# 5. OTHER CEQA CONSIDERATIONS

This FD EIR chapter addresses additional requirements that must be considered to satisfy the *California Environmental Quality Act* (CEQA). This chapter identifies the following CEQA requirements that pertain to the operational (long-term) and construction-phase (short-term, temporary) implications of the project:

- Significant Unavoidable Adverse Impacts
- Significant Irreversible Environmental Impacts
- Growth-Inducing Impacts
- Cumulative Impacts
- Environmentally Superior Alternative
- Areas of Controversy/Issues to Be Resolved

## 5.1 Significant Unavoidable Adverse Impacts

Section 15126.2(b) of the CEQA Guidelines states:

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

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Environmental impacts associated with implementation of a project may not always be mitigated to a level that is considered less than significant (either through the imposition of project-specific mitigation measures or through the imposition of an alternative project design).

Pursuant to Section 15091(a) of the CEQA Guidelines, if an EIR that has been certified for a project identifies one or more significant environmental effects, the lead agency must adopt "Findings of Fact." For each significant impact, the Lead Agency must make one of the following findings:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding. The Findings of Fact are presented in a separate stand-alone document that will be presented to the Board for adoption, if it elects to recommend and approve a ~~Locally~~ Preferred Alternative ~~(LPA)~~, and a Final EIR (FEIR).

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when the Lead Agency approves a project that would result in significant unavoidable impacts that are disclosed in the FEIR, the agency must state in writing its reasons for supporting the approved action. This "Statement of Overriding Considerations" must be supported by substantial information in the record, which includes the FEIR.

Pursuant to Section 15091(d) of the CEQA Guidelines, the agency must adopt, in conjunction with the findings, a program for reporting or monitoring the changes that it has either required in the project or made a condition of approval to avoid or substantially lessen environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the Mitigation Monitoring and Reporting Plan (MMRP).

Based on information contained in this F~~D~~EIR, the following are the significant and unavoidable impacts of the proposed project.

- Transportation/Traffic (Section 3.2).
  - LRT Alternative 3 (Venice/Sepulveda–Olympic) and LRT Alternative 4 (Venice/Sepulveda–Colorado): LRT Alternatives 3 and 4 result in increased delays on local intersections or reduce the intersection level of service (LOS) to below LOS E or F. Some of the study intersections in the vicinity of the project LRT Alternatives would experience a potentially significant increase in delay without mitigation. Five out of the ~~86~~90 study intersections would be significantly impacted under the LRT Alternatives. Two intersections are expected to remain with significant unavoidable impacts with an LOS F: Sepulveda Boulevard/Palms Boulevard and Girard Avenue/Midvale Avenue/Venice Boulevard. The other three intersections can be mitigated to a less-than-significant impact.
- Aesthetics (Section 3.3)
  - LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 3: Implementation of the proposed project would result in short-term damage or removal of important aesthetic features (that is, removal of vegetation originally placed to enhance the appearance of the constructed environment) along Olympic Boulevard.
  - All LRT Alternatives: Implementation of the proposed project would substantially degrade the existing visual character or quality of the site by permanently altering its surroundings by converting open rail ROW to a rail station and parking area at the Expo/Westwood Station area for LRT Alternative 1 and LRT Alternative 2; and along Venice and Sepulveda Boulevards through the construction of the aerial guideways for LRT Alternative 3 and LRT Alternative 4.
- Construction Air Quality (Chapter 4)
  - The LRT Alternatives would result in peak construction activities that could generate emissions that exceed SCAQMD thresholds. Compliance with

SCAQMD Rule 403 would reduce this impact; however, SCAQMD thresholds would still be exceeded.

- The LRT Alternatives would result in a cumulatively considerable net increase of the criteria pollutant ($NO_X$) during construction activities for which the project region is classified nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors). Compliance with SCAQMD Rule 403 would reduce emissions, but not $NO_X$ emissions to a level below the threshold of impact established by the SCAQMD.
- ~~Construction activities associated with the LRT Alternatives would generate emissions that could result in an exceedance of localized significance thresholds (LST) established by the SCAQMD, and, therefore, could expose sensitive receptors to substantial pollutant concentrations. Implementation of Rule 403 BMPs would reduce localized pollutant levels for all regulated pollutants except $PM_{10}$. $PM_{10}$ levels would still exceed the established thresholds.~~

## 5.2 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Specifically, this section of the CEQA Guidelines states that:

> Use of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts, and particularly, secondary impacts generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with project construction and operation.

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The project would involve a large commitment of nonrenewable resources
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy)
- The primary and secondary impacts would generally commit future generations to similar uses
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project

### 5.2.1 Consumption of Nonrenewable Resources and Responsible Energy Use

**Construction**

As with all development projects, the construction and implementation of the proposed project would entail the one-time irreversible and irretrievable commitment of nonrenewable resources, such as energy (in the form of fossil fuels used for construction equipment) and construction materials (such as lumber, sand and gravel, metals, and water). However, there could be some offset to the use of these nonrenewable resources. Demolition debris would be recycled for

other uses; for example, inert construction debris (e.g., concrete and asphalt) may be crushed and used for road base. The commitment of construction-related energy resources would be irreversible and irretrievable because, once the project has been constructed, those resources cannot be recovered. While project construction would involve a substantial one-time consumption of nonrenewable resources, the long-term operational energy benefits that result from greater transit ridership and reduced single-occupancy vehicles would offset the irreversible and irretrievable loss of nonrenewable resources during construction, as described below.

**Operation**

Operation of the LRT Alternatives would increase Metro's energy consumption by 6.6 to 7.5 percent, depending on the alternative selected. Consumption of nonrenewable resources related to LRT operations include petroleum products (fossil fuels associated with maintenance vehicles) and electricity (associated with operation of the LRVs). However, the reduction in vehicle miles traveled (VMT) for both single-occupancy vehicles and buses associated with the provision of LRT service, and the related energy consumption of fossil fuels, would more than offset the energy consumed in operating the LRT Alternatives. Resources that would be permanently and continually consumed as a result of the project include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources because they would increase the use of transit (which increases energy efficiency) and decrease the dependence on the automobile (which uses fossil fuels). In summary, the proposed project would provide an overall benefit with respect to nonrenewable resources.

### 5.2.2 Commitment to LRT Use

Development of the proposed project would commit land within the proposed right-of-way and at stations, parking lots, and the maintenance facility to transit use. This long-term commitment of land resources is consistent with the policies of the County of Los Angeles and the cities of Culver City, Los Angeles, and Santa Monica to promote LRT uses, including associated improvements, such as transit stations and the maintenance facility. While the project would commit the Expo ROW for LRT uses for future generations, the proposed project is the culmination of a planning process that has been underway for over 30 years and would result in the provision of light-rail service from downtown Los Angeles to Santa Monica.

The commitment of land for the LRT Alternatives is considered appropriate because residents and visitors to the area and region would benefit from the improved quality of transit services, which, in turn, would result in an overall decrease in the irreversible and irretrievable commitment of nonrenewable resources. In addition, these benefits would also consist of improved accessibility and safety, which would also offset the commitment of these resources. Further, much of the required property was purchased, and has been held, by public agencies for the express purpose of providing right-of-way for transportation improvements.

Pursuant to Title 24 and Metro's *Energy and Sustainability Plan*, where feasible, project features would be designed to minimize heat-reflective surfaces, as well as provide landscaping, where appropriate, to reduce heat reflection on adjacent structures. The proposed project would utilize water-conserving plants to the greatest extent feasible in the landscape plan, as well as reclaimed water, where it is available, for irrigation.

### 5.2.3 Potential Environmental Accidents

With respect to aspects of the project that could result in irreversible damage caused by environmental accidents, the proposed project would not involve the use or transport of hazardous or acutely hazardous materials, as discussed in Section 3.9 (Hazards and Hazardous Materials) of this FEIR. The project consists of an LRT system, which would include transit stations, a maintenance facility, and associated landscaping, all of which would primarily use household-type cleaning materials, such as detergents, cleansers, pesticides, and herbicides. These materials would be used in relatively small volumes and are not considered acutely hazardous materials according to the National Institute of Health. Therefore, there is minimal risk of irreversible damage caused by an environmental accident associated with hazardous or acutely hazardous materials.

## 5.3 Growth-Inducing Impacts

CEQA requires the analysis of a project's potential to induce growth. CEQA Guidelines, Section 15126.2(d), require that environmental documents "… discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment …."

In accordance with CEQA Guidelines Section 15126.2(d), a project may foster spatial, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area)
- The project results in the urbanization of land in a remote location (leapfrog development)
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.)

Generally, growth-inducing projects are those that would foster or remove obstacles to population growth or the construction of additional housing. Transportation projects that are located in isolated, undeveloped, or underdeveloped areas, or that provide new accessibility to such areas, may be considered growth inducing. The Expo Phase 2 project would be built within a well-developed urban area, where only in-fill development opportunities remain. The project would be located in an area that is already well served by an existing network of electricity, water, sewer, storm drain, and other infrastructure that accommodates existing and planned growth.

The project would not provide new accessibility but would enhance accessibility by transit, thereby reducing private automobile use. The need for a high-capacity, major transit investment in the Expo Phase 2 community is driven by significant population and employment concentrations, along with continued growth trends in the greater area. The project would accommodate and serve residents and visitors to the project cities and would provide an increased level of public transit service that is consistent with local and regional growth

projections and land use/transportation policies. The project also is consistent with local and regional planning to accommodate anticipated corridor growth by reducing VMT and other impacts attendant on private automobile use. In fact, the proposed project is the culmination of a planning process that has been underway for over 30 years, and it would result in the provision of light-rail service from downtown Los Angeles to Santa Monica. Given that the Exposition transit corridor area is a planned and desired land use as reflected in local and regional plans, it would be compatible with the study area's general land use characteristics and would serve to link activity centers within the area. Notably, the intensification of land uses around transit station areas with mixed uses and higher densities reflects an embracement of “smart growth” principles—that projected growth should be focused or directed towards areas with available infrastructure and supportive of reduced vehicle miles traveled, fewer air emissions, and reduced energy consumption. Under smart growth principles, this growth that is projected to occur anyway is directed through general plan, community plan, and specific plan amendments, and rezonings towards station areas.

The Expo Phase 2 project would support these land use initiatives and help accommodate the travel demand that would result from the shifts in population and employment; the No-Build and TSM Alternatives would not be as effective at serving these land use changes. Regardless, given these trends in local and regional planning, neither the No-Build nor any of the project alternatives would be considered growth inducing. The TSM and LRT Alternatives would be consistent with and help fulfill local and regional efforts to accommodate projected growth and travel demand more efficiently.

The proposed project would not be growth inducing in terms of increased employment to support construction, maintenance, and/or operational functions of the proposed LRT. Development of any LRT Alternative would generate relatively short-term, construction-related employment opportunities. However, the construction phases of any project would require a limited labor force due to the relatively short-term nature of construction employment. Given the ample supply of construction workers in the regional work force, which is the area from which construction workers would be drawn, the proposed project would not be considered growth-inducing from a short-term employment perspective. With respect to non-construction-related employment growth, the proposed project does not anticipate long-term growth associated with an increase in employees to support maintenance and/or operational functions of the proposed LRT. Rather, new positions that could be created with implementation of the project would likely be filled by the local labor force. Management positions, if any, may involve recruitment procedures with a target area that is larger than the local region. This could induce a limited number of newcomers to the area. However, this number is expected to be low, and would not result in any notable growth-inducing impacts.

## 5.4 Cumulative Impacts

This cumulative impact analysis considers construction and operation of the proposed project in conjunction with existing, proposed, and reasonably foreseeable development in the cities of Los Angeles, Santa Monica, and Culver City. As set forth in Section 15130(b) of the CEQA Guidelines, the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. As stated in CEQA, *Public Resources Code* (CRC), Title 14, Section 21083(b), “a project may have a significant effect on

the environment if the possible effects of a project are individually limited but cumulatively considerable."

Section 15355 of the CEQA Guidelines states that:

> "Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable and which compound or increase other environmental impacts:
>
> (a) The individual effects may be changes resulting from a single project or a number of separate projects.
>
> (b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Section 15130(b)(1)(A)–(B) of the CEQA Guidelines sets forth two methods for satisfying the cumulative impact analysis requirement:

- The list of projects approach
- The summary of projections approach

The list of projects approach can be under-inclusive because although it is required to include past, present, and reasonably foreseeable future projects, the reasonably foreseeable future projects are usually defined as those for which a development application has been submitted and/or where the environmental process has begun. The summary of projections approach includes a summary of population, employment, and land use projections contained in an adopted general plan or related planning document. For purposes of this project, a "blended" cumulative impacts analysis has been conducted based on a summary of projections from SCAG's 2008 RTP, Metro's 2009~~8~~ Long Range Transportation Plan, and the Culver City, Los Angeles and Santa Monica General Plans, together with funded and unfunded improvement projects from the 2008 RTP and Metro's 2009 Long ~~-~~Range Transportation Plan. In addition, a list of recently proposed or planned projects was evaluated for potential cumulative effects.

The list of recent projects is included as Table 5.4-1 (List of Recent Projects Included in the Cumulative Assessment). In November 2008, the voters of Los Angeles County passed Measure R to provide additional transportation infrastructure funding. Some of the projects on this list are projected to be funded by Measure R, but are currently shown in the SCAG RTP as unfunded.

**Table 5.4-1 List of Recent Projects Included in the Cumulative Assessment**

| Project/Project Identification Number | Description |
|---|---|
| **SCAG Final RTP 2008** | |
| Wilshire Boulevard Corridor Improvements<br>LA0C8050 | Wilshire Boulevard Corridor Improvements—Selby Avenue to Comstock Avenue—Widen Wilshire Boulevard intersections in Westwood (neighborhood) at key signalized intersections and install raised landscape median. |

**Table 5.4-1 List of Recent Projects Included in the Cumulative Assessment**

| Project/Project Identification Number | Description |
|---|---|
| Sawtelle Boulevard Widening at Venice Boulevard<br>LA0C8053 | Sawtelle Boulevard widening at Venice Boulevard—Widen west side of Sawtelle Boulevard, restripe to provide a north-bound left-turn lane from (northbound) Sawtelle Boulevard to west-bound Venice Boulevard. |
| 20th & Cloverfield Streetscape, Pedestrian and Traffic Improvements<br>LA0D313 | Includes street resurfacing, new curbs, sidewalks, landscaping, crosswalks, bus stop improvements, etc. |
| Widen Bundy Drive<br>LAE2515 | Between Wilshire and Santa Monica Boulevard—Widen from two lanes to four lanes |
| Mid-City Transit Corridor: Wilshire Boulevard from Vermont Avenue to Santa Monica Downtown<br>LA29202W | Mid-City Transit Corridor: Wilshire Boulevard from Vermont Avenue to Santa Monica Downtown—Mid-City Wilshire BRT including division expansion |
| Westside Extension<br>UT101 | Westside Extension—Purple Line from Wilshire/Western to La Cienega (unfunded) |
| Sepulveda Boulevard<br>U1A0796 | Widen Sepulveda Boulevard between Olympic Boulevard and Pico Boulevard to "Major Highway" Standard (strategic/unfunded) |
| Sepulveda Boulevard<br>U1A0799 | Sepulveda Boulevard from Pico Boulevard to National Boulevard—Widen to "Major Highway" Standard and increase number of through lanes from two to three lanes (right-of-way required) (strategic/unfunded) |
| Sepulveda Boulevard<br>U1A0800 | Sepulveda Boulevard from National Boulevard to Venice Boulevard—Widen to "Major Highway" Standard and increase number of through lanes from two to three lanes (right-of-way required) (strategic/unfunded) |
| Green Line<br>U1TR0714 | Extend Green Line from LAX to City of Santa Monica (strategic/unfunded) |
| Overland Bridge Widening<br>LA0B7234 | Between National Boulevard/Westbound I-10 Ramps to National Boulevard/National Place—Widen Overland Avenue Bridge over the I-10 Freeway. |
| **METRO ~~Draft~~ LRTP 200~~9~~8** | |
| Crenshaw Boulevard Corridor | Capital Costs |
| Wilshire Boulevard Bus Rapid Transitway Construction | Capital Costs |
| Metro Subway Westside Extension from La Cienega to City of Santa Monica | Strategic Plan/Unfunded |
| **City of Los Angeles** | |
| 10329 W Palms Boulevard<br>DIR-2006-10428-DB | Density bonus mixed-use development project with 49 units and 9,357 square feet (sf) retail in the C2-1 Zone |

**Table 5.4-1 List of Recent Projects Included in the Cumulative Assessment**

| Project/Project Identification Number | Description |
|---|---|
| 11320 W Exposition Boulevard<br>ENV-2006-2238-MND | 22-unit new residential condo |
| 10001 W Venice Boulevard<br>TT-64788 | 115-unit new residential condo; Total Project Area: 54,319 sf |
| 1901, 1925, 1933 S. Bundy/<br>12333 W. Olympic Boulevard<br>ENV-2006-3125-EAF | Proposed mixed use project |
| 11122 W. Pico Boulevard<br>(Casden)<br>None at this time | Proposing 265,000 sf Retail and 500 residential rentals, no applications at this time |
| Bicycle Facility | From Expo Phase 1 Venice/Robertson Station to Santa Monica City Limits |
| **City of Santa Monica** | |
| 2930 Colorado Avenue<br>DEV 07-005 | 115,000 sf commercial; 280 units of "workforce" (i.e., small units that are more affordable) and affordable (109 affordable) |
| 3025 Olympic Boulevard<br>DR 07-003 | 80,000 sf creative office; 85 units of "workforce" |
| Bicycle Facility | From east Santa Monica City limit to 4th and Colorado |

SOURCE: SCAG Regional Comprehensive Plan, ~~April 2001~~October, 2008, Regional Transportation Plan, 2008; Metro ~~Draft~~ Long Range Transportation Plan, 200~~98~~; City of Los Angeles Planning Department; City of Santa Monica Planning Department.

In addition, the City of Los Angeles is considering changes to Pico Boulevard and Olympic Boulevard that could eventually convert them to a one-way couplet from Downtown Los Angeles to Centinela Avenue. The initial phase of this project would entail modifying the signal timing on the two parallel corridors to provide more green time for eastbound traffic on Pico Boulevard and more green time for westbound traffic on Olympic Boulevard, as well as peak period parking restrictions on Pico Boulevard to gain more travel lanes. The second phase would result in redesigning the streets to have one-way traffic flow on each street.

Due to court challenges from groups opposed to the one-way couplet, the City of Los Angeles will be required to complete a full environmental impact report on the project prior to proceeding with its implementation. In concept, where Pico and Olympic Boulevards are in the vicinity of the project, this is expected to help reduce queuing and/or potential future congestion in the immediate project area and help the overall circulation conditions.

### 5.4.1 Cumulative Impact Analysis

In some cases where a cumulative impact is site specific, such as an analysis of certain geologic impacts, the cumulative context is limited to the project limits. In other cases, such as for hydrology and water quality, the cumulative context includes the watersheds beyond the project limits.

**Transportation/Traffic**

The analysis provided in Section 3.2 (Transportation/Traffic) is based upon both existing and future conditions, with and without the project. The analysis included in Section 5.2.5 (Construction Impacts) below also addresses both project-specific and cumulative impacts.

**Aesthetics**

As noted in Section 3.3 (Aesthetics), implementation of LRT Alternative 1 and LRT Alternative 3 would require the removal or relocation of the coral trees in the median of Olympic Boulevard. The loss of the coral trees would be considered an impact to an aesthetic resource. In addition, implementation of LRT Alternative 1 and LRT Alternative 2 could degrade the existing visual character of the proposed Expo/Westwood Station site, and the proposed guideway under LRT Alternative 3 and LRT Alternative 4 would impact the existing visual quality along Venice and Sepulveda Boulevards.

Impacts to visual quality from proposed or reasonably foreseeable development cannot be directly assessed, as potential impacts would be dependent on specific, detailed project information that is not yet available. However, it is not anticipated that impacts associated with the reasonably foreseeable development and the LRT would compound to result in cumulative changes to the visual character not acceptable by the local jurisdiction and/or its neighborhoods. Such development would be subject to existing zoning and would be considered by local jurisdictions as part of their project approval process to ensure visual compatibility. As such, the cumulative impacts associated with other planned or approved projects are expected to be less than significant.

All of the LRT Alternatives would result in new sources of increased daytime glare and/or nighttime light, which is considered a potential impact. Light and glare from proposed or reasonably foreseeable development and the LRT Alternatives would increase ambient lighting and could result in potential glare impacts. However, compliance with *Metro Design Criteria* and design review would include appropriate measures and conditions of project approval that reduce individual project's light and glare effects to less than cumulatively considerable; therefore, cumulative impacts would be less than significant.

**Air Quality**

The future CO concentrations at the study intersections in 2030 take into account project-specific and cumulative conditions, since the assessment relies on future transportation projections, which reflect the proposed project and reasonably foreseeable background growth and development projects. The AQMP incorporates transportation project assumptions from the RTP and the RTIP developed by SCAG to estimate regional stationary and mobile air emissions. If the related projects are individually consistent with the RTP and the RTIP, then all cumulative impacts would be accounted for in the AQMP. The Expo Phase 2 project, which is included in SCAG's 2008 RTP and the 2008 RTIP and is discussed in Section 3.4 (Air Quality), is determined to have a beneficial air quality effect. Therefore, significant cumulative impacts would not occur.

Future projects could result in long-term future exposure of sensitive receptors to substantial pollutant concentrations. Operation of the LRT Alternatives and associated parking areas and the maintenance facility would not expose sensitive receptors to substantial pollutant concentrations. Pollutant levels would be below the SCAQMD localized significance thresholds

for CO, $NO_2$, $PM_{10}$, and $PM_{2.5}$. CO levels associated with the LRT Alternatives are projected to be lower in 2030 than in 2008 due to improvements in vehicle emission rates predicted by the California ARB. The future CO concentrations at the study intersections in 2030 are based on the projected future traffic volumes from the study intersections contained in the project traffic study, and take into account emissions from the proposed project, future ambient growth, and cumulative projects. As noted in Section 3.4 (Air Quality), operation of the proposed project would not generate emissions that exceed SCAQMD thresholds and would not result in an increase in localized CO concentrations. CO concentrations would not exceed state air quality standards for CO concentrations. In addition, the proposed project is fully conforming to the 2007 AQMP and California's State Implementation Plan (SIP). The proposed project would not result in a cumulatively considerable contribution to this cumulative impact. Therefore, the cumulative impact of the proposed project would be less than significant.

**Global Climate Change**

Global climate change by its nature is a cumulative impact. The amount of greenhouse gas emissions generated by this or any other single project on its own is not sufficient to create global climate change impacts. Rather it is this project's incremental contribution to greenhouse gas emissions when combined with all other anthropogenic sources of greenhouse gas emissions that influences global climate change. The greenhouse gas emissions from an individual project, even a very large development project, would not generate sufficient greenhouse gas emissions to measurably influence global climate change. The analysis provided in Section 3.5 (Global Climate Change) addresses the analysis of both project-specific and cumulative impacts, since the assessment relies on future transportation projections, which take into account the proposed project and reasonably foreseeable background growth and development projects. Operation of the proposed project would indirectly increase greenhouse gas emissions through the generation of electricity required to operate the light-rail vehicles (LRVs).

By contrast, the proposed project would result in increased transit ridership in Los Angeles County and reduced annual VMT associated with single-occupancy automotive traffic, as compared to the baseline conditions without the proposed project. A regional reduction in VMT would be expected to contribute to a corresponding regional reduction in greenhouse gas emissions, which would more than offset the indirect increase in such emissions due to LRV operation. In addition, implementation of the LRT Alternatives would result in improvements in intersection level of service (LOS), contributing to reductions in greenhouse gas emissions by increasing the efficiency of the regional transportation system (refer to Section 3.2 [Transportation/Traffic]). The proposed project would conform to the 2008 RTP ~~2008~~ goals to reduce the amount of VMT in the region and demonstrate the ability for the region to attain California ARB's targets as well as AB 32 and Executive Order S-3-05. Because the proposed project would have an overall reduction in greenhouse gas emissions, it would not contribute to cumulative effects.

**Biological Resources**

As noted in Section 3.6 (Biological Resources), the LRT Alternatives would not result in impacts associated with sensitive habitat, wetlands, fish or wildlife movement, or consistency with plans and policies, including adopted Habitat Conservation Plans. As a result, the proposed project would not contribute to cumulative impacts for these biological resources.

By contrast, cumulative development within the watershed of the Sepulveda Channel would increase the potential for impacts to the Santa Monica Bay through stormwater runoff that potentially contains pollutants and nutrients that could adversely affect water quality. Accordingly, reasonably foreseeable development including the proposed project plus past developments that predate modern water quality regulations would result in cumulatively significant water quality and biological impacts, as they have the potential to substantially reduce the biological value of the Santa Monica Bay. However, implementation of a Stormwater Pollution Prevention Plan (SWPPP) and the use of state stormwater BMPs (during and after construction) would ensure that the LRT Alternatives as well as other development projects would control and manage stormwater runoff quality and reduce individual project impacts to less than cumulatively considerable. Furthermore, the *Metro Design Criteria* requires that, at all stations include sufficient trash containers that are anchored to prevent loss of materials and covered to prevent rainfall comingling. Trash would be regularly removed. These measures would prevent adverse water quality effects associated with these gross pollutants.

Additionally, state and federal regulations and policies governing the protection of, and mitigation for impacts to, state or federally protected wetlands or other jurisdictional areas would reduce individual project impacts to wetlands, waters of the U.S., and riparian habitats to less than cumulatively considerable.

**Cultural Resources**

As noted in Section 3.7 (Cultural Resources), ~~all of the~~ LRT Alternatives 3 and 4 along the Venice/Sepulveda alignment have a potential effect on one historic resource (the Ivy Substation), and, depending on the alignment, the LRT A~~a~~lternative~~s,~~ may affect from one to six potentially historic resources. In addition, LRT Alternative 3 and LRT Alternative 4 would result in a physical take of a portion of an eligible historic architectural resource, modification to the Citizens State Bank building at 10341 Venice Boulevard. Other foreseeable development in the project corridor could likewise result in the loss of historic resources, such that there could be a potentially significant cumulative cultural resource impact. However, with implementation of the identified mitigation measures for the proposed project, there would be no adverse effects to historic resources, and thus, the project's contribution to cumulative impacts would be less than cumulatively considerable.

Also as noted in Section 3.7 (Cultural Resources), implementation of the LRT Alternatives could disturb or destroy unique archaeological resources or sites. Local development that includes excavations in sediments containing archaeological artifacts could result in loss of archaeological resources, which would cumulate with the impact of the proposed project. However, implementation of the identified mitigation measure for the proposed project would reduce the project's effect to less than cumulatively considerable.

As a result, the cumulative impact would be reduced to less than significant.

**Geology, Soils, and Seismicity**

As noted in Section 3.8 (Geology, Soils, and Seismicity), the proposed project would not result in impacts due to seismic risk, soil erosion, landslides or liquefaction. Portions of the proposed project may be located on expansive soil; however, compliance with the *Metro Design Criteria*, including the *California Building Code* (CBC), would address any risk associated with expansive soils; therefore, the proposed project would create no impact. Other projects would have to comply with the CBC and other building regulations to address these geologic, soil, and seismic

risks. Since the proposed project would not result in any of the above-listed geoseismic hazards and other projects would have to comply with the CBC and other existing regulations, there would be no cumulative impacts for geology, soils, and seismic hazards.

**Hazards and Hazardous Materials**

As noted in Section 3.9 (Hazards and Hazardous Materials), the proposed project could expose the public or the environment to hazardous materials during operational activities, and be located on a listed hazardous materials site. Compliance with federal, state, and local hazardous materials and waste laws would ensure that potentially contaminated sites would be remediated to acceptable levels and result in no impact for the intended use. The same regulations would apply to cumulative projects. Therefore, no contribution to cumulative impacts would occur.

Existing, proposed, and reasonably foreseeable development could, during operations, routinely expose the public or the environment to hazardous materials. Operation of future projects would be required to comply with federal, state, and local statutes and regulations applicable to the use of hazardous materials, and would be subject to existing and future programs of enforcement by the appropriate regulatory agencies. Therefore, no cumulative impact associated with operations of future projects and the routine exposure of the public or environment to hazardous materials would occur.

**Hydrology/Water Quality**

Reasonably foreseeable development including the proposed project plus past developments that predate modern water quality regulations would result in a cumulatively significant water quality impact. As noted in Section 3.10 (Hydrology/Water Quality), implementation of the LRT Alternatives could increase the potential amount of pollutants in stormwater runoff that could cause or contribute to a violation of water quality standards. However, project effects are mitigated to less than significant by BMPs and mitigations included in this document. As a result, the project impacts are less than cumulatively considerable.

The Ballona Creek Watershed and Kenter Canyon Watershed have remaining pervious areas that could be developed. Implementation of LRT Alternative 1 and LRT Alternative 2 could alter the existing drainage pattern in a manner that would cause localized flooding, or increase runoff that would contribute to exceedance of the capacity of local stormwater drainage systems. Similarly, future urban development could increase the rate and amount of stormwater runoff entering the area drainage systems that could lead to substantial increases in flood potential. However, development within these watersheds would be subject to current regulations including the Municipal NPDES permit and environmental review process. These mechanisms would reduce the effects of new development from causing or contributing to exacerbated flood conditions. These mechanisms, along with the identified mitigation measures for the proposed project would reduce individual project impacts on flooding from increased runoff to less than cumulatively considerable.

LRT Alternative 1 and LRT Alternative 2 may place structures within a 100-year flood hazard area that could impede or redirect flood flows, or cause water-related hazards such as flooding. These LRT Alternatives and other development within areas defined by FEMA as a Special Flood Hazard Area would be regulated by FEMA, encroachment permits, and the environmental review process. These mechanisms would ensure that cumulative impacts from the proposed project (LRT Alternatives 1 and 2) and other foreseeable development would be less than

cumulatively considerable. Therefore, the cumulative impact on floodplain encroachment and risk would be less than significant.

**Land Use/Planning**

As noted in Section 3.11 (Land Use/Planning), implementation of LRT Alternative 3 and LRT Alternative 4 along Venice and Sepulveda Boulevards would conflict with policies identified in the *Culver City General Plan,* while implementation of LRT Alternative 1 and LRT Alternative 3 along Olympic Boulevard would conflict with the policies of the City of Santa Monica Land Use Circulation Element (LUCE). Other proposed or reasonably foreseeable projects could result in the identification of conflicts related to the specific policies of the cities of Los Angeles, Culver City, and/or Santa Monica. Those projects would be subject to conformance review with each community prior to permitting. Identification of plan or policy conflicts does not necessarily result in physical environmental impacts. In the built-out communities of Los Angeles, Culver City, and Santa Monica, there are few places to develop new uses. Most development is infill development and is evaluated during the development review process for compatibility with existing land uses and for consistency with existing land use plans and policies. SCAG adopted a set of advisory land use policies and strategies for future regional planning efforts and for localities to consider as they accommodate future growth. The proposed project would conform to the RTP 2008 goal of integrating land uses and transportation planning. Development like the LRT Alternatives could encourage higher-intensity uses at transit nodes. Therefore, the project effect would be less than cumulatively considerable.

**Noise and Vibration**

As noted in Section 3.12 (Noise and Vibration), operation of the LRT Alternatives could expose the public to increased noise and vibration levels, and could cause a substantial permanent increase in ambient noise levels in the project vicinity.

With increased distance between receptors and noise sources, the extent of noise exposure is dissipated. Therefore, only noise sources in the immediate vicinity of the LRT corridor would have the potential to combine with the project to cause a cumulative noise impact. The noise measurements taken for the project consider ambient noise from existing uses surrounding the LRT Alternatives. Noise impacts from cumulative development in the project area are largely attributable to the increase in vehicular traffic generated by that development. Since the noise assessment relies on future transportation projections, which reflect the proposed project and reasonably foreseeable background growth and development projects, the analysis in Section 3.12 (Noise and Vibration) covers both project-specific and cumulative impacts. The foreseeable development that contributes to cumulative noise impacts would be required to comply with project-level mitigation and existing noise-reduction policies. Additionally, the identified mitigation measures for the proposed project's noise impacts would reduce the LRT Alternatives' contributions to less than cumulatively considerable. As a result of these mitigation measures and policies, cumulative noise impacts would be reduced to less than significant.

Like noise, vibration dissipates as the distance from the vibration's source increases. Compliance with existing regulations and implementation of mitigation measures would ensure that this vibration impact is reduced below the FTA impact criteria for the LRT Alternatives. A potential long-term source of vibration in the immediate project area under the cumulative scenario would be traffic. However, as discussed in Section 5.6 (Areas of Controversy/Issues to

Be Resolved), traffic-related vibration is generally attenuated by the suspension systems and tires of vehicles. Therefore, no significant cumulative vibration impacts would occur.

**Paleontological Resources**

As noted in Section 3.13 (Paleontological Resources), implementation of the LRT Alternatives could disturb or destroy unique paleontological resources or sites. Local development that includes excavations in sediments containing fossils could result in loss of paleontological resources, which would cumulate with the impact of the proposed project. However, implementation of the identified mitigation measure for the proposed project would reduce the project's effect to less than cumulatively considerable. As a result, cumulative paleontological impacts would be less than significant.

**Parks and Community Facilities**

As noted in Section 3.14 (Parks and Community Facilities), implementation of the LRT Alternatives may disrupt access to some community facilities and lead to some reduction in parking, which is a potential impact. While the proposed LRT Alternatives would change transportation patterns through the study area through direct road reconfigurations and implementation of a transit project, motorists would respond to these changes by selecting other routes and access to community facilities would still be available. The proposed project would conform to the 2008 RTP ~~2008~~ goal allowing the region to have greater park accessibility from future infrastructure investment. Operation of proposed and reasonably foreseeable development at the same time as operation of the proposed LRT Alternatives would not likely result in a disruption to community facilities and services, and thus cumulative impacts to community facilities, including parks, would be less than significant.

**Safety and Security**

As noted in Section 3.15 (Safety and Security), implementation of the proposed project could create the potential for substantial adverse safety conditions, could substantially limit the delivery of community safety services, or could create the potential for increased pedestrian and/or bicycle safety risks. Existing, proposed, and reasonably foreseeable development could increase the potential for cumulative safety and security impacts. However, compliance with Metro standard operating procedures, local and state safety regulations, and 2008 RTP ~~2008~~ policy commitments to transportation safety and security, as well as CPUC requirements, would reduce potential cumulative impacts to less than significant.

**Socioeconomics**

As noted in Section 3.16 (Socioeconomics), implementation of the LRT Alternatives could displace substantial numbers of people and/or existing housing but would not necessitate the construction of replacement housing or create a demand that cannot be accommodated by existing housing stock. It is possible that reasonably foreseeable development, including both public agency and private development projects, could also result in property acquisitions. As a result, there is a potential cumulative impact in terms of displacement.

Public projects, such as the LRT Alternatives, would require relocation assistance and compensation as mandated by federal, state, and/or local law. Thus, the cumulative effect of displacement by public projects would be reduced to less than significant as each project would need to reduce its own impacts to less than cumulatively considerable. In the case of cumulative private development, private projects are not required to provide relocation assistance and

compensation. Instead, private development is dependent upon sales agreements between interested and willing parties (buyers and sellers). Therefore, the potential relocation of business or residential tenants would be agreed upon at the time of sale, and no mitigation would be required.

**Energy Resources**

As noted in Section 3.17 (Energy Resources), the LRT Alternatives would not lead to a wasteful, inefficient, or unnecessary usage of fuel or energy, and would not result in a substantial increase in demand upon existing energy sources such that substantial additional capacity or the development of new energy sources is required.

The LRT Alternatives would augment the existing public transit system, would provide additional public transit mobility options, and would help to offset increased demand for energy from single-occupancy vehicles. While the LRT Alternatives would increase Metro's energy needs by no more than 7.3 percent, on a regional basis, this increase would be offset by reduction of energy consumed by single-passenger vehicles and buses. Energy usage under the LRT Alternatives would not be considered wasteful or inefficient as more people would be moved through the transportation system. In addition, the LRT Alternatives incorporate numerous energy-conserving elements from Metro's *Energy and Sustainability Policy*. Other existing, proposed, and reasonably foreseeable development projects are subject to Title 24 and approval by local jurisdictions, which have the authority to impose energy conservation measures.

Existing, proposed, and reasonably foreseeable development could combine with the proposed LRT Alternatives to result in an increase in demand upon existing energy sources. As a result, the capacity to provide the energy could be approached or exceeded and/or substantial additional capacity, or the development of new energy sources, may be required. However, fuels consumed during operational phases for development projects are widely available in commercial markets. The LRT Alternatives would consume between 40 billion and 44 billion BTU annually, while California's annual transportation-related energy use was 3,199,591 billion BTU in 2004. Therefore, operation of the LRT Alternatives would require a small fraction of the state's current transportation-related energy consumption. Given this and the reduction in single-occupancy vehicle and bus VMT, the contribution of the LRT Alternatives to cumulative energy demand would be less than cumulatively considerable and the cumulative impact would be less than significant.

### 5.4.2 Construction Impacts

**Transportation/Traffic**

As noted in Chapter 4 (Construction Impacts), construction of the LRT Alternatives could result in the closure of one or more lanes of a major traffic-carrying street for an extended period of time, the diversion of traffic through residential areas, and the long-term loss of parking or pedestrian access that is essential for continued operation of business. However, these impacts would only be temporary during the construction period and implementation of the identified mitigation measures would reduce these impacts.

Local jurisdictions could issue conflicting permits associated with other development that could also result in lane closures that could last for one month or more. Other public and private

construction activities may result in extended lane closures, and construction of the LRT Alternatives could contribute to this impact if the lane closures were to occur simultaneously to other projects. However, implementation of the mitigation measures identified in Chapter 4 would serve to reduce impacts associated with closure of lanes due to construction of the LRT Alternatives. Therefore, while other public and private construction activities may result in extended lane closures, with mitigation measures identified in Chapter 4, the cumulative effect of the construction of the LRT Alternatives would be considered less than significant.

Construction activities associated with other development could potentially divert traffic through residential areas. However, as identified in Chapter 4, construction of the LRT Alternatives would include a number of mitigation measures to minimize project-related impacts. Therefore, while other public and private construction activities may result in diversion of traffic into residential streets, with mitigation measures identified in Chapter 4, the effect of construction of the LRT Alternatives on traffic through residential areas would be less than cumulatively considerable.

Although project construction would occur over several years, construction activities would be spread throughout the ultimate alignment. Because construction traffic impacts would be localized, any other development with potential to result in additive effects with regard to traffic would have to be in the immediate vicinity of the portion of the Expo Phase 2 project that is being constructed. Further, construction-related traffic impacts from other development in the project area would be required to comply with project-level mitigation and worksite traffic control plan requirements and would not be expected to exceed applicable traffic impact criteria. Therefore, given the duration of project construction in any one area, the low likelihood of concurrent cumulative development in the immediate vicinity, and requirements to comply with worksite traffic control plans, the contribution of the Expo Phase 2 project to temporary and periodic cumulative traffic impacts would be less than significant.

A number of identified cumulative projects would be located along Venice Boulevard, Sepulveda Boulevard, Colorado Avenue, Olympic Boulevard, and other streets in proximity to the LRT Alternatives that contain businesses. As no information is available to determine whether parking or access restrictions could occur as a result of construction of these projects or whether construction schedules would overlap, this cumulative impact could be significant. However, with implementation of the identified mitigation measures, construction of the LRT Alternatives would not contribute to this impact and the cumulative effect would be considered less than significant.

**Aesthetics**

As noted in Chapter 4 (Construction Impacts), construction of LRT Alternative 1 or LRT Alternative 2 could degrade the existing visual character or quality of a portion of Segment 1 (Expo ROW) (i.e., the Sara Berman Greenway). Compliance with the identified mitigation measure would reduce this impact.

Impacts related to negative impacts on scenic vistas or important aesthetic features from proposed or reasonably foreseeable development cannot be accounted for, because potential impacts would be dependent on specific, detailed project information, which is not available. Those projects would, for the most part, be subject to the approval of the appropriate jurisdiction. Future construction activities may lead to the temporary degradation of these sites through grading and construction staging; these impacts would be temporary and would not

result in long-term degradation of views or visual character. Therefore, cumulative effects to scenic vistas or important aesthetic features would not be assumed to occur, and the cumulative impact would be considered less than significant.

**Air Quality**

During construction, the project would add a cumulatively considerable contribution to a federal or state nonattainment pollutant. Because the Basin is currently in nonattainment for ozone (for which VOC and $NO_X$ are precursors), $PM_{10}$, and $PM_{2.5}$ under federal and state standards, projects could cumulatively exceed an air quality standard or contribute to an existing or projected air quality exceedance. The SCAQMD neither recommends quantified analyses of cumulative construction or operational emissions nor provides separate methodologies or thresholds of significance to be used to assess cumulative construction or operational impacts. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed using the same significance criteria as those for project-specific impacts; that is, individual development projects that generate construction-related or operational emissions that exceed the SCAQMD-recommended daily thresholds for project-specific impacts would contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As noted in Chapter 4 (Construction Impacts), peak construction activities associated with the LRT Alternatives would result in a cumulatively considerable net increase of the criteria pollutant $NO_X$~~, and would cause an exceedance of localized significance thresholds for $PM_{10}$~~. Compliance with SCAQMD Rule 403 and ~~BMPs~~ BACMs would reduce these impacts, but not to a level below the threshold of significance established by the SCAQMD for $NO_X$. The construction of the proposed Project would not exceed any pollutant significance thresholds with the incorporation of the BMP measures included in this analysis. Because the proposed project would exceed SCAQMD thresholds for $NO_X$~~, the pollutants and~~ which is a precursor~~s~~ of ozone for which the Basin is in nonattainment, the proposed project would make cumulatively considerable contributions of $NO_X$~~, these pollutants~~ during construction of the proposed project. As no further feasible mitigation is available, this cumulative impact would be significant and unavoidable, and the project's contribution would be cumulatively considerable.

**Biological Resources**

The geographic context of cumulative impacts to MBTA and *Fish and Game Code* protected species is the 5-mile vicinity around the study area. This area provides an abundance of nesting opportunities within existing landscaping and street trees. In this context, the loss of street trees and landscaping associated with construction of the LRT Alternatives or other development would result in a minor reduction in nesting habitat. While this would require birds to nest elsewhere, street trees and landscaping are common within the vicinity providing an abundance of habitat. Therefore, the cumulative impact would be less than significant.

**Hazards and Hazardous Materials**

As noted in Chapter 4 (Construction Impacts), construction of the LRT Alternatives could create the potential for upset or accident conditions due to release of hazardous materials. However, compliance with federal, state, and local laws and regulations, and implementation of the identified mitigation measures, would reduce potential health risks appropriately.

Existing, proposed, and reasonably foreseeable development could also create the potential for upset or accident conditions involving the release of hazardous materials during construction. Federal, state, and local statutes and regulations applicable to hazardous materials issues during construction would be enforced and implemented for all foreseeable projects. As this regulatory regime is comprehensive, and as future growth, as well as the proposed project would be subject to existing and future programs of enforcement by the appropriate regulatory agencies, no cumulative impact associated with construction-period upset or accident conditions involving the release of hazardous materials would occur.

**Hydrology/Water Quality**

As noted in Chapter 4 (Construction Impacts), construction of the proposed project could increase the potential amount of pollutants in stormwater runoff that could cause or contribute to a violation of water quality standards. Reasonably foreseeable development including the proposed project plus past developments that predate modern water quality regulations would result in cumulatively significant water quality impact.

The cities of Santa Monica, Culver City, and Los Angeles all require compliance with federal, state, and regional regulations concerning the protection of water quality. As such, future development, including construction of the LRT Alternatives, would be subject to the Construction General Permit, Municipal NPDES Permit, Construction Dewatering General Permit, Industrial General Permit, and Discharge of Non-Hazardous Contaminated Soils waste discharge requirements (WDRs). Furthermore, other development would also be subject to the environmental review process. Therefore, construction of the LRT Alternatives would not contribute to cumulatively considerable impacts and there would be a less-than-significant impact.

**Land Use/Planning**

As noted in Chapter 4 (Construction Impacts), construction of the LRT Alternatives would result in temporary access restrictions to established communities; however, implementation of the identified mitigation measure would reduce the impacts.

Although project construction would occur over several years, construction activities would be spread throughout the ultimate alignment. Because construction activities would be localized, any other development with potential to result in additive effects with regard to access restrictions and incompatible land uses would have to be in the immediate vicinity of the portion of the Expo Phase 2 project that is being constructed. Further, construction-related impacts from other development in the project area would be required to comply with project-level mitigation and would include measures to ensure that access to businesses, community services, and adjacent properties is maintained. Therefore, given the duration of project construction in any one area, the low likelihood of concurrent cumulative development in the immediate vicinity, and requirements to ensure that local access is maintained, the contribution of the Expo Phase 2 project to temporary access restrictions would be less than significant.

**Noise and Vibration**

As noted in Chapter 4 (Construction Impacts), construction of the LRT Alternatives could expose the public to increased noise and vibration levels. However, with implementation of the identified mitigation measures, the impacts would be reduced to less than significant.

Although project construction would occur over several years, construction activities would be spread throughout the ultimate alignment. Because construction noise and vibration would be localized, any other development with potential to result in additive effects with regard to noise or vibration would have to be in the immediate vicinity of the portion of the Expo Phase 2 project that is being constructed. Further, construction-related noise and vibration impacts from other development in the project area would be required to comply with project-level mitigation and existing noise-reduction policies and would not be expected to exceed applicable noise impact criteria. Therefore, given the duration of project construction in any one area, the low likelihood of concurrent cumulative development in the immediate vicinity, and requirements to comply with existing noise-reduction policies, the contribution of the Expo Phase 2 project to temporary and periodic cumulative noise impacts would be less than significant.

**Parks and Community Facilities**

As noted in Chapter 4 (Construction Impacts), construction of the LRT Alternatives would result in the temporary loss of access and parking when the community facility abuts the project alignment. However, with implementation of the identified mitigation measures, these impacts would be minimized.

Construction of proposed and reasonably foreseeable development at the same time as construction of the proposed LRT Alternatives could potentially result in temporary disruption to community facilities and services, and the cumulative impact would be potentially significant. Other major projects would be required to submit their own traffic management plans to address the concern.

The proposed LRT Alternatives include mitigation measures that would minimize access constraints and loss of parking associated with construction and commit to coordinating traffic management with other nearby construction projects. While the length of the construction period (4 years) and the length of disruption (approximately 7 or 8 miles) are large, the proposed LRT Alternatives would not represent a substantial construction project at any one location. Given the short construction duration at any given location along the proposed project alignments, the requirement that other major projects have traffic management plans, and the commitment to coordinate with other development, it is reasonable to assume that the proposed LRT Alternatives would not combine with other construction to represent a significant cumulative impact on community facilities. In light of these considerations, the cumulative impact to community facilities would be less than significant.

**Safety and Security**

As noted in Chapter 4 (Construction Impacts), construction of the proposed project could substantially limit the delivery of community safety services, such as police, fire, or emergency services, to locations along the proposed alignments. However, compliance with the identified mitigation measures, standard operating safety procedures, and local and state safety regulations would reduce safety and security impacts such that the project's impacts would be less than cumulatively considerable.

Construction of proposed and reasonably foreseeable development could also result in impacts associated with decreased police and fire response times due to the construction. However, such projects would also be required to comply with standard operating safety procedures, and local and state safety regulations to reduce safety and security impacts. Construction activities associated with other developments would need to coordinate with local jurisdictions and

prepare worksite traffic control plans to ensure adequate emergency services access. Therefore, the cumulative impacts would be considered less than significant.

**Socioeconomics**

As noted in Chapter 4 (Construction Impacts), construction of the proposed project could disrupt businesses for a period of three months or more. However, the identified mitigation measures would minimize these impacts.

Cumulative development that may occur before or during construction of the LRT Alternatives, as well as the potential for overlapping construction schedules, could result in disruption of businesses for a period of three months or more. However, such development would be subject to the approval of local jurisdictions and would be subject to the development of traffic control plans to reduce such impacts. In addition, the proposed project proposes to coordinate with other nearby development to minimize effects on the local traffic and parking conditions. Therefore, the cumulative impacts would be considered less than significant.

## 5.5 Environmentally Superior Alternative

The LRT Alternatives have been identified as environmentally superior to the No-Build and TSM Alternatives. While the No-Build and TSM Alternatives avoid some impacts that occur under the LRT Alternatives, they would not satisfy the project objectives. LRT Alternative 1 offers the greatest opportunity to reduce regional vehicle miles traveled, serve to expand the existing transit system and increase regional connectivity in the Expo study area, Los Angeles County and the six-county Region. LRT Alternative 2 offers the next best reduction of these factors for Los Angeles County and the Expo study area but does not perform as well in the region. LRT Alternatives 3 and 4 do not perform as well as in Los Angeles County and the Expo study area. The projected reduction in vehicle miles traveled would also translate into reductions in air pollutant and greenhouse gas emissions.

Implementation of the LRT Alternatives would result in an overall reduction in total single-passenger vehicle and bus energy consumption within the study area. The LRT Alternatives would result in less energy consumption than the No-Build and TSM Alternatives and, as such, would result in a beneficial energy impact. While the LRT Alternatives would lead to localized traffic impacts and removal of parking spaces, as well as potential noise and vibration impacts, visual quality and potential cultural resource impacts, and property acquisitions, these impacts would largely be mitigated to less than significant.

A comparison of the LRT Alternatives reveals that LRT Alternative 1 and LRT Alternative 2 do not result in any traffic impacts that could not be mitigated. The other two LRT Alternatives would result in impacts to two intersections that could not be mitigated. LRT Alternative 1 would result in substantially fewer property acquisitions including ~~62~~ 68 total acquisitions with residential relocations impacting an estimated 5 residents. LRT Alternative 2 would have ~~83~~ 92 total acquisitions resulting in the relocation of an estimated 3 residents; LRT Alternative 3 would have ~~194~~ 188 total acquisitions including an estimated ~~256~~ 261 resident relocations; and LRT Alternative 4 would have ~~215~~ 212 total acquisitions including an estimated ~~254~~ 259 resident relocations.

LRT Alternative 1 would also result in the least traffic disruption during construction; LRT Alternative 2 would involve construction in the middle of Colorado Avenue, and LRT

Alternative 3 and LRT Alternative 4 would involve construction within the median of Venice and Sepulveda Boulevards. LRT Alternative 1 would result in visual quality impacts in the Expo/Westwood Station area and on Olympic Boulevard due to the elimination of the coral trees within the median. These impacts would be more substantial than for the other alternatives. The impacts to the coral trees would be avoided by implementation of LRT Alternative 2 but this alternative would result in traffic disruption on Colorado Avenue during construction. LRT Alternative 1 and LRT Alternative 2 would also have the least potential to impact cultural resources.

In summary, given the relative impacts associated with the various alternatives, LRT Alternative 1 or LRT Alternative 2 is considered to be the environmentally superior among the LRT Alternatives.

## 5.6 Areas of Controversy/Issues to Be Resolved

This FDEIR addresses environmental issues that are known or were raised by agencies or interested parties during the Notice of Preparation (NOP) public review period, and/or during the Scoping Meetings for the Proposed Project, the DEIR public review period, and on-going outreach efforts during the preparation of the FEIR. All of the NOP comment letters, and the Scoping Meeting Summary Report, are readily available for review at www.buildexpo.org. In addition, the comments received on the DEIR, along with the responses can be found in FEIR Volume II (Comments and Responses). The following were identified as issues to be resolved:

- Selection of a Locally Preferred Alternative, choosing among:
  - LRT Alternative 1: Expo ROW–Olympic
  - LRT Alternative 2: Expo ROW–Colorado (Recommended in FEIR)
  - LRT Alternative 3: Venice/Sepulveda–Olympic
  - LRT Alternative 4: Venice/Sepulveda–Colorado
- Final locations for traction power substations
- On-street replacement parking final amounts and locations and layouts
- Final specific noise and vibration mitigation measures for each required location
- Final traffic detour plans and haul routes for construction
- Sepulveda grade separation design option, if funding available
- Expo/Westwood Station parking final amount and layout
- Maintenance Facility final location and layout
- Colorado Avenue alignment configuration and parking retention
- Colorado/4th Street Station configuration and Colorado Avenue parking retention

In addition to these issues to be resolved, some commenters still question the analysis conducted in the EIR, as well as the outcome relative to the Expo Phase 2 project. This has included the following areas of controversy and disagreement:

- Traffic modeling (e.g., use of regional model, intersection evaluation methodology, etc.)

- Metro Grade Crossing Policy to determine need for grade separations
- Grade separations proposed by community groups
- Safety risks associated with LRT operations, especially near schools

These issues have received exhaustive attention from the Expo Authority, with additional analysis, coordination, and project changes. More information on these areas of disagreement is provided in the Master Responses found in FEIR Volume II (Comments and Responses). The additional analysis conducted in response to these concerns is documented in FEIR Chapter 2 (Project Alternatives), Section 3.2 (Transportation/Traffic), and Section 3.15 (Safety and Security), as well as the respective technical background reports. Further, Chapter 8 (Community Participation and Public Engagement) describes the outreach efforts that were conducted to resolve project issues.

## Expo Phase 2 Project Approval

As a next step, the Expo Authority Board of Directors will be asked to consider and certify the FEIR before deciding whether to approve the Recommended Preferred Alternative for the Expo Phase 2 project—LRT Alternative 2 (Expo ROW–Colorado). Project approval may include recommendations for the design options at the Expo/Westwood Station, Maintenance Facility, etc. However, some of the issues to be resolved (e.g., noise and vibration mitigation, construction detour plans, etc.) would need to be determined in later stages of engineering.

The Expo Authority will distribute comment responses to commenting agencies at least 10 days prior to FEIR certification by the Expo Authority Board. This will be handled with the distribution of the FEIR to all commenting agencies and others that have requested the FEIR.

In addition to the FEIR, other documents are necessary to support a decision and approve a project under CEQA. This includes:

- Findings of Fact—Written findings must be developed for each significant environmental impact identified in the FEIR, along with a brief explanation of the rationale for each finding. Each finding must contain an ultimate conclusion regarding each significant impact, substantial evidence supporting the conclusion, and an explanation of how substantial evidence supports the conclusion (CEQA Guidelines Section 15092).

  Specifically, the Expo Authority must make findings for each significant effect that the project has been changed to avoid or substantially reduce the magnitude of the impact, including mitigation measures. The Expo Authority must ensure that adopted mitigation measures are fully enforceable through permit conditions, agreements, or other measures. If the Expo Authority cannot make these findings, it must make the finding either that changes to the project are within another agency's jurisdiction, and such changes have been or should be adopted or specific economic, social, legal, technical, or other considerations make mitigation measures or alternatives infeasible (CEQA Guidelines Section 15091).

- Mitigation Monitoring and Reporting Program—When the Expo Authority makes findings on significant effects identified in the FEIR, they must also adopt a program for reporting or monitoring mitigation measures that were adopted or made conditions of project approval. The Mitigation Monitoring and Reporting Program must ensure compliance

with mitigation measures and project revisions identified in the FEIR during project implementation.

- Statement of Overriding Considerations—After considering the FEIR and in conjunction with making findings, the Expo Authority Board must not approve the project if it will have a significant effects on the environmental after imposition of feasible mitigation or alternatives, unless the Expo Authority finds that the benefits of the project outweigh the significant unavoidable adverse impacts.
- Notice of Determination—The Expo Authority must file a Notice of Determination after deciding to approve a project for which the FEIR was prepared.

In summary, the FEIR, Draft Final Findings of Fact, Mitigation Monitoring and Reporting Program, Statement of Overriding Considerations, and Notice of Determination will be brought forth to the Expo Authority Board of Directors in order to approve a project under CEQA. If approved, the Preferred Alternative (LRT Alternative 2 [Expo ROW–Colorado]) can advance in the overall project development process, with more detailed design, engineering, and on-going community outreach efforts.