3.18 Wildfire Impacts

This section is based on the *Sepulveda Transit Corridor Project Safety and Security Technical Report*, incorporated into this DEIR as Appendix R.

3.18.1 Regulatory and Policy Framework

3.18.1.1 Federal

National Fire Protection Association Codes and Standards

The National Fire Protection Association (NFPA) develops, publishes, and disseminates more than 300 consensus codes and standards intended to minimize the possibility and effects of fire and other risks. The following NFPA codes (listed numerically) are applicable to the Sepulveda Transit Corridor Project (Project), with the Project abiding to the most stringent requirements when requirements are prescribed in multiple codes and/or standards:

- NFPA 70 National Electrical Code is the benchmark for safe electrical design, installation, and inspection to protect people and property from electrical hazards (NFPA, 2023a).
- NFPA 72 National Fire Alarm and Signaling Code provides the latest safety provisions to meet society's changing fire detection, signaling, and emergency communications demands. In addition to the core focus on fire alarm systems, the Code includes requirements for mass notification systems used for weather emergencies; terrorist events; biological, chemical, and nuclear emergencies; and other threats (NFPA, 2022).
- NFPA 101 Life Safety Code is the most widely used source for strategies to protect people based on building construction, protection, and occupancy features that minimize the effects of fire and related hazards. Unique in the field, it is the only document that covers life safety in both new and existing structures (NFPA, 2024).
- NFPA 130 Standard for Fixed Guideway Transit and Passenger Rail Systems covers life safety from fire and fire protection requirements for fixed guideway transit and passenger rail systems, including stations, trainways, emergency ventilation systems, vehicles, emergency procedures, communications, and control systems. The purpose of this standard shall be to establish minimum requirements that will provide a reasonable degree of safety from fire and its related hazards in fixed guideway transit and passenger rail system environments. NFPA 130 outlines specific requirements for fire protection at stations, along the alignment, and within rail vehicles. This process ensures that stations are designed and constructed to ensure safe and secure operation, including use of non-combustible construction materials, emergency lighting, emergency egress, emergency access, emergency backup power, fire detection and suppression, and communications. (NFPA, 2023b).
- NFPA 780 Standard for the Installation of Lightning Protection Systems provides lightning protection system installation requirements to safeguard people and property from fire risk and related hazards associated with lightning exposure (NFPA, 2023c).

3.18.1.2 State

California Code of Regulations Title 8

Safety orders established by Title 8 of the California Code of Regulations (CCR) are discussed in the following subsections (California Department of Industrial Relations, 2024):

- Subchapter 4, Construction Safety Orders—Subchapter 4, Construction Safety Orders, establishes minimum safety standards whenever employment exists in connection with the construction, alteration, painting, repairing, construction maintenance, renovation, removal, or wrecking of any fixed structure or its parts. These orders also apply to all excavations not covered by other safety orders for a specific industry or operation.
- Subchapter 5, Electrical Safety Orders—The purpose of the Electrical Safety Orders is to provide minimum safety requirements and to assist in the elimination of accidents that may result from the operation, installation, removal, use, and maintenance of electrical equipment and tools.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) (California Department of Industrial Relations, 2023) was created by the Occupational Safety and Health Act of 1973 to enforce effective standards, assist and encourage employers to maintain safe and healthful working conditions, and to provide for enforcement, research, information, education and training in the field of occupational safety and health. Cal/OSHA's specific standards cover a wide variety of workplace safety issues, including:

- Fire and explosion hazards
- Tripping and falling hazards
- Machine hazards
- Heat illness prevention
- Electrical hazards
- Hazardous waste
- Trenches
- Confined spaces
- Use of respirators
- Specific operations
- Ergonomics

Cal/OSHA enforces job safety and health standards by conducting inspections and, in some cases, issuing citations and fines.

California Fire Code

The California Fire Code, CCR Title 24 Part 9, is based on the 2019 International Fire and Building Codes and contains regulations relating to construction and maintenance of buildings and the use of premises. Topics addressed in the code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist first responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and premises. The California Fire Code contains specialized technical regulations related to fire and life safety (International Code Council Incorporated, 2023a).

California Building Code

The California CCR Title 24 of the California Building Code (CBC) (International Code Council Incorporated, 2023b) is a compilation of building standards. State fire regulations include the following:

- Building standards (as also set forth in the CBC)
- Fire protection

- Notification systems
- Fire protection devices, such as extinguishers and smoke alarms
- Fire suppression training

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code set forth state fire regulations and include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training (California Legislative Information, 2024).

California Public Utilities Commission

The State of California, through Section 99152 of the Public Utilities Code, requires the California Public Utilities Commission (CPUC) to develop a safety oversight program for the design, construction, and operation of public transit guideways. To implement this mandate, the CPUC adopted General Order (GO) 164-E Safety Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems, which includes general requirements for any light-, heavy-, or rapid-rail system, monorail, automated people mover, or automated guideway transit system used for public transit and not regulated by the Federal Railroad Administration or not specifically exempted by statute from CPUC oversight. The CPUC also adopted the following applicable GOs:

- GO 26-D: Regulations governing clearances on railroads and street railroads with reference to side and overhead structures, parallel tracks, crossings of public roads, highways, and streets
- GO 33-B: Construction, reconstruction, maintenance, and operation of interlocking plants of railroads
- GO 52: Construction and operation of power and communication lines for the prevention or mitigation of inductive interference
- GO 118-A: Construction, reconstruction, and maintenance of walkways and control of vegetation adjacent to railroad tracks
- GO 127: Maintenance and operation of automatic train control systems/rapid transit systems
- GO 128: Construction of underground electric supply and communication systems
- GO 175-A: Rules and regulations governing roadway worker protection provided by rail transit agencies and rail fixed guideway systems

3.18.1.3 Regional

Los Angeles County Operational Area Emergency Operations Plan

The *Los Angeles County Operational Area Emergency Operations Plan* (CoLA CEO, 2023) addresses both the County of Los Angeles's planned response to extraordinary emergency situations impacting unincorporated areas of Los Angeles County as well as Operational Area coordination. An operational area is defined as a single county and all political subdivisions. The Operational Area Emergency Operations Plan establishes the coordinated emergency management system, which includes prevention, protection, response, recovery, and mitigation within the operational area. The Operational Area Emergency Operations Plan defines responsibilities and provides guidance to agencies/jurisdictions within the operational area on how to interface with the operational area coordinator during emergencies and disasters (CoLA CEO, 2023).

Los Angeles County Fire Department

The Los Angeles County Fire Department (LACFD) is responsible for protecting the lives and property of 4 million residents living in 1.25 million housing units in 60 cities, including the City of Los Angeles Habra in Orange County, and the unincorporated areas of Los Angeles County. LACFD's Homeland Security Team works with local, state, and federal agencies to ensure the safety and security against terrorism and all other risk-hazards.

LACFD's Emergency Response Services also include Dispatch, Lifeguards, Urban Search and Rescue, Air and Wildland, and Hazardous Materials Response.

County of Los Angeles All-Hazards Mitigation Plan

In 2020, the County of Los Angeles prepared an *All-Hazards Mitigation Plan* (AHMP) (CoLA CEO, 2020) to identify the County of Los Angeles's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to reduce or eliminate long-term risk to people and property from natural hazards. Potential hazards evaluated by the AHMP include hazards resulting from wildfires and other hazards.

Metro All-Hazards Mitigation Plan

The Metro AHMP (Metro, 2022) was prepared in response to the Disaster Mitigation Act of 2000. The Disaster Mitigation Act 2000 (also known as Public Law 106-390) requires state and local governments (including special districts and joint powers authorities) to prepare mitigation plans to document their planning process, and identify hazards, potential losses, needs, goals, and strategies.

- Develop mitigation goals and objectives - The risk assessment (hazard characteristics, inventory, and findings), along with municipal policy documents, were utilized to develop mitigation goals and objectives.
- Identify and prioritize mitigation actions - Based on the risk assessment, goals and objectives, existing literature/resources, and input from participating entities, mitigation activities were identified for each hazard.
- Prepare implementation strategy - Generally, high priority activities are recommended for implementation first. However, based on organizational needs and goals, project costs, and available funding, some medium or low priority activities may be implemented before some high priority items.
- Document mitigation planning process - The mitigation planning process is documented throughout this plan.

Metro Rail Design Criteria

The Metro Rail Design Criteria (MRDC) identifies Metro's recommended methods to construct, maintain, and monitor the relative safety of fixed-rail facilities. Alternative 6 would utilize the MRDC as the basis of design. Although, the MRDC would not be a required design criteria for Alternatives 1, 3, 4, and 5 an equivalent that includes all relevant design criteria related to safety would be required. For Alternative 6, MRDC provides specific direction about how to categorize potential hazards and the necessary actions, including suspending operations, should potential safety and security risks arise. MRDC also outlines the following basic methods of resolving or addressing any potential safety and security concerns:

- Installation of warning devices shall be used to detect the condition and to generate an adequate warning signal to correct the hazard or to provide for operating personnel/public reaction.
- Specialized procedures and training

Fire Life Safety Criteria

The *Metro Fire/Life Safety Criteria* is a part of the MRDC and establishes Metro's typical minimum requirements to provide a reasonable degree of safety from fire and its related hazards. These standard criteria cover fire protection requirements for underground, surface, elevated, trenched, and raised embankment fixed-guideway transit systems, vehicles, transit stations, and vehicle maintenance and storage areas. Fire safety is achieved by integrating facility design, operating equipment, hardware, procedures, and software subsystems to protect life and property from the effects of fire. The criteria pertain to station and guideway facilities, passenger vehicles, maintenance and storage facilities, system fire/life safety procedures, communications, rail operations control, and inspection, maintenance, and training. Alternative 6 would utilize the *Metro Fire/Life Safety Criteria*, and Alternatives 1, 3, 4, and 5 would utilize an equivalent.

3.18.1.4 Local

City of Los Angeles General Plan

City of Los Angeles General Plan Safety Element

The Safety Element of the *City of Los Angeles General Plan* (DCP, 2021) includes the following goals pertaining to safety and security within the City of Los Angeles:

- **Goal 2:** Emergency Response. A city that responds with the maximum feasible speed and efficiency to disaster events to minimize injury, loss of life, property damage and disruption of the social and economic life of the city and its immediate environs.
  - Objective 2.1 – Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City of Los Angeles's comprehensive hazard mitigation and recovery plans and programs.
    - Policy 2.1.1 – Coordination. Coordinate program formulation and implementation between the City of Los Angeles agencies, adjacent jurisdictions, and appropriate private and public entities to achieve, to the greatest extent feasible and within the resources available, the maximum mutual benefit with the greatest efficiency of funds and staff.
    - Policy 2.1.3 – Information. Develop and implement, within the resources available, training programs and informational materials designed to assist the general public in handling disaster situations in lieu of or until emergency personnel can provide assistance.
    - Policy 2.1.5 – Response. Develop, implement, and continue to improve the City of Los Angeles's ability to respond to emergency events.
    - Policy 2.1.6 – Standards/fire. Continue to maintain, enforce, and upgrade requirements, procedures, and standards to facilitate more effective fire suppression.

City of Los Angeles Local Hazard Mitigation Plan

The City of Los Angeles has developed a *Local Hazard Mitigation Plan* (LHMP) (City of Los Angeles, 2018) to reduce risks from disasters to the people, property, economy, and environment within the City of Los Angeles. The LHMP is the use of long-term and short-term policies, programs, projects, and other

activities to alleviate the death, injury, and property damage that can result from a disaster. The LHMP is incorporated as a component of the *City of Los Angeles General Plan Safety Element* (DCP, 2021) to illustrate the element's adherence to state requirements. Potential hazards evaluated by the LHMP include wildfires and other potential hazards.

City of Los Angeles General Plan Framework Element

The Framework Element of the *City of Los Angeles General Plan*, which was adopted in December 1996 and amended in August 2001 (DCP, 2001), is a long-range, citywide, comprehensive growth strategy. The Framework Element can be considered the organizing element because its policies address and connect all the elements of the plan. Chapter 9 (Infrastructure and Public Services) of the Framework Element includes policies related to public services. The Framework Element includes policies that address deficiencies, including the expansion of public services and infrastructure commensurate with levels of demand. Policies related to fire protection services and police protection services follow:

- **Fire Protection Services**
  - Policy 9.19.1 – Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.

City of Los Angeles Base Emergency Operations Plan

The *Emergency Operations Plan* for the City of Los Angeles outlines the response framework for all hazards and serves as the foundation for emergency responses within the City of Los Angeles (City of Los Angeles, 2023). The plan delineates the functions, structures, stakeholders, activities, personnel, resources, capabilities, mutual aid processes, and goals of the City of Los Angeles during an emergency or disastrous event.

City of Los Angeles Municipal Code – Fire Code

The City of Los Angeles Municipal Code (LAMC) – Fire Code serves as a guide to departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities located within the City of Los Angeles. Policies and programs addressed in the documents include the following: fire station distribution and location, required fire flow (i.e., water supply), fire hydrant standards and locations, access provisions, and emergency ambulance service.

All new construction must comply with applicable provisions set forth in the LAMC. In the Fire Protection and Prevention chapter of the LAMC, Chapter V, Article 7 (Fire Code), the Los Angeles Fire Department's (LAFD) Bureau of Fire Prevention and Public Safety is required to administer and enforce basic building regulations set by the State Fire Marshal. The local Fire Code contained within the LAMC also reflects the policies of the *City of Los Angeles General Plan Safety Element* (DCP, 2021). The Fire Code sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires or life safety hazards; the elimination of fire and life safety hazards in any building or structure, including buildings under construction; the maintenance of fire protection equipment and systems; and the regulation of the storage, use, and handling of hazardous materials.

City of Los Angeles Fire Department

The LAFD serves the City of Los Angeles and provides services, including fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. As part of standard development approval in Los Angeles, the LAFD reviews project plans for specific projects, and project applicants are required to incorporate the LAFD

recommendations into the final design of a project. Additionally, the LAFD requires that fire prevention measures be incorporated into final project plans for each building, in accordance with the California State Fire Code. Prior to issuance of any occupancy permits for development projects, the LAFD reviews the project plans for adequate on-site access, exit, and any necessary special equipment to assist firefighters.

3.18.2 Methodology

3.18.2.1 Operation and Construction

The Wildfire Resource Study Area (RSA) is identified as the fire service area and wildfire and fire risk area within the geographical boundaries as the Project Study Area. Impacts associated with emergency response and evacuation plans were evaluated based on the existing plans and policies. Impacts related to wildfire and fire risk are based on a review of the designated Fire Hazard Severity Zones and the LAFD strategic plan.

3.18.2.2 CEQA Thresholds of Significance

For the purposes of the Environmental Impact Report, impacts are considered significant if the Project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes

3.18.3 Project Measures

The following project measure (PM) would be implemented for all alternatives to ensure that impacts related to wildfire and fire risks remain less than significant during operation activities.

PM SAF-1: *The Project shall comply with all regulations of California Health and Safety Code Sections 13000 et seq. and City of Los Angeles Municipal Code pertaining to fire protection systems, such as the adequate provision of smoke alarms, fire extinguishers, building access, emergency response notification systems (master alarm system), fire flows, hydrant pressure and spacing, and relevant building codes relating to fire suppression and defensible space.*

Implementation of PM SAF-1 would address wildfire risks during operation of any of the alternatives.

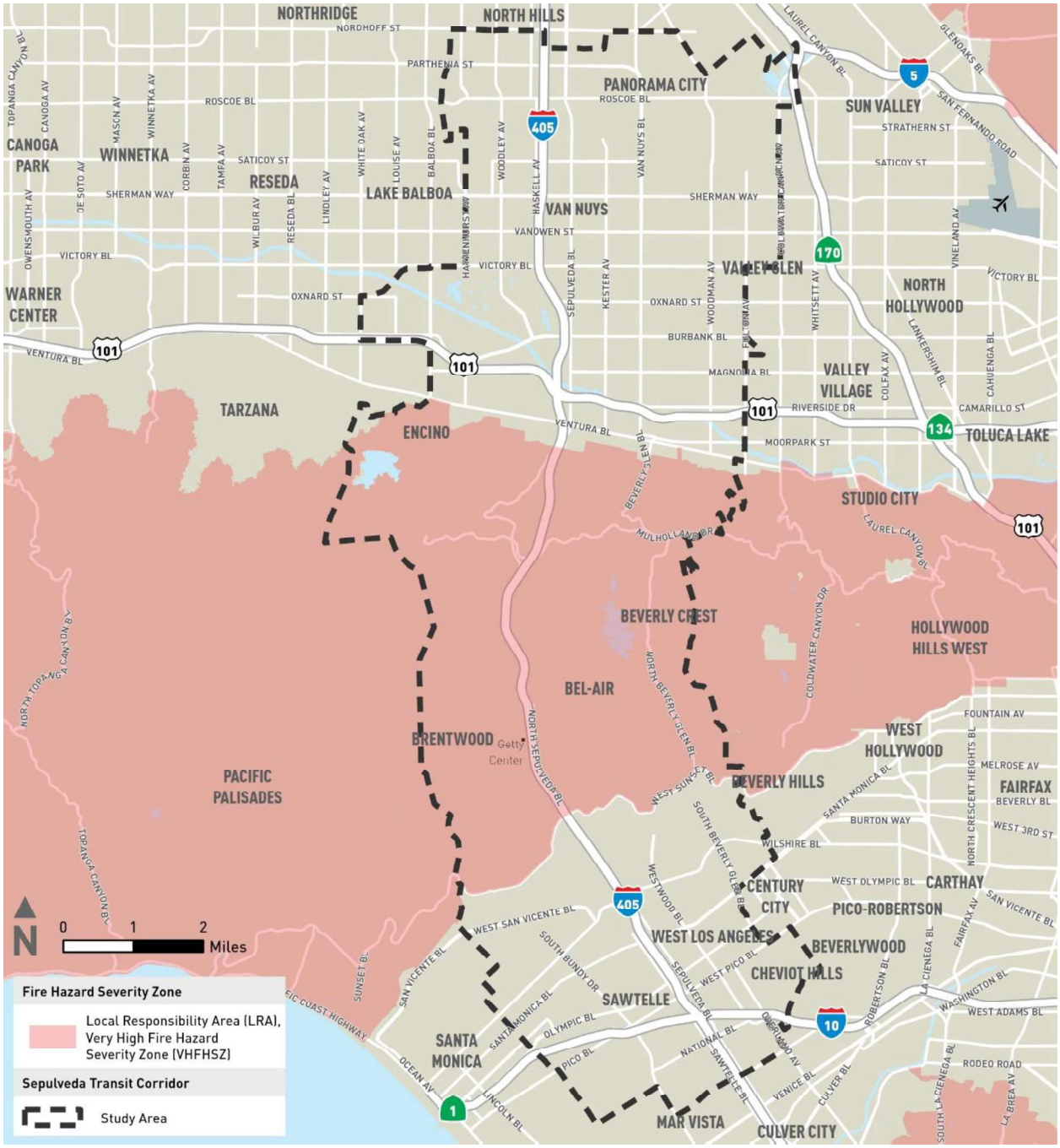
3.18.4 Existing Conditions

3.18.4.1 Wildfire

Wildfire is any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. Wildfire sparked by combustible vegetation could result in unplanned,

uncontrolled, and unpredictable wildfire. Wildfire behavior is based on three primary factors: topography, weather, and fuels. As shown on Figure 3.18-1, the RSA contains an area (within the Santa Monica Mountains) recommended by the California Department of Forestry and Fire Protection (CAL FIRE) and designated by the Local Responsibility Area (LRA) as a Very High Fire Hazard Severity Zone (VHFHSZ). Mapping of the areas, referred to as VHFHSZ, are based on data and models of potential fuels over a 30- to 50-year time horizon and their associated expected fire behavior, and expected burn probabilities to quantify the risk and nature of vegetation fire exposure (including firebrands) to buildings (CAL FIRE, 2011). Figure 3.18-2 through Figure 3.18-7 illustrate historic fires that have occurred since 2017 including the 2025 Palisades Fire, 2025 Sepulveda Fire, 2019 Getty Fire, and the 2017 Skirball Fire (CAL FIRE, 2017, 2019, 2025a, 2025b).

Figure 3.18-1. Wildfire Hazard Zone



Source: CAL FIRE, 2011; HTA, 2024

Figure 3.18-2. No Project Alternative: Historical Wildfires

Source: CAL FIRE, 2025c; HTA, 2025

Figure 3.18-3. Alternative 1: Historical Wildfires

Source: CAL FIRE, 2025c; HTA, 2025

Figure 3.18-4. Alternative 3: Historical Wildfires

Source: CAL FIRE, 2025c; HTA, 2025

Figure 3.18-5. Alternative 4: Historical Wildfires

Source: CAL FIRE, 2025c; HTA, 2025

Figure 3.18-6. Alternative 5: Historical Wildfires

Source: CAL FIRE, 2025c; HTA, 2025

Figure 3.18-7. Alternative 6: Historical Wildfires

Source: CAL FIRE, 2025c; HTA, 2025

Fuel

Undeveloped land that has natural habitats (e.g., grasslands, sage scrub), with extended droughts, and the region's characteristic Mediterranean climate results in large areas of dry vegetation that provide fuel for wildland fires. Moisture level, chemical makeup, and density is the fuel's composition that determines the degree of flammability. The moisture defines how quickly a fire can spread and how intense or hot a fire might become. High moisture content would slow the burning process. For example, some plants, shrubs, and trees contain oils or resins that promote faster and more intense burning. The physical density of the fuel source also influences flammability. For example, if fuel sources are compacted where air cannot circulate easily, the fuel source will not burn as quickly (NPS, 2017).

Weather

Weather conditions such as wind, temperature, and humidity are contributing factors to fire behavior. Wind can bring supply of oxygen to the fire and push the fire towards new fuel sources. The temperature of a fuel influences the ignition of the fire. The fuel sources that are combustible will ignite more easily at high temperatures than at low temperatures. Low humidity levels allow the fuels to become dry and more prone to catching fire, and fuels burn more quickly than when humidity levels are high (NPS, 2017).

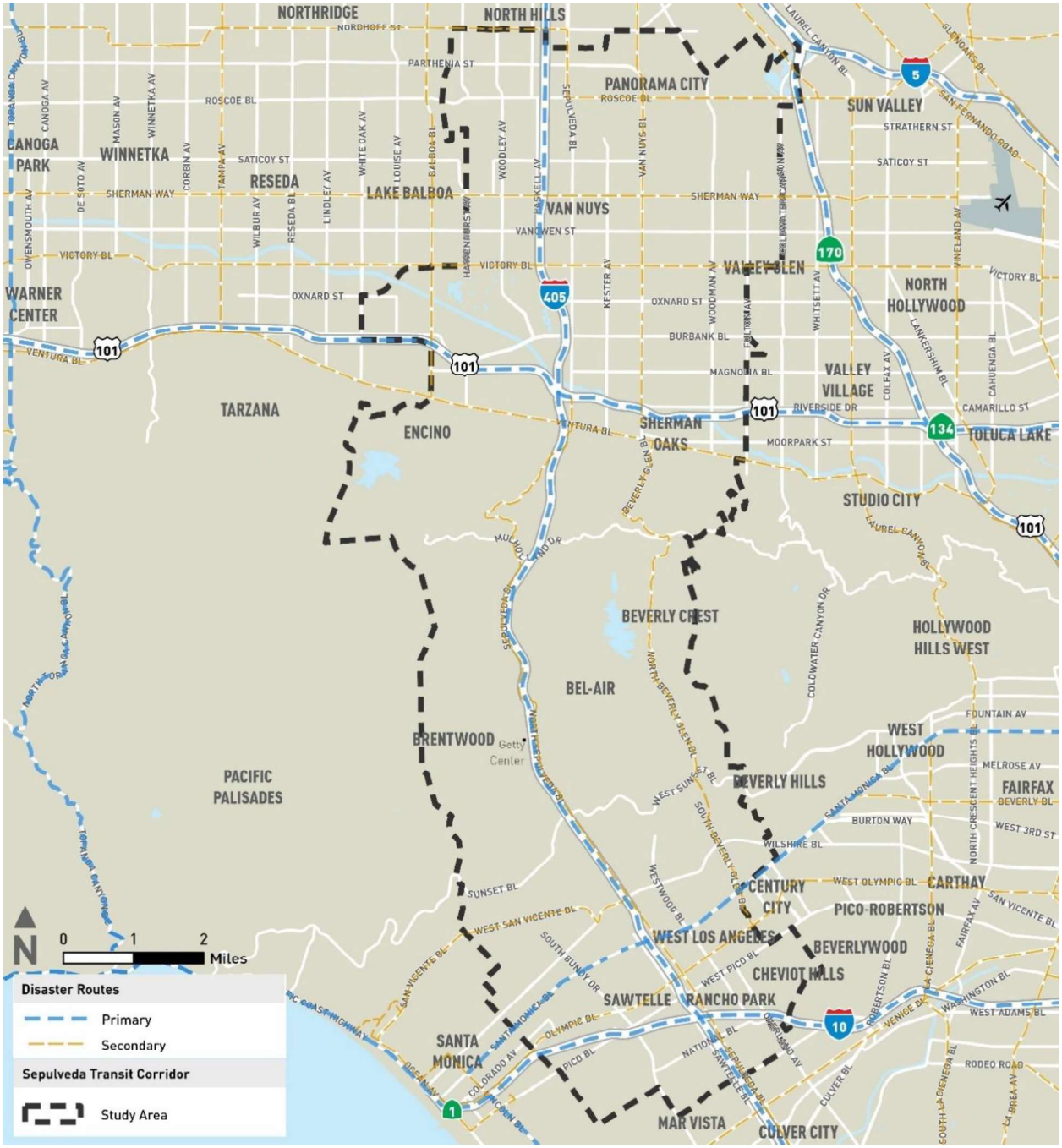
Topography

Topography describes land shape, including descriptions of elevation, slope, and aspect. The elevation is the height above sea level, the slope is the steepness of the land, and the aspect is the direction of a slope. These topographic features can help or hinder the spread of fire influencing a fire's intensity, direction, and rate of spread. Elevation, slope, and aspect are also important to consider in order to determine how hot and dry a given area would be. Higher elevations could be drier with colder temperature compared to the lower elevations. In addition, north-facing slopes would be slower to heat up or dry out (NPS, 2017). Fires burning in flat or gently sloping areas tend to burn more slowly and spread in wider ellipses than fires on steep slopes.

3.18.4.2 Disaster Routes

For the purposes of disaster routes, the RSA is defined as the Project Study Area. Disaster routes play a primary role in disaster response and recovery. During a disaster and immediately following, disaster routes are used to transport emergency equipment, supplies, and personnel into an affected area. Disaster routes are also utilized by fire, emergency medical services (EMS), and others involved with public safety for life saving measures. Disaster routes have priority for clearing, repairing, and restoration over all other roads. A number of disaster routes identified by the County of Los Angeles serve the RSA where the Project would be located. Figure 3.18-8 through Figure 3.18-13 show the locations of the disaster routes.

Figure 3.18-8. No Project Alternative: Disaster Routes



Source: LADPW, 2022; HTA, 2024

Figure 3.18-9 Alternative 1: Disaster Routes

Source: LADPW, 2022; HTA, 2024

Figure 3.18-10. Alternative 3: Disaster Routes

Source: LADPW, 2022; HTA, 2024

Figure 3.18-11. Alternative 4: Disaster Routes

Source: LADPW, 2022; HTA, 2024

Figure 3.18-12. Alternative 5: Disaster Routes

Source: LADPW, 2022; HTA, 2024

Figure 3.18-13. Alternative 6: Disaster Routes

Source: LADPW, 2022; HTA, 2024

3.18.5 Environmental Impacts

3.18.5.1 Impact WFR-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Project Alternatives

No Project Alternative

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant

Operational Impacts

As shown on Figure 3.18-8, the County of Los Angeles identifies Interstate 405 (I-405) and Sepulveda Boulevard as disaster routes. The No Project Alternative would operate Metro Line 761 buses along Sepulveda Boulevard in the Sepulveda Pass. However, the No Project Alternative would not affect emergency evacuation plans and roadway conditions because the roadway width and configuration would be kept accessible to emergency vehicles and fire equipment. The AHMP for the County of Los Angeles (CoLA CEO, 2020) and the LHMP for the City of Los Angeles (City of Los Angeles, 2018) address procedures for large-scale emergency situations (such as natural disasters and technological incidents) and not normal day-to-day emergencies. These emergency preparedness documents are for large-scale emergency situations (e.g., earthquakes, wildfire) that would apply to the entire County of Los Angeles and the City of Los Angeles. With adherence of existing regulations contained in the fire code, as discussed under Section 3.18.1, the No Project Alternative would result in a less than significant impact during operational activities.

Construction Impacts

Under the No Project Alternative, the Project would not be constructed. There could be minor improvements to Metro Line 761 infrastructure including bus stops, but that would be located off the street. Consequently, there would not be conflicts with emergency vehicles. Therefore, under the No Project Alternative, impacts would be less than significant during construction.

Alternative 1

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

As shown on Figure 3.18-9, the County of Los Angeles identifies I-405 and Sepulveda Boulevard as disaster routes (City of Los Angeles, 2023). Alternative 1 would introduce the aerial guideway and its support columns and bent columns within the median and adjacent to I-405 and has the potential to interfere with the implementation of an emergency response or evacuation plan. However, I-405 would be expanded so the roadway width and configuration would be kept accessible to emergency vehicles and fire equipment. Additionally, in the areas where Alternative 1 would affect Sepulveda Boulevard, the height of the proposed aerial guideway and clearance between supporting columns would be sufficient to maintain access to motor vehicles and would not impede the movement of emergency

vehicles and fire equipment. At signalized intersections, left-turning traffic would be maintained. Reconfigurations of the roadway on Sepulveda Boulevard and the I-405 on- and off-ramps would be kept accessible to emergency vehicles and fire equipment. As required by law, Alternative 1 would be designed in compliance with applicable codes set forth by the California Fire Code standards and the County of Los Angeles and City of Los Angeles regarding emergency vehicle access. Compliance to these design criteria would ensure that sufficient ingress and egress routes would be provided at all station areas, thereby reducing impacts related to the physical interference with an emergency response or evacuation plan.

Alternative 1 would comply with NFPA 130 Section 9.1 (NFPA, 2023b) and further reduce the aerial guideway's potential physical interference with an emergency response or evacuation plan. Under NFPA 130 Section 9.1, the authority responsible for the safe and efficient operation of a fixed guideway transit or passenger rail system would anticipate and plan for emergencies that could involve Alternative 1. Participating agencies would be invited to assist with the preparations of the *Emergency Procedure Plan*. Such coordination efforts with emergency services personnel including fire, police, and EMS would be agreed upon through third-party agreements or Memoranda of Understanding to ensure the Alternative 1 would not physically interfere with or substantially impair an adopted emergency response or evacuation plan. Therefore, operations would not physically interfere with an emergency response plan or emergency evacuation plans. In addition, the AHMP for the County of Los Angeles (CoLA CEO, 2020) and the LHMP for the City of Los Angeles (City of Los Angeles, 2018) address procedures for large-scale emergency situations, such as natural disasters and technological incidents and not normal day-to-day emergencies. These emergency preparedness documents are for large-scale emergency situations (e.g., earthquakes, wildfire) that would be applicable to the entire County of Los Angeles and the City of Los Angeles, including Alternative 1, which would adhere to these plans.

For the reasons previously mentioned, Alternative 1 would not physically interfere with an emergency response plan or emergency evacuation plans during operations. Additionally, with adherence of existing regulations, such as applicable fire code regulations, the AHMP for the County of Los Angeles and the LHMP for the City of Los Angeles, would result in a less than significant impact during operation.

Construction Impacts

As required by existing regulations, Alternative 1 would provide adequate access for emergency vehicles and equipment during construction activities. As shown on Figure 3.18-9, the County of Los Angeles identifies I-405 and Sepulveda Boulevard as disaster routes. Temporary, short-term construction impacts on I-405 and Sepulveda Boulevard would occur for Alternative 1. Construction activities would necessitate roadway improvements to provide sufficient space for the guideway, stations, traction power substation (TPSS) sites, and construction staging yards. Roadway improvements within I-405 and Sepulveda Boulevard would result in a temporary and intermittent reduction of the number of lanes or temporary closure of roadways. Temporary lane and/or roadway closures, increased truck traffic, and other roadway effects could temporarily interfere physically with an emergency response plan or emergency evacuation plans, and therefore result in a potentially significant impact.

As discussed in Section 3.2, Transportation, under mitigation measure (MM) TRA-4, Metro standard practices require that lane and/or roadway closures are scheduled to minimize disruptions and that a Transportation Management Plan (TMP) shall be prepared in coordination with local fire and police departments prior to construction, including the development of detour routes and notification procedures to facilitate and ensure safe and efficient traffic movement. The nearest local first responders would be notified, as appropriate, of traffic control plans during construction to coordinate

emergency response routing. Implementation of MM TRA-4 would reduce the impacts related to the physical interference with an emergency response plan or emergency evacuation plans to less than significant.

Additionally, as outlined in the regulatory framework described in Section 3.18.1, Alternative 1 would comply with the provisions set forth under the CCR Title 8 and Cal/OSHA. Under Cal/OSHA (California Department of Industrial Relations, 2023), the contractor would create an Emergency Action Plan that would cover designated actions that employers and employees must take to ensure employee safety from fire and other emergencies. The following elements, at a minimum, would be included in the plan:

- Procedures for emergency evacuation, including type of evacuation and exit route assignments
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate
- Procedures to account for all employees after emergency evacuation has been completed
- Procedures to be followed by employees performing rescue or medical duties
- The preferred means of reporting fires and other emergencies
- Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan

Adherence to existing laws, regulations, preparedness plans, and implementation of the TMP under MM TRA-4 would ensure that Alternative 1 would provide adequate access for emergency vehicles and not impede an adopted emergency response plan or emergency evacuation plan (City of Los Angeles, 2023). Therefore, construction of Alternative 1 would not impair implementation of, or physically interfere with, any adopted emergency response or evacuation plans, and this impact would be less than significant with mitigation.

Alternative 3

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Alternative 3 would have the same potential to affect emergency response and evacuation plans as Alternative 1 because Alternative 3 has a similar footprint and would operate within and adjacent to I-405 and the height of the aerial alignment and stations would be kept accessible to emergency vehicles and fire equipment. The same emergency access and large-scale emergency preparedness requirements discussed under Alternative 1 would be applicable to Alternative 3. Please refer to the Operational Impacts section in Alternative 1 for details regarding applicable emergency response documents and requirements, which are all applicable to Alternative 3.

With adherence to existing regulations and implementation of the standard coordination and design practices identified previously — such as applicable fire code regulations, the AHMP for the County of Los Angeles and the LHMP for the City of Los Angeles — Alternative 3 would result in a less than significant impact during operation activities.

Construction Impacts

Alternative 3 would have the same potential to affect emergency response and evacuation plans as Alternative 1 because Alternative 3 would be required to provide adequate access for emergency vehicles and equipment during construction activities. The same temporary construction impacts on street traffic and within I-405 discussed for Alternative 1 would occur under Alternative 3 and would be addressed in the same manner as discussed for Alternative 1. Please refer to the Construction Impacts section in Alternative 1 for details regarding applicable emergency response documents and requirements, which are all applicable to Alternative 3.

Adherence to existing laws, regulations, preparedness plans, and implementation of the TMP under MM TRA-4 (refer to Section 3.2, Transportation) would ensure that Alternative 3 would provide adequate access for emergency vehicles and the impact would be less than significant with mitigation during construction activities for Alternative 3.

Alternative 4

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Alternative 4 would operate underground from its southern terminus through the Santa Monica Mountains and in an aerial configuration within the public right-of-way (ROW) along Sepulveda Boulevard in the San Fernando Valley. As shown on Figure 3.18-11, the County of Los Angeles identifies portions of Sepulveda Boulevard, south of U.S. Highway 101 (US-101) as a disaster route. Alternative 4 would install aerial guideway columns and protective raised barriers in the median of Sepulveda Boulevard between Ventura Boulevard and US-101, which the County of Los Angeles identifies as a disaster route. Therefore, Alternative 4 has the potential to interfere with the implementation of an emergency response or evacuation plan.

The existing center lane along Sepulveda Boulevard is primarily striped as a two-way, left-turn lane. The reconfigurations of Sepulveda Boulevard would maintain the same number of general purpose lanes and would be kept accessible to emergency vehicles and fire equipment. Additionally, the height of the proposed aerial guideway and clearance between supporting columns on Sepulveda Boulevard would be sufficient to maintain access to motor vehicles and would not impede the movement of emergency vehicles and fire equipment. At signalized intersections, left-turning traffic would be maintained. Therefore, operations would not physically interfere with an emergency response plan or emergency evacuation plans.

Alternative 4 would be designed in compliance with applicable codes set forth by the California Fire Code standards and the County of Los Angeles and City of Los Angeles regarding emergency vehicle access. Compliance to these design criteria would ensure that sufficient ingress and egress routes would be provided at affected roadways. The installation of the viaduct's supporting columns and raised medians would affect the sight distance for emergency vehicles when making left turns on or onto Sepulveda Boulevard. However, Alternative 4 roadway design would adhere to geometric design standards set forth by the Caltrans Highway Design Manual (Caltrans, 2020) and LADOT (LADOT, 2010) so that the line of sight, impacted by the raised medians, would not be impaired for vehicles making turn movements on Sepulveda Boulevard.

In addition, the AHMP for the County of Los Angeles (CoLA CEO, 2020) and the LHMP for the City of Los Angeles (City of Los Angeles, 2018) address procedures for large-scale emergency situations, such as natural disasters and technological incidents and not normal day-to-day emergencies (City of Los Angeles, 2018). These emergency preparedness documents are for large-scale emergency situations (e.g., earthquakes, wildfire) that would apply to the entire County of Los Angeles and City of Los Angeles, including Alternative 4, which would adhere to these plans.

Alternative 4 would comply with NFPA 130 Section 9.1 (NFPA, 2023b) and further reduce the aerial guideway's potential physical interference with an emergency response or evacuation plan. Under NFPA 130 Section 9.1, the authority responsible for the safe and efficient operation of a fixed guideway transit or passenger rail system would anticipate and plan for emergencies that could involve Alternative 4. Participating agencies would be invited to assist with the preparations of the *Emergency Procedure Plan*. Such coordination efforts with emergency services personnel including fire, police, and EMS would be agreed upon through third-party agreements or Memoranda of Understanding to ensure that Alternative 4 would not physically interfere with or substantially impair an adopted emergency response or evacuation plan. Therefore, operations would not physically interfere with an emergency response plan or emergency evacuation plans.

Alternative 4 would not physically interfere with an emergency response plan or emergency evacuation plan during operations. Additionally, with adherence to existing regulations such as applicable federal, state, and local fire code regulations, the AHMP for the County of Los Angeles and the LHMP for the City of Los Angeles, Alternative 4 would result in a less than significant impact during operation.

Construction Impacts

As required by existing regulations, Alternative 4 would be required to provide adequate access for emergency vehicles and equipment during construction activities. As shown on Figure 3.18-11, the County of Los Angeles identifies Sepulveda Boulevard south of US-101 as a disaster route. Temporary short-term construction impacts on street traffic adjacent to and along Sepulveda Boulevard would occur for Alternative 4 due to roadway improvements that would provide sufficient space for the proposed guideway, stations, TPSS sites, and construction staging yards. Roadway improvements and the installation of the aerial guideway on Sepulveda Boulevard would result in a reduced number of lanes or temporary closure of roadways. Temporary lane and/or roadway closures, increased truck traffic, and other roadway effects could interfere with an emergency response plan or emergency evacuation plans and therefore result in a significant impact. Construction near LAFD Fire Station Number 88 would potentially interfere with an emergency response plan or emergency evacuation plans. LAFD Fire Station Number 88 is located 0.01 mile west of the Alternative 4 on 5101 Sepulveda Boulevard, Sherman Oaks, CA 91403. As shown on Figure 3.18-11, Sepulveda Boulevard is not an established disaster route where LAFD Fire Station Number 88 is located and therefore, impacts to an emergency response plan would be minimal.

As discussed in Section 3.2, Transportation, under MM TRA-4, a TMP shall be prepared in coordination with local fire and police departments prior to construction, including the development of detour routes and notification procedures to facilitate and ensure safe and efficient traffic movement. The nearest local first responders would be notified, as appropriate, of traffic control plans during construction to coordinate emergency response routing. Implementation of MM TRA-4 would reduce the impacts related to the physical interference with an emergency response plan or emergency evacuation plans to less than significant.

Additionally, as outlined in the regulatory framework described in Section 3.18.1, Alternative 4 would comply with the provisions set forth under the CCR Title 8 and Cal/OSHA. Under Cal/OSHA (California Department of Industrial Relations, 2023), the contractor would create an Emergency Action Plan that would cover designated actions that employers and employees must take to ensure employee safety from fire and other emergencies. The following elements, at a minimum, would be included in the plan:

- Procedures for emergency evacuation, including type of evacuation and exit route assignments
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate
- Procedures to account for all employees after emergency evacuation has been completed
- Procedures to be followed by employees performing rescue or medical duties
- The preferred means of reporting fires and other emergencies
- Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan

Adherence to existing regulations and implementation of MM TRA-4 (refer to the *Sepulveda Transit Corridor Project Transportation Technical Report* [Metro, 2025b]) would ensure that Alternative 4 would provide adequate access for emergency vehicles and not impede with an adopted emergency response plan or emergency evacuation plan (City of Los Angeles, 2023). Therefore, construction of Alternative 4 would not impair implementation of or physically interfere with any adopted emergency response or evacuation plans, and this impact would be less than significant with mitigation.

Alternative 5

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Alternative 5 would have similar potential to affect emergency response and evacuation plans as Alternative 4. However, the potential would be less, because Alternative 5 would operate primarily underground and would not affect emergency response or evacuation plans and routes because roadway conditions on surface streets would be kept accessible to emergency vehicles and fire equipment. The same emergency access and large-scale emergency preparedness requirements discussed under Alternative 4 would be applicable to Alternative 5. Please refer to the Operational Impacts section in Alternative 4 for details regarding applicable emergency response documents and requirements, which are all applicable to Alternative 5.

With adherence to existing regulations and implementation of the standard coordination and design practices identified previously, such as applicable fire code regulations, Alternative 5 would result in a less than significant impact during operation activities.

Construction Impacts

Alternative 5 would have the same potential to affect emergency response and evacuation plans as Alternative 4 because Alternative 5 would be required to provide adequate access for emergency vehicles and equipment during construction activities. Similar but limited temporary construction

impacts on street traffic discussed for Alternative 4 would occur under Alternative 5 and would be addressed in the same manner as discussed for Alternative 4. Please refer to the Construction Impacts section in Alternative 4 for details regarding applicable emergency response documents and requirements which are all applicable to Alternative 5.

Adherence to existing regulations and implementation of MM-TRA-4 (refer to the *Sepulveda Transit Corridor Project Transportation Technical Report* [Metro, 2025b]) would ensure that construction under Alternative 5 would provide adequate access for emergency vehicles, and the impact would be less than significant during construction activities for Alternative 5 with mitigation.

Alternative 6

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Since Alternative 6 would operate entirely underground within the Santa Monica Mountains and within the public ROW along Van Nuys Boulevard, Alternative 6 would not affect emergency response or evacuation plans and routes because roadway conditions on surface streets would be kept accessible to emergency vehicles and fire equipment. In addition, all new guideways, stations, and crossings would be designed in accordance with the MRDC, including Fire Life Safety Criteria, to ensure safety and minimize potential hazards at all locations of the project elements. Further compliance with applicable county and city design criteria pertinent to emergency vehicle access, as well as the California Fire Code standards, would ensure that sufficient ingress and egress routes would be provided at all station areas.

As required by law, operation of Alternative 6 would be required to provide adequate access for emergency vehicles during operational activities. In addition, the AHMP for the County of Los Angeles (CoLA CEO, 2020) and the LHMP for the City of Los Angeles (City of Los Angeles, 2018) address procedures for large-scale emergency situations, such as natural disasters and technological incidents and not normal day-to-day emergencies. These emergency preparedness documents are for large-scale emergency situations (e.g., earthquakes, wildfire) that would be applicable to the entire County of Los Angeles and City of Los Angeles, including Alternative 6. With adherence to existing regulations and implementation of the standard coordination and design practices identified previously, Alternative 6 would result in a less than significant impact during operation activities.

Construction Impacts

As required by existing regulations, Alternative 6 would be required to provide adequate access for emergency vehicles and equipment during construction activities. Temporary short-term construction impacts on street traffic adjacent to and along Bundy Avenue, Santa Monica Boulevard, and Van Nuys Boulevard would occur for Alternative 6 due to roadway and infrastructure improvements to provide sufficient space for the proposed guideway, stations, TPSS sites, and construction staging yards, and the potential extension of construction activities into the ROW that would result in a reduction of the number of lanes or temporary closure of roadways. Temporary lane and/or roadway closures, increased truck traffic, and other roadway effects that could temporarily interfere physically with an emergency response plan or emergency evacuation plans and therefore result in a significant impact. Furthermore, MM TRA-4 would ensure that emergency response teams for the City of Los Angeles, including the fire departments and police departments, would be notified of any lane closures during construction

activities and that a minimum of one lane would remain open at all times to provide adequate emergency access to the site and surrounding neighborhoods.

As discussed in the *Sepulveda Transit Corridor Project Transportation Technical Report* (Metro, 2025b), Metro standard practices require that lane and/or roadway closures are scheduled to minimize disruptions and that a TMP is prepared and approved in coordination with local fire and police departments prior to construction, including the development of detour routes and notification procedures facilitate and ensure safe and efficient traffic movement. The TMP would address short-term traffic circulation and access effects during project construction. Specifically, the TMP shall include the elements to reduce traveler and emergency responder delays and enhance safety during project construction. The nearest local first responders would be notified, as appropriate, of traffic control plans during construction to coordinate emergency response routing. Implementation of MM TRA-4 would reduce the impacts related to physical interference with an emergency response plan or emergency evacuation plans to less than significant.

Additionally, as outlined in the regulatory framework described in Section 3.18.1, Alternative 6 would comply with the provisions set forth under the CCR Title 8 and Cal/OSHA. Under Cal/OSHA (California Department of Industrial Relations, 2023), the contractor would create an Emergency Action Plan that would cover designated actions that employers and employees must take to ensure employee safety from fire and other emergencies. The following elements, at a minimum, would be included in the plan:

- Procedures for emergency evacuation, including type of evacuation and exit route assignments
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate
- Procedures to account for all employees after emergency evacuation has been completed
- Procedures to be followed by employees performing rescue or medical duties
- The preferred means of reporting fires and other emergencies
- Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan

Adherence to existing regulations and implementation of the MM TRA-4 (refer to the *Sepulveda Transit Corridor Project Transportation Technical Report* [Metro, 2025b]) would ensure that the construction of Alternative 6 would provide adequate access for emergency vehicles and the impact would be less than significant during construction activities for Alternative 6 with mitigation.

Maintenance and Storage Facilities

Monorail Transit Maintenance and Storage Facility Base Design (Alternatives 1 and 3)

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

As required by law, the proposed maintenance and storage facility (MSF) Base Design would be required to provide adequate access for emergency vehicles during operational activities. Additionally, the proposed MSF Base Design would comply with applicable Fire Code regulations for issues including fire

protection systems and equipment, general safety precautions, and equipped with fire hydrants. In addition, the AHMP for the County of Los Angeles and the LHMP for the City of Los Angeles address procedures for large-scale emergency situations, such as natural disasters and technological incidents and not normal day-to-day emergencies. These emergency preparedness documents are for large-scale emergency situations (e.g., earthquakes, wildfire) that would be applicable to the entire County of Los Angeles and the City of Los Angeles, including the proposed MSF Base Design. With adherence of existing regulations, the proposed MSF Base Design would result in a less than significant impact during operational activities.

Construction Impacts

As required by existing regulations, the proposed MSF Base Design would be required to provide adequate access for emergency vehicles during construction activities. Temporary short-term construction impacts on street traffic adjacent to the proposed MSF Base Design due to roadway and infrastructure improvements could result in a reduction of the number of lanes or temporary closure of segments of adjacent roadways and therefore result in a potentially significant impact to emergency vehicle access and movement. Any such impacts would be limited to the construction period of the proposed MSF Base Design and would affect only adjacent streets. Furthermore, MM TRA-4 would ensure that emergency response teams for the City of Los Angeles, including the fire departments and police departments, would be notified of any lane closures during construction activities and that a minimum of one lane would remain open at all times to provide adequate emergency access to the site and surrounding neighborhoods. As discussed in the *Sepulveda Transit Corridor Project Transportation Technical Report* (Metro, 2025b), under MM TRA-4, MSF Base Design shall implement a TMP to ensure safe and efficient traffic flow in the area during project construction, including the development of detour routes and notification procedures. The nearest local first responders would be notified, as appropriate, of traffic control plans during construction to coordinate emergency response routing.

Adherence to existing regulations and implementation of the TMP (refer to the *Sepulveda Transit Corridor Project Transportation Technical Report* [Metro, 2025b]) would ensure that the proposed MSF Base Design would provide adequate access for emergency vehicles, and the impact would be less than significant during construction activities with mitigation.

Monorail Transit Maintenance and Storage Facility Design Option 1 (Alternatives 1 and 3)

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

As required by law, the proposed MSF Design Option 1 would be required to provide adequate access for emergency vehicles during operational activities. Additionally, during the design and implementation, the proposed MSF Design Option 1 would comply with applicable federal, state, county, and city fire code regulations as outlined in Section 3.18.1, including: fire protection systems and equipment, fire suppression and sprinkler systems, general safety precautions; it would also be , and equipped with fire hydrants. In addition, the AHMP for the County of Los Angeles and the LHMP for the City of Los Angeles address procedures for large-scale emergency situations, such as natural disasters and technological incidents and not normal day-to-day emergencies. These emergency preparedness documents are for large-scale emergency situations (e.g., earthquakes, wildfire) that would be

applicable to the entire County of Los Angeles and the City of Los Angeles, including the proposed MSF Design Option 1. With adherence of existing regulations, the proposed MSF Design Option 1 would result in a less than significant impact during operational activities.

Construction Impacts

As required by existing regulations, the proposed MSF Design Option 1 would be required to provide adequate access for emergency vehicles during construction activities. Temporary short-term construction impacts on street traffic adjacent to the proposed MSF Design Option 1 because of roadway and infrastructure improvements could result in a reduction of the number of lanes or temporary closure of segments of adjacent roadways, resulting in a potentially significant impact to emergency vehicle access and movement. Any such impacts would be limited to the construction period of the proposed MSF Design Option 1 and would affect only adjacent streets. Furthermore, MM TRA-4 (Section 3.18.6) ensures that emergency response teams for the City of Los Angeles, including the fire departments and police departments, would be notified of any lane closures during construction.

As discussed in the *Sepulveda Transit Corridor Project Transportation Technical Report* (Metro, 2025b), a TMP and notification procedures would be implemented to ensure safe and efficient traffic flow in the area during project construction (MM TRA-4), including the proposed MSF Design Option 1. The TMP would address short-term traffic circulation and access effects during the proposed MSF Design Option 1 construction. Specifically, the TMP shall include elements to reduce traveler and emergency responder delays and enhance safety during the proposed MSF Design Option 1 construction.

Adherence to existing regulations and implementation of the TMP (refer to the *Sepulveda Transit Corridor Project Transportation Technical Report* [Metro, 2025b]) would ensure that the proposed MSF Design Option 1 would provide adequate access for emergency vehicles and the impact would be less than significant during construction activities with mitigation.

Electric Bus Maintenance and Storage Facility (Alternative 1)

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

As required by law, the proposed Electric Bus MSF would be required to provide adequate access for emergency vehicles during operational activities. Additionally, during the design and implementation of the proposed Electric Bus MSF, the Electric Bus MSF would comply with applicable federal, state, county, and city fire code regulations outlined in Section 3.18.1, including: fire protection systems and equipment, fire suppression and sprinkler systems, and general safety precautions; it would also be equipped with fire hydrants. In addition, the AHMP for the County of Los Angeles and the LHMP for the City of Los Angeles address procedures for large-scale emergency situations, such as natural disasters and technological incidents, and not normal day-to-day emergencies. These emergency preparedness documents are for large-scale emergency situations (e.g., earthquakes, wildfire) that would be applicable to the entire County of Los Angeles and the City of Los Angeles, including the proposed Electric Bus MSF. With adherence of existing regulations, the proposed Electric Bus MSF would result in a less than significant impact related to emergency response plans during operational activities.

Construction Impacts

As required by existing regulations, the proposed Electric Bus MSF would be required to provide adequate access for emergency vehicles during construction activities. Temporary short-term construction impacts on street traffic adjacent to the proposed Electric Bus MSF because of roadway and infrastructure improvements could result in a reduction of the number of lanes or temporary closure of segments of adjacent roadways and result in a potentially significant impact to emergency vehicle access and movement. Any such impacts would be limited to the construction period of the proposed Electric Bus MSF and would affect only adjacent streets.

As discussed in the *Sepulveda Transit Corridor Project Transportation Technical Report* (Metro, 2025b), under MM TRA-4, a TMP shall be implemented in coordination with first responders and emergency service providers to minimize impacts on emergency response. Coordination efforts shall include the development of detour routes and notification procedures to facilitate and ensure safe and efficient traffic movement. The design builder shall notify the nearest local first responders, as appropriate, of traffic control plans during construction to coordinate emergency response routing.

Adherence to existing regulations and implementation of the TMP (refer to the *Sepulveda Transit Corridor Project Transportation Technical Report* [Metro, 2025b]) would ensure that the proposed Electric Bus MSF would provide adequate access for emergency vehicles and the impact would be less than significant during construction activities with mitigation.

Heavy Rail Transit Maintenance and Storage Facility (Alternatives 4, 5, and 6)

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

As required by law, the proposed MSF would be required to provide adequate access for emergency vehicles during operational activities. Additionally, during the design and implementation of the proposed MSF, the MSF would comply with applicable state, county and city fire code regulations outlined in Section 3.18.1, including fire protection systems and equipment, fire suppression and sprinkler systems, general safety precautions; it would be equipped with fire hydrants. In addition, the AHMP for the County of Los Angeles and the LHMP for the City of Los Angeles address procedures for large-scale emergency situations, such as natural disasters and technological incidents and not normal day-to-day emergencies. These emergency preparedness documents are for large-scale emergency situations (e.g., earthquakes, wildfire) that would apply to the entire County of Los Angeles and the City of Los Angeles, including the proposed MSF. With adherence to existing regulations, the proposed MSF would result in a less than significant impact during operational activities.

Construction Impacts

As required by existing regulations, the proposed MSF would be required to provide adequate access for emergency vehicles during construction activities. Temporary short-term construction impacts on street traffic adjacent to the proposed MSF because of roadway and infrastructure improvements could result in a reduced number of lanes or temporary closure of segments of adjacent roadways and result in a potentially significant impact. Any such impacts would be limited to the construction period of the proposed MSF and would affect only adjacent streets. Furthermore, MM TRA-4 would ensure that

emergency response teams for the City of Los Angeles, including the fire departments and police departments, would be notified of any lane closures during construction activities.

As discussed in the *Sepulveda Transit Corridor Project Transportation Technical Report* (Metro, 2025b, a TMP and notification procedures would be implemented to ensure safe and efficient traffic flow in the area during the proposed MSF construction. The TMP would address short-term traffic circulation and access effects during the proposed MSF construction. Specifically, the TMP shall include elements to reduce traveler and emergency responder delays and enhance safety during project construction.

Adherence to existing regulations and implementation of the TMP (refer to the *Sepulveda Transit Corridor Project Transportation Technical Report* [Metro, 2025b]) would ensure that the proposed MSF would provide adequate access for emergency vehicles, and the impact would be less than significant during operational and construction periods with mitigation.

3.18.5.2 Impact WFR-2: Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Project Alternatives

No Project Alternative

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant

Operational Impacts

Some areas within the Santa Monica Mountains consist of undeveloped land that has natural habitats (e.g., grasslands, sage scrub) that experience extended droughts. These conditions, combined with the region's characteristic Mediterranean climate, result in large areas of dry vegetation that provide fuel for wildland fires. The Sepulveda Pass region serves as a channel for wind passing through and supplies oxygen to potential fires. Under the No Project Alternative, Metro Line 761 would operate in an existing right-of-way, and not create conditions that would affect wildfire.

Therefore, impacts related to exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope, prevailing winds, and other factors that would exacerbate wildfire risks associated with the No Project would be less than significant during operations.

Construction Impacts

Some areas within the Santa Monica Mountains region comprise undeveloped land that has natural habitats (e.g., grasslands, sage scrub) that experience extended droughts. These conditions, combined with the region's characteristic Mediterranean climate, result in large areas of dry vegetation and provide fuel for wildland fires. The Sepulveda Pass region serves as a channel for wind passing through and would increase the supply of oxygen to potential fires and push fire toward new fuel sources. Under the No Project Alternative, the Project would not be constructed. There could be minor improvements to Metro Line 761 infrastructure including bus stops, but that would be located off the street. Therefore, impacts related to exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope, prevailing winds, and other factors that would exacerbate

wildfire risks associated with the No Project Alternative would be less than significant during construction with mitigation.

Alternative 1

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Operational activities associated with the implementation of Alternative 1 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. The areas surrounding the Sepulveda Pass in the Sepulveda Mountains consist of undeveloped land that has natural habitats (e.g., grasslands, sage scrub) that experience extended droughts. These conditions, combined with the region's characteristic Mediterranean climate, result in large areas of dry vegetation and provide fuel for wildland fires. Additionally, these areas include an elevated slope and height above sea level, and steepness of land that can increase the spread of fire by influencing a fire's intensity, direction, and rate of spread.

Alternative 1 would be located within the Sepulveda Pass at the base of the Santa Monica Mountains within the median of I405 and/or the landscaped areas adjacent to I-405. While Alternative 1 would be located within a VHFHSZ zone, a majority of the project elements and aerial guideway would be located in existing paved areas within I-405. Alternative 1 would install three TPSSs (within the VHFHSZ) that would be located north of the proposed Getty Center Station, east of the intersection between Promontory Road and Sepulveda Boulevard, and north of the Skirball Center Drive overpass. A TPSS is an electrical substation that converts electric power to an appropriate voltage to power the proposed monorail. Equipment malfunction associated with the TPSSs could create sparks and could potentially ignite the fuel sources at the undeveloped areas in the Santa Monica Mountains. Therefore, Alternative 1 could exacerbate wildfire risks and the risk for the transit patrons occupying Alternative 1 to be exposed to pollutant concentrations. PM SAF-1 (Section 3.18.3) would ensure that Alternative 1 would reduce wildfire risks through Metro's compliance with all regulations of the California Health and Safety Code Sections 13000 et seq. and the LAMC pertaining to fire protection systems during operations. Additionally, if and when a wildfire would occur in the Santa Monica Mountains due to the TPSSs, Metro would suspend operations of Alternative 1. Provisions under NFPA 130 would require the Alternative 1 operator to develop a passenger evacuation protocol under emergency circumstances where assistance is required. Implementing these measures would reduce the risk of exposing Alternative 1 transit users to pollutant concentrations.

Compliance with all state laws, plans, policies, and regulations regarding wildfire prevention and suppression, as well as implementation of PM SAF-1 (Section 3.18.3) for Alternative 1 would ensure that impacts to wildfire risks would be less than significant.

Construction Impacts

Construction activities associated with the implementation of Alternative 1 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which has the potential for wildfires. Construction activities associated with this portion of the guideway would primarily be located within the I-405 median. However, areas between the southbound I-405 Getty off-ramp and Skirball Center Drive and the proposed Getty Center Station would be located in undeveloped areas with existing dry vegetation.

Construction activities and staging areas would be located at the base of the mountain range within the landscaped areas adjacent to I-405, which includes an elevated slope and height above sea level, and steepness of land that can increase the spread of fire by influencing a fire's intensity, direction, and rate of spread. The areas surrounding the proposed alignment and station comprise undeveloped land that has natural habitats (e.g., grasslands, sage scrub) that experience extended droughts. These conditions — combined with the region's characteristic Mediterranean climate — result in large areas of dry vegetation and provide fuel for wildland fires. Additionally, low humidity levels allow the fuels surrounding the construction of the proposed alignment, station, and TPSS sites to become dry and more prone to catching fire and burning more quickly than when humidity levels are high (NPS, 2017).

Ignition sources during construction of Alternative 1 would include surface-level or aboveground welding activities and hot exhaust from a vehicle or motorized equipment parked on dry grass; additionally, welding during high winds could send sparks traveling through the air to land on and ignite dry grass. Wildfire ignition from construction activity could increase the risk of exposing project occupants to pollutants and result in a potentially significant impact.

To reduce the impacts related to wildfires, Alternative 1 would implement MM SAF-1 and MM SAF-2 (Section 3.18.6). MM SAF-1 and MM SAF-2 provide construction-related protocols that would curtail work under red-flag warning days and maintain and monitor potential sources of fuel and ignition in order to reduce impacts related to exacerbating wildfire risks to a less than significant level. Additionally, in the event of a wildfire in the Santa Monica Mountains, the construction contractor would halt construction activities if the wildfires posed a threat to human health. Implementation of MM SAF-1 and MM SAF-2 (refer to Section 3.18.6) would ensure that the impacts associated with exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire (due to slope, prevailing winds, and other factors that exacerbate wildfire risks) would be less than significant with mitigation.

Alternative 3

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

As with Alternative 1, operational activities associated with the implementation of Alternative 3 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. Similar to Alternative 1, Alternative 3 would have potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to the existing slope, prevailing winds, and other factors such as fuel sources associated with the project elements as described previously. These factors would increase the risk to transit patrons due to potential exposure to wildfires. Please refer to the Operational Impacts section in Alternative 1 for details on the conditions that contribute to Alternative 3 wildfire risks. Although PM SAF-1 would ensure that the Project would reduce wildfire risks through Metro's compliance with all regulations of the California Health and Safety Code Sections 13000 et seq. and the LAMC pertaining to fire protection systems during operations, Alternative 3 would continue to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to the project elements being located within the open space areas designated as VHFHSZ.

Compliance with all state laws, plans, policies, and regulations regarding wildfire prevention and suppression, as well as implementation of PM SAF-1 for Alternative 3 would minimize impacts associated with wildfire risks and would ensure that impacts to wildfire risks would be less than significant.

Construction Impacts

Alternative 3 construction activities would have the same potential for wildfires as those described for Alternative 1. Please refer to the Construction Impacts section in Alternative 1 for details regarding wildfire conditions and risk as well as regulatory requirements applicable to Alternative 3. The implementation of MM SAF-1 and MM SAF-2 would ensure that the impacts associated with exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire (due to slope, prevailing winds, and other factors that exacerbate wildfire risks) would be less than significant with mitigation.

Alternative 4

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Operational activities associated with the implementation of Alternative 4 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ.

A majority of the alignment in the VHFHSZ would be underground (at the depth of the tunnel) where no impacts related to the exacerbation of wildfires are anticipated. However, the tunnel portal at Del Gado Drive, south of the proposed Ventura Boulevard Station, would be located in the VHFHSZ within a developed area that includes some open space areas. The areas surrounding the proposed tunnel portal consists of undeveloped land that has natural habitats (e.g., grasslands, sage scrub) as well as developed land consisting of residential land uses; these areas experience extended droughts, and combined with the region's characteristic Mediterranean climate, results in large areas of dry vegetation that provide fuel for wildland fires. Additionally, these areas include an elevated slope and height above sea level and steepness of land that can increase the spread of fire by influencing a fire's intensity, direction, and rate of spread.

Alternative 4 would introduce the tunnel portal within the VHFHSZ; the portal would consist of reinforced concrete and rail. Project elements associated with the tunnel portal are not prone to flammability, nor would they consist of electrical components that would be a source of ignition

While its underground alignment and tunnel portal would not exacerbate wildfire risk, Alternative 4 could expose project occupants to pollutant concentrations in the event of a wildfire. However, Alternative 4 would suspend operations in the event of a wildfire and would comply with the provisions under NFPA 130, which requires an evacuation protocol. Furthermore, PM SAF-1 would ensure that Alternative 4 would reduce wildfire risks through Metro's compliance with all regulations set forth by the State of California and City of Los Angeles. Compliance with all state laws, plans, policies, and regulations regarding wildfire prevention and suppression, as well as implementation of PM SAF-1, would ensure that impacts associated with wildfire risks would be less than significant.

Construction Impacts

Construction activities associated with the implementation of Alternative 4 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1.

A majority of the alignment in the VHFHSZ would be underground at the depth of the tunnel where no impacts related to the exacerbation of wildfires are anticipated. Construction activities and construction equipment used to build the tunnel portal would be located approximately at 15341 Del Gado Drive. The areas surrounding the tunnel portal consist of undeveloped and developed land that has natural habitats (e.g., grasslands, sage scrub). Extended droughts, combined with the region's characteristic Mediterranean climate, result in large areas of dry vegetation that provide fuel for wildland fires. Additionally, low humidity levels would potentially make the fuels surrounding the proposed alignment and tunnel portal to become dry and more prone to catching fire and burning more quickly than when humidity levels are high (NPS, 2017). Potential ignition sources include surface-level or aboveground welding activities and hot exhaust from a vehicle or motorized construction equipment parked on dry grass; additionally, welding during high winds could send sparks traveling through the air to land on and ignite dry grass.

Tunnel portal construction activities occurring within the vegetated areas of the Santa Monica Mountains could exacerbate the potential risk of wildfire due to the ignition sources previously described, coupled with the existing slope and prevailing winds. Such risks are heightened if vegetation that serves as fuel is not properly controlled. Wildfire ignition from construction activity could increase the risk of exposing project occupants to pollutants and result in a potentially significant impact.

To minimize the impacts related to wildfires, Alternative 4 would implement MM SAF-1 and MM SAF-2 (Section 3.18.6). MM SAF-1 and MM SAF-2 provide construction-related protocols that would curtail work under red-flag warning days and maintain and monitor potential sources of fuel and ignition to reduce impacts related to exacerbating wildfire risks to a less than significant level. In the event of a wildfire in the Santa Monica Mountains, the construction contractor would halt construction activities if the wildfires posed a threat to human health.

The implementation of MM SAF-1 and MM SAF-2 would lessen the impacts associated with exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. As a result, the impacts, considering factors such as slope, prevailing winds, and other conditions that exacerbate wildfire risks, would be less than significant with mitigation.

Alternative 5

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant

Operational Impacts

Operational activities associated with the implementation of Alternative 5 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. Due to the depth of the proposed alignment and TPSS sites, operation of Alternative 5 would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to the existing slope, prevailing winds, and other factors. Alternative 5 would introduce the tunnel portal within the VHFHSZ; the portal would consist of reinforced concrete and rail. Project elements associated with the tunnel portal are not prone to flammability, nor would they consist of electrical components

that would be a source of ignition. Additionally, provisions under NFPA 130 would require the operator of Alternative 5 to develop a passenger evacuation protocol under emergency circumstances where assistance is required. PM SAF-1 would ensure that Alternative 5 would reduce wildfire risks through Metro's compliance with all regulations of the California Health and Safety Code Sections 13000 et seq. and the LAMC pertaining to fire protection systems during operations. Compliance with all state laws, plans, policies, and regulations regarding wildfire prevention and suppression, as well as implementation of PM SAF-1 (Section 3.18.3) for Alternative 5 would ensure that impacts to wildfire risks would be less than significant.

Construction Impacts

Construction activities associated with project elements for the proposed alignment and TPSS locations would be underground and would have minimal direct health impacts related to smoke and fire, as well as the destruction of property. The tunnel boring machine would bore the Alternative 5 alignment underground. The entire alignment in the VHFHSZ would be underground at the depth of the tunnel, where no impacts related to the exacerbation of wildfires are anticipated. Therefore, the impacts associated with exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire risks due to slope, prevailing winds, and other factors that exacerbate wildfire risks, would be less than significant.

Alternative 6

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Operational activities associated with the implementation of Alternative 6 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. The areas surrounding the Santa Monica Mountains consist of undeveloped land that has natural habitats (e.g., grasslands, sage scrub) that experience extended droughts. These conditions, combined with the region's characteristic Mediterranean climate, result in large areas of dry vegetation and provide fuel for wildland fires. Additionally, these areas include an elevated slope and height above sea level, and steepness of land that can increase the spread of fire by influencing a fire's intensity, direction, and rate of spread.

The Alternative 6 alignment would be underground at the depth of the tunnel and would not exacerbate fire risks. However, some project elements, including the ventilation shaft, two TPSS locations, and the access road would be located above ground, within the private open space areas designated for the Stone Canyon Reservoir east of I-405 and Sepulveda Boulevard. A TPSS is an electrical substation that would convert electric power to an appropriate voltage to power the proposed monorail. Equipment malfunction associated with the TPSSs could create sparks and could potentially ignite the fuel sources at the undeveloped areas in the Santa Monica Mountains. Due to the depth of the proposed alignment, operation of Alternative 6 would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. The operation of the ventilation shaft is intended to provide adequate air circulation in the tunnel. If a wildfire were to occur at the surface level, some of the pollutant concentrations from a wildfire may reach the tunnel. However, the ventilation shaft is also a fire line safety requirement, which includes fire suppression and pollutant capturing elements.

Compliance with all state laws, plans, policies, and regulations regarding wildfire prevention and suppression, as well as implementation of PM SAF-1, would ensure that impacts associated with wildfire risks would be less than significant during operational activities.

Construction Impacts

Construction activities associated with the implementation of Alternative 6 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1 and would have the potential to ignite wildfires. While the proposed alignment would be constructed underground at the depth of the proposed tunnel, the ventilation shaft and its access road would require construction in open space areas. The Stone Canyon Reservoir is located south of Mulholland Drive and features an elevated slope and height above sea level, and steepness of land that can increase the spread of fire by influencing a fire's intensity, direction, and rate of spread. The areas surrounding the ventilation shaft and access road consist of private, undeveloped land that has natural habitats (e.g., grasslands, sage scrub), as well as developed land consisting of residential uses and facilities associated with the Stone Canyon Reservoir. Extended droughts, combined with the region's characteristic Mediterranean climate, can yield large areas of dry vegetation and provide fuel for wildland fires. Additionally, low humidity levels allow the fuels to become dry and more prone to catching fire and burning more quickly than when humidity levels are high (NPS, 2017).

Construction activities occurring within the vegetated areas of the Stone Canyon Reservoir could exacerbate the potential risk of wildfire by adding to ignition sources within the area if not properly controlled. Potential ignition sources include surface-level welding activities and hot exhaust from a vehicle or motorized construction equipment parked on dry grass; additionally, welding during high winds could send sparks traveling through the air to land on and ignite dry grass. Wildfire ignition from construction activity could increase the risk of exposure to pollutants and result in a potentially significant impact.

To minimize the impacts related to wildfires, Alternative 6 would implement MM SAF-1 and MM SAF-2 (Section 3.18.6). MM SAF-1 and MM SAF-2 provide construction-related protocols that would curtail work under red-flag warning days and maintain and monitor potential sources of fuel and ignition to reduce impacts related to exacerbating wildfire risks to a less than significant level. In the event of a wildfire in the Santa Monica Mountains, the construction contractor would halt construction activities if wildfires posed a threat to human health. The implementation of MM SAF-1 and MM SAF-2 would ensure that the impacts associated with exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire risks (due to slope, prevailing winds, and other factors that exacerbate wildfire) would be less than significant with mitigation.

Maintenance and Storage Facilities

Monorail Transit Maintenance and Storage Facility Base Design (Alternatives 1 and 3)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF Base Design would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as a State Responsibility Area (SRA) or land classified as VHFHSZ are located approximately 4.0 miles south of the MSF Base Design.

Therefore, the operation and construction of the MSF Base Design would not intensify slope, prevailing winds, and other factors that exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, and no impact would occur.

Monorail Transit Maintenance and Storage Facility Design Option 1 (Alternatives 1 and 3)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF Design Option 1 would not be located on land designated as an LRA or VHFHSZ and would not have potential to cause wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 4.0 miles south of the proposed MSF Design Option 1. Therefore, the operation and construction of the proposed MSF Design Option 1 would not intensify slope, prevailing winds, and other factors that exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, and no impact would occur.

Electric Bus Maintenance and Storage Facility (Alternative 1)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed Electric Bus MSF would not be located on land designated as an LRA or VHFHSZ and would not have potential to cause wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 3.1 miles north of the proposed Electric Bus MSF. Therefore, the operation and construction of the proposed Electric Bus MSF would not intensify slope, prevailing winds, and other factors that exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, and no impact would occur.

Heavy Rail Transit Maintenance and Storage Facility (Alternatives 4, 5, and 6)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 4.2 miles south of the MSF. Therefore, the operation and construction of the proposed MSF would not intensify slope, prevailing winds, and other factors that exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire, and no impact would occur.

3.18.5.3 Impact WFR-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Project Alternatives

No Project Alternative

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational Impacts

Operations for the Metro Line 761 would occur along active roadways where associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) already exist and would not require additional infrastructure to support operations of the No Project Alternative. Therefore, no impacts related to the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment associated with the No Project Alternative would take place during operations.

Construction Impacts

Under the No Project Alternative, the Project would not be constructed. There could be minor improvements to Metro Line 761 infrastructure including bus stops, but that would be located off the street. The No Project Alternative would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impacts related to the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment associated with the No Project Alternative would take place during construction.

Alternative 1

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Operation of Alternative 1 would require the maintenance of roads, fuel breaks, emergency water sources, and other utilities associated with infrastructure to support project elements, including the proposed alignment, stations, and TPSS sites. Operational activities associated with the implementation of Alternative 1 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ.

While Alternative 1 would be located within an VHFHSZ zone, a majority of the project elements and aerial guideway would be located in existing paved areas within I-405. Alternative 1 would install three TPSSs within the VHFHSZ that would be located north of the proposed Getty Center Station, east of the intersection between Promontory Road and Sepulveda Boulevard, and north of the Skirball Center Drive

overpass. A TPSS is an electrical substation that would convert electric power to an appropriate voltage to power the proposed monorail. Equipment malfunction associated with the TPSSs could create sparks and could potentially ignite the fuel sources at the undeveloped areas in the Santa Monica Mountains.

PM SAF-1 (Section 3.18.3) would ensure that Alternative 1 would reduce wildfire risks through Metro's compliance with all regulations of the California Health and Safety Code Sections 13000 et seq. and the LAMC pertaining to fire protection systems during operations. Compliance with all state laws, plans, policies, and regulations regarding fire prevention and suppression, as well as compliance with PM SAF-1 (Section 3.18.3), would ensure that the impact associated with fire risk would be less than significant during operational activities.

Construction Impacts

Construction of Alternative 1 would require the installation of roads, fuel breaks, emergency water sources, and other utilities associated with infrastructure to support project elements, including the proposed alignment, the proposed Getty Center Station, and the proposed TPSS sites. Ignition sources during construction of Alternative 1 would include surface-level or aboveground welding activities and hot exhaust from a vehicle or motorized equipment parked on dry grass; additionally, welding during high winds could send sparks traveling through the air to land on and ignite dry grass. Construction activities occurring within the vegetated areas of the Sepulveda Pass could exacerbate the potential risk of wildfire due to the construction activities, equipment, and worker vehicles by adding to ignition sources within the area, if not properly controlled. Ignition from construction activity could exacerbate wildfire risk that may result in temporary and potentially significant impacts to the environment.

To reduce the impacts related to wildfires, Alternative 1 would implement MM SAF-1 and MM SAF-2 (Section 3.18.6). MM SAF-1 and MM SAF-2 provide construction-related protocols that would curtail work under red-flag warning days and maintain and monitor potential sources of fuel and ignition in order to reduce impacts related to exacerbating wildfire risks to a less than significant level. The implementation of MM SAF-1 and MM SAF2 would ensure that the impacts associated with fire risks would be less than significant during construction activities with mitigation.

Alternative 3

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Operation of Alternative 3 would require the same maintenance infrastructure and activities as Alternative 1. Please refer to the Operational Impacts section in Alternative 1 for details on maintenance infrastructure and activities that would contribute to Alternative 3 wildfire risks. Compliance with all state laws, plans, policies, and regulations regarding fire prevention and suppression, as well as compliance with PM SAF-1 (Section 3.18.3) would ensure that the impact associated with fire risk would be less than significant during operational activities.

Construction Impacts

Construction of Alternative 3 would require the same temporary infrastructure and associated fire minimization measures as Alternative 1. Please refer to the Construction Impacts section in Alternative 1 for details on construction activities that would contribute to Alternative 3 wildfire risks and associated

avoidance measures. The implementation of MM SAF-1 and MM SAF2 (Section 3.18.6) would ensure that the impacts associated with fire risks would be less than significant during construction activities with mitigation.

Alternative 4

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Operational activities associated with the implementation of Alternative 4 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. A majority of the alignment in the VHFHSZ would be underground at the depth of the tunnel where no impacts related to the exacerbation of wildfires are anticipated. However, the tunnel portal at Del Gado Drive, south of the proposed Ventura Boulevard Station, would be located in the VHFHSZ, within a developed area with some open space areas. Operation of Alternative 4 would require the maintenance of roads, fuel breaks, emergency water sources, and other utilities associated with infrastructure to the proposed alignment and tunnel portal.

Alternative 4 would introduce the tunnel portal within the VHFHSZ; the portal would consist of reinforced concrete and rail. Reconstruction of the surrounding roadway would also occur. Project elements associated with the tunnel portal and roadway are not prone to flammability nor would they consist of electrical components that would be a source of ignition. No impacts are anticipated related to the exacerbation of wildfires. Regardless, as required by law, Alternative 4 would implement PM SAF-1. PM SAF-1 would ensure that Alternative 4 would reduce wildfire risks through Metro's compliance with all regulations set forth by the State of California and City of Los Angeles. Compliance with all state laws, plans, policies, and regulations regarding fire prevention and suppression, as well as compliance with PM SAF-1, would ensure that the impact associated with fire risk would be less than significant during operational activities.

Construction Impacts

Construction of Alternative 4 would require the installation of roads, fuel breaks, emergency water sources, and other utilities associated with infrastructure to support project elements, including the proposed alignment, stations, and TPSS sites. A majority of the alignment in the VHFHSZ would be underground at the depth of the tunnel where no impacts related to the exacerbation of wildfires are anticipated. Construction activities and construction equipment used to build the tunnel portal would be located approximately at 15341 Del Gado Drive.

Potential ignition sources include surface-level or aboveground welding activities and hot exhaust from a vehicle or motorized construction equipment parked on dry grass; additionally, welding during high winds could send sparks traveling through the air to land on and ignite dry grass. Construction activities occurring within the vegetated areas of the Sepulveda Pass could exacerbate the potential risk of wildfire due to the ignition sources previously described. Construction activities could exacerbate wildfire risk that may result in temporary and potentially significant impacts to the environment.

To reduce the impacts related to wildfires, Alternative 4 would implement MM SAF-1 and MM SAF-2 (Section 3.18.6). MM SAF-1 and MM SAF-2 provide construction-related protocols that would curtail

work under red-flag warning days and maintain and monitor potential sources of fuel and ignition to reduce impacts related to exacerbating wildfire risks to a less than significant level.

Construction activities would comply with existing regulations that restrict periods of activity to times that are not a high fire risk. In addition, the implementation of MM SAF-1 and MM SAF-2 would ensure that the impacts associated with fire risks would be less than significant during construction activities with mitigation.

Alternative 5

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational Impacts

The Alternative 5 alignment and associated infrastructure within the VHFHSZ would be underground at the depth of the tunnel where no impacts related to the exacerbation of wildfires are anticipated. Additionally, Alternative 5 would comply with all state laws, plans, policies, and regulations regarding fire prevention and suppression, as well as compliance with PM SAF-1, would ensure that the impact associated with fire risk would be less than significant during operational activities. Alternative 5 would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk in a VHFHSZ. Therefore, there would no impact during operations.

Construction Impacts

The Alternative 5 alignment and associated infrastructure within the VHFHSZ would be underground at the depth of the tunnel where no impacts related to the exacerbation of wildfires are anticipated. Alternative 5 would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk in a VHFHSZ. Therefore, there would be no impact during construction.

Alternative 6

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant with Mitigation

Operational Impacts

Operational activities associated with the implementation of Alternative 6 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. Operation of Alternative 6 would require the maintenance of roads, fuel breaks, emergency water sources, and other utilities associated infrastructure to support project elements, including the proposed alignment, ventilation shaft, and access road.

The Alternative 6 alignment would be underground at the depth of the tunnel and would not exacerbate fire risks. However, some project elements, including the ventilation shaft, two TPSS locations, and the access road would be located within the private open space areas designated for the Stone Canyon Reservoir east of I-405 and Sepulveda Boulevard. A TPSS is an electrical substation that would convert electric power to an appropriate voltage to power the proposed monorail. Equipment malfunction

associated with the TPSSs could create sparks and could potentially ignite the fuel sources at the undeveloped areas in the Santa Monica Mountains. PM SAF1 (Section 3.18.3) would ensure that Alternative 6 would reduce wildfire risks through Metro's compliance with all regulations of the California Health and Safety Code Sections 13000 et seq. and the LAMC pertaining to fire protection systems during operations.

Compliance with all state laws, plans, policies, and regulations regarding fire prevention and suppression, as well as compliance with PM SAF-1, would ensure that the impact associated with fire risk would be less than significant.

Construction Impacts

Construction activities associated with the implementation of Alternative 6 would be located within the Wildfire Hazard Zone and have the potential for wildfires. While the proposed alignment would be constructed underground at the depth of the proposed tunnel, the ventilation shaft and its access road would require construction in open space areas. The Stone Canyon Reservoir is located south of Mulholland Drive and features an elevated slope and height above sea level, and steepness of land that can increase the spread of fire by influencing a fire's intensity, direction, and rate of spread.

Construction activities occurring within the vegetated areas of the Stone Canyon Reservoir could exacerbate the potential risk of wildfire by adding to ignition sources within the area if not properly controlled. Potential ignition sources include surface-level welding activities and hot exhaust from a vehicle or motorized construction equipment parked on dry grass; additionally, welding during high winds could send sparks traveling through the air to land on and ignite dry grass. Wildfire ignition from construction activity could exacerbate wildfire risk that may result in temporary and potentially significant impacts to the environment.

To minimize the impacts related to wildfires, Alternative 6 would implement MM SAF-1 and MM SAF-2 (Section 3.18.6). MM SAF-1 and MM SAF-2 provide construction-related protocols that would curtail work under red-flag warning days and maintain and monitor potential sources of fuel and ignition to reduce impacts related to exacerbating wildfire risks to a less than significant level. In addition, the implementation of MM SAF-1 and MM SAF2 would ensure that the impacts associated with fire risks would be less than significant with mitigation.

Maintenance and Storage Facilities

Monorail Transit Maintenance and Storage Facility Base Design (Alternatives 1 and 3)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF Base Design would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 4.0 miles south of the MSF Base Design. The proposed MSF Base Design would wash and maintain monorail vehicles and require installation of associated infrastructure. Therefore, the operation and construction of the MSF Base Design would not require the installation or maintenance of associated infrastructure that would exacerbate wildfire risks or that may result in temporary or ongoing impacts to the environment, and no impact would occur.

Monorail Transit Maintenance and Storage Facility Design Option 1 (Alternatives 1 and 3)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF Design Option 1 would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 4.0 miles south of the proposed MSF Design Option 1. The proposed MSF Design Option 1 would wash and maintain monorail vehicles and require installation of associated infrastructure. Therefore, the operation and construction of the MSF Design Option 1 would not require the installation or maintenance of associated infrastructure that would exacerbate wildfire risks or that may result in temporary or ongoing impacts to the environment, and no impact would occur.

Electric Bus Maintenance and Storage Facility (Alternative 1)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed Electric Bus MSF would not be located on land designated as a LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 3.1 miles north of the proposed Electric Bus MSF. The proposed Electric Bus MSF would wash and maintain monorail vehicles and require installation of associated infrastructure. Therefore, the operation and construction of the Electric Bus MSF would not require the installation or maintenance of associated infrastructure that would exacerbate wildfire risks or that may result in temporary or ongoing impacts to the environment, and no impact would occur.

Heavy Rail Transit Maintenance and Storage Facility (Alternatives 4, 5, and 6)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 4.2 miles south of the MSF. The proposed MSF would wash and maintain heavy rail transit (HRT) vehicles and require installation of associated infrastructure. Therefore, the operation and construction of the MSF would not require the installation or maintenance of associated infrastructure that would exacerbate wildfire risks or that may result in temporary or ongoing impacts to the environment, and no impact would occur.

3.18.5.4 Impact WFR-4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Project Alternatives

No Project Alternative

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational Impacts

The discussions on exposure of people or structures to flooding as a result of runoff or drainage changes are in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c). The discussion on exposure of people or structures to landslides is in the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, Seismic, and Paleontological Resources Technical Report* (Metro, 2025d). The remainder of this discussion analyzes post-fire slope instability.

The No Project Alternative would traverse the Santa Monica Mountains, which CAL FIRE has partially designated as a Wildfire Hazard Zone shown on Figure 3.18-1 with a classification of VHFHSZ. Additionally, as shown on Figure 3.18-2, this segment of the Santa Monica Mountains has historically experienced wildfires, including the 2025 Palisades Fire, 2025 Sepulveda Fire, 2019 Getty Fire, and the 2017 Skirball Fire (CAL FIRE, 2017, 2019, 2025a, 2025b). However, the operation of the No Project Alternative would include operation of Metro Line 761 within the limits of paved area on Sepulveda Boulevard within the Sepulveda Pass. Therefore, the No Project Alternative would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Therefore, no impacts related to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes associated with the No Project Alternative occur during operations.

Construction Impacts

Under the No Project Alternative, the Project would not be constructed. There could be minor improvements to Metro Line 761 infrastructure including bus stops, but that would be located off the street. Therefore, no impacts related to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes associated with the No Project Alternative would take place during construction.

Alternative 1

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant

Operational Impacts

The discussions on exposure of people or structures to flooding as a result of runoff or drainage changes are in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c). The

discussion on exposure of people or structures to landslides is in the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, Seismic, and Paleontological Resources Technical Report* (Metro, 2025d). The remainder of this discussion analyzes post-fire slope instability.

Alternative 1 would traverse the Santa Monica Mountains, which CAL FIRE has partially designated as a Wildfire Hazard Zone shown on Figure 3.18-1 with a classification of VHFHSZ. The elevated guideway would be partially located within the median of I-405 in the Wildfire Hazard Zone. However, the proposed Getty Center Station and the aerial guideway between the southbound I-405 Getty Center Drive off-ramp and Skirball Center Drive would traverse above the toe of the Santa Monica Mountains. As shown on Figure 3.18-3, this segment of the Santa Monica Mountains has historically experienced wildfires, including the 2019 Getty Fire that burned approximately 745 acres in the Santa Monica Mountains and started near the southbound I-405 Getty Center Drive off-ramp (CAL FIRE, 2019; LAFD, 2019). The wildfire burned on the west side of Sepulveda Boulevard and I-405 in the Sepulveda Pass canyon. The 2025 Palisades Fire was located outside of the Resource Study Area and would not impact the infrastructure related to Alternative 1 (CAL FIRE, 2025a). Alternative 1 would primarily be located within I-405 right-of-way and would not propose to build any infrastructure in the 2025 Sepulveda Fire or the 2017 Skirball Fire burn area. Therefore, Alternative 1 would have no impact on post-fire slope instability as a result of the 2025 Sepulveda Fire (CAL FIRE, 2025b) 2017 Skirball fire (CAL FIRE, 2017).

There is a high risk of downslope landslides due to loss of root reinforcement after loss of vegetation during a wildfire. The loss of root reinforcement may last for several years after a wildfire, depending on the fire regime, plants' resistivity, and their regrowth rate (Abdollahi and Vahedifard, 2023).

While the Getty Fire occurred in 2019, existing post-wildfire ground instabilities from the Getty Fire have the potential to impact proposed infrastructure related to Alternative 1 in the affected areas. A comparative analysis utilizing Google Earth satellite imagery was conducted to visualize and assess vegetation within the Sepulveda Pass prior to the Getty Fire in April 2019, approximately a month after the Getty Fire in November 2019, and the existing conditions in 2024. The areas surrounding the Sepulveda Pass consist of undeveloped land that has natural habitats (e.g., grasslands, sage scrub) that experience extended droughts. These conditions — combined with the characteristic of the region's Mediterranean climate — result in large areas of dry vegetation. Prior to the Getty Fire in April 2019, the Sepulveda Pass appears to have had a sparse amount of vegetation. Following the Getty Fire, the wildfire's burn marks accompanied the absence of vegetation spanning from the foothill to the ridge and beyond the hillside where Alternative 1 would be located. Current satellite images depict regrowth of vegetation, similar and even more robust than what was shown in April 2019, that would reinforce the hillside's slope stability following the Getty Fire.

Design of the aerial guideway would be consistent with American Society of Civil Engineers (ASCE) 21 Automated People Mover Standards requirements (ASCE, 2021) and the design of the proposed Getty Center Station would be consistent with the CBC. Provisions from these standards require site-specific geotechnical evaluation during the final design phase and would include specific structural engineering recommendations. The foundation type for the aerial guideway and proposed Getty Center Station would be determined as part of the required geotechnical investigation conducted during the final design phase and would ensure that the potential for post-fire ground instabilities would not cause potential for significant impacts. Alternative 1 would adhere to existing regulations and provisions listed in the ASCE, CBC, and equivalent design criteria such as the MRDC. Therefore, the potential impacts related to Alternative 1's exposure of people or structures to significant risks — including downslope or

downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes — would be less than significant during operations.

Construction Impacts

The discussion on risks related to runoff and drainage is described in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c). The discussion on risk related to flooding and landslides is described in the *Sepulveda Transit Corridor Geotechnical, Subsurface, Seismic*, *and Paleontological Resources Technical Report* (Metro, 2025d). The remainder of this discussion analyzes post-fire slope instability.

During construction, to address potential post-wildfire ground instabilities that may have resulted from the 2019 Getty Fire, Alternative 1 would implement project design features and would implement a *Stormwater Pollution Prevention Plan* (SWPPP). As described in further detail in *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c), regulatory framework set forth by the State Water Resources Control Board (SWRCB) would require Alternative 1 to prepare and submit a construction SWPPP to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. A construction SWPPP must be submitted to the SWRCB prior to construction and adhered to during construction. The construction SWPPP would identify the best management practices (BMP) that would be in place prior to the start of construction activities and during construction. BMPs categories would include erosion control, sediment control, non-stormwater management, and materials management BMPs. Although specific temporary construction-related BMPs would be selected at the time of SWPPP preparation, potential BMPs to address post-fire wild instability would likely include fiber rolls, bonded-fiber matrix hydroseeding, erosion control mats or blankets, mulching, nature-based soil stabilization, soil stabilization. Such BMPs would manage erosion during significant rainfall events. The construction of Alternative 1 would include the implementation of BMPs and would not create additional runoff, post-fire slope instability, or drainage changes within the Wildfire Hazard Zone. Alternative 1 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, impacts would be less than significant.

Alternative 3

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant

Operational Impacts

Operation of Alternative 3 would have similar potential risks as Alternative 1 related to downslope or downstream flooding or landslides due post-fire slope instability (Refer to Figure 3.18-4 that illustrates the wildfires within and near the Alternative 3 Resource Study Area in recent history). The Alternative 3 tunnel portal would not be located within the burn area of the 2025 Sepulveda Fire. Unlike Alternative 1, the Alternative 3 tunnel portal would be located within the areas where the 2017 Skirball Fire occurred. Prior to the Skirball Fire in April 2017, the Sepulveda Pass appears to have sparse amount of vegetation. Following the Skirball Fire, the wildfire's burn marks accompanied by the absence of vegetation where the Alternative 3 portal would be located. In 2024, the current regrowth of vegetation, similar and even more robust than what was shown in April 2017, that would reinforce the hillside's slope stability following the Skirball Fire. Please refer to the Operational Impacts section in Alternative 1 for details on post-fire conditions in the Sepulveda Pass. Adherence to applicable design

requirements and criteria would ensure that the impact associated with post-fire slope instability or drainage changes would be less than significant during operational activities.

Construction Impacts

Construction of Alternative 3 would require the same drainage features as Alternative 1, including implementation of a SWPPP. Please refer to the Construction Impacts section in Alternative 1 for details on construction activities and associated design features and BMPs to address drainage and slope instability during construction. Alternative 3 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, impacts would be less than significant.

Alternative 4

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant

Operational Impacts

The discussions on exposure of people or structures to flooding as a result of runoff or drainage changes are in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c). The discussion on exposure of people or structures to landslides is in the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, Seismic, and Paleontological Resources Technical Report* (Metro, 2025d). The remainder of this discussion analyzes post-fire slope instability.

Operational activities associated with the implementation of Alternative 4 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. A majority of the proposed alignment would be located underground at the depth of the tunnel where Alternative 4 would not create additional post-fire slope instability within the Wildfire Hazard Zone. However, the portal structure and aerial alignment between Del Gado Drive and Valley Vista Boulevard would be in a Wildfire Hazard Zone. As shown on Figure 3.18-5, fire incidents have occurred further south from the proposed portal structure location. Wildfires in recent history include the 2025 Palisades Fire, 2025 Sepulveda Fire, 2019 Getty Fire, and 2017 Skirball Fire (CAL FIRE, 2017, 2019, 2025a, 2025b). Since no fires have occurred where the Alternative 4 proposed portal structure is located, post-fire slope instability would be less than significant. The operation of Alternative 4 would not create additional runoff, post-fire slope instability, or drainage changes within the Wildfire Hazard Zone. Alternative 4 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, impacts would be less than significant.

Construction Impacts

The discussions on exposure of people or structures to flooding as a result of runoff or drainage changes are in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c). The discussion on exposure of people or structures to landslides is in the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, Seismic, and Paleontological Resources Technical Report* (Metro, 2025d). The remainder of this discussion analyzes post-fire slope instability.

Construction activities associated with the implementation of Alternative 4 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. A majority of the proposed alignment would be located underground at the depth of the tunnel underneath

vegetated areas east of I-405. However, the transition structure and aerial alignment between Del Gado Drive and Valley Vista Boulevard would be in a Wildfire Hazard Zone. Fire incidents have not occurred in this location in recent history (CAL FIRE, 2017, 2019, 2025a, 2025b); therefore, post-fire slope instability would be less than significant.

Additionally, during construction, the Project would implement project design features and would implement an SWPPP. As described in further detail in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c), regulatory framework set forth by the SWRCB would require Alternative 4 to prepare and submit a construction SWPPP to comply with the NPDES Construction General Permit. A construction SWPPP must be submitted to the SWRCB prior to construction and adhered to during construction. The construction SWPPP would identify the BMPs that would be in place prior to the start of construction activities and during construction. BMPs are identified in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c) with categories that would include erosion control, sediment control, non-stormwater management, and materials management BMPs.

The construction of Alternative 4 would include adherence to existing regulations and proper the implementation of BMPs and would not create additional runoff, post-fire slope instability, or drainage changes within the Wildfire Hazard Zone. Alternative 4 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, impacts would be less than significant.

Alternative 5

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational Impacts

Operational activities associated with the implementation of Alternative 5 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. As shown on Figure 3.18-6, fire incidents that have occurred in recent history includes the 2025 Palisades Fire, 2025 Sepulveda Fire, 2019 Getty Fire, and 2017 Skirball Fire (CALFIRE, 2017, 2019, 2025a, 2025b). However, the proposed alignment would be located underground at the depth of the tunnel underneath vegetated areas east of I-405. Due to its underground configuration, the operation of Alternative 5 would not create additional runoff, post-fire slope instability, or drainage changes within the Wildfire Hazard Zone. Alternative 5 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, there would be no impact.

Construction Impacts

Construction activities associated with the implementation of Alternative 5 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. However, the proposed alignment would be located underground at the depth of the tunnel underneath vegetated areas east of I-405. Due to its underground configuration, the construction of Alternative 5 would not create additional runoff, post-fire slope instability, or drainage changes within the Wildfire Hazard Zone. Alternative 5 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, there would be no impact.

Alternative 6

Impact Statement

Operational Impact: Less than Significant

Construction Impact: Less than Significant

Operational Impacts

The discussions on exposure of people or structures to flooding as a result of runoff or drainage changes are in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c). The discussion on exposure of people or structures to landslides is in the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, Seismic, and Paleontological Resources Technical Report* (Metro, 2025d). The remainder of this discussion analyzes post-fire slope instability.

Operational activities associated with the implementation of Alternative 6 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. The proposed alignment would be located underground at the depth of the tunnel underneath vegetated areas east of I-405. The Stone Canyon Reservoir vent shaft, TPSS, and access road would be located on surface level within the Wildfire Hazard Zone in the Santa Monica Mountains. As shown on Figure 3.18-7, fire incidents have occurred further west from the Stone Canyon Reservoir. Wildfires in recent history includes the 2025 Palisades Fire, 2025 Sepulveda Fire, 2019 Getty Fire, and 2017 Skirball Fire (CAL FIRE, 2017, 2019, 2025a, 2025b). Since no fires have occurred where the Alternative 6 Stone Canyon Reservoir vent shaft, TPSS, and access road would be located, post-fire slope instability in this location would be less than significant. The operation of Alternative 6 would not create additional runoff, post-fire slope instability, or drainage changes within the Wildfire Hazard Zone. Alternative 6 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, impacts would be less than significant.

Construction Impacts

The discussions on exposure of people or structures to flooding as a result of runoff or drainage changes are in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c). The discussion on exposure of people or structures to landslides is in the *Sepulveda Transit Corridor Project Geotechnical, Subsurface, Seismic, and Paleontological Resources Technical Report* (Metro, 2025d). The remainder of this discussion analyzes post-fire slope instability.

Construction activities associated with the implementation of Alternative 6 would occur within the Wildfire Hazard Zone shown on Figure 3.18-1, which CAL FIRE has designated as a VHFHSZ. The proposed alignment would be located underground at the depth of the tunnel underneath vegetated areas east of I-405. The Stone Canyon Reservoir vent shaft, TPSS, and access road would be located on surface level within the Wildfire Hazard Zone in the Santa Monica Mountains. Fire incidents have not occurred in the Stone Canyon Reservoir in recent history; therefore, post-fire slope instability in this location would be less than significant.

Additionally, during construction, to address potential post-wildfire ground instabilities, Alternative 6 would implement project design features and would implement an SWPPP. As described in further detail in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c), regulatory framework set forth by the SWRCB would require Alternative 6 to prepare and submit a construction SWPPP to comply with the NPDES Construction General Permit. A construction SWPPP must be submitted to the SWRCB prior to construction and adhered to during construction. The

construction SWPPP would identify the BMPs that would be in place prior to the start of construction activities and during construction. BMPs are identified in the *Sepulveda Transit Corridor Project Water Resources Technical Report* (Metro, 2025c) with categories that would include erosion control, sediment control, non-stormwater management, and materials management BMPs. the construction of Alternative 6 would include the implementation of BMPs and would not create additional runoff, post-fire slope instability, or drainage changes within the Wildfire Hazard Zone. Alternative 6 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. Therefore, impacts would be less than significant.

Maintenance and Storage Facilities

Monorail Transit Maintenance and Storage Facility Base Design (Alternatives 1 and 3)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF Base Design would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 4 miles south of the MSF Base Design. The MSF Base Design would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts would occur.

Monorail Transit Maintenance and Storage Facility Design Option 1 (Alternatives 1 and 3)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF Design Option 1 would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 4 miles south of the proposed MSF Design Option 1. The MSF Design Option 1 would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts would occur.

Electric Bus Maintenance and Storage Facility (Alternative 1)

Impact Statement

Operational and Construction Impacts

The proposed Electric Bus MSF would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 3.1 miles north of the proposed Electric Bus MSF. The Electric Bus MSF would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts would occur.

Heavy Rail Transit Maintenance and Storage Facility (Alternatives 4, 5, and 6)

Impact Statement

Operational Impact: No Impact

Construction Impact: No Impact

Operational and Construction Impacts

The proposed MSF would not be located on land designated as an LRA or VHFHSZ and would not have potential for wildfires. The closest areas designated as an SRA or land classified as VHFHSZ are located approximately 4.2 miles south of the proposed MSF. The MSF would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impact would occur.

3.18.6 Mitigation Measures

Under each of the alternatives, there would be potential construction activities that pose potential wildfire risks. Therefore, the following mitigation measures were developed to address potential wildfire impacts during construction.

MM SAF-1: *Curtail above ground construction and maintenance activities requiring spark-producing equipment during high-risk wildfire periods in applicable areas. Applicable areas would be areas in the Santa Monica Mountain Range that the California Department of Forestry and Fire Protection designates as a wildfire zone and is populated with dried vegetation or other material that could ignite. Construction and maintenance activities utilizing motorized equipment shall be curtailed during red-flag warning days and other high-risk periods characterized by relative humidity of 15 percent or less combined with windy conditions consisting of frequent gusts at 25 miles per hour or greater for at least 3 hours in a 12 hour period.*

MM SAF-2: *During construction of the Project, all staging areas, welding areas, or areas slated for development that use spark-producing equipment shall be cleared of dried vegetation or other material that could ignite. Any construction equipment that includes a spark arrestor shall be monitored to ensure the spark arrestor is in good working order. All vehicles and crews working on the project site shall have access to functional fire extinguishers at all times.*

MM TRA-4: *The project contractor shall prepare a Transportation Management Plan to facilitate the flow of traffic and transit service in and around construction zones. The Transportation Management Plan shall include, at a minimum, the following measures:*

- *Where feasible, schedule construction-related travel (i.e., deliveries, hauling, and worker trips) during off-peak hours and maintain two-way traffic circulation along affected roadways during peak hours. Avoid the closure of two major adjacent streets where feasible.*

- *Designated routes for project haul trucks shall primarily utilize the I-405, I-10, and US-101 corridors. Throughout the construction process, these routes shall be coordinated with the City of Los Angeles and Veterans Affairs to ensure consistency with land use and mobility plans. Additionally, the routes shall be situated to minimize noise, vibration, and other possible impacts.*
- *Develop detour routes to facilitate traffic movement through construction zones without significantly increasing cut-through-traffic in adjacent residential areas.*
- *Where construction encroaches on the Los Angeles-San Diego-San Luis Obispo rail corridor right-of-way, coordinate construction activities with Union Pacific, Metrolink, and Amtrak to minimize disruptions to service and coordinate on outreach to inform passengers of service impacts. Provide temporary parking and drop-off facilities at the Van Nuys Metrolink/Amtrak Station to minimize passenger impacts.*
- *Develop and implement an outreach program and public awareness campaign in coordination with Caltrans, the City of Los Angeles, the City of Santa Monica, and the County of Los Angeles to inform the general public about the construction process and planned roadway closures, potential impacts, and mitigation measures, including temporary bus stop relocation.*
- *Where feasible, temporarily restripe roadways to maximize the vehicular capacity at locations affected by construction closures.*
- *Provide wayfinding signage, lighting, and access to specify pedestrian safety amenities (such as handrails, fences, and alternative walkways) during construction.*
- *Where construction encroaches on pedestrian facilities, special pedestrian safety measures shall be used, such as detour routes and temporary pedestrian barricades.*
- *Where construction encroaches onto the University of California, Los Angeles campus, the project contractor shall ensure that access to campus buildings is maintained through temporary decking and the construction of temporary stairs and ramps.*
- *During final design, the project contractor shall coordinate with Metro Operations to minimize construction impacts on existing Metro rail operations in and around existing stations. Where construction results in the interruption of Metro rail operations, buses shall provide temporary service between rail stations.*
- *Provide on-street bicycle detour routes and signage to address temporary effects to bicycle circulation and minimize inconvenience (e.g., lengthy detours) as to minimize users potentially choosing less safe routes if substantially rerouted.*

- *During final design, the project contractor shall coordinate with first responders and emergency service providers to minimize impacts on emergency response. Coordination efforts shall include the development of detour routes and notification procedures to facilitate and ensure safe and efficient traffic movement. The nearest local first responders would be notified, as appropriate, of traffic control plans during construction to coordinate emergency response routing.*
- *Maintain customer and delivery access to all operating businesses near construction work areas. Access shall be maintained to allow for reasonable business operations, including clear signage for alternate routes, temporary driveways, or entry points as necessary. Coordination with businesses shall be conducted to address specific access needs and minimize disruptions, ensuring that any restrictions are communicated in advance and alternative arrangements are provided as appropriate.*

Impacts After Mitigation

Compliance with all state laws, plans, policies, and regulations regarding wildfire prevention and suppression, as well as implementation of PM SAF-1, for Alternatives 1, 3, 4, 5, or 6 would ensure that impacts associated with wildfire and fire risks would be less than significant during operational activities.

Implementation of MM SAF-1 and MM SAF-2 would ensure that the impacts associated with wildfire and fire risks would be less than significant during construction activities for Alternatives 1, 3, 4, or 6.

Adherence to existing regulations and implementation of the TMP (MM TRA-4; refer to the *Sepulveda Transit Corridor Project Transportation Technical Report* [Metro, 2025b]) would ensure that Alternatives 1, 3, 4, 5, or 6 would provide adequate access for emergency vehicles. The impact would be less than significant during construction activities for Alternatives 1, 3, 4, 5, or 6.

Table 3.18-1. Summary of Mitigation Measures and Impacts Before and After Mitigation for the Project Alternatives

CEQA Impact Topic		No Project	Alt 1	Alt 3	Alt 4	Alt 5	Alt 6
Operational							
Impact WFR-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Impacts Before Mitigation	NI	LTS	LTS	LTS	LTS	LTS
	Applicable Mitigation	NA	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	LTS	LTS	LTS	LTS	LTS
Impact WFR-2: Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Impacts Before Mitigation	LTS	LTS	LTS	LTS	LTS	LTS
	Applicable Mitigation	NA	NA	NA	NA	NA	NA
	Impacts After Mitigation	LTS	LTS	LTS	LTS	LTS	LTS
Impact WFR-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Impacts Before Mitigation	NA	LTS	LTS	LTS	NI	LTS
	Applicable Mitigation	NA	NA	NA	NA	NA	NA
	Impacts After Mitigation	LTS	LTS	LTS	LTS	NI	LTS
Impact WFR-4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Impacts Before Mitigation	NI	LTS	LTS	LTS	LTS	LTS
	Applicable Mitigation	NA	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	LTS	LTS	LTS	NI	LTS
Construction							
Impact WFR-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Impacts Before Mitigation	NI	PS	PS	PS	PS	PS
	Applicable Mitigation	NA	MM TRA-4	MM TRA-4	MM TRA-4	MM TRA-4	MM TRA-4
	Impacts After Mitigation	NI	LTS	LTS	LTS	LTS	LTS
Impact WFR-2: Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to	Impacts Before Mitigation	LTS	PS	PS	PS	LTS	PS
	Applicable Mitigation	NA	MM SAF-1 MM SAF-2	MM SAF-1 MM SAF-2	MM SAF-1 MM SAF-2	NA	MM SAF-1 MM SAF-2

CEQA Impact Topic		No Project	Alt 1	Alt 3	Alt 4	Alt 5	Alt 6
pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Impacts After Mitigation	LTS	LTS	LTS	LTS	LTS	LTS
Impact WFR-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Impacts Before Mitigation	NA	PS	PS	PS	NI	PS
	Applicable Mitigation	NA	MM SAF-1 MM SAF-2	MM SAF-1 MM SAF-2	MM SAF-1 MM SAF-2	NA	MM SAF-1 MM SAF-2
	Impacts After Mitigation	LTS	LTS	LTS	LTS	NI	LTS
Impact WFR-4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Impacts Before Mitigation	NI	LTS	LTS	LTS	NI	LTS
	Applicable Mitigation	NA	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	LTS	LTS	LTS	NI	LTS

Source: HTA, 2024

LTS = less than significant
MM = mitigation measure
NA = not applicable
NI = no Impact
PS = potentially significant
SAF = safety and security
SU = significant and unavoidable
TRA = transportation
WFR = wildfire

Table 3.18-2. Summary of Mitigation Measures and Impacts Before and After Mitigation for the Maintenance and Storage Facilities

CEQA Impact Topic		MRT MSF Base Design (Alts 1 and 3)	MRT MSF Design Option 1 (Alts 1 and 3)	Electric Bus MSF (Alt 1)	HRT MSF (Alts 4 and 5)	HRT MSF (Alt 6)
Operational						
Impact WFR-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Impacts Before Mitigation	LTS	LTS	LTS	LTS	LTS
	Applicable Mitigation	NA	NA	NA	NA	NA
	Impacts After Mitigation	LTS	LTS	LTS	LTS	LTS
Impact WFR-2: Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Impacts Before Mitigation	NI	NI	NI	NI	NI
	Applicable Mitigation	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	NI	NI	NI	NI
Impact WFR-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Impacts Before Mitigation	NI	NI	NI	NI	NI
	Applicable Mitigation	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	NI	NI	NI	NI
Impact WFR-4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Impacts Before Mitigation	NI	NI	Ni	NI	NI
	Applicable Mitigation	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	NI	NI	NI	NI
Construction						
Impact WFR-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Impacts Before Mitigation	PS	PS	PS	PS	PS
	Applicable Mitigation	MM-TRA-4	MM-TRA-4	MM-TRA-4	MM-TRA-4	MM-TRA-4
	Impacts After Mitigation	LTS	LTS	LTS	LTS	LTS

CEQA Impact Topic		MRT MSF Base Design (Alts 1 and 3)	MRT MSF Design Option 1 (Alts 1 and 3)	Electric Bus MSF (Alt 1)	HRT MSF (Alts 4 and 5)	HRT MSF (Alt 6)
Impact WFR-2: Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Impacts Before Mitigation	NI	NI	NI	NI	NI
	Applicable Mitigation	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	NI	NI	NI	NI
Impact WFR-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Impacts Before Mitigation	NI	NI	NI	NI	NI
	Applicable Mitigation	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	NI	NI	NI	NI
Impact WFR-4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Impacts Before Mitigation	NI	NI	Ni	NI	NI
	Applicable Mitigation	NA	NA	NA	NA	NA
	Impacts After Mitigation	NI	NI	NI	NI	NI

Source: HTA, 2024

LTS = less than significant
MM = mitigation measure
NA = not applicable
NI = no Impact
PS = potentially significant
TRA = transportation
WFR = wildfire