VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(c) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant and unavoidable impacts that cannot be feasibly mitigated with regard to aesthetics, historical resources, and land use. Refer to Section V. Alternatives for an analysis of alternatives that have been proposed to eliminate these impacts.

a. Aesthetics

As discussed in Section IV.A, Aesthetics, and in Section IV.D, Cultural Resources, of this Draft EIR, the proposed TCN Structures at Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 are located in close proximity to 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).

With regard to scenic views, while the TCN structures would not physically impact these historical resources, the TCN structures would impede visibility of and thus detract from the character defining features of these five historical resources. While these historical resources are located within urban areas where public views of these historical resources are affected by existing infrastructure and buildings, for purposes of providing a conservative analysis, impacts on the scenic vistas of these historical resources are concluded to be significant and unavoidable as 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 impacts would be significant and unavoidable.

With regard to visual character 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, as discussed above. Thus, impacts associated with visual character would be significant.

As shown in Table 6 in Appendix I of this 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).

Overall, based on the above, the Project would conflict with the applicable goals, objectives, and policies set forth in the Community Plans with regard to scenic quality.

Review of potential measures to reduce the Project's significant and unavoidable impacts, such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Rather, the primary way to substantially reduce these impacts would be to eliminate the Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 or, with regard to Site Locations FF-29 and FF-30 in particular, to eliminate or relocate them out of the Coastal Zone. Refer to Section V. Alternatives for a discussion of alternatives that eliminate or relocate the Site Locations in order to substantially reduce the Project's significant and unavoidable aesthetics impacts related to scenic views, visual character and consistency with plan policies regarding aesthetics.

b. Historical Resources

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). As discussed in detail in Section IV.D Cultural Resources of this Draft EIR, 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, impacts to historical resources as a result of the Project would

be significant and unavoidable. Review of potential measures to reduce the Project's significant and unavoidable impacts, such as modification to the size and height of the signs was considered. However, such modifications would not materially reduce these impacts. Rather, the primary way to substantially reduce these impacts would be to eliminate the Site Locations. Refer to Section V. Alternatives for a discussion of alternatives that eliminate the Site Locations in order to substantially reduce the Project's significant and unavoidable impacts related to historical resources.

c. Land Use

As discussed in Section IV.I, Land Use, of this Draft EIR, the Project would not conflict with the majority 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, impacts related to conflicts with applicable plans, policies, and regulations would be significant. 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. Rather, the primary way to mitigate these impacts would be to eliminate or relocate the Site Location(s). Refer to Section V. Alternatives for a discussion of Alternative 3 that would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21 and eliminate or relocate Site Locations FF-29, and FF-30 in order to eliminate these land use plan inconsistency impacts.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant and Unavoidable Impacts

In addition to identification of a project's significant and unavoidable impacts, CEQA Guidelines Section 15126.2(c) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in the underlying

purpose of the Project and the associated list of project objectives included in Section II, Project Description, of this Draft EIR.

As provided in Section II, Project Description, of this 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. This underlying purpose and associated objectives are closely tied to the goals and objectives 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.

As discussed in Section IV.I, Land Use and Planning, of this Draft EIR, with regard to the Community Plans, the Project would be consistent with several of the Community Plans policies related to enhancement of and compatibility with adjacent development. The TCN Structures would be strategically located on Metro-owned property in the vicinity of Metro operations including existing transit stops, parking areas, and depots, as well as within key geographic locations to assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. The Project would further create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. Additionally, the Project would be consistent with several of the Community Plans goals focused on creating a well maintained, safe, efficient freeway and street network. The Project would also promote multi-modal transportation and safety through a system of freeways, and streets that provides a circulation system which supports existing, approved, and planned land uses while maintaining a desired level service at intersections. Specifically, the TCN Structures would be equipped with Metro's RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. As acknowledged above, the Project would conflict with goals of several of the Community Plans with regard to historical resources and related aesthetic resources impacts and with with Palms – Mar Vista – Del Rey Community Plan with regard to placement of off-site commercial signs within the coastal area.

With regard to the Framework Element, the Project would support and would be consistent with the Land Use Chapter as it would contribute to or not conflict with the City's goal for a physically balanced distribution of land uses that facilitates conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, and assurance of environmental justice and a healthful living environment. In particular, the TCN Program would provide a network of digital displays strategically located throughout the City and would not change the distribution of land uses. Further, the TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that would support a decrease in VMT, reduction of traffic congestion, and improvement of air quality. The Project would also further the City's objective to work with developers and Metro to incorporate public-serving uses and services in structures located in proximity to transit stations. The TCN Program would assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. The TCN Structures would also incorporate real time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter. As discussed in Table 4 of Appendix I of this Draft EIR, the Project would also not conflict with the Urban Form and Neighborhood Design Chapter, Open Space and Conservation Chapter, Economic Development Chapter and Infrastructure and Public Services Chapter of the Framework Element.

With regard to the Health and Wellness Element, the Project would support applicable goals and objectives therein, including reducing air pollution from stationary and mobile sources and reducing per capita greenhouse gas emissions. Specifically, the Project would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that promote a decrease in VMT, reduction of traffic congestion, and improvement of air quality.

With regard to the Mobility Plan, therein, the Project would support Policy 2.5 and Policy 3.4 by improving the performance, efficiency, and reliability of existing and future bus and transit service for all residents, workers, and visitors by developing a TCN Program that would create advertising revenue to be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passengers experience by helping to facilitate transit signal priority and bus wi-fi and efficiently relay bus arrival time information to riders by displaying public transit information on the TCN Structures. The Project would also support Policy 3.5 regarding maximizing multi-modal connectivity and access for transit riders and Policy 3.6 regarding promoting Union Station as a regional transportation hub. Further, the Project would be consistent with Policy 3.7 by improving transit access and service to major regional

destinations, job centers, and inter-modal facilities as the TCN Structures would be equipped with Metro's RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies, including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements and during emergency events. Specifically, the TCN Program would support 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. In addition, the Project would support Objective 4.5 regarding coordinating with regional transportation agencies; Policy 4.6 regarding utilizing data to prioritize transportation projects; Policy 4.7 regarding collecting data; Policy 4.8 regarding encouraging TDM strategies; Policy 5.2 regarding supporting a reduction in VMT; Policy 4.11 regarding operation of a cohesive regional mobility system; and Policy 4.14 regarding delivering information through signage and digital platforms. However, as discussed in Table 5 of Appendix I Site Locations NFF-7 and NFF-12 would be inconsistent with Policy 2.16 as these Site Locations would locate off-site outdoor advertising adjacent to two roadway segments that have been designated by the Mobility Plan Appendix B Guidelines as scenic highways. Overall, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect..

With regard to the LA Metro 2028 Vision Plan, the Project would support Initiative 1.2, to improve the County's overall transit network and assets, as well Goal 2, to deliver outstanding trip experiences for all users of the transportation systems. Specifically, the Project would integrate Metro's Regional Integration of Intelligent Transportation Systems (RIITS), which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. The TCN Program would also assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints. Further, the TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passenger experience by helping to facilitate transit signal priority and bus wi-fi as well as efficiently relay bus arrival time information to riders.

With regard to the 2020–2045 RTP/SCS, the Project would be generally consistent with the whole of applicable goals set forth in the 2020-2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020-2045 RTP/SCS including increasing the travel choices within the transportation system by creating advertising that would be utilized by both Metro and the City to fund new and expanded transportation programs. The TCN Structures would incorporate real time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services. The TCN Program would also improve bus passenger experience by helping to facilitate transit signal priority and bus wi-fi as well as efficiently relay bus arrival time information to riders. Further, the Project would leverage new transportation technologies and data-driven solutions that result in more efficient travel through integration of Metro's RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. The TCN Program would also assist Metro's transportation public messaging and ability to broadcast information to commuters in a variety of ways to increase public safety, maximize efficiency of the congested road network, and promote public awareness of travel alternatives based on geography and time constraints.

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(d) provides that an EIR must evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(d), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal

effects on landfills; (2) water; and (3) energy resources for electricity. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

Construction of the Project would include the consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

The Project's potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A to this Draft EIR. As discussed therein, 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. Additionally, 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. In addition, 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. Overall, the Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials, such as aggregate materials and plastics, would be reduced and the Project would not result in significant impacts regarding solid waste.

b. Water

Consumption of water during construction and operation of the Project is addressed in the Initial Study prepared for the Project, which is included as Appendix A to this Draft EIR. As evaluated therein, The Project would involve limited use of water during construction and operation (associated with maintenance). Thus, as evaluated in the Initial Study, included as Appendix A to this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in significant impacts related to water supply.

c. Energy Consumption

[Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.E, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. The

electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity demand would be within the anticipated service capabilities of LADWP. In addition, as discussed in Section IV.E, Energy, of this Draft EIR, the Project would comply with all applicable energy conservation policies and plans, including the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal and the 2020–2045 RTP/SCS. Applicable requirements of Title 24, the CALGreen Code, and the Green Building Code that would be implemented by the Project include specific lighting requirements to conserve energy. In addition, compliance with Title 24 standards would ensure the use of the most energy efficient and energy conserving technologies and construction practices.

Overall, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.E, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR. As evaluated therein, operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used for maintenance of TCN Structures, including cleaning products. 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. Construction of the Project would also involve the temporary use of potentially hazardous materials, including hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations.

Additionally, any asbestos or lead based paint encountered during demolition and construction would be handled and disposed of according to applicable federal, state, and local regulations and any contaminated soil would be handled and disposed of according to the Soil Management Plan to be prepared for the Project, as detailed in Mitigation Measure HAZ-MM-1. Furthermore, soil/vapor sampling and testing of soil samples would be obtained during the site location-specific, design-level geologic and geotechnical investigation, as detailed in Mitigation Measure HAZ-MM-2, and a geophysical investigation would be conducted to clear the construction area of buried utilities and to identify buried substructures, specifically oil wells and USTS, as detailed in Mitigation Measure HAZ-MM-3.

Therefore, any associated risk due to the use or disposal of hazardous materials would be reduced to a less-than-significant level through implementation of Mitigation Measures HAZ-MM-1 through HAZ-MM-3. As such, it is not expected that the Project would cause irreversible damage from environmental hazards.

e. Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited slowly renewable and non-renewable resources, which would limit the availability of these resources for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may burden existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA

Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project does not propose a housing component. As such, the Project would not directly induce a new residential population which would contribute to population growth in the vicinity of the Site Locations or local Community Plan areas.

b. Employment

The Project would have the potential to generate indirect population growth in the vicinity of the Site Locations as a result of the employment opportunities generated by the Project. During construction, the Project would create temporary construction-related jobs. However, 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. The Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. Project-related construction workers would not be anticipated to relocate their household's permanent place of residence as a consequence of working on the Project and, therefore, no new permanent residents are expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

As discussed in the Initial Study included as Appendix A to this Draft EIR, the Project does not propose the development of uses that would generate new permanent employees. While the TCN Program could result in additional employees associated with operation of the Project, the additional employees would not be substantial in number and would likely already live in the region. As such, Project operation would not induce substantial population growth.

c. Utility Infrastructure Improvements

The area surrounding the Site Locations are generally already developed with urban uses, and the Project would not remove impediments to growth. The Site Locations are located within areas that are currently served by existing utilities and infrastructure. As discussed in Section IV.M, Utilities–Electric Power Infrastructure, of this Draft EIR, while the Project would primarily require minor trenching to connect to existing electrical LADWP connection points, such improvements would be limited to serving Project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

d. Conclusion

Overall, the Project would be consistent with the growth forecast for SCAG's City of Los Angeles Subregion and would be consistent with the regional policy to efficiently utilize existing infrastructure. In addition, the Project would not require any major roadway expansions or open any large undeveloped areas for new use. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project were evaluated. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

a. Biological Resources

Mitigation Measures BIO-MM-1 through BIO-MM-4 are included in Section IV.C, Biological Resources, of this Draft EIR to address potential Project impacts on biological resources. Specifically, Mitigation Measure BIO-MM-1, which specifies general biological resource protection measures during construction, requires the designation of a project biologist prior to the commencement of construction who will review final plans, designate areas that need temporary fencing, monitor construction barriers or exclusion fencing, halt work as necessary to protect biological resources, and notify Metro of the sighting of a federally or State-listed species. Mitigation Measure BIO-MM-1 also requires preconstruction training for all Project personnel and surveys for special-status species and invasive weeds. Lastly, Mitigation Measure also BIO-MM-1 requires vehicle refueling and maintenance to occur in upland areas, regular leak inspections, and prompt cleanup of fuel leaks in accordance with applicable local, State, and federal requirements.

Mitigation Measure BIO-MM-2, requires preconstruction surveys for nesting birds. Mitigation Measure BIO-MM-3, which pertains to Site Locations FF-29 and FF-30 requires three separate preconstruction surveys no more than seven days prior to vegetation removal, should construction activities occur during each respective nesting season; and

the halting of all construction activities should certain species be detected within 500 feet of the Site Location.

Lastly, Mitigation Measure BIO-MM-4 requires preconstruction surveys for potential bat habitat. If suitable habitat is determined to be present, additional surveys would occur during bat maternity season (May 1st through October 1st), prior to construction, to assess the potential for bat roosting and bat maternity roosting. If a roost is detected and it is determined that Project construction would result in direct impacts on roosting bats, a bat management plan would be prepared. Temporary eviction and exclusion devices would be installed under the supervision of a qualified and permitted bat biologist, if recommended. If a roost is detected but would only be subject to indirect impacts, all work conducted under the occupied roost would only take place during the day, if feasible. If this is not feasible, lighting and noise will be directed away from night roosting and foraging areas.

Overall, implementation of BIO-MM-1 through BIO-MM-4 would be beneficial in reducing Project impacts on biological resources and would not result in significant adverse secondary impacts.

b. Cultural Resources

Mitigation Measure CUL-MM-1 is included in Section IV.D, Cultural Resources, of this Draft EIR to address potential Project impacts on archaeological resources. Specifically, Mitigation Measure CUL-MM-1 requires that a principal archaeologist 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 would include 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, and implementation of a Worker Environmental Awareness Program (WEAP) training program for construction workers involved in ground disturbance activities. This mitigation measure could potentially require targeted excavations to unearth additional archaeological resources, if such is the recommendation of the principal archaeologist. These targeted excavations would not result in any impacts not already addressed for construction. Therefore, implementation of CUL-MM-1 would be beneficial in reducing Project impacts on archaeological resources, if any, and would not result in significant adverse secondary impacts.

c. Geology and Soils

Mitigation Measure GEO-MM-1 is included in Section IV.F, Geology and Soils, of this Draft EIR to address potential Project impacts on paleontological resources. This mitigation measure requires that a qualified paleontologist be retained prior to ground

disturbance activities associated with the Project 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. This mitigation measure could potentially require excavations to unearth additional paleontological resources, if recommended by the paleontologist. These targeted excavations would not result in any impacts not already addressed for construction. Therefore, implementation of GEO-MM-1 would be beneficial in reducing Project impacts on paleontological resources, if any, and would not result in significant adverse secondary impacts.

d. Hazards and Hazardous Materials

Section IV.H, Hazards and Hazardous Materials, of this Draft EIR incudes Mitigation Measure HAZ-MM-1 through HAZ-MM-3 to address potential hazards during construction. Mitigation Measure HAZ-MM-1 provides for the implementation of a Soil Management Plan that includes protocols regarding precautions, observations, and evaluations of soil conditions to be implemented during ground disturbance activities. The protocols include precautions during earthwork activities within the Site Locations, implementation of a Health and Safety Plan, measures for sampling and stockpiling of suspect soils, compliance with regulations regarding the safety of construction workers, and provisions for below-grade structures such as storm water infrastructure that have the potential to be encountered during construction. Mitigation Measure HAZ-MM-2 would require soil/vapor sampling and testing of soil samples at Site Locations FF 1, FF 2, FF 3, FF 4, FF 05, 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. Lastly, Mitigation Measure HAZ-MM-3 would require the conduction of a geophysical investigation at Site Locations FF 4, NFF 3, NFF 18, and NFF 21 to clear the construction area of buried utilities and to identify buried substructures, specifically oil wells and USTs. These measures would be implemented in accordance with applicable regulatory requirements and regulatory oversight. As such, these measures would not include physical improvements that would result in adverse secondary impacts.

e. Noise

Mitigation Measures NOI-MM-1 through NOI-MM-4 are included in Section IV.J, Noise, of this Draft EIR to address potential Project impacts with regard to noise and vibration. Mitigation Measure NOI-MM-1 requires temporary sound barriers to be installed during construction at specified Site Locations. At plan check, building plans would include documentation prepared by a noise consultant verifying compliance with this measure. Additionally, Mitigation Measure NOI-MM-3 requires a temporary noise barrier to be installed 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 installation of the sound barriers would include limited construction activities

associated with installation. Furthermore, the sound barriers would reduce the Project's noise impacts from construction, and the temporary sound barriers would be removed upon completion of construction. As such, implementation of these mitigation measure would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-2 requires that construction for Site Location NFF-20 be completed prior to occupation of the adjacent future residential building (receptor R12B). Alternatively, construction equipment for the installation of the Site Location NFF-20 shall be limited to a maximum 75 dBA (Leq) at 50 feet from the equipment. Implementation of this mitigation measure would avoid potential noise impacts upon residents that would be located adjacent to Site Location NFF-20. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Lastly, Mitigation Measure NOI-MM-4 requires that the use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) be limited to a minimum of 80 feet away from the existing residences near proposed Site Location FF-33 (receptor 28) and the future residences near proposed Site Location NFF-20 (receptor 12B), if these residences are constructed and occupied at the time Project construction activities occurs. Implementation of this mitigation measure would reduce potential vibration impacts upon residents near Site Locations NFF-20 and FF-33. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

f. Tribal Cultural Resources

Mitigation Measures TRC-MM-1 through TRC-MM-3 are included in Section IV.L, Tribal Cultural Resources, of this Draft EIR to address potential Project impacts with regard to tribal cultural resources. Prior to any ground-disturbing activities on the Site Locations associated with the Project Area, Mitigation Measure TCR-MM-1 would require the retention of a tribal consultant and Mitigation Measure TCR-MM-2 would require the development of a Tribal Cultural Resource Mitigation and Monitoring Program (TCR MMP). The TCR MMP would 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. This mitigation measure could potentially require targeted excavations to unearth additional tribal cultural resources if such is the recommendation of the qualified archaeologist in consultation with the tribal monitor. These targeted excavations would not result in any impacts not already addressed for construction.

Lastly, Mitigation Measure TCR-MM-3 would require the development of a treatment plan 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 would outline data recovery procedures to be followed and would require controlled

archaeological excavation within the first eight feet (ft) at all Site Locations proposed to be located within known tribal cultural resources. These targeted excavations would not result in any impacts not already addressed for construction.

Therefore, based on the discussion above, implementation of TCR-MM-1 through TCR-MM-3 would be beneficial in reducing potential Project impacts on tribal cultural resources and would not result in significant adverse secondary impacts.

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 states that an EIR must contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. Metro determined through the Initial Study that the Project would not have the potential to cause significant impacts related to scenic resources; agriculture and forestry resources; odors; conflicts with local policies or ordinances protecting biological resources; conflicts with habitat conservation plans; human remains; soils incapable of supporting septic tanks; routine transport, use, or disposal of hazardous materials; airport or airstrip-related hazards; an emergency response plan or emergency evacuation plan; wildland fires; hydrology and water quality; physical division of an established community; mineral resources; airport or airstrip-related noise; population and housing; public services; recreation; vehicle miles traveled; inadequate emergency access; water infrastructure and supplies; wastewater infrastructure and treatment capacity; stormwater drainage; natural gas infrastructure; telecommunications infrastructure; solid waste; and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics (Scenic Resources)

The Site Locations are located within property owned and operated by Metro along freeways and major streets within the City. The majority 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, as concluded in the Initial Study, impacts related to scenic resources within a state scenic highway would be less than significant.

b. Agriculture and Forestry Resources

The Project is located in urbanized areas of the City. The Site Locations for the TCN Structures are used primarily for Metro operations and are generally zoned and designated as commercial, public facilities, and manufacturing uses. No agricultural uses or operations occur within or in the vicinity of the Site Locations. Therefore, as concluded in the Initial Study, no impacts to agriculture and forestry resources would occur.

c. Air Quality (Odors)

No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses.

In addition, construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations. In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health or safety of any such persons or the public; or which cause, or have a natural tendency to cause, injury or damage to business or property. Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

Based on the above, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, as concluded in the Initial Study, Project impacts related to odors would be less than significant.

d. Biological Resources (Conflicts With Local Policies or Ordinances Protecting Biological Resources; Conflicts With Habitat Conservation Plans)

With regard to local policies or ordinances protecting biological resources, 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, as concluded in the Initial Study, the Project would not conflict with any local policies or ordinances protecting biological resources.

With regard to habitat conservation plans, the Site Locations for the TCN Structures are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. No Habitat Conservation Plans or Natural Community Conservation Plans apply to the City. Therefore, as concluded in the Initial Study, no impact with regard to conflicts with habitat conservation plans would occur

e. Cultural Resources (Human Remains)

The Site Locations 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. Therefore, as concluded in the Initial Study, Project impacts related to human remains would be less than significant.

f. Geology and Soils (Soils Capable of Supporting Septic Tanks)

The Project would not require the disposal of wastewater and therefore, would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, as concluded in the Initial Study, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

g. Hazards and Hazardous Materials (Routine Transport, Use, or Disposal of Hazardous Materials; Airport or Airstrip-Related Hazards; Emergency Response Plan or Emergency Evacuation Plan; Wildland Fires)

With regard to the routine transport, use, or disposal of hazardous materials, all potentially hazardous materials to be used during construction would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction. Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used for maintenance of TCN Structures, including cleaning products. 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, as concluded in the Initial Study, impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant.

With regard to airports, 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 the vicinity of the Los Angeles International Airport (LAX), Santa Monica Airport, Hollywood Burbank Airport, and Whiteman Airport. However, the Project does not include any occupiable structures that would result in the permanent exposure of people to a safety hazard related to proximity to an airport. While construction workers may be exposed to airport-related noise for those Site Locations within two miles of an airport, such noise levels would be intermittent and limited to the short duration of construction activities. Therefore, as concluded in the Initial Study, impacts would be less than significant.

With regard to emergency response and evacuation, the Project would be located near several disaster routes designated by the City's Safety Element. While it is expected that the majority of construction activities for the Project would be confined to the

immediate vicinity of the Site Locations, limited offsite construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. If lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to 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 as set forth in California Vehicle Code (CVC) 21806(a)(1). Furthermore, one of the primary benefits of the TCN Program is to enhance communication during emergency events through utilization of the digital displays on each TCN Structure. Therefore, as concluded in the Initial Study, impacts related to the implementation of the City's emergency response plan would be less than significant.

With regard to wildland fires, the proposed TCN structures are located in urbanized areas. In addition, the Project would not involve the construction of occupiable structures or attract people to the areas of improvement. Therefore, as concluded in the Initial Study, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impact would occur.

h. Hydrology and Water Quality

(1) Surface and Groundwater Quality

During Project construction, stormwater runoff could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. On site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff. However, during construction, Best Management Practices (BMPs) would be implemented to control stormwater runoff and address pollutants during construction. In addition, Project construction activities would occur in accordance with the Los Angeles County Department of Public Works Construction Site BMP Manual, LADBS Guidelines for Stormwater Infiltration, County of Los Angeles LID Requirements and Standard Plan S-480-0, and City grading permit regulations (Chapter IX, Division 70 of the LAMC). These BMPs and regulatory requirements would include erosion control measures, and other measures to ensure that pollutants and sediments are not conveyed into the storm drain system.

As discussed in the Initial Study, construction of each TCN Structure would include the use of a drill rig that would drill a hole up to 50 feet in depth and approximately 10 feet by 10 feet in width. Historical groundwater levels vary according to the location of each TCN Structure. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements related to construction and discharges from dewatering operations pursuant to the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from

Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, LARWQCB Order No. R4-2018-0125 (“Dewatering Permit"). In addition, during construction, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners could be used. Such use would occur in accordance with manufacturers’ specifications and instructions and regulatory requirements.

With the implementation of regulatory compliance requirements including BMPs, the Project 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.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used for maintenance of TCN Structures, including cleaning products, and paints. All hazardous materials used at the Site Locations during operation would be used in accordance with manufacturers specifications and regulatory requirements.

Therefore, as concluded in the Initial Study, construction and operation of 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.

(2) Groundwater Recharge

Due to the limited size of the holes that would be drilled together with 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. Therefore, as concluded in the Initial Study, impacts with regard to groundwater recharge during construction and operation would be less than significant.

(3) 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 to approximately 93 cubic yards of export per TCN Structure, for a total of approximately 5,208 cubic yards of export for construction of up to 56 TCN Structures. 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, as concluded in the Initial Study, impacts with regard to erosion and siltation as well as runoff during construction and operation would be less than significant.

(4) Flooding

With regard to flood flows, the TCN Structures would be constructed on an approximately 10-foot by 10-foot area which would not result in an impervious area that would be large enough to substantially impede, alter or redirect flood flows. Therefore, as concluded in the Initial Study, impacts with regard to the substantial alteration of existing drainage patterns would be less than significant.

With regard to flood hazard and tsunami zones, some of the Site Locations would be within flood hazard and tsunami zones as mapped by the City. During construction, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners could be used. Such use would occur in accordance with manufacturers' specifications and instructions and regulatory requirements. As discussed above, any hazardous materials associated with operation of the TCN Structures would be limited to those required to maintain the structures such as cleaning products and paints. These substances would be used in accordance with manufacturers specifications and regulatory requirements and these substances would not be stored at the Site Locations. Therefore, as concluded in the Initial Study, 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

(5) Water Quality Control Plan or Sustainable Groundwater Management Plan

As discussed above, 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, as also discussed above, the maximum depth of 50 feet together with the small diameter of the hole required for the TCN Structure would not be of a size that would 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, as concluded in the Initial Study, impacts with regard to a water quality control plan or a sustainable groundwater management plan would be less than significant.

i. Land Use and Planning (Physical Division of an Established Community)

The TCN Structures would be constructed on an approximately 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. As such, the Project would not physically divide an established community. No impacts related to the physical division of an established community would occur. Therefore, as concluded in the Initial Study, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant.

j. Mineral Resources

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. Therefore, as concluded in the Initial Study, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur.

k. Noise (Airport and Airstrip)

Some of the Site Locations would be within the vicinity of LAX, Santa Monica Airport, Hollywood Burbank Airport, and Whiteman Airport. However, the Project does not include any occupiable structures that would result in the permanent exposure of people to a safety hazard related to proximity to an airport. While construction workers may be

exposed to airport-related noise for those Site Locations within two miles of an airport, such noise levels would be intermittent and limited to the short duration of construction activities. Therefore, as concluded in the Initial Study, impacts related to airport noise would be less than significant.

l. Population and Housing

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.

With regard to operation, while the TCN Program could result in additional employees associated with operation of the Project, the additional employees would not be substantial in number and would likely already live in the region. As such, Project operation would not induce substantial unplanned population growth.

Based on the above, the Project would not induce substantial population growth either directly or indirectly. As concluded in the Initial Study, impacts with regard to substantial population growth would be less than significant. Furthermore, no housing or other occupiable structures currently exist at the Site Locations. As such, the Project would not displace any existing persons or housing or require the construction of replacement housing elsewhere. Therefore, as concluded in the Initial Study, no impacts related to displacement of people or housing would occur.

m. Public Services

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, as concluded in the Initial Study, impacts associated with public services would be less than significant.

n. Recreation

As discussed above, 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. In addition, the Project does not include recreational facilities. Furthermore, the Project does not include any residential uses that would result in the increased use of existing recreational facilities. As such, the Project would not necessitate construction of new recreational facilities. Therefore, as concluded in the Initial Study, impacts related to parks and recreational facilities would be less than significant.

o. Transportation (Vehicle Miles Traveled; Inadequate Emergency Access)

With regard to Vehicle Miles Traveled (VMT), operation of the Project would not result in new uses that would generate vehicle miles traveled on a daily basis. Any vehicle trips and associated VMT resulting from maintenance activities would be infrequent. Additionally, in accordance with LADOT's Transportation Assessment Guidelines (TAG), construction worker trips are not evaluated under CEQA. Therefore, as concluded in the Initial Study, the Project would have no impact with regard to VMT.

With regard to emergency access, while it is expected that the majority of construction activities for the Project would be confined to the Site Locations, limited offsite 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. With regard to operation, the Project would not alter the existing traffic patterns. Furthermore, one of the primary benefits of the TCN Program is to provide communication to travelers during emergency events. Therefore, as concluded in the Initial Study, the Project would not result in inadequate emergency access to the Site

Locations or surrounding uses, and impacts regarding emergency access would be less than significant.

p. Utilities and Service Systems (Water, Wastewater, Stormwater, Natural Gas, and Telecommunications Infrastructure; Water Supply; Wastewater Treatment Capacity; Solid Waste)

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, as concluded in the Initial Study, 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 the construction or relocation of which could cause significant environmental effects.

With regard to water supply, the Project would have a minimal demand for water during construction and during operation (related to maintenance). Therefore, as concluded in the Initial Study, the Project would not result in impacts associated with water supply.

With regard to wastewater treatment capacity, the Project would not generate wastewater during construction or operation, as discussed above. Therefore, as concluded in the Initial Study, the Project would not result in impacts to wastewater treatment capacity.

With regard to solid waste, 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. Additionally, 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, as discussed above, 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. In addition, 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, as concluded in the Initial Study, impacts related to solid waste would be less than significant.

q. Wildfire

The Project would not impede public access to emergency/disaster routes and would not interfere with an adopted emergency response plan or emergency evacuation plan, including the Los Angeles County Operational Area Emergency Response Plan. While it is expected that the majority of construction activities for the Project would be confined to the Site Locations, limited offsite 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, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to 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 as set forth in California Vehicle Code (CVC) 21806(a)(1). Therefore, as concluded in the Initial Study, no impacts with regard to an adopted emergency response plan or emergency evacuation plan would occur.

With regard to the exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, the Project does not include a land use development with occupants (e.g., residents, employees or visitors). Thus, there is no potential for the Proposed Project to expose people to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Therefore, as concluded in the Initial Study, no impacts with regard to the exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would occur.

With regard to the exacerbation of fire risk as a result of installation or maintenance of associated infrastructure, the majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. The Project would require the installation of conduit lines to connect to LADWP provided electricity, which would be installed underground. Therefore, as concluded in the Initial Study, impacts with regard to the exacerbation of fire risk as a result of installation or maintenance of associated infrastructure would be less than significant.

With regard to risk exposure as it relates to runoff, post-fire slope instability, or drainage changes, the majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. The Project would not involve the construction of occupiable structures or attract people to the areas of improvement.

Therefore, as concluded in the Initial Study, no impacts with regard to exposing people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would occur.