

**LOS ANGELES UNION STATION
FORECOURT AND ESPLANADE IMPROVEMENTS PROJECT**

FINDINGS OF FACT / STATEMENT OF OVERRIDING CONSIDERATIONS

STATE CLEARINGHOUSE NUMBER 2016121064

PREPARED FOR:

**LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY
ONE GATEWAY PLAZA
MAIL STOP 99-23-4
LOS ANGELES, CA 90012**

PREPARED BY:

**SAPPHOS ENVIRONMENTAL, INC.
430 NORTH HALSTEAD STREET
PASADENA, CALIFORNIA 91107**

JANUARY 16, 2018



TABLE OF CONTENTS

SECTION	PAGE
I.0 INTRODUCTION	I-1
I.1 Certification	I -1
I.2 Project Location	I -1
I.3 Project Goals and Objectives	I -2
I.4 Project Elements	I -3
I.4.1 Alameda Esplanade.....	I -4
I.4.2 Los Angeles Crossing.....	I -4
I.4.3 Arcadia Street Improvements.....	I -4
I.4.4 Forecourt Improvements.....	I -4
I.4.5 Circulation.....	I -4
I.4.6 Landscaping	I -4
I.4.7 Stormwater Runoff Management.....	I -5
I.5 EIR Process	I -5
I.6 General Findings	I -6
I.6.1 Environmental Impact Report.....	I -6
I.6.2 Alternatives.....	I -6
II. POTENTIAL ENVIRONMENTAL EFFECTS THAT ARE LESS THAN SIGNIFICANT.....	II-1
II.1 Aesthetics.....	II-1
II.2 Agriculture and Forestry Resources.....	II-5
II.3 Air Quality	II-8
II.4 Biological Resources	II-14
II.5 Energy	II-17
II.6 Geology and Soils.....	II-20
II.7 Greenhouse Gas Emissions.....	II-25
II.8 Hazards and Hazardous Materials	II-26
II.9 Hydrology and Water Quality	II-29
II.10 Land Use and Planning.....	II-36
II.11 Mineral Resources	II-39
II.12 Noise	II-40
II.13 Population and Housing.....	II-45
II.14 Public Services.....	II-47
II.15 Recreation.....	II-51
II.16 Transportation and Traffic	II-53
II.17 Utilities and Service Systems	II-58
III. POTENTIAL ENVIRONMENTAL EFFECTS THAT CAN BE MITIGATED TO A LEVEL OF INSIGNIFICANCE	III-1
III.1 Biological Resources	III-1
III.2 Cultural Resources	III-2
III.3 Hazards and Hazardous Materials	III-8

IV.	SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS THAT CANNOT BE MITIGATED TO BELOW THE LEVEL OF SIGNIFICANCE	IV-1
IV.1	Transportation and Traffic	IV-1
V.	FINDINGS REGARDING ALTERNATIVES	V-1
V.1	EIR Proposed Project.....	V-7
V.2	Alternative 1: No Project Alternative.....	V-8
V.3	Alternative 2: Full Closure of Los Angeles Street Alternative	V-9
VI.	FINDINGS REGARDING MITIGATION MONITORING PROGRAM.....	VI-1
VII.	FINDINGS REGARDING LOCATION AND CUSTODIAN OF DOCUMENTS	VII-1
VIII.	CERTIFICATION REGARDING INDEPENDENT JUDGMENT.....	VIII-1
IX.	STATEMENT OF OVERRIDING CONSIDERATIONS	IX-1
IX.1	Unavoidable Adverse Environmental Impacts.....	IX-2
IX.1.1	Transportation and Traffic	IX-3
IX.2	Overriding Considerations	IX-5
IX.2.1	Social and Community Relevance	IX-6
IX.2.2	Economic Potential	IX-7
IX.2.3	Sustainable Communities	IX-8
IX.2.4	Public Health Needs	IX-9
X.	SECTION 15091 FINDINGS.....	X-1

TABLE		PAGE
V-1	Ability of Project and Alternatives to Attain Project Objective	V-2
V-2	Comparative Analysis of Impacts for Project and Alternatives	V-4

I.1 CERTIFICATION

Findings of Fact and Statement of Overriding Considerations Regarding the Final Environmental Impact Report for the Los Angeles Union Station Forecourt and Esplanade Improvements Project (State Clearinghouse Number 2016121064)

The Los Angeles County Metropolitan Transportation Authority (Metro) hereby certifies the Final Environmental Impact Report (EIR) for the Los Angeles Union Station Forecourt and Esplanade Improvements Project (project), located adjacent to and within Los Angeles Union Station located at 800 North Alameda Street, City of Los Angeles, California 90012, State Clearinghouse Number 2016121064. The EIR consists of Volume I: Draft EIR, dated August 11, 2017; Volume II: Technical Appendices to the Draft EIR, dated August 11, 2017; and Volume III: Final EIR, dated January 14, 2018. The EIR has been completed in compliance with the California Environmental Quality Act (CEQA); the State CEQA Guidelines; the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS); and all applicable federal, state, and local statutes and regulations that govern the management of environmental resources. The Metro Board of Directors has received, reviewed, and considered the information contained in the Final EIR; all hearings; submissions of testimony from officials representing the City of Los Angeles; as well as from other agencies, organizations, and private individuals with a particular vested interest in the project.

Having received, reviewed, and considered the foregoing information, as well as any and all other information in the record, the Metro Board of Directors hereby makes findings pursuant to and in accordance with Section 21081 of the Public Resources Code as presented in the Findings of Fact and Statement of Overriding Considerations.

I.2 PROJECT LOCATION

The project is located on approximately 6.7 acres in the City of Los Angeles, in the northern portion of the downtown area. The proposed project is located adjacent to and within Los Angeles Union Station (LAUS), at 800 North Alameda Street, City of Los Angeles, California 90012, in the U.S. Geological Survey Los Angeles 7.5-minute topographic quadrangle. The LAUS property is generally bounded by Highway 101 to the south, Alameda Street to the west, Cesar E. Chavez Avenue to the north, and Vignes Street to the east. However, the project site is generally bounded by El Pueblo crosswalk on Los Angeles Street to the west, Cesar E. Chavez Avenue to the north, LAUS to the east, and Arcadia Street to the south. Specific project elements are located on Alameda Street from Arcadia Street in the south to Cesar E. Chavez Avenue in the north, Arcadia Street from Alameda Street to Spring Street, Los Angeles Street from El Pueblo de Los Angeles to LAUS, and the Union Station Forecourt area. Adjacent to the project to the west are the Chinese American Museum at 425 North Los Angeles Street, El Pueblo de Los Angeles State Historic Park at 125 Paseo De La Plaza, and the Avila Adobe Museum at 10 Olvera Street.

I.3 PROJECT GOAL AND OBJECTIVES

Metro is committed to improving passenger safety, improving connections, and accommodating existing and future destination and through-transit demands, including those who desire to utilize alternate forms of transit, rather than automobiles. Metro anticipates increased visitors and transit riders utilizing LAUS as the population grows. Most fundamentally, the project also supports local, regional, and state policies with regard to encouraging multi-modal travel. The need for the project is driven by safety and the need to better serve individuals who travel to LAUS to reach local neighborhoods and business, as well as those who travel to LAUS to make a connection to another mode of travel. Alameda Street, within the project boundaries, was identified in the City of Los Angeles Vision Zero, High Injury Network, a network of streets with higher rates of severe and fatal collisions. Additionally, the goal of the proposed project is to enhance connectivity to LAUS by creating a safer, more welcoming experience to transit riders and visitors to and from surrounding historic and culturally significant communities.

Metro identified seven primary requisite objectives for the project:

- Protect and enhance LAUS as a national historic resource by advancing clear sight lines and view sheds to the station.¹
- Prioritize connectivity, convenience, and safety for the most vulnerable users (pedestrians, bicyclists, transit patrons and community stakeholders) to safely navigate to and from the project site.^{2,3}
- Advance desirable and accessible public space at the LAUS forecourt that creates a visually porous and permeable connection between Union Station and the surrounding historic and cultural communities.⁴
- Facilitate alternatives to driving by providing infrastructure that enables more walking and bicycling.⁵
- Enhance the safety and quality of pedestrian and bicycle connections between the station and El Pueblo Historic Monument, Father Serra Park, Olvera Street, and nearby business and neighborhoods.^{6,7}

¹ National Park Service. 1980. *National Register of Historic Places Inventory Nomination Form*. Available at: <https://npgallery.nps.gov/GetAsset?assetID=c72efa93-90ca-40ba-9ca6-ae3d3515cf37>

² City of Los Angeles Department of City Planning. 2016. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Accessed August 2, 2017.

³ Los Angeles County Metropolitan Transportation Authority. 2015. *Connect US Action Plan*. Available at: https://media.metro.net/projects_studies/union_station/images/LAUSMP_Action_Plan_Final_100515.pdf

⁴ County of Los Angeles Department of Public Health. November 2014. *The Plan for a Healthy Los Angeles*. Available at: http://publichealth.lacounty.gov/place/docs/FINAL_CTG%20HIGHLIGHTS%20Plan%20for%20Healthy%20LA_Nov%202014.pdf

⁵ Los Angeles County Metropolitan Transportation Authority. June 2012. *Climate Action and Adaptation Plan*. Prepared by ICF International. Available at: http://media.metro.net/projects_studies/sustainability/images/Climate_Action_Plan.pdf

⁶ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagtrpccs.net/Documents/2016/final/f2016RTPSCS.pdf>

⁷ City of Los Angeles. Accessed 8 July 2017. Vision Zero. Los Angeles 2015-2025. Available at: <http://visionzero.lacity.org/map/>

- Advance sustainability by providing for reduced consumptive water use in a cost-effective manner⁸ and improving multi-modal facilities that encourage active transportation and reduction in vehicle miles traveled.⁹
- Advance comprehensive planning for LAUS that leverages it as the major regional transportation hub, a destination, and one of the city's foremost landmarks.¹⁰

I.4 PROJECT ELEMENTS

Metro evaluated a proposed project, no-project (Alternative 1), and two action alternatives (Alternative 2 and 3). Metro has selected Alternative 3 for approval.

The project has the potential to immediately improve connectivity to the station and signify an immediate, positive change in perception of the station. Circulation and streetscape improvements to Alameda Street will further enhance the station's doorstep, easing traffic and pedestrian conflicts and offering an aesthetically pleasing journey to the station's front door.

The project will focus on perimeter improvements on the west side of Los Angeles Union Station to improve pedestrian safety, accessibility, and connectivity. It will consist of four general project components: the Alameda Esplanade Improvements, the Forecourt Improvements, the partial closure of Los Angeles Street, and the Arcadia Street El Pueblo tour bus parking. Improvements include:

I.4.1 Alameda Esplanade

Consistent with the Connect US Action Plan (formerly known as the Linkages Plan) and the Union Station Master Plan, Alameda Street is reconceived as a verdant, tree-lined, multi-use esplanade with wide walkways that support pedestrian and bike circulation to the station and along its frontage.

The new esplanade will run along Alameda Street (between Cesar E. Chavez Avenue and Arcadia) and will include narrowing the roadway and reallocating roadway area for the expanded pedestrian and bicyclist multi-use esplanade on the eastside and widened sidewalks on the west. The project would change three travel lanes in each direction to two lanes of travel with a left turn center lane/median and curb side drop-off on the east side of Alameda Street.

I.4.2 Los Angeles Crossing

Reconfiguring the entrance from LAUS to the El Pueblo de Los Angeles State Historic Park by creating a new expanded, raised pedestrian crossing that leads into a new pedestrian plaza that includes a two-way off-street bicycle path through the expanded El Pueblo plaza area near the west side of Los Angeles

⁸ Los Angeles County Metropolitan Transportation Authority. June 2010. *Water Action Plan*. Prepared by ICF International and Brezak & Associates Planning. Available at: http://media.metro.net/projects_studies/sustainability/images/Water_Plan2010_0825.pdf.

⁹ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

¹⁰ City of Los Angeles Department of City Planning. 2016. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Policy 3.6, p. 88. Accessed August 2, 2017.

Street. The project provides additional pedestrian and bicycle connectivity through the partial closure of Los Angeles Street and closure of the northern LAUS driveway on Alameda Street.

I.4.3 Arcadia Street Improvements

The existing northernmost travel lane on Arcadia Street westbound between Alameda Street and Spring Street will be repurposed as a tourist bus parking zone designated for El Pueblo.

I.4.4 Forecourt Improvements

The forecourt improvements include removing the existing 60-space short-term parking northwest of the entrance to LAUS (approximately 60 spaces) to create a dynamic new civic plaza with an outdoor seating area that encourages pedestrian, bike, and transit use.

The forecourt also includes sustainability components and a seating area. Additionally, an approximately 10-foot-tall, 300-square-foot (20-foot by 15-foot) small transit-serving building will be constructed in the northern end of the forecourt. Possible cladding materials include glazed or metal panel curtain wall systems, architectural pre-cast concrete, and terracotta or similar materials that conform to the Secretary of Interior Standards and Guidelines for Historic Properties. The building will be sheltered by an approximately 15-foot-high, 80-foot by 30-foot translucent shade structure. The building and shade element will provide amenities for pedestrians using the forecourt area.

I.4.5 Circulation

As a means to encourage transit ridership and create links to adjacent neighborhoods and the larger urban network of civic spaces, the project will improve the pedestrian, cycling, and vehicular environment. This will include increasing site visibility, incorporating a multi-use bike path along Alameda Street, adding bike parking, increasing pedestrian crossings, and shifting vehicular drop-off/pick-up areas along Alameda Street.

Alternative 3

Alternative 3, the Restricted Left Hand Turns from Los Angeles alternative, would include many of the elements described in the project description but would not allow left hand turns onto Alameda Street from Los Angeles Street. This would mean that only right-hand turns (southbound) would be allowed onto Alameda Street, as well as through movements into Union Station from Los Angeles Street. This alternative would change traffic patterns because the eastbound left movement from eastbound Los Angeles Street to northbound Alameda Street would be prohibited. On Arcadia Street, the tour bus parking lane would be provided during off-peak hours only, with the lane being used by through-traffic during peak hours. This alternative keeps all other project improvements as described in the project description.

I.4.6 Landscaping

The project will create improved public spaces that will be framed by double row of sycamore or similar trees along Alameda in key areas to the west and a linear alignment of olive or similar trees planted along the reconfigured driveway parallel to the historic station to the east. Trees and landscape features

planted in the public right of way will adhere to requirements of the City of Los Angeles Bureau of Street Services.

Relating back to the overall Union Station Master Plan Open Space and Landscape Concept, the ecological conditions along the western edge of the project, including the Alameda Esplanade, will be supported by the planting of sycamore or similar trees. The forecourt will include bioswales that will be designed to receive, convey, treat, detain and release/infiltrate stormwater. To achieve the sustainability goals of the project, the swale may incorporate purple pipes for recycled water usage and drought tolerant landscaping.

I.4.7 Stormwater Runoff Management

In an effort to provide sustainable site systems, the drainage of the forecourt will support stormwater capture and reuse, increasing climate comfort while supporting on-site landscape and urban ecology. For sustainability, the project aims to have the majority of the ground surfaces as decomposed granite and other porous paving materials, including volcanic porphyry pavers and porous concrete, or other comparable materials, to promote a porous ground plane and enhance pedestrian circulation.

I.5 EIR PROCESS

Metro prepared an EIR for the project in accordance with CEQA; the State CEQA Guidelines; and all applicable federal, state, and local statutes and regulations that govern the management of environmental resources.

Metro has taken steps to encourage the public to participate in the environmental process for the project. These steps included, but were not limited to, inviting the public to community workshops prior to and during the preparation of the EIR. On December 22, 2016, Metro circulated a Notice of Preparation (NOP) for a Draft EIR for the project to the State Clearinghouse and to various federal, state, regional, and local government agencies. The public scoping period opens when the SCH receives the NOP. The SCH subsequently distributed the NOP to responsible and trustee agencies, including 11 state agencies.

During the scoping period, Metro held one public Scoping Meeting on January 26, 2017, at the historic Ticketing Counter at Los Angeles Union Station, 800 Alameda Street, Los Angeles, California 90012, from 6:00 to 8:00 p.m. Notices announcing the Scoping Meeting were published in English, Spanish, and Mandarin. The scoping meeting notice was published in local newspapers (*Los Angeles Daily News*, *Downtown News*, *Eastside Sun*, *La Opinion*, *Chinese Daily/World Journal*, *Rafu Shimpo*), posted on the Metro website (<https://www.metro.net/projects/la-union-station-forecourt-and-esplande/>); emailed twice to everyone registered on the Los Angeles Union Station Master Plan webpage; mailed to property owners within 500 feet of Union Station, and presented to local elected officials and stakeholder groups that expressed an interest in Union Station and Metro activities. The scoping period concluded on January 31, 2017.

The EIR was prepared to inform public agency decision makers and the general public about the project and its significant environmental effects, to suggest possible ways of minimizing those significant effects, and to describe a reasonable range of alternatives that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The

Draft EIR was completed and forwarded to the State Office of Planning and Research (OPR) on August 11, 2017, for a 45-day comment period.

A Notice of Completion (NOC) and Notice of Availability (NOA) were posted at both OPR and the Los Angeles County Clerk's Office on August 11, 2017. The NOC and NOA for the EIR were mailed directly to property owners within 500 feet of the project area via U.S. Postal Service certified mail service and distributed to additional interested parties via an email blast and in the abovementioned local newspapers. An announcement of the release of the Draft EIR was distributed via email notification, flyer distribution, and social media. Metro staff published articles in *The Source* and *El Pasajero* blogs. Copies of the Draft EIR were made public at the Los Angeles Main Library, 630 West 5th Street, Los Angeles, California 90071; the Chinatown Branch Library, 639 N. Hill Street, Los Angeles, California 90012; and on Metro's project website: <https://www.metro.net/about/union-station/la-union-station-forecourt-and-esplanade/>. Metro held 22 briefings and meetings took place to update elected officials, community members, and other stakeholders about the Draft EIR and public workshop. A total of 285 people were briefed at all the meetings.

The Final EIR was prepared based on the Draft EIR, comments provided in response to circulation of the Draft EIR for public review, and clarifications and revisions resulting from public review of the Draft EIR. A total of 36 comment letters were received by Metro during the comment period, and six commenters spoke during the public meeting. Metro received an additional three comment letters regarding logistics for the public meeting that were answered directly and were not included in the Final EIR. Upon completion of the evaluation, the Final EIR was prepared and provided to the Metro Board of Directors for certification of compliance with CEQA and for review and consideration as part of the decision-making process for the project.

I.6 GENERAL FINDINGS

Metro has evaluated all environmental impact areas recommended by CEQA and the State CEQA Guidelines during the environmental evaluation of the project.

I.6.1 Environmental Impact Report

The EIR determined the project is not expected to result in significant impacts to 14 environmental impact areas: aesthetics, agriculture and forestry resources, air quality, greenhouse gas emissions, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, and utilities and service systems.

Impacts related to biological resources, cultural resources including tribal cultural resources, and hazards and hazardous materials can be mitigated to below the level of significance.

Impacts to transportation and traffic will remain significant following the implementation of mitigation measures.

I.6.2 Alternatives

Metro has selected Alternative 3, Restricted Left Hand Turns from Los Angeles Street (aka Modified Partial Closure). Alternatives were identified that met most of the objectives of the project and reduced significant effects of the project. In addition to the proposed project, the EIR evaluated the no-project

alternative (Alternative 1) required by CEQA, and two action alternatives (Alternative 2, Full Closure of Los Angeles Street Alternative, and Alternative 3). Alternative 1, the no-project alternative, was determined to be the environmentally superior alternative. Following Alternative 1, Alternative 2 was determined to be the environmentally superior alternative. Alternative 2 is expected to significantly impact 9 intersections, compared with 17 for the project, while Alternative 3 is expected to impact 11 intersections. However, Alternative 2 has more AM peak hour significant impacts compared with Alternative 3, but fewer PM peak hour significant impacts compared with Alternative 3, so each alternative has benefits over the other during either the AM or PM peak.

In accordance with Section 21081.6 (a) (1) of CEQA, Metro has prepared a mitigation monitoring and reporting program for those measures required to mitigate or avoid significant effects on the environment.

In accordance with Section 21081.6 (a) (2) of CEQA, Metro has specified the location and custodian of the documents and other materials that constitute the record of decision used in the decision-making process for the project.

In accordance with Section 21082.1 (c) (1), Metro, through its governing Board of Directors, has independently reviewed and analyzed the information contained in the reports and environmental documents required by CEQA; has circulated draft documents, which reflect its independent judgment; and finds that the Final EIR reflects the independent judgment of Metro.

Metro has prepared a Statement of Overriding Considerations for the transportation impacts that cannot be reduced to below the level of significance.

This report constitutes the required findings and statement pursuant to Sections 15091 and 15093 of the State CEQA Guidelines.

SECTION II

**FINDINGS REGARDING POTENTIAL ENVIRONMENTAL
EFFECTS THAT ARE LESS THAN SIGNIFICANT**

The analysis undertaken in support of the Environmental Impact Report (EIR) for the Los Angeles County Metropolitan Transportation Authority's (Metro's) Los Angeles Union Station Forecourt and Esplanade Improvements Project (project) determined that the impacts of the project were determined to have no impacts or less than significant impacts in relation to 82 thresholds of significance in 17 environmental resource categories related to the California Environmental Quality Act (CEQA):

1. Aesthetics (four of four impact areas)
2. Agriculture and Forestry Resources (five of five impact areas)
3. Air Quality (five of five impact areas)
4. Biological Resources (five of six impact areas)
5. Energy (three of three impact areas)
6. Geology and Soils (eight of eight impact areas)
7. Greenhouse Gas Emissions (two of two impact areas)
8. Hazards and Hazardous Materials (six of eight impact areas)
9. Hydrology and Water Quality (ten of ten impact areas)
10. Land Use and Planning (three of three impact areas)
11. Mineral Resources (two of two impact areas)
12. Noise (six of six impact areas)
13. Population and Housing (three of three impact areas)
14. Public Services (five of five impact areas)
15. Recreation (two of two impact areas)
16. Transportation and Traffic (six of seven impact areas¹)
17. Utilities and Service Systems (seven of seven impact areas)

II.1 AESTHETICS

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts in regard to having a substantial adverse effect on a scenic vista. No mitigation measures are required.

¹ The EIR analyzed transportation and traffic under seven criteria, rather than the six identified in the State CEQA Guidelines.

Rationale:

The project will result in less than significant impacts in regard to having a substantial adverse effect on a scenic vista. The project site is not visible from state-designated or county-designated scenic vista points due to distance, an intended directional vista toward the north, and intervening topography. The installation of new and replacement street trees along Alameda Street and other Los Angeles Union Station (LAUS) forecourt and esplanade improvements, including a small transit-serving building, will not be visible from these distant scenic vistas.

The project will not adversely affect the viewshed of LAUS (a unique urban or historic feature). Los Angeles Union Station Passenger Terminal and Grounds is located within the project site; the installation of additional trees along the east sidewalk of Alameda Street where there are no existing street trees will affect public access to views of unique urban or historic features from park lands and public rights-of-way, as sycamore trees (or similar species) can reach 70 to 100 feet in height. Additionally, the small transit-serving building and associated 15-foot-tall translucent shade structure will be located at the northern end of the Forecourt and will be designed with complimentary materials to the historic passenger terminal, and will not detract from the primary entrance of LAUS, which is the primary focal point of the western façade of this building. However, the sycamores (or similar species) will be installed outside the major axis between El Pueblo at Los Angeles Plaza Park and the main entrance and 135-foot-high clock tower of the historic LAUS passenger terminal, the viewshed of which will be maintained by retaining the existing historic trees on the LAUS site. Due to the approximately 160-foot distance between the shade trees along Alameda Street and the western façade of the LAUS terminal building, the clock tower and at least a portion of the LAUS terminal building will still be visible from the observation deck of the historic Los Angeles City Hall building (see Photo 1 in Figure 3.1.2-3). The public view of the 80-foot-high United States Post Office – Terminal Annex will not be affected by the project because it is already not visible from the portion of Alameda Street within the project site due to the presence of the approximately 50-foot-high Mozaic Apartment complex in the foreground. The raised approximately 50-foot-high Plaza Substation building within Los Angeles Plaza Park (near the project site) will be less visible from Alameda Street than it is currently visible, but as the building is currently well hidden behind a large ficus tree, impacts from the project on this view will be less than significant (see Figures 3.1.2-1 and 3.1.2-3, Photo 28). The bicycle racks and storage facility and the small transit-serving building within the North Forecourt will be located near the existing Mozaic Apartments complex, smaller than the new trees that will surround the forecourt, and not affect vistas of unique urban or historic features. As shown in Figure 3.1.2-3, the project site is located on the opposite side of mature trees at El Pueblo from Plaza Church, First Cemetery of Los Angeles, and U.S. Courthouse and Post Office; the project will not affect views to or from these historic features (Photos 3, 39, 40, and 41).

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**Impact:**

No Impact

Finding:

The project will result in no impacts in regard to substantially damaging scenic resources within a state scenic highway. No mitigation measures are required.

Rationale:

The project will result in no impacts in regard to substantially damaging scenic resources within a state scenic highway. The project will not be visible from any eligible or officially designated state scenic highways due to distance, intervening topography, and the built environment, as the nearest designation (State Route 110) is located 1.3 mile away. The general project area, inclusive of the 498-foot-tall MTA Gateway Building near the project site, cannot be viewed from officially designated or eligible state scenic highways, historic parkways, or county scenic highways, due to distance, intervening topography, and the built environment. The installation of new and replacement street trees along Alameda Street and other LAUS forecourt and esplanade improvements, including a small transit-serving building, will not be visible from these distant scenic highways.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?**Impact:**

No Impact

Finding:

The project will result in no impacts in regard to substantially degrading the existing visual character or quality of the site and its surroundings. No mitigation measures are required.

Rationale:

The project will result in no impact in regard to substantially degrading the existing visual character or quality of the site and its surroundings. The project will replace an existing parking lot with a forecourt, small transit-serving building, shade structure, and shade trees and include the installation of street trees, which will benefit the existing visual character or quality of the site and its surroundings. The project will involve the removal of mature trees within the LAUS site, along Alameda Street, and the median within Los Angeles Street. Approximately 38 trees will be removed as a result of the project. However, approximately 84 trees will be installed as part of the project, for a net increase of approximately 46 trees in the project site. The forecourt and esplanade improvements will enhance the visual character or quality of the project area.

Landscaping. The replacement of four ornamental trees (unique species to LAUS site) within the center of an existing parking lot with a row of six shade trees and a bioswale along the eastern edge of the new forecourt, in combination with the replacement of the seven existing southern magnolia trees on Metro's property near La Petite Academy/First 5 LA with nine new shade trees and a bioswale using the same plant palette will unify the overall visual character and enhance the visual quality of the LAUS site. The installation of two rows of six sycamore trees (or similar) flanking the new Alameda Esplanade multi-use path with enhanced paving on the eastern sidewalk of Alameda Street and framing the western edge of the new forecourt will further enhance the landscaping grid pattern within the vicinity of the new forecourt. Further, installation of new open canopied street trees will be consistent with City General Plan Policies 5.3.1(a) and 5.8-2(c). The project will include the installation of approximately 69 new sycamore trees (or similar) along the Alameda Street right of way (including the replacement of approximately 15 existing alternating tree species) that will create a unified street tree pattern where

street trees do not currently provide adequate shade for pedestrians. The removal of the existing palms within the median of Los Angeles Street will reduce the visual connectivity between the palms at the LAUS site and El Pueblo; however, impacts will be less than significant due to the contrast in palm tree species, form and height between the trees at the LAUS site and Los Angeles Street, and the hardscape enhancements which will emphasize the visual connectivity between the two sites.

Hardscape. The project will not affect the historic facades within the project site. The enhanced paving and widening of the northern portion of the LAUS site entrance, which will replace a concrete path and asphalt paved driveway with paving material that conforms to the Secretary of Interior Standards. The partial closure of Los Angeles Street at Alameda/El Pueblo for expansion of the sidewalk at Placita de Dolores will increase the visual connectivity between LAUS and Los Angeles Plaza Park, and the contrasting pavers are in conformance with the Secretary of Interior Standards and also will demarcate the location of historic Zanja Madre will enhance the visual quality. The bicycle racks and bikeshare facility and the pavilion within the North Forecourt will be located near the existing Mozaic Apartments complex, smaller than the new trees that will surround the forecourt, and contribute positively to the overall visual character.

Buildings. The 10-foot-tall small transit-serving building and associated 15-foot-tall shade structure will be located at the northern end of the Forecourt and will be designed with complimentary materials to the historic passenger terminal, and will not detract from the primary entrance of LAUS, which is the primary focal point of the western façade of this building. Both structures will be designed consistent with the *Secretary of the Interior's Standards*, such that the massing, the finishes, and the building materials are complimentary, but distinct from the façade of the historic LAUS. The 10-foot-tall building will have a façade which responds to the aesthetic of adjacent buildings (i.e., Mozaic Apartments and the historic Union Station terminal). The 15-foot-tall shade structure will have a translucent shade-providing material to avoid blocking any views.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact:

No Impact

Finding:

The project will result in no impacts in regard to creating a new source of substantial light or glare which will adversely affect day or nighttime views in the area. No mitigation measures are required.

Rationale:

The project will result in no impacts in regard to creation of a new source of substantial light or glare which will adversely affect day or nighttime views in the area. The project includes the installation of new pedestrian lights, as well as a combination of adjustments to existing traffic control signal poles, and where needed, the addition of new traffic signal poles for the reconfiguration of the Alameda Street and Los Angeles Street intersection, which contains existing vehicle-scale street lights and traffic control signal pole lights. The forecourt will include new lighting that will be comparable to existing uplighting along the pedestrian paths, historic entry plaza, and lighting on the LAUS building, as well as a water

feature that will have the potential to increase glare comparable to the existing asphalt parking lot when its surface is wet after a rain event. Installation of new lighting within the forecourt, including a small transit-serving building, and pedestrian-scale street lights will be consistent with City General Plan Policies 5.2.2 and 5.3.1(a). The enhanced paving will replace existing smooth asphalt and concrete hardscape surfaces with a textured surface that will reduce the existing glare levels in these portions of project site. Additionally, the next increase of 46 trees will provide shade, which will result in an overall reduction of nighttime light levels and sources of glare. Installation of new open canopied street trees will be consistent with City General Plan Policies 5.3.1(a) and 5.8-2(c). The project will not have an adverse effect on day or nighttime views in the area.

II.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

Impact:

No Impact

Finding:

The project will result in no impacts to agriculture and forestry resources in relation to the conversion of Farmland as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use. No mitigation measures are required.

Rationale:

The project will result in no impacts to agriculture and forestry resources in relation to the conversion of Farmland. The California Department of Conservation (CDC) FMMP has identified the project site as Urban and Built-Up Land at the statewide scale, and the area has not been surveyed at the county scale. All construction activities will be undertaken within the existing designated urban and built-up land area. No prime or unique farmland or farmland of statewide importance is located within the project area. There will be no permanent conversion of land to non-agricultural use due to the project. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located in or immediately adjacent to the project site.

- b) **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

Impact:

No Impact

Finding:

The project will result in no impacts in regards to conflicting with existing zoning for agricultural use, or Williamson Act contract land. No mitigation measures are required.

Rationale:

The project will result in no impacts to agriculture and forestry resources in relation to a conflict with existing zoning for agricultural use, or a Williamson Act contract. Based on the review of the CDC FMMP, the project area is designated non-enrolled land and not enrolled under a Williamson Act contract. There are no existing farmlands and lands designated for agricultural uses in the vicinity of the project site. The City of Los Angeles has designated the project site as CR: Regional Commercial, and adjacent properties as HI: Hybrid Industrial Zone to the north, PF: Public Facilities Zones to the east and south, designated as property as owned and used by a government agency, M3: Heavy Industrial Zone to the south, CM: Commercial Manufacturing Zone to the south, and OS: Open Space Zone and PF: Public/Quasi-Public Facilities Zones to the west in both the City's General Plan , and Zoning Plan. , The CDC FMMP has identified the area as Urban and Built-Up Land at the statewide scale and the area has not been surveyed at the County scale. Based on the review of the land use designations and applicable Important Farmland map for the project site, there are no Farmlands located in or immediately adjacent to the project site. No agricultural uses or related operations are present within the project site or surrounding area. Due to its urban setting, the site area is not included in the FMMP.

- c) Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

Impact:

No Impact

Finding:

The project will result in no impacts in regards to conflicting with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No mitigation measures are required.

Rationale:

The project will result in no impacts to agriculture and forestry resources in relation to conflict with existing zoning for, or cause rezoning of forest land, timberland, or timberland rezoned Timberland Production. The City of Los Angeles has designated the project site as CR: Regional Commercial, and adjacent properties as HI: Hybrid Industrial Zone to the north, PF: Public Facilities Zones to the east and south, designated as property as owned and used by a government agency, M3: Heavy Industrial Zone to the south, CM: Commercial Manufacturing Zone to the south, and OS: Open Space Zone and PF: Public/Quasi-Public Facilities Zones to the west in both the City's General Plan and Zoning Plan. The property is not suitable for forestry or timberland development, and there are no areas zoned as any type of forestland located within the project area. The project will not require areas adjacent to the

project site to be rezoned as the project will be undertaken within the existing designated urban and built-up land area.

d) Result in the loss of forest land or conversion of forest land to non-forest uses?

Impact:

No Impact

Finding:

The project will result in no impacts in regards to conflicting with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No mitigation measures are required.

Rationale:

The project will result in no impact to forest lands related to the loss of forest land or conversion of forest land to non-forest uses. The project is located within an existing designated urban and built-up land area and all construction activities will be undertaken within the existing designated urban and built-up land area. The Northgate Crossing Specific Plan Land Use element and Zoning Ordinance were reviewed to determine the compatibility of the project with adopted land use plans, policies, and regulations. The City of Los Angeles has designated the project site as CR: Regional Commercial, and adjacent properties as HI: Hybrid Industrial Zone to the north, PF: Public Facilities Zones to the east and south, designated as property as owned and used by a government agency, M3: Heavy Industrial Zone to the south, CM: Commercial Manufacturing Zone to the south, and OS: Open Space Zone and PF: Public/Quasi-Public Facilities Zones to the west in both the City's General Plan and Zoning Plan. Construction of the project will not add or change any land uses.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

Impact:

No Impact

Finding:

The project will result in no impacts in regards to other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No mitigation measures are required.

Rationale:

The project will result in no impacts to agriculture and forestry resources in relation to changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Based on the review of the CDC

FMMP, the project is located within an existing designated urban and built-up land area and all construction activities will be undertaken within the existing designated urban and built-up land area. The City of Los Angeles has designated the project site as CR: Regional Commercial, and adjacent properties as HI: Hybrid Industrial Zone to the north, PF: Public Facilities Zones to the east and south, designated as property as owned and used by a government agency, M3: Heavy Industrial Zone to the south, CM: Commercial Manufacturing Zone to the south, and OS: Open Space Zone and PF: Public/Quasi-Public Facilities Zones to the west in both the City's General Plan and Zoning Plan. The project will not affect the suitability of any designated farmland for development because the existing land use of the project area will not be changed. There are no forest lands in the project area.

II.3 AIR QUALITY

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to air quality in regard to conflicting with or obstructing implementation of the applicable air quality plan. No mitigation measures are required.

Rationale:

The project will result in less than significant impacts to air quality in regard to conflicting with or obstructing implementation of the applicable air quality plan. The 2016 Air Quality Management Plan (AQMP) by the South Coast Air Quality Management District (SCAQMD) was approved in March 2017; however, the Notice of Preparation for the project was released on December 22, 2016. Therefore, the approved 2012 AQMP is the applicable air quality plan. The purpose of the 2012 AQMP is to bring the South Coast Air Basin into compliance with the federal 24-hour PM_{2.5} air quality standard and to provide an update to the Basin's progress towards meeting the federal 8-hour ozone standards. As the Alameda Street and Los Angeles Street Improvements portions of the project are listed in the Southern California Association of Governments (SCAG) Federal Transportation Improvement Program (FTIP), they are consistent with the 2016–2040 SCAG Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). The remaining Arcadia Street improvements and forecourt area improvements will be minor by comparison and not result in any additional vehicle miles traveled (VMT) or generate substantial emissions. For air quality conformity with Caltrans, the project is listed as a transportation control measure in the SCAG FTIP, meaning it has been identified as a project that supports efforts to attain federal and state air quality standards. Despite an anticipated worsening of Level of Service (LOS) at certain study intersections as a result of the project, the project is intended to encourage mode shift to more active modes of transportation and to reduce vehicle miles traveled, which is aligned with the goals of the SCAG 2016–2040 RTP/SCS. This focus on more complete streets will help reduce the region's contribution to PM_{2.5} and ozone by reducing vehicle emissions, which is aligned with the goals in the 2012 AQMP. The traffic modelling documented in Section 4.2.3 of the EIR concluded that intersection LOS will worsen at several intersections as a result of the roadway capacity repurposing

associated with the implementation of the project. However, the analysis is conservative, because it assumes that vehicle trips will not shift to other travel modes, to alternative routes, or shift time periods as a result of worsened intersection level of service. This ensures that the maximum potential traffic impact envelope is identified in the EIR, but it is likely to overstate the effects to intersection operating conditions, because some of these shifts in mode, route, or time period will likely occur. As a key first/last mile connection, the project supports broader regional transportation and air quality goals that collectively will help to reduce regional air quality impacts. Therefore, the project will not conflict with the goals in the 2012 AQMP or SCAG 2016–2040 RTP/SCS to reduce transportation related emissions.

The project is also in alignment with the policies of the Central City North Community Plan and the Central City Community Plan related to air quality. The Central City North Community Plan adheres to the Los Angeles Citywide General Plan Framework Transportation Improvement and Mitigation Program (TIMP) as part of its Transportation Demand Management Program (TDM). The purpose of the TDM is to encourage people to use more efficient modes of transportation to reduce emissions. Through the Alameda Street improvements, the project incorporates more pedestrian and bicycle access to LAUS, a hub for transit services in the Los Angeles region. A grand consolidated pedestrian crossing improves connectivity between the El Pueblo de Los Angeles and LAUS. A small section of the project area on Los Angeles Street lies within the Central City Community Plan. Similar to the Central City North Community Plan, the project will not conflict with the Central City Community Plan for any air quality issues as the project promotes multi-modal access, provides a civic plaza as open space, and improves pedestrian and bicycle circulation. The project achieves this goal by making the streetscape more pedestrian friendly to encourage people out of their cars and onto transit, bicycles, and travel by foot.

Transportation Conformity

A transportation conformity determination is required for approval, funding, or implementation of FWHA/FTA projects. Once built, the project will not increase the number of vehicles in the vicinity or VMT because there is no development associated with the project. The project will simply accommodate existing demand and therefore not be considered a destination. As evaluated in Section 4.2.3, of the EIR, three intersections located in the project study area will experience worse LOS and average delay. Intersection #17 (Alameda Street and Cesar E. Chavez) will have its worse delay at the PM Peak Hour, while Intersection #19 (Alameda Street and Los Angeles Street) and #24 (Alameda Street and Arcadia Street) will have its worse delay in the AM Peak Hour. For PM Peak Hour, Intersection #17 at Alameda/Cesar Chavez will worsen from an existing LOS C in 2016 (29-second delay) to LOS D in 2029 (45-second delay), experiencing 7 seconds' delay from the project and an additional 9 seconds' delay from cumulative impacts. For AM Peak Hour, Intersection #19 at Alameda/Los Angeles St. will worsen from an existing LOS B (15-second delay) to LOS E (62-second delay), experiencing 26 seconds' delay from the project and an additional 21 seconds' delay from cumulative impacts. For AM Peak Hour, Intersection #24 at Alameda/Arcadia will worsen from an existing LOS E (78-second delay) to LOS F (120+ second delay), experiencing 8+ seconds' delay from the project and an additional 34 seconds' delay from cumulative impacts. The project, as the Alameda Street improvements only, is listed in the FTIP by SCAG as a transportation control measure and will have an overall benefit to air quality by providing pedestrian and biking facilities as well as more accessible transit options. The project was determined by the SCAG Transportation Conformity Working Group to be exempt from regional emissions analysis pursuant to Table 3 of §93.127 as an intersection channelization project.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to air quality related to the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction, operation, and maintenance. No mitigation measures are required.

Rationale:

The project will result in less than significant impacts to air quality related to the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction, operation, and maintenance. In order to meet sustainability goals, the project will use performance-based best management practices which may include, but are not limited to, porous paving, photovoltaic/piezoelectric components in the forecourt, shade trees to reduce the urban heat island effect, bioswales, recycled water for the central water feature, as well as water efficient and energy efficient fixtures in the small transit-serving building.

Construction

Construction emissions were calculated using CalEEMod 2016.3.1 per the construction scenario and assumptions. These emissions are compared to the SCAQMD significance thresholds in the Air Quality and Greenhouse Gas Emissions Technical Report, which is Appendix B to the EIR. Air quality thresholds are set to protect public health. All construction work will also adhere to the Metro Green Construction Policy.

Operation

The project is a bike and pedestrian infrastructure project with a roadway reconfiguration on Alameda Street and is not considered growth-inducing. As the project is located in an urbanized area directly adjacent and surrounded by multiple transit options (bus, light rail, heavy rail), it will be part of a high-quality transit corridor. The project will provide more open space through the civic area, but is not a destination in itself, as it is a component of LAUS and will not result in additional VMT. For these reasons, the VMT that will be generated by the project are assumed to be zero. Therefore, no operational mobile emissions were calculated.

The project will also eliminate the 60-space parking lot, which will reduce the amount of cold start emissions from cars. The forecourt area will not create any direct emissions through operation of the outdoor lighting water feature, or the small transit-serving building. Indirect emissions will be minimal as the operational usage of the forecourt area will require limited electricity and water usage to power the water feature and outdoor landscaping and safety lights, as well as the lighting and water fixtures in the small transit-serving building. The project's elements will result in 6.5 lb/day of VOCs, of which the small transit-serving building will not substantially contribute. This is well below the threshold of 55

lb/day per the SCAQMD significance thresholds (see Appendix B to the EIR, *Air Quality and Greenhouse Gas Emissions Technical Report*). The project will also provide a net 46 new trees in addition to the 80 existing trees that will remain on-site for a total of 164 trees. These trees will provide a benefit to air quality since they will sequester carbon dioxide from the air.

Maintenance

The project will require limited maintenance. The landscaping and small transit-serving building will require minimal upkeep. Maintenance activities typically do not cause substantial emissions and will be outweighed by the benefits resulting from the project's sustainability goals, which may include, but are not limited to, additional trees, bioswales, pedestrian/bicycle facilities, and reduction of vehicles in the project area as people shift to alternative modes of transportation.

Carbon Monoxide Hot Spot Analysis

As shown in the Appendix H, *Traffic Data*, to the EIR, LOS and average delay will worsen for all three intersections within the project study area. This is further worsened by development projects in the project vicinity area, which are considered in the cumulative impacts. However, the project will screen out in the CO Protocol² at Section 4, Level 7 in the CO Protocol's Figure 4, *Local CO Analysis*. To determine if a project worsens air quality (Section 4.7.1 of the CO Protocol), the project shall not increase overall traffic volumes, shall not increase the number of diesel vehicles on a permanent basis, shall not increase number of vehicles operating in cold start mode, and shall not worsen traffic flow. Because the project will worsen traffic flow (LOS), the project advances to section 4.7.2 of the CO Protocol and is further evaluated for proximity to receptors, roadway geometry, and other geographical and ambient air quality characteristics. With the project, receptors such as La Petite Academy and the Mozaic Apartments will be farther from the roadway because of the vehicle lane reduction, and the number of vehicles operating in cold start mode will be reduced with the removal of the short-term parking lot. The traffic lane volumes and percentage of heavy duty gas trucks will not be greater as a result of the project. While average delay is shown to increase at certain study intersections, as evaluated in Section 4.2.3 of the EIR, the traffic analysis is conservative, because it assumes that vehicle trips will not shift to other travel modes, to alternative routes, or shift time periods as a result of worsened intersection level of service. This ensures that the maximum potential traffic impact envelope is identified in the EIR, but it is likely to overstate the effects to intersection operating conditions, because some of these shifts in mode, route, or time period will likely occur. As a key first/last mile connection, the project during operation in the long term supports broader regional transportation and air quality goals to reduce pollutant concentrations at the project site. It is further evaluated for proximity to receptors, roadway geometry, and other geographical and ambient air quality characteristics. As shown in the CalEEMod modeling, the CO generated from the project during construction will also be less than significant (Appendix B to the EIR, *Air Quality and Greenhouse Gas Emissions Technical Report*). Because the project will not result in higher CO concentrations than those existing within the region at the time of attainment demonstration, the project is determined to be satisfactory for CO with no further analysis needed. The project screens out in Section 4.7.2 of the CO Protocol. Therefore, the project will not have the potential to cause or worsen a violation of the NAAQS for CO.

² California Department of Transportation. "Transportation Project-Level Carbon Monoxide Protocol." December 1997. Available at: http://www.dot.ca.gov/hq/env/air/documents/COProtocol_searchable.pdf

PM Hot Spot Analysis

The project is not considered a project of air quality concern for PM₁₀ and PM_{2.5} because it will not fulfill any of the criteria listed in 40 CFR 93.123(b)(1):

- New or expanded highway projects that have a significant number of or significant increase in diesel vehicles
- Projects affecting intersections at Level of Service (LOS) D, E, or F with a significant number of diesel vehicles or those that will change to LOS D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project
- New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location
- Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location
- Projects in or affecting locations, areas, or categories of sites that are identified in the PM_{2.5}- or PM₁₀-applicable implementation plan or implementation

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the proposed project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Impact:

Less than Significant

Finding:

The project will result in a less than significant impact to air quality related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. No mitigation measures are required.

Rationale:

The project will result in a less than significant impact to air quality related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. The project is located within the SCAB, which is in a federal non-attainment area for 1-hour ozone, 8-hour ozone, and PM_{2.5} and a state level non-attainment area for 1-hour ozone, 8-hour ozone, PM₁₀, and PM_{2.5}. Sixty-three development projects are located in the vicinity of the project, including Metro projects, residential development, commercial development, bus stop improvements, active transportation corridors, mixed-use projects, and more. However, the construction schedule for these projects will be staggered, and the emissions will be temporary and intermittent in nature as the projects move through the various construction stages. None of these projects will create significant long-term operational emissions as deduced from the nature of these projects not being stationary sources for industry or any large scale utility projects. In fact, many of these projects will result in a benefit to air quality as they provide better transit services, walking and biking facilities, transit-oriented

development, and higher density areas in an urban location, which will reduce VMT consistent with the 2016 SCAG RTP/SCS.

d) Expose sensitive receptors to substantial pollutant concentrations?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to air quality in regard to exposing sensitive receptors to substantial pollutant concentrations. No mitigation measures are required.

Rationale:

The project will result in a less than significant impact to air quality in regard to exposing sensitive receptors to substantial pollutant concentrations. The project will reduce the number of vehicle travel lanes along Alameda Street and add a forecourt and esplanade. The project will not cause additional vehicle trips and therefore will not generate substantial pollutant concentrations. These activities will not generate substantial pollutant concentrations as there will be no additional vehicle trips as a result of the project. Furthermore, the removal of the 60-space surface parking lot will reduce cold start emissions from vehicles near sensitive receptors. The relocation of driveways into LAUS and the addition of curbside drop offs on Alameda Street will likely reduce the number of vehicles from turning into LAUS from Alameda Street and direct traffic away from the sensitive receptors. Both the Mozaic Apartments and La Petite Academy, a daycare located in the First 5 LA building, are located adjacent to the project boundary and are considered sensitive receptors. The Mozaic Apartments are the closest residence. While construction will require off-road diesel equipment and hauling trucks to be used, these impacts are short term and intermittent in nature. As evaluated in the CalEEMod run, both construction and operational impacts to air quality will be less than significant.

e) Create objectionable odors affecting a substantial number of people?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to air quality in regard to exposing a substantial number of people to objectionable odors. No mitigation measures are required.

Rationale:

The project will result in less than significant impacts to air quality in regard to exposing a substantial number of people to objectionable odors. According to the SCAQMD's CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.

The nature of the project is to create a more pedestrian- and bike-friendly entrance to LAUS that will reduce vehicle traffic in the area as people shift to other more sustainable modes of transportation. This type of project is not a typical source of odors. The project will not incorporate any uses identified by the SCAQMD as being associated with odors, or any comparable use that will be expected to generate nuisance odors. The vehicle lane reduction on Alameda Street will cause more idling and delay of vehicles in the short term that will result in increased emissions, but this impact will be less than significant as people recognize that other active transportation modes are available and VMT is reduced. The traffic modelling documented in Section 4.2.3 of the EIR concludes that intersection LOS will worsen at several intersections as a result of the roadway capacity repurposing associated with the implementation of the project. However, the analysis is conservative, because it assumes that vehicle trips will not shift to other travel modes, to alternative routes, or shift time periods as a result of worsened intersection level of service. This ensures that the maximum potential traffic impact envelope is identified in the EIR, but it is likely to overstate the effects to intersection operating conditions, because some of these shifts in mode, route, or time period will likely occur. As a key first/last mile connection, the project supports broader regional transportation and air quality goals that collectively will help to reduce regional air quality impacts. As a result, the project will result in a less than significant impact to creating objectionable odors affecting a substantial number of people.

II.4 BIOLOGICAL RESOURCES

Would the project:

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

Impact:

No Impact

Finding:

The project will result in no impacts to biological resources in relation to species listed as rare, threatened, or endangered pursuant to the federal and state Endangered Species Acts (ESAs). The project will result in no impacts to biological resources in relation to species recognized by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or in local regional plans, policies, or regulations as sensitive or special status. No mitigation measures are required.

Rationale:

Listed Species

The project will result in no impacts to biological resources in relation to species listed as rare, threatened, or endangered pursuant to the federal and state ESAs. This determination is based on the habitat requirements and historical occurrences of the listed species with the potential to occur in the project site. Due to the lack of habitats suitable to support the subject species, they have been determined to be absent from the project site.

Other Sensitive and Locally Important Species

The project will result in no impacts to biological resources in relation to species recognized by the USFWS, CDFW, or in local regional plans, policies, or regulations as sensitive or special status. This determination is based on the habitat requirements and historical occurrences of the sensitive species with the potential to occur in the project site. Only one species, American peregrine falcon, has the potential to occur at the project site due to the presence of suitable habitat. However, the nearest historical record of peregrine falcon occurred over 5 miles northeast of the project site. There is no suitable habitat present for any of the remaining sensitive and locally important species identified in the records search.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Impact:

No Impact

Finding:

The project will result in no impacts to biological resources in relation to riparian habitat or other sensitive natural communities. No mitigation measures are required.

Rationale:

The project will result in no impacts to biological resources in relation to riparian habitat or other sensitive natural communities. The closest state-designated sensitive community or riparian habitat, Walnut Forest, is located approximately 3.5 miles to the northeast of the project site.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact:

No Impact

Finding:

The project will result in no impacts to biological resources in relation to federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. No mitigation is required.

Rationale:

The project will result in no impacts to biological resources in relation to federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. The closest wetland or blue-line drainage is the concrete-lined channel of the Los Angeles River, approximately 0.5 miles east of the project site. The project will not include direct removal, filling, hydrological interruption, or other alterations to the nearby federally protected wetlands or other waters of the United States.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact:

No Impact

Finding:

The project will result in no impacts to biological resources in relation to federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. No mitigation measures are required.

Rationale:

The project will not conflict with any local policies or ordinances protecting biological resources. No trees protected by the City of Los Angeles Protected Tree Ordinance will be removed by the project. Removal of other street trees not protected under the ordinance will require the acquisition of a street tree removal permit from the City of Los Angeles Bureau of Public Works, UFD. Trees will be removed and replaced in accordance with the current requirements of the UFD.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact:

No Impact

Finding:

The project will result in no impacts to biological resources in relation to federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. No mitigation measures are required.

Rationale:

The project will result in no impacts to biological resources in regard to conflicting with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other

approved local, regional, or State Habitat Conservation Plan. There are no HCPs or NCCPs with boundaries that intersect the project site.

II.5 ENERGY

Would the project:

a) Conflict with adopted energy conservation and other sustainability metrics in local plans?

Impact:

No Impact

Finding:

The project will result in no impacts in regard to conflicting with adopted energy conservation and other sustainability metrics in local plans. No mitigation measures are required.

Rationale:

Construction

Construction of the project will consume energy from off-road construction vehicles and equipment, as well as on-road vehicles used for construction worker travel to and from the site and delivery and haul trips (see Appendix E to the EIR, Energy Worksheets). Energy consumed during construction will also be required to produce and convey the water needed for dust control. However, such trips are accounted for the Southern California Association of Governments 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy.³

As described in Section 2.5, *Construction Scenario and Assumptions*, of the EIR, the construction of the project will require the use of 1 concrete saw, 1 rubber-tired dozer, 3 tractor/loader or backhoes, and 2 hydraulic excavators for the demolition phase over a period of 40 days. There will be 92 truck trips to haul away material resulting from the demolition and an additional 38 truck trips to haul away the trees which are removed. During the grading phase of construction, 2 graders and 1 rubber-tired dozer will be used for 40 days. During the paving phase of construction, 1 cement and mortar mixer, 1 paver, 1 roller, and 1 tractor/loader or backhoe will be used for 30 days. It is anticipated that 131 truck trips will be made during the paving phase. During site preparation, 1 grader will be used, 1 rubber-tired dozer, and 1 tractor/loader or backhoe will be used for 30 days. An anticipated 87 truck trips will be made to the site to deliver the new trees. An additional 10 hauling trips will be added for landscaping. During the operation of the project, it is anticipated that transit use will increase, as well as bicycle and pedestrian activity, and the use of passenger vehicles will decrease to the site over time.

³ Southern California Association of Governments. 7 April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

During construction, electricity for water supply and petroleum fuels used for on- and off-site construction equipment will be consumed. All construction vehicles and equipment will be in compliance with Metro's Green Construction Policy, thus ensuring the impacts on energy use and GHG emissions and will be less than significant. Compliance with Metro's green construction policy include restricting vehicle and equipment idling to a maximum of 5 minutes, subject to certain exceptions, and retrofitting diesel-powered construction equipment to use cleaner fuels and/or trap particulate matter. In addition, construction activities will be temporary.

Operation

Energy used during the operation of the project will be consumed by the street lights, pedestrian lighting, and the supply of water for the interactive water feature and landscaping, as well as for the small transit-serving building.

Currently, on the project site along Alameda Street, there are 16 historic double-headed street lights and 6 single-headed cobra style street lights. The project will also add 49 bollards in the forecourt and along the Alameda Street median. During operation of the project, energy will be consumed by the streetlamps and pedestrian lighting in the forecourt area, and along the Alameda Esplanade. Metro has the goal to retrofit all of the street light fixtures located in the project area to LED bulbs, while retaining the historic street light uprights, in adherence to the City of Los Angeles Bureau of Street Services street light LED conversion program. LED lighting technology is more efficient consistent with adopted energy conservation and other sustainability metrics in local plans.⁴

Metro has a commitment to reduction of water use at their facilities. In 2009, the Metro Board adopted a water use and conservation policy.⁵ This was followed by the adoption of their Water Action Plan in 2010.⁶ In the midst of a long-term statewide drought in June 2015, the Metro Board adopted a drought awareness motion requiring the agency to reduce amount of potable water use by 20 percent by 2017 from the 2015 baseline.⁷ As part of the Environmental Management System (EMS), Metro has tracked water consumption at their facilities since 2014.

The project will include a new interactive water feature and a net increase of 46 trees to the project site. The current project description includes a well for each new tree that will allow for the planting of additional trees without increasing the consumptive use of water, consistent with Metro's Water Action Plan.⁸ In addition, the landscaping will consist of native species and be drought tolerant once established. Each new tree will require an estimated 168 gallons of water to become established and approximately 365 gallons of water annually to maintain.⁹ The use of native and drought tolerant trees adheres to the City of Los Angeles Alameda District Specific Plan requirement that drought-tolerant and low water consuming plant varieties are to be used to reduce irrigation water consumption in new

⁴ <https://blog.lsgc.com/street-lighting-comparison-led-vs-hps/>, accessed 16 June 2017.

⁵ http://media.metro.net/about_us/sustainability/images/Water-Use-and-Conservation-GEN-52-Policy.pdf, accessed 16 June 2017.

⁶ http://media.metro.net/projects_studies/sustainability/images/Water_Plan2010_0825.pdf, accessed 16 June 2017.

⁷ http://libraryarchives.metro.net/DB_Attachments/150625_Motion_52_Drought_Awareness.pdf, accessed 16 June 2017.

⁸ Los Angeles County Metropolitan Transportation Authority. June 2010. Water Action Plan. Available at: http://media.metro.net/projects_studies/sustainability/images/Water_Plan2010_0825.pdf

⁹ <https://bss.lacity.org/UrbanForestry/StreetTree/TreePlanting.htm>, accessed 15 June 2017.

landscaped areas such as pedestrian plazas, walkways, and other open spaces. Therefore, the project will result in no impacts in regard to conflicting with adopted energy conservation and other sustainability metrics in local plans.

The interactive water feature is anticipated to use a water recirculation system requiring approximately 160 gallons of water per minute (GPM), therefore, using just under 55,000 gallons a day¹⁰ to operate. This equates to approximately 535 kilowatt-hours (kWh) in energy required daily to provide that water to the water feature. Interactive water features are not covered by any locally adopted energy conservation and other sustainability metrics in local plans, therefore, the energy impacts from this project feature will be less than significant.

The small transit-serving building will feature water efficient fixtures, including a toilet, a urinal, and a sink. Together, these fixtures will utilize 25.7 kWh/year.¹¹ The use of water efficient fixtures will be consistent with local plans and policies requiring energy efficient buildings.

Metro has determined that LAUS, as a major transit hub in Southern California, has facilitated the occurrence of compact and transit-oriented development in the vicinity. The project improvements will further enhance the forecourt and pedestrian and bicycling connections to El Pueblo de Los Angeles Historic Park; Father Serra Park; and other nearby amenities, businesses, and neighborhoods in a manner that will be expected to continue to encourage the use of alternative modes of travel and reduce per capita vehicle miles traveled.

b) Use energy resources in a wasteful and inefficient manner?

Impact:

Less than Significant

Finding:

The project will result in less than significant impact to using energy resources in a wasteful and inefficient manner. No mitigation measures are required.

Rationale:

The project will result in less than significant impact to using energy resources in a wasteful and inefficient manner. Specific measures incorporated into the project design will ensure that energy is being used in the most efficient manner possible. If the bollards are equipped with lighting, LED technology will be utilized.

The project is designed to utilize a series of swales in addition to permeable paving to receive and infiltrate a majority of the site's stormwater drainage in the forecourt. This will help to reduce the amount of water needed to be imported for landscaping purposes. The interactive water feature will

¹⁰ Recreation Management. Accessed 13 June 2017. Splashplay, Splashpads Get Greener, Innovative Systems Reuse and Replenish Every Splash.

¹¹ California Code of Regulations, Title 20, Public Utilities and Energy.

utilize a water recirculation system to ensure the most efficient use of water for this type of project feature. Because the project design features the use of energy and water efficient technologies, as well as the construction of swales and use of permeable paving in the forecourt to promote the capture of on-site water, the project will have a less than significant impact on using energy resources in a wasteful and inefficient manner.

c) Would the proposed project decrease reliance on fossil fuels such as coal, natural gas, and oil?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts in regard to decreasing reliance on fossil fuels such as coal, natural gas, and oil. No mitigation measures are required.

Rationale:

The project will result in less than significant impacts in regard to decreasing reliance on fossil fuels such as coal, natural gas, and oil. During construction, the energy consumed will be from the electricity for the water supplied for fugitive dust mitigation and the petroleum fuels used for on- and off-site construction equipment. Because the construction activities will be temporary, there will be no long-term energy impacts associated with the construction of the project.

The project is being designed to decrease transportation energy use by encouraging more pedestrian, bicycle, and transit connectivity to LAUS. The sidewalks within the project area will be widened. Bicycle kiosks will remain on the site. According to SCAG's research on the impact of active transportation on high quality transit areas, transit use could increase up to 53 percent by 2040 with the development of infrastructure projects that encourage active transportation, such as the project.¹² Therefore, it is anticipated that the project will result in an increase in active transportation and transit use, and the use of personal automobiles and the commensurate consumption of petroleum fuel will decrease over the long term.

II.6 GEOLOGY AND SOILS

Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

¹² Southern California Association of Governments. Accessed 20 January 2017. *2016-2040 RTP/SCS. Transportation Systems Active Transportation Appendix*, p. 69, Tables 18, 19.

Impact:

No Impact

Finding:

The project will result in no impact to geology and soils in relation to exposing people or structures to potential substantial effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. No mitigation measures are required.

Rationale:

The project will result in no impact to geology and soils in relation to exposing people or structures to potential substantial effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. No known active faults are located within the project study area, and the project study area is not located within the 2001 CGS AP Earthquake Fault Zone (APEFZ) map or City of Los Angeles Safety Element Fault Rupture Study Areas. As such the alternatives will not be at risk of damage from surface fault ruptures of any known faults.

ii) Strong seismic ground shaking?

Impact:

Less than Significant

Finding:

The project will result in a less than significant impact to geology and soils in relation to exposing people or structures to potential adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. No mitigation measures are required.

Rationale:

The project will not result in a significant impact to geology and soils in relation to exposing people or structures to potential adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. While the project is in a seismically active region and will result in a change to the surface structure and use of some portions of the project area, it will not represent a change in land use from the existing environment. As such, it is not anticipated to exacerbate the project area's existing vulnerability to strong seismic ground shaking events. All structures will be designed in accordance with appropriate industry standards, including established engineering and construction practices and methods.

iii) Seismic-related ground failure, including liquefaction?

Impact:

Less than Significant

Finding:

The project will result in a less than significant impact to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. No mitigation measures are required.

Rationale:

The project will result in a less than significant impact to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Liquefaction within the study area during a seismic event will result in the loss of structural integrity of the perimeter improvements and the surrounding structures. Damage or collapse of these structures will put human lives in the vicinity at risk of bodily injury or death. While the study area is located within a CGS-mapped liquefaction zone, previous geotechnical investigations^{13,14} have found the area unlikely to be susceptible to liquefaction.

iv) Landslides**Impact:**

No Impact

Finding:

The project will result in no impact to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No mitigation measures are required.

Rationale:

The project will result in no impact to geology and soils in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Based on the relatively level topography of the project study area, the landslide potential is low.¹⁵

b) Result in substantial soil erosion or the loss of topsoil?**Impact:**

Less than Significant

¹³ Diaz Yourman & Associates. Revised 29 October 2009. Geotechnical Investigation, Union Station, Mail Dock Conversion to Passenger Platform, Los Angeles, California.

¹⁴ Diaz Yourman & Associates. Revised 4 August 2010. *Preliminary Foundation Report, Union/Patsaouras Plaza Busway Station, 07-LA-10PM 17.20, LA Busway Bridge OH, Bridges Nos. 53-2673 & 53-New (POC), Los Angeles, California.*

¹⁵ Diaz-Yourman & Associates. 14 March 2013. *Geotechnical Analysis Technical Memorandum, Los Angeles Union Station Master Plan, Los Angeles, California.*

Finding:

The project will result in a less than significant impact to geology and soils with regard to resulting in substantial soil erosion or the loss of topsoil. No mitigation measures are required.

Rationale:

The project will result in a less than significant impact to geology and soils with regard to resulting in substantial soil erosion or the loss of topsoil. Construction of the perimeter improvement will require excavation of up to 15 feet of soil materials, which will require temporary or permanent soil displacements and will leave soils vulnerable to wind and water erosion. The study area is currently highly developed and covered with impervious surfaces. While excavation, grading, or transportation of soils from the study area will remove or displace topsoil, these activities will not remove any soils currently used for agricultural or biological purposes.

While soils during construction will be vulnerable to wind and water erosion, the construction contractor will be required to incorporate stormwater BMPs consistent with the California Storm Water Best Management Practice Handbooks: Construction. This will reduce the potential for soil loss during construction. Once construction is completed, soils within the study area will be covered with impervious surfaces and will no longer be vulnerable to wind or surface water erosion.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

Impact:

Less than Significant

Finding:

The project will result in a less than significant impact to geology and soils in relation to being located on a geologic unit or soil that is unstable or that will become unstable as a result of the project. No mitigation measures are required.

Rationale:

The project will result in a less than significant impact to geology and soils in relation to being located on a geologic unit or soil that is unstable or that will become unstable as a result of the project. The project study area does not occur within an unstable geologic unit. As identified in Section 3.8.2, the study area has a low potential for subsidence, landslides, and liquefaction. Geotechnical investigations of the study area have found that the soils currently underlying the structures are not in the loose to medium-dense category, and are not prone to seismic settlement or differential compaction. The project is not anticipated to result in decreased soil stability underlying the site, and will not increase the potential for on- or off-site landslide, liquefaction, or subsidence related events.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to geology and soils in relation to being located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. No mitigation measures are required.

Rationale:

The project will result in a less than significant impact to geology and soils in relation to being located on an expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. Based on the type of soils identified in the project study area, expansive soils are not expected to be a concern. The soils and groundwater underlying the study area are classified as severely corrosive to buried metal pipes and have high soluble sulfate content. The project and constructed features are not anticipated to increase the corrosivity of soils underlying the study area.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Impact:

No Impact

Finding:

The project will result in no impact to geology and soils in relation to having soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. No mitigation measures are required.

Rationale:

The project will result in no impact to geology and soils in relation to having soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. The project's sanitary sewer flows will be connected to municipal sewer systems and no septic tanks or alternative wastewater disposal systems are proposed.

II.7 GREENHOUSE GAS EMISSIONS

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to greenhouse gas (GHG) emissions in regard to generating GHG emissions, either directly or indirectly, that may have a significant effect on the environment. No mitigation measures are required.

Rationale:

Construction

The project is estimated to produce approximately 153 metric tons (MT) of carbon dioxide equivalent (CO₂e) per year during the construction phase (see Appendix B to the EIR, *Air Quality and Greenhouse Gas Emissions Technical Report*). Because the project will reduce vehicle emissions and provide a multi-use path and a civic plaza, the project will not generate a significant amount of GHG emissions. Metro's Green Construction Policy will require implementation of best management practices for reducing diesel exhaust emissions for both on-road and off-road equipment/vehicles. As the Los Angeles pLAN and SCAQMD do not specify project level goals for GHG emissions, the Sacramento Metropolitan Air Quality Management District (SMAQMD) Recommended Guidance for Land Use Emission Reduction Version 3.2 was used as a proxy for comparison. The SMAQMD Guidance states that 1,100 MT CO₂e/year is the significance threshold for construction emissions. The project will be well below that threshold.

Operation

The project is estimated to produce 126 MT CO₂e/year during the operational phase (Appendix B to the EIR, *Air Quality and Greenhouse Gas Emissions Technical Report*). Similar to the construction phase, the SMAQMD Guidance was used to establish an operational GHG emissions threshold for comparison. The SMAQMD Guidance states that 1,100 MT CO₂e/year is the significance threshold for operational emissions. The project will be well below that threshold.

- b) **Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Impact:

No Impact

Finding:

The project will result in no impact to GHG emissions in regard to conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. No mitigation measures are required.

Rationale:

The project will result in no impact to GHG emissions in regard to conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The applicable policy for the project in regard to regulating GHG emissions is Assembly Bill (AB) 32, which mandates a reduction of GHG emissions to 1990 levels by 2020. This goal is embodied on the city level in GreenLA, which uses a multiprong approach targeting energy, water, transportation, waste, open space, and a green economy to reduce GHG emissions in Los Angeles. Written in 2007, GreenLA set the goal of reducing the city's GHG emissions to 35 percent below 1990 levels by 2030. The project will improve mobility without increasing vehicle usage and create more livable spaces in the urban core, which are actions in alignment with the strategies in GreenLA. As a forecourt and esplanade improvements project, the project will not generate a significant amount of GHG emissions in either the construction or operation phase. Construction emissions will be further reduced by adherence to Metro's Green Construction Policy. The project is also listed in the SCAG 2016–2040 RTP/SCS, so it is consistent with regional plans to reduce GHG emissions. Most recently, the City of Los Angeles produced the 2015 Sustainable City pLAN. The project is consistent with the pLAN because it will support public transit, walking, and cycling. Improving the facilities at a transportation hub like Union Station will further reduce transportation emissions, consistent with the pLAN, since people will be encouraged to get out of their vehicles. The project will not hinder, but rather help, Los Angeles reach the GHG emissions targets of 20 percent below the 1990 baseline by 2013 and 45 percent below the 1990 baseline by 2025.

II.8 HAZARDS AND HAZARDOUS MATERIALS**Would the project:**

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Impact:

Less than Significant

Finding:

The proposed project would result in less than significant impacts to hazards and hazardous materials related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No mitigation measures are required.

Rationale:

The proposed project consists of improvements to facilitate alternative transportation, particularly pedestrians and cyclists, including connections to rail and bus. The transport, use, and storage of

hazardous materials are governed by a range of federal, state, and local statutes and regulations. These improvements would require incidental use of cleaning supplies, fuels, herbicides, and pesticides. Since Metro is a public agency, the use and storage of these materials is regulated by a Business Plan. The purpose of a Business Plan is to prevent or minimize the damage to public health and safety and the environment from a release or threatened release of hazardous materials. It also satisfies community right-to-know laws. This is accomplished by requiring businesses that handle hazardous materials in quantities equal to or greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity to (1) inventory their hazardous materials, (2) develop a site map, (3) develop an emergency plan, and (4) implement a training program for employees. Businesses must submit this information electronically to the statewide information management system (California Environmental Reporting System, or CERS). Once the submittal has been made, the local implementing agency (Certified Unified Program Agency or CUPA) will verify the information and provide it to agencies responsible for the protection of public health and safety and the environment. These agencies include Fire Departments, Hazardous Materials Response Teams, or Local Environmental Regulatory. The application of herbicides and pesticides must be performed under the supervision of a licensed applicator, consistent with the specifications if the Materials Data Safety Sheet.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Impact:

No Impact

Finding:

The proposed project would result in no impacts to hazards and hazardous materials in relation to being located on a site which is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. No mitigation measures are required.

Rationale:

The proposed project would result in no impacts to hazards and hazardous materials in relation to being located on a site which is included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. The proposed project is not located on a site included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5.

- e) For a project located within an airport land use, plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

Impact:

No Impact

Finding:

The proposed project would result in no impacts to hazards and hazardous materials in relation to being located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. No mitigation measures are required.

Rationale:

The proposed project would result in no impacts to hazards and hazardous materials in relation to being located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. No public airports or public use airports are in the project vicinity.

f) For a project within the vicinity of a private airstrip, the would project result in a safety hazard for people residing or working in the project area?

Impact:

No Impact

Finding:

The proposed project would result in no impacts to hazards and hazardous materials in relation to being located within the vicinity of a private airstrip. No mitigation measures are required.

Rationale:

The proposed project would result in no impacts to hazards and hazardous materials in relation to being located within the vicinity of a private airstrip. No private airstrips are in the project vicinity.

g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Impact:

No Impact

Finding:

The proposed project would result in no impacts to hazards and hazardous materials in relation to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. No mitigation measures are required.

Rationale:

The proposed project would result in no impacts to hazards and hazardous materials in relation to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. The project site is not included in any emergency response plan or any emergency evacuation plan.

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

Impact:

No Impact

Finding:

The proposed project would result in no impacts to hazards and hazardous materials in relation to exposing people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No mitigation measures are required.

Rationale:

The proposed project would result in no impacts to hazards and hazardous materials in relation to exposing people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The project site is located in a major metropolitan area, and it is not located within a severe fire hazard zone.

II.9 HYDROLOGY AND WATER QUALITY

Would the project:

- a) Violate any water quality standards or waste discharge requirements?**

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to hydrology and water quality in relation to water quality standards or waste discharge requirements. No mitigation measures are required.

Rationale:

The project will result in less than significant impacts to hydrology and water quality in relation to water quality standards or waste discharge requirements. A significant impact will occur if the project violated any water quality or waste discharge requirements. Site drainage is controlled by sheet flow, surface infiltration and City-maintained storm drains located along nearby streets. Regional drainage is provided by the Los Angeles River, which is located approximately 0.5 miles east of the project site. Low-impact development (LID) best management practices (BMPs) will be implemented in accordance with the

City's LID Ordinance to capture and reuse stormwater to prevent polluted stormwater from leaving the project site.

The Alameda Street element has been designed to reduce the total area for impermeable surface. The Alameda Street element of the project has been designed to replace the 15 existing trees with 69 trees, thus increasing the total permeable area between Cesar Chavez Street and Arcadia Street by approximately three times. Similarly, the design of the Forecourt element of the project includes replacing a majority of the existing concrete and paved surfaces with permeable materials such as granite and porous paving materials, including porphyry pavers and porous concrete or comparable materials, to promote a porous ground plane. Other water conserving devices such as bioswales and subsurface water retention facilities may also be used in conjunction with the landscape elements of the Forecourt. Therefore, the project will reduce rather than increase sheet flow and storm water runoff, by enhancing on-site infiltration of storm water (within Metro property), and there will be no need for new storm drains.

The project will result in the replacement of existing concrete sidewalks, paved roadways and parking lots with roughly 170,000 square feet of sidewalk and pavement.

The Regional Water Quality Control Board (RWQCB) regulates runoff during clearing, grading, and excavation activities that may result in soil disturbance of any construction site of at least 1 acre of total land area. Additionally, the City LID Ordinance further regulates Development or Redevelopment that creates, adds or replaces 500 square feet or more of impervious area. The total project site encompasses approximately 6.71 acres, and therefore, construction activities will be subject to the requirements of a National Pollutant Discharge Elimination System (NPDES) Permit issued by the RWQCB, as well as City LID requirements. The NPDES General Construction Permit requires that all developers of land where construction activities will occur over more than 1 acre to (1) develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards; and (2) eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States. The SWPPP includes minimization of erosion, stabilization of construction areas, sediment control, control of pollutants from construction materials, as well as post-construction stormwater management (e.g., the minimization of impervious surfaces, treatment of stormwater runoff, etc.). The SWPPP must include a monitoring program that covers inspections and maintenance of BMPs. The City of Los Angeles Development Best Management Practices Handbook, Part A, Construction Activities, Second Edition, contains specific minimum BMP requirements for all construction activities. During project operation, a Standard Urban Stormwater Management Plan (SUSMP) is required to be implemented. The SUSMP and LID Ordinance contains required BMPs described in the City of Los Angeles Development Best Management Practices Handbook, Part B, Planning Activities. The SUSMP and LID Ordinance requires developers to mitigate (infiltrate or treat) the stormwater runoff (volume or flow rate) generated from 0.75 inches of rainfall over 24 hours.

The project will comply with all of the requirements set forth in the City's NPDES Development Planning Program and will incorporate appropriate BMPs in accordance the City's LID Ordinance, that are designed to reduce the potential pollutants of concern in the project's surface water runoff. The project's SUSMP and LID Plan will be reviewed and revised over time to ensure that BMPs are functioning properly and are effective at treating runoff from the site throughout the life of the project. The project will also incorporate BMPs that will detain surface water runoff as well as treating these

waters, either actively or passively, before discharging these waters to the local storm drain system. Through the incorporation of the requisite BMPs, development of the project is anticipated to improve the quality of the water discharged from the site, compared to existing conditions.

- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

Impact:

No Impact

Finding:

The project will result in no impacts to groundwater supplies or groundwater recharge. The project area is served by the Los Angeles Department of Water and Power (LADWP) municipal water supply system and will not use local groundwater. No mitigation measures are required.

Rationale:

The project will result in no impacts to groundwater supplies or groundwater recharge. The project area is served by the LADWP municipal water supply system and will not use local groundwater. The Los LADWP is responsible for providing water services to the project site. Most of the City's water supply is purchased from the MWD, with the remainder supplied by the Los Angeles Aqueduct, local groundwater, and recycled water. Pursuant to Senate Bill (SB) 610 and SB 221, LADWP is not required to conduct a Water Supply Assessment because the project does not trigger any of the three thresholds requiring preparation of a water supply assessment for an industrial park.

The increase of impervious areas resulting from the project could reduce percolation, which could result in a reduction in groundwater recharge. The Alameda Street element has been designed to reduce the total area for impermeable surface by replacing 15 existing trees with 69 trees, thus increasing the total permeable area between Cesar Chavez Street and Arcadia Street by approximately three times. Similarly, the design of the Forecourt element of the project includes replacing a majority of the existing concrete and paved surfaces with permeable materials such as granite and porous paving materials, including porphyry pavers and porous concrete or comparable materials, to promote a porous ground plane. Other water conserving devices such as bioswales and subsurface water retention facilities may also be used in conjunction with the landscape elements of the Forecourt. Compliance with City SUSMP requirements will percolate up to 0.75 inch of captured rainfall over a 24-hour period to provide additional recharge. The project also complies with the objectives of Metro's Water Action Plan.¹⁶ Thus, the project has the potential to facilitate stormwater capture, retention, and recharge.

¹⁶ Los Angeles County Metropolitan Transportation Authority. June 2010. *Water Action Plan*. Prepared by ICF International and Brezacak & Associates Planning. Available at: http://media.metro.net/projects_studies/sustainability/images/Water_Plan2010_0825.pdf

- c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

Impact:

No Impact

Finding:

The project will result in no impacts to alteration of existing drainage patterns in a manner that will result in substantial erosion or siltation on- or off-site. No mitigation measures are required.

Rationale:

The project will result in no impacts to alteration of existing drainage patterns in a manner that will result in substantial erosion or siltation on- or off-site. There are no streams or rivers located in the immediate vicinity of project site. Project construction will temporarily expose on-site soils to surface water runoff. However, compliance with the required provisions of the SWPPP will minimize the potential for erosion and siltation. During project operation, stormwater or any runoff irrigation waters will be directed into existing storm drains from the forecourt. The Alameda Street element has been designed to reduce the total area for impermeable surface by replacing 15 existing trees with 69 trees, thus increasing the total permeable area between Cesar Chavez Street and Arcadia Street by approximately three times. Similarly, the design of the Forecourt element of the project includes replacing a majority of the existing concrete and paved surfaces with permeable materials such as granite and porous paving materials, including porphyry pavers and porous concrete or comparable materials, to promote a porous ground plane. Other water conserving devices such as bioswales and subsurface water retention facilities may also be used in conjunction with the landscape elements of the Forecourt. Therefore, the project will reduce rather than increase sheet flow and storm water runoff, by enhancing on-site infiltration of storm water (within Metro property), and there will be no need for new storm drains.

- d) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Impact:

No Impact

Finding:

The project will result in no impacts to alteration of existing drainage patterns in a manner that will result in flooding on-site or off-site. No mitigation measures are required.

Rationale:

The project will result in no impacts to alteration of existing drainage patterns in a manner that will result in flooding on-site or off-site. The project site is relatively level throughout. A significant impact will occur if the project substantially altered the drainage pattern of an existing stream or river so that flooding will result. Based on a review of the 7.5-minute series topographical map, there are no streams or rivers located in the immediate vicinity of the project site. Under the project, stormwater or any runoff irrigation waters will be directed into existing storm drains. The Alameda Street element has been designed to reduce the total area for impermeable surface by replacing the 15 existing trees with 69 trees, thus increasing the total permeable area between Cesar Chavez Street and Arcadia Street by approximately three times. Similarly, the design of the Forecourt element of the project includes replacing a majority of the existing concrete and paved surfaces with permeable materials such as granite and porous paving materials, including porphyry pavers and porous concrete or comparable materials, to promote a porous ground plane. The construction of a 300-square-foot small transit serving building will not substantially increase surface runoff. Other water conserving devices such as bioswales and subsurface water retention facilities may also be used in conjunction with the landscape elements of the Forecourt. New areas of landscaping and compliance with SUSMP requirements will allow for percolation and a reduction of runoff. Therefore, the project will reduce rather than increase sheet flow and storm water runoff, by enhancing on-site infiltration of storm water (within Metro property), and there will be no need for new storm drains.

- e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Impact:

No Impact

Finding:

The project will result in no impacts related to exceeding the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff. No mitigation measures are required.

Rationale:

The project will result in no impacts related to exceeding the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff. A significant impact will occur if runoff water exceeded the capacity of existing or planned storm drain systems. The Alameda Street element has been designed to reduce the total area for impermeable surface by replacing 15 existing trees with 69 trees, thus increasing the total permeable area between Cesar Chavez Street and Arcadia Street by approximately three times. Similarly, the design of the Forecourt element of the project includes replacing a majority of the existing concrete and paved surfaces with permeable materials such as granite and porous paving materials, including porphyry pavers and porous concrete to promote a porous ground plane. The construction of a 300-square-foot small transit serving building will not substantially increase surface runoff. Other water conserving devices such as bioswales and subsurface water retention facilities may also be used in conjunction with the landscape elements of the Forecourt. New areas of permeable paving and landscaping will allow for percolation and reduction of

runoff, and water runoff after development will not exceed the capacity of existing or planned drainage systems. In addition, with the implementation of the required SWPPP during construction and the SUSMP and LID Plan as applicable during project operation, any potential sources of polluted runoff will be effectively controlled. The project will not create or contribute runoff water that will exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff.

f) Otherwise substantially degrade water quality?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to hydrology and water quality in relation to substantial degradation of water quality. No mitigation measures are required.

Rationale:

The project will result in less than significant impacts to hydrology and water quality in relation to substantial degradation of water quality. The closest drainage is the concrete-lined channel of the Los Angeles River, approximately 0.5 miles east of the project site. The project will not include direct removal, filling, hydrological interruption, or other alterations to the Los Angeles River. Project construction activities will occur in accordance with the Los Angeles Building Code Sections 91.7000 through 91.7016, which require necessary permits, plan checks, and inspections to reduce the effects of sedimentation and erosion. Additionally, project construction will occur in accordance with standard procedures established by the RWQCB and project compliance with the City's SUSMP requirements.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Impact:

No Impact

Finding:

The project will result in no impacts to hydrology and water quality in relation to placement of housing within a 100-year flood hazard area. No mitigation measures are required.

Rationale:

The project will result in no impacts to hydrology and water quality in relation to placement of housing within a 100-year flood hazard area. No housing is proposed as part of the project.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Impact:

No Impact

Finding:

The project will result in no impacts to hydrology and water quality in relation to placement of structures within a 100-year flood hazard area. No mitigation measures are required.

Rationale:

The project will result in no impacts to hydrology and water quality in relation to placement of structures within a 100-year flood hazard area. The project site is not located within a 100-year flood plain or other flood susceptible area.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Impact:

No Impact

Finding:

The project will result in no impacts to hydrology and water quality in relation to the failure of a levee or dam. No mitigation measures are required.

Rationale:

The project will result in no impacts to hydrology and water quality in relation to the failure of a levee or dam. The project site is not located within a 100- or 500-year floodplain. The project site is not located within a delineated potential inundation area resulting from the failure of a levee or dam, as shown by the City of Los Angeles Safety Element Inundation and Tsunami Hazard Areas map.

j) Inundation by seiche, tsunami, or mudflow?

Impact:

No Impact

Finding:

The project will result in no impacts to hydrology and water quality in relation to the inundation by seiche, tsunami, or mudflow. No mitigation measures are required.

Rationale:

The project will result in no impacts to hydrology and water quality in relation to the inundation by seiche, tsunami, or mudflow. The project site is not located within inundation and tsunami hazard areas delineated in the City of Los Angeles Safety Element.

II.10 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

Impact:

No Impact

Finding:

The project will result in no impacts to land use and planning through the physical division of an established community. No mitigation measures are required.

Rationale:

The project will result in no impacts to land use and planning through the physical division of an established community. The project entails the replacement of current short-term parking with a forecourt with outdoor seating, the reconfiguration of Alameda Street, widening of the crosswalk leading to the entrance to the El Pueblo Historic Park, and the closure of the north driveway entrance to LAUS. The nearest residential uses to the project are the Mozaic Apartments located adjacent to the project site on the southeast corner of East Cesar E Chavez Avenue and North Alameda Street. The project will provide an open space amenity and enhanced pedestrian and cycling path of travel for residents, workers, and visitors, including the transit population, in the project area. The improvements are aligned with the existing regional and local transportation network, which facilitates multi-modal movement through the neighborhood.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Impact:

No Impact

Finding:

The project will result in no impacts to land use and planning in relation to a conflict with adopted or land use plans, policies, or regulations. No mitigation measures are required.

Rationale:

The project will result in no impacts to land use and planning in relation to a conflict with adopted or land use plans, policies, or regulations.

SCAG 2016-2040 RTP/SCS

The project supports the RTP/SCS goal of integrating the transportation network and related strategies with an overall land use pattern by including elements that encourage pedestrian and alternative transportation access to LAUS, a regional transit hub. The project supports the overall land use development pattern encouraged by the SCS, and complements the transportation network that emphasizes system preservation, active transportation, and transportation demand management measures by redesigning the streetscape around LAUS to encourage more active transportation options.

City of Los Angeles

The project is consistent with the City of Los Angeles General Plan, zoning code, and Landscape Ordinance.¹⁷ The project is consistent with the types of open space, pedestrian, and landscape regulations that allow for the development of open space plazas. The project does not propose the construction of any buildings or structures. The project improvements are consistent with the Alameda District Specific Plan zoning and the Regional Center Commercial General Plan Land Use designation.

Mobility Plan 2035. The project is consistent with the goals and objectives outlined in the Mobility Plan 2035. The mobility plan aims to incorporate complete streets that provide safety, comfort, and convenience to all Angelenos including motorists, pedestrians, bicyclists, and users of public transportation. The project will decrease vehicle access lanes and increase accessibility for those Angelenos interested in all forms of active transportation.

Plan for a Healthy Los Angeles. The project is consistent with the objectives detailed in the Plan for a Healthy Los Angeles. The Plan for a Healthy Los Angeles includes policy on safe, active transportation improvements being foundational to healthy communities. Of those needs outlined in a vision of a healthy Los Angeles, a critical component is a community design that promotes healthy living for people of all ages, income levels, cultural backgrounds, and geographies. The project will allow for increased active transportation which is a healthier alternative to driving.

Central City Community Plan. The project helps to meet the Central City Community Plan objectives regarding the creation of new open space, and fostering physical and visual links between a variety of open spaces and public spaces Downtown by redesigning the streetscape around LAUS to encourage more active transportation, and to better link Union Station with El Pueblo. In addition, project includes the creation of a new public plaza at Union Station, further encouraging the addition of new open space Downtown.¹⁸

¹⁷ City of Los Angeles Landscape Ordinance. [1996] Amended 2005. Ordinance No. 170,978. Available at: http://cityplanning.lacity.org/Forms_Procedures/landsc%20guidelines%204-05.pdf

¹⁸ City of Los Angeles. Accessed 1 August 2017. Central City Community Plan, Objectives 4-1 through 4-4. Available at: <http://cityplanning.lacity.org/complan/pdf/CCYCPTXT.PDF>

Central City North Community Plan. The project supports and is consistent with the goals and policies of the CCNCP of maximizing the development opportunities of future transit systems while minimizing any adverse impacts; encouragement of local and express bus service, park-and-ride facilities, safe and attractive transit stops and programs aimed at enhancing the mobility of senior citizens, disabled persons, and transit-dependent populations; the provision of Transportation System Management (TSM) including strategies for limiting vehicle trip generation from new development; and requiring the installation of sidewalks with all new roadway construction and significant reconstruction of existing roadways.

ADP. The project is consistent with the intent of the ADP to provide continued and expanded development of the area as a major transit hub for the region by redesigning the streetscape to encourage enhanced pedestrian and active transportation access to LAUS. By developing a new public plaza, the project is consistent with the open space and pedestrian connectivity objectives in the ADP.

Vision Zero Los Angeles 2015-2025. The project is consistent with the mission of the Vision Zero Los Angeles 2015-2025 initiative. With the stated goal of zero traffic deaths by 2025, the project helps achieve this goal. By facilitating alternatives to driving, enhancing the safety and quality of pedestrian and bicycle connections around LAUSD, narrowing the roadway and reallocating roadway area for the expanded pedestrian and bicycling lanes, the project is aligned with the goals of Vision Zero Los Angeles 2015-2025. The Vision Zero priorities safety improvements on the High Injury Network, corridors where strategic investments will have the biggest impact in reducing deaths and severe injuries. Alameda Street, within the project site, is located on the High Injury Network.

Project Restore Civic Crossroads Plan. The project is consistent with the Project Restore Civic Crossroads Plan as it will encourage revival of a vibrant, pedestrian-friendly neighborhood with linked public spaces for the El Pueblo area.

The Connect US Action Plan. The project is consistent with the Connect US Action Plan as it will create safe and intuitive connections between LAUS and the cultural/historic sites in the surrounding neighborhoods, improve bicycle and pedestrian access across all transit systems, improve regional connectivity to bus services, expand the network of bus services and dedicated bus facilities, improve regional connectivity to bus services, create and maintain an interconnected and effective bicycle network, and incorporate safety for pedestrians into all street designs and redesign.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Impact:

No Impact

Finding:

The project will result in no impacts to land use and planning in relation to a conflict with any applicable HCP or NCCP. No mitigation measures are required.

Rationale:

The project will result in no impacts to land use and planning in relation to a conflict with any applicable HCP or NCCP. The project is located in a heavily urbanized area, and there are no HCPs or NCCPs with boundaries that intersect the project site.

II.11 MINERAL RESOURCES

Would the project:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

Impact:

No Impact

Finding:

The project will result in no impacts to mineral resources in relation to the loss of availability of a known mineral resource of statewide or regional importance. No mitigation measures are required.

Rationale:

The project will result in no impacts to mineral resources in relation to the loss of availability of a known mineral resource of statewide or regional importance. Based on a review of California Geological Survey (CGS),¹⁹ there are no mineral resources of statewide importance designated in the project area. There are no designated active or abandoned mine sites within the project site. There are no active or abandoned oil fields or extraction facilities on the project site.^{20,21} The project site is zoned regional commercial and heavy industrial, and the project site has been developed with structures and is inaccessible for mining extraction.

- b) **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

Impact:

No Impact

¹⁹ California Department of Conservation, Division of Oil, Gas & Geothermal Resources. Accessed 27 April 2016. Website. Available at: <http://www.conservation.ca.gov/dog/Pages/Wellfinder.aspx>

²⁰ U.S. Geological Survey. Accessed 26 April 2016. Mineral Resources On-line Spatial Database. Available at: <http://mrdata.usgs.gov/mineral-resources/active-mines.html>

²¹ California Department of Conservation, Abandoned Mine Lands Unit. Accessed 26 April 2016. Website. Available at: http://www.conservation.ca.gov/omr/abandoned_mine_lands

Finding:

The project will result in no impacts to mineral resources in relation to the loss of availability of a known mineral resource of statewide or regional importance. No mitigation measures are required.

Rationale:

The project will result in no impacts to mineral resources in relation to the loss of availability of a known mineral resource recovery site. Based on a review of the Conservation Element of the City of Los Angeles General Plan,²² there are no known mineral resource recovery sites of local importance located within the project site. The project site does not lie within a designated Mineral Resource Zone—2 (MRZ-2). MRZ-3 designation does not include known significant mineral resources and is not included in the resource management provisions under the Conservation Element of the City of Los Angeles General Plan. The project requires grading and reconfiguration of existing roadways, sidewalks, hardscape, and landscape in the forecourt of LAUS and surrounding areas. These improvements will not improve or decrease access to mineral resources of undetermined significance in the underlying MRZ-3 zone which is inaccessible in the existing condition, and will continue to be inaccessible after construction of the project. Project construction is expected to utilize construction aggregate resources from the nearest sand and gravel mine in proximity to the project site. All grading will be balanced within the property limits without the need for import or export from the site.

II.12 NOISE

Would the project result in:

- a) **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to noise related to exposure or generation of noise levels in excess of established standards. No mitigation measures are required.

Rationale:

The project will result in less than significant impacts to noise related to exposure or generation of noise levels in excess of established standards. During construction of the project, sensitive receptors will be exposed to noise levels above the thresholds set forth in the City’s CEQA Threshold Guide, which states that a project will have a significant impact on noise levels from construction if construction activities lasting more than 10 days in a 3-month period will exceed existing ambient exterior noise levels by 5

²² City of Los Angeles Department of City Planning. Adopted September 2001. Los Angeles General Plan, Conservation Element.

dBa or more at a sensitive receptor.²³ However, with the incorporation of project design features and BMPs as specified above, construction and operation of the project will result in less than significant impacts from noise in relation to exposure or generation of noise levels in excess of established standards. The project will not exceed the thresholds set forth in the City's CEQA Threshold Guide and thus will be in compliance with the City's noise regulation.

Construction

There will be temporary increases during construction of the project including the construction of a small transit-serving building located at the northern end of the forecourt. During each phase of construction the noise level will have the potential to exceed the City of Los Angeles day time noise level 75 dBA at any given hour during day time construction (see the Noise and Vibration Technical Report, which is Appendix G to the EIR). Project design features and BMPs consistent with the City of Los Angeles Municipal Code requirements articulated in Section 112.05 and Section 41.40²⁴ will be implemented to reduce the temporary increase in noise levels from construction of the project to less than significant levels. The use of temporary noise mufflers barriers and blankets will reduce noise levels for construction equipment by up to 15 dBA²⁵

Operation

The average daytime noise level for the 5 monitoring locations was 69 dBA (Leq) (see Appendix G to the EIR, *Noise and Vibration Technical Report*). The average nighttime noise level for the five monitoring locations was 70 dBA (Leq). The existing ambient noise levels at all monitoring locations currently exceed the City's presumed daytime ambient noise standard of 60 dBA (Leq) by an average of 9.5 dBA (Leq). The existing environment has noise levels consistent with high traffic volumes that will produce noise levels in the upper 60s and low 70s dBA range. However, the project improvements will not result in additional traffic on nearby local access roads to LAUS. Further, some of the improvements result in road closures and reduced lanes that will reduce noise levels within the project area.

Maintenance

Maintenance activities that include the use of landscaping equipment such as street sweepers and electric leaf blowers are comparable to the existing ambient noise conditions and will include maintenance of the small transit-serving building. Low-maintenance landscaping features will be used and, therefore, will not increase noise levels substantially over the existing conditions.

²³ City of Los Angeles. 2006. *L.A. CEQA Thresholds Guide*. Prepared by: Environmental Affairs Commission and the Environmental Affairs Department. Los Angeles, CA.

²⁴ City of Los Angeles Municipal Code. Available at: http://www.amlegal.com/codes/client/los-angeles_ca/

²⁵ U.S. Environmental Protection Agency. 1971. *Noise from Construction Equipment and Operation, Building Equipment and Home Appliances*. PB 206717. Washington, DC.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Impact:

No Impact

Finding:

The project will result in no impacts to noise in relation to generation of excessive ground-borne vibration or ground-borne noise. No mitigation measures are required.

Rationale:

The project will result in no impacts to noise in relation to generation of excessive ground-borne vibration or ground-borne noise. As a result of the construction, operation, and maintenance of the project, no groundborne vibration will occur. The project will reduce the number of travel lanes and will not add capacity to existing roadways. Groundborne vibration from vehicular traffic rarely causes a disturbance within buildings located in urban environments unless the pavement surface is uneven or the receptor is highly sensitive (e.g., a scientific research establishment) to groundborne vibration.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to noise in relation to permanent increases in ambient noise levels as a result of operation and maintenance of the project. No mitigation measures are required.

Rationale:

The project will result in less than significant impacts to noise in relation to permanent increases in ambient noise levels as a result of operation and maintenance of the project. The operation of the project will not increase noise over existing exterior levels within in the project area. The project improvements will not add additional traffic on nearby local access roads to LAUS. Nearby buildings will not experience a change in noise levels during the operation of the project. The existing nighttime ambient noise levels at the five monitoring locations ranged from 65.9 dBA (Leq) at monitoring location ST-4 to 72.7 dBA (Leq) at monitoring location ST-2 (see Appendix G to the EIR, *Noise and Vibration Technical Report*). The average daytime noise level for the five monitoring locations was 69 dBA (Leq). The average nighttime noise level for the five monitoring locations was 70 dBA (Leq). The existing ambient noise levels at all monitoring locations currently exceed the City's presumed daytime ambient noise standard of 60 dBA (Leq) by an average of 9.5 dBA (Leq). Cycling, walking, and conversational noise consistent with forecourt and esplanade uses normally generate minimal noise levels of

approximately 55 dBA (Leq) as identified by the EPA for certain outdoor uses.²⁶ Project elements, which include water features such as a splash pad, and a small transit-serving building, will be consistent with the existing pedestrian conversation noise, and ambient noise levels experienced within the project area. Outdoor activities can range in noise levels of 75 dBA to 80 dBA. Therefore, the project will result in less than significant impacts to noise in relation to permanent increases in ambient noise levels as a result of operation and maintenance of the project, and no mitigation will be required.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Impact:

Less than Significant

Finding:

The project will result in less than significant impacts to noise related to temporary or periodic increases in ambient noise levels from the project. No mitigation measures are required.

Rationale:

Construction

The project will result in less than significant impacts to noise related to temporary or periodic increases in ambient noise levels from the project. The construction of the project will require four phases of construction: demolition, site preparation, grading and paving (including striping/new configuration on Alameda and Los Angeles Streets) and includes the construction of a small transit-serving building located at the northern end of the forecourt. The closest receptors are the Mozaic Apartments, La Petite Academy, and La Plaza Park, which are within 50 feet of where construction and maintenance will occur. Noise will be produced by the operation of heavy-duty equipment. During each phase of construction the noise level will have the potential to exceed the City of Los Angeles day time noise level 75 dBA at any given hour during day time construction (see Appendix G to the EIR, *Noise and Vibration Technical Report*). Project design features and BMPs consistent with the City of Los Angeles Municipal Code requirements articulated in Section 112.05 and Section 41.40²⁷ will be implemented to reduce the temporary increase in noise levels from construction of the project to less than significant levels. The use of temporary noise mufflers barriers and blankets will reduce noise levels for construction equipment by up to 15 dBA²⁸ Maintenance activities which include the use of landscaping equipment such as street sweepers and electric leaf blowers including maintenance of the small transit-serving building are comparable to the existing ambient noise conditions. Low maintenance landscaping features will be used and therefore, will not increase noise levels substantially over the existing conditions.

²⁶ US Environmental Protection Agency. EPA Identifies Noise Levels Affecting Health and Welfare. Available at: <https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html>

²⁷ City of Los Angeles Municipal Code. Available at: http://www.amlegal.com/codes/client/los-angeles_ca/

²⁸ U.S. Environmental Protection Agency. 1971. Noise from Construction Equipment and Operation, Building Equipment and Home Appliances. PB 206717. Washington, DC.

Operation

Impacts to noise related to temporary or periodic increases in ambient noise levels from the project will be less than significant in regards to operational noise. The average daytime noise level for the five monitoring locations was 69 dBA (Leq) (see Appendix G to the EIR, *Noise and Vibration Technical Report*). The average nighttime noise level for the five monitoring locations was 70 dBA (Leq). The existing ambient noise levels at all monitoring locations currently exceed the City's presumed daytime ambient noise standard of 60 dBA (Leq) by an average of 9.5 dBA (Leq). The existing environment has noise levels consistent with high traffic volumes that will produce noise levels in the upper 60s and low 70s dBA range. However, the project improvements will not result in additional traffic on nearby local access roads to LAUS. Further, some of the improvements result in road closures and reduced lanes that will reduce noise levels within the project area. Cycling, walking, and conversational noise consistent with forecourt and esplanade uses normally generate minimal noise levels of approximately 55 dBA (Leq) as identified by the EPA for certain outdoor.²⁹ Project elements, which include water features such as a splash pad, and a small transit-serving building, will be consistent with the existing pedestrian conversation noise, and ambient noise levels experienced within the project area. Outdoor activities can range in noise levels of 75 dBA to 80 dBA (Appendix G). Therefore, the operation of the project will result in less than significant impacts to noise in relation to exposure or generation of noise levels in excess of established standards, and mitigation measures will not be required.

As shown in Appendix G, the paving phase of project construction will generate the highest levels of noise. This is due in large part to the operation of heavy equipment, though it should be noted that only a limited amount of equipment will be operating near a given location at a particular time. Construction noise levels could periodically reach approximately 77 to 89 dBA at a distance of 50 feet from the project site. As stated above, a project will have a significant impact on noise levels from construction if construction activities lasting more than 10 days in a 3-month period will exceed existing ambient exterior noise levels by 5 dBA or more at a sensitive receptor. Therefore, construction activities will result in a significant impact if noise levels exceed 74.5 dBA at a sensitive receptor.³⁰

Project design features and BMPs consistent with the City of Los Angeles Municipal Code requirements articulated in Section 112.05 and Section 41.40³¹ will be implemented to reduce the temporary increase in noise levels from construction of the project to less than significant levels. The use of temporary noise mufflers barriers and blankets will reduce noise levels for construction equipment by up to 15 dBA.³²

²⁹ US Environmental Protection Agency. EPA Identifies Noise Levels Affecting Health and Welfare. Available at: <https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html>

³⁰ Average ambient noise level at project site (69.5 dBA) + Significance Threshold Allowance (5 dBA) = 74.5 dBA.

³¹ City of Los Angeles Municipal Code. Available at: http://www.amlegal.com/codes/client/los-angeles_ca/

³² U.S. Environmental Protection Agency. 1971. Noise from Construction Equipment and Operation, Building Equipment and Home Appliances. PB 206717. Washington, DC.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed project expose people residing or working in the proposed project area to excessive noise levels?

Impact:

No Impact

Finding:

The project will result in no impacts to noise in relation to public airports. No mitigation measures are required.

Rationale:

The project will result in no impacts to noise in relation to public airports. The project area is outside of the Los Angeles International Airport (LAX) airport noise contour (see Section 4.2.3 and 3.9 of the EIR).

- f) For a project within the vicinity of a private airstrip, would the proposed project expose people residing or working in the proposed project area to excessive noise levels?

Impact:

No Impact

Finding:

The project will result in no impacts to noise in relation to private airstrips. No mitigation measures are required.

Rationale:

The project will result in no impacts to noise in relation to private airstrips. The project site is not located within the vicinity of a private airstrip.

II.13 POPULATION AND HOUSING

Would the project:

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

Impact:

No Impact

Finding:

The project will result in no impacts to population and housing in regard to inducing substantial population growth in an area, either directly or indirectly. No mitigation measures are required.

Rationale:

The project will result in no impacts to population and housing in regard to inducing substantial population growth in an area, either directly or indirectly. The project is intended to serve existing and anticipated residents, workers, visitors, and the transit population. The project will result in no direct impacts in regard to population growth because it will not involve the construction of new housing units or businesses, and because it is limited to landscape improvements and the creation of public open space and pedestrian and cycling improvements. Although these improvements will improve the convenience of accessing transit facilities at LAUS from the project vicinity, they are not major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) which will make accessible a previously inaccessible area to support population growth.³³

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Impact:

No Impact

Finding:

The project will result in no impact to population and housing in regard to displacing substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere. No mitigation measures are required.

Rationale:

The project will result in no impact to population and housing in regard to displacing substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere. There is no housing within the project site. No housing units will be removed due to the project.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Impact:

No Impact

³³ City of Los Angeles. 2006. *L.A. CEQA Thresholds Guide*. Available at: <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>

Finding:

The project will result in no impacts to population and housing related to the displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. No mitigation measures are required.

Rationale:

The project will result in no impacts to population and housing related to the displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. There are no authorized permanent encampments within the project site, which is entirely composed of existing developed parking, roads, sidewalks, and landscaped areas. A few temporary encampments were observed during site reconnaissance along Arcadia Street adjacent to the project site and on a few of the freeway bridges crossing State Route 101 (SR-101) to the south of the project site. However, because these are unauthorized encampments, those individuals could be asked to leave whether or not the project is developed. During site reconnaissance, the project site was not being utilized for temporary encampments. The project will not directly displace people as there is no permanent population residing within the project site.

II.14 PUBLIC SERVICES

a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

i) **Fire protection?**

Impact:

No Impact

Finding:

The project will result in no impacts to public services related to fire protection. No mitigation measures are required.

Rationale:

The project will result in no impacts to public services related to fire protection. A significant impact will occur if the project required the construction of City of Los Angeles Fire Department (LAFD) facilities to provide an engine company or truck company to serve the project site. The Los Angeles Municipal Code Section 57.512.1, *Response Distance*, establishes a maximum response distance from a fire station for a high-density commercial area (Principal Business Districts or Centers) of 3/4 mile and 1 mile to an engine

company.³⁴ Consistent with the maximum response distance articulated in the City General Plan of 1 mile to an engine company or 1.5 miles to a truck company,³⁵ primary response to the project site will be provided by LAFD Fire Station No. 4, located 0.1 mile north of the project site.

The project is intended to serve existing and anticipated residents, workers, visitors, and transit population. The project site is located in an urban area with little vegetation, and will not be affected by wildfires. Potential urban fires will be addressed through applicable building codes, a fire protection and suppression system³⁶ such as fire hydrants, fire escape assemblies, automatic sprinkler systems, and a fire alarm system that will notify local fire department of fires. A construction traffic management plan will be developed to reduce potential project construction impacts on the delivery of fire protection services. The construction traffic management plan will outline adequate measures to ensure emergency vehicle access during all aspects of project construction. No reduction of Fire Department personnel, equipment, or apparatus access, fire lanes, or fire hydrants in or near the project site will take place due to the construction and operation of the project. Fire lanes located within the project site will be designated and designed for fire and emergency team access pursuant to Section 503.1.4 of the Los Angeles Fire Code. The project site includes fire and emergency access, fire lanes, and hydrants in the required locations as described in the Los Angeles Fire Code, Safety Element of the City of Los Angeles General Plan, and Alameda District Specific Plan.^{37,38,39} LAFD access and minimum requirements for supplemental fire protection based on Fire Department response time capabilities, personnel, apparatus availability, and fire-flow will be designed consistent with the Los Angeles Fire Code as described in Chapter 5, *Fires Service Features*.⁴⁰ Active patrol of illegal loading, stopping, and parking in fire and emergency access lanes in the project site is performed regularly so that Fire Department vehicles or emergency vehicles are not prevented from gaining access during a fire or emergency situation.⁴¹

ii) Police protection?

Impact:

No Impact

³⁴ American Legal Publishing Corporation. Los Angeles Municipal Code. *Chapter V, Article 7, Section 57.512.1. Response Distance* Available online at: http://www.amlegal.com/codes/client/los-angeles_ca/

³⁵ City of Los Angeles Department of City Planning. n.d. Safety Element of the Los Angeles General Plan. Available at: http://planning.lacity.org/GP_elements.html

³⁶ Los Angeles Fire Department. n.d. CHIEF'S REGULATION 4. Available at: <http://www.lafd.org/fire-prevention/chiefs-regulation-4>

³⁷ CALIFORNIA FIRE CODE – Los Angeles Fire Code, CHAPTER 5 – FIRE SERVICE FEATURES. Available at: http://codes.iccsafe.org/app/book/toc/2014/2014_LA_City_Fire/index.html

³⁸ City of Los Angeles Department of City Planning. n.d. Service Systems Element of the Los Angeles General Plan. Available at: http://planning.lacity.org/GP_elements.html

³⁹ Alameda District Specific Plan. Effective June 18, 1996. Available at: <http://planning.lacity.org/complan/specplan/pdf/ALAMEDA.PDF>.

⁴⁰ CALIFORNIA FIRE CODE – Los Angeles Fire Code, CHAPTER 5 – FIRE SERVICE FEATURES. Available at: http://codes.iccsafe.org/app/book/toc/2014/2014_LA_City_Fire/index.html

⁴¹ Sapphos Environmental, Inc. Site Visit and Field Investigation Notes, Laura Male, February 9, 2017.

Finding:

The project will result in no impacts on public services related to police protection. No mitigation measures are required.

Rationale:

The project will result in no impacts on public services related to police protection. The project area is served by police protective services at a level consistent with the applicable goals, policies, and standards relate to police protection. In addition to standard City of Los Angeles Police Department (LAPD) requirements, a number of crime prevention and security design features will be implemented to address police issues consistent with the Safety Element of the City of Los Angeles General Plan and Alameda District Specific Plan. Incorporation of a construction traffic management plan will be developed to reduce potential project construction impacts on the delivery of police services. The construction traffic management plan will outline adequate measures to ensure emergency vehicle access during all aspects of project construction. City review of street widths, street lighting, and street signage will be consistent with requirements for the provision of emergency access, and will ensure access is maintained. These project design features will include recommendations included in the LAPD's Design Out Crime Guidelines.^{42,43}

As described in the project description, the project has been designed to incorporate security provisions and features pursuant to the City of Los Angeles General Plan including lighting near the forecourt, security to mitigate for any increased security risks due to additional foot traffic, controlled access to buildings, and illumination of public and semipublic spaces to minimize opportunities for criminal activity, thereby reducing the demands placed upon police protection services. The project is intended to serve existing and anticipated residents, workers, visitors, and transit population. The service ratio of 10 sworn officers per 1,000 residents for the Central Area Community Police Station service area consistent with the provisions established in the security element of the City of Los Angeles General Plan and Alameda District Specific Plan and will not warrant the construction of a new Police Station or Substation.

iii) Schools?**Impact:**

No Impact

Finding:

The project will result in no impacts to public services in relation to schools. No mitigation measures are required.

⁴² City of Los Angeles, Crime Prevention Through Environmental Design: Design Out Crime Guidelines, 1997.

⁴³ http://www.lapdonline.org/crime_prevention/content_basic_view/8852#1

Rationale:

The project will result in no impacts to public services in relation to schools. The project is a nonresidential use and will therefore not directly generate school-age children. The project will not result in population growth and does not involve the construction of new housing units or businesses. The project is intended to serve existing and anticipated residents, workers, visitors, and transit population. The project is expected to accommodate the transportation demand anticipated from the existing and projected population and employment by providing an improved walkability index,⁴⁴ increased bicycle parking capacity, and additional transit ridership in the project area. The project site is served by educational facilities consistent with the provisions established in the City of Los Angeles General Plan, Central City CPA, and Central City North CPA and will not warrant the construction of a new or expanded educational facilities.

iv) Parks?

Impact:

No Impact

Finding:

The project will result in no impacts to public services in relation to parks. No mitigation measures are required.

Rationale:

The project will result in no impacts to public services in relation to parks. There are approximately 194.1 acres of local parkland within the service area radius of the project site. The nearest regional park is Elysian Park, an approximately 576.1-acre park located approximately 0.6 mile north of the project site at 835 Academy Road, Los Angeles, California 90012. Based on the City's standard of 5 to 15 acres for neighborhood parks, there is one neighborhood park located within a 0.5-mile service area radius of the project site: Grand Park, an approximately 9.3-acre park managed by the County of Los Angeles that is located approximately 0.3 mile west of the project site. Based on the City's standard of 15 to 50 acres for community parks, there are six community parks (totaling 178.4 acres) within a 2-mile service area radius of the project site.

The project is a nonresidential use. The project will not result in population growth and does not involve the construction of new housing units or businesses. The project is intended to serve existing and anticipated residents, workers, visitors, and transit population. The project will result in no impacts in regard to including recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. There is no existing recreation use within the project site. The project includes the construction of a new civic plaza,

⁴⁴ Los Angeles Department of City Planning. June 2013. *Health Atlas for the City of Los Angeles*. "Map 53: Walkability Index (2012)." Map available at: <http://planning.lacity.org/cwd/framwk/healthwellness/Maps/53.pdf> Main document available at: <http://healthyplan.la/wordpress/wp-content/uploads/2013/10/Health-Atlas-for-the-City-of-Los-Angeles-July-2013-FINAL-SMALL.pdf>

including installation of fountains, within the footprint of the existing short-term parking lot within the project site. The site is already developed and heavily graded.

v) Other public facilities?

Impact:

No Impact

Finding:

The project will result in no impacts to public services in relation to other public facilities, such as libraries and hospitals. No mitigation measures are required.

Rationale:

The project will result in no impacts to public services in relation to other public facilities, such as libraries and hospitals. The Los Angeles City Public Library provides library services within the Central City North CPA. There are three libraries within a 1-mile radius of the project site. The closest library serving the Central City North CPA is the Los Angeles Public Library – Chinatown Branch located at 639 N. Hill Street. The nearest hospital to the project site is White Memorial Medical Center, a 353-bed not-for-profit, faith-based, teaching hospital located at 1720 East Cesar E Chavez Avenue, located approximately 1.2 miles east-southeast of the project site.⁴⁵

The project is a nonresidential use. The project will not result in population growth and does not involve the construction of new housing units or businesses. The project is intended to serve existing and anticipated residents, workers, visitors, and transit population. As such, the project will not directly generate any substantial new demand for public facilities such as libraries or hospitals.

II.15 RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact:

No Impact

Finding:

The project will result in no impacts in regard to increasing the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated. No mitigation measures are required.

⁴⁵ Adventist Health. Accessed 6 May 2016. White Memorial Medical Center. Available at: <https://www.adventisthealth.org/white-memorial/pages/default.aspx>

Rationale:

The project will result in no impacts in regard to increasing the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated. The project will result in a net increase in a publicly accessible civic space. The creation of a civic space results from decommissioning of parking and a single lane of traffic (for example, creating a new forecourt area with an outdoor seating area, a new esplanade along Alameda Street, and expanding sidewalks on both sides of Alameda Street into the roadway and creating a shared tree-lined multi-use path for both bicyclists and pedestrians on the east side of Alameda Street). Consistent with the goals of the Southern California Association of Governments 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, the project will provide amenities to serve existing and projected multi-modal transit users, cyclists, and pedestrians. The project will not increase the number of residents or workers in the area.

Metro Art has integrated a diverse range of site-specific artworks into the growing Metro system, improving the quality of transit environments and creating a sense of place. From photography installations to onboard posters, art tours and live performances, sculptures and murals, this multifaceted approach adds vibrancy to L.A.'s communities. Examples of site-specific artworks integrated into LAUS include iconic murals, mosaics, sculptural seating, grillwork fencing, multimedia works and the creation of two gallery spaces dedicated to rotating displays. In addition, for the past 5 years, Metro Art Presents has provided frequent free cultural events at Historic Union Station featuring a range of collaborations with artists and arts organizations, including: film screenings; poetry readings; and live music and dance performances by jazz, swing, salsa and folk bands. These recreational opportunities have been enjoyed by thousands of residents and visitors. It is anticipated that cultural programming will be extended into the project once constructed, and will further position LAUS as a world-class (arts and cultural) destination providing an exceptional passenger experience at the center of Metro's expanding transit system. Therefore, rather than increasing the burden on surrounding facilities, it will increase available public spaces and thus reduce the burden on existing neighborhood and regional parks.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact:

No Impact

Finding:

The project will result in no impacts in regard to including recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No mitigation measures are required.

Rationale:

The project will result in no impacts in regard to including recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the

environment. There is no existing recreation use within the project site. The project includes the construction of a new forecourt area, including installation of a water feature, within the footprint of the existing short-term parking lot within the project site.

II.16 TRANSPORTATION AND TRAFFIC

Would the project:

- a) **Would the project result in a substantial disruption to traffic during construction, which could include temporary street closures; temporary loss of regular vehicular or pedestrian access to existing land uses; temporary loss of an existing bus stop or rerouting of bus lines; or creation of traffic hazards?**

Impact:

No Impact

Finding:

No significant impacts are expected to occur based on these criteria. No mitigation measures are required.

Rationale:

No significant impacts are expected to occur based on these criteria. Construction of the project would begin after design is completed and would continue for approximately 7 months. Construction would take place over four phases:

1. Demolition, including removal of the parking lot and affected trees
2. Site preparation
3. Grading
4. Paving, including restriping and new lane configurations

During each of these phases new off-site trips would be generated by construction workers, large trucks hauling soil and debris from the site, trucks delivering construction equipment to/from the site (such as bulldozers, excavators and other large items of machinery), and large trucks delivering concrete and other construction materials. This would include the construction of a small transit-serving building on the northern portion of the project area boundary. The LAMC provides that construction activities are limited to the hours from 7:00 AM to 9:00 PM on weekdays and from 8:00 AM to 6:00 PM on Saturdays and holidays. No construction is permitted on Sundays. During the demolition phase, a total of 22 daily round trips are anticipated across all construction trip types. Construction workers are expected to represent most of the construction-related traffic. Because construction works often travel outside of typical commute hours, these trips are expected to have a negligible effect on intersection operating conditions in the study area. Construction worker parking will occur on-site in locations with available parking supply, such as the One Gateway garage.

The City of Los Angeles Department of Transportation (LADOT) generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient,

construction-related traffic effects are temporary. LADOT requires implementation of a construction-period traffic management plan, including worksite traffic control plans where work would occur within the public right-of-way, to ensure that any construction-related effects are minimized to the greatest extent possible.

At times during the construction of the proposed project, the delivery of materials and equipment could create impacts on the adjacent roadway network based on the following considerations:

- There may be intermittent periods when large numbers of material deliveries are required, such as when concrete trucks will be needed for the new esplanade.
- Some of the materials and equipment could require the use of large trucks (18-wheelers), which could create additional congestion on the adjacent roadways.
- Delivery vehicles may need to park temporarily on adjacent roadways such as Los Angeles Street and Arcadia Street as they deliver their items.

Potential impacts associated with construction of the project, e.g., partial lane closures, would be limited to those locations within or immediately adjacent to the project site. Segments of Alameda Street, Los Angeles Street, and Arcadia Street would have short-term impacts at locations where curb cuts, curb landscaping, etc. are installed. Temporary lane closures and, potentially, temporary sidewalk closures along portions of the perimeter of the project site may occur, but some level of pedestrian and bicycle access around the site will be adequately maintained during construction.

A construction traffic management plan, including street closure information, detour plans, haul routes, and staging plans should be prepared and submitted to LADOT for review and approval prior to the start of any construction work. This plan would include such elements as the designation of haul routes for construction-related trucks, the location of access to the construction site, any driveway turning movement restrictions, temporary traffic control devices or flagmen, travel time restrictions (if any) for construction-related traffic to avoid peak travel periods on selected roadways, consolidating construction truck deliveries, and designated staging and parking areas for equipment and workers. If oversized vehicles or loads are to be transported over State highways, a permit would be required from Caltrans.

As most construction activities will occur within a public street right-of-way, the following construction management standard practices will be implemented:

- A site-specific construction worksite traffic control plan should be prepared and submitted to LADOT for review and approval prior to the start of any construction work within the public right-of-way. This plan shall include such elements as the location of any lane closures, restricted hours during which lane closures (if any) would not be allowed, local traffic detours (if any), protective devices and traffic controls (such as barricades, cones, flag persons, lights, warning beacons, temporary traffic signals, warning signs), access limitations for abutting properties (if any), and provisions to maintain emergency access through construction work areas.
- Provide safety precautions for pedestrians and bicyclists with measures such as protection barriers and signage indicating alternative pedestrian and bicycle access routes where existing facilities would be affected.

- Provide advance notice of planned construction activities to any affected residents, businesses, and property owners in the vicinity of the construction site.
- Coordinate with emergency service providers (police, fire, ambulance and paramedic services) to provide advance notice of ongoing construction activity and construction hours.
- Coordinate with public transit providers (Metro, LADOT DASH, etc.) to provide advance notice of ongoing construction, construction hours. Determine bus stops that would be affected by construction and appropriate bus stop relocation.

Based on the implementation of the construction management measures provided in Section 3.17, *Transportation and Traffic*, and Section 4.2.3, *Alternative 3*, of the EIR, the project will not result in a substantial disruption during the construction phase, and so no significant impact would occur.

c) Would the proposed project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Impact:

No Impact

Finding:

No significant impacts are expected to occur based on these criteria. No mitigation measures are required.

Rationale:

Regional Traffic Impact Analysis

The Congestion Management Plan (CMP) guidelines require that the first issue to be addressed is the determination of the geographic scope of the study area. The criteria for determining the study area for CMP arterial monitoring intersections and for freeway monitoring locations are:

- All CMP arterial monitoring intersections where the proposed project will add 50 or more trips during either the AM or PM peak hours of adjacent street traffic.
- All CMP mainline freeway monitoring locations where the proposed project will add 150 or more trips, in either direction, during either the AM or PM peak hours.

The closest CMP arterial monitoring station to the project site is at Alameda Street & Washington Boulevard located approximately three miles south of the project. Because the project is not expected to generate any trips, no further CMP arterial analysis is required.

Regional access to the project site is provided by US-101 immediately south of the project, I-5 approximately 1.5 miles to the east, and SR-110 approximately one mile to the north and west. The CMP freeway monitoring stations closest to the project site on US-101 is north of Vignes Street, on I-5 is at

Stadium Way and on I-10 at the eastern City of Los Angeles limits. Because the project is not expected to generate any trips, no further CMP freeway analysis is required

Regional Transit Impact Analysis

Potential increases in transit person trips generated by a project are typically estimated using the methodology outlined in Appendix D of the 2010 CMP, which recommends estimating the number of transit trips expected to result from a proposed project based on the projected number of vehicle trips and an average vehicle ridership (AVR), and then provides guidance regarding the percentage of person trips assigned to public transit depending on the land use type and the proximity to transit services. As this project will not generate new vehicle trips, under the methodology outlined in the CMP it will also not generate new transit trips, and so would not have an impact on transit. The project would also not materially affect transit travel time in the study area.

Based on the impact criteria above, the project is not expected to have any significant impacts.

d) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Impact:

No Impacts

Finding:

The project will have no effect on air traffic patterns. No mitigation measures are required.

Rationale:

The project will have no effect on air traffic patterns.

e) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact:

No impact

Finding:

The project will enhance safety as a result of the project's design features. No mitigation measures are required.

Rationale:

The project will enhance safety by widening sidewalks to accommodate pedestrians and cyclists, narrow pedestrian crossings, improving pedestrian and cyclist visibility in a high-visibility raised crosswalk, and

will slow vehicle travel speeds via the lane repurposing on Alameda Street. Therefore, the project will enhance safety as a result of the project's design features.

f) Result in inadequate emergency access?

Impact:

No Impact

Finding:

The project will retain access to the station on Alameda Street, and will not affect any other access locations, so is not expected to impact emergency access to the station site. No mitigation measures are required.

Rationale:

The project will retain access to the station on Alameda Street, and will not affect any other access locations, so is not expected to impact emergency access to the station site.

The Los Angeles Fire Department (LAFD) in collaboration with LADOT has developed a Fire Pre-emption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets in the City. The City of Los Angeles has over 205 miles of routes equipped with FPS.

While the project would impact intersection level of service in the study area, there is not a direct relationship between predicted travel delay and response times as California state law does require drivers to yield the right-of-way to emergency vehicles and even permits emergency vehicles to use opposing lane of travel, the center turn lanes, or bus-only lanes. Emergency responders also routinely use the center left-turn lanes, or even travel in opposing travel lanes if needed. Generally, multi-lane roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle.

g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Impact:

No Impact

Finding:

The proposed project is consistent with the Mobility Plan 2035 network, the ConnectUS Action Plan, and other non-adopted but relevant plans, like the Los Angeles Union Station Master Plan (USMP). No mitigation measures are required.

Rationale:

The proposed project is consistent with the Mobility Plan 2035 network, the ConnectUS Action Plan, and other non-adopted but relevant plans, like the USMP. The proposed project will substantially enhance the safety and capacity of bicycle and pedestrian facilities around the station, and is therefore expected to have a positive impact on these facilities. The existing unidirectional buffered bike lanes on Los Angeles Street would be consolidated in an off-street bicycle path in the expanded El Pueblo plaza area, near the west side of Los Angeles Street (contingent on Caltrans approval). This facility would run north from the pedestrian crossing adjacent to El Pueblo, to the Alameda Street crossing. and a bicycle crossing would be added to provide direct bike access from the station to that facility.

II.17 UTILITIES AND SERVICE SYSTEMS

Would the project:

- a) **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

Impact:

No Impact

Finding:

The project will result in no impacts to utilities and service systems in relation to exceeding wastewater treatment requirements of the Los Angeles RWQCB. No mitigation measures are required.

Rationale:

The project will result in no impacts in regard to exceeding wastewater treatment requirements of the Los Angeles RWQCB. The wastewater generated from the project will be from bathrooms should they be constructed in relation to the small transit serving building. The wastewater will be serviced by the Hyperion Treatment Plant (HTP), which is located approximately 14 miles to the west of the project site at 12000 Vista Del Mar, Los Angeles, California 90293. HTP has a design capacity of 450 million gallons per day (mgd) and currently treats an average of 275 mgd to primary and secondary treatment standards, using three levels of filtration treatment before discharging the treated wastewater 5 miles offshore with significant excess capacity. Most of the effluent from HTP is discharged into the Santa Monica Bay through a 5-mile ocean outfall, while approximately 50 mgd of secondary effluent is recycled on-site or transported to the West Basin Municipal Water District Water Recycling Plant for use by local industries. Further, the makeup and composition of the wastewater will not change that will entail changing wastewater processes at HTP.

The project will not increase population and will not induce population growth and any accompanying wastewater flow increases in the area, either directly or indirectly. The project is intended to serve existing and anticipated residents, workers, visitors, and the transit population. The project will result in no direct impacts in regard to population growth because it will not involve the construction of new housing units or businesses. The project will result in no indirect impacts in regard to population growth because it is limited to landscape improvements and the creation of public open space and pedestrian

and cycling improvements. Although these improvements will improve the convenience of accessing transit facilities at LAUS from the project vicinity, they are not major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) which will make accessible a previously inaccessible area to support population growth and accompanying wastewater increases. The project will develop a small transit-serving building, which may include one restroom with a water efficient commercial toilet (1.28 gallons per flush), and a water efficient commercial urinal (0.125 gallons per flush).⁴⁶ The restroom is anticipated to generate on average 2,559 gallons per year (gpy) of waste water (commercial efficient toilet: 1,974 gpy; commercial efficient urinal: 585 gpy).⁴⁷ The HTP has more than adequate treatment capacity to meet the treatment requirements from the wastewater generated from the restroom in the small transit-serving building.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Impact:

No Impact

Finding:

The project will result in no impacts to utilities and service systems in relation to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects. No mitigation measures are required.

Rationale:

The project will result in no impacts to utilities and service systems in relation to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects. The project site will continue to be serviced by existing City water and wastewater utility lines. The project will not create the need for or induce substantial population growth directly or indirectly and any accompanying requirements for the construction of new water or wastewater treatment facilities. The project is intended to serve existing and anticipated residents, workers, visitors, and the transit population. The project will result in no direct impacts in regard to population growth because it will not involve the construction of new housing units or businesses. The project will result in no indirect impacts in regard to population growth because it is limited to landscape improvements and the creation of a civic space and pedestrian and cycling improvements. Although these improvements will improve the convenience of accessing transit facilities at LAUS from the project vicinity, they are not major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) which will make accessible a previously inaccessible area to support population growth and accompanying wastewater increases. Therefore, the project will not result in significant impacts to utilities and service systems and no further analysis related to new water or wastewater treatment requirements is warranted.

⁴⁶ California Code of Regulations, Title 20, Public Utilities and Energy.

⁴⁷ California Code of Regulations, Title 20, Public Utilities and Energy.

The project area will be serviced by HTP, which has a design capacity of 450 mgd and treats an average of 275 mgd. Furthermore, in November 2006, the Los Angeles City Council approved the Integrated Resources Plan (IRP), which accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the City through the year 2020. The IRP addresses increases in wastewater flows through improvements, additions, and expansions within the HTP service area. These improvements will increase the capacity of the HTP service area to 570 mgd, consisting of HTP's capacity of 450 mgd, TWRP's new capacity of 100 mgd, and LAGWRP's capacity of 20 mgd.⁴⁸ The City of Los Angeles prepared the One Water LA 2040 Plan (One Water LA), an integrated approach for water supply, wastewater treatment, and stormwater management.⁴⁹ One Water LA is a comprehensive planning process designed to increase sustainable water management for the City of Los Angeles. One Water LA's goal is to meet the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024. As of today, all projects have been completed within treatment plants and sewer lines, and additional ongoing improvements have been in order to continually provide services to meet wastewater needs for the City. The project will develop a small transit-serving building, which may include a restroom with a water efficient commercial toilet (1.28 gallons per flush), and a water efficient commercial urinal (0.125 gallons per flush).⁵⁰ The project, if developed, will generate on average 2,559 gallons per year (gpy) of waste water (commercial efficient toilet: 1,974 gpy; commercial efficient urinal: 585 gpy).⁵¹ The HTP has more than adequate treatment capacity to handle the wastewater generated from the restroom, in the small transit-serving building, if developed.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Impact:

No Impact

Finding:

The project will result in less than significant impacts to utilities and service systems in relation to the construction of new stormwater drainage facilities or expansion of existing facilities, which could cause significant environmental impacts. No mitigation measures are required.

Rationale:

The project will result in no impacts to utilities and service systems in relation to the construction of new stormwater drainage facilities or expansion of existing facilities, which could cause significant environmental impacts. As currently designed, about 170,000 square feet of impervious surface will be replaced with hardscape and landscape improvements. The RWQCB regulates runoff during clearing, grading, and excavation activities that may result in soil disturbance of any construction site of at least 1

⁴⁸ City of Los Angeles Bureau of Sanitation and Department of Water and Power. September 2006. *City of Los Angeles Integrated Resources Plan: Implementation Strategy*. Prepared by CH:CDM.

⁴⁹ –City of Los Angeles. 4 May 2015. One Water 2040 Plan Guiding Principles Report.

⁵⁰ California Code of Regulations, Title 20, Public Utilities and Energy.

⁵¹ California Code of Regulations, Title 20, Public Utilities and Energy.

acre of total land area. Additionally the City LID Ordinance further regulates Development or Redevelopment that creates, adds or replaces 500 square feet or more of impervious area. The total project site encompasses approximately 6.71 acres, and therefore, construction activities will be subject to the requirements of a NPDES Permit issued by the RWQCB. Metro will consult with the City regarding the design, construction, and operation of facilities that affect net impervious surface in relation to the City LID requirements, outlined in the LID Ordinance.

The NPDES General Construction Permit requires that all developers of land where construction activities will occur over more than 1 acre (1) develop and implement a SWPPP, which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards and (2) eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation. The SWPPP typically includes minimization of erosion during construction, stabilization of construction areas, sediment control, control of pollutants from construction materials, as well as post-construction stormwater management (e.g., the minimization of impervious surfaces, treatment of stormwater runoff, etc.). The SWPPP also must include a discussion of the program to inspect and maintain all BMPs. The City of Los Angeles Development Best Management Practices Handbook, Part A, Construction Activities, Second Edition, contains specific minimum BMP requirements for all construction activities. During project operation, a SUSMP and LID Plan will be implemented.

The SUSMP shall contain post-construction BMPs to support the operation and maintenance of the project elements. In the development of the SUSMP, Metro will evaluate the City of Los Angeles Development Best Management Practices Handbook, Part B Planning Activities. The SUSMP requires project proponents to mitigate (infiltrate or treat) the stormwater runoff (volume or flow rate) generated from 0.75 inch of rainfall over 24 hours.

A SWPPP shall be developed to support the construction of each element of the project, in a manner that meets the requirements for issuance of a NPDES permit. The SWPPP shall contain BMPs that are routinely used by Metro and its contractors on construction efforts throughout the City and County. The appropriate BMPs shall be designed to reduce the potential pollutants of concern in the project's surface water runoff. The project's SUSMP, inclusive of LID BMPs, will be reviewed and revised over time to ensure that BMPs are functioning properly and are effective at treating runoff from the site throughout the life of the project. The project will also incorporate BMPs that will detain surface water runoff as well as treating these waters, either actively or passively, before discharging these waters to the local storm drain system. Through the incorporation of the requisite BMPs, development of the project is anticipated to improve the quality of the water discharged from the site, compared to existing conditions. Compliance with the requirements of the NPDES Permit and the SUSMP will ensure that the construction or operation of the project will not violate any water quality or waste discharge requirements.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

Impact:

No Impact

Finding:

The project will result in no impact in regards to having sufficient water supplies to serve the project from existing entitlements and resources, or in regards to new expanded entitlements being needed. No mitigation measures are required.

Rationale:

LADWP is committed to providing a highly reliable water supply by implementing cost-effective conservation, recycled water, and stormwater capture programs, and ultimately meeting the required future targets for water demand.⁵² The project will result in no impact in regards to having sufficient water supplies to serve the project from existing entitlements and resources, or in regards to new expanded entitlements being needed. The project will not require the LADWP to acquire new water entitlements and result in no impacts. The project will not induce substantial population growth directly or indirectly that will result in not result in an increase in water demand. The project is intended to serve existing and anticipated residents, workers, visitors, and the transit population. The project will result in no direct impacts in regard to population growth because it will not involve the construction of new housing units or businesses. The project will result in no indirect impacts in regard to population growth because it is limited to landscape improvements and the creation of public open space and pedestrian and cycling improvements. Although these improvements will improve the convenience of accessing transit facilities at LAUS from the project vicinity, they are not major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) which will make accessible a previously inaccessible area to support population growth and accompanying need for large quantities of water.

- e) **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Impact:

No Impact

Finding:

The project will result in no impacts to wastewater treatment capacity. No mitigation measures are required.

Rationale:

The project will result in no impacts to wastewater treatment capacity. The project will not induce substantial population growth directly or indirectly that will result in an increase in solid waste. The project will include a small transit-serving building, which may include a restroom with a water efficient

⁵² LADWP Water Management Plan. 2015. Available at:
https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelectionMethod=LatestReleased

commercial toilet (1.28 gallons per flush), and a water efficient commercial urinal (0.125 gallons per flush).⁵³ The restroom, if developed, will generate on average 2,559 gallons per year (gpy) of waste water (commercial efficient toilet: 1,974 gpy; commercial efficient urinal: 585 gpy).⁵⁴ The HTP has more than adequate treatment capacity to handle the wastewater generated from the restroom in the small transit-serving building, if developed. The project is intended to serve existing and anticipated residents, workers, visitors, and the transit population. The project will result in no direct impacts in regard to population growth because it will not involve the construction of new housing units or businesses. The project will result in no indirect impacts in regard to population growth because it is limited to landscape improvements and the creation of public civic space and pedestrian and cycling improvements. Although these improvements will improve the convenience of accessing transit facilities at LAUS from the project vicinity, they are not major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) which will make accessible a previously inaccessible area to support population growth and the accompanying need for additional solid waste handling.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Impact:

No Impact

Finding:

The project will result in no impacts to the Bureau of Sanitation landfill capacity. No mitigation measures are required.

Rationale:

The project will result in no impacts to the Bureau of Sanitation landfill capacity. The project will not induce substantial population growth directly or indirectly that will result in an increase in solid waste. The project is intended to serve existing and anticipated residents, workers, visitors, and the transit population. The project will result in no direct impacts in regard to population growth because it will not involve the construction of new housing units or businesses. The project will result in no indirect impacts in regard to population growth because it is limited to landscape improvements and the creation of public civic space and pedestrian and cycling improvements. Although these improvements will improve the convenience of accessing transit facilities at LAUS from the project vicinity, they are not major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) which will make accessible a previously inaccessible area to support population growth and the accompanying need for additional solid waste handling. Therefore, the project will not overcome the permit limits for the existing Bureau of Sanitation's Sunshine Canyon and Chiquita Canyon landfills.

⁵³ California Code of Regulations, Title 20, Public Utilities and Energy.

⁵⁴ California Code of Regulations, Title 20, Public Utilities and Energy.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Impact:

No Impact

Finding:

The project will result in no impacts to federal, state, and local statutes and regulations related to solid waste. No mitigation measures are required.

Rationale:

The project will result in no impacts related to solid waste in relation to compliance with applicable federal, state, and local statutes and regulations pertaining to solid waste. The project will not increase population thus leading to an increase in solid waste, nor will it increase solid waste, or how solid waste is currently disposed of or handled. All forecourt waste will be managed on a daily basis and deposited at the existing LAUS waste disposal and recycling pick-up area located near the back entrance of the Amtrak Bus Plaza. As population is not expected to increase as a result of the project, no modifications will need to be made to current solid waste disposal practices or municipal solid waste landfills.

The composition of solid waste from the project area will be representative of the existing composition during and after construction. The project is intended to serve existing and anticipated residents, workers, visitors, and the transit population. The project will result in no direct impacts in regard to population growth because it will not involve the construction of new housing units or businesses that will result in substantial increases in waste generation. The project will result in no indirect impacts in regard to population growth because it is limited to landscape improvements and the creation of public civic space and pedestrian and cycling improvements. Although these improvements will improve the convenience of accessing transit facilities at LAUS from the project vicinity, they are not major infrastructure system extensions (such as roads, highways, bridges, utility lines, major drainage improvements, or grading) which will make accessible a previously inaccessible area to support population growth and alter the composition of the solid waste.

SECTION III

**POTENTIAL ENVIRONMENTAL EFFECTS THAT CAN
BE MITIGATED TO A LEVEL OF INSIGNIFICANCE**

The analysis undertaken in support of the Environmental Impact Report (EIR) for the Los Angeles Union Station Forecourt and Esplanade Improvements project (project) identified potentially significant impacts for four of the 18 environmental resource areas. This section presents the findings for the three issues where impacts can be reduced to below the level of significance with the incorporation of the specified mitigation measures: biological resources, cultural resources (including tribal cultural resources), and hazards and hazardous materials. The specific impacts associated with the issue areas that were reduced to below the level of significance are discussed in this section.

1. Biological Resources (one of six impact areas)
2. Cultural Resources (five of five impact areas)
3. Hazards and Hazardous Materials (two of eight impact areas)

III.1 BIOLOGICAL RESOURCES

The EIR determined that the approved project (Alternative 3: Restricted Left Hand Turns from Los Angeles Street [aka Modified Partial Closure]) would result in no impacts or less than significant impacts in relation to five of the six questions recommended for consideration by the State California Environmental Quality Act (CEQA) Guidelines. This section provides the findings related to Question (d) for the consideration of movement of resident or migratory fish or wildlife species, where the consideration of mitigation measures is required to reduce impacts to below the level of significance.

Would the project:

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Impact:

Less than Significant after Mitigation

Finding:

Implementation of Mitigation Measure MM-BIO-1 would ensure that there is no “take” of active nests of birds, afforded protection pursuant to the federal Migratory Bird Treaty Act (MBTA), during construction, thus reducing direct, indirect, and cumulative impacts to biological resources to below the level of significance.

Rationale:

The above finding is made based on the analysis included in Section 3.5, *Biological Resources*, and Section 4.2.3, *Alternative 3*, of the EIR. The implementation of Mitigation Measure MM-BIO-1 would reduce the level of direct, indirect, and cumulative impacts to biological resources to below the level of

significance. Construction of the proposed project elements would require removal of approximately 38 non-native trees that have the potential to serve as suitable habitat for nesting bird species protected pursuant to the federal MBTA. As part of the project development, approximately 84 trees would be planted at the project site, resulting in a net increase of approximately 46 trees that may provide suitable nesting habitat for birds.

Mitigation Measures

MM-BIO-1: *Nesting Bird Avoidance*. Within one week (7 days) prior to the start of construction, ground disturbance, or vegetation trimming/removal activities and within nesting bird season, which occurs between February 1 and August 31, a qualified biologist shall conduct pre-construction nesting bird surveys to identify the presence of nesting birds protected by the Migratory Bird Treaty Act (MBTA), the Bald and Golden Eagle Protection Act, and the California and federal Endangered Species Acts. If nesting birds are encountered during the preconstruction nesting surveys, a 150-foot radius (from the center point of the tree location, i.e., a 300-foot diameter) disturbance-free buffer, pursuant to the MBTA, shall be established around each nest, and no activities shall be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. If for any reason an active bird nest must be removed during the nesting season, the applicant shall be required to obtain all necessary permits from the United States Fish and Wildlife Service and the California Department of Fish and Wildlife authorizing the nest relocation. Whenever feasible, removal of existing trees and ground disturbance, and/or vegetation removal/trimming activities within a 150-foot radius of trees with active nests shall take place outside of the nesting bird season.

III.2 CULTURAL RESOURCES

The EIR determined that the approved project (Alternative 3: Restricted Left Hand Turns from Los Angeles Street [aka Modified Partial Closure]) would result in potentially significant impacts in relation to the four questions recommended for consideration by the State CEQA Guidelines, in addition to potentially significant impacts to tribal cultural resources.

Would the project:

- a) **Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?**

Impact:

Less than Significant after Mitigation

Finding:

Implementation of Mitigation Measures MM-CULTURAL-1 and MM-CULTURAL-2 would reduce the level of direct, indirect, and cumulative impacts to historical resources to below the level of significance.

Rationale:

The above finding is made based on the analysis included in Section 3.6, *Cultural Resources* and Section 4.2.3, *Alternative 3*, of the EIR. The implementation of Mitigation Measures MM-CULTURAL-1 and MM-

CULTURAL-2 would reduce the level of direct, indirect, and cumulative impacts to historical resources to below the level of significance. Excavations in the areas surrounding the proposed project area have encountered significant historic archaeological resources. Construction of the proposed project elements would require excavation up to 15 feet below ground surface to install project features in areas comprising the existing short-term parking area; up to 4 feet below ground surface for the Alameda Street, and the associated Esplanade improvements; and up to 15 feet below ground surface for tree wells in the sidewalks. This excavation has the potential to encounter previously unrecorded historical resources.

Mitigation Measures

MM-CULTURAL-1: *Archaeological and Historical Resources – Avoidance and Monitoring.* Completion of a Worker Education and Awareness Program (WEAP) for all personnel who will be engaged in ground-disturbing activities shall be required prior to the start of ground-disturbing activities. This shall include training that provides an overview of cultural resources that might potentially be found and the appropriate procedures to follow if cultural resources are identified. This requirement extends to any new staff prior to engaging in ground disturbing activities.

An environmental sensitive area shall be established through the use of construction fencing to minimize the potential for built environment resources to be damaged during construction activities.

Metro shall require monitoring by a safety qualified archaeologist and Native American monitor of all ground-disturbing activities according to the protocols and guidelines of the project specific archaeological and paleontological monitoring program to ensure project safety.

In the event that previously unknown unique archaeological resources, significant historical resources, or tribal cultural resources are encountered during construction, the resources shall either be left in situ and avoided; or the resources shall be salvaged, recorded, and repositied consistent with the provisions of a Phase III data recovery program consistent with the provisions of a Cultural Resources Management Plan. Data recovery is not required by law or regulation. It is, however, the most commonly agreed-upon measure to mitigate adverse effects to archaeological sites eligible or listed under Section 106 Criterion D, as it preserves important information that would otherwise be lost.

MM-CULTURAL-2: *CRMP and Pre-Construction Testing.* Prior to construction, a Cultural Resource Management Plan (CRMP) will be prepared that will target areas within the archaeological APE most likely to contain buried cultural resources. Subsurface test excavation will be conducted to ensure that the Project will identify and evaluate significant archaeological resources. A research design and work plan will be focused on the physical identification of intact subsurface archaeological remains. Prior to construction, Phase II archaeological testing will be conducted in areas most likely to contain buried cultural resources in soils that have been predominantly *in situ* during the past 50 years within the boundaries of recorded unique archaeological resources, significant historical resources as defined in Section 15064.5(a) of the State CEQA Guidelines, or tribal cultural resources as defined in AB 52. If resources are discovered during Phase II testing prior to construction, they will be evaluated for significance with criteria set forth in the CRMP. If significant archaeological deposits are found during test excavations prior to construction, a mitigation plan will be developed to ensure that important archaeological data are not lost. The mitigation plan will include methods by which prehistoric, protohistoric, and historical archaeological deposits will be avoided or recovered prior to construction. If the testing determines no unique archaeological resources or significant historical resources, including

potential tribal cultural resources, then the work shall proceed consistent with the provisions of MM-CULTURAL-1.

Where the project site has been subject to testing within two years of the proposed activity and no unique archaeological resources, significant cultural resources, or tribal cultural resources are known from the project site, work shall proceed per the provision of Mitigation Measure CULTURAL-1.

- a. If the testing determines potential unique archaeological resources or significant historical resources, including potential tribal cultural resources, at a depth that will be affected by the ground-disturbing activities, one of two courses of action shall be employed:
 1. Where avoidance is feasible, the ground disturbance shall be modified to avoid the potentially significant resource, and the work shall then proceed consistent with the provisions of MM-CULTURAL-1. An archaeological monitor shall be present during ground-disturbing activities. In addition, consultation shall be undertaken with the local Native American Tribal contacts designated by the NAHC to determine if a Native American monitor shall also be present during all or a portion of the ground-disturbing activities.
 2. Where avoidance is not feasible, a Phase II evaluation of the cultural resources shall be undertaken to determine the significance of the cultural resource. If the Phase II investigation identifies a unique/eligible cultural resource within the area proposed for ground-disturbing work, Metro shall determine whether to avoid the resource through redesign or proceed with a Phase III data recovery program consistent with the provisions of a Cultural Resource Management Plan. The work shall then proceed consistent with the provisions of MM-CULTURAL-1.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Impact:

Less than Significant after Mitigation

Finding:

Implementation of Mitigation Measures MM-CULTURAL-1 and MM-CULTURAL-2 would reduce the level of direct, indirect, and cumulative impacts to archaeological resources to below the level of significance.

Rationale:

The above finding is made based on the analysis included in Section 3.6, *Cultural Resources* and Section 4.2.3, *Alternative 3*, of the EIR. The implementation of Mitigation Measures MM-CULTURAL-1 and MM-CULTURAL-2 would reduce the level of direct, indirect, and cumulative impacts to archaeological resources to below the level of significance. Excavations in the areas surrounding the proposed project area have encountered significant historic archaeological resources. Construction of the proposed project elements would require excavation up to 15 feet below ground surface to install project features in areas comprising the existing short-term parking area; up to 4 feet below ground surface for the Alameda Street, and the associated Esplanade improvements; and up to 15 feet below ground surface

for tree wells in the sidewalks. This excavation has the potential to encounter previously unrecorded historical resources.

Mitigation Measures

MM-CULTURAL-1

MM-CULTURAL-2

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact:

Less than Significant after Mitigation

Finding:

Implementation of Mitigation Measure MM-CULTURAL-3 would reduce the level of direct, indirect, and cumulative impacts to paleontological resources to below the level of significance.

Rationale:

The above finding is made based on the analysis included in Section 3.6, *Cultural Resources* and Section 4.2.3, *Alternative 3*, of the EIR. The implementation of Mitigation Measure MM-CULTURAL-3 would reduce the level of direct, indirect, and cumulative impacts to paleontological resources to below the level of significance. Excavations in the areas surrounding the proposed project area have encountered significant paleontological resources. Construction of the proposed project elements would include excavation up to 15 feet below ground surface to install project features in areas comprising the existing short-term parking areas, Alameda Street, and the associated sidewalks and landscape area. Surface grading or very shallow excavations in the younger Quaternary alluvium of the proposed project area are unlikely to encounter significant fossil vertebrate remains. Deeper excavations that extend down into older Quaternary deposits, however, could uncover significant vertebrate fossils. This excavation has the potential to encounter unrecorded significant paleontological resources.

Mitigation Measures

MM-CULTURAL-3: *Paleontological Resources – Paleontological Monitoring*. Impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance by monitoring, salvage, and curation of unanticipated paleontological resources discovered during ground-disturbing activities in previously undisturbed native soils located 6 or more feet below the ground surface that would have the potential to contact geologic units with a high to moderate potential to yield unique paleontological resources. Ground-disturbing activities include, but are not limited to, drilling, excavation, trenching, and grading. If paleontological resources are encountered during ground-disturbing activities, work stops, an assessment of the site is conducted. No work shall proceed within immediate vicinity until the salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology is completed. At the time that work is continued to be authorized, Metro

shall require and be responsible for salvage and recovery of those resources consistent with standards for such recovery established by the Society of Vertebrate Paleontology.

Paleontological Resource Sensitivity Training shall be required for all project personnel prior to the start of ground-disturbing activities in geologic units with a moderate to high potential to yield unique paleontological resources. This shall include a brief field training that provides an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified. This requirement shall extend to any new staff joining the project.

Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed geologic units 6 feet or more below the ground surface and have the potential to encounter geologic units with a moderate to high potential to yield unique paleontological resources. In the event that a paleontological resource is encountered during construction, all ground-disturbing activity within 100 feet of the find shall be halted until a qualified paleontologist can evaluate the significance of the discovery. Additional monitoring recommendations may be required. If the resource is found to be significant, the paleontologist shall determine the most appropriate treatment and method for removing and stabilizing the specimen. Curation of the any significant paleontological finds shall be required with a qualified repository, such as the Natural History Museum of Los Angeles County.

Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to Metro with an appended, itemized inventory of specimens. The report and inventory, when submitted to Metro, shall signify the completion of the program to mitigate impacts to paleontological resources.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Impact:

Less than Significant after Mitigation

Finding:

Implementation of Mitigation Measure MM-CULTURAL-4 would reduce the level of direct, indirect, and cumulative impacts to human remains to below the level of significance.

Rationale:

The above finding is made based on the analysis included in Section 3.6, *Cultural Resources* and Section 4.2.3, *Alternative 3*, of the EIR. The implementation of Mitigation Measure MM-CULTURAL-4 would reduce the level of direct, indirect, and cumulative impacts to human remains to below the level of significance. Exposure of human remains is of particular concern within CA-LAN-1575/H, an extensive site surrounding Los Angeles Union Station known to contain human remains. The replacement of the parking lot west of Los Angeles Union Station is proposed within this site, in an area approximately 225 feet (70 meters) northwest of where human remains were recovered in 1996 at a depth of between 3 and 8 feet below ground surface. Portions of the Native American cemetery were removed after data-recovery excavations, but additional deposits likely exist in other portions of the site.

Mitigation Measures

MM-CULTURAL-4: Regulatory Requirements – Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains.

If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the NAHC in Sacramento within 24 hours. In accordance with Section 5097.98 of the California PRC, the NAHC shall immediately notify the person(s) it believes to be the Most Likely Descendant of the deceased Native American. The descendants shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with Metro, the disposition of the human remains. The Most Likely Descendant's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If Metro rejects the Most Likely Descendant's recommendations, the agency shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (14 California Code of Regulations §15064.5(e)).

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe?

Impact:

Less than Significant after Mitigation

Finding:

Implementation of Mitigation Measures MM-CULTURAL-1 and MM-CULTURAL-2 would reduce the level of direct, indirect, and cumulative impacts to tribal cultural resources to below the level of significance.

Rationale:

The above finding is made based on the analysis included in Section 3.6, *Cultural Resources* and Section 4.2.3, *Alternative 3*, of the EIR. The implementation of Mitigation Measures MM-CULTURAL-1 and MM-CULTURAL-2 would reduce the level of direct, indirect, and cumulative impacts to Tribal cultural resources to below the level of significance. Excavations in the areas surrounding the proposed project area have encountered significant tribal resources. Construction of the proposed project elements would include excavation up to 15 feet below ground surface to install project features in areas comprising the existing short-term parking areas, Alameda Street, and the associated sidewalks and landscape area. This excavation has the potential to encounter significant tribal resources. Records of tribal cultural resources were found in the USGS Los Angeles topographical quadrangle. The Gabrielino village of Yaanga (Yang-na) was originally located on the western bank of the Los Angeles River where Pueblo de Los Angeles was later established. A Native American cemetery was found within the

proposed project site during monitoring in 1996 for the MWD Headquarters. The cemetery was recorded as part of multicomponent site P-19-001575 (CA-LAN-1575/H). Twenty-three burial features were excavated at the site in 1996. The northwestern portion of the cemetery was likely affected by the construction of the Los Angeles Union Station building in the 1930s. The Native American cemetery on this site is considered sacred to the Gabrieleno Tongva. Portions of the cemetery were removed during data-recovery operations in 1996, approximately 240 feet (75 meters) east of the forecourt improvement impact area, but additional deposits likely exist in other portions of CA-LAN-1575/H. The physical removal and destruction of burials, artifacts, and features at CA-LAN-1575/H would result in a substantial adverse change under CEQA.

Mitigation Measures

MM-CULTURAL-1
MM-CULTURAL-2

III.3 HAZARDS AND HAZARDOUS MATERIALS

The EIR determined that the approved project would result in no impacts or less than significant impacts in relation to six of the eight questions recommended for consideration by the State CEQA Guidelines. This section provides the findings related to Question (b) for the potential to create a significant hazard to the public in relation to reasonably foreseeable upset and accident conditions involving the release of hazardous materials; and Question (c) related to emitting or handling hazardous materials within ¼ mile of a school, where the consideration of mitigation measures is required to reduce impacts to below the level of significance.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

Impact:

Less than Significant after Mitigation

Finding:

Implementation of Mitigation Measures MM-HAZ-1 through MM-HAZ-4 would ensure that contaminated properties are identified and appropriate steps are taken to minimize human exposure and prevent any further environmental contamination, thus reducing direct, indirect, and cumulative impacts to below the level of significance.

Rationale:

The above finding is made based on the analysis included in Section 3.9, *Hazards and Hazardous Materials*, and Section 4.2.3, *Alternative 3*, of the EIR. Implementation of Mitigation Measures MM-HAZ-1 through MM-HAZ-4 would ensure that contaminated properties are identified and appropriate steps are taken to minimize human exposure and prevent any further environmental contamination, thus reducing direct, indirect, and cumulative impacts to below the level of significance.

Mitigation Measures

MM-HAZ-1: If soil in the vicinity of the former railroad tracks alignment along Alameda Street and the rail spurs into the Forecourt parking area is planned for excavation and off-site disposal as part of the proposed Project improvements, soil shall be sampled and analyzed for the potential presence of petroleum hydrocarbons, metals and persistent pesticides. The samples should be analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), CCR Title 22 Metals, and organochlorine pesticides (OCPs) using United States EPA Methods 8015B(M), 8260B, 6010B/7471A, and 8081, respectively. This methodology should be documented in a Soil Management Plan prior to construction. During construction, soil excavations conducted on site shall be monitored for visible soil staining and odor. Impacted soils shall be disposed off site in accordance with pertinent local, state, and federal regulatory guidelines.

MM-HAZ-2: If soil in the vicinity of the former gasoline station is planned for excavation and off-site disposal as part of the proposed Project improvements, soil sampling shall be performed along the west side of Alameda Street within the Project area, in the vicinity of the former gasoline station. Soil samples should be analyzed for the presence of TPH, VOCs, and lead using United States EPA Methods 8015B(M), 8260B, and 6010B, respectively. Prior to construction, a Soil Management Plan should be prepared. During construction, soil excavations conducted on site shall be monitored for visible soil staining and odor. Impacted soils shall be disposed off site in accordance with pertinent local, state, and federal regulatory guidelines.

MM-HAZ-3: If yellow traffic markings are removed separately from the adjacent pavement, the markings shall be removed and sampled for lead chromate prior to construction, consistent with the current Caltrans' Standard Special Provisions (SSP).

MM-HAZ-4: Should evidence of naturally-occurring oil seeps within the Project area, or impacted soil from a crude oil pipeline beneath Alameda Street be observed, the Caltrans Unknown Hazard Procedures shall be implemented during construction activities.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact:

Less than Significant after Mitigation

Finding:

Implementation of Mitigation Measures MM-HAZ-1 through MM-HAZ-4 would ensure that contaminated properties are identified and appropriate steps are taken to minimize human exposure and prevent any further environmental contamination, thus reducing direct, indirect, and cumulative impacts to below the level of significance.

Rationale:

The above finding is made based on the analysis included in Section 3.9, *Hazards and Hazardous Materials*, and Section 4.2.3, *Alternative 3*, of the EIR. Implementation of Mitigation Measures MM-HAZ-

1 through MM-HAZ-4 would ensure that contaminated properties are identified and appropriate steps are taken to minimize human exposure and prevent any further environmental contamination, thus reducing direct, indirect, and cumulative impacts to below the level of significance.

Mitigation Measures

MM-HAZ-1

MM-HAZ-2

MM-HAZ-3

MM-HAZ-4

SECTION IV

**SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS
THAT CANNOT BE MITIGATED TO A LEVEL OF INSIGNIFICANCE**

The analysis undertaken in support of the Environmental Impact Report (EIR) for the Los Angeles Union Station Forecourt and Esplanade Improvements Project (project) identified potentially significant impacts for four of the 18 environmental resource areas. Significant impacts for three of the four areas were able to be reduced to below the level of significance with mitigation measures. This section presents findings for the single issue where impacts would remain significant and unavoidable:

1. Transportation and Traffic (one of seven impact areas¹)

The Los Angeles County Metropolitan Transportation Authority (Metro) has determined that even with the consideration of mitigation measures, the approved project (Alternative 3: Restricted Left Hand Turns from Los Angeles Street [aka Modified Partial Closure]) will result in significant and unavoidable impacts to transportation and traffic, in relation to optimizing effectiveness of vehicular traffic in relation to Mobility Plan 2035 of the City of Los Angeles General Plan. No feasible mitigation measures have been identified. The two action alternatives evaluated in the EIR result in comparable significant and unavoidable impacts. Consequently, in accordance with Section 15093 of the State California Environmental Quality Act (CEQA) Guidelines, a Statement of Overriding Considerations is required.

IV.1 TRANSPORTATION AND TRAFFIC

(b) Would the proposed project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

Implementation of the approved project will result in significant and unavoidable impacts associated with this criterion, because it would exceed the City of Los Angeles' criteria for significant traffic impacts.

The following are a subset of the project objectives:

- Prioritize connectivity, convenience, and safety for the most vulnerable users (pedestrians, bicyclists, transit patrons, and community stakeholders) to safely navigate to and from the project site.
- Advance desirable and accessible public space at the LAUS forecourt that creates a visually porous and permeable connection between Union Station and the surrounding historic and cultural communities.
- Facilitate alternatives to driving by providing infrastructures that enable more walking and bicycling.²

¹ The EIR analyzed transportation and traffic under seven criteria, rather than the six identified in the State CEQA Guidelines.

² Los Angeles County Metropolitan Transportation Authority. June 2012. *Climate Action and Adaptation Plan*. Prepared by ICF International. Available at: http://media.metro.net/projects_studies/sustainability/images/Climate_Action_Plan.pdf

- Enhance the safety and quality of pedestrian and bicycle connections between the station and El pueblo historic Monument, Father Serra Park, Olvera Street, and nearby business and neighborhood.^{3,4}
- Advance comprehensive planning for Los Angeles Union Station that leverages it as the major regional transportation hub, a destination, and one of the city's foremost landmarks.⁵

Due to inconsistency with these objectives, physical traffic capacity mitigation measures, such as widening intersections, are considered infeasible because roadway widening to accommodate additional turn lanes, through lanes and so forth, increases pedestrian crossing distances and exposure to vehicle turning movements and thereby reduce pedestrian safety. Therefore, no feasible physical mitigation is identified. Signal timing modifications could partially mitigate project impacts in concert with other operational enhancements, which are incorporated in the action alternatives analyzed in the EIR.

Impact:

Significant and Unavoidable

Finding:

There are no feasible measures capable of reducing impacts to below the level of significance. The no-project alternative is capable of avoiding impacts; however; the no-project alternative is not capable of meeting the basic objectives of the project related to improving safety and connectivity for pedestrian and cyclists. Two action alternatives capable of achieving the basic objectives of the project were considered: Alternative 2, Full Closure of Los Angeles Street (up to the El Pueblo crosswalk), and Alternative 3, Restricted Left Hand Turns from Los Angeles Street (aka Modified Partial Closure). Similar to the approved project (Alternative 3), the EIR proposed project and Alternative 2 would result in comparable significant and unavoidable impacts.

Rationale:

The above finding is made based on the analysis included in Section 3.17, *Transportation and Traffic*, and Section 4.2.3, Alternative 3, of the EIR.

The Future with Alternative 3 (2029) scenario results in significant impacts at 11 intersections:

10. Alameda Street & Alhambra Avenue (AM)
12. North Broadway & Cesar E. Chavez Avenue (PM)
16. North Main Street & Cesar E. Chavez Avenue (PM)
17. Alameda Street & Cesar E. Chavez Avenue (AM & PM)
18. Union Station Driveway & Cesar E. Chavez Avenue (AM)
21. North Spring Street & Arcadia Street (PM)

³ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

⁴ City of Los Angeles. Accessed 8 July 2017. Vision Zero. Los Angeles 2015-2025. Available at: <http://visionzero.lacity.org/map/>

⁵ City of Los Angeles Department of City Planning. 2016. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Policy 3.6, p. 88. Accessed August 2, 2017.

25. Alameda Street & Arcadia Street (PM)
27. North Spring Street & Aliso Street (PM)
28. North Main Street & Aliso Street (AM & PM)
29. North Los Angeles Street & Aliso Street (PM)
35. North Los Angeles Street & Temple Street (AM)

Under the Future with Alternative 3 (2029) scenario, the US-101 Northbound Ramp/Arcadia Street & Alameda Street continues to exceed ramp storage under both AM and PM peak hour. Based on the significant impact criteria detailed in Section 3.6, this impact is considered significant. Average queuing decreases under Alternative 3 in the AM peak hour and increases in the PM peak hour. No other analyzed off-ramps exceed the ramp storage under this scenario.

The EIR considered the approved project (Alternative 3), No Project Alternative, and two action alternatives: the EIR proposed project and Alternative 2, Full Closure of Los Angeles Street.

Section 4.0, *Alternatives to the Proposed Project*, of the EIR evaluates the effectiveness of each of the alternatives to achieve the basic objectives of the project described in Section 2.0, *Project Description*, of the EIR. The approved project (Alternative 3) and the two action alternatives (EIR proposed project and Alternative 2), are capable of meeting all of the basic objectives of the project.

A Statement of Overriding Considerations has been prepared (see Section IX of this document) to address the social and community, economic, and sustainability benefits of the project that outweigh the significant and unavoidable impacts to 11 intersections and freeway ramps.

Facts:

Mitigation measures to address off-ramp queue exceedances typically include the following potential strategies:

- Off-ramp widening to provide additional queue storage
- Increase green time for the off-ramp to flush the queue more quickly on to city streets

The impacted off-ramp is physically constrained by the existing bus stop island immediately to the north of the ramp, and by a step grade down to the US-101 southbound lanes south of the ramp. Additionally, widening the off-ramp, which is currently four lanes wide, is considered infeasible because it would be inconsistent with the project's objective to enhance pedestrian and bicycle facilities. Roadway widening to accommodate a fifth off-ramp lane would increase pedestrian crossing distances and exposure to vehicle turning movements. Therefore, no feasible physical mitigation is identified to mitigate this impact.

Increasing green time at this location for the off-ramp would worsen arterial intersection impacts on Alameda Street and connecting streets, because it would take green time away from Alameda Street. Due to the closely-spaced arterial intersections, this further exacerbation of arterial queuing would worsen overall transportation network performance, and is therefore considered infeasible. Therefore, the significant impact is considered significant and unavoidable.

However, to develop concepts to enhance access to, and enhance the performance of, freeway ramps, as well as the safety of pedestrian and bicycle crossings at ramps, Metro, in partnership with the City of Los Angeles and Caltrans, intends to pursue the preparation of a Project Study Report (PSR). The PSR is a more

appropriate tool to evaluate the opportunities for feasible improvements to freeway ramp facilities around LAUS that are affected by recent past, current, and reasonably foreseeable projects that will define the future effects on regional facilities, rather than burdening this project, which has a limited contribution to the cumulative effects with the burden of mitigating for the cumulative effects of regional and local projects.

The scope of the proposed PSR would be limited to a defined study regarding the access at intersection for the ExpressLanes/El Monte Busway. The goals for the project include improving pedestrian safety at the Alameda Street/Arcadia Street intersection, as well as improving access for all modes (including for vehicles accessing the ExpressLanes). The study could encompass an evaluation of Alameda Street, Los Angeles Street, Vignes Street, and Commercial Street ramps as part of achieving these goals. The authorization for Metro funding is limited to the proposed preliminary PSR. Any subsequent studies and/or resulting actions are not part of this initial commitment by Metro and will have to be discussed by the relevant public agencies.

The project will enhance pedestrian and bicycle facilities in the study area by implementing an enhanced crossing across Alameda Street into Los Angeles Street from the station to El Pueblo that will be raised and highly visible, while providing a dedicated crossing area for both pedestrians and cyclists.

The Alameda Esplanade will provide a wide multi-use path along the station's Alameda frontage to facilitate improved pedestrian and bicycle circulation.

SECTION V

FINDINGS REGARDING ALTERNATIVES

The Los Angeles County Metropolitan Transportation Authority (Metro) evaluated a proposed project, no-project alternative (Alternative 1), and two action alternatives (Alternative 2: Full Closure of Los Angeles Street Alternative; and Alternative 3: Restricted Left Hand Turns from Los Angeles Street Alternative). Alternatives were analyzed in the Environmental Impact Report (EIR) for the Los Angeles Union Station Forecourt and Esplanade Improvements Project (project) consistent with the recommendations of Section 15126.6 of the State of California Environmental Quality Act (CEQA) Guidelines, which require evaluation of a range of reasonable alternatives to the project, or to the location of the project, that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant project effects. The analysis of alternatives is limited to those that Metro determines could feasibly attain most of the basic objectives of the project. Section 15126.6(f) of the State CEQA Guidelines describes feasibility as being dependent on site suitability, economic viability, availability of infrastructure, general plan consistency, consistency with other plans or regulatory limitations, jurisdictional boundaries, and the ability of the project proponent to gain access to or acquire an alternative site. As a result of the analysis contained in the EIR regarding the environmental, health, and social characteristics of the project and alternatives, Metro recommended approval of Alternative 3. Support for the project is directly responsive to the ability to attain all of the objectives of the project and reduce significant impacts. Therefore, the approved project will meet all objectives of the project and reduce the identified significant environmental impacts to the maximum extent feasible.

The ability of the approved project (Alternative 3), the no-project alternative, and the two action scenarios (EIR Proposed Project and Alternative 2) evaluated in the EIR to meet the objectives of the project is summarized in Table V-1, *Ability of Project and Alternatives to Attain Project Objectives*. Since Alternative 3, as described in the Draft EIR, is the approved project, the Draft EIR Proposed Project becomes an alternative to the approved project.

**TABLE V-1
ABILITY OF PROJECT AND ALTERNATIVES TO ATTAIN PROJECT OBJECTIVE**

Objective	Approved Project Alternative 3: Restricted Left Hand Turns from Los Angeles Street	EIR Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Full Closure of Los Angeles Street
1. Protect and enhance Los Angeles Union Station as a national historic resource by advancing clear site lines and view sheds to the station. ¹	Yes	Yes	No	Yes
2. Prioritize connectivity, convenience, and safety for the most vulnerable users (pedestrians, bicyclists, transit patrons, and community stakeholders) to safely navigate to and from the project site. ^{2,3}	Yes	Yes	No	Yes
3. Advance desirable and accessible public space at the LAUS forecourt that creates a visually porous and permeable connection between Union Station and the surrounding historic and cultural communities. ⁴	Yes	Yes	No	Yes
4. Facilitate alternatives to driving by providing infrastructures that enable more walking and bicycling. ⁵	Yes	Yes	No	Yes
5. Enhance the safety and quality of pedestrian and bicycle connections between the station and El pueblo historic Monument, Father Serra Park, Olvera Street, and nearby business and neighborhood. ^{6,7}	Yes	Yes	No	Yes

¹ National Park Service. 1980. *National Register of Historic Places Inventory Nomination Form*. Available at: <https://npgallery.nps.gov/GetAsset?assetID=c72efa93-90ca-40ba-9ca6-ae3d3515cf37>

² City of Los Angeles Department of City Planning. 2016. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Accessed August 2, 2017.

³ Los Angeles County Metropolitan Transportation Authority. 2015. *Connect US Action Plan*. Available at: https://media.metro.net/projects_studies/union_station/images/LAUSMP_Action_Plan_Final_100515.pdf

⁴ County of Los Angeles Department of Public Health. November 2014. *The Plan for a Healthy Los Angeles*. Available at: http://publichealth.lacounty.gov/place/docs/FINAL_CTG%20HIGHLIGHTS%20Plan%20for%20Healthy%20LA_Nov%202014.pdf

⁵ Los Angeles County Metropolitan Transportation Authority. June 2012. *Climate Action and Adaptation Plan*. Prepared by ICF International. Available at: http://media.metro.net/projects_studies/sustainability/images/Climate_Action_Plan.pdf

⁶ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagtrpccs.net/Documents/2016/final/f2016RTPSCS.pdf>

⁷ City of Los Angeles. Accessed 8 July 2017. Vision Zero. Los Angeles 2015-2025. Available at: <http://visionzero.lacity.org/map/>

**TABLE V-1
ABILITY OF PROJECT AND ALTERNATIVES TO ATTAIN PROJECT OBJECTIVE**

Objective	Approved Project Alternative 3: Restricted Left Hand Turns from Los Angeles Street	EIR Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Full Closure of Los Angeles Street
6. Advance sustainability by providing for reduced consumptive water use in a cost effective manner ⁸ and improving multi-modal facilities that encourage active transportation and reduction in vehicle miles traveled. ⁹	Yes	Yes	No	Yes
7. Advance comprehensive planning for Los Angeles Union Station that leverages it as the major regional transportation hub, a destination, and one of the city's foremost landmarks. ¹⁰	Yes	Yes	No	Yes

The approved project, Alternative 3, would meet all of the basic project objectives. The no-project alternative is the environmentally superior alternative; however, it is not capable of meeting most of the basic objectives of the recommended project. Pursuant to Section 15126.6(e)(2) of the State CEQA Guidelines, if the environmentally superior alternative is the no-project alternative, the EIR shall also identify an environmentally superior alternative among the feasible action alternatives. All of the action alternatives, including the proposed project evaluated in the EIR, are capable of meeting the basic objectives of the project (Table V-1). All of the action alternative result in comparable impacts and require application of the same mitigation measures. All of the action alternative result in significant and unavoidable impacts to transportation and traffic, in relation to achieving City of Los Angeles planning goals related to optimizing circulation for vehicular traffic. Alternative 2 was identified as the environmentally superior alternative based on the fact that it most reduces the number of intersections that would experience delays during the AM and PM peak hour traffic.

Table V-2, *Comparative Analysis of Impacts for Project and Alternatives*, provides a comparative analysis for the approved project, the no-project alternative, and the two action alternatives.

⁸ Los Angeles County Metropolitan Transportation Authority. June 2010. *Water Action Plan*. Prepared by ICF International and Brezak & Associates Planning. Available at: http://media.metro.net/projects_studies/sustainability/images/Water_Plan2010_0825.pdf.

⁹ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

¹⁰ City of Los Angeles Department of City Planning. 2016. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>. Policy 3.6, p. 88. Accessed August 2, 2017.

**TABLE V-2
COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES
(Better, Similar, or Worse Compared to the Proposed Project)**

CEQA Issue Area	Approved Project: Alternative 3: Restricted Left Hand Turns from Los Angeles Street	EIR Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Full Closure of Los Angeles Street
Aesthetics (4 issue areas)	a. Less than significant impact b. No impact c. Less than significant impact d. No impact	a. Less than significant impact b. No impact c. Less than significant impact d. No impact	a. No impact b. No impact c. No impact d. No impact	a. Less than significant impact b. No impact c. Less than significant impact d. No impact
Agriculture and Forestry Resources (5 issue areas)	a. No impact b. No impact c. No impact d. No impact e. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact
Air Quality (5 issue areas)	a. Less than significant impact b. Less than significant impact c. Less than significant impact d. Less than significant impact e. Less than significant impact	a. Less than significant impact b. Less than significant impact c. Less than significant impact d. Less than significant impact e. Less than significant impact	a. No impact b. No impact c. No impact d. No impact e. No impact	a. Less than significant impact b. Less than significant impact c. Less than significant impact d. Less than significant impact e. Less than significant impact
Greenhouse Gas Emissions (2 issue areas)	a. Less than significant impact b. No impact	a. Less than significant impact b. No impact	a. No impact b. No impact	a. Less than significant impact b. No impact
Biological Resources (6 issue areas)	a. No impact b. No impact c. No impact d. Less than significant impact after mitigation e. No impact f. No impact	a. No impact b. No impact c. No impact d. Less than significant impact after mitigation e. No impact f. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact	a. No impact b. No impact c. No impact d. Less than significant impact after mitigation e. No impact f. No impact
Cultural Resources (5 issue areas)	a. Less than significant impact after mitigation b. Less than significant impact after mitigation c. Less than significant impact after mitigation d. Less than significant impact after mitigation e. Less than significant impact after mitigation	a. Less than significant impact after mitigation b. Less than significant impact after mitigation c. Less than significant impact after mitigation d. Less than significant impact after mitigation e. Less than significant impact after mitigation	a. No impact b. No impact c. No impact d. No impact e. No impact	a. Less than significant impact after mitigation b. Less than significant impact after mitigation c. Less than significant impact after mitigation d. Less than significant impact after mitigation e. Less than significant impact after mitigation
Energy (3 issue areas)	a. No impact b. Less than significant impact c. Less than significant impact	a. No impact b. Less than significant impact c. Less than significant impact	a. No impact b. No impact c. No impact	a. No impact b. Less than significant impact c. Less than significant impact
Geology and Soils (8 issue areas)	a(i). No impact a(ii). Less than significant impact a(iii). Less than significant impact a(iv). No impact b. Less than significant impact c. Less than significant impact d. Less than significant impact e. No impact	a(i). No impact a(ii). Less than significant impact a(iii). Less than significant impact a(iv). No impact b. Less than significant impact c. Less than significant impact d. Less than significant impact e. No impact	a(i). No impact a(ii). No impact a(iii). No impact a(iv). No impact b. No impact c. No impact d. No impact e. No impact	a(i). No impact a(ii). Less than significant impact a(iii). Less than significant impact a(iv). No impact b. Less than significant impact c. Less than significant impact d. Less than significant impact e. No impact

**TABLE V-2
COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES
(Better, Similar, or Worse Compared to the Proposed Project)**

CEQA Issue Area	Approved Project: Alternative 3: Restricted Left Hand Turns from Los Angeles Street	EIR Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Full Closure of Los Angeles Street
Hazards and Hazardous Materials (8 issue areas)	a. Less than significant impact b. Less than significant impact after mitigation c. Less than significant impact after mitigation d. No impact e. No impact f. No impact g. No impact h. No impact	a. Less than significant impact b. Less than significant impact after mitigation c. Less than significant impact after mitigation d. No impact e. No impact f. No impact g. No impact h. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact g. No impact h. No impact	a. Less than significant impact b. Less than significant impact after mitigation c. Less than significant impact after mitigation d. No impact e. No impact f. No impact g. No impact h. No impact
Hydrology and Water Quality (10 issue areas)	a. Less than significant impact b. No impact c. No impact d. No impact e. No impact f. Less than significant impact g. No impact h. No impact i. No impact j. No impact	a. Less than significant impact b. No impact c. No impact d. No impact e. No impact f. Less than significant impact g. No impact h. No impact i. No impact j. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact g. No impact h. No impact i. No impact j. No impact	a. Less than significant impact b. No impact c. No impact d. No impact e. No impact f. Less than significant impact g. No impact h. No impact i. No impact j. No impact
Land Use and Planning (3 issue areas)	a. No impact b. No impact c. No impact	a. No impact b. No impact c. No impact	a. No impact b. No impact c. No impact	a. No impact b. No impact c. No impact
Mineral Resources (2 issue areas)	a. No impact b. No impact	a. No impact b. No impact	a. No impact b. No impact	a. No impact b. No impact
Noise (6 issue areas)	a. Less than significant impact b. No impact c. Less than significant impact d. Less than significant impact e. No impact f. No impact	a. Less than significant impact b. No impact c. Less than significant impact d. Less than significant impact e. No impact f. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact	a. Less than significant impact b. No impact c. Less than significant impact d. Less than significant impact e. No impact f. No impact
Population and Housing (3 issue areas)	a. No impact b. No impact c. No impact	a. No impact b. No impact c. No impact	a. No impact b. No impact c. No impact	a. No impact b. No impact c. No impact
Public Services (5 issue areas)	a(i). No impact a(ii). No impact a(iii). No impact a(iv). No impact a(v). No impact	a(i). No impact a(ii). No impact a(iii). No impact a(iv). No impact a(v). No impact	a(i). No impact a(ii). No impact a(iii). No impact a(iv). No impact a(v). No impact	a(i). No impact a(ii). No impact a(iii). No impact a(iv). No impact a(v). No impact
Recreation (2 issue areas)	a. No impact b. No impact	a. No impact b. No impact	a. No impact b. No impact	a. No impact b. No impact

**TABLE V-2
COMPARATIVE ANALYSIS OF IMPACTS FOR PROJECT AND ALTERNATIVES
(Better, Similar, or Worse Compared to the Proposed Project)**

CEQA Issue Area	Approved Project: Alternative 3: Restricted Left Hand Turns from Los Angeles Street	EIR Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Full Closure of Los Angeles Street
Transportation and Traffic (7 issue areas)	a. No impact b. Significant and unavoidable impact c. No impact d. No impact e. No impact f. No impact g. No impact	a. No impact b. Significant and unavoidable impact c. No impact d. No impact e. No impact f. No impact g. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact g. No impact	a. No impact b. Significant and unavoidable impact c. No impact d. No impact e. No impact f. No impact g. No impact
Utilities and Service Systems (7 issue areas)	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact g. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact g. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact g. No impact	a. No impact b. No impact c. No impact d. No impact e. No impact f. No impact g. No impact

V.1 EIR PROPOSED PROJECT

Description of Alternative: The EIR Proposed Project alternative included many of the elements described for the approved project (Alternative 3), but would allow left hand turns onto Alameda Street from Los Angeles Street and would include all-day bus parking on Arcadia Street. The EIR Proposed Project would focus on perimeter improvements to enhance pedestrian accessibility, safety, and connectivity. The proposed improvements to LAUS include removing the short-term parking northwest of the entrance to LAUS (approximately 60 spaces) to create a new civic plaza with an outdoor seating area; creating a new esplanade along Alameda Street (between Cesar E. Chavez Avenue and Arcadia) by narrowing the roadway and reallocating roadway area for the expanded pedestrian and bicyclist multi-use esplanade on the eastside and widened sidewalks on the west; reconfiguring the entrance from LAUS to the El Pueblo de Los Angeles State Historic Park by creating a new expanded, raised pedestrian crossing that leads into a new pedestrian plaza that includes a two-way off-street bicycle path through the expanded El Pueblo plaza area near the west side of Los Angeles Street; providing pedestrian safety and additional connectivity through the partial closure of Los Angeles Street and closure of the northern LAUS driveway on Alameda Street; and repurposing the northernmost travel lane on Arcadia Street (adjacent to El Pueblo) between Alameda Street and Spring Street into a tour bus parking area designated for El Pueblo.

In addition to the above-mentioned improvements, the proposed Alameda Esplanade would change three travel lanes in each direction and a left turn center lane to two lanes of travel with a left turn lane/center median and curb side drop-off on the east side of Alameda Street; and expand sidewalks on both sides of the street into the roadway and create a shared tree-lined multi-use path for both bicyclists and pedestrians on the east side of Alameda Street. The EIR Proposed Project would consist of four general project components; the Alameda Street Improvements, the Forecourt Improvements, the partial closure of Los Angeles Street, and repurposing a travel lane on Arcadia Street.

Effectiveness in Meeting Project Objectives: The EIR Proposed Project would meet all of the objectives of the project (Table V-1).

Comparison of Effects of the Alternative to Effects of the Project: As illustrated in Table V-2 and described in Chapter 3, *Environmental Impact Analysis and Mitigation Measures*, of the EIR, the EIR Proposed Project would have similar impacts to the approved project, Alternative 3. As with the approved project, the EIR Proposed Project was determined to have no impacts or less than significant impacts in relation to 82 thresholds of significance in 17 environmental resource categories related to CEQA:

1. Aesthetics (four of four impact areas)
2. Agriculture and Forestry Resources (five of five impact areas)
3. Air Quality (five of five impact areas)
4. Biological Resources (five of six impact areas)
5. Energy (three of three impact areas)
6. Geology and Soils (eight of eight impact areas)
7. Greenhouse Gas Emissions (two of two impact areas)
8. Hazards and Hazardous Materials (six of eight impact areas)
9. Hydrology and Water Quality (ten of ten impact areas)
10. Land Use and Planning (three of three impact areas)
11. Mineral Resources (two of two impact areas)
12. Noise (six of six impact areas)
13. Population and Housing (three of three impact areas)

14. Public Services (five of five impact areas)
15. Recreation (two of two impact areas)
16. Transportation and Traffic (six of seven impact areas¹¹)
17. Utilities and Service Systems (seven of seven impact areas)

As illustrated in Table V-2 and described in Chapter 3 of the EIR, like the approved project, the EIR Proposed Project was determined to result in potentially significant impacts that would be reduced to below the level of significance for three of the 18 environmental resource areas:

1. Biological Resources (one of six impact areas)
2. Cultural Resources (five of five impact areas)
3. Hazards and Hazardous Materials (two of eight impact areas)

As illustrated in Table V-2 and described in Chapter 3 of the EIR, like the approved project, the EIR Proposed Project was determined to result in significant and unavoidable impacts to one of the 18 environmental resources areas:

1. Transportation and Traffic (one of seven impact areas)

As with the approved project, the EIR Proposed Project would result in significant and unavoidable impacts to Question (b) under Transportation and Traffic:

“Would the proposed project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?”

While both the approved project and the EIR Proposed Project would result in significant and unavoidable impacts to transportation and traffic, the EIR Proposed Project would result in greater impacts than the approved project. As described in Chapter 3 and Section 4.2.3, *Alternative 3*, of the EIR, the EIR Proposed Project would be expected to significantly impact 17 intersections, whereas the approved project (Alternative 3) is expected to significantly impact 11 intersections.

V.2 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Description of Alternative: The “no project” alternative analysis discusses the existing conditions at the time of publication of the Notice of Preparation on December 22, 2016, projected forward to the 2029 planning horizon if the project were not approved, based on current plans and consistent with available infrastructure and community services.

For this project, the “no project” alternative will leave the current conditions in place: Alameda Street with three traffic lanes in each direction; the current entrance and exit driveways from Union Station with passenger drop off at the curb in front of the building; two crosswalks across Alameda Street that connect Union Station to El Pueblo on both sides of Los Angeles Street; no changes to Los Angeles Street; no changes to the surface parking lot; and no bus parking along Arcadia Street.

¹¹ The EIR analyzed transportation and traffic under seven criteria, rather than the six identified in the State CEQA Guidelines.

Effectiveness in Meeting Project Objectives: Under the no-project alternative, none of the basic objectives would be met (Table V-1).

Comparison of Effects of the Alternative to Effects of the Project: A summary comparison of this alternative to impacts of the project is presented in Table V-2. The analysis presented in the table shows that this alternative would not result in the impacts that would be anticipated as a result of the project.

V.3 ALTERNATIVE 2: FULL CLOSURE OF LOS ANGELES STREET ALTERNATIVE

Description of Alternative: The Full Closure of Los Angeles Street Alternative would include many of the elements described for the approved project, Alternative 3, with the exception of the partial closure of Los Angeles Street. Instead of the partial closure as described, this alternative would have the complete closure from Alameda Street to the existing mid-block crosswalk across Los Angeles Street. Northbound vehicular travel on Los Angeles Street would still be open from Arcadia Street to the US 101 Northbound On-Ramp. With the complete closure, there would be a continuous pedestrian connection between Father Serra Park and El Pueblo, and a continuous sidewalk would be provided adjacent to Alameda Street. The full closure also provides the potential for a wider crossing area for pedestrians and bicyclists. The Forecourt changes would remain as proposed in the project description. This alternative would change traffic patterns because a vehicular connection between Los Angeles Street and Alameda Street would be removed, including for tour buses. On Arcadia Street, the tour bus parking lane would be provided during off-peak hours only, with the lane being used by through-traffic during peak hours.

Effectiveness in Meeting Project Objectives: Alternative 2 would meet all of the objectives of the project (Table V-1).

Comparison of Effects of the Alternative to Effects of the Project: As illustrated in Table V-2 and described in Section 4.2.2, *Alternative 2*, of the EIR, Alternative 2 would have similar impacts to the approved project, Alternative 3. As with the approved project, Alternative 2 was determined to have no impacts or less than significant impacts in relation to 82 thresholds of significance in 17 environmental resource categories related to CEQA:

1. Aesthetics (four of four impact areas)
2. Agriculture and Forestry Resources (five of five impact areas)
3. Air Quality (five of five impact areas)
4. Biological Resources (five of six impact areas)
5. Energy (three of three impact areas)
6. Geology and Soils (eight of eight impact areas)
7. Greenhouse Gas Emissions (two of two impact areas)
8. Hazards and Hazardous Materials (six of eight impact areas)
9. Hydrology and Water Quality (ten of ten impact areas)
10. Land Use and Planning (three of three impact areas)
11. Mineral Resources (two of two impact areas)
12. Noise (six of six impact areas)
13. Population and Housing (three of three impact areas)
14. Public Services (five of five impact areas)
15. Recreation (two of two impact areas)

16. Transportation and Traffic (six of seven impact areas¹²)
17. Utilities and Service Systems (seven of seven impact areas)

As illustrated in Table V-2 and described in Section 4.2.2 of the EIR, like the approved project, Alternative 2 was determined to result in potentially significant impacts that would be reduced to below the level of significance for three of the 18 environmental resource areas:

1. Biological Resources (one of six impact areas)
2. Cultural Resources (five of five impact areas)
3. Hazards and Hazardous Materials (two of eight impact areas)

As illustrated in Table V-2 and described in Section 4.2.2 of the EIR, like the approved project, Alternative 2 was determined to result in significant and unavoidable impacts to one of the 18 environmental resources areas:

1. Transportation and Traffic (one of seven impact areas)

As with the approved project, Alternative 2 would result in significant and unavoidable impacts to Question (b) under Transportation and Traffic:

“Would the proposed project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?”

While both the approved project and Alternative 2 would result in significant and unavoidable impacts to transportation and traffic, Alternative 2 would result in lesser impacts than the approved project. As described in Sections 4.2.2 and 4.2.3 of the EIR, Alternative 2 would be expected to significantly impact 9 intersections, whereas the approved project (Alternative 3) is expected to significantly impact 11 intersections. Accordingly, Alternative 2 was found to be the environmentally superior alternative. However, Alternative 2 has more AM peak hour significant impacts compared with the approved project, but fewer PM peak hour significant impacts compared with the approved project, so each alternative has benefits over the other during either the AM or PM peak.

Although found to be the environmentally superior alternative, Alternative 2 encountered significant opposition from local business enterprises who felt that the full closure of Los Angeles Street would encumber day-to-day operations, access by police/paramedics/fire department and other public safety vehicles, goods delivery to local merchants and reduce accessibility of visitors to El Pueblo who travel by car or bus.

¹² The EIR analyzed transportation and traffic under seven criteria, rather than the six identified in the State CEQA Guidelines.

SECTION VI

FINDINGS REGARDING MITIGATION MONITORING PROGRAM

According to Section 21081.6 of the Public Resources Code, the California Environmental Quality Act requires that when a public agency is making the findings required by Sections 21081, the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted to mitigate or avoid significant effects on the environment.

Metro, through its governing Board, hereby finds that the Mitigation Monitoring and Reporting Program meets the requirements of Section 21081.6 of the Public Resources Code by providing a monitoring program designed to ensure compliance during project implementation with mitigation measures adopted by Metro.

SECTION VII

FINDINGS REGARDING LOCATION AND CUSTODIAN OF DOCUMENTS

Section 15091(e) of the California Code of Regulations, California Environmental Quality Act Guidelines, requires the public agency to specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which the decision is based. Chapter 7.0 of the EIR contains a list of all references used in the preparation of the environmental analysis. Unless otherwise noted, reference materials are located at Metro, which shall also serve as the custodian of the documents constituting the record of proceedings upon which Metro's Board of Directors has based its decision related to the project. The designated location and custodian of documents is as follows:

Los Angeles County Metropolitan Transportation Authority (Metro)
Attention: Elizabeth Carvajal
One Gateway Plaza, M/S 99-23-4
Los Angeles, CA 90012
Email: carvajale@metro.net

SECTION VIII

CERTIFICATION REGARDING INDEPENDENT JUDGMENT

Pursuant to Section 21082.1(c) of the Public Resources Code, Metro certifies that the Metro Board of Directors, as the governing board for Metro, has independently reviewed and analyzed the Final Environmental Impact Report (EIR). Metro, Department of Countywide Planning & Development, Transit Oriented Communities, reviewed the Draft EIR and supporting technical appendices and required changes to those documents prior to circulation for public review. The Draft EIR circulated for public review reflected the independent judgment of Metro. The Final EIR similarly has been subject to review and revision by the Metro staff and reflects the independent judgment of Metro.

SECTION IX

STATEMENT OF OVERRIDING CONSIDERATIONS

Section 15093 of the State California Environmental Quality Act (CEQA) Guidelines allows for overriding considerations where “economic, legal, social, technological or other benefits, including region-wide or statewide environmental benefits” outweigh the unavoidable environmental impacts, or unavoidable significant adverse effects, of the recommended project. The Los Angeles Union Station Forecourt and Esplanade Improvements Project (project) has been designed to reestablish a safe intuitive connection between Los Angeles Union Station (LAUS) and the surrounding historic and culturally significant communities by removing the barriers that inhibit walking and biking as a means of travel. Typical barriers of first/last mile connections to transit include poor sidewalks, safety, recognizability of transit stops, and street configurations that discourage active transportation.¹ In 2012, 27 percent and 5 percent of all traffic fatalities involved pedestrians and cyclists, respectively, in the Southern California Association of Governments (SCAG) Region, which includes Los Angeles.² SCAG set a target of increasing pedestrian trips in very urban areas from 16.7 percent in 2012 to 22.4 percent in 2040.³ SCAG set a corresponding target of increasing bike trips in very urban areas from 1.4 percent in 2012 to 3.4 percent in 2040.⁴ The City of Los Angeles, through the Mobility Plan 2035, a General Plan Element, has the following targets in place:⁵

- Vision Zero: Decrease transportation related fatality rate to zero by 2035.
- Ensure that 80 percent of street segments do not exceed targeted operating speeds by 2035. (Refer to Complete Streets Design Guide for targeted operating speeds.)
- Increase the percentage of females* who travel by bicycle to 35 percent of all riders by 2035. (*The presence of females riding on a bikeway is typically cited as an indicator that the bikeway provides a safe and comfortable environment for less experienced riders.)

As evidenced in Figure 3.17-6, *Pedestrian Collisions*, of the EIR, the three nearest intersections to the western boundary of LAUS experience high levels of collisions between pedestrians and vehicles: Alameda/Arcadia, Alameda/Los Angeles Street, and Alameda/Cesar Chavez. As illustrated in Figure 3.17-5, *Bicycle Collisions*, of the EIR, two of these same intersections Alameda/Los Angeles Street, Alameda/Arcadia also experience collisions between vehicles and cyclists. The high level of collisions is an impediment to increasing the use of alternative modes of travel for first and last mile travelled. Additionally, two of the collisions at or adjacent to the Alameda Street/Los Angeles Street intersection were fatalities, and as a result, the City of Los Angeles identifies Alameda Street as part of the “High Injury Network” associated with

¹ Stephens, Josh. 14 June 2015. *Los Angeles Metro Tackles First Mile, Last Mile Problem*. California Planning and Development Report. Available at: <http://www.cp-dr.com/articles/node-3748>

² Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

³ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

⁴ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

⁵ City of Los Angeles Department of City Planning. Accessed 2 August 2017. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>

the Vision Zero initiative. Pedestrian safety improvements, such as those proposed by the project, are consistent with the goals of the Vision Zero initiative.

In accordance with this CEQA guidance for overriding considerations, the Los Angeles County Metropolitan Transportation Authority (Metro) Board of Directors, as the governing board for Metro, finds that related benefits of the recommended project outweigh the unavoidable adverse environmental impacts.

- **Social and Community Relevance:** Social and community enhancements through the provision of dedicated paths of travel for pedestrians, cyclists, and vehicles to reduce conflicts (collisions and injury to people and damage to property) is a benefit to existing and anticipated commuters and visitors that use Los Angeles Union Station (LAUS) to make connections to the surrounding neighborhoods, commercial areas, civic institutions, and employment centers.
- **Economic Potential:** Economic benefits by providing safe connections and path of travel between LAUS and surrounding businesses and employment centers that have the potential to increase overall activity at LAUS and surrounding areas, as well as short-term economic during design, construction, and operation of the recommended project.
- **Sustainable Facilities:** Sustainable facilities designed to reduce heat island impacts and protect surface water through the use of Best Management Practices and reduction in vehicle miles traveled (VMT).
- **Public Health Needs:** Public health benefits associated with making connections between LAUS and surrounding areas by making it easier and safe to walk and bike as an alternative mode of travel, which have documented public health benefits.

The EIR identified and evaluated impacts to aesthetics, agriculture and forestry resources, air quality, greenhouse gas emissions, biological resources, cultural resources (including tribal cultural resources), energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and services systems for their potential to result in significant impacts from construction, operation, and maintenance of the project. The EIR determined that the project will result in less than significant impacts related to: aesthetics, agriculture and forestry resources, air quality, greenhouse gas emissions, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, and utilities and services systems. With the implementation of the mitigation measures specified in the EIR, impacts to biological resources, cultural resources, and hazards and hazardous materials will be mitigated to below the level of significance. However, even after the integration of feasible avoidance measures into the project design, impacts to transportation and traffic will remain significant and unavoidable, requiring a Statement of Overriding Consideration.

IX.1 UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

While the EIR determined that the approved project (Alternative 3: Restricted Left Hand Turns from Los Angeles Street [aka Modified Partial Closure]) will result in no impacts or less than significant impacts for five of the six issue areas recommended for consideration by Appendix G of the State CEQA Guidelines, in relation to transportation and traffic. However, there will be significant and unavoidable impacts in relation to measures of effectiveness established by the City of Los Angeles for vehicular traffic only. Other transportation modes will not be significantly impacted by the project and, in the case of pedestrian and bicycle modes, will be substantially improved via the provision of enhanced crossings and facilities that

improve safety relative to the existing environment. The roadway repurposing envisioned in the approved project makes infeasible the measure that will be typically explored to reduce intersection delays, such as street widening or restriping to accommodate additional lanes, because they would be inconsistent with the project objectives. Therefore, the project requires a Statement of Overriding Consideration.

IX.1 Transportation and Traffic

Section 4.2.3, *Alternative 3*, of the EIR determined that the project will result in significant and unavoidable impacts to transportation and traffic for vehicle traffic only in relation to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system for vehicular travel, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. Specifically, significant impacts will occur to 11 study intersections and the US-101 Northbound Ramp/Arcadia Street & Alameda Street Freeway Ramp A (see Table 4.2.3-3, *Future with Alternative 3 [2029] LOS & Impact Analysis*, in the EIR). The project will not significantly impact any other transportation modes, and is expected to have a substantial positive benefit to pedestrian and bicycle circulation and safety. The approved project (Alternative 3) is expected to increase delay on Alameda Street between 15 seconds and 60 seconds in the peak direction during the peak period relative to existing travel times. During off-peak periods, the increase in delay experienced by motorists will be less.

Five of the project objectives are inconsistent with prioritizing vehicular travel over other modes of travel:

- Prioritize connectivity, convenience, and safety for the most vulnerable users (pedestrians, bicyclists, transit patrons and community stakeholders) to safely navigate to and from the project site.^{6,7}
- Advance desirable and accessible public space at the LAUS forecourt that creates a visually porous and permeable connection between Union Station and the surrounding historic and cultural communities.⁸
- Facilitate alternatives to driving by providing infrastructure that enables more walking and bicycling.⁹
- Enhance the safety and quality of pedestrian and bicycle connections between the station and El Pueblo Historic Monument, Father Serra Park, Olvera Street, and nearby business and neighborhoods.^{10,11}

⁶ City of Los Angeles Department of City Planning. Accessed 2 August 2017. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>

⁷ Los Angeles County Metropolitan Transportation Authority. 2015. *Connect US Action Plan*. Available at: https://media.metro.net/projects_studies/union_station/images/LAUSMP_Action_Plan_Final_100515.pdf

⁸ County of Los Angeles Department of Public Health. November 2014. *The Plan for a Healthy Los Angeles*. Available at: http://publichealth.lacounty.gov/place/docs/FINAL_CTG%20HIGHLIGHTS%20Plan%20for%20Healthy%20LA_Nov%202014.pdf

⁹ Los Angeles County Metropolitan Transportation Authority. June 2012. *Climate Action and Adaptation Plan*. Prepared by ICF International. Available at: http://media.metro.net/projects_studies/sustainability/images/Climate_Action_Plan.pdf

¹⁰ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

¹¹ City of Los Angeles. Accessed 8 July 2017. *Vision Zero. Los Angeles 2015-2025*. Available at: <http://visionzero.lacity.org/map/>

- Advance comprehensive planning for LAUS that leverages it as the major regional transportation hub, a destination, and one of the city's foremost landmarks.¹²

Due to inconsistency with these objectives, physical traffic capacity mitigation measures, such as widening roadway and intersections, are considered infeasible because roadway widening to accommodate additional turn lanes, through lanes, and so forth increases pedestrian crossing distances, which can lead to increased average vehicular speed and exposure to vehicle turning movements, potentially affecting pedestrian and bicyclist safety. Therefore, no feasible physical mitigation is identified. Signal timing modifications could partially mitigate project impacts in concert with other operational enhancements, which are incorporated into the approved project (Alternative 3), the EIR proposed project, and Alternative 2.

For freeway ramps, mitigation measures to address off-ramp queue exceedances typically include the following potential strategies:

- Off-ramp widening to provide additional queue storage
- Increase green time for the off-ramp to flush the queue more quickly on to city streets

The impacted off-ramp is physically constrained by the existing bus stop island immediately to the north of the ramp, and by a grade down to the US-101 southbound lanes south of the ramp. Additionally, widening the off-ramp, which is currently four lanes wide, is considered infeasible because it will be inconsistent with the project's objective to enhance pedestrian and bicycle facilities. Roadway widening to accommodate a fifth off-ramp lane will increase pedestrian crossing distances, which can lead to increases in average vehicular speed and exposure to vehicle turning movements, potentially affecting pedestrian and bicyclist safety. Therefore, no feasible physical mitigation is identified to mitigate this impact.

Increasing green time at this location for the off-ramp will worsen arterial intersection impacts on Alameda Street and connecting streets, because it will take green time away from Alameda Street. Due to the closely spaced arterial intersections, this further exacerbation of arterial queuing will worsen overall transportation network performance, and is therefore considered infeasible. Therefore, the impact is considered significant and unavoidable.

However, to develop concepts to enhance access to and performance of freeway ramps, as well as the safety of pedestrian and bicycle crossings at ramps, Metro, in consultation with Caltrans and the City of Los Angeles, has determined to pursue the preparation of a Project Study Report (PSR). The PSR is a more appropriate tool to evaluate the opportunities for feasible improvements to freeway ramp facilities around LAUS that are affected by recent past, current, and reasonably foreseeable projects that will define the future effects on regional facilities, rather than burdening this project, which has a limited contribution to the cumulative effects, with the burden of mitigating for the cumulative effects of regional and local projects.

The scope of the proposed PSR would be limited to a defined study regarding access at the intersection for the ExpressLanes/El Monte Busway. The goals for the project include improving pedestrian safety at the Alameda Street/Arcadia Street intersection, as well as improving access for all modes (including for vehicles accessing the ExpressLanes). The study could encompass an evaluation of Alameda Street, Los Angeles

¹² City of Los Angeles Department of City Planning. Accessed 2 August 2017. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>, Policy 3.6, p. 88.

Street, Vignes Street, and Commercial Street ramps as part of achieving these goals. The authorization for Metro funding is limited to the proposed preliminary PSR. Any subsequent studies and/or resulting actions are not part of this initial commitment by Metro and would need to be discussed by the relevant public agencies.

The approved project will not result in significant impacts to transportation and traffic in relation to resulting in a substantial disruption to traffic during construction; conflicting with an applicable congestion management program; resulting in a change in air traffic patterns; substantially increasing hazards due to a design feature or incompatible uses; resulting in inadequate emergency access; or conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. However, even after the integration of feasible avoidance measures into the project design, impacts to transportation and traffic in relation to vehicular delay will remain significant and unavoidable. There will be no significant impacts to other transportation modes, and there are substantial positive benefits for pedestrian and bicycle circulation.

IX.2 OVERRIDING CONSIDERATIONS

Metro has determined that the social and community relevance, economic potential, sustainable facilities, and public health needs–related benefits of implementing the project, when balanced against the limited unavoidable adverse effects of the project, cause those effects remaining after mitigation to be acceptable due to several considerations. Of particular importance is the ability to provide safe paths of travel for pedestrians and cyclists. Over 15,000 pedestrians and cyclists per day are expected to use the project. Furthermore, the project offers significant opportunities and benefits that are not currently accessible or available in the surrounding community.

LAUS currently supports a variety of public transportation services for local, regional, and inter-city travel. LAUS is also a hub for Metro’s extensive light rail and subway service network, with the Red, Gold, and Purple Lines converging there. The Metro rail network further extends via the Blue, Green, and Expo Lines.

In addition to Metro bus and rail options, Metrolink, Amtrak, LAX Flyaway Bus, and others utilize LAUS for regional rail commuters and airport travelers. The Metro local bus service includes routes to/from downtown Los Angeles, east/west and north/south routes in other parts of Los Angeles County, a 24-hour Owl Service, local shuttles, and several express or rapid service buses (such as the Silver Line). The facilities that support these services are primarily the existing rail lines and Patsaouras Bus Plaza on the east side of the station.

According to a 2015 Metro Transforming LAUS Summary Report, there are approximately 116,000 passenger trips through LAUS each weekday.¹³ Metro anticipates that continued increases in regional population and employment will nearly double the demand on existing and planned modes of transportation, resulting in over 200,000 passenger trips through LAUS each weekday by 2040.

The project will help to improve safety and serve current users and the anticipated increase in pedestrian and bicycle demand at the station in the future.

¹³ Los Angeles County Metropolitan Transportation Authority. 9 October 2015. Transforming Los Angeles Union Station. Available at: https://media.metro.net/projects_studies/union_station/images/LAUS_Design_Report-Final_10-9-15.pdf

Additionally, the project will enhance pedestrian and bicycle safety by providing improvements to pedestrian and bicycle facilities. Several motor vehicle/pedestrian collisions have occurred on Alameda Street in front of Union Station, including two pedestrian fatalities that occurred in a five-year period. Given this history, Alameda Street, including in front of Union Station, is on the City of Los Angeles' Vision Zero "High-Injury Network." The pedestrian and bicycle elements of the project are consistent with the City of Los Angeles' Vision Zero initiative, and will enhance safety and the walking and biking environment in front of the station for existing and future users.

IX.2.1 Social and Community Relevance

Recognizing the importance of LAUS and its proximity to historic and culturally significant communities like El Pueblo, Chinatown, and Little Tokyo as well as employment centers and civic institutions, the project social and community benefits are twofold: (1) reduce collisions between pedestrians, cyclists, and vehicles by providing dedicated well-organized paths of travel; and (2) safely accommodate existing and anticipated future levels of use. The project provides an expanded pedestrian and bicyclist multi-use esplanade on the east side of Alameda Street and widened sidewalks on the west side of Alameda Street. Additionally, the project includes a new expanded, raised pedestrian crossing that leads into a new pedestrian plaza that includes a two-way off-street bicycle path through the expanded El Pueblo plaza area near the west side of Los Angeles Street. The primary purpose of the project is to improve safety of the most vulnerable users while balancing all travel modes. Making the public realm safer and more inviting for people to walk and bike between LAUS and Little Tokyo/Arts District to the south, and Chinatown/Cornfield Arroyo Seco to the north, is a key goal for Metro and the City in advancing policy initiatives that promote holistic transportation, sustainability, and public health. The environmental evaluation process was informed by a robust, community-driven process. The project re-envisioned the historic LAUS and the surrounding streets as a means of accommodating alternative modes of travel to and from the campus, providing important community-prioritized connections to and within some of the most culturally and historically significant communities in downtown Los Angeles in a manner that protects and enhances the status of the LAUS as a historic resource.

Built in 1939, LAUS combines Spanish Colonial Revival architecture, Mission Revival and Streamline Moderne styles. Originally intended as a transcontinental terminus station for the Union Pacific, Santa Fe, and Southern Pacific Railways, the station was a major hub for troop movement during World War II. The project site includes the viewshed of the west façade of the historic Union Station Terminal, a sidewalk and paved fire access road along the west façade, landscaped planters flanking the north and south pedestrian paths and a historic entry plaza with sundial leading to the main entrance of the historic Union Station Terminal, a sidewalk along the parking lot and eastern façade of the La Petite Academy/First 5 LA building, and a paved parking lot at LAUS.

LAUS was listed in the National Register of Historic Places on November 13, 1980, under Criterion C, and is significant on the national level.¹⁴ It was designated as a Los Angeles Historic Cultural Monument (HCM No. 101) on August 2, 1972. The Monument boundary includes the project site, whereas the National Register nomination does not. Beginning in the 1970s, growing use of Amtrak and expansion of local and regional rail revitalized the station as a major transportation hub. The station was restored in 1992. Metro acquired the station in 2011, managing the property that currently serves as a transportation hub for Metro, Metrolink,

¹⁴ National Park Service. 1980. *National Register of Historic Places Inventory Nomination Form*. Available at: <https://npgallery.nps.gov/GetAsset?assetID=c72efa93-90ca-40ba-9ca6-ae3d3515cf37>

Amtrak, and other transportation services as well as an urban mixed-use development site. Adjacent downtown Los Angeles communities and historic places like El Pueblo, Civic Center, Chinatown, Little Tokyo, the Arts District, Los Angeles River, and Boyle Heights are within walking and biking distance and are important destinations to and from LAUS.

With the goal of improving passenger safety and connectivity to meet current and future needs and formalize linkages to adjacent neighborhoods and the larger urban network of civic spaces, the project will improve the pedestrian, cycling, and vehicular environment. Consistent with the goals of the *City Mobility Plan 2035* and *Connect US Action Plan*, the project facilitates connectivity, convenience, and safety for the most vulnerable users (pedestrians, transit patrons and community stakeholders) by

- Narrowing the roadway and implementing esplanades on Alameda Street for mixed use by pedestrians and cyclists on the east side of the street and widened sidewalks on the west side of the street
- Narrowing the roadway on Los Angeles Street and widening the plaza on the north side of the intersection
- Creating a direct, intuitive crossing from LAUS to El Pueblo through a raised pedestrian consolidated crossing to facilitate safe crossing of Alameda Street into Los Angeles Street and El Pueblo
- Implementing a two-way off-street bicycle path through the expanded El Pueblo plaza area (contingent on Caltrans approval) near the west side of Los Angeles Street^{15,16}
- Reducing pedestrian and bicyclist crossing distances
- Elevating pedestrian and bicyclist visibility across Alameda Street
- Providing motorists with visual cues that the right-of-way is shared and that pedestrians and bicyclists will be crossing in front of the station

Additionally, the approximately 60-space parking lot in front of LAUS will be redeveloped as a forecourt to serve as a civic space, with sustainable features. The project will replace a parking lot with limited capacity with a forecourt that will serve as a desirable and accessible public civic space and that will create a visually porous and permeable connection between LAUS and the surrounding historic and cultural communities. The forecourt will be used for an array of Metro Art Presents events.

IX.2.2 Economic Potential

The economic benefits of the project are related to the creation of construction jobs, investment near transit, improved connections to existing and established employment centers, and revitalization of an underutilized space.

The project will provide the potential for construction jobs that could stimulate stability and growth in an economically challenged area. There are currently 9,940 active businesses and 15 museums and cultural institutions within one mile of the project area. The connection between LAUS and El Pueblo is critical for pedestrians, bicyclists, and transit patrons as these stakeholders have identified El Pueblo as the lynchpin

¹⁵ City of Los Angeles Department of City Planning. Accessed 2 August 2017. *Mobility Plan 2035*. Available at: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>

¹⁶ Los Angeles County Metropolitan Transportation Authority. 2015. *Connect US Action Plan*. Available at: https://media.metro.net/projects_studies/union_station/images/LAUSMP_Action_Plan_Final_100515.pdf

connection to and from LAUS and the compass point to the surrounding communities of Chinatown, Little Tokyo, the Arts District, Civic Center, and the Cornfields/Arroyo Seco neighborhood. The project will increase access to business and transit as well as provide opportunities for physical activity by providing a safer crossing to LAUS.

As discussed in the EIR, the community surrounding the project site is growing, which is in line with SCAG's housing and population projections. The project area is located in a SCAG Compass Blueprint 2% Strategy Area, and the active transportation proposals are in line with Blueprint goals of promoting redevelopment, focusing growth along major transportation corridors, near a major transit station, with a variety of travel choices. This designation encourages development in identified areas throughout the county. To date, Metro has secured approximately \$19 million in funding to implement the project; this will result in transformational change that can further spur economic development and investments in the area.

Furthermore, the modern and sustainable development will replace a surface parking lot with a state-of-the-art civic space, which will also contribute to and highlight the aesthetics of the campus.

IX.2.3 Sustainable Facilities

The sustainability benefits of the project are related to inclusion of sustainability features in the design of the project and reduction in VMT. As part of its mobility plan, SCAG has set a target of reducing daily per capita VMT from the 2012 base year level 21.5 daily VMT to 18.4 daily VMT in 2040. This target relies on multiple strategies including increasing active transportation. In the absence of increased active transportation, travel delays in Los Angeles County would be expected to increase from 14.7 minutes per day in 2012 to 16.4 minutes in 2040. However, the ability to increase active transportation is expected to reduce the daily delay per capita from 14.7 minutes in 2012 to 11.5 minutes in 2040.

The project will enhance the safety and quality of pedestrian and bicycle connections between LAUS and El Pueblo Historic Monument and nearby business and neighborhoods consistent with identified strategies in the SCAG 2016–2040 RTP/SCS. Increased use bicycles and walking is consistent with the stated objectives of the RTP/SCS of reducing per capita VMT.^{17,18}

The project would comply with all requirements described in the City's National Pollutant Discharge Elimination System (NPDES) Development Planning Program and would incorporate Best Management Practices (BMPs) in accordance with the City's Low Impact Development (LID) Ordinance and Standard Urban Stormwater Management Plan (SUSMP). The Alameda Street Esplanade has been designed to reduce the total area of impermeable surface and includes replacing 15 existing trees with 69 new trees, for a net gain of 54 trees, thus increasing the total permeable area between Caesar Chavez Street and Arcadia Street by approximately three times. Similarly, the design of the Forecourt element of the project includes replacement of the majority of the existing concrete and paved surfaces with permeable materials such as granite and porous paving materials, including porphyry pavers and porous concrete or comparable materials, to promote a porous ground plane. Other water-conserving devices such as bioswales and subsurface water retention facilities may also be used in conjunction with the landscape elements of the

¹⁷ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscsc.net/Documents/2016/final/f2016RTPSCS.pdf>

¹⁸ City of Los Angeles. Accessed 8 July 2017. *Vision Zero. Los Angeles 2015-2025*. Available at: <http://visionzero.lacity.org/map/>

forecourt. Therefore, the project would maintain or improve water quality by enhancing on-site infiltration of storm water (within Metro property), consistent with the goals of the City's NPDES Development Planning Program.

The project advances sustainability by providing for reduced consumptive water use in a cost-effective manner consistent with the provisions of Metro's Water Action Plan and improving safe multi-modal facilities that encourage active transportation and reduction in VMT.¹⁹

IX.2.4 Public Health Needs

Research has shown a correlation between driving and obesity rates. In a study of 33 California cities, adults who drove the most had obesity rates (27 percent) that were three times higher than those who drove the least (9.5 percent).²⁰ Further connections were drawn between land use patterns and public health. Residents of more walkable neighborhoods were twice as likely to meet physical activity guidelines as residents of neighborhoods with low walkability.²¹

The pedestrian and cycling improvements facilitate alternatives to driving by providing infrastructure that enables more walking and bicycling consistent with the objectives of the City of Los Angeles' *Plan for a Healthy Los Angeles (PHLA)* and Metro's *Climate Action and Adaptation Plan*.^{22,23} The PHLA introduced a General Plan policy that directs the City to advance active transportation improvements as foundational to health and healthy communities: "Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure deficiencies that threaten the health, safety, and well-being of the most vulnerable users."²⁴

In accordance with SCAG's 2016–2040 RTP/SCS, public transit users are more likely to meet Surgeon General recommendations for physical activity. Greater health benefits can be achieved by increasing the amount (duration, frequency, or intensity) of physical activity.

"Today, many people in our region suffer from poor health due to chronic diseases related to poor air quality and physical inactivity. Chronic diseases including heart disease, stroke, cancer, chronic lower respiratory disease and diabetes are responsible for 72 percent of all deaths in our region,

¹⁹ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscsc.net/Documents/2016/final/f2016RTPSCS.pdf>

²⁰ Lopez-Zetina, J., Lee, H., and Friis, R. 2006. The Link between Obesity and the Built Environment. Evidence from an Ecological Analysis of Obesity and Vehicle Miles of Travel in California. *Health & Place* 12(4):656-664.

²¹ Frank, L.D., Schmid, T.L., Sallis, J.F., Chapman, J., and Saelens, B.E. 2005. Linking Objectively Measured Physical Activity with Objectively Measured Urban Form. Findings from SMARTRAQ. *American Journal of Preventive Medicine* 28(2S2):117-125.

²² County of Los Angeles Department of Public Health. November 2014. *The Plan for a Healthy Los Angeles*. Available at: http://publichealth.lacounty.gov/place/docs/FINAL_CTG%20HIGHLIGHTS%20Plan%20for%20Healthy%20LA_Nov%202014.pdf

²³ Los Angeles County Metropolitan Transportation Authority. June 2012. *Climate Action and Adaptation Plan*. Prepared by ICF International. Available at: http://media.metro.net/projects_studies/sustainability/images/Climate_Action_Plan.pdf

²⁴ County of Los Angeles Department of Public Health. November 2014. *The Plan for a Healthy Los Angeles*. Available at: http://publichealth.lacounty.gov/place/docs/FINAL_CTG%20HIGHLIGHTS%20Plan%20for%20Healthy%20LA_Nov%202014.pdf

according to the California Department of Public Health. Furthermore, more than 60 percent of residents are overweight or obese, more than eight percent have diabetes, 27 percent suffer from hypertension and more than 12 percent suffer from asthma, according to the California Health Interview Survey. Health care costs resulting from being physically inactive, obese and overweight and from asthma cost our Southern California region billions of dollars annually in medical expenses, lost life and lost productivity, research shows. For example, one study showed that health care costs resulting from physical inactivity and obesity reached an estimated \$41.2 billion in 2006 in California.

“A growing body of evidence shows that how a neighborhood is laid out and linked to transportation options can shape the lifestyles that people have—how physically active they are and how safe their everyday lives can be. As a result, regional planning for land use and transportation across the U.S. has increasingly incorporated strategies to improve public health.”²⁵

As Metro and the larger region continue to advance the expansion of a robust and interconnected public transportation system, it is imperative that planning and implementation of the system include connections from transit to where people are and where they want to go. The benefits of public transportation do not solely reside with improved mobility, but they are far more holistic in connecting people to community, improved sustainability, economic vibrancy, and public health. This project will improve safety, public health, active transportation, transit infrastructure, and ultimately quality of life for the communities surrounding LAUS.

²⁵ Southern California Association of Governments. April 2016. *Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. Available at: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>

SECTION X
SECTION 15091 FINDINGS

Based on the foregoing findings and the information contained in the record, the Los Angeles County Metropolitan Transportation Authority (Metro) Board of Directors has made the following findings with respect to the significant impacts on the environment resulting from the Los Angeles Union Station Forecourt and Esplanade Improvements Project (project) pursuant to Section 15091 of the State California Environmental Quality Act (CEQA) Guidelines.

- Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effects as identified in the Final Environmental Impact Report (EIR).
- The changes and alterations are within the responsibility and jurisdiction of Metro and the City of Los Angeles. The Metro Board of Directors, as the governing board for Metro, may implement certain measures as part of pre-construction, construction, and post-construction activities. Pursuant to Section 15091(c) of the State CEQA Guidelines, the Mitigation Monitoring Program identifies responsible agencies for the mitigation measures.
- The mitigation measures identified in the Final EIR are feasible and will be required as conditions of approval.

Based on the foregoing findings and the substantial evidence contained in the record, and as conditioned by the foregoing findings:

- All significant effects on the environment due to the project have been eliminated or substantially lessened where feasible.
- Any remaining significant effects on the environment found to be unavoidable are acceptable due to the overriding concerns set forth in the foregoing Statement of Overriding Considerations.