresholds:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Impacts. As discussed in Section 4.1.3 of the EIR, construction would include paving, striping, and reconstruction of sidewalks, which would result in an increase in surface water pollutants such as sediment, oil and grease, and miscellaneous wastes. Water quality would be temporarily affected if disturbed sediments were discharged via existing stormwater collection systems. Increased turbidity and other pollutants resulting from construction-related discharges can ultimately introduce compounds toxic to aquatic organisms, increase water temperature, and stimulate the growth of algae. Construction activities would disturb more than one acre and would require the construction contractor to prepare and implement one Storm Water Pollution Prevention Plan (SWPPP) applicable to each of the affected Cities in accordance with the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction Activity (Order No. 2009-0009-DWQ, NPDES No. CAR000002) (Construction General Permit). Implementation of the SWPPP during construction would ensure that water quality objectives, standards, and wastewater discharge thresholds would not be violated.

Regarding operational activities, the Proposed Project would result in a negligible change in impervious area and there would be no major sources of new pollutants. Because the Project Area is currently a transportation corridor, the water runoff from roadway surfaces would contain the same types of pollutants as expected under existing conditions. However, enhanced bus frequencies could result in small increases in potential pollutants from bus operations. Because the Proposed Project would replace 5,000 square feet or more of impervious surface area on an already developed site, per the County's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, as part of the stormwater program, SUSMP and Site-Specific Stormwater Mitigation Plans must be incorporated into the Project. Compliance with these regulations would require the inclusion of post-construction stormwater measures and low-impact development measures designed to minimize runoff flows and water quality degradation.

Reference. Chapter 4, Other Environmental Considerations, of the Draft EIR, pages 4-9 to 4-10.

Mitigation Measures. This impact would be less than significant with the incorporation of applicable laws and regulations and does not require mitigation measures.

Finding. For the reasons stated above, Metro finds that these impacts related to hydrology and water quality would be less than significant with regulatory compliance.

7.10 LAND USE AND PLANNING

As discussed in Section 4.1.4 of the EIR, the Proposed Project would result in a less-than-significant impact related to land use and planning with respect to the following significance thresholds:

- Physically divide an established community (Land Use Impact "a"); and
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Proposed Project adopted for the purpose of avoiding or mitigating an environmental effect (Land Use Impact "b").

Impacts. *Land Use Impact a:* As discussed in Section 4.1.4 of the EIR, construction activities would require temporary road, lane, and sidewalk closures, which would reduce pedestrian and vehicle mobility and access within and between local communities throughout the Project Area. The Proposed Project would operate entirely within existing transportation corridors and would not cause a change in land uses. Although there would be some turn restrictions and pedestrian crossing restrictions depending on the bus lane configuration, the Proposed Project would not physically divide an established community.

Land Use Impact b: Construction activities would be conducted in compliance with local land use plans and codes. It is anticipated that construction activities would take place between the hours of 7:00 a.m. and 9:00 p.m. on weekdays and 8:00 a.m. and 6:00 p.m. on Saturdays within the City of Los Angeles, in accordance with the Los Angeles Municipal Code. Within the City of Burbank, City of Glendale, and City of Pasadena, in accordance with the City Codes construction would typically occur between 7:00 a.m. and 7:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays. Nighttime activities are not anticipated to be needed to construct the Proposed Project. However, at this stage of the planning process and without a construction contractor, it cannot be confirmed if nighttime construction would be necessary for specialized construction tasks. (Refer to the Section 3.9 Noise of the Draft EIR for the nighttime construction noise analysis.) Should nighttime construction be necessary, the construction contractor would be required to coordinate with the jurisdictions to obtain necessary permits, such as a variance to the Noise Ordinance in the City of Los Angeles. For these reasons, construction of the Proposed Project would not conflict with local land use plans.

Regarding operations, the Proposed Project corridor is an existing transportation route with ongoing bus service, and therefore, the Proposed Project operations would be compatible with existing land uses. This Proposed Project would be consistent with SCAG regional goals which focus upon land use and growth patterns that encourage transit and non-motorized transportation use by focusing growth along major transportation corridors in the region. The local land use plans for the jurisdictions along the project corridor include several goals and

policies centered around establishing transit centers, maximizing transit service, accommodating future traffic demands, reducing reliance on the automobile, decreasing congestion, minimizing environmental impacts, increasing transit ridership, and developing compact pedestrian-oriented, mixed-use neighborhoods with accommodations for bicyclists. The Proposed Project would be consistent with or supportive of many of the goals and policies of the applicable jurisdictions along the corridor. The Proposed Project would not conflict with local land use plans.

Reference. Chapter 4.0, Other Environmental Considerations, of the Draft EIR, page 4-14 through 4-16.

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

Finding. For the reasons stated above and as set forth in the EIR, Metro finds that impacts related to land use and planning would be less than significant.

7.11 NOISE

As discussed in Section 3.9 of the EIR, the Proposed Project would result in a less-than-significant impact related to noise and vibration with respect to the following significance thresholds:

- Generate 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 3.9-1 (operations only)); and
- Generate excessive groundborne vibration or groundborne noise levels (Impact 3.9-2 (operations only)).

Impacts. *Impact 3.9-1*: As discussed in Section 3.9.4 of the EIR, operation of the Proposed Project would impact the noise environment along the corridor in two key ways. First, it would increase the number of buses traveling in the Project Area, with 90,200 annual revenue hours and 1,348,500 annual revenue miles in 2042. However, Metro bus service in the Project Area may be reduced in frequency or consolidated as part of the NextGen Bus Plan and/or in conjunction with the opening of the Project. These potential changes have not been implemented and are therefore not accounted for in the EIR noise analysis. The result is a more conservative analysis with louder background noise levels related to existing bus service. Second, the service would shift drivers from personal vehicles to BRT services, reducing 86,659 daily vehicle miles of travel throughout the region by 2042, of which 13,339 miles would be entirely reduced within the Project Area and 68,278 miles would be reduced from trips that start or end in the Project Area. The detailed analysis prepared for the Draft EIR demonstrates that operation of the Proposed Project would not significantly increase permanent noise levels.

Impact 3.9-2: As discussed in Section 3.9.4 of the EIR, operational vibration impacts would be attributed to the rubber tires on the buses. Under the Federal Transit Administration's Transit Noise and Vibration Assessment Manual, the use of rubber tires would not result in a significant

vibration-related impact because the Proposed Project does not include substantial infrastructure irregularities like expansion joints, speed bumps, or other design features that create unevenness in the road surface.

Reference. Section 3.9, Noise, of the Draft EIR, page 3.9-15 through 3.9-31.

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

Finding. For the reasons stated above and as set forth in the EIR, Metro finds that impacts related to operational noise would be less than significant.

8. ENVIRONMENTAL RESOURCES FOUND TO NOT BE IMPACTED

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

- Transportation (CEQA Guidelines Section 15064.3, subdivision (b) during operations; hazards due to a geometric design feature during construction)
- Aesthetics (Conflict with applicable zoning and other regulations governing scenic quality during construction; substantial light or glare)
- Agriculture and Forestry Resources (farmland conversion; existing zoning for agricultural use; forest lands)
- Biological Resources (Adverse effect on special-status plant species, special-status wildlife species (operations); adverse effect on riparian or other sensitive natural community, adverse effect on federally protected wetlands; interfere with wildlife movement (operations); conflict with local policies or ordinances protecting biological resources (operations))
- Cultural Resources (archaeological resources during operations; human remains during operations)
- Geology and Soils (seismic activities and landslides during construction; surface fault rupture during operations; soil erosion; unstable soil during construction; subsidence during operations; expansive soil; alternative wastewater disposal systems; paleontological resource or site or unique geologic feature during operations)
- Greenhouse Gas Emissions (GHG) (generation of GHG emissions; conflicts with GHG reduction plans, policies, or regulations)
- Hazards and Hazardous Materials (proximity to private airstrips and public-use airports)
- Hydrology and Water Quality (groundwater supplies and management plans; drainage; water inundation; water quality control plans)
- Mineral Resources (loss of a known mineral resource; loss of a locally important mineral resource)
- Noise (exposure of persons to noise from private airstrips or public-use airports)
- Population and Housing (induce substantial population growth; substantial displacement of people or housing)
- Public Services (fire protection, police protection, schools, parks, or other public facilities)

- Recreation (parks and recreational facilities)
- Tribal Cultural Resources (impacts to California Native American Tribal Cultural Resources during operations)
- Utilities and Service Systems (relocation or construction of new or expanded water, wastewater treatment or storm water drainage; electric power, natural gas, or telecommunications facilities; water supplies; wastewater; solid waste)
- Wildfire (emergency response or evacuation plans; exacerbate wildfire risk and associated mitigating infrastructure; risk from post-fire slope instability or drainage changes)

Impact. No impacts would occur.

Reference. Section 3.1, Transportation, pages 3.1-28 through 3.1-29; Section 3.2, Aesthetics, pages 3.2-26; Section 3.4, Biological Resources, pages 3.4-10 through 3.4-13; Section 3.5, Cultural Resources, pages 3.5-18 through 3.5-19; Section 3.6, Energy Resources, page 3.6-23; Section 3.7, Geology and Soils, page 3.7-12 through 3.7-18; Section 3.8, Greenhouse Gas Emissions, pages 3.8-14 through 3.8-17; Section 3.9, Noise, page 3.9-31; Section 3.10, Tribal Cultural Resources, pages 3.10-5 through 3.10-7; and Chapter 4, Other Environmental Draft Considerations, pages 4-1 through 4-31 of the Draft EIR.

Mitigation Measures. No impact would occur and mitigation measures are not required.

Findings. Metro finds that the Proposed Project would not result in impacts to one or more aspects of the following resources, as described above:

- Transportation
- Agriculture and Forestry Resources
- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

9. CUMULATIVE IMPACTS

The cumulative impact analysis in the EIR considers the combined effect of the Proposed Project and Related Projects. Related Projects that are considered in the cumulative impact analysis are those projects that may occur in the Project vicinity within the same timeframe as the Proposed Project. In this context, Related Projects includes past, present, and reasonably probable future projects. Refer to Chapter 5, Cumulative Impacts, of the Draft EIR and Chapter 3 of the Final EIR for a comprehensive list of projects considered in the cumulative analysis.

As stated in CEQA Guidelines Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from a proposed project. Metro finds that there is no potential for a cumulative impact related to Agricultural and Forestry Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, or Wildfire.

9.1 TRANSPORTATION

Conflict with Programs, Plans, Ordinances, or Policies. Construction activities could interfere with circulation system, including transit, roadway, bicycle and pedestrian facilities through temporary lane closures, equipment activity, staging areas, and truck activity. Mitigation Measures **TRA-1** through **TRA-4** would ensure that the Proposed Project would not interfere with transit, traffic circulation and access, pedestrian operations and circulation, or bicycle operations and circulation during construction. Mitigation Measure **TRA-6** would reduce potential construction impacts on emergency vehicle access by requiring early notification and coordination with emergency service providers as part of the Traffic Management Plan. For this reason, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to transportation is not cumulatively considerable during construction.

Regarding operational activities, the Proposed Project would generally include a combination of dedicated bus lanes (running along the center, median, side or curb lane) and mixed traffic operations. It is not expected that the cumulative projects would substantially diminish pedestrian circulation along the corridor and/or result in hazards due to a geometric design feature or incompatible uses. The related projects, independent of the Proposed Project, are not expected to result in the removal of bicycle lanes or any other operational adverse cumulative impacts on bicycle lanes. Mitigation Measure **TRA-5** would ensure that the Proposed Project is designed in a manner that is consistent with local policies, including the City of Los Angeles Mobility Plan 2035, avoiding potential conflicts between the Proposed Project operations and bicycles. Emergency vehicles will be permitted to use the dedicated bus lanes along the Proposed Project corridor, and therefore emergency response time under cumulative conditions would be no worse than under current conditions. For this reason, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to transportation is not cumulatively considerable during operations.

CEQA Guidelines Section 15064.3, subdivision (b). The Proposed Project is expected to decrease VMT and is also aligned with long-term environmental goals and relevant plans for the region and municipalities. The Proposed Project has a finding of less-than-significant for VMT, which results in a less-than-significant cumulative impact for VMT. For this reason, Metro finds that the contribution of the Proposed Project's activities to the significant cumulative impact associated with VMT is not cumulatively considerable.

9.2 AESTHETICS

Scenic Vistas. There are no formal or designated scenic vistas within the Project Area. Scenic viewing areas are available at higher elevations in the San Gabriel Mountains and Santa Monica Mountains. Views from these vista points would be unaffected by the Proposed Project. For this reason, Metro finds that there is no potential for the Proposed Project to combine with past, present, and reasonably foreseeable future projects to create a cumulative impact related to scenic vistas.

Scenic Resources within State Scenic Highway Corridors. The Project Area and its surroundings are not within the viewshed of any scenic highway. For this reason, Metro finds that there is no potential for the Proposed Project to combine with past, present, and reasonably foreseeable future projects to create a cumulative impact related to scenic resources within State scenic highway corridors.

Visual Character or Quality. The Proposed Project would result in permanent alterations to the street where bus lanes are proposed and along sidewalks and medians at the locations of station platforms. Mitigation Measures **VIS-1** and **VIS-2** would reduce potential visual impacts by requiring site-specific public art and streetscape beautification. The Proposed Project would follow Metro's Transit Service Policies & Standards, Public Art Policy, Systemwide Station Design Standards, and Standard/Directive Drawings. For this reason, Metro finds that the contribution of the Proposed Project's activities to the significant cumulative impact associated with visual character or quality is not cumulatively considerable.

Light and Glare. Because the Proposed Project is located in a developed, urban area, there is a substantial amount of existing lighting and glare from streetlights, buildings, vehicles, and other sources. The primary elements of the Proposed Project that could result in lighting, glare, and shading are the station upgrades and additional buses. These elements would not be expected to result in a substantial change in existing lighting, glare, or shading. For this reason, Metro finds that the contribution of the Proposed Project's activities to the significant cumulative impact associated with light and glare is not cumulatively considerable.

9.3 AIR QUALITY

Consistency with Air Quality Plans. Implementation of the Proposed Project would not introduce new growth in population, housing, or employment to Los Angeles County or the greater SCAG region. In addition, emissions modeling demonstrated that that the Proposed Project would not generate significant construction or operational emissions. Therefore, the Proposed Project would not induce growth exceeding the assumptions within the SCAQMD AQMP. In addition, the Proposed Project would reduce VMT and associated transportation criteria air pollutant emissions in the Project Area as automobile trips would be replaced with zero emissions, electric buses. For these reasons, Metro finds that the impact related to the Proposed Project's consistency with the AQMP would not be cumulatively considerable.

Cumulatively Considerable Net Increase of Criteria Pollutant for which the Region is Non-Attainment. The SCAQMD has promulgated guidance that if daily emissions generated by construction or operation of a project remain below the regional mass daily thresholds, those emissions would not result in a significant air quality impact under regionally cumulative considerations. Emissions modeling demonstrated that that the Proposed Project would not generate significant construction or operational emissions. Therefore, the Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. For this reason, Metro finds that the Proposed Project's incremental contribution to the significant cumulative impact associated with violations of air quality standards and substantial pollutant concentrations is not cumulatively considerable.

Substantial Pollutant Concentrations. Construction and operational activities were assessed for exposure to TACs and localized criteria pollutants. Regarding construction TACs, the greatest potential for TAC emissions would be related to diesel particulate matter emissions associated with heavy equipment operations. Construction activities associated with the Proposed Project would be sporadic and short-term in nature. Metro has committed to using equipment outfitted with engines meeting Tier 4 emissions standards that would substantially reduce diesel PM emissions and associated exposures.

Operational activities would not include localized emissions. The only potential source of localized emissions associated with bus operations would be pollutants from bus idling. The Proposed Project would include zero emission vehicles and there would be no exhaust emissions. Further, the enhancement of public transit service over this approximately 19-mile corridor would reduce use of passenger vehicles and trucks for travel, as people shift increasingly to public transit. As such, the long-term operation of BRT service would reduce TAC emissions from motor vehicles.

For these reasons, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to the substantial pollutant concentrations would not be cumulatively considerable.

9.4 BIOLOGICAL RESOURCES

Wildlife Species, Habitats, and Wetlands. Construction activities would include creating bus stops, restriping existing roadway, and other roadway modifications (i.e., removal of existing medians) and would not contribute to development in the Project Area. The Proposed Project could result in temporary impacts on plants, bats, and bird species through the removal of street trees to construct stations. Mitigation Measure **BIO-1** would mitigate inadvertent impacts to biological resources during construction activities by ensuring compliance with the Migratory Bird Treaty Act and California Fish and Game Code (Sections 2126, 3503, 3513, and 3800).

Operational activities would not affect the Coastal Sage Scrub community along SR-134. In addition, there is already a high level of human activity, night lighting, and noise and the Proposed Project would not increase levels of human activity, night lighting, or noise. Therefore, operation of the Proposed Project would not result in impacts on any species identified as a candidate, sensitive, or special-status. Once construction is complete, no additional removal of

trees would be required; therefore, project operation would not interfere 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.

For the reasons stated above, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to wildlife species, habitats, and wetlands would not be cumulatively considerable.

9.5 CULTURAL RESOURCES

Historical Resources. Within the cumulative setting, there are a total of 23 designated properties (listed in the National, California, and/or local register), including 16 contributors to historic districts, and 29 properties previously surveyed and evaluated as potentially eligible (for listing in the National, California, and/or local Register), including eight that are contributors to a potential historic district. An additional six potentially significant properties were identified through site reconnaissance efforts conducted for the Proposed Project. During construction and operational activities, the Proposed Project has the potential to affect historic streetlights on Central Avenue and Broadway in the City of Glendale that are within proposed station platform footprints and historic buildings in the Cities of Los Angeles, Burbank, Glendale, and Pasadena that are immediately adjacent to proposed station platform footprints. Mitigation Measure **CUL-1** would mitigate impacts to historic resources by ensuring that the Proposed Project design would be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties Rehabilitation Standards. Effects to historic resources would not be significant with mitigation. For the reasons stated above, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to historic resources would not be cumulatively considerable.

Archaeological Resources. Although much of the Project Area is developed and paved, there is a potential for buried archaeological deposits to exist. The potential for an individual project to impact significant archaeological resources is unknown but it is possible that cumulative growth and development in the Project Area could have impacts on significant archaeological and paleontological resources. Mitigation Measure **CUL-2** would mitigate inadvertent impacts to potential subsurface archaeological deposits during construction activities. There is no potential for the Proposed Project to encounter sub-surface archaeological resources during operations. For the reasons stated above, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to archaeological resources would not be cumulatively considerable.

9.6 ENERGY RESOURCES

Wasteful, Inefficient, or Unnecessary Energy Consumption. Relative to existing petroleum-based transportation fuels consumption in Los Angeles County, construction of the Project would temporarily increase annual diesel fuel consumption within the County by approximately 0.17 percent and would temporarily increase annual gasoline fuel consumption by approximately 0.0002 percent. The Proposed Project would adhere to the provisions of the

Metro Green Construction Policy to control and minimize energy use. Energy demand would be within the existing and planned electricity and natural gas capacities.

Operational activities would result in changes (net benefits) to energy resources consumption through direct electricity demand for zero emission vehicle bus propulsion and indirect, reduction of transportation fuels combustion from passenger vehicles on the regional roadway network. Based on 2019 Metro usage, operations would increase systemwide electricity consumption by 1.1 percent. In addition to direct energy consumption, implementation of the Proposed Project would reduce on-road regional VMT. Implementation of the Proposed Project would reduce annual VMT by over 30 million, and would decrease regional gasoline and diesel fuels consumption by 755,140 gallons and 168,608 gallons, respectively. The effects of Proposed Project operations would reduce regional petroleum-based energy consumption and would improve regional transportation energy efficiency.

For the reasons stated above, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to energy resources would not be cumulatively considerable.

Obstruction or Conflict with Energy Plan. All equipment and vehicles that would be used in construction activities would comply with applicable California Air Resources Board regulations, the Pavley and Low Carbon Fuel Standards, and the Corporate Average Fuel Economy Standards. The Proposed Project does not conflict with Metro design criteria or California Code of Regulations Title 24 (including Part 1 - California Building Standards Administrative Code, Part 2 - California Building Code, Part 6 - California Energy Code, Part 11 - California Green Building Standards Code (CAL Green Code), and Part 12 - California Reference Standards Code). The Proposed Project would adhere to the provisions of the Metro Green Construction Policy to control and minimize emissions to the maximum extent feasible. The BRT system would reduce auto passenger vehicle trips and reduce reliance on petroleum-based transportation fuels. The benefits of the Proposed Project are consistent with the goals, objectives, and policies of SCAG and the Cities of Los Angeles, Burbank, Glendale, and Pasadena outlined in the local regulatory framework above. As the renewable energy portfolios of Metro and the Los Angeles Department of Water and Power expand over time, natural resources consumption to provide the electricity required for BRT operations would become more energy efficient. The Proposed Project would not conflict with any adopted plan or regulation to enhance energy efficiency or reduce transportation fuels consumption. In addition, the Proposed Project would not interfere with renewable portfolio targets and would not result in a wasteful or inefficient expenditure of energy resources. The Proposed Project would positively contribute to statewide, regional, and local efforts to create a more efficient and sustainable transportation infrastructure network.

For the reasons stated above, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to energy resources would not be cumulatively considerable.

9.7 GEOLOGY AND SOILS

Earth Movement. Construction activities would not involve substantial earthmoving along slopes, such that existing landslide risks would be worsened or exacerbated. Therefore, no construction impact would occur related to seismic activities, including landslides. The Proposed Project would be designed based on the latest versions of local and State building codes and regulations in order to counteract erosion. There is no potential for the surface-running BRT to result in substantial soil erosion or the loss of topsoil or risk from expansive soils. Regarding operational activities, the Proposed Project would be located in a seismically active region. There is potential for operational activities to be influenced by earthquakes and related effects, such as ground shaking and liquefaction. Mitigation Measure **GEO-1** would mitigate inadvertent impacts to geology and soils during construction activities by ensuring the Proposed Project is designed to limit potential seismic impacts. For the reasons stated above, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to earth movement would not be cumulatively considerable.

Paleontological Resource or Unique Geologic Feature. Paleontological resources have been recorded from the subsurface of the Project Area and Project Vicinity. However, due to the minimal amount of deep excavation with the potential to encounter native sediments with high paleontological potential (i.e., Pleistocene-age older sedimentary deposits and Miocene-age Topanga Formation), the Proposed Project would not significantly impact paleontological resources. For the reasons stated above, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to paleontological resources or unique geologic features would not be cumulatively considerable.

9.8 GREENHOUSE GAS EMISSIONS

There is an existing cumulative impact in the Project Area related to GHG emissions. The cumulative setting is both regional and statewide. The State of California, through AB 32 and SB 32, has acknowledged that GHG emissions are a statewide impact. Emissions generated by the Proposed Project combined with past, present, and reasonably probable future projects could contribute to this impact. The CEQA Guidelines emphasize that the effects of GHG emissions are cumulative in nature and should be analyzed in the context of CEQA's existing cumulative impacts analysis. The OPR acknowledges that although climate change is cumulative in nature, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment.

Per guidance from the SCAQMD, construction amortized annually and operational emissions are considered together over a 30-year period. The Proposed Project would reduce VMT and associated transportation GHG emissions in the Project Area. CO_2e emissions would be reduced by approximately 54 million metric tons per year. Automobile trips would be replaced with zero-emissions, electric buses. The Proposed Project would be consistent with the goals and policies of applicable GHG reduction plans in the Plan Area including SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), CARB's 2017 Scoping Plan, Metro Climate Action and Adaptation Plan 2019, Los Angeles Green New Deal, City of

Burbank GGRP, Greener Glendale Plan, and the City of Pasadena CAP. Each of these plans is, in and of itself, a GHG reduction plan aimed to reduce cumulative GHG emissions at the local level and beyond. Therefore, the Proposed Project would not have a cumulatively considerable contribution to the existing cumulative impact.

9.9 HAZARDS AND HAZARDOUS MATERIALS

Significant Hazard to the Public or Environment. Construction activities would involve minimal ground disturbance and excavation. Construction activities could result in the discovery of unanticipated contamination at known release sites, potential environmental concern sites, or historical environmental concern sites. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. As previously discussed, the SCAQMD regulates disposal of asbestos (Rule 1403) and contaminated soils (Rule 1166). There would be no hazardous emissions associated with operations of the Proposed Project. For these reasons, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to significant hazards to the public or environment would not be cumulatively considerable.

Release of Hazardous Materials from Upset or Accident Conditions. As discussed above, the handling, transport, and disposal of all hazardous materials during construction would be done according to the applicable regulations to reduce the risk of accidental release into the environment. Regarding operations, vehicle maintenance activities would require the use of detergents and cleansers. The potential for exposure to these hazards and hazardous materials would be limited to the existing Metro facilities. Metro facilities are staffed with personnel trained in hazardous materials emergencies. Metro staff is available 24-hours a day through the Quality Assurance Department to respond to hazardous materials releases, and Metro sites frequently undergo emergency response drills. There would be no hazardous emissions associated with operations of the Proposed Project. For this reason, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to the release of hazardous materials from upset or accident conditions would not be cumulatively considerable.

Hazardous Conditions at Schools. There are multiple schools located within a quarter-mile of the Proposed Project alignment. However, the Proposed Project and Related Projects would comply with strict regulations administered by local, State, and federal agencies, ensuring that their impacts to schools would be less than significant. For this reason, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to hazardous materials at schools would not be cumulatively considerable.

Hazardous Materials Sites. There is an existing cumulative impact in the Project Area related to known hazardous sites, including 469 environmental concern sites, and associated remediation efforts. The Proposed Project combined with past, present, and reasonably probable future projects could contribute to this existing cumulative impact. Construction activities would involve minimal ground disturbance and excavation, though could result in the discovery of unanticipated contamination at known release sites, potential environmental concern sites, or historical environmental concern sites. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal,

State, and local regulations. Therefore, the Proposed Project construction activities would not have a cumulatively considerable contribution to the existing cumulative impact. The Proposed Project operational activities would also not have a cumulatively considerable contribution to the existing cumulative impact regarding hazardous materials sites.

Safety Hazard Near Public Airports or Private Airstrips. The Project Site and its surroundings are not located near public airports or private airstrips. For this reason, Metro finds that the Proposed Project combined with past, present, and reasonably probable future projects would have no impact related to safety hazards near public airports or private airstrips.

Exposure of People or Structures to Risk Involving Wildland Fires. Neither the Project Site nor its surroundings are susceptible to wildland fires. For this reason, Metro finds that the Proposed Project combined with past, present, and reasonably probable future projects would have no impact related to wildland fires.

Physical Interference of Emergency Plans and Emergency Evacuation Plans. The Proposed Project and the Related Projects would not require the permanent closure of emergency/disaster routes or impede emergency vehicle access to the Project Site and its surrounding area. Per state and local regulations, emergency vehicle access would be maintained at all times during construction and operation of the Proposed Project and Related Projects. For the reasons stated above, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative impact related to adopted emergency response plans or emergency evacuation plans would not be cumulatively considerable.

9.10 LAND USE AND PLANNING

Physically Divide an Established Community. The Proposed Project would not physically divide an established community. For this reason, Metro finds that the Proposed Project combined with past, present, and reasonably probable future projects would have no impact related to physically divide an established community.

Conflict with Applicable Land Use Plans or Policies. The Proposed Project would be compatible with the land use plans, goals, and policies adopted by the regional and local jurisdictions within the Project Area. While it is anticipated that land uses in the Project Area will change over time to address growing population and regional demands for infrastructure and services, individual City jurisdictions and metropolitan planning organizations such as SCAG are responsible for planning such development. Land uses surrounding the Proposed Project stations may intensify due to transit orientated development pressures and zoning initiatives that have been planned and encouraged by the Project Area cities including the Cities of Los Angeles, Glendale, Burbank, and Pasadena. This growth pattern would be consistent with regional planning efforts to focus future growth in areas served by transit to address environmental concerns related to climate change and availability of services and infrastructure to meet future demand. Accordingly, the Proposed Project would be consistent with regional and local plans aimed at improving regional mobility and focusing growth in areas well served by transit. For the reasons stated above, Metro finds that the Proposed Project's incremental

contribution to the potentially significant cumulative impact related to land use plans would not be cumulatively considerable.

9.11 NOISE

Exposure to Excessive Noise Levels. The Proposed Project's construction activities could increase ambient noise levels by approximately 15 dBA L_{eq} near any of the potential 22 station construction sites along the alignment, generating significant increases before mitigation measures are applied. Mitigation Measure **NOI-1** would reduce the impact to less than significant by requiring noise monitoring and control measures when levels exceed allowable standards. Therefore, Metro finds that the Proposed Project's contribution to the potentially significant cumulative construction noise impact would not be cumulatively considerable.

The Proposed Project would reduce VMT and associated transportation noise from operation of motor vehicles in the Project Area as people shift to public transit. As a result, even with the addition of BRT service, permanent increases in noise would be minimal and not significant. Therefore, Metro finds that the Proposed Project's incremental contribution to the potentially significant cumulative operational noise impact would not be cumulatively considerable.

Exposure to Excessive Groundborne Vibration. There is no cumulative vibration impact in the Project Area and the Proposed Project would not result in a significant vibration impact with implementation of Mitigation Measure **NOI-2** for construction activities. Therefore, Metro finds that the Proposed Project's contribution to the potentially significant cumulative construction vibration impact would not be cumulatively considerable.

Exposure to Excessive Noise Levels Associated with Public Airports or Private Airstrips. The Proposed Project and Related Projects are not within the proximity of a public airport. For this reason, Metro finds that the Proposed Project combined with past, present, and reasonably probable future projects would not create a cumulative impact related to excessive noise associated with public airports or private airstrips.

9.12 TRIBAL CULTURAL RESOURCES

There is an existing cumulative impact in the Project Area related to tribal cultural resources. The cumulative setting is the areas of potential disturbance. The Kizh Nation, Fernandeno Tataviam, and Gabrieleno/Tongva San Gabriel Band of Mission Indians tribal representatives identified areas of high sensitivity within the Project Area; however, no known tribal cultural resources were identified through the Assembly Bill 52 consultation process. Most of the Related Projects are development or transportation projects, whose construction could include excavation that could disturb buried tribal cultural resources, if extant. The Proposed Project combined with past, present, and reasonably probable future projects could contribute to the existing cumulative impact.

Although much of the Project Area is developed and paved, there is a potential for buried tribal cultural resources deposits to exist during earthwork activities. The potential for an individual project to impact significant tribal cultural resources is unknown but it is possible that cumulative

growth and development in the Project Area could have impacts on significant tribal cultural resources. Mitigation Measure **CUL-1** would mitigate inadvertent impacts to potential subsurface tribal cultural resources during construction activities by ensuring proper treatments. Effects to tribal cultural resources would not be significant with mitigation. There is no potential for the surface-running BRT to encounter tribal cultural resources. For this reason, Metro finds that the Proposed Project combined with past, present, and reasonably probable future projects would not create a cumulative impact related to tribal cultural resources.

10. ROUTE OPTIONS, DESIGN CONFIGURATION OPTIONS, ALTERNATIVES, AND MITIGATION MEASURES

CEQA provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" (PRC, § 21002.) However, "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." (*Ibid*.)

As defined by CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors. (PRC, § 21061.1; CEQA Guidelines, § 15126.6(f)(1).) The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (Sequoyah Hills Homeowners Assn. v. City of Oakland (1993), 23 Cal.App.4th 704, 715.) Moreover, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors." (City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 417; California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957.)

10.1 ROUTE OPTIONS AND ALTERNATIVES

Pursuant to CEQA Guidelines Section 15126.6(a), the Draft EIR described and evaluated the relative merits of a range of reasonable alternatives to the Proposed Project that would avoid or create substantially lesser impacts than the significant impacts of the Proposed Project.

The Draft EIR assessed route options for the BRT. This was necessary due to public feedback during the completion of the Alternatives Analysis and EIR scoping period. It was not possible to reach a consensus on one route preferred by Metro, the cities, stakeholders, and general public. Metro determined that stakeholders and decision-makers would best be informed about the Proposed Project by equally evaluating the potential environmental impacts of multiple route alignments. Two CEQA alternatives were also assessed in the Draft EIR: a No Project (Alternative 1) and an Improved Bus Service Alternative (Alternative 2).

The following describes the Route Options assessed but not included as part of the Proposed Project in the Final EIR.

Route Option A2 in North Hollywood. This route would follow Lankershim Boulevard between the North Hollywood Station and the SR-134 freeway interchange, utilizing a combination of side and curb-running bus lanes. A proposed station would be located on Lankershim Boulevard at Hesby Street.

Route Option E2 in Glendale. This route would operate on Central Avenue between Glenoaks Boulevard and Colorado Street (combination of general-purpose traffic lanes and side-running bus lanes), then on Colorado Street/Boulevard between Central Avenue and Broadway (primarily side-running bus lanes). Proposed stations would be located on Central Avenue at Lexington Drive and Americana Way. Proposed stations would also be located along Colorado Street/Boulevard at Brand Boulevard, Glendale Avenue and Verdugo Road.

Route Option E3 in Glendale. This route would operate in general-purpose traffic lanes between Glenoaks Boulevard and the SR-134 freeway via Central Avenue. Eastbound service would be provided via Sanchez Drive and westbound service would be provided along Goode Avenue to access the SR-134 freeway at Brand Boulevard. Lastly, the segment would then run along SR-134 between Brand Boulevard and Harvey Drive using general-purpose traffic lanes. Proposed stations would be located on Goode/Sanchez near Brand Boulevard and at Harvey Drive.

Route Option F2 in Eagle Rock. This route would operate on Colorado Boulevard between Broadway and Linda Rosa Avenue (SR-134 freeway interchange) in side-running bus lanes. There would be three stations serving Eagle Rock – Eagle Rock Plaza (near Sierra Villa Drive), Eagle Rock Boulevard, and Townsend Avenue. Under this configuration, the existing buffered bike lanes would be converted to 11- or 12-foot shared bus-and-bicycle lanes. Bicycles would be allowed to operate within the bus lane. Buses would maneuver into the mixed-flow lanes to pass cyclists as-needed. A bicycle bypass lane would be provided behind the stations to avoid bus-bicycle conflicts in the loading zone.

Route Option F3 in Eagle Rock. This route would run along SR-134 between Harvey Drive and Figueroa Street, Figueroa Street between SR-134 and Colorado Boulevard, and on Colorado Boulevard between Figueroa Street and SR-134 via the N. San Rafael Avenue Interchange. All segments utilize general purpose traffic lanes with a station pair on the intersection of Figueroa Street and Colorado Boulevard.

Route Option G2 in Pasadena. This route would operate via the SR-134 freeway between Colorado Boulevard in Eagle Rock and the Colorado Boulevard exit in Pasadena. A proposed station would be located at Arroyo Parkway near the Metro L Line (Gold).

Route Option H2 in Pasadena. This route would operate in a general-purpose traffic lane along Union Street in the westbound direction (one-way street) and along Green Street in the eastbound direction (one-way street) between Raymond Avenue and Hill Avenue. Proposed

stations would be located at Los Robles Avenue, Lake Avenue and at the Eastern Terminus at Hill Avenue adjacent to PCC.

The No Project Alternative, or Alternative 1, is required by CEQA Guidelines Section 15126.6 (e)(2) and assumes that the Proposed Project would not be implemented by Metro. The No Project Alternative allows decision-makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. The No Project Alternative is evaluated in the context of the existing transportation facilities in the Project Area and other capital transportation improvements and/or transit and highway operational enhancements that are reasonably foreseeable.

The Improved Existing Bus Service Alternative, or Alternative 2, would implement improved existing bus service instead of BRT. The bus line would be a local express service with some BRT characteristics. The service may be as frequent as that proposed for BRT, though its ability to attract as much ridership may be less due to less travel time savings and amenities, meaning a slightly less frequent service would be operated compared to that proposed for the BRT Project. The buses would operate in mixed-flow traffic with transit signal priority systems. Stops would be more frequent than the BRT line but less frequent than local bus lines (typically every 0.6 miles on average). Travel times would be faster than for local service but slower than the travel times expected from the BRT Project. Stops would occur at existing bus stations and there would be no median-running, center-running, or side-running configuration. Physical improvements would be limited to new signs at bus stops as well as shelters with solar lighting, bench and trash receptacle as a minimum level of bus stop amenity. Alternative 2 would not include curb extensions, elimination of parking, or changes to bicycle lanes. Like the Proposed Project, this alternative would not require a Maintenance and Storage Facility, as buses would be maintained at existing Metro facilities. Similar to BRT buses, buses would have low-floor design to allow for faster and easier boarding and alighting. The fleet would be equipped for all door boarding.

10.2 FINDINGS FOR ROUTE OPTIONS

Route Option A2 in North Hollywood would contribute to some of the Proposed Project's objectives, including enhancing connectivity to Metro and other regional transit services. However, there is limited right-of-way on Lankershim Boulevard for Project components. This route option has increased effects to on-street parking, sidewalk widths, and requires converting mixed-flow travel lanes to dedicated bus lanes along a constrained portion of Lankershim Boulevard. There was also community preference for Route Option A1 in North Hollywood. For these reasons, Metro finds that Route Option A2 inadequately satisfies the objectives of the Proposed Project and is therefore infeasible.

Route Option E2 in Glendale would contribute to some of the Proposed Project's objectives, including enhancing connectivity to Metro and other regional transit services. However, there is limited right-of-way on Colorado Street for Project components. Additionally, this option was demonstrated to result in less ridership than the Proposed Project route. Route Option E2 would not improve regional transit ridership to the same degree that the Proposed Project would. For

these reasons, Metro finds that Route Option E2 inadequately satisfies the objectives of the Proposed Project and is therefore infeasible.

Route Option E3 in Glendale would contribute to some of the Proposed Project's objectives, including enhancing connectivity to Metro and other regional transit services. However, because this Route Option would require buses to operate entirely in mixed-flow traffic in a congested traffic area, Metro would not be able to completely meet the Proposed Project's objectives of advancing a premium transit service that improves service reliability and is more competitive with auto travel. In addition, this route option does not achieve the project objective of improving transit access to local and regional activity and employment centers, as the alignment bypasses the core of Glendale. For these reasons, Metro finds that Route Option E3 inadequately satisfies the objectives of the Proposed Project and is therefore infeasible.

Route Option F2 in Eagle Rock would contribute to some of the Proposed Project's objectives, including enhancing connectivity to Metro and other regional transit services. However, there was a lack of community support for this Route Option. Additionally, this option conflicted with City of Los Angeles goals and policies for bicycle facilities. For these reasons, Metro finds that Route Option F2 inadequately satisfies the objectives of the Proposed Project and is therefore infeasible.

Route Option F3 in Eagle Rock would contribute to some of the Proposed Project's objectives, including enhancing connectivity to Metro and other regional transit services. However, because this Route Option would require buses to operate entirely in mixed-flow traffic in a congested traffic area, Metro would not be able to completely meet the Proposed Project's objectives of advancing a premium transit service that is more competitive with auto travel. Additionally, Route Option F3 would not improve service reliability and regional transit ridership to the same degree as the Proposed Project, due to slower service as a result of travel in mixed-flow traffic lanes. This Route Option also decreases accessibility to the route for the Eagle Rock community. For these reasons, Metro finds that Route Option F3 inadequately satisfies the objectives of the Proposed Project and is therefore infeasible.

Route Option G2 in Pasadena would contribute to some of the Proposed Project's objectives. However, this Route Option would not provide as direct a connection to the Metro L Line (Gold) as the Proposed Project, thus not enhancing connectivity to Metro and other regional transit services as effectively as the Proposed Project. For this reason, Metro finds that Route Option G2 inadequately satisfies the objectives of the Proposed Project and is therefore infeasible.

Route Option H2 in Pasadena would contribute to some of the Proposed Project's objectives, including improving transit access to major activity centers such as Pasadena City College. However, this Route Option does not provide as direct access to the core of the activity and employment center in the Pasadena commercial district as the Proposed Project. For this reason, Metro finds that Route Option H2 inadequately satisfies the objectives of the Proposed Project and is therefore infeasible.

10.3 FINDINGS FOR THE NO PROJECT ALTERNATIVE

Although pursuing the No Project Alternative would avoid the Proposed Project's significant impacts, Metro finds that specific economic, legal, social, technological, and other considerations render the No Project Alternative identified in the Draft EIR infeasible (CEQA Guidelines Section 15091(a)(3)). By pursuing the No Project Alternative, Metro would not improve accessibility for disadvantaged communities; improve transit access to major activity and employment centers; enhance connectivity to Metro and other regional transit services; provide improved passenger comfort and convenience; or support community plans and transit-oriented community goals. Most importantly, Metro would not be able to meet the Proposed Project's objectives of advancing a premium transit service that is more competitive with auto travel. For these reasons, Metro finds that the No Project Alternative is not feasible.

10.4 FINDINGS FOR ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be identified among the alternatives that are evaluated in the EIR. As described in the Draft EIR, the No Project Alternative is considered the environmentally superior alternative because there would be no physical changes to the existing environment resulting in construction or operational impacts. If the No Project Alternative is identified as the environmentally superior, CEQA requires identification of the environmentally superior alternative other than the No Project Alternative from among the Proposed Project and the other alternatives evaluated in the Draft EIR. The Improved Existing Bus Service Alternative is the environmentally superior alternative because it avoids or reduces all construction impacts related to transportation, biological resources, cultural resources, noise, and tribal cultural resources. It also avoids or reduces operational impacts related to transportation, aesthetics, cultural resources, and geology and soils.

The Improved Existing Bus Service Alternative would meet some of the Proposed Project's objectives, including enhancing connectivity to Metro and other regional transit services. However, because Alternative 2 would require buses to operate in mixed-flow traffic for the entirety of the route, Metro would not be able to meet the Proposed Project's objectives of advancing a premium transit service that is more competitive with auto travel. Additionally, Alternative 2 would not improve service reliability and regional transit ridership to the same degree that the Proposed Project would, due to slower service as a result of travel in mixed traffic lanes and more frequent stops. For these reasons, Metro finds that the environmentally superior alternative, Alternative 2, inadequately satisfies the objectives of the Proposed Project and is therefore infeasible.

10.5 FINDINGS FOR MITIGATION MEASURES

The Metro Board has considered every mitigation measure recommended in the EIR. Metro hereby binds itself to implement or, as appropriate, require implementation of these measures. These Findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when Metro adopts a resolution approving the Proposed

Project. The mitigation measures are referenced in the MMRP adopted concurrently with these Findings and will be effectuated through the process of constructing and implementing the Proposed Project.

Some comments on the Draft EIR suggested additional mitigation measures and/or modifications to the measures recommended in the Draft EIR. As shown in the Final EIR, Metro modified some of the mitigation measures in response to such comments. In response to other such comments, Metro explained why the suggested mitigation measures were not feasible and/or not superior to the mitigation measures identified in the Draft EIR. The Metro Board commends 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. As discussed in Section 6 of these Findings, with implementation of the mitigation measures set forth in the MMRP, the Proposed Project would not result in any significant and unavoidable impacts.