REVISED
ATTACHMENT B

Findings of Fact

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

Transportation Communication Network Program

November 2022

Metro

TABLE OF CONTENTS

ABBREVIATIONS/ACRONYMS

AB ..... Assembly Bill
ACM ..... Asbestos-containing material
AQMP ..... Air Quality Management Plan
BMPs ..... Best Management Practices
BSA..... Biological Study Area
CAAP ..... Climate Action and Adaptation Plan
CAFE ..... Corporate Average Fuel Economy
CALGreen ..... California Green Building Standards
Caltrans..... California Department of Transportation
CARB ..... California Air Resources Board
CCR ..... California Code of Regulations
CDFW ..... California Department of Fish and Wildlife
CEQA..... California Environmental Quality Act
City..... City of Los Angeles
CO..... Carbon Monoxide
COC ..... Chemicals of Concern
County..... Los Angeles County
EIR ..... Environmental Impact Report
ESA..... Environmentally Sensitive Area
FF..... Freeway-Facing
FTA ..... Federal Transit Administration
General Plan ..... City of Los Angeles General Plan
GHG..... Greenhouse Gases
HASP ..... Health and Safety Plan
LADBS ..... Los Angeles Department of Building and Safety
LADOT ..... Los Angeles Department of Transportation
LADWP ..... Los Angeles Department of Water and Power
LAMC ..... Los Angeles Municipal Code
LBP ..... Lead-Based Paint
LED ..... Light-Emitting Diode
Metro ..... Los Angeles County Metropolitan Transportation Authority
Mobility Plan..... Mobility Plan 2035
MRDC ..... Metro Rail Design Criteria
MMRP ..... Mitigation Monitoring and Reporting Program
NAHC..... Native American Heritage Commission
OHP ..... Office of Historic Preservation
PAHs..... Polynuclear Aromatic Hydrocarbons
PCE..... Percholroethylene
PM2.5..... Fine Particulate Matter ≤ 2.5 Microns
PM10..... Particulate Matter ≤ 10 Microns
PPE..... Personal Protective Equipment

ppm ..... Parts Per Million
PQS ..... Professional Qualifications Standards
PRC ..... Public Resources Code
RIITS..... Regional Integration of Intelligent Transportation Systems
RTP/SCS ..... Regional Transportation Plan/Sustainable Communities Strategy
RWQCBs ..... Regional Water Quality Control Boards
SB ..... Senate Bill
SCAG..... Southern California Association of Governments
SCAQMD ..... South Coast Air Quality Management District
SHPO..... State Historic Preservation Officer
SLs..... Screening Levels
SMP ..... Soil Management Plan
SOI..... Secretary of the Interior
State..... State of California
SWCA ..... SWCA Environmental Consultants
TAC..... Toxic Air Contaminant
TCE..... Tetrachloroethylene
TCN..... Transportation Communication Network
TCR MMP ..... Tribal Cultural Resource Mitigation and Monitoring Program
TPHd..... Total Petroleum Hydrocarbons as Diesel
TPHg..... Total Petroleum Hydrocarbons as Gasoline
TPHo..... Total Petroleum Hydrocarbons as Oil
U.S. ..... United States
USACE..... United States Army Corp of Engineers
USFWS ..... United States Fish and Wildlife Service
UST..... Underground Storage Tank
Vision Plan..... Metro 2028 Vision Plan
VMT ..... Vehicle Miles Traveled
VOC ..... Volatile Organic Compound
WEAP ..... Worker Environmental Awareness Program
WOS .....Waters of the State

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 proposed Transportation Communication Network (TCN) Program (Project or TCN Program) would result in significant unavoidable impacts related to aesthetics, cultural resources, and land use and planning, and no feasible mitigation measures were identified to mitigate these impacts. 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 IV. MMRP of the Final Environmental Impact Report (EIR) and is provided as a part of these findings as Attachment B to the [Month] 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 Project.

In accordance with the CEQA Guidelines, Metro adopts these findings as part of the approval of the 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 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 Project and its objectives

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

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

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

Section 7. Environmental impacts that are less than significant

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

Section 9. Potential cumulative impacts

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

Section 11. Statement of Overriding Considerations

3. PROJECT DESCRIPTION AND OBJECTIVES

The Project would provide a network of structures with digital displays (TCN Structures) that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles (City). The specific objectives of the project are:

- Incorporate features for real-time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services.

- Geographically space the multifunctional TCN Structures to expand Metro's transportation public messaging network and ability to broadcast information to commuters in a variety of ways to further increase Metro's visibility and accessibility for all commuters.

- Improve public safety by notifying the public of roadway improvements, road hazards, Earthquake Early Warning System notifications, Amber Alerts, and emergency situations.

- Maximize efficiency of the congested road network by promoting public awareness of travel alternatives based on geography and time constraints such as alternative routes, carpooling alternatives, and public transportation opportunities.

- Maximize advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would further Goal 2 of the Metro Vision 2028 Strategic Plan, by creating a funding source for programs to enhance experiences for all Metro users such as improving security and increasing customer satisfaction.

- Implement Goal 4 of the Metro Vision 2028 Strategic Plan by creating an avenue for regional collaboration and comprehensive, timely, and real-time information sharing across government agencies to regionally improve traffic and transportation systems.

- Reduce overall square footage of existing static off-premise displays within the City of Los Angeles.

- Locate the TCN Structures at sites, elevations, and angles that would not increase distraction to motorists while still efficiently relaying information to commuters.

As discussed in Section II, Project Description, of the Draft EIR, and shown in Tables 1 and 2 below, implementation of the Project would include the installation of up to 34 Freeway-Facing TCN Structures and 22 Non-Freeway Facing TCN Structures on Metro-owned property. The total amount of TCN Structure digital signage would be a maximum of approximately 55,000 square feet. The TCN Program would also include the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing off-premise static displays within the City. The new TCN Structures would use intelligent technology to improve roadway efficiency and increase public safety and communication, while also generating advertising revenue for both Metro and the City.

The TCN Structures would be equipped with Metro's Regional Integration of Intelligent Transportation Systems (RIITS), which provides comprehensive real-time information among freeway, traffic, transit, and emergency systems and across various agencies. This information would be used to improve traffic and transportation systems and to disseminate information regarding roadway improvements and emergency events. Further, the TCN Structures may include live video and security feeds to supplement Caltrans' limited number of existing cameras on the freeway and street corridors for public safety. All information received from these additional cameras would only be used for mass traffic data, and no personal or private information would be collected or used. Additionally, the TCN Program would be designed to support future innovations such as autonomous vehicles, smart energy grids, and high-speed wireless cameras.

The TCN Structures would increase roadway efficiency by aiding traffic signal timing, micro-transit data, and Metro vanpool on-demand services. It would also improve the experience of bus passengers by facilitating transit signal priority, boosting bus wi-fi, and relaying accurate bus arrival time information. Finally, the TCN Program would enable data collection during large events in the City, to minimize congestion and provide parking information.

The TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. The TCN Structures would follow Metro's Advertising Content Guidelines. Off-site advertising would include information related to a business, commodity, industry or other activity which is sold, offered or conducted elsewhere than on the premises upon which the TCN Structure is located.

As part of the Project, the City would need to amend its sign regulations in Chapter I of the Los Angeles Municipal Code (the Zoning Code) to create a mechanism for reviewing and approving the TCN Structures (Zoning Ordinance) and the static display removals. The Zoning Ordinance, and other potential associated Zoning Code and General and/or Specific Plan amendments, would create a new class of signage for the TCN Structures given their unique attributes and intelligent technology.

Tables 1 and 2 below describe the Site Locations for freeway facing TCN structures, and non-freeway facing TCN structures, respectively.

Table 1
Freeway Facing TCN Structure Locations

Sign ID	Map No.	Location	Assessor's Parcel Number	sf per Digital Display (No. of Digital Display Faces per TCN Structure)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
FF-1	3	US-101 North Lanes at Union Station	5409023941	1,200 (1)	30	40	40
FF-2	3	US-101 South Lanes at Center Street	5173019901	672 (2)	14	48	72
FF-3	3	US-101 North Lanes at Keller Street	5409021902	672 (2)	14	48	72
FF-4	3	US-101 South Lanes at Beaudry Street	5160024904	672 (2)	14	48	75
FF-5	1	US-101 North Lanes, Northwest of Lankershim Boulevard	2423038970	672 (2)	14	48	65
FF-6	3	I-5 South Lanes at North Avenue 19	5415002903	672 (2)	14	48	85
FF-7	3	I-5 North Lanes at San Fernando Road	5445007903	672 (2)	14	48	85
FF-8	3	I-5 South Lanes and Exit Ramp to I-10	5410009901	672 (2)	14	48	85
FF-9	3	I-10 West Lanes (Bus Yard)	5410009901	672 (2)	14	48	50
FF-10	3	I-10 West Lanes and Entrance Ramp from I-5	5170010901	672 (2)	14	48	95
FF-11	3	I-10 East Lanes and Exit Ramp to SR-60 and I-5	5170010901	672 (2)	14	48	95
FF-12	3	I-10 West Lanes at Griffin Avenue and East 16th Street	5132029905	672 (2)	14	48	80
FF-13	1	SR-2 South Lanes Northeast of Casitas Avenue	5436033906	672 (2)	14	48	85
FF-14	1	SR-2 North Lanes Northeast of Casitas Avenue	5442001900	672 (2)	14	48	85
FF-15	1	SR-170 South Lanes at Raymer Street	2324002901	672 (1)	14	48	40
FF-16	1	SR-170 North Lanes North of Sherman Way	2307021901	672 (1)	14	48	40
FF-17	1	I-5 North Lanes South of Tuxford Street	2408038900	672 (2)	14	48	85
FF-18	1	I-5 South Lanes South of Tuxford Street	2632001901	672 (2)	14	48	85
FF-19	1	SR-118 East of San Fernando Road	2523001900	672 (2)	14	48	80

Sign ID	Map No.	Location	Assessor's Parcel Number	sf per Digital Display (No. of Digital Display Faces per TCN Structure)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
FF-20	1	SR-118 East of San Fernando Road	2523001900	672 (2)	14	48	80
FF-21	2	I-110 South Lanes at Exposition Boulevard	5037030902	672 (2)	14	48	80
FF-22	1	I-5 North Lanes at San Fernando Road	2603001901	672 (2)	14	48	65
FF-23	2	I-110 North Lanes at Exposition Boulevard	5122024909	672 (2)	14	48	80
FF-24	1	I-5 South Lanes at San Fernando Road and Sepulveda Boulevard	2605001915	672 (2)	14	48	95
FF-25	1	I-405 South Lanes at Victory Boulevard	2251002905	672 (2)	14	48	80
FF-26	2	I-405 North Lanes at Exposition Boulevard	4256010902	672 (2)	14	48	95
FF-27	2	I-405 South Lanes at Exposition Boulevard	4260039906	672 (1)	14	48	95
FF-28	2	I-10 West at Robertson Boulevard	4313024906	672 (1)	14	48	80
FF-29	2	SR-90 East at Culver Boulevard	4211007907	672 (2)	14	48	80
FF-30	2	SR-90 West at Culver Boulevard	4223009906	672 (2)	14	48	80
FF-31	2	I-105 West Lanes at Aviation Boulevard	4129028901	672 (2)	14	48	95
FF-32	2	I-105 East Lanes at Aviation Boulevard	4138001902	672 (2)	14	48	95
FF-33	2	I-110 South Lanes at Slauson Avenue	5001037907	672 (1)	14	48	80
FF-34	2	I-110 North Lanes at Slauson Avenue	5101040900	672 (2)	14	48	80

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sf = square feet

ft = feet

Source: Eyestone Environmental, 2022.

Table 2
Non-Freeway Facing TCN Structure Locations

Sign ID	Map No.	Location	Assessor Parcel Number	sf per Digital Display (No. of Digital Display Faces per TCN Structure)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
NFF-1	1	Northeast corner of Vermont Avenue and Sunset Boulevard	5542015900	300 (2)	10	30	30
NFF-2	3	Spring Street Bridge, 326 feet North of Aurora Street	5409002900	300 (2)	10	30	65
NFF-3	1	Northwest corner of Lankershim Boulevard and Chandler Boulevard	2350016906	300 (1)	10	30	30
NFF-4	1	Northwest corner of Lankershim Boulevard and Universal Hollywood Drive	2423036919	300 (1)	10	30	30
NFF-5	1	Southwest corner of Lankershim Boulevard and Universal Hollywood Drive	2423036919	300 (1)	10	30	30
NFF-6	3	Southwest corner of 4th Street and Hill Street	5149015902	300 (1)	10	30	30
NFF-7	2	Venice Boulevard, 240 feet West of Robertson Boulevard	4313024909	300 (1)	10	30	30
NFF-8	3	Southeast corner of Alameda Street and Commercial Street	5173001901	672 (2)	14	48	60
NFF-9	1	Northeast corner of Van Nuys Boulevard and Orange Line Busline	2240008905	300 (2)	10	30	30
NFF-10	1	Southeast corner of Sepulveda Boulevard and Erwin Street	2242001904	300 (1)	10	30	30
NFF-11	2	Southwest of Crenshaw Boulevard, 175 feet South of 67th Street	4006025900	300 (1)	10	30	30
NFF-12	2	Southeast corner of Crenshaw Boulevard and Exposition Boulevard	5044002900	300 (2)	10	30	30
NFF-13	3	Southeast corner of East Cesar Chavez Avenue and North Vignes Street	5409023941	300 (2)	10	30	30
NFF-14	2	Pico Boulevard and Exposition Boulevard, South of rail	4260025902	300 (1)	10	30	30
NFF-15	2	Pico Boulevard, 445 feet West of Sawtelle Boulevard	4260039906	300 (1)	10	30	30
NFF-16	3	Southeast corner of South Central Avenue and East 1st Street	5161018903	300 (2)	10	30	30

Sign ID	Map No.	Location	Assessor Parcel Number	sf per Digital Display (No. of Digital Display Faces per TCN Structure)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
NFF-17	2	Century Boulevard, 152 feet West of Aviation Boulevard	4125026904	672 (2)	14	48	80
NFF-18	2	Southwest Aviation Boulevard and South of Arbor Vitae Street	4125020907	672 (2)	14	48	30
NFF-19	2	Northwest corner of Vermont Avenue and Beverly Boulevard	5520019900	300 (2)	10	30	30
NFF-20	2	Southwest corner of Santa Monica Boulevard and Vermont Avenue	5538022903	300 (2)	10	30	30
NFF-21	3	South of 4th Street 210 feet East of South Santa Fe Avenue	5163017900	300 (2)	10	30	65
NFF-22	3	Northwest corner of East 7th Street and South Alameda Street	5147035904	300 (2)	10	30	30

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sf = square feet

ft = feet

Source: Eyestone Environmental, 2022.

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 an EIR has been certified which identifies one or more significant environmental effects of the Project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. [CEQA Finding 1]
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been

adopted by such other agency or can and should be adopted by such other agency. [CEQA Finding 2]

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

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

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

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

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

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

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to avoid or mitigate significant environmental impacts that would otherwise occur with implementation of the Project.[1]

For those significant impacts that cannot be mitigated to less-than-significant levels, the lead agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the Project outweigh the significant impacts on the environment.[2] CEQA Guidelines Section 15093(a) states that, "If the specific economic, legal, social, technological, or other benefits of a Project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" If the adverse environmental effects are considered acceptable the lead agency is required to prepare a Statement of Overriding Considerations.

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

4.1 RECORD OF PROCEEDINGS

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

- Notice of Preparation and other public notices issued by Metro in conjunction with the Project;
- The Draft EIR dated September 2022, including all associated appendices and documents that were incorporated by reference;
- All testimony, documentary evidence, and all correspondence submitted in response to the Project during the scoping meetings or by agencies or members of the public during the public comment period on the Draft EIR, and responses to those comments (Chapter II, Responses to Comments, of the Final EIR);
- The Final EIR dated November 2022 including all associated appendices and documents that were incorporated by reference;
- The MMRP (Chapter IV of the Final EIR);
- All findings and resolutions adopted by Metro in connection with the Project, and all documents cited or referred to therein;
- All final technical reports and addenda, studies, memoranda, maps, correspondence, and all planning documents prepared by Metro or the consultants relating to the Project;
- All documents submitted to Metro by agencies or members of the public in connection with development of the Project;
- All actions of Metro with respect to the Project; 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 AND UNAVOIDABLE

Metro finds that, based upon substantial evidence in the record, as discussed below, the following impacts associated with the Project would be significant and unavoidable.

5.1 AESTHETICS

As discussed in Section IV.A of the Draft EIR, the Project would have significant impacts related to aesthetics with respect to the following significance thresholds:

- Have a substantial adverse effect on a scenic vista; and

- In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). In an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.

Impacts. *Scenic Vistas:* As discussed more fully in Section IV.A, Aesthetics, Section IV.D, Cultural Resources, and Section VI, Other CEQA Considerations, of the Draft EIR, most of the TCN Structures would not have significant impacts on scenic vistas. However, the Project would include four TCN Structures (at Site Locations NFF-2, NFF-3, NFF-16, and NFF-21) that would be in close proximity to five historical resources (the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044)). While these TCN Structures would not physically impact these historical resources, they would impede visibility of and thus detract from the character defining features of these five historical resources. Although these historical resources are located within urban areas where public views of these historical resources are affected by existing infrastructure and buildings, the proposed TCN Structures would further contribute to the urban visual components surrounding the historical resources. As such, the Project would result in a substantial adverse effect on a scenic vista, and this impact would be significant.

References. Section IV.A, Aesthetics, of the Draft EIR, pages IV.A-28 through IV.A-48. Section IV.D, Cultural Resources, of the Draft EIR, pages IV.D-32 through IV.D-64. Section VI, Other CEQA Considerations, of the Draft EIR, pages VI-1 through VI-3.

Mitigation Measures.

While Metro considered potential modifications to the size and height of the TCN Structures to mitigate this aesthetic impact, it determined that such modifications would not materially reduce this impact. Thus, no feasible mitigation measures have been identified to mitigate this impact.

Finding. For the reasons stated above and in the Draft EIR, Metro finds that impacts to aesthetic resources related to scenic vistas would be significant. No feasible mitigation measures exist to mitigate these impacts. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines.

Impact. *Existing Visual Character and Quality of Public Views:* Most TCN Structures would not significantly impact visual character or public views. As discussed above, however, the TCN Structures at Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 would detract from the character defining features of five historical resources. Thus, the Project would have significant impacts on the existing visual character and quality of public views in the vicinity of those historical resources.

References. Section IV.A, Aesthetics, of the Draft EIR, pages IV.A-28 through IV.A-48. Section IV.D, Cultural Resources, of the Draft EIR, pages IV.D-32 through IV.D-64. Section VI, Other CEQA Considerations, of the Draft EIR, pages VI-1 through VI-3.

Mitigation Measures.

While Metro considered potential modifications to the size and height of the TCN Structures to mitigate these aesthetic impacts, it determined that such modifications would not materially reduce the impacts. Thus, no feasible mitigation measures have been identified to mitigate these impacts.

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these impacts to aesthetic resources related to visual character and quality of public views would be significant. No feasible mitigation measures exist to mitigate the impacts. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines.

Impact. *Conflicts with Plans, Policies, and Regulations Governing Scenic Quality:* Most of the TCN Structures would not conflict with plans, policies, and regulations governing scenic quality. However, as discussed in Section IV.A, Aesthetics, Section VI, Other CEQA Considerations, and Appendix I, Land Use, of the Draft EIR, Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 would be inconsistent with several goals and policies of the Central City North, Central City, and North Hollywood–Valley Villa Community Plans regarding historical resources and associated visual impacts. In addition, the Project would also be inconsistent with Palms–Mar Vista–Dey Community Plan policies regarding placement of off-site premises signs within the coastal area (relative to Site Locations FF-29 and FF-30). Thus, the project conflicts with applicable plans, policies, and regulations governing scenic quality, and this impact would be significant.

References. Section IV.A, Aesthetics, of the Draft EIR, pages IV.A-28 through IV.A-48. Section IV.D, Cultural Resources, of the Draft EIR, pages IV.D-32 through IV.D-64. Section VI, Other CEQA Considerations, of the Draft EIR, pages VI-1 through VI-3. Appendix I, Land Use, to the Draft EIR, pages 21–50.

Mitigation Measures.

While Metro considered potential modifications to the size and height of the TCN Structures to mitigate these aesthetic impacts, it determined that such modifications would not materially reduce the impacts. Thus, no feasible mitigation measures have been identified to mitigate these impacts.

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these impacts to aesthetic resources related to conflicts with plans, policies, and regulations governing scenic quality would be significant. No feasible mitigation measures exist to mitigate these impacts. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines.

5.2 CULTURAL RESOURCES

As discussed in Section IV.D of the Draft EIR, the Project would have significant impacts related to cultural resources with respect to the following significance threshold:

- Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.

Impact. *Historical Resources:* As discussed above and in Section IV.D, Cultural Resources, and Section VI, Other CEQA Considerations, of the Draft EIR, most of the TCN Structures would not significantly impact historical resources; however, the Project would result in visual impacts to five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), the Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044). Such impacts are specifically associated with Site Locations NFF-2, NFF-3 NFF-16, and NFF-21. These Site Locations are within immediate proximity of these historical resources, and the Project would likely result in permanent and unavoidable visual impacts by fundamentally affecting the integrity of setting and feeling. Although these historical resources are within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, the TCN Structures at these Site Locations would likely detract from the character-defining features and affect the viewsheds of the resources. As such, these impacts to historical resources would be significant.

References. Section IV.D, Cultural Resources, of the Draft EIR, pages IV.D-32 through IV.D-64. Section VI, Other CEQA Considerations, of the Draft EIR, pages VI-2 through VI-3.

Mitigation Measures.

While Metro considered potential modifications to the size and height of the TCN Structures to mitigate the cultural impacts to historical resources, it determined that such modifications would not materially reduce the impacts. Thus, no feasible mitigation measures have been identified to mitigate these impacts.

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these impacts to cultural resources related to historical resources would be significant. No feasible mitigation measures exist to mitigate these impacts. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines.

5.3 LAND USE AND PLANNING

As discussed in Section IV.I of the Draft EIR, the Project would have significant impacts related to land use and planning with respect to the following significance threshold:

- Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Impacts. As discussed more fully in Section IV.I, Land Use and Planning, and Section VI, Other CEQA Considerations, of the Draft EIR, the Project would not conflict with most of the goals, policies, and objectives in state, regional, and local plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would not overall conflict with environmental policies of or impede implementation of the Coastal Act, SCAG's 2020-2045

RTP/SCS, Metro's Vision Plan, the Mobility Plan and most of the policies set forth in the General Plan, including the Community Plans. However, the Project would conflict with a few goals and policies related to historical and aesthetic resources associated with Site Locations NFF-2. NFF-3, NFF-16 and NFF-21 in the Central City North, Central City, North Hollywood–Valley Village Community Plans, as well as the General Plan's Conservation Element policies related to historical resources. In addition, the Project would conflict with the Palms–Mar Vista–Del Rey Community Plan policy regarding placement of off-site advertising within coastal areas due to Site Locations FF-29 and FF-30. As such, these impacts related to conflicts with applicable plans, policies, and regulations would be significant.

References. Section IV.I, Land Use and Planning, of the Draft EIR, pages IV.I-13 through IV.I-26. Section VI, Other CEQA Considerations, of the Draft EIR, page VI-3.

Mitigation Measures.

Review of potential measures such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Thus, there are no feasible measures that would mitigate these impacts to less-than-significant levels.

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these impacts to land use and planning would be significant. No feasible mitigation measures exist to mitigate these impacts. Thus, Metro adopts CEQA Finding 3, as identified in Section 4 above and in Section 15091(a)(3) of the CEQA Guidelines.

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

Metro finds that, based upon substantial evidence in the record, as discussed below, the following impacts associated with the Project are potentially significant, but can be reduced to less-than-significant levels 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 Project.

6.1 BIOLOGICAL RESOURCES

As discussed in Section IV.C of the Draft EIR, the Project would result in potentially significant impacts 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;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; 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. *Candidate, Sensitive, and Special Status Species:* As discussed more fully in Section IV.C of the Draft EIR, the Project has the potential to impact 14 special-status wildlife species and 5 special-status plant species through construction activities, habitat removal, and the addition of new TCN structures within suitable habitat areas. To minimize these impacts to a less-than-significant level, Mitigation Measures **BIO-MM-1** through **BIO-MM-4**, set forth below, would be implemented.

Reference. Section IV.C, Biological Resources, of the Draft EIR, pages IV.C-23 through IV.C-39.

Mitigation Measures

BIO-MM-1: **Implement Biological Resource Protection Measures during Construction (All Site Locations and takedown locations of existing static displays).** The following BMPs shall be implemented during construction to minimize direct and indirect impacts on biological resources and special-status species:

- Prior to the commencement of construction, a Project biologist (a person with, at minimum, a bachelor's degree in biology, ecology, or a related environmental science; greater than five years of experience and knowledge of natural history, habitat affinities, and id of flora and fauna species; and knowledge of all relevant federal, state, and local laws governing biological resources, including CDFW qualifications for field surveyors)) shall be designated to be responsible for overseeing compliance with protective measures for biological resources during vegetation clearing and work activities within and adjacent to areas of native habitat. The Project biologist will be familiar with the local habitats, plants, and wildlife and maintain communications with the contractor on issues relating to biological resources and compliance with applicable environmental requirements. The Project biologist may designate other qualified biologists or biological monitors to help oversee Project compliance or conduct preconstruction surveys

for special-status species. These biologists will have familiarity with the species for which they would be conducting preconstruction surveys or monitoring construction activities.

- The Project biologist or designated qualified biologist shall review final plans; designate areas that need temporary fencing (e.g., ESA fencing); and monitor construction activities within and adjacent to areas with native vegetation communities, regulated aquatic features, or special-status plant and wildlife species. The qualified biologist shall monitor compliance with applicable environmental requirements during construction activities within designated areas during critical times, such as initial ground-disturbing activities (fencing to protect native species). The qualified biologist shall check construction barriers or exclusion fencing and provide corrective measures to the contractor to ensure the barriers or fencing are maintained throughout construction. The qualified biologist shall have the authority to stop work if a federally or state-listed species is encountered within the Project footprint during construction. Construction activities shall cease until the Project biologist or qualified biologist determines that the animal will not be harmed or that it has left the construction area on its own. The Project biologist shall notify Metro, and Metro shall notify the appropriate regulatory agency within 24 hours of sighting of a federally or State-listed species.
- Prior to the start of construction, all Project personnel and contractors who will be on the Site Locations during construction shall complete mandatory training conducted by the Project biologist or a designated qualified biologist. Any new Project personnel or contractors that start after the initiation of construction shall also be required to complete the mandatory Worker Environmental Awareness Program training before they commence with work. The training shall advise workers of potential impacts on special-status vegetation communities and special-status species and the potential penalties for impacts on such vegetation communities and species. At a minimum, the training shall include the following topics: (1) occurrences of special-status species and special-status vegetation communities within the Site Location footprints (including vegetation communities subject to USACE, CDFW, and RWQCB jurisdiction); (2) the purpose for resource protection; (3) sensitivity of special-status species to human activities; (4) protective measures to be implemented in the field, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced areas to avoid special-status resource areas in the field (i.e., avoided areas delineated on maps or in the BSA by fencing); (5) environmentally responsible construction practices; (6) the protocol to resolve conflicts that may arise at any time during the construction process; (7) reporting requirements and procedures to follow should a special-status species be encountered during construction; and (8) Avoidance Measures designed to reduce the impacts on special-status species.

- The training program will include color photos of special-status species and special-status vegetation communities. Following the education program, the photos will be made available to the contractor. Photos of the habitat in which special-status species are found will be posted on site. The contractor shall provide Metro with evidence of the employee training (e.g., a sign-in sheet) on request. Project personnel and contractors shall be instructed to immediately notify the Project biologist or designated biologist of any incidents that could affect special-status vegetation communities or special-status species. Incidents could include fuel leaks or injury to any wildlife. The Project biologist shall notify Metro of any incident, and Metro shall notify the appropriate regulatory agency.
- The Project biologist shall conduct a preconstruction survey for special-status species within the Project footprint prior to vegetation clearing, and/or ground disturbance. Any wildlife encountered will be encouraged to leave the Site Location footprint or relocated outside of the Site Location footprint if feasible.
- The Project biologist shall request that the contractor halt work, if necessary, and confer with Metro prior to contacting the appropriate regulatory agencies to ensure the proper implementation of species and habitat protection measures. The Project biologist shall report any noncompliance issue to Metro, and Metro will notify the appropriate regulatory agencies.
- The Project biologist shall inspect the Site Location footprint immediately prior to, and during, construction to identify the presence of invasive weeds and recommend measures to avoid their inadvertent spread in association with the Project. Such measures may include inspection and cleaning of construction equipment and use of eradication strategies.
- ESA fencing shall be placed along the perimeter of the Site Location footprint, where necessary, to prevent inadvertent intrusions into habitat identified as ESA. Work areas will be clearly marked in the field and confirmed by the Project biologist or designated biologist prior to any clearing, and the marked boundaries will be maintained throughout the duration of the work. Staging areas, including lay down areas and equipment storage areas, will be flagged and fenced with ESA fencing (e.g., orange plastic snow fence, orange silt fencing). Fences and flagging will be installed by the contractor in a manner that does not impact habitats to be avoided and such that it is clearly visible to personnel on foot and operating heavy equipment. If work occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of Metro.
- No work activities, materials or equipment storage, or access shall be permitted outside the Site Location footprint without permission from Metro. All parking and equipment storage used by the contractor related to the Project shall be confined to the Site Location footprint and established paved areas. Undisturbed areas and

special-status vegetation communities outside and adjacent to the Site Location footprint shall not be used for parking or equipment storage. Project-related vehicle traffic shall be restricted to the Site Location footprint and established roads and construction access points.

- The contractor shall be required to conduct vehicle refueling and maintenance in upland areas where fuel cannot enter waters of the U.S. or WOS waters of the State and areas that do not have suitable habitat to support federally and/or state-listed species. Equipment and containers shall be inspected daily for leaks. Should a leak occur, contaminated soils and surfaces shall be cleaned up and disposed of in accordance with applicable local, State, and federal requirements.

BIO-MM-2: **Avoid Impacts on Migratory and Nesting Birds (All Site Locations and takedown locations of existing static displays)** If construction activities occur between January 15 and September 15, a preconstruction nesting bird survey (within seven days prior to construction activities) shall be conducted by a qualified biologist to determine if active nests are present within the area proposed for disturbance in order to avoid the nesting activities of breeding birds by establishing a buffer until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW. The results of the surveys shall be submitted to Metro (and made available to the wildlife agencies [USFWS/CDFW], upon request) prior to initiation of any construction activities.

BIO-MM-3: **Avoid impacts on Least Bell's Vireo, if present (Applicable to Site Locations FF-29 and FF-30)** Suitable habitat for Least Bell's Vireo shall be removed outside of the nesting season (March 15 through September 30), between October 1 and March 14. Should habitat for Least Bell's Vireo require removal between March 15 and September 30, or construction activities are initiated during this time, preconstruction surveys consisting of three separate surveys no more than seven days prior to vegetation removal shall be conducted by a qualified biologist. Should Least Bell's Vireo be detected within 500 feet of the Site Location, construction activities shall be halted unless authorization has been obtained from USFWS.

BIO-MM-4: **Avoid Potential Impacts on Special-Status Bats (All Site Locations and take down locations of static displays)** A qualified bat biologist shall conduct a preconstruction survey for potential bat habitat within the take down area of the static display or Site Location footprint prior to vegetation clearing, and/or ground disturbance for take down locations and all Site Locations. If suitable habitat is not found, then no further action is required.

If suitable habitat is determined to be present:

- A qualified bat biologist shall survey potentially suitable structures and vegetation during bat maternity season (May 1st through October 1st), prior to construction, to assess the potential for the structures' and vegetation's use for bat roosting and

bat maternity roosting, as maternity roosts are generally formed in spring. The qualified bat biologist shall also perform preconstruction surveys or temporary exclusion within 2 weeks prior to construction during the maternity season, as bat roosts can change seasonally. These surveys will include a combination of structure inspections, exit counts, and acoustic surveys.

- If a roost is detected, a bat management plan shall be prepared if it is determined that Project construction would result in direct impacts on roosting bats. The bat management plan shall be submitted to CDFW for review and approval prior to implementation and include appropriate avoidance and minimization efforts such as:
- Temporary Exclusion. If recommended by the qualified bat biologist, to avoid indirect disturbance of bats while roosting in areas that would be adjacent to construction activities, any portion of a structure deemed by a qualified bat biologist to have potential bat roosting habitat and may be affected by the Project shall have temporary eviction and exclusion devices installed under the supervision of a qualified and permitted bat biologist prior to the initiation of construction activities. Eviction and subsequent exclusion shall be conducted during the fall (September or October) to avoid trapping flightless young bats inside during the summer months or hibernating/overwintering individuals during the winter. Such exclusion efforts are dependent on weather conditions, take a minimum of two weeks to implement, and must be continued to keep the structures free of bats until the completion of construction. All eviction and/or exclusion techniques shall be coordinated between the qualified bat biologist and the appropriate resource agencies (e.g., CDFW) if the structure is occupied by bats. If deemed appropriate, the biologist may recommend installation of temporary bat panels during construction.

If a roost is detected but would only be subject to indirect impacts:

- Daytime Work Hours. All work conducted under the occupied roost shall take place during the day. If this is not feasible, lighting and noise will be directed away from night roosting and foraging areas.

Finding. These potentially significant biological impacts would be mitigated through the use of best practices during construction, seasonally-appropriate surveying and monitoring of potentially impacted species, and techniques to avoid and minimize impacts on biological resources during the Project's construction and operations. For the reasons stated above and as set forth in the Draft EIR, Metro finds that, through implementation of Mitigation Measures **BIO-MM-1** through **BIO-MM-4,** the Project's impacts to biological resources related to candidate, sensitive, and special-status species would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines

Impact. *Riparian Habitat and Other Sensitive Natural Communities:* As discussed more fully in Section IV.C.3 of the Draft EIR, construction activities in two Site Locations could interfere with sensitive vegetation communities. To minimize these impacts to a less-than-significant level, Mitigation Measure **BIO-MM-1**, set forth above, would be implemented

Reference. Section IV.C, Biological Resources, of the Draft EIR, pages IV.C-23 through IV.C-39.

Mitigation Measure

BIO-MM-1: **Implement Biological Resource Protection Measures during Construction** (See above)

Finding. These potentially significant biological impacts would be mitigated through the use of best practices during construction. For the reasons stated above and as set forth in the Draft EIR, Metro finds that, through implementation of Mitigation Measure **BIO-MM-1**, the Project's impacts to biological resources related to riparian habitat and other sensitive natural communities would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Impact. *Wetlands:* As discussed more fully in Section IV.C.3 of the Draft EIR, construction activities in eight site locations could have indirect impacts to downstream aquatic resources if fill or hazardous materials were to spill into nearby waterways. To minimize these impacts to a less-than-significant level, Mitigation Measure **BIO-MM-1**, set forth above, would be implemented.

Reference. Section IV.C, Biological Resources, of the Draft EIR, pages IV.C-23 through IV.C-39.

Mitigation Measure

BIO-MM-1: **Implement Biological Resource Protection Measures during Construction** (See above)

Finding. These potentially significant biological impacts would be mitigated through the use of best practices during construction. For the reasons stated above and as set forth in the Draft EIR, Metro finds that, through implementation of Mitigation Measure **BIO-MM-1**, the Project's impacts to biological resources related to wetlands would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

Impact. *Movement of Wildlife Species, Migratory Corridors, and Wildlife Nursery Sites:* As discussed more fully in Section IV.C of the Draft EIR, static display removal could interfere with bird nesting. Additionally, there could be impacts to wildlife that stray from ordinary migratory

corridors and pass closer to Project construction or operations. To minimize these impacts to a less-than-significant level, Mitigation Measures **BIO-MM-1**, **BIO-MM-2**, and **BIO-MM**-4, set forth above, would be implemented.

Reference. Section IV.C, Biological Resources, of the Draft EIR, pages IV.C-23 through IV.C-39.

Mitigation Measures

BIO-MM-1: **Implement Biological Resource Protection Measures during Construction** (See above)

BIO-MM-2: **Avoid Impacts on Migratory and Nesting Birds** (See above)

BIO-MM-4: **Avoid Potential Impacts on Special-Status Bats** (See above)

Finding. The potentially significant biological impacts would be mitigated through the use of best practices during construction, seasonally-appropriate surveying and monitoring of potentially impacted species, and techniques to avoid and minimize impacts on biological resources during the Project's construction and operations. For the reasons stated above and as set forth in the Draft EIR, Metro finds that, through implementation of Mitigation Measures **BIO-MM-1**, **BIO-MM-2**, and **BIO-MM-4,** the Project's impacts to biological resources related to movement of wildlife species, migratory corridors, and wildlife nursery sites would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines

6.2 CULTURAL RESOURCES

As discussed in Section IV.D of the Draft EIR, the Project would create potentially significant impacts related to cultural resources with respect to the following significance threshold:

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

Impact. *Archaeological Resource:* As discussed more fully in Section IV.D of the Draft EIR, the Project would include excavations to a maximum depth of approximately 50 feet below ground surface. As a result, unknown archaeological resources at the Site Locations could potentially be impacted. Mitigation Measure CUL-MM-1, as set forth below, would be implemented to mitigate these impacts to a less-than-significant level.

Reference. Section IV.D, Cultural Resources, of the Draft EIR, pages IV.D-32 through IV.D-64.

Mitigation Measures

CUL-MM-1: Prior to the start of ground disturbance activities during Project construction, including demolition, digging, trenching, drilling, or a similar activity (Ground

Disturbance Activities), a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Site Locations, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements.

Prior to the commencement of any Ground Disturbance Activities, the archaeological monitor(s) shall provide Worker Environmental Awareness Program (WEAP) training to construction workers involved in Ground Disturbance Activities that provides information on regulatory requirements for the protection of cultural resources. As part of the WEAP training, construction workers shall be informed about proper procedures to follow should a worker discover a cultural resource during Ground Disturbance Activities. In addition, construction workers shall be shown examples of the types of resources that would require notification of the archaeological monitor. The Applicant shall maintain on the Site Locations, for Metro inspection, documentation establishing that the training was completed for all construction workers involved in Ground Disturbance Activities.

The archaeological monitor(s) shall observe all Ground Disturbance Activities on the Site Locations that involve native soils. If Ground Disturbance Activities are occurring simultaneously at multiple Site Locations, the principal archaeologist shall determine if additional monitors are required for other Site Locations where such simultaneous Ground Disturbance Activities are occurring. The on-site archaeological monitoring shall end when the archaeological monitor determines that monitoring is no longer necessary.

Finding. The potential impacts to archaeological resources would be mitigated by requiring a qualified archeologist to oversee construction activities. For the reasons set forth above and in the Draft EIR, Metro finds that, through implementation of Mitigation Measure **CUL-MM-1**, the Project's impacts to cultural resources related to archaeological resources would be mitigated to less-than-significant levels. Because this impact related to cultural resources would be reduced to less-than-significant levels, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.3 GEOLOGY AND SOILS

As discussed in Section IV.F of the Draft EIR, the Project would create potentially significant impacts related to geology and soils with respect to the following significance threshold:

- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact. *Paleontological Resources:* As discussed in Section IV.F of the Draft EIR, the Project would include excavations up to 50 feet below grade in soils that could be conducive to preserving vertebrate fossils. It is possible that paleontological resources may be encountered during grading and drilling operations within the Site Locations. Therefore, potential impacts to unique paleontological resources would be potentially significant. To minimize these impacts to a less-than-significant level, Mitigation Measure **GEO-MM-1**, set forth below, would be implemented.

Reference. Section IV.F, Geology and Soils, of the Draft EIR, page IV.F-46 through IV.F-56.

Mitigation Measure

GEO-MM-1: The services of a Project paleontologist who meets the Society of Vertebrate Paleontology standards (including a graduate degree in paleontology or geology and/or a publication record in peer reviewed journals, with demonstrated competence in the paleontology of California or related topical or geographic areas, and at least two full years of experience as assistant to a Project paleontologist), shall be retained prior to ground disturbance activities associated with Project construction in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan. The Paleontological Resource Mitigation and Treatment Plan shall specify the levels and types of mitigation efforts based on the types and depths of ground disturbance activities and the geologic and paleontological sensitivity of the Site Locations. The Paleontological Resource Mitigation and Treatment Plan shall also include a description of the professional qualifications required of key staff, communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens.

Finding. The potential impacts to paleontological resources would be mitigated by requiring a qualified paleontologist to preemptively develop protocols for reporting and handling any paleontological resources that are discovered during ground disturbance activities. For the reasons stated above and as set forth in the EIR, Metro finds that, through implementation of Mitigation Measure **GEO-MM-1**, the Project's impacts to geology and soils related to paleontological resources 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)(1) of the CEQA Guidelines.

6.4 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section IV.H of the Draft EIR, the Project would result in potentially significant impacts related to hazards and hazardous materials with respect to the following significance thresholds:

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; and
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

Impact. *Release of Hazardous Materials:* As discussed more fully in Section IV.H of the Draft EIR and in the Hazards Report, impacts related to the release of hazardous materials into the environment would be potentially significant. The primary Chemicals of Concern (COCs) likely to be encountered at all sites include Total Petroleum Hydrocarbons as Gasoline (TPHg), Total Petroleum Hydrocarbons as Diesel (TPHd), Total Petroleum Hydrocarbons as Oil (TPHo), arsenic, lead, chromium and polynuclear aromatic hydrocarbons (PAHs). A Soil Management Plan (SMP)/Health and Safety Plan (HASP) will be implemented for all Site Locations during construction activities, as provided below in Mitigation Measure **HAZ-MM-1**. In addition, 19 of the 54 Site Locations were identified as high risk and may contain solvent hydrocarbons (primarily Percholroethylene [PCE]/Tetrachloroethylene [TCE] and breakdown by-products) and gasoline in addition to the primary COCs listed above. Furthermore, four Site Locations are near suspected oil wells and may have Underground Storage Tanks (USTs) on the parcels. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. To mitigate these impacts to a less-than-significant level, Mitigation Measures **HAZ-MM-1** through **HAZ-MM-3**, described below, would be implemented.

References. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49. Appendix H, Hazards Technical Report, to the Draft EIR.

Mitigation Measures

HAZ-MM-1: **(All Site Locations):** Soil Management Plan (SMP)—The Project Applicant shall implement an SMP, which shall be submitted to the Metro Capital Engineering Group and/or City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The Site Locations shall be subject to the general protocols described in the SMP regarding prudent precautions and general observations and evaluations of soil conditions to be implemented throughout grading, excavation, or other soil disturbance activities on the Site Locations.

The protocols in the SMP shall include, but not be limited to, the following:

- Special precautions shall be taken to manage soils that will be disturbed during Project earthwork activities in areas containing Chemicals of Concern (COCs) above screening levels (SLs).

- The following requirements and precautionary actions shall be implemented when disturbing soil at the Site Locations: no soil disturbance or excavation activities shall occur without a Project-specific Health and Safety Plan (HASP). Any soil that is disturbed, excavated, or trenched due to on-site construction activities shall be handled in accordance with applicable local, state, and federal regulations. Prior to the re-use of the excavated soil or the disposal of any soil from the Site Locations, the requirements and guidelines in the SMP shall be implemented. The General Contractor shall conduct, or have its designated subcontractor conduct, visual screening of soil during activities that include soil disturbance. If the General Contractor or subcontractor(s) encounter any soil that is stained or odorous (Suspect Soil), the General Contractor and subcontractor(s) shall immediately stop work and take measures to not further disturb the soils (e.g., cover suspect soil with plastic sheeting) and inform the Metro's representative and the environmental monitor. The environmental monitor, an experienced professional trained in the practice of the evaluation and screening of soil for potential impacts working under the direction of a licensed Geologist or Engineer, shall be identified by Metro prior to the beginning of work.
- Prior to excavation activities, the General Contractor or designated subcontractor shall establish specific areas for stockpiling Suspect Soil, should it be encountered, to control contact by workers and dispersal into the environment, per the provisions provided in the SMP.
- The General Contractor shall ensure that on-site construction personnel comply with all applicable federal, state, and local regulations, as well as the State of California Construction Safety Orders (Title 8). Additionally, if Suspect Soil is expected to be encountered, personnel working in that area shall comply with California Occupational Safety and Health Administration regulations specified in CCR Title 8, Section 5192. The General Contractor shall prepare a Project-specific HASP. It is the responsibility of the General Contractor to review available information regarding Site Location conditions, including the SMP, and potential health and safety concerns in the planned area of work. The HASP should specify COC action levels for construction workers and appropriate levels of personal protective equipment (PPE), as well as monitoring criteria for increasing the level of PPE. The General Contractor and each subcontractor shall require its employees who may directly contact Suspect Soil to perform all activities in accordance with the General Contractor and subcontractor's HASP. If Suspect Soil is encountered, to minimize the exposure of other workers to potential contaminants on the Site Location, the General Contractor or designated subcontractor may erect temporary fencing around excavation areas with appropriate signage as necessary to restrict access and to warn unauthorized on-site personnel not to enter the fenced area.
- The General Contractor shall implement the following measures as provided in the SMP to protect human health and the environment during construction activities involving contact with soils at the Site Location: decontamination of construction and transportation equipment; dust control measures; storm water pollution controls and best management practices; and proper procedures for the handling, storage, sampling, transport and disposal of waste and debris.

- The excavated soil should be screened using a calibrated hand-held PID to test for VOCs and methane as necessary.
- In the event volatile organic compound (VOC)-contaminated soil is encountered during excavation on-site, a South Coast Air Quality Management District (SCAQMD) Rule 1166 permit shall be obtained before resuming excavation. Rule 1166 defines VOC-contaminated soil as a soil which registers a concentration of 50 ppm or greater of VOCs as measured before suppression materials have been applied and at a distance of no more than three inches from the surface of the excavated soil with an organic vapor analyzer calibrated with hexane. Notifications, monitoring, and reporting related to the SCAQMD Rule 1166 permit shall be the responsibility of the General Contractor. Protection of on-site construction workers shall be accomplished by the development and implementation of the HASP.
- Known below-grade structures at the Site Locations (i.e., storm water infrastructure) shall be removed from the ground or cleaned, backfilled, and left in place as appropriate during grading and excavation. If unknown below-grade structures are encountered during Site Location excavation, the General Contractor shall promptly notify the Metro's representative the same day the structure is discovered. Based on an evaluation of the unknown below-grade structure by the appropriate professional (e.g., environmental monitor, geotechnical engineer), Metro shall address the below-grade structure in accordance with applicable laws and regulations.
- A geophysical investigation shall be conducted at the Site Locations to clear the construction area of buried utilities

HAZ-MM-2: **(Site Locations FF-1, FF-2, FF-3, FF-4, FF-5, FF-6, FF-13, FF-14, FF-29, FF-30, NFF-1, NFF-2, NFF-3, NFF-8, NFF-12, NFF-13, NFF-18, NFF-19, and NFF-21):** Soil/vapor sampling and testing of soil samples shall be obtained during the site location-specific, design-level geologic and geotechnical investigation. Results of the testing would be submitted and approved by the Metro Capital Engineering Group and/or the Los Angeles Department of Building and Safety (LADBS).

HAZ-MM-3: **(Site Locations FF-4, NFF-3, NFF-18, and NFF-21):** A geophysical investigation shall be conducted to clear the construction area of buried utilities and to identify buried substructures, specifically oil wells and USTs. Results of the geophysical investigation shall be submitted to and approved by the Metro Capital Engineering Group and/or LADBS.

Finding. The potential impacts related to hazards and hazardous materials described above would be mitigated by requiring compliance with site-specific Soil Management Plans, and where necessary, conducting additional testing and investigations at high-risk Site Locations and Site Locations near suspect oil wells. For the reasons set out above and in the Draft EIR, Metro finds that, through implementation of Mitigation Measures **HAZ-MM-1** through **HAZ-MM-3**, the Project's hazards and hazardous materials impacts related to release of hazardous materials would be reduced to less-than-significant levels. For each of these impacts, Metro

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

Impact. *Hazards Near Schools:* As discussed in Section IV.H of the Draft EIR, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City, some of which would be within 0.25 mile of a school. Although the Project would involve the use of hazardous materials common to urban construction projects and TCN Structure operations, all activities involving the handling, use, storage, transport, and disposal of hazardous materials and wastes would occur in compliance with applicable federal, state, and local requirements. In addition, as discussed above, if construction activities uncover hazardous conditions that have the potential to result in risk of upset, Mitigation Measures **HAZ-MM-1** through **HAZ-MM-3**, described above, would be implemented, which would reduce such impacts to less than significant levels. As such, the Project would not create a significant hazard to nearby schools. Therefore, impacts regarding potential emissions or the handling of hazardous materials and wastes within 0.25 mile of an existing school would be less than significant with mitigation.

Reference. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49.

Mitigation Measures

HAZ-MM-1: **(All Site Locations):** Soil Management Plan (SMP) (See above)

HAZ-MM-2: **(Site Locations FF-1, FF-2, FF-3, FF-4, FF-5, FF-6, FF-13, FF-14, FF-29, FF-30, NFF-1, NFF-2, NFF-3, NFF-8, NFF-12, NFF-13, NFF-18, NFF-19, and NFF-21)** (See above)

HAZ-MM-3: **(Site Locations FF-4, NFF-3, NFF-18, and NFF-21)** (See above)

Finding. These potential impacts related to hazards and hazardous materials would be mitigated by requiring compliance with site-specific Soil Management Plans, and where necessary, conducting additional testing and investigations at high-risk Site Locations and Site Locations near suspect oil wells. For the reasons set out above and in the Draft EIR, Metro finds that, through implementation of Mitigation Measures **HAZ-MM-1** through **HAZ-MM-3**, these hazards and hazardous materials impacts near schools would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines

Impact. *Hazardous Materials Sites:* As discussed in Section IV.H of the Draft EIR, two Site Locations have been identified as hazardous waste or contaminated sites pursuant to Government Code Section 65962.5. Although no current violations and no active regulatory cases were identified for the Site Locations, the Project may create a significant hazard to the public or the environment caused in whole or in part from the Project's exacerbation of existing environmental conditions. Therefore, impacts with respect to these sites would be potentially

significant. To mitigate these impacts to a less-than-significant level, Mitigation Measures **HAZ-MM-1** through **HAZ-MM-3**, described above, would be implemented. Therefore, impacts relating to hazardous materials sites would be less than significant with mitigation.

Reference. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49.

Mitigation Measures

HAZ-MM-1: **(All Site Locations):** Soil Management Plan (SMP) (See above)

HAZ-MM-2: **(Site Locations FF-1, FF-2, FF-3, FF-4, FF-5, FF-6, FF-13, FF-14, FF-29, FF-30, NFF-1, NFF-2, NFF-3, NFF-8, NFF-12, NFF-13, NFF-18, NFF-19, and NFF-21)** (See above)

HAZ-MM-3: **(Site Locations FF-4, NFF-3, NFF-18, and NFF-21)** (See above)

Finding. These potential impacts would be mitigated by requiring compliance with site-specific Soil Management Plans, and where necessary, conducting additional testing and investigations at high-risk Site Locations and Site Locations near suspect oil wells. For the reasons set out above and in the Draft EIR, Metro finds that, through implementation of Mitigation Measures **HAZ-MM-1** through **HAZ-MM-3**, the Project's hazards and hazardous materials impacts related to hazardous materials sites would be reduced to less-than-significant levels. For each of these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

6.5 NOISE

As discussed in Section IV.J of the Draft EIR, the Project would create potentially significant impacts related to noise 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; and
- Generate excessive groundborne vibration or groundborne noise levels.

Impact. *Increased Ambient Noise Levels (On-Site Construction):* As discussed in Section IV.J of the Draft EIR, noise generated by the Project's on-site construction equipment would cause a substantial temporary increase in ambient noise levels. Noise levels would exceed the City's significance criteria in the vicinity of seven Site Locations during the daytime and four Site

Locations at nighttime.[3] To mitigate these noise impacts to less-than-significant levels, Mitigation Measures **NOI-MM-1** through **NOI-MM-3**, set forth below, would be implemented.

Reference. Section IV.J, Noise, of the Draft EIR, pages IV.J-26 through IV.J-49.

Mitigation Measures

NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- During TCN Structure NFF 11 Construction: Between the Project construction area and the residential uses on 67th Street north of the Site Location (receptor location R5). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R5.
- During TCN Structure NFF 12 Construction: Between the Project construction area and the residential uses on Victoria Avenue west of the Site Location (receptor location R6). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R6.
- During TCN Structure NFF 14 Construction: Between the Project construction area and the residential uses on Exposition Boulevard southeast of the Site Location (receptor location R7). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R7.
- During TCN Structure NFF 19 Construction: Between the Project construction area and the residential uses on New Hampshire Avenue west of the Site Location (receptor location R10). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R10.
- During TCN Structure NFF 20 Construction: Between the Project construction area and the residential uses on New Hampshire Avenue northwest of the Site Location (receptor location R12). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R12.

[3] Site Locations NFF 11, NFF 12, NFF 19, NFF 20, NFF 21, FF 28, and FF 33 will experience significant daytime ambient noise level increases, and Site Locations NFF 14, FF 13, FF 26, and FF 28 will experience significant nighttime ambient noise level increases.

- During TCN Structure NFF 21 Construction: Between the Project construction area and the residential uses on Mateo Street west of the Site Location (receptor location R13). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R13.
- During TCN Structure FF 13 Construction: Between the Project construction area and the residential uses on Casitas Avenue Street west of the Site Location (receptor location R20). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R20.
- During TCN Structure FF 26 Construction: Between the Project construction area and the residential uses on Sepulveda Boulevard northeast of the Site Location (receptor location R25). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R25.
- During TCN Structure FF 28 Construction: Between the Project construction area and the residential uses on Exposition Boulevard south of the Site Location (receptor location R27). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor location R27.
- During TCN Structure FF 33 Construction: Between the Project construction area and the residential uses on Slauson Avenue north of the Site Location (receptor location R28. The temporary sound barrier shall be designed to provide a minimum 11-dBA noise reduction at the ground level of receptor location R28.

NOI-MM-2: Construction for TCN Structure NFF-20 shall be completed prior to occupation of the adjacent future residential building (receptor R12B). Alternatively, construction equipment for the installation of the TCN Structure NFF-20 shall be limited to a maximum 75 dBA (L_{eq}) at 50 feet from the equipment.

NOI-MM-3: A temporary noise barrier shall be provided during the removal of existing static signage where noise sensitive uses are located within 200 feet of and have direct line-of-sight to the existing static signage to be removed. The temporary noise barrier shall be a minimum six feet tall and break the line-of-site between the construction equipment and the affected noise sensitive receptors.

Finding. These potential noise impacts would be mitigated by requiring temporary sound barriers and limiting certain construction equipment, as described above. For the reasons stated above and as set forth in the Draft EIR, Metro finds that, through implementation of Mitigation Measures **NOI-MM-1** through **NOI-MM-3**, these noise impacts related to ambient noise from on-site construction 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)(1) of the CEQA Guidelines.

Impact. *Vibrations (Human Annoyance from On-Site Construction):* As discussed more fully in Section IV.J of the Draft EIR, the Project construction would result in vibration levels above the threshold for human annoyance at two Site Locations.[4] To mitigate these impacts to a less-than-significant level, Mitigation Measure **NOI-MM-4**, set forth below, would be implemented.

Reference. Section IV.J, Noise, of the Draft EIR, pages IV.J-26 through IV.J-49.

Mitigation Measure

NOI-MM-4: The use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) shall be limited to a minimum of 80 feet away from the existing residences near proposed TCN Structure FF-33 (receptor 28) and the future residences near proposed TCN Structure NFF-20 (receptor 12B), if these residences are constructed and occupied at the time Project construction activities occurs.

Finding. These potential noise impacts would be mitigated by limiting certain construction equipment, as described above. For the reasons stated above and as set forth in the Draft EIR, Metro finds that, through implementation of Mitigation Measure **NOI-MM-4**, these impacts related to on-site construction vibrations 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)(1) of the CEQA Guidelines.

6.6 TRIBAL CULTURAL RESOURCES

As discussed in Section IV.L of the Draft EIR, the Project could result in significant impacts related to tribal cultural resources with respect to the following significance threshold:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    - (i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code section 5020.1(k); or
    - (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

[4] Site Locations FF-33 and NFF-20 will experience vibrations above the human annoyance threshold.

Impacts. As discussed more fully in Section IV.L of the Draft EIR, the Site Locations may contain known or reasonably foreseeable resources determined by Metro to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1 (i.e., tribal cultural resources). As such, the Project may cause a substantial adverse change in the significance of a known tribal cultural resource with cultural value to a California Native American tribe or that is listed or eligible for listing in the California Register or in a local register. Therefore, Project impacts related to tribal cultural resources would be potentially significant.

Reference. Section IV.L, Tribal Cultural Resources, of the Draft EIR, pages IV.L-34 through IV.L-42.

Mitigation Measures

TCR-MM-1: **(Retain a Tribal Consultant and Qualified Archaeologist):** Prior to any ground-disturbing activities on the Site Locations associated with the Project Area, a tribal consultant and qualified archaeologist shall be retained to monitor ground-disturbing activities and ensure proper implementation of the Tribal Cultural Resources Monitoring and Mitigation Program (described in Mitigation Measure TCR-2, below).

Ground disturbing activities are defined as excavating, digging, trenching, drilling, tunneling, grading, leveling, removing asphalt, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at a Site Location. A tribal consultant is defined as one who is on the Native American Heritage Commission (NAHC) Tribal Contact list. The tribal consultant will provide the services of a representative, known as a tribal monitor.

A qualified archaeologist is defined as one who meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) for archaeology. The qualified archaeologist shall submit a letter of retention to Metro no fewer than 30 days before ground-disturbing activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the SOI PQS.

TCR-MM-2: **(Develop a Tribal Cultural Resource Mitigation and Monitoring Program):** Prior to any ground-disturbing activities within the Project Area, a Tribal Cultural Resource Mitigation and Monitoring Program (TCR MMP) shall be prepared by the qualified archaeologist. The TCR MMP shall incorporate the results of SWCA's Tribal Cultural Resources Assessment for the Los Angeles County Metropolitan Transportation Authority's Transportation Communication Network Project report, and reasonable and feasible recommendations from tribal parties resulting from consultation. The TCR MMP shall include provisions for avoidance of unanticipated discoveries and procedures for the preservation of unanticipated discoveries where possible.

The TCR MMP shall include, but not be limited to, provisions to conduct a worker training program, a monitoring protocol for ground-disturbing activities, discovery and processing protocol for inadvertent discoveries of tribal cultural resources, and

identification of a curation facility should artifacts be collected. The TCR MMP shall require monitoring of ground-disturbing activities at all Site Locations and will provide a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving tribal cultural resources are present, and include a protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate at any given Site Location. The duration and timing of the monitoring shall be determined based on the rate of excavation, geoarchaeological assessment, and, if present, the quantity, type, spatial distribution of the materials identified, and input of the tribal consultant or their designated monitor. During monitoring, daily logs shall be kept and reported to Metro on a monthly basis.

During ground-disturbing activities, the monitors shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially tribal cultural resources, as determined by the qualified archaeologist in consultation with the tribal monitor. In the event that tribal cultural resources or potential tribal cultural resources are exposed during construction, work in the immediate vicinity of the find shall stop within a minimum of 25 ft or as determined by the qualified archaeologist in consultation with the tribal consultant based on the nature of the find and the potential for additional portions of the resource to remain buried in the unexcavated areas of the project site. The qualified archaeologist in consultation with the tribal consultant will evaluate the significance of the find and implement the protocol described in the TCR MMP before work can resume in the area surrounding the find that is determined to have sensitivity. Construction activities may continue in other areas in coordination with the qualified archaeologist and tribal consultant. Soils that are removed from the work site are considered culturally sensitive and will be subject to inspection on-site by the tribal and archaeological monitors. Provisions for inspection at an off-site location would be determined through consultation with the tribal and archaeological monitors, construction personnel, and Metro. Any tribal cultural resources that are not associated with a burial are subject to collection by the qualified archaeologist.

The TCR MMP shall also summarize the requirements for coordination with consulting tribal parties in the event of a tribal cultural resource or potential tribal cultural resource is inadvertently discovered, as well as the applicable regulatory compliance measures or conditions of approval for inadvertent discoveries, including the discovery of human remains, to be carried out in concert with actions described in the TCR MMP and treatment plan prepared in compliance with Mitigation Measure TCR-3. The TCR MMP shall be prepared in compliance with Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The TCR MMP shall be submitted to Metro at least 30 days prior to initiating ground-disturbing activities.

TCR-MM-3: **(Treatment of Known Tribal Cultural Resources):** A treatment plan will be developed for any historical archaeological sites that may be adversely

affected/significantly impacted by the Project, including but not limited to CA-LAN-1575/H. The treatment plan will be developed based on the known constituents to guide the post-discovery process and initial treatment requirements upon discovery. The treatment plan will outline data recovery procedures to be followed and shall require controlled archaeological excavation within the first eight feet (ft) at all Site Locations proposed to be located within known tribal cultural resources, specifically an excavation unit measuring 3.28 ft by 3.28 ft across extending to a depth of at least 4.92 ft below the unpaved surface, followed by the use of a 4 inch hollow stem hand-auger to a total depth of at least 9.84 ft below the unpaved surface. Subsequent mechanical drilling will be conducted in approximately 1.64-ft increments to a depth of approximately 20 ft below the surface. Sediments from each of the 1.64-ft mechanical excavation levels will be inspected for the presence of Native American objects or evidence of a tribal cultural resource, and relevant environmental information obtained from the sediments will be recorded. The treatment plan will include provisions to allow for standard mechanical excavation to resume at levels above these depths in the event that sufficient evidence is identified to demonstrate that the sediments are more than 20,000 years old.

The treatment plan may be modified and updated depending on the nature of the discovery and consultation with the State Historic Preservation Office (SHPO) and consulting parties. The treatment plan would be developed so that treatment of historical resources meets the Secretary of the Interior's Standards and Guidelines (1983) for archaeological documentation, the California Office of Historic Preservation (OHP)'s Archaeological Resources Management Report, Recommended Contents and Formats (1989), the Advisory Council on Historic Preservation's publication Treatment of Archaeological Properties: A Handbook, and the Department of the Interior's Guidelines for Federal Agency Responsibility under Section 110 of the National Historic Preservation Act, and the Society for California Archaeology's Guidelines for Determining the Significance of and Impacts to Cultural Resources and Fieldwork and Reporting Guidelines for Archaeological, Historic, and Tribal Cultural Resources

Findings. With the implementation of Mitigation Measures **MM-TCR-1** through **MM-TCR-3**, impacts related to tribal cultural resources would be reduced to a less than significant level. For the reasons stated above and as set forth in the Draft EIR, Metro finds that these impacts related to tribal cultural resources would be reduced to less-than-significant levels. For these impacts, Metro adopts CEQA Finding 1, as identified in Section 4 above and in Section 15091(a)(1) of the CEQA Guidelines.

7. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

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

7.1 AESTHETICS

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

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; and
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

Impact. *Scenic Resources Within a Scenic Highway:* As evaluated in the Initial Study for the Project and discussed in Section IV.A of the Draft EIR, the Site Locations identified for the Project are located within property owned and operated by Metro along freeways and major streets within the City. Most of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. In addition, the Site Locations are not adjacent to any state-designated scenic highways. Thus, the Project would not result in the removal of any structures or trees or be located within a state scenic highway that may be considered scenic resources. Therefore, impacts with respect to scenic resources within a state-designated scenic highway would be less than significant.

References. Section IV.A, Aesthetics, of the Draft EIR, pages IV.A-28 through IV.A-48. Appendix A.1, Initial Study, to the Draft EIR, pages 16–17.

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 Initial Study and Draft EIR, Metro finds that these aesthetic impacts related to scenic resources within a scenic highway would be less than significant.

Impact. *Light and Glare:* As discussed more fully in Section IV.A of the Draft EIR, none of the digital displays proposed for the Project would generate enough light to introduce a substantial light trespass at any nearby residential or other light-sensitive sites. Similarly, none of the displays would generate enough light to create a new source of glare on the roadway. Additionally, the incorporation of Project Design Feature AES-PDF-1 would require state of the art louvers or other equivalent design features to be incorporated into the design of TCN

Structures FF-13, FF-14, FF-25, FF-29, and FF-30 such that the light trespass illuminance at sensitive habitat at the proposed Bowtie State Park, at the mapped biological resources in the vicinity of TCN Structure FF-25, and at the ~~the adjacent residential zoned property and~~ Ballona Wildlife Reserve to the south of the Marina Freeway, west of Culver Boulevard, does not exceed 0.02 footcandles. Therefore, impacts with respect to light and glare would be less than significant.

Reference. Section IV.A, Aesthetics, of the Draft EIR, pages IV.A-28 through IV.A-48.

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 Draft EIR, Metro finds that these aesthetic impacts related to light and glare would be less than significant.

7.2 AIR QUALITY

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

- Conflict with or obstruct implementation of the applicable air quality plan;
- 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;
- Expose sensitive receptors to substantial pollutant concentrations; and
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Impact. *Consistency with Air Quality Plan (Pollutant Emissions):* As discussed more fully in Section IV.B of the Draft EIR, Project construction emissions would not exceed SCAQMD's recommended significance thresholds for local emissions of NOx, CO, PM10, or PM2.5, and operational emissions of these pollutants would be less than significant. Therefore, the project would not significantly impact localized air quality, increase frequency or severity of an existing CO violation or contribute to new CO violations, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

Reference. Section IV.B, Air Quality, of the Draft EIR, pages IV.B-32 through IV.B-61.

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 Draft EIR, Metro finds that these air quality impacts related to air quality plan consistency would be less than significant.

Impact. *Consistency with Air Quality Plan (AQMP Assumptions):* As described more fully in Section IV.B, Air Quality, Section IV.G, Greenhouse Gas Emissions, and Appendix A, Initial Study, of the Draft EIR, the project would not generate substantial long-term employment or residential population growth. Additionally, the Project would comply with all applicable regulatory standards required by SCAQMD, as well as the Metro Green Construction Policy. Finally, the Project would reduce VMT and related vehicular air emissions by removing a higher number of static displays than it will erect TCN Structures, reducing daily vehicle trips for maintenance. For these reasons, the Project would not exceed assumptions utilized in preparing the AQMP and therefore would not conflict with or obstruct implementation of SCAQMD's AQMP.

References. Section IV.B, Air Quality, of the Draft EIR, pages IV.B-32 through IV.B-61. Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, pages IV.G-39 through IV.G-72. Appendix A, Initial Study, to the Draft EIR, pages 44-45.

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 Draft EIR, Metro finds that these air quality impacts related to air quality plan consistency would be less than significant.

Impact. *Consistency with Air Quality Element of City's General Plan:* As discussed above and in Section IV.B of the Draft EIR, the Project will not generate VMT, increase the frequency or severity of an existing air quality violation or cause or contribute to new violations, or exceed State and federal air quality standards or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. The Project would not conflict with growth projections assumed by the AQMP and thus would be consistent with emissions forecasts in the AQMP. Furthermore, compliance with applicable regulatory requirements would prevent any significant air quality impacts. Thus, the Project would serve to implement goals, objectives, and policies of the City's Air Quality Element pertaining to the Project. Therefore, the Project will have a less-than-significant impact on the implementation of the air quality plan.

References. Section IV.B, Air Quality, of the Draft EIR, pages IV.B-32 through IV.B-61. Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, pages IV.G-39 through IV.G-72. Appendix A, Initial Study, to the Draft EIR, pages 44-45.

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 Draft EIR, Metro finds that these air quality impacts related to General Plan consistency would be less than significant.

Impact. *Increase in Non-Attainment Criteria Pollutants:* As discussed above and in Section IV.B of the Draft EIR, Project construction and operations would not result in significant regional or

localized emissions. Therefore, Project emissions would result in a less than significant air quality impact.

Reference. Section IV.B, Air Quality, of the Draft EIR, pages IV.B-32 through IV.B-61.

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 Draft EIR, Metro finds that these air quality impacts related to criteria pollutant emissions would be less than significant.

Impact. *Sensitive Pollutant Receptors:* As described more fully in Section IV.B of the Draft EIR, maximum construction emissions for criteria pollutants would not exceed SCAQMD thresholds at the closest off-site sensitive receptors. Additionally, Project construction would not result in a long-term source of Toxic Air Contaminants (TACs). Similarly, Project operation would not introduce any significant new sources of criteria pollutants, mobile-source CO emissions, or TACs. Therefore, because the Project would not involve substantial TAC sources and would be consistent with applicable CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk or chronic hazard index, and potential impacts would be less than significant.

Reference. Section IV.B, Air Quality, of the Draft EIR, pages IV.B-32 through IV.B-61. Appendix A, Initial Study, to the Draft EIR, pages 32–35. Appendix C-2, Air Quality Worksheets and Modeling Output Files, to the Draft EIR.

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 Draft EIR, Metro finds that these air quality impacts related to sensitive pollutant receptors would be less than significant.

Impact. *Odors:* As described more fully in Section IV.B, Air Quality, and Chapter VI, Other CEQA Considerations, of the Draft EIR, and as evaluated in the Initial Study, Appendix A.1 to the Draft EIR, no objectionable odors are anticipated to adversely affect a substantial number of people as a result of either construction or operation of the Project. Therefore, the potential odor impacts during construction and operation of the Project would be less than significant.

Reference. Section IV.B, Air Quality, of the Draft EIR, pages IV.B-32 through IV.B-61. Appendix A, Initial Study, to the Draft EIR, pages 32–35.

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 Draft EIR, Metro finds that these air quality impacts related to odors would be less than significant.

7.3 BIOLOGICAL RESOURCES

As discussed in Section IV.C of the Draft EIR, the Project would result in less-than-significant impacts related to biological resources with respect to the following significance threshold:

- Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands).

Impact. *Consistency with Local Policies and Ordinances:* As discussed more fully in Section IV.C, Biological Resources, and Chapter VI, Other CEQA Considerations, of the Draft EIR, and evaluated in the Initial Study, Appendix A.1 to the Draft EIR, the proposed Site Locations do not include any protected trees or shrubs and no trees would be removed. Any trees in the vicinity of the Site Locations would be avoided and preserved in place. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Any trees in the vicinity of the Site Locations would be avoided and preserved in place. As such, the Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, impacts related to a conflict with any local policies or ordinances protecting biological resources would be less than significant.

References. Section IV.C, Biological Resources, of the Draft EIR, pages IV.B-32 through IV.B-61. Chapter VI, Other CEQA Considerations, of the Draft EIR, page VI-18. Appendix A.1, Initial Study, to the Draft EIR, pages 22–25.

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 Draft EIR, Metro finds that these biological resources impacts related to consistency with local policies and ordinances would be less than significant.

7.4 CULTURAL RESOURCES

As discussed in Section IV.D of the Draft EIR, the Project would result in less-than-significant impacts related to cultural resources with respect to the following significance threshold:

- Disturb any human remains, including those interred outside of dedicated cemeteries.

Impact. As discussed in Section IV.D, Cultural Resources, Section VI, Other CEQA Considerations, and Appendix A, Initial Study, of the Draft EIR, the Site Locations for the TCN Structures are located within urbanized areas of the City that have been subject to previous grading and development. No known traditional burial sites have been identified on the Site Locations. Nevertheless, as the Project would require excavation at depths of up to 50 feet, the

potential to uncover existing but undiscovered human remains exists. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area for the TCN Structure would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities.

References. Section IV.D, Cultural Resources, of the Draft EIR, pages IV.D-32 through IV.D-64. Section VI, Other CEQA Considerations, of the Draft EIR, page VI-18. Appendix A, Initial Study, to the Draft EIR, pages 26–27.

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 Draft EIR, Metro finds that these cultural resources impacts related to human remains would be less than significant.

7.5 ENERGY

As discussed in Section IV.E of the Draft EIR, the Project would result in less-than-significant impacts 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; and
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact. *Energy Consumption:* As discussed more fully in Section IV.E of the Draft EIR, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with electricity future projections for the region. As also discussed, gasoline fuel usage for the region is expected to be on the decline over the next 10 years. The Project's transportation fuel consumption is also expected to decline based on more stringent CAFE fuel economy standards. As transportation fuel supply is not expected to decrease significantly over

this same period, supplies would be sufficient to meet Project demand. Therefore, electricity generation capacity and supplies of transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. With respect to operation, the Project would comply with existing energy efficiency requirements, such as CALGreen Code, as well as include energy conservation measure requirements. For all the reasons set forth above and in the Draft EIR, the Project's energy demands would not cause wasteful, inefficient, or unnecessary use of energy. Therefore, this Project impact related to energy use would be less than significant with respect to both construction and operation.

References. Section IV.E, Energy, of the Draft EIR, pages IV.E-18 through IV.E-36. Appendix F, Energy Calculations, to the Draft EIR.

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 Draft EIR, Metro finds that these energy impacts related to energy consumption would be less than significant.

Impact. *Consistency with Energy Plans:* The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, Metro's Green Construction Policy, Metro's CAAP the City of Los Angeles Green Building Code, City of LA Green New Deal, and SCAG's 2020–2045 RTP/SCS. As these conservation policies would be incorporated as part of the Project, the Project would not conflict with applicable plans for renewable energy or energy efficiency. Regarding transportation uses, the Project would not generate trips or VMT on a regular basis. The removal of existing static displays would result in a net reduction in maintenance trips and VMT in comparison to the Project. In addition, the TCN Structures would relay traffic information to the public such as traffic congestion events and provide travel alternatives to maximum efficiency of the congested road network reducing fuel consumption. Further, the TCN Structures would provide off-site advertising create funds for new and expanded transportation programs including the potential to fund GHG reduction measures such as bus electrification programs and programs to further improve the experience for bus passengers. While these actions may not directly reduce VMT, the increase in efficiency of the roadway would reduce travel and delay times throughout the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations reducing unnecessary energy consumption. For these reasons, the Project would not conflict with or obstruct adopted energy conservation plans or violate State or local energy standards for renewable energy or energy efficiency. Therefore, Project impacts related to consistency with renewable energy or energy efficiency plans would be less than significant.

Reference. Section IV.E, Energy, of the Draft EIR, pages IV.E-18 through IV.E-36.

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 Draft EIR, Metro finds that these energy impacts related to energy plan consistency would be less than significant.

7.6 GEOLOGY AND SOILS

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

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42;
    - (ii) Strong seismic ground shaking; or
    - (iii) Seismic-related ground failure, including liquefaction;
- Result in substantial soil erosion or the loss of topsoil;
- 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:
    - Lateral spreading;
    - Subsidence;
    - Liquefaction; or
    - Collapse; and
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

Impact. *Earthquake Faults:* As discussed in Section IV.F of the Draft EIR and the Geology and Soils Evaluation included as Appendix G of the Draft EIR, no known active or potentially active faults underlie the Site Locations. In addition, the Site Locations are not located within a state-designated Alquist-Priolo Earthquake Fault Zone. Each Site Location is between 0.25 mile and 6 miles from its nearest fault, and the nearest fault varies by Site Location. The potential for surface rupture due to faulting occurring beneath the Site Locations is considered low. Additionally, ground disturbance associated with the removal of static displays would be temporary and minimal. Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant.

References. Section IV.F, Geology and Soils, of the Draft EIR, pages IV.F-46 through IV.F-56. Appendix G, Geology and Soils Evaluation, to the Draft EIR.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these geology and soils impacts related to earthquake faults would be less than significant.

Impact. *Strong Seismic Ground Shaking:* As described in Section IV.F of the Draft EIR and the Geology and Soils Evaluation included as Appendix G of the Draft EIR, the Site Locations are located within the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. However, State and local codes require that structures are designed and constructed to reduce risk of collapse during an earthquake. Additionally, compliance with Project Design Feature GEO-PDF-1, which would require all development activities to incorporate various geotechnical recommendations, will reduce these risks. Further, the Project would not involve any construction or operations activities that would create unstable seismic conditions or stresses in the earth's crust. As discussed above, there are no known active faults underlying the Project site. Therefore, impacts associated with strong seismic ground shaking would be less than significant.

References. Section IV.F, Geology and Soils, of the Draft EIR, pages IV.F-46 through IV.F-56. Appendix G, Geology and Soils Evaluation, to the Draft EIR.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these geology and soils impacts related to seismic ground shaking would be less than significant.

Impact. *Seismic-Related Ground Failure:* As discussed in Section IV.F of the Draft EIR and the Geology and Soils Evaluation included as Appendix G of the Draft EIR, site-specific liquefaction analyses would be required by Project Design Feature GEO-PDF-1 in order to determine if the site soils would be susceptible to liquefaction during the design-based seismic event, which is the event a structure is designed to withstand without collapsing. If the sites are susceptible to liquefaction, the proposed TCN Structures would be supported by a deep foundation system consisting of caissons or piles. Additionally, the Project would be designed in accordance with the MRDC and Los Angeles Building Code, which requires implementation of engineering techniques to minimize ground failure hazards. Lastly, ground disturbance associated with the removal of static displays would be temporary and minimal. As such, the Project would not exacerbate existing environmental conditions or cause or accelerate geologic hazards related to liquefaction. Therefore, impacts associated with seismic-related ground failure, including liquefaction, would be less than significant.

References. Section IV.F, Geology and Soils, of the Draft EIR, pages IV.F-46 through IV.F-56. Appendix G, Geology and Soils Evaluation, to the Draft EIR.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these geology and soils impacts related to seismic ground failure would be less than significant.

Impact. *Erosion and Soil Loss:* The TCN Structures would be constructed with the use of a drill rig that would drill a hole up to 50 feet in depth on an approximately 10-foot by 10-foot area, depending on soil conditions and size of the digital display. As such, grading activities and potential soil erosion and loss of topsoil would be limited. In addition, all grading activities would require review and approval of a final site-specific geotechnical report by the Metro Capital Engineering Group and/or LADBS, which would include requirements and standards designed to ensure that substantial soil erosion does not occur. Furthermore, on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Lastly, ground disturbance associated with the removal of static displays would be temporary and minimal. Therefore, with compliance with regulatory requirements, the Project would not result in substantial soil erosion or the loss of topsoil. As such, this impact related to geology and soils would be less than significant.

Reference. Section IV.F, Geology and Soils, of the Draft EIR, pages IV.F-46 through IV.F-56.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these geology and soils impacts related to soil loss would be less than significant.

Impact. *Soil Instability – Liquefaction and Lateral Spreading:* As discussed more in Section IV.F of the Draft EIR and the Geology and Soils Evaluation, the Project's impacts the Site Locations are susceptible to lateral spreading wherever they are susceptible to liquefaction, as liquefaction-related effects include lateral spreading. As discussed above, Project Design Feature GEO-PDF-1 will require site-specific liquefaction analyses to avoid ground failure. The Project would not cause or accelerate liquefaction. Therefore, impacts related to liquefaction and lateral spreading would be less than significant.

References. Section IV.F, Geology and Soils, of the Draft EIR, pages IV.F-46 through IV.F-56. Appendix G, Geology and Soils Evaluation, to the Draft EIR.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these geology and soils impacts related to soil instability would be less than significant.

Impact. *Soil Instability – Subsidence:* As discussed more in Section IV.F of the Draft EIR and the Geology and Soils Evaluation, no large-scale extraction of groundwater, gas, oil, or geothermal energy currently occurs or is planned at the Site Locations. Therefore, the potential for ground subsidence due to the withdrawal of fluid or gas at the Site Locations are low. Project excavations for placement of the TCN Structures would extend to a maximum depth of approximately 50 feet. As discussed in the Geology and Soils Evaluation, the historic high groundwater levels vary according to the location of each TCN Structure and may be as shallow as 5 feet below ground surface. Although dewatering operations may be required during construction, such activities would be limited and temporary and would not involve large-scale water extraction. Lastly, ground disturbance associated with the removal of static displays would be temporary and minimal. As such, the Project would not be located on or exacerbate a geologic unit or soil that is unstable, which could potentially result in subsidence. Impacts related to subsidence would be less than significant.

References. Section IV.F, Geology and Soils, of the Draft EIR, pages IV.F-46 through IV.F-56. Appendix G, Geology and Soils Evaluation, to the Draft EIR.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these geology and soils impacts related to soil instability would be less than significant.

Impact. *Soil Instability – Collapse:* As discussed in Section IV.F of the Draft EIR and the Geology and Soils Evaluation, the fill soil composition and depth that underlie the proposed TCN Structures vary by Site Location. The proposed TCN Structures would thus be supported by foundation systems according to the soil type, with deep foundation systems potentially necessary at certain sites. Depending on the geologic materials at each individual site, the foundation system may derive its bearing capacity from native alluvial soils, and/or bedrock. Fill materials are not considered suitable for support of the recommended foundation system and would not be used. These recommendations would be incorporated in accordance with Project Design Feature GEO-PDF-1. In addition, the Project would be required to provide a final, site-specific geotechnical report that would include the preliminary recommendations from the Geology and Soils Evaluation as well as final recommendations that would be enforced by the Metro Capital Engineering Group and/or LADBS. Lastly, ground disturbance associated with the removal of static displays would be temporary and minimal. As such, the Project would not be located on or exacerbate a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant.

Reference. Section IV.F, Geology and Soils, of the Draft EIR, pages IV.F-46 through IV.F-56. Appendix G, Geology and Soils Evaluation, to the Draft EIR.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these geology and soils impacts related to soil instability would be less than significant.

Impact. *Expansive Soils:* As discussed in Section IV.F of the Draft EIR and the Geology and Soils Evaluation, the on-site geologic materials at the Site Locations are in the low to high expansion range. Per Project Design Feature GEO-PDF-1, it is anticipated that where structurally necessary, the proposed TCN Structures would be supported by a deep foundation system, consisting of caissons or piles. Depending on the geologic materials encountered at each individual site, the foundation system may derive its bearing capacity from native alluvial soils, and/or bedrock. Fill materials are not considered suitable for support of the recommended foundation system and would not be used. Lastly, ground disturbance associated with the removal of static displays would be temporary and minimal. With implementation of Project Design Feature GEO-PDF-1, potential impacts associated with expansive soils would be less than significant.

References. Section IV.F, Geology and Soils, of the Draft EIR, pages IV.F-46 through IV.F-56. Appendix G, Geology and Soils Evaluation, to the Draft EIR.

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

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

7.7 GREENHOUSE GAS EMISSIONS

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

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

Impact. The Project would result in direct and indirect GHG emissions generated by different types of emissions sources, including construction, display operations, vehicles accessing the Project site, and off-road equipment. As discussed more fully in Section IV.G of the Draft EIR, when taking into consideration implementation of the Metro 2019 CAAP GHG reduction measures, as well as the applicable requirements set forth in Metro's Green Construction Policy and the City of Los Angeles Green Building Code, and full implementation of current State mandates, the Project's GHG emissions for the Project in 2025 would equal 35 $MTCO_2e$ per year (amortized over 30 years) during construction and 479 $MTCO_2e$ per year during operation of the Project with a combined total of approximately 514 $MTCO_2e$ per year.

CEQA Guidelines Section 15064.4(b)(2) allows a lead agency to determine a threshold of significance that applies to the Project, and, accordingly, the threshold of significance applied here is whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For the Project, the applicable adopted regulatory plan to reduce GHG emissions is SCAG's 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by AB 32's *2008 Climate Change Scoping Plan* and subsequent updates, Metro's 2019 CAAP and the City of LA's Green New Deal.

As described in Section IV.G of the Draft EIR, the Project's features, and design render it consistent with Statewide, regional, and local climate change mandates, plans, policies, and recommendations. The Project's signage would assist with reducing congestion and delay times of motorists by providing traffic information and alternative routes which would result in a reduction in GHG emissions. Further, the TCN Structures would provide off-site advertising that would direct funds to new and expanded transportation programs including the potential to fund GHG reduction measures such as bus electrification programs which would be consistent with goals of SCAG's 2020-2045 RTP/SCS. The plan consistency analysis provided in the Draft EIR demonstrates that the Project complies with or exceeds the plans, policies, regulations, and GHG reduction actions/strategies outlined in CARB's *2008 Climate Change Scoping Plan* and subsequent updates, SCAG's 2020–2045 RTP/SCS, City of Los Angeles' Green New Deal and Metro's 2019 CAAP. Thus, the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Furthermore, because the Project would be consistent with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project impacts related to GHG emissions would be less than significant.

References. Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, pages IV.G- through IV.G-72. Appendix C-3, Greenhouse Gas Worksheets and Modeling Output Files, to the Draft EIR.

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 and in the Draft EIR, Metro finds that this impact related to greenhouse gas emissions would be less than significant.

7.8 HAZARDS AND HAZARDOUS MATERIALS

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

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; and
- Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan

Impact. *Transport, Use, and Disposal of Hazardous Materials:* As discussed in Section IV.H, Hazards and Hazardous Materials, Section VI, Other CEQA Considerations, and Appendix A, Initial Study, of the Draft EIR, the Project could include the routine use of hazardous materials such as fuel and oils associated with construction equipment, coatings, paints, adhesives, and cleaners. Project Operations would involve the routine use of small quantities of potentially hazardous materials typical of those used for maintenance of TCN Structures. Such use would be consistent with that currently occurring within the vicinity of the Site Locations. All potentially hazardous materials used during construction and operations would be used and disposed of in accordance with manufacturers' specifications and instructions. Additionally, the transport, use, and storage of hazardous materials during construction and operations would be required to comply with all applicable State and federal laws. As such, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant.

References. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49. Section VI, Other CEQA Considerations, pages VI-19 through VI-20. Appendix A, Initial Study, to the Draft EIR, pages 32–35.

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

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

Impact. *Release of Methane Gas:* As discussed in Section IV.H of the Draft EIR, several Site Locations are located zones where there may be subsurface methane gas produced from naturally occurring petroleum fields. The Project would comply with all applicable regulations regarding methane. When properly implemented, compliance measures would reduce methane-related risks to a less than significant level. As such, with regulatory compliance, the Project would not exacerbate the risk of upset and accident conditions associated with methane. Therefore, impacts related to methane would be less than significant.

Reference. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49.

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

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

Impact. *Release of Asbestos-Containing Materials:* As discussed in Section IV.H of the Draft EIR, asbestos-containing materials (ACMs) may be present in the static displays that would be removed as part of the Project. The Project would comply with all applicable regulatory measures regarding ACMs. With compliance with applicable regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. As such, with regulatory compliance, the Project would not exacerbate the risk of upset and accident conditions associated with ACMs. Therefore, impacts related to ACMs would be less than significant.

Reference. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49.

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

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

Impact. *Release of Lead-Based Paint:* As discussed in Section IV.H of the Draft EIR, lead-based paint (LBP) may be present in the approximately 200 static displays (at minimum) to be taken down as part of the Project. The Project would comply with all applicable regulatory

measures regarding LBP. With compliance with applicable regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. As such, with regulatory compliance, the Project would not exacerbate the risk of upset and accident conditions associated with LBPs. Therefore, impacts related to LBP would be less than significant.

Reference. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49.

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

Finding. For the reasons stated above and as set forth in the Draft EIR, Metro finds that these hazards and hazardous materials impacts related to the release of lead-based paints would be less than significant

Impact. *Release of Hazardous Materials (During Project Operation):* As discussed in Section IV.H of the Draft EIR, Project operation would involve the routine use of small quantities of potentially hazardous materials. Such use would be consistent with that currently occurring within the vicinity of the Site Locations. In addition, all hazardous materials used at the Site Locations during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Therefore, impacts related to the release of hazardous materials during operation would be less than significant.

Reference. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49.

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

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

Impact. *Emergency Plan Interference:* As discussed in Section VI, Other CEQA Considerations, Appendix A, Initial Study, and Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City and would, therefore, be located near several disaster routes designated by the City's Safety Element. However, Project construction would not result in interference with adopted emergency plans because temporary construction barricades or other obstructions would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. Development and implementation of these plans for all construction activity would minimize potential impacts associated with emergency procedures. During operation, the Project would not require the

permanent closure of any local public or private streets and would not impede emergency vehicle access to the Site Locations or surrounding area Therefore, with compliance with applicable regulatory requirements, the Project would not impede emergency access within the Site Locations or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. Furthermore, one of the primary benefits of the TCN Program is to enhance communication during emergency events. Therefore, impacts related to the implementation of the City's emergency response plan would be less than significant.

References. Section IV.H, Hazards and Hazardous Materials, of the Draft EIR, pages IV.H-20 through IV.H-49. Section VI, Other CEQA Considerations, pages VI-19 through VI-20. Appendix A, Initial Study, to the Draft EIR, pages 32–35.

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

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

7.9 HYDROLOGY AND WATER QUALITY

As discussed in the Initial Study, Appendix A.1 to the Draft EIR, the Project would result in less-than-significant impacts related to hydrology and water quality with respect to the following significance thresholds:

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

- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact. *Surface and Groundwater Quality:* As discussed more fully in Section VI, Other CEQA Considerations, and Appendix A.1, Initial Study, of the Draft EIR, with the implementation of regulatory requirements and BMPs, Project construction would not result in the discharge of potential pollutants into stormwater runoff for all Site Locations, including those adjacent to the LA River and Ballona Wetlands. Furthermore, the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement associated with groundwater protection for all Site Locations including those adjacent to the LA River and Ballona Wetlands. Similarly, all hazardous materials used at the Site Locations during operation would be used in accordance with manufacturers specifications and regulatory requirements. Therefore, the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality or groundwater quality.

References. Chapter VI, Other CEQA Considerations, to the Draft EIR, pages VI-20 through VI-23. Appendix A, Initial Study, to the Draft EIR, pages 36–41.

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

Finding. For the reasons stated above and as set forth in the Draft EIR, Metro finds that these hydrology and water quality impacts related to surface and groundwater quality would be less than significant.

Impact. *Groundwater Recharge:* Due to the limited size of the holes that would be drilled and the temporary nature of any dewatering, the Project would not substantially impact groundwater supplies or groundwater recharge during construction. Therefore, the Project's temporary construction activities would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basins for all Site Locations, including those adjacent to the LA River and Ballona Wetlands. Additionally, the amount of impervious area created by the Project would be minimal, as each of the 56 proposed TCN Structures would be constructed on an approximately 10-foot by 10-foot area. Furthermore, the Project would not include the installation of water supply wells. Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basins. Thus, impacts with regard to groundwater recharge during construction and operation would be less than significant.

References. Chapter VI, Other CEQA Considerations, to the Draft EIR, pages VI-20 through VI-23. Appendix A, Initial Study, to the Draft EIR, pages 36–41.

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 Draft EIR, Metro finds that these hydrology and water quality impacts related to groundwater recharge would be less than significant.

Impact. *Erosion, Siltation, and Runoff:* Each TCN Structure would be constructed on an approximately 10-foot by 10-foot area, and would not be located within a stream or river. In addition, as discussed above, grading and trenching activities associated with construction of the TCN Structures would be limited. As discussed above, during construction, the Project would implement BMPs and erosion control measures in accordance with regulatory requirements for all Site Locations, including those adjacent to the LA River and Ballona Wetlands. Such BMPs and erosion control measures would also control runoff. Additionally, the impervious area created by the TCN Structures would be minimal and would not alter existing drainage patterns in the area such that substantial erosion or siltation would occur. Therefore, impacts with regard to erosion and siltation as well as runoff during construction and operation would be less than significant.

References. Chapter VI, Other CEQA Considerations, to the Draft EIR, pages VI-20 through VI-23. Appendix A, Initial Study, to the Draft EIR, pages 36–41.

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

Finding. For the reasons stated above and as set forth in the Draft EIR, Metro finds that these hydrology and water quality impacts related to erosion, siltation, and runoff would be less than significant.

Impact. *Flooding:* The TCN Structures would be constructed on an approximately 10-foot by 10-foot area, creating an impervious area that would not be large enough to substantially impede, alter or redirect flood flows. Additionally, the use of hazardous materials during construction and operations would comply with manufacturers' specifications and instructions and regulatory requirements. Therefore, the Project would not risk release of pollutants due to project inundation, and impacts with regard to the release of pollutants due to project inundation would be less than significant.

References. Chapter VI, Other CEQA Considerations, to the Draft EIR, pages VI-20 through VI-23. Appendix A, Initial Study, to the Draft EIR, pages 36–41.

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

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

Impact. *Consistency with Water Plans:* During construction, the implementation of BMPs and erosion control measures in accordance with regulatory requirements would target any pollutants that could potentially be carried in stormwater runoff. Furthermore, any hazardous materials used during construction and operation (for maintenance) would be used in accordance with manufacturer's specifications and regulatory requirements. In addition, the minimal excavation required for the TCN Structures would not substantially impact groundwater, and in the event dewatering is required, such dewatering would occur in accordance with regulatory requirements. As such, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Therefore, impacts with regard to a water quality control plan or a sustainable groundwater management plan would be less than significant.

References. Chapter VI, Other CEQA Considerations, to the Draft EIR, pages VI-20 through VI-23. Appendix A, Initial Study, to the Draft EIR, pages 36–41.

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

Finding. For the reasons stated above and as set forth in the Draft EIR, Metro finds that these hydrology and water quality impacts related to Water Quality Control Plans and Sustainable Groundwater Management Plans would be less than significant.

7.10 LAND USE AND PLANNING

As discussed in Section IV.I of the Draft EIR, the Project would result in less-than-significant impacts related to land use and planning with respect to the following significance threshold:

- Physically divide an established community.

Impact. *Physical Division of Community:* As discussed further in Section IV.I, Land Use and Planning, Chapter VI, Other CEQA Considerations, and Appendix A.1, Initial Study, to the Draft EIR, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City. The TCN Structures would be constructed on a 10-foot by 10-foot area, and, therefore, the area of disturbance for each TCN Structure would be minimal. In addition, the Project does not include buildings or large infrastructure improvements (such as a freeway) that could divide the existing surrounding community. Therefore, as determined in the Initial Study, the Project would not physically divide an established community. As such, these impacts would be less than significant.

References. Section IV.I, Land Use and Planning, of the Draft EIR, page IV.I-14. Chapter VI, Other CEQA Considerations, of the Draft EIR, page VI-23. Appendix A.1, Initial Study, to the Draft EIR, pages 41–42.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these land use and planning impacts related to physical division of an established community would be less than significant.

7.11 MINERAL RESOURCES

As discussed in Chapter VI of the Draft EIR, the Project would result in less-than-significant impacts related to mineral resources with respect to the following significance thresholds:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and
- Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Impact. *Availability of Known Valuable Resources:* As discussed further in Chapter VI, Other CEQA Considerations, and Appendix A.1, Initial Study, to the Draft EIR, some of the Site Locations are mapped within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, a mineral producing area as classified by the California Geological Survey, and a City-designated oil field or oil drilling area. However, no mineral extraction operations currently occur at the Site Locations for the TCN Structures, nor are any such operations proposed as part of the Project. In addition, the TCN Structures would be constructed on a 10-foot by 10-foot area located adjacent to already developed roadways and the Zoning Ordinance enabling the review and approval of Site Locations for TCN Structures would further limit the locations for development. As such, these impacts would be less than significant.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, page VI-23. Appendix A.1, Initial Study, to the Draft EIR, pages 42–43.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these impacts to mineral resources related to the availability of known valuable mineral resources would be less than significant.

Impact. *Locally-Important Recovery Sites:* For the same reasons discussed above with respect to the availability of known valuable mineral resources, these impacts would be less than significant..

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, page VI-23. Appendix A.1, Initial Study, to the Draft EIR, pages 42–43.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these impacts to mineral resources related to the availability of locally-important mineral resource recovery sites would be less than significant.

7.12 NOISE

As discussed in Section IV.J of the Draft EIR, the Project would result in less-than-significant impacts related to noise 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;
- Generate excessive groundborne vibration or groundborne noise levels; and
- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

Impact. *Increased Ambient Noise Levels (Off-Site Construction):* As discussed in Section IV.J of the Draft EIR, the major noise sources associated with off-site construction trucks would be from the material delivery/concrete/haul trucks, which would travel between the Site Locations and the nearest freeway ramps. Project construction would generate a maximum of five trucks per day. Noise generated by these trucks would be well below the existing ambient noise levels along the roadways between the Site Locations and the nearest freeway. Therefore, temporary noise impacts from of-site construction traffic would be less than significant.

Reference. Section IV.J, Noise, of the Draft EIR, pages IV.J-26 through IV.J-49.

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

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

Impact. *Increased Ambient Noise Levels (Operation):* As discussed in Section IV.J of the Draft EIR, Project operations would not generate any on-site noise or significant vehicle trips. Vehicle trips would only occur occasionally for maintenance activities as needed. As such, Project operations would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the City's general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project's operational noise impacts from on- and off-site sources would be less than significant.

Reference. Section IV.J, Noise, of the Draft EIR, pages IV.J-26 through IV.J-49.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these noise impacts related to Project operations would be less than significant.

Impact. *Vibrations (Building Damage from On-Site Construction):* As discussed in Section IV.J of the Draft EIR, the Project would generate groundborne construction vibration. The FTA has published standard vibration velocities for various construction equipment operations. The highest vibration generation would occur during the drilling for the structure foundation and would remain well below the most stringent vibration thresholds. In addition, the removal of the existing static displays would not require the use of large earthmoving equipment. Therefore, vibration associated with the existing static displays removal (e.g., a mobile crane, container truck and small backhoe) would be well below the building damage significance threshold. Therefore, the on-site vibration impacts during construction of the Project, pursuant to the significance criteria for building damage, would be less than significant.

Reference. Section IV.J, Noise, of the Draft EIR, pages IV.J-26 through IV.J-49.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these noise impacts related to on-site construction vibrations would be less than significant.

Impact. *Vibrations (Off-Site):* According to FTA data, "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Therefore, vibration generated by construction trucks traveling along the anticipated haul routes would be well below both the most stringent building damage criterion and the applicable human annoyance criterion. As such, the Project's vibration impact from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant.

Reference. Section IV.J, Noise, of the Draft EIR, pages IV.J-26 through IV.J-49.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these noise impacts related to off-site vibrations would be less than significant.

Impact. *Vibrations (Operation):* As discussed in Section IV.J of the Draft EIR, the Project operation would not generate any significant vibration sources. Therefore, operation of the Project would not result in the generation of excessive groundborne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Project would be less than significant.

Reference. Section IV.J, Noise, of the Draft EIR, pages IV.J-26 through IV.J-49.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these noise impacts related to Project operations would be less than significant.

Impact. *Airport Noise:* Several Site Locations are located within two miles of a public airport. However, there are no people residing in or working at the TCN Structures, which would be exposed to aircraft noise. Therefore, the Project would not expose people to excessive airport noise levels, and noise impacts would be less than significant.

Reference. Section IV.J, Noise, of the Draft EIR, pages IV.J-26 through IV.J-49.

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

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

7.13 POPULATION AND HOUSING

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

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

Impact. *Population Growth:* While construction of the Project would create temporary construction-related jobs, the construction workers would likely be hired from the large, highly mobile regional construction work force already living and working within the Los Angeles

metropolitan region that moves from project to project. The work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the short duration of the work for construction of each TCN Structure and takedown of an existing static display, and the large size and mobility of the construction labor pool that can be drawn upon in the region, construction workers would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities and, therefore, no new permanent residents would be generated during construction of the Project. Additionally, while the TCN Program operations could result in additional employment, the additional employees would not be substantial in number and would likely already live in the region. As such, Project operations would not induce substantial unplanned population growth. Therefore, the Project's impacts relating to substantial population growth would be less than significant.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, page VI-24. Appendix A.1, Initial Study, to the Draft EIR, pages 44–45.

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 Draft EIR, Metro finds that these population and housing impacts related to population growth would be less than significant.

7.14 PUBLIC SERVICES

As discussed in Chapter VI of the Draft EIR, the Project would result in less-than-significant impacts related to public services with respect to the following significance threshold:

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

Impact. *Public Facilities:* Due to the small size of the construction areas and limited duration of construction activities, construction of the Project would generate minimal demand for police and fire protection services. In addition, construction workers would not be expected to relocate

their residences within this region or move from other regions into this region and thus would not generate a demand for additional schools, parks or libraries. As such, construction of the Project would not result in a demand for new fire facilities, police facilities, schools, parks, or other public facilities such as libraries, the construction of which could cause significant impacts. In addition, while the TCN Program could result in additional employees associated with operation of the Program, the additional employees would not be substantial in number and would likely already live in the region. As such, operation of the Project would not result in the demand for new fire facilities, police facilities, schools, parks, or other public facilities such as libraries, the construction of which could cause significant impacts. Therefore, impacts associated with public services would be less than significant.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, page VI-25. Appendix A.1, Initial Study, to the Draft EIR, pages 45–46.

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 Draft EIR, Metro finds that these public services impacts would be less than significant.

7.15 RECREATION

As discussed in Chapter VI of the Draft EIR, the Project would result in less-than-significant impacts related to recreation with respect to the following significance thresholds:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact. *Increased Facility Use:* As discussed more in Chapter VI, Other CEQA Considerations, and Appendix A.1, Initial Study, of the Draft EIR, the Project does not propose the development of residential uses, which would create a demand on nearby parks or recreational facilities. Additionally, the Project would not result in a substantial increase in new employees within the region. Therefore, the Project would not substantially increase the demand for offsite public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. These impacts would be less than significant.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, page VI-25. Appendix A.1, Initial Study, to the Draft EIR, page 47.

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 Draft EIR, Metro finds that these recreation impacts related to increased recreational facility use would be less than significant.

Impact. *New/Expanded Facilities:* As discussed more in Chapter VI, Other CEQA Considerations, and Appendix A.1, Initial Study, of the Draft EIR, the Project does not include recreational facilities. Additionally, as discussed above, the Project does not include residential uses that would result in the increased use of existing facilities. Thus, the Project would not necessitate construction of new facilities. These impacts would be less than significant.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, page VI-25. Appendix A.1, Initial Study, to the Draft EIR, page 47.

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 Draft EIR, Metro finds that these recreation impacts related to new or expanded recreational facilities would be less than significant.

7.16 TRANSPORTATION

As discussed in Section IV.K of the Draft EIR, the Project would result in less-than-significant impacts related to transportation 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;
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and
- Result in inadequate emergency access.

Impact. *Consistency with Programs, Plans, Ordinances, and Policies:* The programs, plans, ordinances, and policies applicable to the Project include the Metro 2028 Vision Plan, the 2020-2045 RTP/SCS, the Mobility Plan, the LAMC, LADOT's Vision Zero Program, the Health and Wellness Element of the Plan for a Healthy Los Angeles, the California Vehicle Code, and the California Outdoor Advertising Permit Requirements. As discussed more fully in Section IV.K, Transportation, Section IV.B, Air Quality, and Appendix I, Land Use, of the DEIR, the Project would not conflict with any of these programs, plans, ordinances, or policies. Therefore, the Project's impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities is less than significant.

References. Chapter IV.K, Transportation, of the Draft EIR, pages IV.K-10 through IV.K-23. Section IV.B, Air Quality, of the Draft EIR, pages IV.B-32 through IV.B-61. Appendix I, Land Use, to the Draft EIR.

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 Draft EIR, Metro finds that these transportation impacts related to program, plan, ordinance, and policy consistency would be less than significant.

Impact. *Geometric Design Features and Incompatible Uses:* The digital display faces of the TCN Structures would use LED lighting with a daytime maximum of up to 6,000 candelas and 300 maximum candelas at nighttime, depending on the Site Location. Louvers would be installed to shade the LED lights from creating unintentional light spillage, assist in reducing reflection, and in turn would create a sharper image. Further, the digital displays would be set to refresh every 8 seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would conform to applicable Federal and State regulations for signs oriented toward roadways and freeways. Thus, as described more fully in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR, Project operation would not create a dangerous distraction for drivers. Based on the facts above and in the Draft EIR, Project impacts relating to hazards from geometric design features or incompatible uses would be less than significant.

References. Chapter IV.K, Transportation, of the Draft EIR, pages IV.K-10 through IV.K-23. Appendix K, Transportation and Traffic Safety Review, to the Draft EIR.

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

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

Impact. *Emergency Access:* As discussed in Section IV.K, Transportation, Section VI, Other CEQA Considerations, and Appendix A, Initial Study, of this Draft EIR, while it is expected that most construction activities for the Project would be confined to the Site Locations, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Additionally, Project operations would not alter existing traffic patterns. Furthermore, one of the primary benefits of the TCN Program is to provide communication to travelers during emergency events. Therefore, the Project would not result in inadequate emergency access to the Site Locations or surrounding uses. As such, impacts regarding emergency access would be less than significant.

References. Section IV.K, Transportation, of the Draft EIR, pages IV.K-10 through IV.K-23. Section VI, Other CEQA Considerations, of the Draft EIR, pages VI-25 through VI-26. Appendix A, Initial Study, to the Draft EIR, pages 47–49.

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 Draft EIR, Metro finds that these transportation impacts related to emergency access would be less than significant.

7.17 UTILITIES AND SERVICE SYSTEMS

As discussed in Section IV.M, Utilities and Service Systems, and Chapter VI, Other CEQA Considerations, of the Draft EIR, the Project would result in less-than- significant impacts related to utilities and service systems with respect to the following significance thresholds:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
- Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and
- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Impact. *Electrical Facilities:* As discussed more fully in Section IV.M, Utilities and Service Systems, and Section IV.E, Energy, of the Draft EIR, Project construction would require minimal electricity and would not adversely affect existing electrical infrastructure serving the surrounding uses. Similarly, LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's operational electricity demand. Based on these facts and those in the Draft EIR, Project construction and operations would not result in an increase in demand for electricity that exceeds the existing available supply or distribution infrastructure capabilities, such that construction of new energy facilities or expansion of existing facilities would be required. Therefore, this impact related to utilities and service systems would be less than significant.

References. Section IV.M, Utilities and Service Systems, of the Draft EIR, pages IV.M-5 through IV.M-7. Section IV.E, Energy, of the Draft EIR, pages IV.E-18 through IV.E-36.

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

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

Impact. *Water, Wastewater Treatment, Stormwater Drainage, Natural Gas, and Telecommunications Facilities:* The Project would involve limited use of water during construction and operation (associated with maintenance) and would not generate wastewater. Additionally, the Project would not be of a size or type that would generate the demand for substantial stormwater drainage infrastructure improvements. Furthermore, construction and operation of the Project would not utilize natural gas and thus would not generate a demand for new natural gas infrastructure. Finally, construction and operation of the Project would not result in the demand for substantial telecommunications infrastructure improvements. Therefore, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, natural gas or telecommunication facilities. Thus, these impacts would be less than significant.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, pages VI-26 through VI-27. Appendix A.1, Initial Study, to the Draft EIR, pages 50–53.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these utilities and service systems impacts related to water, wastewater, stormwater, natural gas, and telecommunications facilities would be less than significant.

Impact. *Water Supply:* The Project would have a minimal demand for water during construction and during operation (related to maintenance). Therefore, the Project would not result in impacts associated with water supply.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, pages VI-26 through VI-27. Appendix A.1, Initial Study, to the Draft EIR, pages 50–53.

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

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

Impact. *Solid Waste Generation:* The project would generate a minimal amount of construction waste which would be accommodated within the Azusa Land Reclamation Landfill's remaining disposal capacity of 58.84 million tons. Soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess

of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Furthermore, the Project would not generate on-site employees or residents. As such, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, pages VI-26 through VI-27. Appendix A.1, Initial Study, to the Draft EIR, pages 50–53.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these utilities and service systems impacts related to solid waste generation would be less than significant.

Impact. *Solid Waste Laws and Regulations:* The Project would comply with applicable waste diversion requirements during construction. As operation of the Project would not generate solid waste, there are no regulations that would be implemented. Therefore, impacts related to solid waste would be less than significant.

References. Chapter VI, Other CEQA Considerations, of the Draft EIR, pages VI-26 through VI-27. Appendix A.1, Initial Study, to the Draft EIR, pages 50–53.

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

Finding. For the reasons stated above and in the Draft EIR, Metro finds that these utilities and service systems impacts related to solid waste laws and regulations would be less than significant.

8. ENVIRONMENTAL RESOURCES FOUND TO NOT BE IMPACTED

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

- Agriculture and Forestry Resources (farmland conversion; conflicts with agricultural zoning or Williamson Act contracts; conflicts with forest land zoning; loss or conversion of forest land; other environmental changes leading to farmland or forest land conversion)
- Biological Resources (conflicts with habitat conservation plans)
- Geology and Soils (landslide risk; soils incapable of supporting septic tanks)
- Hazards and Hazardous Materials (wildland fires)
- Population and Housing (displacement of people or housing)
- Transportation (CEQA Guidelines Section 15064.3, subdivision (b))

- Utilities and Service Systems (water, wastewater, stormwater, natural gas, and telecommunications infrastructure; wastewater treatment capacity)
- Wildfire (emergency response or evacuation plan; exposure of project occupants to wildfire pollutants; risk exposure)

Impact. No impacts would occur.

References. Section IV.C, Biological Resources, page IV.C-40; Section IV.F, Geology and Soils, pages IV.F-51, IV.F-54; Section IV.H, Hazards and Hazardous Materials, pages IV.H-48 through IV.H-49; Section IV.I, Land Use and Planning, page IV.I-14; Section IV.K, Transportation, page IV.K-17; Chapter VI, Other CEQA Considerations, pages VI-16 through VI-28; and Appendix A.1, Initial Study, of the Draft EIR, pages 16–55.

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

Findings. For the reasons discussed in the initial study and the Draft EIR, Metro finds that the Project would not result in impacts to one or more aspects of the resources as listed above.

9. CUMULATIVE IMPACTS

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

CEQA Guidelines Section 15065(a)(3) defines "cumulatively considerable" to mean that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. As explained more fully in Section III.B, Related Projects, of the Draft EIR, the cumulative analysis for the Project considers the 2020–2045 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), the Metro Vision 2028 Strategic Plan, Metro's 2020 Long Range Transportation Plan (LRTP), Metro's NextGen Bus Study, and the City's Sidewalk and Transit Amenity Program.

As discussed more fully in the Draft EIR and in the Initial Study, Appendix A.1 to the Draft EIR, Metro finds that cumulative impacts related to Aesthetics (light and glare), Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources (archaeological resources; human remains), Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Noise, Population

and Housing, Public Services, Transportation, Tribal Cultural Resources, Utilities and Service Systems, Recreation, or Wildfire would not be significant. Thus, these impacts are not discussed further below.

9.1 AESTHETICS

Impact. *Scenic Vistas and Visual Character:* As discussed above and in the Draft EIR, it is conservatively concluded that the proposed TCN Structures would result in significant impacts associated with views and visual character at Site Locations NFF-2, NFF-3, NFF-16 and NFF-21. Specifically, five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044) are near these TCN Structures. While the TCN structures would not physically impact the historical resources, the TCN structures would impede visibility of and thus detract from the character defining features of these five historical resources. To the extent that there are related projects that introduce additional visual features that distract from these historical resources, cumulative impacts associated with scenic views would be significant and the Project's contribution is considered to be cumulatively considerable.

Impact. *Consistency with Plan Policies and Regulations Regarding Scenic Quality:* As discussed above and in the Draft EIR, the Project would conflict with plan policies regarding scenic quality. To the extent that there are related projects that also result in inconsistencies with plan policies regarding scenic quality, cumulative impacts associated with scenic views would be significant, and the Project's contribution is considered to be cumulatively considerable.

Finding. For the reasons discussed above and in the Draft EIR, Metro finds that these cumulative aesthetic impacts would be significant and unavoidable.

9.2 CULTURAL RESOURCES

Impact. *Historical Resources:* Cumulative impacts may occur if the Project and related projects, as identified in Section III, Environmental Setting, of the Draft EIR, cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type or significant within the same context as the ones within the Study Area of the Project Site. A significant cumulative impact associated with the Project and related projects would occur if the combined impact of the Project and related projects would materially and adversely alter those physical characteristics that convey the historic significance of a historical resource and that justify its listing, or eligibility for listing, as a historical resource. Each of the related projects would be required to study and, if necessary, mitigate any impacts on the integrity or significance of surrounding historical resources. However, if the related projects would result in significant and unavoidable impacts on a historical resource that is the same property type or significant within the same context as

the ones within the Study Area of a Site Location, the Project's cumulative impact to historical resources would be potentially significant and unavoidable. Therefore, the Project is conservatively concluded to have a cumulatively considerable contribution to cumulative impacts to historical resources.

Finding. For the reasons discussed above and in the Draft EIR, Metro finds that these cumulative impacts to cultural resources would be significant and unavoidable.

9.3 LAND USE AND PLANNING

Impact. *Land Use Consistency:* As indicated in Section III, Environmental Setting, of the Draft EIR, cumulative growth is anticipated in the surrounding area of the Site Locations through 2025, the Project's anticipated buildout year. The related projects are comprised of transportation improvements that are included in the 2020-2045 RTP/SCS, Metro's 2020 Long Range Transportation Plan, the NextGen Bus Plan, and Sidewalk and Transit Amenity Program, which are encouraged by the land use policies evaluated above. Furthermore, the related projects and the Project would improve and expand traffic and transportation systems and maximize efficiency of a congested road network consistent with local and regional goals and objectives. As with the Project, the related projects would undergo consistency review with relevant land use policies and regulations by State and Local regulatory agencies and would be subject to CEQA review. Nonetheless, as discussed above, Site Locations NFF 2, NFF 3, NFF 16, NFF 21, FF 29 and FF 30 would result in significant impacts associated with consistency with land use policies. As such, to the extent that other related projects in the vicinity of these Site Locations also result in significant land use consistency impacts, the Project's contribution to land use impacts would be cumulatively considerable.

Finding. For the reasons discussed above and in the Draft EIR, Metro finds that these cumulative land use and planning impacts would be significant and unavoidable.

10. ALTERNATIVES AND MITIGATION MEASURES

CEQA provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" (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).)

In determining whether an alternative or mitigation measure is "feasible" under CEQA, an agency may consider whether that alternative or mitigation measure will promote the project's

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

10.1 ALTERNATIVES

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

The EIR examined three alternatives to the Project in detail, which include Alternative 1, the No Project Alternative; Alternative 2, Elimination of Impacts Relating to Historical Resources Alternative; and Alternative 3, Elimination of All Significant and Unavoidable Impacts Alternative.

Pursuant to CEQA Guidelines Section 15126.6(c), the EIR discussed additional alternatives that were considered for analysis but rejected as infeasible and explained the reasons for their rejection. The proposed Site Locations were chosen as they were the most feasible locations for construction and would not affect natural features such as trees and landscaping. The locations were also chosen based on their geographic spacing, and visibility and accessibility for commuters. Given the number of additional Metro properties located adjacent to freeways and major roadways, several alternative locations may be available that would also reduce these significant impacts to a less than significant level. Assuming that these alternative site locations would not be placed in proximity to historical resources and that the same mitigation measures for the Project would be implemented, these locations would result in impacts that would be similar to those of Alternative 2. In addition, Alternative 3 would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21, as well as eliminate or relocate Site Locations FF-29 and FF-30 outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan. Assuming that alternative site locations are available that would not be placed in proximity to historical resources and would not be located within the coastal area of the Palms–Mar Vista–Del Rey Community Plan, these locations would result in impacts that would be similar to those of Alternative 3. Therefore, an alternative location alternatives analysis is not further evaluated.

10.2 NO PROJECT ALTERNATIVE

The No Project Alternative, or Alternative 1, is required by CEQA Guidelines Section 15126.6 (e)(2) and assumes that the Project would not be implemented by Metro. The No Project Alternative allows decision-makers to compare the impacts of approving the Project with the impacts of not approving the Project. Under Alternative 1, no new permanent development would occur within the Site Locations, and the existing environment would be maintained. No existing static signs would be removed. Further, the proposed Zoning Ordinance for the TCN Program under the Project would not occur. Thus, the physical conditions of the Site Locations would generally remain as they are today. No new construction would occur. Further, no revenue would be generated from the Project to fund new and expanded transportation programs.

Although the No Project Alternative would avoid the Project's significant impacts, Metro finds that specific economic, legal, social, technological, and other considerations render the No Project Alternative identified in the EIR infeasible. (CEQA Guidelines Section 15091(a)(3)). Alternative 1 would not fulfill any of the Project Objectives. By pursuing the No Project Alternative, Metro would not increase its capacity for real-time data collection to improve traffic and transit management; expand its transportation public messaging network; improve public safety and emergency communications; maximize efficiency of congested road networks; generate revenue for both Metro and the City to fund transportation programs; implement Goal 4 of the Metro Vision 2028 Strategic Plan; reduce the overall square footage of existing static off-premise displays within the City; or locate TCN Structures in such a way as to efficiently relay information to commuters, without increasing distractions to motorists. For these reasons, Metro finds that the No Project Alternative is not feasible.

10.3 ALTERNATIVE 2

Alternative 2, the Elimination of Impacts Relating to Historical Resources Alternative, would eliminate TCN Structures at Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project. The remaining 52 TCN Structures would be proposed under this alternative. As with the Project, Alternative 2 would provide for an overall reduction in static displays (at least 2-to-1 square footage take-down ratio), throughout the City. Impacts to historical resources and the related aesthetic and land use impacts associated with Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 would be eliminated. As with the proposed Project, under Alternative 2, the City would establish a Zoning Ordinance that would provide a mechanism to review and approve the TCN Structures Citywide.

The purpose of the Project is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles.

Alternative 2 would not meet the basic objective of the Project to maximize advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would further Goal 2 of the Metro Vision 2028 Strategic Plan, by creating a funding source for programs to enhance experiences for all Metro users such as improving security and increasing customer satisfaction. By reducing the number of TCN Structures that could display advertisements, Alternative 2 would generate less advertising revenue. As a result, Alternative 2 would be less effective at fulfilling Goal 2 of Metro's Vision 2028 Strategic Plan because less funding would be available for programs that would enhance experiences for all Metro users.

Moreover, because the fundamental nature of the Project is to create a network of locations that can both collect transportation data and disseminate transportation-related information to the public, reducing the number of TCN locations will reduce the overall effectiveness of the Project. Alternative 2 would therefore be substantially less effective at fulfilling the objectives of the Project. Fewer TCN Site Locations would result in reduced real-time data collection to aid in signal timing, micro-transit data and Metro vanpool on demand services At the same time, Alternative 2 would result in fewer people having access to public safety notifications provided by the TCN Program. As a result, this Alternative would not serve some areas within the City as well as others.

Similarly, reducing TCN Site Locations would result in fewer opportunities to expand Metro's transportation public messaging network, reducing Metro's visibility and accessibility for all commuters compared to the Project. Alternative 2 would result in a network with less geographical coverage than the Project, which would ultimately impair the network's effectiveness at promoting travel alternatives to improve roadway safety and congestion.

In addition to the Project-specific objectives discussed above, Alternative 2 would be less effective at fulfilling Metro's policy objectives. The Metro's Vision 2028 Strategic Plan is the foundational strategic plan that establishes the mission, vision, and goals that will guide Metro's decision-making. It recognizes that population and economic growth in LA County are increasing travel demand, and that the current system is inadequately meeting the needs of its users due to inefficient use of the roadways. Thus, the Plan identifies multiple goals and initiatives that aim to achieve Metro's vision for future transportation in LA County.

The advertising revenue provided by the Project will fund: transportation projects and services in the City, including City transit lines or other public transit service; the acquisition of transit-related equipment, included buses, trucks, transit shelters and street furniture; sidewalks, curb

improvements, and beautification projects needed to improve conditions for public transit patrons; pedestrian safety improvements in the public right-of-way including speed humps, street resurfacing, traffic lane or pedestrian marking and signage, and acquisition of property to widen the public right-of-way to create safer traffic flow, bicycle lanes, and safer pedestrian routes. With less funding, generated by the Alternative, the Project would be less effective of fulfilling the goals of Metro's Vision 2028 Strategic Plan.

Reducing the number of TCN locations will also reduce the ability of Metro to satisfy policy objectives that could be served by increased data collection, network coverage, and transmission of information to the traveling public. Therefore, Alternative 2 would be less effective at meeting the following goals of Metro's Vision 2028 Strategic Plan:

1. Provide high-quality mobility options that enable people to spend less time traveling,

2. Deliver outstanding trip experiences for all users of the transportation system,

3. Enhance communities and lives through mobility and access to opportunity, and

4. Transform LA County through regional collaboration and national leadership.

While the Project would support the goals and initiatives identified in the Vision Plan, the reduction of TCN Structures in Alternative 2 would be less effective. For example, the Vision Plan anticipates that Metro will improve its transit assets, deliver positive trip experiences for transportation system users, and increase mobility and access. As discussed above, Alternative 2 will not maximize revenue for Metro and City to fund transportation improvements such as additional public transit services, new vehicles, new transit infrastructure, and aesthetic and safety improvements on public roadways. Additionally, the reduced effectiveness of Alternative 2 at collecting and distributing information, discussed above, would be less consistent with the Vision Plan's goals relating to improving the experiences of commuters and increasing visibility of and access to Metro's services.

In the Vision Plan, Metro also acknowledges that its "individual infrastructure projects will need to be coordinated and vetted in the context of Southern California Association of Governments (SCAG) Regional Transportation Plan . . . ." SCAG policies are directed towards developing regional land use patterns that reduce vehicle miles and improve the transportation system. The 2020-2045 RTP/SCS centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

For example, the RTP/SCS includes goals to improve travel experiences and the transportation system, increase travel efficiency, and reduce the climate and air quality impacts of transportation. As discussed above, the reduced revenue that would be generated by Alternative 2 would hinder the pursuit of transportation system improvements that are consistent with the

RTP/SCS. At the same time, the reduced ability of Alternative 2 to collect and share data would limit the opportunity for data-driven solutions to improve roadway efficiency and ultimately reduce VMT.

For these reasons, Metro finds that Alternative 2 is not feasible.

10.4 ALTERNATIVE 3

Alternative 3, the Elimination of All Significant and Unavoidable Impacts Alternative, would eliminate Site Locations NFF 2, NFF 3, NFF 16, and NFF 21, as well as eliminate or relocate FF-29 and FF-30 outside of the coastal area of the Palms – Mar Vista – Del Rey Community Plan. As with the Project, Alternative 3 would provide for an overall reduction in static displays throughout the City. The remaining 50 TCN Structures would be proposed under this alternative. As with the Project, Alternative 3 would provide for an overall reduction in static displays (2 to 1 square footage take-down ratio), throughout the City. Impacts to aesthetics, historic resources, and land use would be eliminated. As with the Project, under Alternative 3 the City would establish a Zoning Ordinance that would provide a mechanism to review and approve the TCN Structures Citywide.

Alternative 3 would include a reduced number of TCN Structures. Due to the reduction in TCN Structures, Alternative 3 would be less effective at meeting the Project's objectives and Metro's broader policy goals for the same reasons discussed above with respect to Alternative 2.

Alternative 3 would not meet the basic objective of the Project to maximize advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would further Goal 2 of the Metro Vision 2028 Strategic Plan, by creating a funding source for programs to enhance experiences for all Metro users such as improving security and increasing customer satisfaction. By reducing the number of TCN Structures that could display advertisements, Alternative 3 would generate less advertising revenue. As a result, Alternative 3 would be less effective at fulfilling Goal 2 of Metro's Vision 2028 Strategic Plan because less funding would be available for programs that would enhance experiences for all Metro users.

Moreover, because the fundamental nature of the Project is to create a network of locations that can both collect transportation data and disseminate transportation-related information to the public, reducing the number of TCN locations will reduce the overall effectiveness of the Project. Alternative 2 would therefore be substantially less effective at fulfilling the objectives of the Project. Fewer TCN Site Locations would result in reduced real-time data collection to aid in signal timing, micro-transit data and Metro vanpool on demand services At the same time, Alternative 3 would result in fewer people having access to public safety notifications provided by the TCN Program. As a result, this Alternative would not serve some areas within the City as well as others.

Similarly, reducing TCN Site Locations would result in fewer opportunities to expand Metro's transportation public messaging network, reducing Metro's visibility and accessibility for all commuters compared to the Project. Alternative 3 would result in a network with less geographical coverage than the Project, which would ultimately impair the network's effectiveness at promoting travel alternatives to improve roadway safety and congestion.

In addition to the Project-specific objectives discussed above, Alternative 3 would be less effective at fulfilling Metro's policy objectives. The Metro's Vision 2028 Strategic Plan is the foundational strategic plan that establishes the mission, vision, and goals that will guide Metro's decision-making. It recognizes that population and economic growth in LA County are increasing travel demand, and that the current system is inadequately meeting the needs of its users due to inefficient use of the roadways. Thus, the Plan identifies multiple goals and initiatives that aim to achieve Metro's vision for future transportation in LA County.

The advertising revenue provided by the Project will fund: transportation projects and services in the City, including City transit lines or other public transit service; the acquisition of transit-related equipment, included buses, trucks, transit shelters and street furniture; sidewalks, curb improvements, and beautification projects needed to improve conditions for public transit patrons; pedestrian safety improvements in the public right-of-way including speed humps, street resurfacing, traffic lane or pedestrian marking and signage, and acquisition of property to widen the public right-of-way to create safer traffic flow, bicycle lanes, and safer pedestrian routes. With less funding, generated by the Alternative, the Project would be less effective of fulfilling the goals of Metro's Vision 2028 Strategic Plan.

Reducing the number of TCN locations will also reduce the ability of Metro to satisfy policy objectives that could be served by increased data collection, network coverage, and transmission of information to the traveling public. Therefore, Alternative 3 would be less effective at meeting the following goals of Metro's Vision 2028 Strategic Plan:

5. Provide high-quality mobility options that enable people to spend less time traveling,

6. Deliver outstanding trip experiences for all users of the transportation system,

7. Enhance communities and lives through mobility and access to opportunity, and

8. Transform LA County through regional collaboration and national leadership.

While the Project would support the goals and initiatives identified in the Vision Plan, the reduction of TCN Structures in Alternative 3 would be less effective. For example, the Vision Plan anticipates that Metro will improve its transit assets, deliver positive trip experiences for transportation system users, and increase mobility and access. As discussed above, Alternative 3 will not maximize revenue for Metro and City to fund transportation improvements such as additional public transit services, new vehicles, new transit infrastructure, and aesthetic and

safety improvements on public roadways. Additionally, the reduced effectiveness of Alternative 3 at collecting and distributing information, discussed above, would be less consistent with the Vision Plan's goals relating to improving the experiences of commuters and increasing visibility of and access to Metro's services.

In the Vision Plan, Metro also acknowledges that its "individual infrastructure projects will need to be coordinated and vetted in the context of Southern California Association of Governments (SCAG) Regional Transportation Plan . . . ." SCAG policies are directed towards developing regional land use patterns that reduce vehicle miles and improve the transportation system. The 2020-2045 RTP/SCS centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

For example, the RTP/SCS includes goals to improve travel experiences and the transportation system, increase travel efficiency, and reduce the climate and air quality impacts of transportation. As discussed above, the reduced revenue that would be generated by Alternative 3 would hinder the pursuit of transportation system improvements that are consistent with the RTP/SCS. At the same time, the reduced ability of Alternative 3 to collect and share data would limit the opportunity for data-driven solutions to improve roadway efficiency and ultimately reduce VMT.

For these reasons, Metro finds that Alternative 3 is not feasible.

10.5 FINDINGS FOR MITIGATION MEASURES

The Metro Board has considered every mitigation measure recommended in the Draft EIR and included in the Mitigation Monitoring and Reporting Program (MMRP). Metro hereby binds itself to implement or, as appropriate, require implementation of these measures. The MMRP will be adopted concurrently with these Findings and will be effectuated through the process of constructing and implementing the Project. As described above in Section 5 of these Findings, Metro has rejected as infeasible other potential mitigation measures considered in the EIR.

Some comments on the Draft EIR suggested additional mitigation measures and/or modifications to the measures recommended in the Draft EIR. As shown in the Final EIR, Metro incorporated suggestions where appropriate or Metro explained why the suggested mitigation measures were not feasible and/or not superior to the mitigation measures identified in the Draft EIR. The Metro Board acknowledges staff for its careful consideration of these comments and agrees with the Final EIR in those instances when staff did not accept proposed language, and hereby ratifies, adopts, and incorporates the Final EIR's reasoning on these issues. As discussed in Section 6 of these Findings, with implementation of the mitigation measures set forth in the MMRP, the Project would not result in any significant and unavoidable impacts.

11. STATEMENT OF OVERRIDING CONSIDERATIONS

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

11.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

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

Aesthetics (scenic vistas). The Project would include TCN Structures at four Site Locations that would be near five historical resources. The TCN Structures would not physically impact these historical resources, but the TCN Structures would impede the visibility of the historical resources. Review of potential measures such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Thus, the Project would result in substantial adverse effects on scenic vistas, and the impacts would be significant and unavoidable.

Aesthetics (visual character). The proximity of four TCN Structures to five historical resources, mentioned above, would detract from the character defining features of those historical resources. Review of potential measures such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Thus, the Project would result in significant and unavoidable impacts associated with visual character.

Aesthetics (conflicts with plans). As mentioned above, the four TCN Structures that would impact historical resources would thus be inconsistent with several goals and policies of the Central City North, Central City, and North Hollywood–Valley Villa Community Plans regarding historical resources and associated visual impacts. In addition, the Project would also be inconsistent with Palms–Mar Vista–Dey Community Plan policies regarding placement of two other TCN Structures within the coastal area. Review of potential measures such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Thus, the Project would result in significant and unavoidable impacts due to its conflicts with plans related to historical resources and associated visual impacts.

Cultural Resources (historical resources). As mentioned above, four TCN Structures near five historical resources would result in a permanent and unavoidable effect on the integrity of the setting and feeling of those resources. Although these historical resources are within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, the TCN Structures at these Site Locations would likely detract from the character-defining features and affect the viewsheds of the resources. Review of potential measures such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. As such, impacts to historical resources from the Project would be significant and unavoidable.

Land Use and Planning. As mentioned above, four TCN Structures near five historical resources and two TCN Structures in the coastal area would conflict with goals and policies in local plans adopted for the purpose of avoiding or mitigating environmental effects. Specifically, four TCN Structures would conflict with a few goals and policies in the Central City North, Central City, North Hollywood–Valley Village Community Plans, as well as the General Plan's Conservation Element policies related to historical resources. In addition, two TCN Structures would conflict with the Palms–Mar Vista–Del Rey Community Plan policy regarding placement of off-site advertising within coastal areas. Review of potential measures such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. As such, impacts related to conflicts with applicable plans, policies, and regulations would be significant and unavoidable.

11.2 DETERMINATION

Metro concludes that the overall benefits of the Project outweigh the significant and unavoidable impacts discussed above, and that the significant and unavoidable impacts are thus considered acceptable.

As provided in Section II, Project Description, of the Draft EIR, the underlying purpose of the Project is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles. The Project would result in the following benefits:

- Incorporate features for real-time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services;
- Geographically space the multifunctional TCN Structures to expand Metro's transportation public messaging network and ability to broadcast information to commuters in a variety of ways to further increase Metro's visibility and accessibility for all commuters;

- Improve public safety by notifying the public of roadway improvements, road hazards, Earthquake Early Warning System notifications, Amber Alerts, and emergency situations;
- Maximize efficiency of the congested road network by promoting public awareness of travel alternatives based on geography and time constraints such as alternative routes, carpooling alternatives, and public transportation opportunities;
- Maximize advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would further Goal 2 of the Metro Vision 2028 Strategic Plan, by creating a funding source for programs to enhance experiences for all Metro users such as improving security and increasing customer satisfaction;
- Implement Goal 4 of the Metro Vision 2028 Strategic Plan by creating an avenue for regional collaboration and comprehensive, timely, and real-time information sharing across government agencies to regionally improve traffic and transportation systems;
- Reduce overall square footage of existing static off-premise displays within the City of Los Angeles; and
- Locate the TCN Structures at sites, elevations, and angles that would not increase distraction to motorists while still efficiently relaying information to commuters.

By providing these benefits, the Project will help to fulfill transportation related goals and policies set forth in the Community Plans, the General Plan Framework Element, SCAG's 2020–2045 RTP/SCS, the Mobility Plan, and Metro's Vision Plan.

The TCN Program would enable Metro to quickly collect a large quantity of real time travel and traffic data, while also allowing Metro to more easily process the data and transmit information to other transportation agencies and to commuters. The TCN Structures would also incorporate real time data to aid in traffic signal timing and Metro vanpool on-demand services. Additionally, the TCN Program would enable the collection of event congestion data for LAX, Dodger Stadium, the Hollywood Bowl, and other large venues, including travel demand management services for the 2028 Olympic and Paralympic Games, and would also provide information regarding available parking spaces in park-and-ride lots.

The TCN Program would create advertising revenue for both Metro and the City, expanding the agencies' funding for transportation programs. The Project is expected to generate $300-$500 million over the initial 20-year term, which would fund new and expanded transportation programs that would improve the performance, efficiency, and reliability of existing and future bus and transit services while also decreasing VMT, reducing traffic congestion, and improving air quality.

In addition to adding TCN Structures, the Project would include the removal of static billboards. Communities, particularly underserved communities and communities of color, have long struggled with the blight of static billboards. The Project would reduce blight and readjust this imbalance by removing a proportionately higher number of static displays from properties within Equity Focus Communities (EFCs) and adding a proportionately lower number of TCN Structures in EFCs.