



Expo

Exposition Metro Line
Construction Authority

707 Wilshire Boulevard
34th Floor
Los Angeles, CA 90017

213.243.5500
BuildExpo.org

6.d

DATE: MARCH 18, 2011

TO: BOARD OF DIRECTORS

**FROM: RICHARD D. THORPE
CHIEF EXECUTIVE OFFICER**

**ACTION: DIRECTION ON THE SEPULVEDA GRADE SEPARATION
DESIGN OPTION AND THE WESTWOOD NO PARKING DESIGN
OPTION**

RECOMMENDATION

- A. Receive Board Direction on the possible addition of the Sepulveda Grade Separation Design Option, contingent upon the City of Los Angeles funding the cost, and the Westwood No Parking Design Option.
- B. Contingent upon Board direction, Adopt Resolution No. 11 (Attachment A) to approve the Sepulveda Grade Separation Design Option and the Westwood No Parking Design Option as part of the project, approval of findings, Mitigation Monitoring and Reporting Program, and Statement of Overriding Considerations under the California Environmental Quality Act.

SUMMARY

When the Exposition Metro Line Construction Authority (Authority) Board certified the Final Environmental Impact Report (FEIR) in February, 2010, the Board approved an at-grade crossing and station at Sepulveda, and a park and ride lot at the Westwood Station, as part of the baseline project. The FEIR environmentally cleared a No Parking option at the Westwood Station and a Grade Separation and Aerial Station option at Sepulveda. At the time, the Board directed staff to include the Sepulveda Grade Separation and the Westwood Station No Parking options as part of preliminary engineering. Staff also requested that the two contractors include cost differentials for these two options as part of their bids.

Staff is requesting direction from the Board on the inclusion of these two options as part of the project. If the Board directs staff to include these options as part of the project, the attached Resolution will need to be adopted by the Board. Once adopted, these options will be included as part of the Design-Build Contract.

DISCUSSION

When the Board certified the FEIR in February, 2010, the baseline project included an at-grade crossing and station at Sepulveda, and a park and ride lot at the Westwood Station. However, the FEIR also environmentally cleared a grade separation and aerial station at Sepulveda, and a No Parking option at the Westwood Station. The Board asked staff to include these two options as part of preliminary engineering. The two Design-Build Contractors who performed preliminary engineering, did include these two options as part of their preliminary engineering designs. They also included the cost differential for these two options as part of their bids. The selected Design-Build Contractor's bid included a \$5,278,935 million cost differential to add the Sepulveda Grade Separation Option. A cost savings of \$79,360 was negotiated to implement the Westwood Station No Parking design option.

The City Council of the City of Los Angeles is considering a motion authored by Councilmen Koretz and Rosendahl, which if approved, would commit to funding the \$5,278,935 million cost differential to add the Sepulveda Grade Separation option to the project. Authority staff is requesting Board direction on the inclusion of these two options as part of the project. These two options are described in detail in the FEIR and are included in the preliminary engineering documents.

Should the Board direct staff to add these two options to the project, the Board should adopt the findings as detailed in the Resolution provided in Attachment A. These findings state that these two design options were evaluated as part of the FEIR, that the FEIR was distributed to commenting agencies and made available to agencies and members of the public, that the Findings of Fact, Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program, with regard to the two design options (previously adopted as part of the February, 2010 Board actions on the Project) are re-adopted and incorporated by reference.

FINANCIAL IMPACT

The City of Los Angeles is considering paying for the cost differential to add the Sepulveda Grade Separation option as a Betterment to the project in an amount not-to-exceed \$5,278,935 million. Should the City of Los Angeles pay the differential cost to add the Sepulveda Grade Separation, there would be no net impact to the project budget. There is a cost savings of \$79,360 associated with the implementation of the Westwood Station No Parking design option. The \$79,360 savings would remain as part of the overall project budget.

NEXT STEPS

Should the Board approve the Resolution shown in Attachment A, the design options will be added to the Design-Build Contract, contingent on a funding commitment by the City of Los Angeles.

ATTACHMENT(S)

- A. Resolution adopting the Sepulveda Grade Separation option and Westwood Station No Parking option
- B. Findings of Fact, Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program (adopted by the Board in February, 2010)

RESOLUTION NO. 11

**A RESOLUTION OF THE BOARD
OF THE EXPOSITION METRO LINE CONSTRUCTION AUTHORITY
REGARDING THE EXPOSITION CORRIDOR TRANSIT PROJECT PHASE 2
ADOPTING
THE SEPULVEDA GRADE SEPARATION DESIGN OPTION AND
THE EXPO/WESTWOOD STATION NO PARKING DESIGN OPTION**

March ____, 2011

On motion of Board Member _____, duly seconded and carried, the following resolution was adopted:

WHEREAS, the Exposition Metro Line Construction Authority (“Authority”) prepared and circulated for public review and comment a draft environmental impact report evaluating the Project and alternatives to the Project in accordance with the California Environmental Quality Act (“CEQA”); and

WHEREAS, the Authority held numerous other consultations and meetings concerning the Project; and

WHEREAS, the Final Environmental Impact Report (State Clearing House Number: 2007021109) (the “FEIR”) evaluated certain design options regarding the Project; and

WHEREAS, two of the design options evaluated in the FEIR are the “Sepulveda Grade Separation” design option and the “Expo/Westwood Station No Parking” design option; and

WHEREAS, the FEIR was distributed to commenting agencies and made available to other agencies and to members of the public; and

WHEREAS, on February 4, 2010, the Authority Board certified that the FEIR was completed in compliance with CEQA; and

WHEREAS, on February 4, 2010, the Authority Board adopted Findings of Fact for the Final Environmental Impact Report of the Exposition Corridor Transit Project Phase 2 Los Angeles, Culver City, and Santa Monica, California (“Findings of Fact”), the Statement of Overriding Considerations, and the Mitigation Monitoring and Reporting Program, all of which addressed the “Sepulveda Grade Separation” design option and the “Expo/Westwood Station No Parking” design option; and

WHEREAS, the Authority conducted a duly noticed public meeting and heard evidence from all persons interested in testifying concerning the adoption of the

“Sepulveda Grade Separation” design option and the “Expo/Westwood Station No Parking” design option; and

WHEREAS, the Authority Board has reviewed and considered the FEIR and the oral and written comments on the FEIR, the report of the staff of the Authority, and other information in the administrative record regarding the “Sepulveda Grade Separation” design option and the “Expo/Westwood Station No Parking” design option:

NOW, THEREFORE, the Exposition Metro Line Construction Authority Board resolves as follows that:

1. The foregoing recitals are true and correct.
2. Pursuant to California Public Resources Code section 21166, no subsequent or supplemental environmental impact report is required for the “Sepulveda Grade Separation” design option or the “Expo/Westwood Station No Parking” design option. The FEIR evaluated the environmental effects of the design options and no revisions to the FEIR are required.
3. The “Sepulveda Grade Separation” design option as described in the FEIR is selected and adopted.
4. The “Expo/Westwood Station No Parking” design option as described in the FEIR is selected and adopted.
5. The Findings of Fact as they refer to the “Sepulveda Grade Separation” design option and the “Expo/Westwood Station No Parking” design option are hereby readopted and incorporated herein by reference.
6. The Statement of Overriding Considerations is hereby readopted and incorporated herein by reference.
7. The mitigation measures described in the FEIR and in the Mitigation Monitoring and Reporting Program with regard to the “Sepulveda Grade Separation” design option and the “Expo/Westwood Station No Parking” design option are hereby adopted and incorporated herein by reference.
8. If any section, paragraph or provision of this Resolution shall be held to be invalid or unenforceable for any reason, the invalidity or unenforceability of such section, paragraph or provision shall not affect any remaining provisions of this Resolution.
9. This Resolution shall take effect from and after its adoption.

PASSED AND ADOPTED this ____ day of March, 2011, by the following vote:

AYES: ()

NOES: ()

ABSENT: ()

HERB J. WESSON, CHAIR
EXPOSITION METRO LINE CONSTRUCTION AUTHORITY

ATTEST:

JUANITA MURRY
BOARD SECRETARY

Findings of Fact

For

**THE FINAL ENVIRONMENTAL IMPACT REPORT OF
THE EXPOSITION CORRIDOR TRANSIT PROJECT PHASE 2
LOS ANGELES, CULVER CITY, AND SANTA MONICA, CALIFORNIA**

STATE CLEARINGHOUSE NUMBER: 2007021109

Prepared Pursuant to the
Sections 15091 and 15093 of the State CEQA Guidelines and Section 21081 of the Public
Resources Code

By the

EXPOSITION METRO LINE CONSTRUCTION AUTHORITY

February 2010

THE EXPOSITION CORRIDOR TRANSIT PROJECT PHASE 2
Exposition Metro Line Construction Authority
Monica Born, P.E., Project Director
707 Wilshire Boulevard
Suite 3400
Los Angeles, CA 90017
Fax: 213-243-5553
Email: Phase2@exporail.net
Online at: BUILDEXPO.ORG

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1. INTRODUCTION

1.1 Overview and Organization

This document presents the Findings of Fact for the Final Environmental Impact Report (FEIR) of the Exposition Corridor Transit Project Phase 2 (Expo Phase 2 or Project). The content and format of the Findings of Fact are designed to meet the requirements of the *California Environmental Quality Act* (CEQA).^{1,2} The Project incorporates various design requirements, performances standards, and other features that reduce the environmental effects of the Project. The FEIR for the Expo Phase 2 Project identifies significant environmental effects that would result from the implementation of the Expo Phase 2 project (Project). For each significant effect of the Project identified in the FEIR, the Exposition Metro Line Construction Authority (Authority) is adopting one or more of the findings as provided in CEQA and specified in Section 15091 of the Title 14 of the California Code of Regulations (CEQA Guidelines). For most significant effects, the Authority finds that the mitigation measures identified in the FEIR and adopted by the Authority avoid or substantially lessen the significant effects to a level of less than significance. As provided in Section 15093 of the CEQA Guidelines, the Authority is balancing the economic, legal, social, technological, or other benefits of the Project against the unavoidable environmental effects. With regard to those unavoidable effects, the Authority is adopting a Statement of Overriding Considerations.

The Authority also adopts a Mitigation Monitoring and Reporting Plan (MMRP) for the Project. The Authority finds that the MMRP, which is incorporated by reference and made a part of these findings, meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the Project.

Pursuant to Public Resources Code Section 21082.1(c)(3), the Authority finds that the FEIR reflects the Authority's independent judgment as the Lead Agency for the Project.

The Findings of Fact are organized into the following sections:

- **Section 1: Introduction**—Outlines the organization of this document and identifies the location and custodian of the record of proceedings.
- **Section 2: Environmental Setting and Project Description**—Describes the location and characteristics of the Project, Project description, and Project goals and objectives.
- **Section 3: No Environmental Effects; Less-Than-Significant Environmental Effects without Mitigation Measures**—Provides a summary of the environmental issue areas that were determined not to be significant or less than significant.
- **Section 4: Less-Than-Significant Environmental Effects; Mitigation Incorporated**—Identifies and summarizes the potentially significant environmental effects for which implementation of identified feasible mitigation measures would avoid or substantially reduce the environmental effects to a less-than-significant level.

¹ California Environmental Quality Act (CEQA), Public Resources Code (PRC), §21000 et al., 2007.

² CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, §15000 et al., 2007 (CEQA Guidelines).

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- **Section 5: Significant and Unavoidable Environmental Effects**—Identifies and summarizes the significant and unavoidable environmental effects that cannot be mitigated to a less-than-significant-level, even after all feasible mitigation measures to reduce the environmental effects have been incorporated into the Project.
 - **Section 6: Findings Regarding Project Alternatives**—Highlights the alternatives considered for the Project, as well as provides a brief discussion of the Project’s compliance with CEQA Guidelines regarding the adoption of a program for monitoring and reporting mitigation measures. The Mitigation Monitoring and Reporting Program is incorporated by reference and available under separate cover.

The Statement of Overriding Considerations is also incorporated by reference and is provided under separate cover.

1.2 Statutory Requirements

CEQA (Public Resources Code Section 21081 et seq.), and particularly the CEQA Guidelines (Guidelines) (14 California Code Regulations, Section 15091 et seq.), require that:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Referred to herein as “Finding 1”)
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (Referred to herein as “Finding 2”)
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (Referred to herein as “Finding 3”)

For those significant effects that the agency determines are not feasible to mitigate to a less-than-significant level, the public agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment (see, Public Resource Code Section 21081(b)). The Guidelines state in Section 15093 that:

If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”

1.3 Records of Proceedings

For purposes of CEQA and these Findings of Fact, the records of proceedings for the Authority’s decisions on the Light-Rail Transit (LRT) Alternatives consist of: (a) matters of common knowledge to the Authority, including, but not limited to, federal, state and local laws

and regulations and policies (b) the following documents, which are in custody of the Exposition Metro Line Construction Authority, 707 Wilshire Boulevard, Suite 3400, Los Angeles, CA 90017 during the design and construction phases of the Project and then at the Los Angeles County Metropolitan Transportation Authority, One Gateway Plaza, Records Management, MS 99PL-5, Los Angeles, CA 90012 thereafter:

- Notice of Preparation (NOP) and other public notices issued by the project applicant in conjunction with the proposed project;
- Draft Environmental Impact Report (DEIR), dated January 2009;
- All testimony, documentary evidence, and all correspondence submitted in response to the DEIR by agencies or members of the public during the public comment period on the DEIR and responses to those comments (Volume II of the FEIR);
- Final Environmental Impact Report, dated December 2009 (Volume 1 of the FEIR) including all appendices thereto and those documents incorporated therein by reference;
- Mitigation Monitoring and Reporting Program (MMRP), dated February 2010;
- All findings, statements of overriding consideration, and resolutions adopted by the Authority in connection with proposed project, and all documents cited or referred to therein;
- All final technical reports and addenda, studies, memoranda, maps, correspondence, and all planning documents prepared by the Authority, project applicant, or the consultants to each, relating to the project;
- All documents submitted to the Authority by agencies or members of the public in connection with development of the proposed project;
- All actions of the Authority Board of Directors with response to the Project;
- All references included in Appendix B (Bibliography) of the FEIR;
- Applicable local general plans, transportation plans and transportation improvement programs and related environmental analyses;
- Meeting agenda, minutes and staff reports of the Authority; and
- Other documents regarding coordination and consultation with the public and public agencies and other documents designated by the Authority.

1.4 Identification of Environmental Setting for Use in Determining Significance of Effects of the Project

The CEQA Guidelines require environmental impact reports to include a description of the physical environmental conditions in the vicinity of the project and that “[t]his environmental setting will *normally* constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. (CEQA Guidelines, Section 15125, subd. (a), emphasis added). The CEQA Guidelines also provide that an “EIR shall discuss any inconsistencies between the proposed project and applicable general plans” and “[w]here a proposed project is compared with an adopted plan, the analysis shall examine the existing physical conditions... as well as the potential future conditions discussed in the plan.” (CEQA

Guidelines, Section 15125 subd.(d) and (e)). The Guideline quoted above does not mandate that a frozen snapshot of existing conditions be used.

As the Court of Appeal stated, “[t]he agency has the discretion to resolve factual issues and to make policy decisions. If the determination of a baseline condition requires choosing between conflicting opinions or differing methodologies, it is the function of the agency to make those choices based on all of the evidence. (*Save Our Peninsula Open Space Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 120).

Consistent with the CEQA Guidelines, the No-Build Alternative is defined to consist of the existing transit services as well as improvements explicitly committed to be constructed by the year 2030 as defined in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).³ Accordingly, this No-Build Alternative includes only transit service and roadway construction projects that are programmed and funded and would be expected to occur, independent of and regardless of whether one of the proposed Transportation Systems Management (TSM) or LRT Alternatives is approved. Of the various programmed construction improvements contained in the SCAG RTP, only the I-405 Widening (I-405 from the I-10 to US 101) and the Overland Avenue Bridge Widening (over I-10) involve potential changes to the physical environment of the Expo Phase 2 project study area.

In accordance with the CEQA Guidelines, the EIR evaluates the impacts of the project alternatives against existing conditions. The EIR also evaluates projected future traffic and air quality conditions with and without the project. This is necessary so that the public and the decision makers may understand the future impacts on traffic and air quality of approving and not approving the project. In this manner, the EIR evaluates both the impact of the project alternatives against current environmental conditions, as well as comparing the impacts of the project against projected future traffic and air quality conditions.

The evaluation of future traffic and air quality conditions utilizes adopted official demographic and projections for the project area and region. Past experience with the adopted demographic projections indicate that it is reasonable to assume that the population of the project area and the region will continue to increase over the life of the project. The projected population increases will, in turn, result in increased traffic congestion and increased air emissions from mobile sources in the project area and in the region.

For most of the environmental topics in the FEIR and in these Findings, the Authority finds that existing environmental conditions are the appropriate baseline condition for the purpose of determining whether an impact is significant. However, the Authority finds that the existing physical environmental conditions (current population and traffic levels) do not provide a reasonable baseline for the purpose of determining whether traffic and air quality impacts of the Project are significant. The Authority is electing to utilize the future baseline conditions for the purposes of determining the significance of impacts to traffic and air quality.

³ 2008 Regional Transportation Plan: Making the Connections, adopted May 2008.

2. ENVIRONMENTAL SETTING AND PROJECT DESCRIPTION

2.1 Expo Phase 2 Study Area

The Expo Phase 2 Project is located in the Westside of Los Angeles, extending approximately 7 to 8 miles (depending on the specific Alternative alignment) from the Expo Phase 1 terminus at the Venice/Robertson Station in Culver City to Santa Monica. The study area as described in the FEIR is generally bounded by Santa Monica and Pico Boulevards on the north, La Cienega Boulevard on the east, Washington Boulevard on the south and the Pacific Ocean on the west.

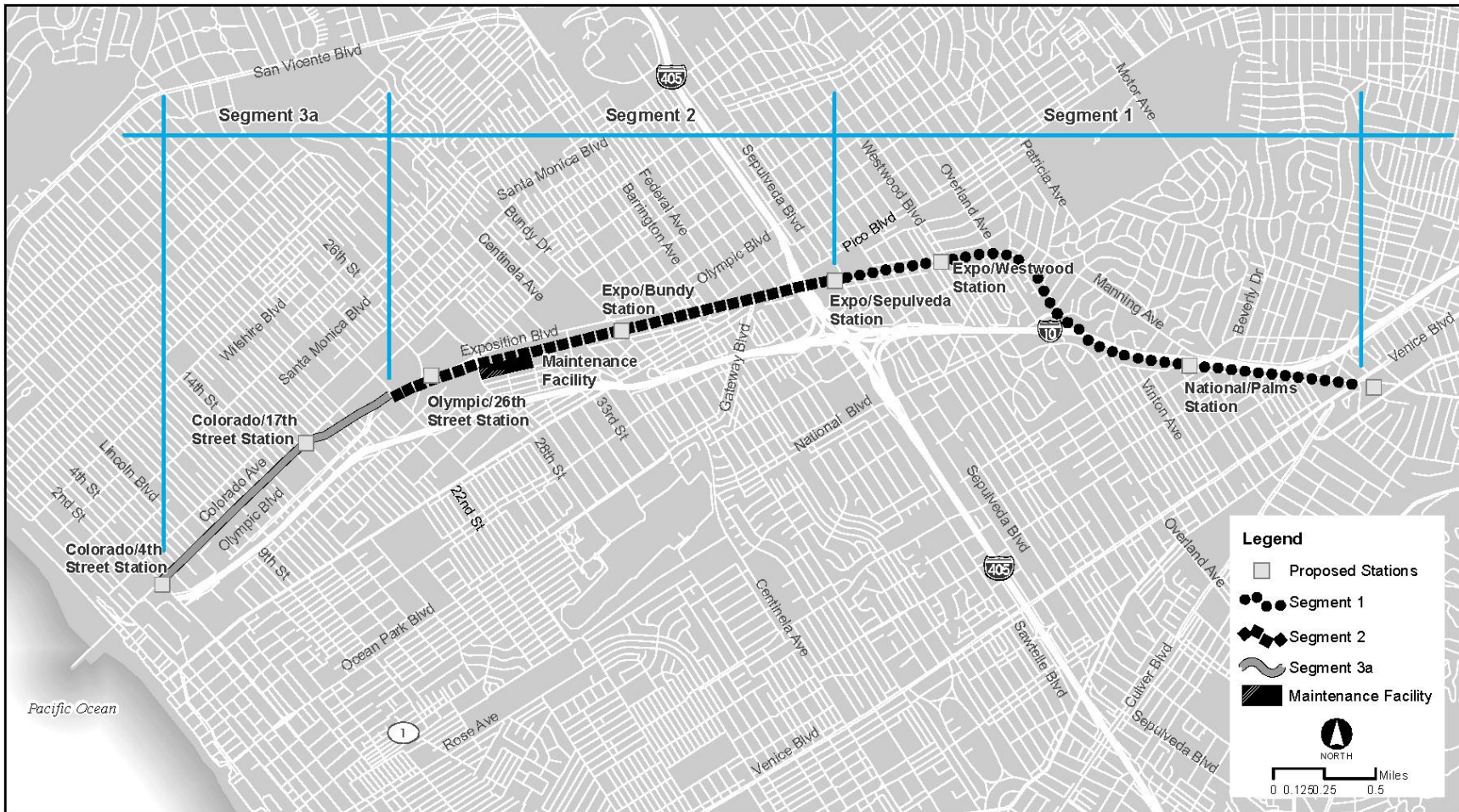
2.2 Recommended Preferred Alternative

In the Expo Phase 2 FEIR, six alternatives were evaluated in detail: the No-Build Alternative, the TSM Alternative, and four LRT Alternatives. Given the relative impacts associated with the various alternatives, and the goals of the proposed project, as well as cost effectiveness and efficiency of each alternative, LRT Alternative 2 (Expo ROW-Colorado) was identified as the best performing alternative, and is the Recommended Preferred Alternative (RPA) and the project alternative adopted by the Authority with the modifications described in the resolution approving the Project.

The RPA for Expo Phase 2 is an approximate 6.6-mile LRT extension of the Expo Phase 1 project, as delineated in Figure 1-1 [Recommended Preferred Alternative, LRT Alternative 2: Expo ROW—Colorado]). The alignment of the RPA is described in the FEIR.

In the FEIR, the RPA (LRT Alternative 2) is described and analyzed in the following segments:

- Segment 1 (Expo ROW)—Follows the Exposition ROW from the Expo Phase 1 terminus station in Culver City to the Exposition ROW/Sepulveda Boulevard intersection, approximately 2.8 miles in length.
- Segment 2 (Sepulveda to Cloverfield)—Follows the Exposition ROW from the Exposition ROW/Sepulveda Boulevard intersection to the Exposition ROW/Olympic Boulevard intersection, approximately 2.3 miles in length.
- Segment 3a (Colorado)—Follows the Exposition ROW from the Exposition ROW/Olympic Boulevard intersection to west of 19th Street in Santa Monica. The alignment then diverges onto Colorado Avenue east of 17th Street and continues along the center of Colorado Avenue terminating between 4th and 5th Streets, approximately 1.5 miles in length.



Source: Metro, 2008; DMJM Harris, 2008

Figure 1-1 Recommended Preferred Alternative, LRT Alternative 2: Expo ROW—Colorado

Along these three segments, the RPA would include the following seven stations:

- National/Palms—The National/Palms Station would be located within the Exposition ROW just west of the aerial structure over National Boulevard/Palms Boulevard. The station would have a center platform, at least 270-foot-long and up to 30-foot-wide depending upon the width of the adjacent pocket track. Although the platform would be located at grade, the Exposition ROW is at a higher elevation than the adjacent streets in this area. Access to the platform would be provided from street level by stairs, ramps, and/or elevator. No station parking would be provided.
- Expo/Westwood—The Expo/Westwood Station would be an at-grade side or center-platform station and would be located within the Exposition ROW on the east side of Westwood Boulevard. The platform would be at least 270 feet long and 16 feet wide. Approximately 170 surface parking spaces would be provided for the station, with approximately half of the spaces situated on both sides of the alignment between Overland Avenue and Westwood Boulevard. Vehicles utilizing the north side parking would enter from Overland Avenue southbound, while vehicles using the south side parking could enter and exit from either Overland Avenue or Westwood Boulevard.
- Expo/Sepulveda—The Expo/Sepulveda Station would be located within the Exposition ROW just west of Sepulveda Boulevard. The station would be at grade and would have two approximately 270-foot-long, 12-foot-wide side platforms. Access would be from Sepulveda and Exposition Boulevards. A three-level parking structure would be constructed on the site of the existing surface parking lot of the LADOT property to the south of the station. The ground level would continue to accommodate existing LADOT parking requirements. The structure would have two decks above the existing surface parking, with each deck containing approximately 130 spaces for station parking (260 in total). Vehicular access to this facility would be from Exposition Boulevard.
- Expo/Bundy—This station would be constructed as part of the aerial structure over Bundy Drive. The station would have an approximate 270-foot-long, 23-foot-wide center platform and would be located either immediately over the street or a short distance to either the east or the west of the street. Access to the platform would be by stairs and elevators at one or both ends of the platform. Up to 250 surface parking spaces would be built within the Exposition ROW between Barrington Avenue and Centinela Avenue. Vehicular access to these spaces would be from Exposition Boulevard.
- Olympic/26th Street—The Olympic/26th Street Station would be located east of 26th Street in Santa Monica. The at-grade station would lie partially within the Exposition ROW, which narrows to a minimum of approximately 30 feet at this location, and partially within City of Santa Monica-owned property to the south of the Exposition ROW. It would be an at-grade station and would have an approximate 270-foot-long, 16-foot-wide center platform. No station parking would be provided.
- Colorado/17th Street—The Colorado/17th Street Station would be located within the center of Colorado Avenue southwest of 17th Street. It would be an at-grade station and would have an approximate 270-foot-long, 16-foot-wide center platform. Up to 70 surface station parking spaces would be provided at the southeast corner of 17th Street and Colorado Avenue. Traffic volumes indicate the need for one through lane eastbound. In the eastbound direction, a second through lane may be desired for better bus-rail interface and a bus stop.

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- Colorado/4th Street—The Colorado/4th Street Station would be located off-street on the existing commercial block bounded by 4th Street, 5th Street, and Colorado Avenue. It would be at grade similar to the level of 4th Street and would have a two-platform/three-track or a one-platform/three-track configuration that would occupy the site in a diagonal southwest-northeast configuration. Due to the slope of the site, away from Colorado Avenue, the platforms would be on fill, above the existing ground. Each platform would be 16 feet wide and at least 270 feet long. No parking would be built at the Colorado/4th Street Station. The approximate 215 parking space demand at this station would be provided through the City of Santa Monica's Downtown Parking Program. Transit patrons would use public designated parking spaces in nearby public parking facilities in downtown Santa Monica.

Other Related Facilities

Other ancillary facilities would be needed to operate the RPA. These would include:

- Traction Power Substations—Traction Power Substation (TPSS) are electrical substations that receive high voltage AC (alternating current) power provided by the power utility companies and transform the power to 750 Volt DC (direct current) power for distribution to the LRT vehicles. Overall, approximately eight TPSS sites would be required for the RPA.
- Overhead Contact System—The LRT line would be electrically powered. The electric current would come from a copper contact wire that would be suspended above the track. A device called a pantograph on the roof of the LRT vehicle slides along the underside of the contact wire and delivers electric power to the vehicle. This contact wire and the poles and other structures that support it are collectively known as an Overhead Contact System (OCS).
- Communication and Signal—Communication and Signal (C&S) buildings house train controls and communications for LRT operations. C&S buildings are typically co-located with stations or TPSS sites or, ideally, adjacent to track interlockings (i.e., an interconnected arrangement of signals, switches, and control apparatus).
- Radio Towers—Up to two radio towers would be installed along the alignment to support communications. These could be located on the Exposition ROW to the west of the Expo/Sepulveda Station, and the Caltrans ROW outside the shoulder of the I-10 Freeway just west of Motor Avenue.
- Bicycle Facilities—Stations would include bicycle racks and lockers in accordance with *Metro Design Criteria*.
- Maintenance Facility—A Maintenance Facility is proposed to be constructed as a part of the Expo Phase 2 Project. The facility would be designed and built to meet the maintenance needs of the light-rail vehicles required to operate the Expo Phase 2 line.

Operating Plans

Initial revenue/non-revenue hours would be from approximately 4:00 a.m. to 2:00 a.m. daily. Service headways would average 5 minutes for weekday peak periods and between 10 and 20 minutes for off-peak periods. The estimated one-way travel time is 19.5 minutes, or an average operating speed of 20.3 mph for the RPA. In consultation with Metro, fleet requirements were revised to include 47 light-rail vehicles to interline (i.e., run) Metro Blue Line trains on the Expo

Line. This number of light-rail vehicles assumes 3-car trains at 6-minute headways based on operating issues associated with the Metro Blue Line.

FEIR Design Options

In response to comments received on the DEIR and after further analysis and coordination with various stakeholders, five design options were identified and assessed in the FEIR. The following design options, except for the Maintenance Facility Buffer, are not included as part of the RPA, but may be adopted by the Authority:

- Sepulveda Grade Separation—Grade separates Sepulveda Boulevard, with a bridge structure and an aerial Expo/Sepulveda Station, subject to the provision of additional funding by others. Under this grade separated design option, the LRT alignment would ascend starting west of Military Avenue to a bridge structure over Sepulveda Boulevard and an aerial station platform between Sepulveda Boulevard and the I-405 Freeway.
- Expo/Westwood Station No Parking—Eliminates the 170 surface parking spaces that were dedicated to transit patrons at the Expo/Westwood Station. Parking access from Overland Avenue and Exposition Boulevard would be eliminated. To address community concerns regarding the loss of on-street parking along Westwood Boulevard, 20 parking spaces would be dedicated to neighborhood residents east of Westwood Boulevard and north of the LRT line.
- Maintenance Facility Buffer—Provides an alternative layout for the Maintenance Facility that would occupy only a portion of the Verizon site, with an extension of the facility into the existing Santa Monica College parking lot to the west. Utilization of the adjacent parking lot on the west side of the Verizon site would create an approximate 100- to 110-foot buffer between the Maintenance Facility and the residential area on the south side of Exposition Boulevard. This design option is incorporated into the description of the Project.
- Colorado Avenue Parking Retention—Preserves on-street parking along Colorado Avenue by reducing the width of the LRT trackway and sidewalks along selected portions of Colorado Avenue. Further, the OCS poles would be located within the sidewalks on either side of the street (versus in the center of the tracks), requiring the contact wires to span the entire street overhead. California Public Utilities Commission (CPUC) approval would be required for the reduction in track spacing.
- Colorado/4th Parallel Platform and South Side Parking—Places Colorado/4th Street Station parallel to 4th Street and modifies the track geometry leading to the station between the terminus and approximately 11th Street. With this track reconfiguration, the on-street parking would be retained on the south side of Colorado Avenue rather than the north side, between 5th Street and Lincoln Boulevard.

2.3 Project Goals and Objectives

The goals and objectives of the Expo Phase 2 Project are described in the FEIR. The goals and objectives were developed by the Authority from the extensive corridor and systems planning studies carried out since 1999, through the public scoping and outreach process and in accordance with regionally adopted plans and policies (e.g., Metro Long Range Transportation Plan, SCAG RTP). Additionally, established transportation and land use goals and objectives of the major government jurisdictions within the study area, including the cities of Los Angeles,

Culver City, and Santa Monica were used as the foundation of these goals and objectives. Based on these planning and community involvement activities, the following four main goals and associated objectives have been established for the Expo Phase 2 project and were utilized in the development and evaluation of alternatives considered in the FEIR:

- Goal 1: Improve mobility and regional connectivity
 - Provide transit service on the Westside that can readily be integrated into the existing regional transit network
 - Provide a safe means of transportation between the Westside and downtown
 - Connect to downtown Los Angeles, the Westside and Santa Monica
 - Provide seamless access to the existing regional transit system
 - Support east/west travel patterns
 - Offer alternatives to highly congested roadways
 - Expand transportation system capacity
 - Decrease travel times
- Goal 2: Protect and enhance the human and natural environment
 - Support regional air quality plans
 - Conserve energy
 - Minimize negative impacts to neighborhoods
 - Avoid impacts to historic, archaeological and cultural resources
 - Protect natural resources
 - Minimize noise and vibration impacts
 - Minimize construction impacts
 - Minimize safety impacts
- Goal 3: Promote transit-supportive land use and economic development
 - Accommodate existing and future population and job growth on the Westside by providing a high-capacity transit service as an alternative to the congested I-10 freeway and adjacent east/west streets
 - Provide transit service to existing major trip attractors and generators in the corridor
 - Enhance opportunities for transit-oriented development in the corridor through the provision of an efficient, high-capacity transit alternative
 - Link the urban centers of Los Angeles, Culver City, and Santa Monica as regional employment and commercial centers
 - Improve access to jobs and major activity centers
 - Encourage development in planned activity centers
 - Generate investment in neighborhoods and commercial areas

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- Promote transit-supportive land use development policies
 - Create jobs
 - Goal 4: Develop an affordable and cost-effective system
 - Provide a cost-effective, high-capacity transit system

3. NO ENVIRONMENTAL EFFECTS; LESS-THAN-SIGNIFICANT EFFECTS WITHOUT MITIGATION MEASURES

The Authority finds that, based upon substantial evidence in the record, as discussed below, the following impacts associated with the RPA have either no effect or the design and other features incorporated into the RPA have reduced any environmental effects to less than significant. As a result, no additional mitigation is required to reduce effects to less than significant. Explanations below apply to the RPA and consider all design options.

3.1 Transportation/Traffic

3.1.1 Vehicle Miles Traveled and Vehicle Hours Traveled

The RPA would result in a beneficial impact on vehicle miles traveled (VMT) and vehicle hours traveled (VHT) relative to the No-Build Alternative in the year 2030. In Los Angeles County, VMT and VHT would decrease by 0.02 and 0.10 percent, respectively. The study area would also experience a reduction of 0.38 percent in VMT and 1.22 percent in VHT. No mitigation is required.

3.1.2 Transit

Implementation of the RPA would have a beneficial impact on transit trips and transit mode share in comparison to the No-Build Alternative in the year 2030. The RPA would result in an increase of 0.94 percent in daily transit trips for the entire county and 0.94 percent in transit mode share, which represents the percent of transit trips compared to total trips. No mitigation is required.

3.1.3 Traffic Operations

The RPA would result in changes to local circulation, station access traffic, and grade crossings delays, all of which would affect local traffic operations. However, the project also includes a large number of roadway improvements at the grade crossings and other locations and in the vicinity of stations. As a result, there would be less-than-significant impacts at the at-grade crossings and nearby intersections, and the RPA would not substantially disrupt traffic operations or affect emergency vehicle response. No mitigation is required.

3.1.4 Traffic Circulation

The operation of the RPA would not cause substantial redistribution of traffic into adjacent neighborhoods or onto nearby parallel streets or arterials, and impacts would be less than significant. No mitigation is required.

3.1.5 Level of Service

Implementation of the RPA would not degrade study area intersections projected to operate above level of service (LOS) E, or further degrade the study area intersections that are already projected to operate at LOS E or F under year 2030 No-Build conditions. As such, the RPA would not result in significant delay impacts to any of the study intersections relative to the No-Build Alternative, resulting in less-than-significant impacts. In addition, no Congestion Management Plan (CMP) intersections are located within the RPA alignment so LOS standards established by the CMP would not be exceeded. No mitigation is required.

3.1.6 Off-Street Parking

There would be no off-street parking impacts associated with the RPA. Any changes in off-street parking requiring property acquisition would be addressed by the *Uniform Relocation Assistance and Real Property Acquisition Policies Act* and the *California Relocation Assistance Act*; hence no impact would occur, and no mitigation is required.

3.1.7 Pedestrian and Bicycle Routes or Facilities

Development of the RPA would not result in significant impacts on the pedestrian safe routes to school, nor would it eliminate existing or planned pedestrian/bicycle facilities. Moreover, bicycle and pedestrian facilities would be provided as part of station access area near the proposed stations. Since the existing bicycle/pedestrian facilities would be maintained and additional facilities would be added, there would be no change in current safety conditions. Additionally, Metro's Rail Safety Education Program and Rail Safety Orientation Program would help to ensure pedestrian/bicycle safety at the RPA at-grade crossings near pedestrian safe routes to schools. As such, implementation of the RPA would not result in unsafe conditions for pedestrians and bicyclists. No mitigation is required.

3.1.8 Findings

The Authority finds that the implementation of the RPA would result in less-than-significant, beneficial or no impacts related to traffic-related issue areas disclosed above. This includes impacts to transit, traffic operations, traffic circulation, level of service, off-street parking, and pedestrian and bicycle routes or facilities.

Facts in Support of Findings

The facts in support of this finding are described in FEIR Section 3.2 (Transportation/Traffic) regarding traffic-related issues found to be less than significant.

3.1.9 FEIR Design Options

No impact beyond that discussed above for the LRT Alternatives would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options.

Findings

The Authority finds that the implementation of any of the identified design options would result in less-than-significant, beneficial or no impacts related to traffic-related issue areas disclosed above. This includes impacts to transit, traffic operations, traffic circulation, level of service, off-street parking, and pedestrian and bicycle routes or facilities.

Facts in Support of Findings

The facts in support of this finding are described in FEIR Section 3.2 (Transportation/Traffic) regarding traffic-related issues found to be less than significant.

3.2 Aesthetics

3.2.1 Scenic Vistas

No scenic vistas, as defined by the cities of Los Angeles, Culver City, or Santa Monica, have been identified for Segment 1 (Expo ROW) or Segment 2 (Sepulveda to Cloverfield). As a result, development of the RPA within these segments would have no impact on a scenic vista or an identified aesthetic feature in the study area.

The scenic vistas identified for Segment 3a (Colorado) consist of a direct view of the Santa Monica Pier heading west on Colorado, and a direct view of the Main Street Bridge from the proposed Colorado/4th Street Station. The LRT system (e.g., OCS, trackwork, etc.) would extend down the center of Colorado Avenue and would diminish views of the Pier sign from within the roadway when Light Rail Vehicles (LRVs) are present; however, views from the pedestrian sidewalks on either side of the street would remain unobstructed. Views of the Main Street Bridge from the proposed Colorado/4th Street Station would not be considered sensitive, since existing views are limited to the top side of the bridge including surface paving, vintage streetlights, and approach fences. As previously stated, these views are not considered sensitive and a less-than-significant impact would occur. As a result, development of the RPA within Segment 3a (Colorado) would have a less-than-significant impact on a scenic vista or an identified aesthetic feature in the study area. No mitigation is required.

3.2.2 State-Designated Scenic Highways

Segment 1 (Expo ROW) would intersect with, and offer views of, Venice Boulevard, which is designated as a scenic highway by the City of Los Angeles but is not eligible or designated as a state scenic highway. There are no designated state scenic highways within Segment 2 (Sepulveda to Cloverfield) or Segment 3a (Colorado). Therefore, the RPA would have no impact on any scenic resources within a state scenic highway. No mitigation is required.

3.2.3 Light or Glare

The LRVs could create a source of daytime glare where the Exposition ROW is adjacent to residential or other glare-sensitive uses. Neither the LRT tracks nor the OCS would be made of reflective materials and would require minimal surface area so that these elements of the RPA would not result in glare impacts. The lighting requirements of the LRVs are set forth by the CPUC. The lighting requirements put forth by the CPUC are designed to maximize LRT safety.

Adherence to the requirements of CPUC and Section 2.7.3 (Light and Glare) of the *Metro Design Criteria* would reduce potential impacts resulting from new sources of light and glare such that a less-than-significant impact would occur with implementation of the RPA. No mitigation is required.

3.2.4 Findings

The Authority finds that the implementation of the RPA would result in no or less-than-significant impacts with regard to aesthetic issue areas disclosed above. This includes scenic vistas, state-designated scenic highways, and light or glare.

Facts in Support of Findings

The facts in support of this finding are described above, in FEIR Section 3.3 (Aesthetics) and in FEIR Volume II (Comments and Responses).

3.2.5 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options.

Findings

The Authority finds that the implementation of any of the identified design options would result in no or less-than-significant impacts with regard to aesthetic issue areas disclosed above. This includes scenic vistas, state-designated scenic highways, and light or glare.

Facts in Support of Findings

The facts in support of this finding are described above, in FEIR Section 3.3 (Aesthetics) and in FEIR Volume II (Comments and Responses).

3.3 Air Quality

3.3.1 Air Quality Management Plan

The Expo Phase 2 Project is included in regional transportation plans, which are required to be consistent with the regional Air Quality Management Plan (AQMP) by the federal *Clean Air Act*. SCAG's RTP, which was updated in 2008, meets the long-term transportation planning requirements specified in the *Clean Air Act* for reduction of on-road mobile source emissions. SCAG's biennial Regional Transportation Improvement Program (RTIP) meets the short-term implementation requirements through prioritization and implementation of a special category of transportation projects called Transportation Control Measures (TCMs).⁴ The Expo Phase 2

⁴ The region is required to identify TCMs, as specified in the *Clean Air Act* (Section 108 (f)(1)(A)), and also by U.S. EPA's Transportation Conformity Rule (40 CFR Part 93). In general, TCMs are those projects that provide emission reductions from on-road mobile sources, based on changes in the patterns and modes by which the regional transportation system is used. The various strategies considered as

Project is included in SCAG's 2008 RTP and the 2008 RTIP, and as such, would be consistent with and would not conflict or obstruct with implementation of the 2007 AQMP. Therefore, Implementation of the RPA would offer a beneficial air quality effect since it would support implementation of the 2007 AQMP. No mitigation would be required.

3.3.2 Air Quality Standards and Operational Emissions

Implementation and operation of the RPA would have a beneficial effect on regional air emissions. In comparison to the No-Build Alternative, the RPA would result in lower regional VMT and a corresponding reduction in regional emission levels. Furthermore, operation of the RPA would not contribute to air emissions, because electrically operated light-rail trains do not produce carbon monoxide (CO), volatile organic compounds (VOCs), nitrogen oxides (NO_x), sulfur oxides, fine suspended particulate matter (PM₁₀ and PM_{2.5}) emissions. Therefore, implementation of the RPA would result in a beneficial effect with regards to attaining air quality standards and daily emissions thresholds.

Operation of the RPA, including the station parking areas and the Maintenance Facility, would not result in pollution concentrations that exceed the South Coast Air Quality Management District (SCAQMD) thresholds for sensitive receptors, including CO concentrations at study intersections. The FEIR reports CO concentrations at nearby study intersections would be much lower than either federal or state ambient air quality standards, and CO concentrations at parking structures and lots would be below the SCAQMD's thresholds of significance. As such, CO hotspots would not occur within the study area, and the impact of localized CO concentrations would be less than significant. No mitigation is required.

3.3.3 Findings

The Authority finds that implementation of the RPA would result in less-than-significant or beneficial impacts related to air quality standards and operational emissions.

Facts in Support of Findings

The facts in support of this finding are described above, in FEIR Section 3.4 (Air Quality) and in FEIR Volume II (Comments and Responses).

3.3.4 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less-than-significant or beneficial levels with implementation of any of the design options.

Findings

The Authority finds that the implementation of any of the identified design options would result in less-than-significant or beneficial impacts related to air quality standards and operational emissions.

part of the 2008 RTP and 2008 RTIP are defined, collectively, as a single TCM, with specific strategies for various methods to reduce transportation-related emissions. If the Basin were to fall into a state of nonattainment for a criteria pollutant, only those projects identified as TCMs would be allowed advance.

Facts in Support of Findings

The facts in support of this finding are described above, in FEIR Section 3.4 (Air Quality) and in FEIR Volume II (Comments and Responses).

3.4 Global Climate Change

3.4.1 Greenhouse Gas Emissions

Implementation of the RPA would result in increased transit ridership in Los Angeles County because of new connectivity between downtown Los Angeles and the Westside, and thus, reduce annual VMT associated with single-occupancy automotive traffic compared to the No-Build Alternative. The RPA would result in an increase of 7,300 metric tons per year of CO₂e (MTCO₂e) over the No-Build and TSM Alternatives; however, based on the significance thresholds recommended by the California Air Pollution Control Officers Association (CAPCOA) and others, a project is considered less than significant if greenhouse gas emissions, including construction impacts amortized over 30 years, show an incremental increase below 10,000 MTCO₂e/year. As such, the RPA would have a less-than-significant effect on greenhouse gas emissions, and no mitigation is required.

3.4.2 Plans, Policies and Regulations

Implementation of *Metro's Sustainability Implementation Plan* adopted in 2008 would ensure that greenhouse gas emissions from electricity use would decrease as the plan's initiatives and programs are implemented. Additionally, the RPA would result in a reduction of VMT and therefore, is itself a form of mitigation according to the CAPCOA California Climate Action Team (CAT), United States Environmental Protection Agency (U.S. EPA), and other climate change policymakers.

3.4.3 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to greenhouse gas emissions.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.5 (Global Climate Change) and in FEIR Volume II (Comments and Responses).

3.4.4 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Implementation of the design options would involve minor redesign of certain elements of the proposed alignment. However, the proposed design options would not be anticipated to affect the daily operations of the RPA, nor increase/decrease traffic volumes. Thus, no change in the level of operational greenhouse gas emissions discussed above for the RPA is anticipated. Impacts on greenhouse gas emissions would remain less than significant.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to greenhouse gas emissions.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.4 (Air Quality) and in FEIR Volume II (Comments and Responses).

3.5 Biological Resources

3.5.1 Sensitive Species and Other Wildlife Species

Sensitive species observed in the study area include nesting migratory birds and monarch butterflies that could utilize eucalyptus trees within Segment 1 (Expo ROW) for winter roosting. The project could impact nesting migratory birds if there was an increase in noise that resulted in an abandonment of nests. However, in noisy urban environments, birds tend to either adapt by changing their song frequencies, or they depart from those habitats prior to nesting. As a result, a less-than-significant impact to nesting migratory birds would occur as a result of operational activities. Construction and operational activities would not result in the disturbance of eucalyptus trees since they are located outside the construction areas, and no impact would occur.

With regard to the movement of native or migratory fish or wildlife species, the study area does not provide a major or local wildlife corridor or travel route because it does not connect two significant habitats for either fish or wildlife species. Therefore, development of the RPA would not disrupt the movement of any native or migratory fish or wildlife species, and no impact would occur.

3.5.2 Riparian Habitat or Other Sensitive Natural Communities

Neither riparian habitat, nor sensitive natural communities, nor federally regulated wetland occur within the RPA study area. Instead, the study area is highly urbanized and consists of urban landscape and ruderal vegetation communities, neither of which is considered a sensitive biological resource. These two vegetation community types do not support high species diversity or high productivity and are not limited in distribution or coverage. Therefore, the RPA would not directly or indirectly affect a riparian habitat, other sensitive natural community, or wetland. No impact would occur to a biologically sensitive habitat.

3.5.3 Biological Resource-Related Plans or Policies

The study area contains oak trees, protected trees, and street trees. If the RPA should remove these trees, permits would be required prior to the removal or trimming of oak trees (pursuant to the County of Los Angeles regulations), protected trees (pursuant to the City of Los Angeles regulations), and/or street trees (pursuant to the Cities of Santa Monica and Culver City regulations). In the event that trees are removed, the removed trees would be replaced in accordance with the *Metro Design Criteria* which call for a one-for-one replacement, subject to

local jurisdictional requirements for minimum size, species, and setback requirements. The Authority would voluntarily request necessary permits.

No conservation plans have been adopted for any portion of the study area. Therefore, development of the RPA would not conflict with an adopted Habitat Conservation Plan, and no impact would occur.

3.5.4 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to biological resources.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.6 (Biological Resources) and in FEIR Volume II (Comments and Responses).

3.5.5 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options.

Findings

The Authority finds that implementation of any of the design options would result in less-than-significant impacts related to biological resources.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.6 (Biological Resources) and in FEIR Volume II (Comments and Responses).

3.6 Cultural Resources

3.6.1 Historic Architectural Resources

The RPA would not result in the demolition or modifications to the setting or character of any identified eligible, or potentially eligible historic resources (e.g., buildings, sites, structures, objects, and historic districts) listed in the California Register and the National Register.

3.6.2 Findings

The Authority finds that implementation of the RPA would result in no impact to historic architectural resources.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.7 (Cultural Resources) and in FEIR Volume II (Comments and Responses).

3.6.3 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, no impact would occur to historic architectural resources with implementation of any of the design options.

Findings

The Authority finds that implementation of the RPA would result in no impact to historic architectural resources.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.7 (Cultural Resources) and in Volume II (Comments and Responses).

3.7 Geology, Soils and Seismicity

3.7.1 Faults

The RPA is not in a State of California Earthquake Fault Zone. The active Newport-Inglewood Fault Zone is approximately $\frac{3}{4}$ -mile southwest of the study area. Potential impacts related to groundshaking would occur if the guideway system (including but not limited to tracks, aerial structures, and OCS) were affected by ground deformation and/or liquefaction. Since the RPA would adhere to design standards that have been specifically developed to address seismic conditions, implementation of the RPA would result in a less-than-significant impact from seismic activity in the region.

3.7.2 Soils

Construction of the RPA would involve ground-disrupting activities, such as excavation and trenching for foundations and utilities (associated with the transit stations, aerial structures, and maintenance facility) and soil compaction and site grading associated with implementation of a new track system. The State Water Resources Control Board (SWRCB)—through its National Pollutant Discharge Elimination System (NPDES) Program—requires erosion and sediment controls for projects with more than 1 acre of land disturbance. Requirements associated with the NPDES Program include preparation and implementation of a Stormwater Pollution Prevention Plan and a Water Quality Management Plan; and preparation and implementation of an erosion and sediment control plan. The Project would be required to comply with these existing regulations. Adherence to these requirements would prevent substantial on-site erosion and would ensure that the RPA would not result in substantial soil erosion or the loss of topsoil; therefore, the proposed project would create a less-than-significant impact.

Liquefiable alluvial soils have been identified between approximately the Exposition ROW east of Stewart Street and the Exposition ROW at Pico Boulevard. However, since the proposed project would be constructed in compliance with the California Building Code (CBC) and *Metro Design Criteria*, it would not be adversely affected by liquefiable soils. Compliance with the CBC and the *Metro Design Criteria* would also ensure that implementation of the RPA would not be adversely affected by expansive soils, on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.

3.7.3 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to geology, soils and seismicity.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.8 (Geology, Soils, and Seismicity) and in FEIR Volume II (Comments and Responses).

3.7.4 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to geology, soils, and seismicity.

Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to geology, soils and seismicity.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.8 (Geology, Soils, and Seismicity) and in FEIR Volume II (Comments and Responses).

3.8 Hazards and Hazardous Materials

3.8.1 Electromagnetic Fields

Operation of light-rail transit would introduce new electromagnetic field (EMF) sources associated with the electrical power system used to propel the vehicles, including the OCS, TPSS, and the radio towers. Based on the strength of EMFs on light-rail lines similar to the ones that would be developed as part of the RPA, light-rail generated EMFs would be too low to adversely affect riders or nearby sensitive receptors. Since EMFs produced by LRT systems are relatively weak and TPSS are self-contained, the proposed project would result in a less-than-significant impact with respect to increased risk to human health associated with EMFs.

3.8.2 Hazardous Materials

No hazardous materials would be intentionally transported during the operation of the RPA. Typical commercial cleaning products, as well as maintenance products, would be used to clean the stations and the interior of the LRVs. Grounds and landscape maintenance within the corridor, at each station, and at the maintenance facility could involve a wide variety of commercial products including cleaners and degreasers, water based solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides. Operation of the maintenance facility would be subject to federal and state agencies, such as the California Occupational Safety and Health Administration (Cal-OSHA) and California Environmental Protection Agency (Cal EPA), which regulate safety practices and the use and disposal of hazardous materials. Federal, state, and local regulations govern the use, transportation, and storage of hazardous wastes. Compliance with applicable federal and state laws related to the handling of hazardous materials would be implemented to maximize containment (through safe handling and storage practices) and to provide for prompt and effective cleanup if an accidental release occurs. Therefore, the RPA would pose a less-than-significant impact to the public and the environment from routine and accidental exposure to hazardous materials and wastes handling.

The maintenance facility would have no diesel operated equipment onsite except for a back-up generator, which would be operated for an average of a half an hour a week for upkeep purposes only. All solvents used in association with the maintenance activities would be water based. The *Metro Fire/Life Safety Design Criteria* would require that the drainage system for the maintenance facility include oil separators and grease and sand traps on all floor drainage systems that service maintenance and vehicle storage areas to provide for the extraction of oil, grease, sand and other substances that are harmful or hazardous to the structure or public drainage systems. Periodic maintenance checks and flushing shall be conducted on all drains, oil separators and grease traps to assure that they are clear of obstructions and perform their designed function. Any flammable liquids and greases shall be removed to an area approved for disposal, thereby reducing this impact. Additionally, the *Metro Design Criteria* would require that the wash facility be equipped with a required wastewater treatment facility.

Federal, state, and local regulations govern the use, transportation, and storage of wastes identified as hazardous. Metro, as the agency that would operate the project, will comply with all of these regulations. Therefore, impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials during operation of the RPA that would create a significant hazard to the public or the environment would be less than significant.

There are several schools located along, and within 0.25 mile of, the RPA alignment. With regard to operational activities, no new stationary sources of hazardous materials would be proposed for the RPA, except the maintenance facility. New Roads High School is located within 0.25 mile of the maintenance facility. As previously stated, the maintenance facility would have no diesel operated equipment onsite except for a back-up generator, which would be operated for an average of a half an hour a week for upkeep purposes only. All solvents used in association with the maintenance activities would be water based. Compliance with federal, state, and local laws and regulations minimize the risk associated with the exposure of schools to hazardous or potentially hazardous materials. Therefore, the RPA would result in a less-than-significant impact related to the handling or emission of hazardous materials.

The RPA alignment could be located on, or across from, hazardous materials sites identified within federal, state, and/or county hazardous waste lists and databases pursuant to

Government Code Section 65962.5.⁵ However, numerous regulations that ensure safety at at-grade rail crossings will be required. From an operational perspective, the potential for accident conditions that could involve the release of hazardous materials is less than significant.

3.8.3 Safety Hazards

The nearest airport to the study area is the Santa Monica Municipal Airport, which is approximately 1.2 miles from Segment 2 (Sepulveda to Cloverfield), between Bundy Drive and Walgreen Avenue. According to the Santa Monica Municipal Airport Influence Area Map, the RPA would not occur within the Airport Influence Area for the Santa Monica Airport; therefore, development of the RPA would result in no impact related to safety hazards associated with the ongoing operation of a public airport.

Emergency response and emergency evacuation plans can be affected by temporary or permanent circulation changes, including road closures, lane reconfigurations, and other access changes associated with construction activities or a change in circulation patterns if the LRT Alternatives were implemented. None of Metro's operations would interfere with the ability of federal, state, or local jurisdictions to respond to emergency conditions or prevent them from implementing their public safety element and municipal code provisions that address emergency response and emergency evacuation procedures. The proposed project would comply with all applicable local, state, and federal laws and regulations governing emergency access and evacuation. Therefore, the RPA would have a less-than-significant impact associated with emergency response and evacuation.

The study area is fully developed (e.g., urban) and does not contain wildlands designated by the California Department of Forestry and Fire Protection as a Substantial Wildfire Hazard Area or a Very High Fire Hazard Severity Zone, nor does the study area contain wildfire hazard areas designated by the relevant General Plans. Therefore, the RPA would result in no impacts related to wildland fires.

3.8.4 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to hazards and hazardous materials.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.9 (Hazards and Hazardous Materials) and in FEIR Volume II (Comments and Responses).

3.8.5 FEIR Design Options

No impact beyond that discussed above for the identified design options would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to hazards and hazardous materials.

⁵ Government Code Section 65962 requires that the DTSC annually update the *Hazardous Waste and Substances Sites List* (also known as the Cortese List).

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to hazards and hazardous materials.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.9 (Hazards and Hazardous Materials) and in FEIR Volume II (Comments and Responses).

3.9 Hydrology and Water Quality

3.9.1 Water Quality and Waste Discharge

Segment 1 (Expo ROW) could result in a small amount of additional impervious (approximately 1.1 acres) associated with stations, station parking facilities, and the guideway, while Segment 2 (Sepulveda to Cloverfield) and Segment 3a (Colorado) would not result in additional impervious surface area, as these segments are almost entirely developed. The Maintenance Facility, however, would replace existing impervious surface with pervious surface cover. Therefore, facilities associated with the RPA would not contribute to a substantial increase in stormwater runoff, as result of increased impervious surfaces. Moreover, all runoff leaving the alignment would be routed to existing underground storm drain systems and/or lined channels. Therefore, potential increases in stormwater runoff would not cause or contribute to off-site erosion water quality or habitat degradation. Since the LRVs would be powered by overhead electrical lines and would generate only a small increase in oil, grease, and metals, operation of the RPA would not be expected to cause or contribute to substantial additional pollutant loads that would have a significant effect on water quality.

Adherence to the *Metro Fire/Life Safety Design Criteria*, *Metro Design Criteria*, Best Management Practices (BMPs), waste discharge requirements, Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, Municipal Codes, and Municipal NPDES Permits would ensure that the RPA prevents pollutants from being flushed into the existing storm drain systems and avoids violations of waste discharge requirements. Therefore, operation of the RPA would not violate water quality standards or waste discharge requirements, and the project would have a less-than-significant impact on water quality.

3.9.2 Groundwater

Generally, the alignment is underlain by contaminate-affected groundwater, and as a result, groundwater wells serving the cities of Santa Monica, Culver City and Los Angeles ceased pumping and production in 1996. No new wells would be developed as part of the RPA. However, an environmental site assessment was conducted after the preliminary selection of the RPA in the fall 2009, which identified that groundwater monitoring wells are located within the Expo ROW. Therefore, the Authority would be required to remove any existing groundwater monitoring wells located within the ROW, as required by state law, and in coordination with the Regional Water Quality Control Board (RWQCB). There would be no direct effect on groundwater levels.

Potential groundwater recharge within the Santa Monica Basin is primarily from upland runoff through streams and over land surfaces. Direct precipitation on the basin within the proposed project study area is not a major source of groundwater recharge. However, groundwater recharge could be impeded if a substantial amount of pervious (i.e., unpaved) area was converted to impervious (i.e., paved) surfaces. Pervious portions of the alignment would remain essentially pervious (ballast or crushed rock guideway) except for the Expo/Westwood Station parking facility area between Overland Avenue and Westwood Boulevard in Segment 1 (Expo ROW), which would be paved. The development of the remainder of Segment 2 (Sepulveda to Cloverfield) and Segment 3a (Colorado) would not increase pervious area as the majority of these segments are paved currently. Further, portions of the currently paved Verizon site would be converted to pervious surface with development of the Maintenance Facility at that site. Therefore, construction of the RPA would result in additional impervious areas within the study area. However, because rainfall is not a major source of groundwater recharge in the study area, the increase in impervious surface created by the project would not substantially affect groundwater recharge.

Although the alignment is underlain by contaminated groundwater, based on the conceptual engineering design and proposed construction and operation BMPs, the project would not contribute to or be affected by this existing condition, and the effect to the project is considered low. Implementation of the RPA would result in a less-than-significant impact.

3.9.3 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to water quality and groundwater.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.10 (Hydrology and Water Quality) and in FEIR Volume II (Comments and Responses).

3.9.4 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to water quality and groundwater.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to water quality and groundwater.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.10 (Hydrology and Water Quality) and in Volume II (Comments and Responses).

3.10 Land Use/Planning

3.10.1 Physical Division

The RPA would require access restrictions and modifications to the Exposition ROW at Overland Avenue and at Westwood Boulevard, but would not require full road closures or restrict access to an established residential community. Pedestrian crossings where the Expo ROW intersects streets, or along Colorado Avenue would be restricted to signalized intersections, similar to existing conditions. Access restrictions along Colorado Avenue at selected intersections would occur, which would permanently prohibit movement across the street. In addition, vehicle traffic would be reduced to one lane in each direction on Colorado Avenue. While access to and from Colorado Avenue would be changed, the majority of north/south movements across Colorado Avenue would be maintained. Access alterations would require travelers to use either Broadway or Olympic Boulevard in order to avoid the proposed access restrictions. East/west traffic would be reduced and moved from this roadway to parallel roadways to the north and south. While access would be changed, there would still be alternative routes to and from the established communities along the Exposition ROW. As a result, a less-than-significant impact from access restrictions to established commercial and residential communities would occur from implementation of the RPA.

The RPA would require property acquisitions in Segment 1 (Expo ROW) and Segment 2 (Sepulveda to Cloverfield), but no change to an established residential community would occur. Property acquisitions in Segment 3a (Colorado) would be required for the LRT guideway, replacement parking, and street and lane widening to accommodate the LRT system on Colorado Avenue. The land use along Colorado Avenue between 17th and 4th Streets is specifically zoned for the retention of light-industrial uses. The full acquisitions would result in the loss of industrial uses within the City of Santa Monica; however, the commercial and industrial uses along Colorado Avenue would remain for all other properties with implementation of the RPA along Segment 3a (Colorado). Additionally, zoning and land use designations along Colorado Avenue would not be altered allowing for existing land uses to remain, and the cohesion and connectivity of the community would not be impaired. Implementation of the RPA would result in a less-than-significant impact.

The RPA would create physical barriers in Segment 1 (Expo ROW), Segment 2 (Sepulveda to Cloverfield) and Segment 3a (Colorado), but no change to an established community would occur. Aerial structures proposed, including the Bundy Drive and the Centinela Avenue grade separations within Segment 2 (Sepulveda to Cloverfield) would be within the existing Expo ROW, to which access is already restricted and trespassing is prohibited. These aerial structures would introduce new visual features to the area; however, the aerial structures would be similar in mass and material type to the surrounding urban environment, including existing large-scale development and freeway infrastructure. Within Segment 3a (Colorado), one grade separation would be required along a portion of at Cloverfield Boulevard and one noise mitigation feature is proposed along the north side from 22nd Street to 20th Street. The proposed aerial structure which would include the noise mitigation feature within this segment would not represent a physical or visual division of an established community. The proposed aerial structure would be located between existing buildings several stories high, and would not be a predominant feature as it traverses Cloverfield Boulevard and Olympic Boulevard.

Additionally, the RPA would require that curbs, fencing or other suitable barriers be provided to prevent the public from gaining access to the street-running LRT guideway, in accordance with the CPUC regulations. The security barriers would not create new divisions, since the proposed new barriers would replace similar barriers (i.e., median). As such, implementation of the RPA would result in a less-than-significant impact with regard to physical barriers.

3.10.2 Land Use Plans

Segment 1 (Expo ROW) and Segment 2 (Sepulveda to Cloverfield) are consistent with the *Los Angeles General Plan* policies, as articulated in the *West Los Angeles Community Plan*, *Palms-Mar Vista-Del Ray Community Plan*, and would further the goals and policies of Chapter 6 of the Los Angeles General Plan Housing Element. The RPA would therefore have a beneficial effect on long-range planning within the City of Los Angeles.

Segment 2 (Sepulveda to Cloverfield) and Segment 3a (Colorado) are consistent with the *City of Santa Monica General Plan Land Use and Circulation Element (LUCE)* policies and applicable Conservation Element policies, and would help to achieve the goals and policies of the LUCE, which would be considered a beneficial impact of the proposed project.

3.10.3 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to the physical division of an established community or conflict with applicable land use plans.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.11 (Land Use/Planning) and in FEIR Volume II (Comments and Responses).

3.10.4 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to physical division of an established community or conflict with applicable land use plans.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to physical division of an established community or conflict with applicable land use plans.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.11 (Land Use/Planning) and in FEIR Volume II (Comments and Responses).

3.11 Noise and Vibration

3.11.1 Airport or Private Airstrip

Much of the RPA is within 2 miles of Santa Monica Municipal Airport. However, the RPA would not involve the construction of residential or other habitable uses within the bounds of the applicable airport land use plan for Los Angeles County and the Santa Monica Municipal Airport. As such, the RPA would not expose residents to excessive noise levels from a public airport and employees hired for the RPA would not be exposed to substantial airport noise because they would generally be indoors (within the cabin of LRVs) or would be exposed to airport noise for only short, temporary periods. Therefore, noise exposure would not be excessive, and no impact would occur.

The RPA is not within the vicinity of a private airstrip. Therefore, the proposed project would not expose people to excessive noise levels associated with a private airstrip.

3.11.2 Findings

The Authority finds that implementation of the RPA would result in no impacts related to excessive noise levels related to nearby airports or private airstrips.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.12 (Noise and Vibration) and in FEIR Volume II (Comments and Responses).

3.11.3 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to excessive noise levels related to nearby airports or private airstrips.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to excessive noise levels related to nearby airports or private airstrips.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.12 (Noise and Vibration) and in FEIR Volume II (Comments and Responses).

3.12 Parks and Community Facilities

No community facilities would be acquired or displaced as the result of the RPA. As such, no impact would occur.

No expanded or new park facilities would be expected in Segment 1 (Expo ROW) as a result of increased use from transit riders.

No region-serving parks are located within Segment 2 (Sepulveda to Cloverfield).

Within Segment 3a (Colorado), Memorial Park and Santa Monica State Beach could experience an increase in visitors as a result of the accessibility afforded by the RPA. It is not anticipated that Memorial Park would experience an increase in use such that new or expanded park facilities would be required.

With respect to Santa Monica State Beach (and the Santa Monica Pier), no additional access areas or expansion of park would be required and the increase of beach visitors would be consistent with the intended use of these resources because these resources are regional and national attractions. Therefore, the RPA would not require new or expanded beach-related resources, and a less-than-significant impact would occur.

3.12.1 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to parks and community facilities.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.14 (Parks and Community Facilities) and in FEIR Volume II (Comments and Responses).

3.12.2 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to parks and community facilities.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to parks and community facilities.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.14 (Parks and Community Facilities) and in FEIR Volume II (Comments and Responses).

3.13 Safety and Security

3.13.1 Safety Conditions

Potential safety impacts could occur at stations where there is a potential for conflicts between passengers and LRVs; along the proposed right-of-way where there is potential for passenger

vehicle and pedestrian accidents; and along the alignment where there is a potential for structural fires.

Safety measures would be implemented in accordance with National Fire Protection Association (NFPA), CPUC, California Code of Regulations, and Metro requirements, and all stations would include sufficiently bright lighting for visibility of platforms and trains in the evening. Further, access for emergency fire protection services would be maintained at all times at each LRT station.

Right-of-way accidents could include vehicle or pedestrian versus LRVs as a result of trespassing or crossing the alignment. The system would be operated in accordance with policies and procedures that have been developed to reduce the possibility of an accident.

In an emergency situation, fire department personnel from the cities of Culver City, Los Angeles, and/or Santa Monica would respond depending on the location of the emergency along the alignment. GO 143-B identifies fire-related requirements as established by the National Fire Protection Association. Metro's *Fire/Life Safety Design Criteria* outlines specific requirements for fire protection at stations, along the alignment and within LRVs, and requires that evacuation routes be provided along the entire length of the alignment to allow passengers to exit the train and safely leave the alignment at any location.

Implementation of the RPA would not result in restricted access for emergency responders to the proposed stations or LRT systems. RPA facilities would be located adjacent to publicly accessible roads that would allow emergency vehicles access into the operating ROW during an emergency event. The exception to this would be the portion of Segment 1 (Expo ROW) that would be located within the existing box structure under the I-10 Freeway and within the trench along the edge of Cheviot Hills. Access to both would be available at Overland Avenue to the west and from Motor Avenue to the east; therefore, no unique fire-related impacts would occur.

Compliance with *Metro Design Criteria*, operating safety procedures, and federal, state, and local safety regulations would reduce these impacts to less than significant for the RPA.

3.13.2 Security Conditions

The RPA service hours (which would include both revenue and non-revenue service) would be from approximately 4:00 a.m. to 2:00 a.m. seven days a week, consistent with existing hours of operation of the Metro system. Potential security events, such as crime, could occur; however, Metro has taken a number of steps to reduce security risks to passengers. Every proposed station would be appropriately lit in order to provide visibility around the entire station day and night, as specified by *Metro Design Criteria*. The stations would be equipped with a public address system, as well as CCTV systems that would be monitored by Metro personnel; emergency call boxes would also be available in all proposed stations for passenger use in case of an emergency. Since each train would have an operator, passengers within each car would be able to connect to the operator through an intercom system. In addition to Metro security personnel, the Los Angeles Sheriff Department (LASD) provides law enforcement across the entire Metro transit system. Deputies, both uniformed and undercover, are on duty 24 hours a day monitoring stations, trains, and parking facilities. In addition to the LASD deputies, police officers from Culver City, Los Angeles, and Santa Monica could be called on for support or police protection if needed.

Given the security features that would be included as part of the stations and vehicles, and the availability and proximity of security and law enforcement personnel to respond, the potential for substantial adverse security conditions would be less than significant for the RPA.

3.13.3 Pedestrian and Bicycle Safety

Implementation of the proposed project could increase pedestrian and/or bicycle safety risks due to the operation of LRV within or adjacent to existing streets. However, the LRT would comply with CPUC requirements and *Metro Design Criteria* to ensure safe pedestrian/bicyclist access to stations and controlled access across the tracks. While the risk of collisions between bicyclists, pedestrians, and LRVs cannot be eliminated, Metro has adopted rules and regulations that are intended to improve the overall safety of LRT operations.

Additional safety requirements include train speed restrictions, emergency braking requirements, and appropriate barriers/signage/gates to discourage pedestrians, bicyclists, and motorists from crossing the tracks where not allowed. The installation of warning devices and the design of the crossings along the ROW would be in accordance with the requirements of CPUC General Orders and *Metro Design Criteria*. In addition, the project-related elimination of at-grade roadway crossings would require pedestrians/bicyclists to cross elsewhere. For the RPA, pedestrian/bicyclist crossings would be restricted to street and/or signalized intersections and new pedestrian signals would be added. Given the design and operating requirements outlined above that would be included as part of implementation of the RPA, the potential for increased pedestrian/bicycle safety risks would be less than significant.

3.13.4 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to safety and security conditions.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.15 (Safety and Security) and in FEIR Volume II (Comments and Responses).

3.13.5 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to safety and security conditions.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to safety and security conditions.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.15 (Safety and Security) and in FEIR Volume II (Comments and Responses).

3.14 Socioeconomics

3.14.1 Acquisitions and Relocation

The RPA would necessitate the acquisition of 92 properties, and result in residential and business relocation. Specifically, implementation the RPA would require 16 residential acquisitions (1 full, 8 partial, and 7 partial curb cuts), 65 commercial acquisitions (7 full, 19 partial and 39 partial curb cuts), and 11 public acquisitions (5 full and 6 partial). Partial acquisitions associated with curb cuts are related to bringing the street corner radii up to current standards including the required ADA ramps when the RPA involves street improvements. Adherence to existing laws and regulations regarding relocation assistance and compensation for property acquisitions would be required and would ensure that this impact remains less than significant.

3.14.2 Displacement of Housing

Implementation of the RPA would result in the displacement of one housing unit in the City of Los Angeles. The occupants displaced as a result of the project would be given advanced written notice and would be informed of the eligibility requirements for relocation assistance and payments. Within the City of Los Angeles, there is sufficient housing stock to absorb the displaced occupant(s). For all property displacements, relocation assistance and compensation would be provided by the Authority as required by the *California Relocation Assistance Act*. Any potential displacement of existing housing units requires the Authority to abide by existing laws and regulations to ensure relocation assistance and compensation, ensuring that this impact remains less than significant.

3.14.3 Metro Leases

Two types of lease/license agreements exist along the Expo ROW: agreements originally made with the Southern Pacific Railroad prior to Metro's purchase of the Expo ROW; and lease/license agreements entered into by Metro with businesses after the acquisition of the Expo ROW. Leases/licenses entered into directly by Metro generally include the right to terminate the lease/license for any transportation project and include a relocation waiver as a condition to entering into the lease/license; or are month-to-month leases/licenses, which are temporary in nature. The termination of these leases/licenses would not constitute an impact and would not require compensation. Pre-acquisition leases/licenses have been identified along the alignment; however, no early lease/license terminations are anticipated to be required. If early lease/license terminations are subsequently determined to be required, the business owner would be compensated pursuant to *California Relocation Assistance Act* requirements. Adherence to these existing laws and regulations regarding relocation assistance and compensation for property acquisitions would ensure that this impact remains less than significant.

3.14.4 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to property acquisition, displacement of housing, and termination of leases.

Facts in Support of Findings

The facts in the support of the findings are described above, in FEIR Section 3.16 (Socioeconomics) and in FEIR Volume II (Comments and Responses).

3.14.5 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to property acquisition, displacement of housing, and termination of leases.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to property acquisition, displacement of housing, and termination of leases.

Facts in Support of Findings

The facts in the support of the findings are described above, in FEIR Section 3.16 (Socioeconomics) and in FEIR Volume II (Comments and Responses).

3.15 Energy Resources

3.15.1 Use of Fuel or Energy

Operation of the RPA would require the consumption of energy as a result of LRT services and station operations. Although LRT services and station operations would consume energy, Metro's *Energy and Sustainability Policy* would be followed, which would serve to reduce Metro's use of fossil fuels through the use of ambient and renewable energy sources. The RPA would result in an annual reduction of energy consumed due to the reduction in VMT for both single-passenger vehicles and buses within the Expo Phase 2 study area. However, operation of the RPA would slightly increase Metro's energy consumption. As the RPA would result in less energy consumption than baseline conditions, the project would result in a beneficial energy effect. Energy usage under the RPA would not be considered wasteful or inefficient as more people would be moved through the transportation system. Additionally, the increased electricity energy demand of the RPA would be met by Los Angeles Department of Water and Power (LADWP) and Southern California Edison (SCE), as they would be able to provide the electricity required to operate the RPA while still providing adequate service to current customers.⁶ This would be a beneficial impact.

3.15.2 Findings

The Authority finds that implementation of the RPA would result in a beneficial impact related to energy resources.

⁶ Will serve letters from both LADWP and SCE are available for review in the *Energy Resources Technical Background Report*.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.17 (Energy Resources) and in FEIR Volume II (Comments and Responses).

3.15.3 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to energy resources.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to energy resources.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Section 3.17 (Safety and Security) and in FEIR Volume II (Comments and Responses).

3.16 Construction Impacts

3.16.1 Air Quality

Construction activities associated with the RPA would generate emissions that could result in an exceedance of localized significance thresholds (LST) established by the SCAQMD, and, therefore, could expose sensitive receptors to substantial pollutant concentrations. However, incorporation of the identified Best Available Control Measures (BACMs), construction emissions would be reduced to below the SCAQMD thresholds of significance.

The RPA could also result in airborne odors from operation of construction vehicles (i.e., diesel exhaust) and application of paint at the proposed stations. These emissions would only occur during daytime hours, would generally be restricted to the immediate vicinity of the construction site and activity, and would not be likely to affect a substantial number of people; therefore, the impacts would be considered less than significant.

3.16.2 Findings

The Authority finds that implementation of the RPA would result in less-than-significant construction-related air quality impacts.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.3 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to construction-related air quality.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to construction-related air quality.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.4 Global Climate Change

Greenhouse gas emissions would be released during construction of the RPA from operation of construction equipment and of worker and construction supply vendor vehicles. Temporary greenhouse gas emissions from construction activities are estimated at 18,282 metric tons of CO₂e per year. Although there would be greenhouse gas emissions during the construction period, they would not be cumulatively considerable, because they are temporary in nature and are spread out over the multi-year construction period. Therefore, the RPA is considered to have a less-than-significant effect.

3.16.5 Findings

The Authority finds that implementation of the RPA would result in less-than-significant construction-related global climate change impacts.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.6 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to construction-related global climate change.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to construction-related global climate change.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.7 Geology, Soils, and Seismicity

The project would include ground-disturbing activities, such as excavation and trenching for foundations and utilities (associated with the transit stations, aerial structures, and maintenance facility) and soil compaction and site grading associated with the implementation of a new track system, all of which would temporarily disturb soils.

The State Water Resources Control Board—through its NPDES Program—requires erosion and sediment controls for construction projects with more than 1 acre of land disturbance. Requirements associated with the NPDES Program include preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and a SUSMP, with construction-period and permanent erosion and sediment controls; describing construction-period erosion and sediment controls; and construction site inspection. The project would be required to comply with these existing regulations. Adherence to these requirements would prevent substantial on-site erosion and would ensure that the RPA would not result in substantial soil erosion or the loss of topsoil during construction; hence the impacts would be considered less than significant.

Findings

The Authority finds that implementation of the RPA would result in less-than-significant construction-related geology and soil impacts.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.8 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to construction-related geology and soil impacts.

3.16.9 Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to construction-related geology and soil impacts.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.10 Hazards and Hazardous Materials

Emergency response and emergency evacuation plans can be impacted by temporary or permanent circulation changes, including road closures, lane reconfigurations, and other access changes associated with construction activities. All construction activities would be conducted in accordance with the *Metro Fire/Life Safety Design Criteria* and/or *Metro Design Criteria*, as well as all safety procedures mandated by applicable federal, state, and local laws, thereby reducing the potential for interfering with adopted emergency response or evacuation plans, as such, the impact would be less than significant.

3.16.11 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to emergency response during construction.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.12 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to emergency response during construction.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to emergency response during construction.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.13 Hydrology and Water Quality

The applicable waste discharge requirements (WDRs) for the RPA are specified in the Municipal NPDES Permit, the Construction General Permit, the Industrial General Permit, and possibly, the Discharge of Non-Hazardous Contaminated Soils WDRs and the Construction Dewatering WDRs. As such, there are existing requirements and permit conditions that govern protection of water quality during construction and water quality impacts from construction of the RPA would be less than significant.

During construction of the RPA, temporary dewatering may be required if groundwater is encountered or construction occurs during the wet-weather season and dewatering of excavations is required. Groundwater is not expected to be a constraint since the proposed alignment is to be constructed almost entirely at grade or above grade with cuts less than 6 feet in depth. Construction activities would require coverage under the Construction General Permit

and preparation of a SWPPP, including spill prevention and control BMPs, waste and materials management BMPs, and other BMPs designed to protect both surface and groundwater quality. Municipal Codes require compliance with these General Permits ensuring that General Permit provisions are met. Further, if unanticipated groundwater is encountered, it would be subject to the Construction Dewatering General Permit; hence, the groundwater impacts from construction of the RPA would be less than significant.

3.16.14 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to water quality during construction.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.15 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to water quality during construction.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to water quality during construction.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.16 Noise and Vibration

Some activities, such as pile driving, pavement breaking, and the use of tracked vehicles (e.g., bulldozers), could result in perceptible levels of groundborne vibration. However, these activities would be limited in duration and vibration levels are likely to be well below thresholds for minor cosmetic building damage. Given that planned construction would consist of only a limited number of activities with potential to generate vibration, no special mitigation measures are required to avoid vibration impact during construction; hence, the impacts would be considered less than significant for the RPA.

3.16.17 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to vibration during construction.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.18 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to vibration during construction.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to vibration during construction.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.19 Energy Resources

Construction activities related to the proposed project would involve construction equipment that utilizes fossil fuel (mainly diesel) for equipment operation. In accordance with Metro's *Energy and Sustainability Policy*, the Authority would require the construction contractor to implement energy conserving BMPs. Such measures may include, but are not limited to, implementing a construction energy conservation plan, using energy-efficient equipment, consolidating material delivery to ensure efficient vehicle utilization, scheduling delivery of materials during non-rush hours to maximize vehicle fuel efficiency, encouraging construction workers to carpool, and maintaining equipment and machinery, especially those using gasoline and diesel, in good working condition. With implementation of these measures, the proposed project would not lead to a wasteful, inefficient, or unnecessary usage of fuel or energy; hence, impacts would be less than significant.

3.16.20 Findings

The Authority finds that implementation of the RPA would result in less-than-significant impacts related to the consumption of fuel or energy during construction.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

3.16.21 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. As such, implementation of any of the design options would result in less-than-significant impacts related to the consumption of fuel or energy during construction.

Findings

The Authority finds that implementation of the identified design options would result in less-than-significant impacts related to the consumption of fuel or energy during construction.

Facts in Support of Findings

The facts in support of the findings are described above, in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4. LESS-THAN-SIGNIFICANT ENVIRONMENTAL EFFECTS; MITIGATION INCORPORATED

The Authority finds that as discussed below, the following potentially significant impacts would be reduced to less than significant with implementation of the corresponding Mitigation Measures of the Expo Phase 2 Project. Explanations below apply to the RPA and consider all design options.

4.1 Transportation/Traffic

4.1.1 Spillover Parking

Based on the ridership and mode of transit access forecasts at the proposed RPA stations, the demand for parking would exceed the proposed supply at several stations, potentially resulting in some parking demand spilling over into adjacent neighborhoods. Spillover parking in the neighborhoods around the stations can be expected around all of the stations except the Sepulveda/National Station. If a parking shortage is determined to occur due to parking activity of LRT patrons, the Authority has adopted measures (described below and in the FEIR) committing the Authority to coordinate with Metro to reduce the effect on impacted neighborhoods. For those locations where station spillover parking cannot be addressed through implementation of a neighborhood permit program, alternative mitigation requirements include time-restricted, metered, and shared parking arrangements. Effects would be mitigated to a less-than-significant level.

4.1.2 On-Street Parking Capacity

In Segment 3a (Colorado), reconstruction of Colorado Avenue to accommodate the RPA would eliminate on-street parking on the south side of the street between 14th Street and Lincoln Avenue and on-street parking on either the north or south side of the street between Lincoln Avenue and 4th Street. Field surveys determined moderate to intensive use of these spaces, and little excess capacity on adjacent side streets. As a result, replacement parking would have to be accommodated with various options along Colorado Avenue. Mitigation has been proposed to address this impact.

4.1.3 Findings

The Authority adopts Finding 1 and Finding 2. The Authority adopts the following mitigation measures to reduce potentially significant impacts related to station spillover parking and loss of on-street parking to less-than-significant levels.

- **Mitigation Measure MM TR-4** In the quarter mile area surrounding each station where spillover parking is anticipated, a program shall be established to monitor the on-street parking activity in the area prior to the opening of service and shall monitor the availability of parking monthly for six months following the opening of service. If a parking shortage is determined to have occurred (i.e., existing parking space utilization increases to 100 percent) due to the parking activity of the light-rail transit (LRT) patrons,

Metro shall work with the appropriate local jurisdiction and affected communities to assess the need for and specific elements of a permit parking program for the impacted neighborhoods. The guidelines established by each local jurisdiction for the assessment of permit parking programs and the development of community consensus on the details of the permit program shall be followed. Metro shall reimburse the local jurisdictions for the costs associated with developing the local permit parking programs within one-quarter mile of the stations and for the costs of the signs posted in the neighborhoods. Metro will not be responsible for the costs of permits for residents desiring to park on the streets in the permit districts. For those locations where station spillover parking cannot be addressed through implementation of a permit program, alternative mitigation options include time-restricted, metered, or shared parking arrangements. Metro will work with the local jurisdictions to determine which option(s) to implement.

- **Mitigation Measure MM TR-9 Colorado Avenue** Replacement parking would be required along the impacted portions of Colorado Avenue. The potential replacement parking lots are listed below. Additional replacement options could include implementation of diagonal parking on adjacent streets (after extensive neighborhood outreach) or the implementation of design options, which would reduce the extent of parking impacts.
- **Mitigation Measure MM TR-9(a)** South side of Colorado Avenue, between 14th Street and 11th Street. Property would have to be acquired to provide replacement parking. Potential parcels on the south side of Colorado Avenue between 18th Street and 16th Street have been identified.
- **Mitigation Measure MM TR-9(b)** South side of Colorado Avenue, between 11th Street and 4th Street. Property would have to be acquired to provide replacement parking. A potential parcel at the northwest corner of 6th Street and Colorado Avenue has been identified.

Facts in Support of Findings

The discussion above and **MM TR-4, MM TR-9, MM TR-9(a), and MM TR-9(b)** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.2 (Transportation/Traffic) and in FEIR Volume II (Comments and Responses).

4.1.4 FEIR Design Options

Implementation of the Sepulveda Grade Separation, Maintenance Facility Buffer, Colorado Parking Retention, and the Colorado/4th Parallel Platform and South Side Parking design options would not cause additional parking intrusion into adjacent neighborhoods or commercial areas where the demand for parking at a station exceeds the proposed parking lot capacity.

Implementation of the Expo/Westwood Station No Parking Design Option would eliminate the 170 surface parking spaces that were dedicated to transit patrons at the Expo/Westwood Station. Implementation of mitigation measure MM TR-4 would reduce the impacts associated with station spillover parking to less than significant.

Implementation of the Sepulveda Grade Separation would eliminate the need for changes to the lane configurations on Sepulveda Boulevard. Therefore, the design option would eliminate impacts to on-street parking along Sepulveda Boulevard. Implementation of the Expo/Westwood

Station No Parking Design Option would include the provision of 20 parking spaces dedicated to neighborhood residents east of Westwood Boulevard and north of the LRT line. This would address community concerns regarding the loss of on-street parking spaces along Westwood Boulevard, and impacts would remain less than significant.

Implementation of the proposed Maintenance Facility Buffer, Colorado Parking Retention, and the Colorado/4th Parallel Platform and South Side Parking design would not alter the impacts to on-street parking beyond those evaluated in the FEIR. Impacts would remain less than significant.

Findings

The Authority makes Finding 1 and Finding 2. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to station spillover parking to less-than-significant levels with implementation of the Expo/Westwood Station No Parking Design Option.

Facts in Support of Findings

The discussion above and **MM TR-4, MM TR-9, MM TR-9(a), and MM TR-9(b)** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.2 (Transportation/Traffic) and in FEIR Volume II (Comments and Responses).

4.2 Cultural Resources

4.2.1 Archeological and Historic Resources

Construction of the RPA would involve ground-disturbing activities that may have a significant impact on unidentified archaeological resources. Grading, placement of fill, widening of the Exposition ROW, installation of aerial structures and retaining walls, as well as removal of existing track and railroad-related elements would impact the proposed California Register-eligible archaeological resource identified as the Santa Monica Air Line. The Authority adopts mitigation measures to reduce these potentially significant impacts to a less-than-significant level.

4.2.2 Findings

The Authority makes Finding 1. The Authority adopts the following mitigation measure to reduce potentially significant impacts related to cultural resources to less-than-significant levels.

- **Mitigation Measure MM CUL-1** Per CEQA Guidelines Section 21803.2(i), “a lead agency may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place.”

This project involves ground-disturbing activities throughout the area defined as the

archaeological APE. Prior to the commencement of construction activities, a Cultural Resources Treatment Plan, including a Discovery Plan, shall be prepared describing a site-specific archaeological monitoring program for high potential areas and treatment methods that will be implemented in the event archaeological resources are discovered during construction.

Because buried or otherwise obscured archaeological resources may be encountered, an archaeological monitoring program shall be implemented in accordance with the project's Treatment Plan. Archaeological monitoring of ground-disturbing activities shall be limited to those portions of the Expo ROW that are presently obscured by pavement and/or buildings, and on Venice Boulevard where there exists the possibility of encountering archaeological remnants associated with the Venice Short Line, unless it can be ascertained that previous ground disturbance has eliminated the potential to yield archaeological resources. Monitoring shall be conducted by a qualified archaeological monitor who is working under the direct supervision of a Project Manager or Principal Investigator certified by the Register of Professional Archaeologists (RPA) (qualifications derived from 36 CFR Part 61). Ground-disturbing activities include, but are not limited to, pavement/asphalt removal, boring, trenching, grading, excavating, and the demolition of building foundations. The archaeological monitor will observe ground-disturbing activities in these locations to a depth of 3 feet. A preconstruction information and safety meeting shall be held to make construction personnel aware of archaeological monitoring procedures and the types of archaeological resources that might be encountered.

In the event that archaeological resources are encountered during archaeological monitoring, the monitor may halt work in the immediate vicinity until the discovery is assessed by the project archaeologist and appropriate treatment is determined. Additional monitoring recommendations may be made at that time. If archaeological resources are encountered by construction personnel in portions of the project area where a monitor is not present, work in the immediate vicinity shall be suspended until the project archaeologist investigates the discovery and determines appropriate treatment.

In the event that human remains are discovered, work in the immediate vicinity of the discovery will be suspended and additional measures will be implemented as required by state law.

Upon completion of all ground-disturbing activities associated with this project, an Archaeological Resources Monitoring Report shall be prepared documenting construction activities observed, including copies of all daily archaeological monitoring logs. If discoveries are made during ground-disturbing activities, the report will also document the associated cultural materials and the methods of treatment as determined appropriate by the archaeologist.

- **Mitigation Measure MM CUL-2** Per CEQA Guidelines Section 21083.2(c), mitigation measures shall be required if unique archaeological resources are not preserved in place or not left in an undisturbed state. When this is not feasible, Section 15126.4(b)(3)(C) warrants a data recovery plan, "which makes provisions for adequately recovering scientifically consequential information from and about the historical resource," and "shall be prepared and adopted prior to any excavation being undertaken." The Expo Authority shall prepare such a plan to identify measures to reduce the project's impacts to the Santa Monica Air Line a California Register-eligible resource.

Facts in Support of Findings

The discussion above and **MM-CUL-1 and MM-CUL-2** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.7 (Cultural Resources) and in FEIR Volume II (Comments and Responses).

4.2.3 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measures **MM-CUL-1 and MM-CUL-2**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to cultural resources to less-than-significant levels with implementation of any of the identified design options.

Facts in Support of Findings

The discussion above and **MM-CUL-1 and MM-CUL-2** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.7 (Cultural Resources) and in FEIR Volume II (Comments and Responses).

4.3 Hydrology and Water Quality

4.3.1 Drainage

Development of the parking facility at the Expo/Westwood Station within Segment 1 (Expo ROW) would increase the amount of impervious area by approximately 1.1 acres, which could alter drainage patterns and contribute to localized flooding within this area and vicinity. This is a potentially significant impact; however, inclusion of detention facilities and various design specifications into the engineering documents as required by proposed mitigation would reduce potential effects of localized flooding within the 100-year flood zone in Segment 1 (Expo ROW) to a less-than-significant level.

4.3.2 Flooding

The proposed Expo/Westwood Station within Segment 1 (Expo ROW) would be located within an area designated as a 100-year flood hazard area, Zone A. Placement of the LRT system within a designated 100-year flood hazard area would result in a potentially significant impact. The Authority conducted a detailed survey in August 2009, which determined that with excavation required to construct the project the base of the proposed LRT guideway would not be 1 foot higher than the highest adjacent grade at some cross sections, and would not be eligible for the minimum conditions for approval of a Letter of Map Amendment application. As such, the proposed project alignment must be removed from the FEMA-defined 100-year flood hazard area, or potential flooding must be mitigated to ensure that the LRT system is not exposed to service disruption during a flood event and that people and structures are not

exposed to flood risks. The Authority would be required to apply for and obtain from FEMA Letter of Map Revision (LOMR) prior to operation of the RPA.

4.3.3 Findings

The Authority makes Finding 1. The Authority adopts the following mitigation measures to reduce potentially significant impacts related to localized flooding and flood hazards to less-than-significant levels.

- **Mitigation Measure MM WQ-1** The Expo Authority shall grade the Expo/Westwood Station and associated station parking facility and provide a stormwater drainage system with detention facilities and/or pervious pavement adequate to convey runoff from the Expo/Westwood Station during a 100-year storm event to prevent on-site flooding. The Expo Authority shall also implement stormwater detention facilities and/or pervious pavement for parking lots to reduce the off-site peak runoff from the Expo/Westwood Station and associated parking lots to existing condition levels. All detention facilities shall be designed to drain within 48 hours to minimize vector control and human safety concerns.

The Expo Authority shall include these facilities and their design specifications in the engineering plans. Use of pervious pavement shall be consistent with the Standard Urban Stormwater Mitigation Plan (SUSMP) and Municipal National Pollution Discharge Elimination System (NPDES) Permit limitations on infiltration best management practices (BMPs). Construction and operation of these BMPs shall be incorporated as part of the proposed project and subject to all applicable existing regulatory requirements.

- **Mitigation Measure MM WQ-2(b)** The Expo Authority shall design drainage and flood protection improvements to remove the portion of the RPA from the Federal Emergency Management Agency (FEMA)-defined 100-year flood hazard area. This shall include sufficient drainage structures to pass existing flood flow from areas up-gradient from the portion of the RPA to areas down-gradient, such that there is no net change in off-site flooding and flood flows or on storm drain system capacity. This may include rerouting of floodwaters from Westwood Boulevard at locations further north from the portion of the RPA to bypass the alignment corridor and Westwood Boulevard intersection.

Prior to the beginning of construction activities, the Expo Authority shall submit to FEMA an application for and obtain a Conditional Letter of Map Revision (CLOMR) and shall implement all conditions imposed by FEMA. The CLOMR would ensure that the project design is sufficient for removing the portion of the RPA from the 100-year flood hazard area. Prior to the beginning of operation, the Expo Authority shall obtain a Letter of Map Revision (LOMR), and potentially a No Rise Certificate, indicating that construction and implementation of the designed improvements have been conducted in accordance with the CLOMR and FEMA requirements and that the proposed project alignment corridor has been effectively removed from the 100-year flood hazard area.

Implementation of Segment 1 (Expo ROW) would use fill material, or place other structures (such as station platforms) in the floodplain, that could impede flood flows or reduce flood storage capacity. Therefore, MM WQ-2(b) shall not include use of fill material within an existing floodplain unless sufficient additional detention and flood storage is also provided. Any detention used as part of the flood improvements shall be designed to drain within 48 hours to minimize vector control and human safety issues.

The Expo Authority shall include any facilities used for flood improvements and their design specifications in the engineering drawings. As such, construction and operation of these facilities shall be incorporated as part of the proposed project and subject to existing regulatory requirements.

Facts in Support of Findings

The discussion above and **MM WQ-1 and MM WQ-2(b)** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.10 (Hydrology and Water Quality) and in FEIR Volume II (Comments and Responses).

4.3.4 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measure **MM WQ-1 and MM WQ-2(b)**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to localized flooding and flood hazards to less-than-significant levels with implementation of any of the identified design options.

Facts in Support of Findings

The discussion above and **MM WQ-1 and MM WQ-2(b)** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.10 (Hydrology and Water Quality) and in FEIR Volume II (Comments and Responses).

4.4 Land Use/Planning

4.4.1 Compatibility

Sensitive receptors in the vicinity of the proposed alignment and stations may experience disturbances such as degradation of visual quality or increased noise and air pollution as a result of transit operations, but incompatibility would only occur if the RPA caused degradation or disturbances that diminish the quality of a particular land use. The conclusions drawn from the land use compatibility evaluation relies on the aesthetics, air quality, and noise analyses conducted as part of the FEIR.

Operation of the RPA would not result in a SCAQMD emission threshold being exceeded. However, operations would result in potentially substantial noise impacts, including noise from LRV operations, audible warnings, and ancillary equipment. Changes in the visual quality vary by segment and a summary has been provided below.

Implementation of the Expo/Westwood Station within Segment 1 (Expo ROW) would result in street modifications, potential spillover parking, and increased bus service along Westwood Boulevard that would serve to alter the character of the station vicinity from that of a quiet

residential neighborhood with a vacant ROW that serves as a community open space to that of a transit station. However, Westwood Boulevard is a heavily traveled arterial street and implementation of the system within the Expo ROW would be consistent with the goals and policies of the *West Los Angeles Community Plan*. The proposed stations along Segment 1 (Expo ROW) would be designed according to the *Metro Design Criteria* and consistent with Expo Phase 1 stations. Therefore, Segment 1 (Expo ROW) would not result in an incompatibility with adjacent or surrounding land uses, and would not result in a degradation of the existing community.

Implementation of Segment 2 (Sepulveda to Cloverfield) would not be incompatible with, or substantially degrade the existing visual character or quality of the surrounding area. This segment is characterized by light industrial and commercial uses to the north of the Expo ROW, with residential uses to the south of Exposition Boulevard. With the exception of the area between Sawtelle Boulevard and Pico/Gateway Boulevard, the majority of the residential uses are screened from the Expo ROW by existing fencing, walls, and landscaping. Because the LRT guideway and the I-405 overpass would both be elevated in this portion of the corridor, the guideway would not add a visually meaningful element to the existing setting.

Proposed improvements within Segment 3a (Colorado) would not substantially degrade the existing visual character or quality of the site and its surroundings, nor damage or remove important aesthetic features as the predominately industrial and transportation-oriented character of the area would not change. The proposed Colorado/4th Street Station would be consistent with the transit-supportive and pedestrian-oriented character of downtown Santa Monica.

In conclusion, while implementation of transit throughout the alignment would change views, the long-term changes would be consistent for the reasons stated above. Air quality thresholds would not be exceeded and potential noise impacts would be mitigated throughout the alignment. Compliance with existing regulations and implementation of mitigation measures MM NOI-1 through MM NOI-4 would reduce potential noise impacts. Therefore, Implementation of the RPA would not result in an incompatibility with adjacent or surrounding land uses caused by degradation or disturbances that diminish the quality of a particular land use. This is a less-than-significant impact.

4.4.2 Findings

The Authority makes Finding 1. The Authority adopts mitigation measures MM NOI-1 through MM NOI-4, identified in Section 4.5 (Noise and Vibration) below to reduce potentially significant impacts related to land use compatibility to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM NOI-1 through MM NOI-4** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.11 (Land Use/Planning) and in FEIR Volume II (Comments and Responses).

4.4.3 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with

implementation of any of the design options with implementation of mitigation measure **MM NOI-1 through MM NOI-4**.

Findings

The Authority makes Finding 1. The Authority adopts mitigation measures **MM NOI-1 through MM NOI-4**, identified in Section 4.5 (Noise and Vibration) below to reduce potentially significant impacts related to land use compatibility to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM NOI-1 through MM NOI-4** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.11 (Land Use/Planning) and in FEIR Volume II (Comments and Responses).

4.5 Noise and Vibration

4.5.1 Light-Rail Vehicle Operation Impacts

According to the Federal Transit Administration (FTA) standards, within Segment 1 (Expo ROW), 108 single-family residences, 6 multi-family residences, 1 school, and 1 building that is used by the Boy Scouts of America are predicted to be affected by noise generated by the proposed project within this segment. Of these impacts, severe impact is predicted at 19 single-family residences and the building used by the Boy Scouts. All other single-family and multi-family residences and schools were determined to have moderate noise impacts, and are considered to be less-than-significant impacts.

Within Segment 2 (Sepulveda to Cloverfield), noise impact is predicted for 34 single-family residences, 54 multi-family residences, and the Lantana Campus. Of these impacts, 19 are predicted to be severe impacts. All other impacts were determined to be moderate, and as such as considered less-than-significant impact. Proximity to the track, a relatively high-speed profile, and low ambient noise levels in the area are the primary reasons for predicted impact in this area. In addition, the noise levels would be approximately 3 dB higher where the tracks would be on aerial structures for the Bundy, Pico, and Centinela grade separations. The addition of grade separation at Centinela Avenue did not change the results of the noise impact assessment.

With Segment 3a (Colorado), moderate noise impact is predicted for 31 multi-family residences and 1 school. The predicted impacts are at an eight-story multi-family residential building located on the north side of the Exposition ROW near 22nd Street and Colorado Boulevard, Crossroads School at 17th Street, and 18th Street Arts Center. Severe noise impact is predicted at the multi-family residential building and 18th Street Arts Center.

In total the RPA would result in 171 moderate noise impacts, and 67 severe noise impacts. Where predicted noise levels would result in moderate or severe impacts, as identified above, noise mitigation has been proposed to reduce operational noise levels below the FTA impact criteria for all identified receptors. Mitigation options include sound walls, berm, or equivalent, low-impact frogs, and/or improved sound insulation.

4.5.2 Audible Warning Impacts

The audible warnings at gate-protected at-grade crossings would consist of ringing bells on the masts of the crossing gates and sounding the low-volume horn (the quacker) on the vehicle. Light-rail vehicles will be equipped with quackers. The predicted L_{dn} from bell noise at land uses closest to the crossings were analyzed to determine potential impacts. Along the RPA, 12 receptors would be impacted by audible warnings. Impacts from the audible warnings would be mitigated by incorporating design standards adopted by the Authority and implementing measures developed and implemented on Phase 1 of the Metro Gold Line.

4.5.3 Wheel Squeal Impacts

Wheel squeal noise is generated by the slip-stick interaction of the wheels and rails as light-rail vehicles negotiate tight-radius curves. Wheel squeal can usually be controlled through (1) application of friction modifier to the railhead or the wheel tread, (2) application of lubricant to the gage face of the rail or the wheel flange, or (3) optimization of the wheel and rail profiles. Steps would be taken in the design and maintenance of the tracks to minimize or eliminate wheel squeal. These steps include use of resilient wheels, which are now standard on Metro light-rail systems, and a maintenance program of periodically truing wheels that eliminates wheel flats and maintains an optimum profile. In addition, lubrication using either onboard or wayside lubrication systems will be implemented where necessary to reduced wheel squeal. Wheel squeal could occur in Segment 1 (Expo ROW). Mitigation would reduce wheel squeal noise levels below the FTA's impact thresholds for all receptors along the RPA, and include eliminating wheel squeal through means such as vehicle mounted or wayside applicators of friction modifier.

4.5.4 Ancillary Equipment Impacts

TPSS units are the primary ancillary equipment associated with the proposed project with the potential to cause noise impacts. There would be approximately 8 to 9 TPSS units distributed along the proposed project, including 1 in the Maintenance Facility site. Several of selected sites are adjacent to residential land uses. As is standard in purchase contracts for TPSS units, maximum noise limits for both the transformer hum and any cooling systems would be included in the contract specifications to minimize the potential for noise impacts. It is anticipated that along the RPA, four locations would be affected by noise from TPSS units. Mitigation has been proposed to reduce this impact.

4.5.5 Groundborne Vibration and Noise

The potential for vibration impact is predicted at 24 residences in Segment 1 (Expo ROW) and 28 residences in Segment 3a (Colorado). No vibration impact at residences is predicted for Segment 2 (Sepulveda to Cloverfield). The 28 potential vibration impacts for Segment 3a (Colorado) would all be in the same building, an eight-story apartment building located a few feet from the right-of-way where the tracks would cross Olympic Boulevard. The potential for vibration impact is also predicted at the building on National Boulevard used by the Boy Scouts of America on Segment 1 (Expo ROW). Overall, the majority of the vibration impacts are at locations where there would be special trackwork for crossovers. This is because the banging as the wheels pass through the rail gaps in frogs causes vibration levels that are up to 10 dB higher than for normal track. Regardless, 53 sites along the RPA would be impacted by

operational vibration at residences and institutional buildings. Compliance with existing regulations and implementation of proposed mitigation would reduce this impact below the FTA impact criteria.

The potential for vibration impact also was identified at several recording studios and spaces used for audio/visual editing. The vibration sensitive commercial spaces were at buildings on the Lantana Campus, a building at 12312 Olympic Boulevard and Groove Masters Studio. Vibration mitigation such as ballasted mat or floating slab will be implemented to reduce impacts below FTA thresholds.

4.5.6 Ambient Noise Levels

Permanent sources of ambient noise associated with the RPA include light-rail vehicle operation, vehicular traffic, audible warnings, wheel squeal, ancillary equipment, and other sources, as described previously. Compliance with existing regulations and implementation of proposed mitigation measures would ensure that impacts would remain less than significant.

4.5.7 Findings

The Authority makes Finding 1. The Authority adopts the mitigation measures described below to reduce potentially significant impacts related to noise and vibration to less-than-significant levels.

- **Mitigation Measure MM NOI-1** Solid, impervious objects that block the direct path between the sound source and the receiver shall be installed at the proposed locations indicated in FEIR Table 3.12-10 to reduce the sound level at the receiver, with sound walls being the preferred option. Sound walls are a common noise mitigation measure and have been widely used on highways and on rail transit lines. Alternatively, the Expo Authority may construct a landscaped berm parallel to the rail line or use low berms with a low wall along the top. As long as the wall, berm, or berm/wall combination reaches the same elevation, the acoustical performance will be equivalent. Except where noise impacts are due to special trackwork at crossovers and turnouts, the predicted noise impact can be eliminated with sound walls or berms that extend to heights of:
 - 6 to 8 ft above the top of rail for ballast and tie track sections
 - 3.5 to 4 ft above the top of rail on aerial structures

The wall heights can be reduced by 6 to 12 inches if an acoustically absorbent surface treatment is used on the trackside of the wall.

A 7 to 9 dB reduction in operational noise can be expected in all locations where sound walls block direct lines of sight between the sound source and the receiver. This excludes receivers located in high-rise apartment buildings.

Additionally, in areas where crossovers would be located near sensitive receptors, low-impact frogs may be either an alternative to sound walls or supplemental measure to sound walls. There are several different types of low-impact frogs that could be used.

If during Final Engineering or Operations it is determined that measures described above are not practicable or do not provide sufficient noise mitigation, the Expo Authority or Metro, as appropriate, shall provide for sound insulation of residences and other noise-sensitive facilities as a another alternative that could be used. Sound insulation

involves upgrading or replacing existing windows and doors, and weather stripping windows and doors. Installing a mechanical ventilation system may be needed so that windows do not need to be opened for ventilation.

The mitigation measures will ensure that noise levels will be below the applicable FTA impact threshold for moderate noise impact.

- **Mitigation Measure MM NOI-2** The volume of crossing bells shall be reduced to within 5 dBA of the bottom of the CPUC-approved range. This step is sufficient to reduce the bell noise to below the applicable FTA impact thresholds.
- **Mitigation Measure MM NOI-3** If wheel squeal occurs that is sufficient to cause community noise levels that exceed the applicable FTA moderate impact thresholds, measures to reduce wheel squeal, such as rail or wheel lubrication, will be considered by Metro. If, by the end of the first year of service, noise from wheel squeal cannot be reduced to below the FTA moderate noise impact thresholds, the noise mitigation measures discussed in measure MM NOI-1 would be applied to further reduce levels of wheel squeal so that the levels are below the FTA moderate impact thresholds. No additional mitigation is required.
- **Mitigation Measure MM NOI-4** Noise levels would be sufficient to warrant mitigation at 4 of the 15 proposed TPSS sites; see FEIR Table 3.12-15. All noise impacts can be eliminated by specifying a noise limit of 44 dBA at 50 ft from any part of the TPSS units that would be used at sites 1, 2, 3, and 4.
- **Mitigation Measure MM NOI-6** Further site-specific testing shall be performed during Final Design where potential for vibration impact has been identified. Where vibration impact is still predicted, the vibration energy transmitted into the ground shall be decreased by (1) use of low impact frogs to reduce the banging at special trackwork, and/or (2) installation of a resilient layer between the tracks and the ground. There are a number of different approaches to installing resilient elements in track to reduce vibration. Vibration-reducing design specifications for the track sections shall be determined in consultation with a qualified vibration scientist or engineer during the design phase.

The specific locations where vibration mitigations are expected to be required are listed in Table 3.12-24 (Anticipated Vibration Mitigation Locations) of the FEIR. Final type, location, and extent of such mitigations will be determined in Final Design. The mitigation measures will be designed to ensure that vibration levels will be below the FTA impact threshold that is applicable to Detailed Vibration Assessments. The threshold for FTA Category 2 (residential) land uses is a band-maximum vibration level of 72 VdB at frequencies greater than 8 Hz.

Facts in Support of Findings

The discussion above and **MM NOI-1 through MM NOI-6** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.12 (Noise and Vibration) and in FEIR Volume II (Comments and Responses).

4.5.8 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options implementation of mitigation measure **MM NOI-1 through MM NOI-6**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures (as further described in the FEIR) to reduce potentially significant impacts related to noise and vibration to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM NOI-1 through MM NOI-6** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.12 (Noise and Vibration) and in FEIR Volume II (Comments and Responses).

4.6 Paleontological Resources

The RPA has the potential to adversely affect sediments of high paleontological sensitivity. Portions of the study area are underlain with Quaternary old alluvial fan deposits of Middle to Late Pleistocene age known to contain important vertebrate paleontological resources at depths ranging from the surface to approximately 55 feet below the surface. One vertebrate fossil locality is known to be within the project alignment in the Quaternary old alluvial fan deposits. Another dozen vertebrate fossil localities are known from these sediments to be within 1 mile of the project alignment. As such, the study area is highly sensitive for paleontological resources at variable depths and should be considered highly sensitive for any excavations more than 4 feet below the surface. Mitigation has been proposed to protect these paleontological resources and would require the preparation of a Paleontological Resources Management Plan, and monitoring at the surface and below in Segment 1 (Expo ROW) and Segment 3a (Colorado) where there are known surface exposures of Quaternary old alluvial fan deposits of high paleontological significance.

4.6.1 Findings

The Authority makes Finding 1. The Authority adopts the mitigation measure described below to reduce potentially significant impacts related to paleontological resources to less-than-significant levels.

- **Mitigation Measure MM PAL-1** Per CEQA Guidelines, the Expo Authority shall retain a qualified paleontologist to prepare and implement a Paleontological Resources Management Plan (PRMP) to the standards detailed in the *Paleontological Resources Technical Background Report*.

Monitoring is required at the surface and below Segment 1 (Expo ROW) from station 540+00 to 600+00 where there are known surface exposures of Quaternary old alluvial fan deposits of high paleontological sensitivity.

In other project areas, the paleontologist will examine subsurface work to adjust

monitoring to cover Quaternary old alluvial fan sediments only.

Upon completion of all monitoring and mitigation activities, the paleontologist will submit a final report to the Expo Authority summarizing the work and confirming that all recommendations were implemented.

Facts in Support of Findings

The discussion above and **MM PAL-1** provide facts in support of the findings. Additional facts in support of the findings are described in Section 3.13 (Paleontological Resources) and in FEIR Volume II (Comments and Responses).

4.6.2 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measure **MM PAL-1**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to paleontological resources to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM PAL-1** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.13 (Paleontological Resources) and in FEIR Volume II (Comments and Responses).

4.7 Parks and Community Facilities

4.7.1 Disruption of Community Facilities

Permanent loss of on-street parking near Memorial Park would occur under the RPA. Some parking spaces would be lost along the south side of Colorado Avenue from 14th Street to the terminus. However, the park is primarily accessed from a parking lot on 14th Street that provides off-street parking for the site. Access to Memorial Park under the RPA would not be affected, as the on-street parking loss is distant from the park, and the park has its own parking lot. In addition, the loss of this parking could be offset by the expected increase in accessibility via transit. No alteration of park service areas would result from implementation of the RPA as Memorial Park does not rely exclusively on on-street parking along Colorado Avenue. Regardless, proposed mitigation would require the provision of replacement parking in the general vicinity of Memorial Park which would reduce access impacts to community facilities resulting from loss of on-street parking to less-than-significant level.

Additionally, parking would be affected at the Colorado Court Project, a 44-unit affordable-housing project with community rooms open to the public along the south side of Colorado Avenue. On-street parking is available on Colorado Avenue. This facility relies on the existing on-street parking, and thus, loss of parking here is a potentially significant impact.

Implementation of the RPA would result in the permanent loss of 16 on-street parking spaces along the south side of Colorado Avenue between 7th and 4th Streets. Traffic mitigation (refer to Section 4.1 [Transportation/Traffic]) would require the provision of replacement parking in this area and other proposed mitigation would require that replacement parking be provided to reduce impacts associated with the permanent loss of parking along Colorado Avenue, as described above. This impact would be less than significant with mitigation incorporated.

4.7.2 Findings

The Authority makes Finding 1. The Authority adopts the mitigation measure described below to reduce potentially significant impacts related to the disruption of community facilities to less-than-significant levels.

- **Mitigation Measure MM PAR-1** For those community facilities that utilize on-street parking, the Expo Authority shall provide reasonably proximate parking to replace permanently lost parking spaces based on the number of removed spaces that are utilized. Prior to construction of the RPA, the Expo Authority will complete a parking demand study for affected community facilities to determine the appropriate amount of parking replacement that would be required. The location of the replacement parking would be in accordance with the requirements listed in MM TR-9, MM TR-9(a) and MM TR-9(b) in FEIR Section 3.2 (Transportation/Traffic).

Facts in Support of Findings

The discussion above and **MM PAR-1** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.14 (Parks and Community Facilities) and in FEIR Volume II (Comments and Responses).

4.7.3 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measure **MM PAR-1**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to reduce potentially significant impacts related to the disruption of community facilities to less-than-significant levels.

Facts in Support of Findings

The discussion above and MM PAR-1 provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.14 (Parks and Community Facilities) and in FEIR Volume II (Comments and Responses).

4.8 Safety and Security

4.8.1 Emergency Response

Potential delays to emergency response vehicles could occur at at-grade crossings when the LRVs cross the street. Unlike at intersections with traffic signals where emergency vehicles can pass through the intersections at reduced speeds even when signal light is red, they will not be able to cross through the at-grade crossings when the railroad gates are down. The gate down time period is 40 seconds, but gates could be down for up to 82 seconds in some instances. Nevertheless, response times as indicated by the various police and departments along the proposed alignment, or within proposed station areas are anticipated to be within the averages for these departments.

With regard to emergency access across the LRT tracks on portions of Segment 3a (Colorado), barriers, fencing, and/or mountable curbs would be placed between the LRT tracks and the adjacent street lanes in accordance with CPUC GO 143-B. Intersections on Colorado Boulevards would not have crossing gates and thus emergency access would not be restricted. As required by each of the cities, all roadways would be reconfigured to meet the applicable jurisdictions' safety criteria for emergency vehicles.

Proposed mitigation would ensure that community safety response providers have knowledge and understanding of the Metro operating emergency response procedures. Thus, these jurisdictions would be able to provide a fast, controlled, and coordinated response to the various types of emergencies that may occur as a result of operation of the RPA. In addition, the Authority will assist and coordinate with Metro and community safety providers to effectively reach non-transit emergencies. Therefore, impacts to the delivery of community safety services would be considered less than significant.

4.8.2 Findings

The Authority makes Finding 1 and Finding 2. The Authority adopts the mitigation measure described below to reduce potentially significant impacts related to the community safety services to less-than-significant levels.

- **Mitigation Measure MM SAF-1** Prior to commencement of operation of the project, Metro shall coordinate with the cities of Culver City, Santa Monica, and Los Angeles and inform the appropriate community safety provider of Metro's emergency response procedures as incorporated into Metro's standard operating procedures. Metro shall provide a detailed description of their emergency response procedures so as to provide other public safety providers with the knowledge of Metro's response plan in order to provide a fast, controlled and coordinated response to the various types of emergencies that may occur on the Metro rail system. Additionally, Metro shall encourage the cities of Culver City, Los Angeles, and Santa Monica to update their emergency response procedures to address implementation of the RPA.

Facts in Support of Findings

The discussion above and **MM SAF-1** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.15 (Safety and Security) and in FEIR Volume II (Comments and Responses).

4.8.3 FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measure **MM SAF-1**.

Findings

The Authority makes Finding 1 and Finding 2. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to reduce potentially significant impacts related to the community safety services to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM SAF-1** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Section 3.15 (Safety and Security) and in FEIR Volume II (Comments and Responses).

4.9 Construction Impacts

4.9.1 Traffic/Transportation

Partial roadway closures of less than one month would occur within Segment 1 (Expo ROW) on Venice Boulevard, Exposition Boulevard, Bagley Avenue, Palms/National Boulevard, Motor Avenue, Overland Avenue, Westwood Boulevard, and Military Avenue, and within Segment 2 (Sepulveda to Cloverfield) on Sepulveda Boulevard, Sawtelle Boulevard, Exposition Boulevard, Pico Boulevard, Barrington Avenue, Bundy Drive, Centinela Avenue, Stewart Street, 26th Street, and Cloverfield Boulevard. However, it is anticipated that traffic in both directions could be maintained. Construction along Segment 3a (Colorado) would result in the closure of one or more traffic lanes along Colorado Avenue for more than one month. However, implementation of proposed mitigation would serve to reduce impacts associated with closure of lanes.

While much of the construction along Segment 1 (Expo ROW) and Segment 2 (Sepulveda to Cloverfield) would be located within the existing Exposition ROW, construction activities could result in traffic diversions through residential areas. Although through traffic lanes will be provided to the extent feasible, traffic diversions could occur as a result of the street reconstruction along these segments. Residential streets could see an increase in traffic during construction activities. Construction activities within Segment 3a (Colorado) would result in extensive lane closure and delays as the street would be reconfigured to allow for the LRT guideway. As a result, drivers may choose to divert through the multi-family residential area located north of Colorado Avenue. Traffic may use side streets through this area, including Broadway. These impacts would only be temporary during the construction period and implementation of the proposed mitigation would reduce the impacts to a less-than-significant level. Mitigation is intended to smooth traffic flow in and around construction activity to reduce the tendency for diversions through residential areas.

Construction activities would result in the long-term loss of on-street parking potentially for more than three months in portions of the RPA to ensure that traffic lanes remain open throughout the construction phases, to accommodate lane modifications, and as a result of the reconfiguration

of certain roadways. Many of the businesses adjacent to the construction activities along Segment 1 (Expo ROW) and Segment 2 (Sepulveda to Cloverfield) would remain open to pedestrian access and many have surface parking lots to accommodate customers during construction. Within Segment 3a (Colorado), pedestrian access to many of the Colorado-facing businesses may be impacted. However, mitigation has been proposed to reduce the impacts to an acceptable level.

Findings

The Authority makes Finding 1 and Finding 2. The Authority adopts the mitigation measures described below to reduce potentially significant traffic-related construction impacts to less-than-significant levels.

- **Mitigation Measure MM CON-1** To ensure that continued vehicular access to community facilities is maintained, the Expo Authority shall provide at least one lane of traffic in each direction on access cross streets that are not going to be dead-ended during construction. If one lane of traffic cannot be maintained, the Expo Authority shall provide a detour route for motorists.
- **Mitigation Measure MM CON-2** Before the start of construction, Worksite Traffic Control Plans (WTCP) and Traffic Circulation Plans, including identification of detour requirements, will be formulated in cooperation with the City of Los Angeles, City of Santa Monica, Culver City and other affected jurisdictions (County, State) in accordance with the Work Area Traffic Control Handbook (WATCH) manual and Manual on Uniform Traffic Control Devices (MUTCD) as required by the relevant municipality. The WTCPs will be based on lane requirements and other special requirements defined by the Los Angeles City Department of Transportation (LADOT), the City of Santa Monica, and Culver City for construction within their city and from other appropriate agencies for construction in those jurisdictions. Also, the WTCP's shall be designed to maintain designated Safe Routes to School wherever possible during times of the year when nearby schools are in session.
- **Mitigation Measure MM CON-3** No designated Major or Secondary Highway will be closed to vehicular or pedestrian traffic except at night or on weekends, unless approval is granted by the jurisdiction in which it is located.
- **Mitigation Measure MM CON-4** The Expo Authority's contractor will develop preferred haul route plans for the removal of excavated material. Construction will be scheduled and haul routes will be planned to minimize conflicts during school arrival and dismissal times.
- **Mitigation Measure MM CON-5** The Expo Authority will coordinate with other major construction projects within a 1-mile radius of the construction site to avoid, to the maximum extent practicable, overlapping haul routes with other public or private construction projects.
- **Mitigation Measure MM CON-6** Unless otherwise specified in the Worksite Traffic Control Plan, the Expo Authority shall maintain access to the businesses that rely on on-street parking and pedestrian access during construction. If it is necessary to temporarily restrict access to a business, the Expo Authority shall provide the facility advance notice of restrictions. Unless otherwise specified in the Worksite Traffic Control Plan, the Expo Authority shall schedule access restrictions to off-peak hours or during times when the business is closed and shall not fully restrict access for the total hours of operation of a

business on any given day of operation.

- **Mitigation Measure MM CON-7** Relative to maintaining access to businesses, construction activities shall be sequenced to minimize the temporary removal of multiple blocks of on-street parking at one time unless otherwise specified by the Worksite Traffic Control Plan.
- **Mitigation Measure MM CON-8** Contractors shall use temporary special signage to inform the public of closure information in advance of temporary closures. Signage shall also provide special access directions, if warranted.

Facts in Support of Findings

The discussion above and **MM CON-1 through MM-CON-8** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of **MM CON-1 through MM CON-8**.

Findings

The Authority makes Finding 1 and Finding 2. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to reduce potentially significant traffic-related construction impacts to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-1 through MM-CON-8** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4.9.2 Aesthetics

Minimal formal landscaping exists along the RPA alignment, except for the Sara Berman Greenway (just west of Westwood Boulevard to just west of Military Avenue) within Segment 1 (Expo ROW). Construction of the proposed project could potentially degrade the visual quality of the Sara Berman Greenway; however, proposed mitigation would reduce this impact by requiring the placement of construction barriers around the greenway, and in the event that damaged is caused during construction activities, the greenway shall be repaired as appropriate and would include the provision of replacement landscaping.

Finding

The Authority adopts Finding 1. The Authority adopts the mitigation measure described below to reduce potentially significant aesthetic-related construction impacts to less-than-significant levels.

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- **Mitigation Measure MM CON-9** To the extent possible, the Expo Authority shall protect the Sara Berman Greenway during construction of Segment 1 (Expo ROW), including the placement of a construction barrier around the perimeter of the Greenway, and notifying contractors of restrictions. Substantial damage to the Greenway caused by construction activities shall be repaired as appropriate during or after the course of construction, which could include the provision of replacement landscaping.

Facts in Support of Findings

The discussion above and **MM CON-9** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Construction of the Expo/Westwood Station No Parking Design Option would not involve additional work near the Sara Berman Greenway beyond that contemplated for the proposed project. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measure **MM CON-9**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to reduce potentially significant aesthetic-related construction impacts to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-9** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4.9.3 Biological Resources

Bird nests were observed within the trees in the residential areas adjacent to Segment 1 (Expo ROW) during the biological field survey conducted for the project. It could not be determined at the time of the field survey which species occupied these nests. The study area also presents many nesting opportunities for birds. Areas with suitable nesting habitat include the trees lining the alignment, along proposed street widenings, and trees within the property of the proposed maintenance facility. The removal of an active nest of a MBTA and/or *Fish and Game Code* protected species would be a violation of the MBTA and/or *Fish and Game Code*. The magnitude of the impact would depend on the species affected. As such, implementation of the proposed project could impact MBTA protected species and/or avian species protected under Section 3503 of the *Fish and Game Code*; however, implementation of the proposed mitigation would reduce impacts to a less-than-significant level.

Finding

The Authority makes Finding 1. The Authority adopts the mitigation measure described below to reduce potentially significant construction-related protected species impacts to less-than-significant levels.

- **Mitigation Measure MM CON-10** During construction of the RPA, the removal of trees, shrubs, or weedy vegetation should be avoided during the February 1 through August 31 bird nesting period. If the removal of trees, shrubs, or weedy vegetation were to occur during the nesting period, a survey for nesting birds shall be conducted by a qualified wildlife biologist no earlier than 14 days prior to the removal of trees, shrubs, grassland vegetation, buildings, or other construction activities. Survey results shall be valid for 21 days following the survey. The area surveyed should include all construction areas with the potential to support nesting birds protected by the MBTA and/or Section 3503 of the *Fish and Game Code*, as well as areas within 75 feet of the boundaries, as practicable or as determined by the biologist in the field, of the areas to be cleared or as otherwise determined by the biologist. If no vegetation or tree removal is proposed during the nesting period, no surveys would be required.

In the event that an active nest is discovered in the areas to be cleared, or in other habitats within 75 feet of construction boundaries, clearing and construction should be postponed within this area for at least two weeks or until a wildlife biologist has determined that the young have fledged (left the nest), the nest is vacated, and there is no evidence of second nesting attempts. Other buffers or construction requirements may be determined by the wildlife biologist in the field as practicable.

Facts in Support of Findings

The discussion above and **MM CON-10** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of **MM CON-10**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant construction-related protected species impacts to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-10** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4.9.4 Hazards and Hazardous Materials

Portions of the proposed project follow the existing Exposition ROW, which has remnants of the old railroad tracks, creosote-soaked railroad ties, and associated soils that may be contaminated, potentially with lead arsenates, as they were encountered during construction of the Expo Phase 1. Exposure during soil disturbance may pose a human health risk. Some areas along the RPA could also be contaminated from the unauthorized release of other hazardous substances into the soil. In addition, construction activities would also occur on or near documented hazardous materials sites.

Demolition activities would require the removal of temporary or permanent structures along the RPA. If buildings proposed for demolition were constructed prior to 1970, these buildings could contain asbestos and/or lead-based paints, and their demolition might require abatement prior to construction activities to avoid exposure by construction workers and the public in the vicinity. With demolition activities, construction workers and nearby workers and/or residents will be protected from potential exposure to airborne lead-based paint dust, asbestos fibers, and/or other contaminants by preparing and implementing a Site Health and Safety Plan that meets OSHA requirements prior to commencement of work in any contaminated area.

The project could create the potential for upset or accident conditions during construction activities that could release hazardous materials; however, compliance with federal, state, and local laws and regulations governing hazardous materials use, disposal, and emergency response in addition to the mitigation measures below would reduce potential health risks to a less-than-significant level.

Finding

The Authority makes Finding 1. The Authority adopts the mitigation measures described below to reduce potentially significant construction-related hazards and hazardous materials impacts to less-than-significant levels.

- **Mitigation Measure MM CON-11** Prior to any ground disturbance or demolition, the Expo Authority shall:
 - Prepare an Environmental Site Assessment (ESA Phase II) for specific sites in the ESA Phase I prepared for the proposed project. The Phase IIs shall include soil sampling for contamination on sites where releases of hazardous materials are known and groundwater sampling where soil contamination is detected. Based on the age of structures identified along the alignment, the potential for exposure to mold, lead, and asbestos should also be studied.
 - If contaminated areas are identified within the construction area, the Expo Authority shall coordinate with the appropriate regulatory agencies to determine the need for further investigation and/or remediation of the contaminated site.
- **Mitigation Measure MM CON-12** In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment during construction of the RPA is encountered, construction activities in the immediate vicinity of the contamination shall cease immediately. If contamination is encountered, measures shall be prepared and implemented that (1) identifies the contaminants of concern and (2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures would include a

range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., City Fire Department). A Site Health and Safety Plan that meets Cal-Office of Safety and Health Administration (OSHA) requirements shall be prepared and in place prior to commencement of work in any contaminated area.

Facts in Support of Findings

The discussion above and **MM CON-11 and MM CON-12** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of **MM CON-11 and MM CON-12**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant construction-related hazards and hazardous materials impacts to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-11 and MM CON-12** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4.9.5 Land Use/Planning

During project construction, access to land uses would be periodically impacted. Lane restrictions (e.g., no left turns, right in/right out only) would be required along adjacent roads and intersections during construction. If these restrictions were to result in permanent behavioral shifts with regards to access to businesses or community services, this would be considered an impact. However, proposed mitigation would ensure that at least one lane of traffic is provided in each direction or a detour route is provided during any restrictions in order to ensure access is maintained to adjacent properties. Therefore, the impacts would be considered less than significant.

Finding

The Authority makes Finding 1. The Authority adopts mitigation measure **MM CON-6**, described above to reduce potentially significant impacts related to the physical division of a community during construction to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-6** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of **MM CON-6**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measure to reduce potentially significant impacts related to the physical division of a community during construction to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-6** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4.9.6 Noise and Vibration

The construction of the RPA guideway requires use of heavy earth-moving equipment, pneumatic tools, generators, concrete pumps, and similar equipment. Without noise mitigation, construction of the project is expected to generate noise levels that exceed the limits in the *Metro Design Criteria*. Mitigation measures would reduce noise levels below the limits of the *Metro Design Criteria* and the city construction noise thresholds; hence, the impacts would be considered less than significant for the RPA.

Findings

The Authority makes Finding 1. The Authority adopts the mitigation measure described below to reduce potentially significant construction-related noise and vibration impacts to less-than-significant levels.

- **Mitigation Measure MM CON-13** The Expo Authority's contractor shall develop a Noise Control Plan demonstrating how he will achieve the more restrictive of the *Metro Design Criteria* noise limits and the noise limits of the city noise control ordinance. The plan shall include measurements of existing noise, a list of the major pieces of construction equipment that will be used, and predictions of the noise levels at the closest noise-sensitive receptors (residences, hotels, schools, churches, temples, and similar facilities). The Noise Control Plan will need to be approved by the Expo Authority prior to initiating construction.

Where the construction cannot be performed in accordance with the requirements of the Metro or applicable city noise limits, the contractor shall investigate alternative construction measures that would result in lower sound levels. The contractor shall

conduct noise monitoring to demonstrate compliance with contract noise limits.

- **Mitigation Measure MM CON-14** The contractor shall utilize a combination of the following options of best management practices for noise abatement to comply with the *Metro Design Criteria*:
 - The contractor shall utilize specialty equipment equipped with enclosed engines and/or high-performance mufflers as commercially available.
 - The contractor shall locate equipment and staging areas as far from noise-sensitive receptors as possible.
 - The contractor shall limit unnecessary idling of equipment.
 - The contractor shall install temporary noise barriers as determined by the Noise Control Plan.
 - The contractor shall reroute construction-related truck traffic away from residential streets to the extent permitted by the relevant municipality.
 - The contractor shall avoid impact pile driving near noise-sensitive receptors (residences, hotels, schools, churches, temples, and similar facilities) where possible. Where geological conditions permit their use, drilled piles or a vibratory pile driver is generally quieter.

Facts in Support of Findings

The discussion above and **MM CON-13 and MM CON-14** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measures **MM CON-13 and MM CON-14**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant construction-related noise and vibration impacts to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-13 and MM CON-14** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4.9.7 Parks and Community Facilities

Construction of the project would result in the temporary loss of access and parking when the community facility abuts the RPA. However, construction in any one area would be of limited

duration as demolition, grading, and construction would be phased and therefore occur in a progression. While it may be necessary to temporarily restrict access to, or parking for, community facilities during construction, these restrictions would be temporary and would cease upon completion of construction. Construction of the RPA may disrupt community facilities and services through a reduction in access to facilities or cause a substantial alteration of service areas to community facilities along the RPA. However, with implementation of proposed mitigation, these impacts would be considered less than significant.

Finding

The Authority adopts Finding 1. The Authority adopts the mitigation measures provided below to reduce potentially significant impacts related to parks and communities facilities during construction to less-than-significant levels.

- **Mitigation Measure MM CON-1** Listed above.
- **Mitigation Measure MM CON-15** Unless otherwise specified in the Worksite Traffic Control Plan, the Expo Authority shall maintain vehicular and pedestrian access to the identified community facilities (refer to FEIR Table 4.6-9 [Access, Parking, and Service Area Impacts on Community Facilities]) during construction. If it is necessary to temporarily restrict access to a community facility, the Expo Authority shall provide the facility notice of any restriction. Unless otherwise specified in the Worksite Traffic Control Plan, the Expo Authority shall schedule access restrictions to off-peak hours or during times when the community facility is closed and shall not restrict access for the total hours of operation of a community facility on any given day of operation.
- **Mitigation Measure MM CON-16** Near the identified community facilities construction activities shall be sequenced to minimize the temporary removal of multiple blocks of on-street parking at one time unless otherwise specified by the Worksite Traffic Control Plan.

Facts in Support of Findings

The discussion above and **MM CON-1, MM CON-15, and MM CON-16** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measures **MM CON-1, MM CON-15, and MM CON-16**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to parks and communities facilities during construction to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-1, MM CON-15, and MM CON-16** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4.9.8 Safety and Security

Construction of the RPA could substantially limit the delivery of community safety services, such as police, fire, or emergency services, to locations along the proposed alignment. However, compliance with proposed mitigation would reduce impacts to a less-than-significant level.

Finding

The Authority adopts Finding 1. The Authority adopts the mitigation measures provided below to reduce potentially significant impacts related to the delivery of community safety services during construction to less-than-significant levels.

- **Mitigation Measure MM CON-17** The Expo Authority shall maintain access to all police and fire stations at all times during construction.
- **Mitigation Measure MM CON-18** During construction of the RPA, the Expo Authority shall coordinate with the cities of Culver City, Santa Monica, and Los Angeles and inform the appropriate community safety provider of the construction emergency response procedures as incorporated into the Contractor's Systems Safety Program Plan. The Plan will include a detailed description of all emergency response procedures that shall be implemented by the contractor, so as to provide other public safety providers with the knowledge of the contractor's response plan in order to provide a fast, controlled, and coordinated response to the various types of emergencies. Additionally, the Expo Authority shall encourage the cities of Culver City, Santa Monica, and Los Angeles to update their emergency response procedures to address construction of the RPA.

Facts in Support of Findings

The discussion above and **MM CON-17** and **MM CON-18** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measures **MM CON-17** and **MM CON-18**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to the delivery of community safety services during construction to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-17** and **MM CON-18** provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

4.9.9 Socioeconomics

Construction associated with the RPA could last up to four years. Therefore, businesses located in close proximity to or along the streets intended for construction could be disrupted as a result of noise, air quality, access, traffic, aesthetics, and a number of other construction-related issues identified in the FEIR. Mitigation proposed to address the construction-related issues would also apply to impacts to local businesses.

Finding

The Authority makes Finding 1. The Authority adopts the mitigation measures provided below to reduce potentially significant impacts related to local businesses during construction to less-than-significant levels.

- **Mitigation Measure MM CON-1**—Listed Above
- **Mitigation Measure MM CON-2**—Listed Above
- **Mitigation Measure MM CON-3**—Listed Above
- **Mitigation Measure MM CON-13**—Listed Above
- **Mitigation Measure MM CON-14**—Listed Above

Facts in Support of Findings

The discussion above and **MM CON-1, MM CON-2, MM CON-3, MM CON-13, and MM CON-14**, provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

No impact beyond that discussed above for the RPA would occur with implementation of any of the identified design options. Impacts would remain at less than significant levels with implementation of any of the design options with implementation of mitigation measures **MM CON-1, MM CON-2, MM CON-3, MM CON-13, and MM CON-14**.

Findings

The Authority makes Finding 1. The Authority adopts the above mitigation measures to reduce potentially significant impacts related to local businesses during construction to less-than-significant levels.

Facts in Support of Findings

The discussion above and **MM CON-1, MM CON-2, MM CON-3, MM CON-13, and MM CON-14**, provide facts in support of the findings. Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses).

5. SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

The FEIR identified the following significant or potentially significant operational and construction-phase related impacts as remaining significant and unavoidable because the impacts cannot be mitigated to a less-than-significant level, despite the implementation of mitigation measures or selection of alternatives to reduce these impacts. As stated in CEQA Guidelines Section 15091, the Authority finds that “Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible...mitigation measures or project alternatives” identified in the FEIR. The Authority further findings that RPA has been designed in a manner that reduces impacts to the extent feasible, while achieving the specific economic, legal, social and technological benefits of the Project. With regard to each significant effect that is not avoided or that is not substantially lessened, the Authority is adopting a Statement of Overriding Consideration in accordance with CEQA Guidelines Section 15093.

5.1 Aesthetics

5.1.1 Visual Character

Implementation of the Expo/Westwood Station and the associated parking area in Segment 1 (Expo ROW) would represent a substantial change in the surrounding area’s character and visual quality, which would be a significant impact. Although the Expo ROW served as a rail corridor up until the mid-1980s, the surrounding community in Segment 1 (Expo ROW) has grown accustomed to the existing visual character, identified as moderate high in the FEIR. No feasible mitigation measure other than conformance to the *Metro Design Criteria* has been identified to reduce this impact. Consequently, a significant and unavoidable visual impact would occur in Segment 1 (Expo ROW) of the RPA.

The Expo/Westwood Station No Parking Design Option would eliminate the 170 surface parking spaces at the Expo/Westwood Station. However, 20 parking spaces would be dedicated to neighborhood residents east of Westwood Boulevard and north of the LRT line to address community concerns regarding on-street parking losses. While removing the 170 surface parking spaces would lessen the change in visual character, implementation of this design option would still result in a significant and unavoidable impact because the associated street modification, removal of a limited number of street trees, and introduction of the LRT system would result in a change in the area’s character and visual quality as described above.

Finding

The Authority makes Finding 1 and Finding 3. Although conformance with *Metro Design Criteria*, which would include public art, landscaping to screen the Expo/Westwood Station from view, and other design features that enhance the visual quality of the community could reduce impacts to the visual character of the area, no feasible mitigation measures have been identified to reduce this impact to less than significant. Therefore, the change to the visual character of the area would remain significant and unavoidable. With regard to each significant effect that is

not avoided or that is not substantially lessened, the Authority is adopting a Statement of Overriding Consideration in accordance with CEQA Guidelines Section 15093.

Facts in Support of Findings

The discussion above and the *Metro Design Criteria* provide facts in support of the findings. The construction of a major new transit facility necessarily involves a change in the aesthetic environment in the immediate vicinity of the project. The *Metro Design Criteria* and other measures adopted by the Authority will reduce the aesthetic effects, but it is not feasible to avoid or to substantially lessen the aesthetic effects if the benefits of the Project described in the FEIR and the Statement of Overriding Consideration are to be achieved. Additional facts in support of the findings are described in FEIR Section 3.3 (Aesthetics) and in FEIR Volume II (Comments and Responses).

FEIR Design Options

The Expo/Westwood Station No Parking Design Option would eliminate the 170 surface parking spaces at the Expo/Westwood Station. However, 20 parking spaces would be dedicated to neighborhood residents east of Westwood Boulevard and north of the LRT line to address community concerns regarding on-street parking losses. While removing the 170 surface parking spaces would lessen the change in visual character, implementation of this design option would still result in a significant and unavoidable impact on Westwood Boulevard, as the associated street modification, removal of a limited number of street trees, and introduction of the LRT system would result in a change in the area's character and visual quality as described above for the RPA.

Finding

The Authority makes Finding 1 and Finding 3. Although conformance with *Metro Design Criteria*, which would include public art, landscaping to screen the Expo/Westwood Station from view, and other design features that enhance the visual quality of the community could reduce impacts to the visual character of the area, no feasible mitigation measures have been identified to reduce this impact to less than significant. Therefore, the change to the visual character of the area would remain significant and unavoidable with implementation of the Expo/Westwood Station No Parking Design Option. With regard to each significant effect that is not avoided or that is not substantially lessened, the Authority is adopting a Statement of Overriding Consideration in accordance with CEQA Guidelines Section 15093.

Facts in Support of Findings

The discussion above and the *Metro Design Criteria* provide facts in support of the findings. The construction of a major new transit facility necessarily involves a change in the aesthetic environment in the immediate vicinity of the project. The *Metro Design Criteria* and other measures adopted by the Authority will reduce the aesthetic effects, but it is not feasible to avoid or to substantially lessen the aesthetic effects if the benefits of the Project described in the FEIR and the Statement of Overriding Consideration are to be achieved. Additional facts in support of the findings are described in FEIR Section 3.3 (Aesthetics) and in FEIR Volume II (Comments and Responses).

5.2 Construction Impacts

5.2.1 Air Quality

Construction of the RPA would result in significant and unavoidable impacts to air quality as a result of diesel construction equipment and haul trucks used during construction. The amount of NO_x that would be emitted during the process exceeds the SCAQMD daily construction threshold for that criteria pollutant, even after the implementation of BACMs. In addition, the South Coast Air Basin (SCAB) is in non-attainment for ozone. Since construction of the RPA exceeds the threshold for NO_x, and since NO_x is a precursor to ozone, the project would make a significant and unavoidable contribution to a pollutant for which the SCAB is in non-attainment. Although this impact is considered significant and unavoidable, it is considered a temporary impact since it would only occur during the construction phase of the RPA.

Finding

The Authority makes Finding 1 and Finding 3. Implementation of the RPA would result in a significant and unavoidable impact during construction of the project. The construction of a large infrastructure project necessarily requires the use of heavy equipment that emits pollutants that are precursors of ozone. The construction equipment will comply with applicable air quality control regulations including Best Available Control Measures. The air quality control measures, however, cannot feasibly reduce this impact to less than significant. This is particularly the case for projects in the South Coast Air Basin that does not meet state and federal ozone standards. Therefore, construction-period air emissions would be significant and unavoidable. The Project is a component of the strategy reflected in the RTP and in the AQMP to increase transit use in the Los Angeles area and to reduce reliance on private autos.

Facts in Support of Findings

Additional facts in support of the findings are described in FEIR Chapter 4 (Construction Impacts) and in FEIR Volume II (Comments and Responses). The remaining unavoidable effects are acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

FEIR Design Options

The length and intensity of construction activities associated with implementation of the design options are anticipated to be consistent with those already contemplated as part of the RPA. As such, construction of the design options in conjunction with the other facilities proposed under the project would be expected to exceed SCAQMD thresholds for NO_x during construction, and impacts would remain significant and unavoidable, consistent with the RPA.

Finding

The Authority makes Finding 1 and Finding 3. Implementation of the design options would result in significant and unavoidable impacts during construction of the project. The construction of a large infrastructure project necessarily requires the use of heavy equipment that emits pollutants that are precursors of ozone. The construction equipment will comply with applicable air quality control regulations including Best Available Control Measures. The air quality control measures, however, cannot feasibly reduce this impact to less than significant. This is particularly the case

for projects in the South Coast Air Basin that does not meet state and federal ozone standards. Therefore, construction-period air emissions would be significant and unavoidable. The Project is a component of the strategy reflected in the RTP and in the AQMP to increase transit use in the Los Angeles area and to reduce reliance on private autos.

Facts in Support of Findings

Additional facts in support of the findings are described in FEIR Chapter 4(Construction Impacts) and in FEIR Volume II (Comments and Responses). The remaining unavoidable effects are acceptable when balanced against the facts set forth in the Statement of Overriding Considerations.

6. FINDINGS REGARDING PROJECT ALTERNATIVES

6.1 Introduction

Six alternatives were evaluated in detail in the FEIR prepared for the Expo Phase 2 project: the No-Build Alternative, the TSM Alternative, and four LRT Alternatives. Using the detailed information and analysis contained in the FEIR, this section summarizes the comparison of the alternatives in the FEIR and describes the facts supporting the Authority's adoption of the RPA as the approved project alternative. Each of the alternatives is briefly described below, and information is provided to explain the basis for the selection of LRT Alternative 2 (Expo ROW-Colorado) as the approved project alternative. Detailed descriptions of the alternatives are included in FEIR Chapter 2 (Project Alternatives). Further, since the Project is a regional transportation facility that has been considered in regional transportation and air quality planning efforts, alternatives to the Project considered at the regional level are also relevant to consideration of the feasibility of alternatives, and regional planning efforts are discussed generally in these alternatives findings and in the FEIR.

6.1.1 Overview Regarding the Identification of Alternatives and the Selection of the Approved Project Alternative

CEQA requires that EIRs examine feasible mitigation measures and feasible alternatives to a proposed project. An important element of any EIR is the selection of which alternatives warrant detailed review in the document.

In any environmental review, the lead agency must determine the range of alternatives to be examined. As the California Supreme Court has found, "both the California and the federal courts have... declared that the statutory requirements for consideration of alternatives must be judged against the rule of reason." The Court further noted that "these statutory and judicial concepts are carried forward in the [CEQA] Guidelines":

[An EIR must describe] a reasonable range of alternatives to the project or to the location of the project, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives. (CEQA Guidelines 15126 subd. (d). *Laurel Heights Improvements Assn. v. The Regents of the University of California* (1988) 47 Cal.3d 376, 400.)

It is important to note that the range of alternatives is defined by those alternatives "which could feasibly attain the basic objectives of the project. ..." (emphasis added). Accordingly, in determining the scope of the alternatives analysis and the reasonable range of alternatives, the alternatives analysis in the EIR for the RPA was framed by the project objectives/purposes identified for the Project in the course of its planning history and in relation to the sub-regional and regional planning framework summarized in the EIR and in the Statement of Overriding Considerations attached hereto.

Not only must the range of alternatives reflect those alternatives capable of attaining the basic objectives of the project, but the alternatives must also comprise actions that can feasibly be implemented. The California Supreme Court has noted that "in determining the nature and scope of alternatives to be examined in an EIR, ... local agencies shall be guided by the

doctrine of “feasibility” (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990), 52 Cal.3d 553, 565). As defined in CEQA, the term “feasibility” involves an assessment of whether the mitigation measures and alternatives are “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, social and technological factors.” Accordingly, the alternatives examined in this document (and in prior related environmental reviews as incorporated by reference in the EIR) are those that have been determined to be “feasible” relative to the definition set forth in the environmental statutes and regulations and in relation to the regional and sub-regional transportation planning context.

Transportation projects must be considered within a regional and sub-regional planning context rather than viewing projects in isolation. In particular, a project of the scale of the Project must be viewed in relation to regional and sub-regional planning objectives so that project alternatives can be related to identified public policy goals both for purposes of defining the range of the alternatives to be examined (e.g., alternatives to the project itself) and to the type of alternatives to be reviewed in detail in the environmental document (e.g., alternative means of achieving the project objectives, alternative alignments to avoid or lessen direct environmental impacts).

6.1.2 Regional Transportation Planning Context for Identification of Project Alternatives

Individual transportation projects function within a larger transportation network of existing and planned facilities and programs. SCAG conducts regional transportation planning in the Southern California region (comprised of Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura Counties). SCAG prepares the RTP that provides the framework for ground and aviation transportation planning in the region. Proponents of individual projects (e.g., Counties, Cities, and transportation agencies) coordinate with SCAG through the regional transportation planning process in order to ensure that proposed facilities will complement the existing and planned transportation network in the region. Thus, planning for major transportation projects is subject to an iterative process between local and subregional transportation planning agencies and SCAG. The Statement of Overriding Considerations includes additional details about regional planning documents.

The regional transportation planning agencies rely on a number of strategies to address the region’s transportation needs, including the following:

- Preservation of existing infrastructure; operational strategies to maximize the efficiency of the current system (e.g., through congestion management improvements such as auxiliary lanes and advanced ramp metering)
- Transportation demand management (for example, through the incentives for the use of alternative modes of transportation, such as rideshare and transit)
- Highway and arterial improvements (including high occupancy travel [HOT] lane facilities, inter-county corridors, and planned toll roads such as FTC-S)
- Public transportation facilities and services (including bus and bus rapid transit, Metrolink commuter rail and transit-oriented development)
- Goods movement (including additional investments along high truck demand routes and regional rail capacity improvements)

In addition to ground transportation, SCAG looks at regional aviation issues, including aviation planning to use available capacity at airfields in the region (2004 Regional Transportation Plan, SCAG).

The Authority, Metro, and SCAG evaluated a wide range of alternatives, including several that have not been adopted or continued as alternatives in the regional planning process summarized in this section.

The RPA is identified in the SCAG RTP and is intended to implement a project that has been included in the approved RTP for many years. The RPA is also identified in the SCAG RTP. The range of alternatives identified for evaluation in the FEIR includes a reasonable range of feasible alternatives to meet the project objectives.

6.1.3 No-Build Alternative

The No-Build Alternative includes only Metro service features that currently exist or have been explicitly committed for project buildout in the year 2030. As such, the No-Build Alternative includes existing fixed guideway Metro Rail and Metro Liner bus rapid transit (BRT) systems currently under operation, the full implementation of the Metro Rapid Bus program, represented as twenty-eight routes across Los Angeles County, and planned peak-only rapid bus lanes along Wilshire Boulevard between Western Avenue and Bundy Drive. The rest of the bus network is based on June 2007 service patterns for Metro, LADOT, Culver City, and Santa Monica Big Blue Bus, as well as committed enhancements to those services anticipated by 2030. Based on direction from Metro, their bus fleet would be assumed to include a mix of articulated and higher-capacity 45-foot buses in 2030.

6.1.4 Transportation Systems Management Alternative

The TSM Alternative identifies transit improvements above and beyond the No-Build Alternative with the goal of improving transit services as much as possible without major capital investments in new infrastructure, and specifically without constructing an LRT Alternative. The TSM Alternative would include three basic components: (1) addition of a rapid bus route connecting downtown Culver City with downtown Santa Monica; (2) associated service improvements on selected north/south routes to feed stops along the new rapid bus route; and (3) service improvements on selected routes connecting Westside communities to the Expo Phase 1 LRT terminus.

6.1.5 Light-Rail Transit Alternatives

LRT is defined as a metropolitan electric railway system characterized by its ability to operate single cars or short trains along exclusive rights-of-way at ground level, on aerial structures, in subways, or, occasionally, in streets, and to board and discharge passengers at track or car-floor level. Light-rail vehicles are driven electrically with power drawn from an overhead electric line. LRT provides a cleaner, more energy-efficient form of transportation than automobiles and is quieter than conventional rail systems.

The LRT alignment would extend rail from the current Phase 1 terminus station at Venice/Robertson to a terminus station in Santa Monica at 4th Street and Colorado Avenue. The LRT Alternatives are as follows:

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- LRT Alternative 1 (Expo ROW–Olympic) would utilize approximately 5 miles of the existing Exposition ROW from the Expo Phase 1 terminus until reaching Olympic Boulevard in Santa Monica. From that point, the alternative would follow Olympic Boulevard to the proposed terminus station at Colorado/4th Street.
 - LRT Alternative 2 (Expo ROW–Colorado) would also utilize the existing Exposition ROW from the Expo Phase 1 terminus until reaching Olympic Boulevard in Santa Monica. From that point, the alternative would continue within the Exposition ROW to west of 19th Street, then diverge from the ROW and enter onto Colorado Avenue to the proposed terminus station at Colorado/4th Street.
 - LRT Alternative 3 (Venice/Sepulveda–Olympic) would begin at the Expo Phase 1 terminus and follow Venice Boulevard to Sepulveda Boulevard, where it would turn north and follow Sepulveda until reaching the Exposition ROW. The alternative would then continue westward along the Exposition ROW to Olympic Boulevard in Santa Monica. From that point, the alternative would follow Olympic Boulevard to the proposed terminus station at Colorado/4th Street.
 - LRT Alternative 4 (Venice/Sepulveda–Colorado) would begin at the Expo Phase 1 terminus and follow Venice Boulevard to Sepulveda Boulevard, where it would turn north and follow Sepulveda until reaching the Exposition ROW. The alignment would then continue westward along the Exposition ROW to west of 19th Street, then diverge from the ROW and enter onto Colorado Avenue to the proposed terminus station at Colorado/4th Street.

Geographic Segments

The proposed project traverses several jurisdictions, including the cities of Los Angeles, Culver City, and Santa Monica, and spans distinct communities within each jurisdiction. In order to account for these differences, the proposed project is described and examined at two different scales, from broad to specific—Westside of Los Angeles County and geographic segments with special consideration of proposed station areas—to identify potential impacts.

The LRT Alternatives were divided into geographic segments for ease of analysis in the EIR. For the area between the Phase 1 terminus and the Exposition/Sepulveda intersection, there are two alternative alignments: Segment 1 (Expo ROW) and Segment 1a (Venice/Sepulveda). Segment 2 (Sepulveda to Cloverfield) is common to all LRT Alternatives. For the area between the Cloverfield/Olympic intersection and a terminus in Santa Monica, there are also two alternative alignments: Segment 3 (Olympic) and Segment 3a (Colorado). Thus, the segments are as follows:

- Segment 1 (Expo ROW): Follows the Expo ROW from the Expo Phase 1 terminus station in Culver City to the Expo ROW/Sepulveda Boulevard intersection, approximately 2.8 miles in length
- Segment 1a (Venice/Sepulveda): Follows westerly in the median of Venice Boulevard from the Expo Phase 1 terminus station in Culver City to the Venice Boulevard/Sepulveda Boulevard intersection, then follows northerly in the center of Sepulveda Boulevard to the Expo ROW/Sepulveda Boulevard intersection, approximately 3.7 miles in length

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- Segment 2 (Sepulveda to Cloverfield): Follows the Expo ROW from the Expo ROW/Sepulveda Boulevard intersection to the Expo ROW/Olympic Boulevard intersection, approximately 2.3 miles in length
 - Segment 3 (Olympic): Follows the median of Olympic Boulevard from the Expo ROW/Olympic Boulevard intersection to the Phase 2 terminus option at 4th Street and Colorado Avenue in Santa Monica, approximately 1.5 miles in length
 - Segment 3a (Colorado): Follows the Expo ROW from the Expo ROW/Olympic Boulevard intersection to west of 19th Street in Santa Monica. The alignment then diverges onto Colorado Avenue east of 17th Street and continues along the center of Colorado Avenue terminating between 4th Street and 5th Street, approximately 1.5 miles in length.

Alternatives Considered and Withdrawn

The Authority has considered a range of reasonable alternatives throughout the preparation of the EIR, taking into account ideas offered during scoping, screening, the public comment period and on-going outreach efforts. At the onset of the EIR process in 2007, a broad range of modal and alignment options were initially considered for the Expo Phase 2 project as part of an Alternatives Analysis and Screening Process. This included those alternatives originally described in the Notice of Preparation (NOP), along with alternatives that were brought forward by local governments, the public, or other stakeholders during the Scoping Process. These alternatives were then screened with the objective of narrowing the alternatives to those most likely to meet the project objectives within the purpose and need.

Nine rail and bus alternatives were considered in addition to the No-Build and TSM alternatives. Through a two-level screening process, the LRT Exposition ROW and the LRT Venice/Sepulveda alternatives were recommended for inclusion in the DEIR to provide for a more detailed and comprehensive evaluation that would lead to a more informed decision regarding the Preferred Alternative.

Regarding grade separations at Overland Avenue and/or Westwood Boulevard, the analysis of environmental, safety, technical engineering, and other considerations established that Overland Avenue and Westwood Boulevard would operate safely at-grade, with impacts mitigated to a less-than-significant level per CEQA. As such, a grade separation in these locations would not be needed to mitigate significant impacts, and if anything, would generate other environmental impacts. Construction impacts associated with a grade separation at Overland Avenue and Westwood Boulevard would be more extensive and disruptive to the adjacent community and nearby school. In addition, grade separating Overland Avenue and Westwood Boulevard would substantially increase costs, requiring more local funding. As a result of the community impacts, constructability issues, and cost implications, the Expo Phase 2 project objectives are better accomplished and CEQA significance thresholds are achieved with an at-grade configuration of both Overland Avenue and Westwood Boulevard. Therefore, grade separating Overland Avenue and/or Westwood Boulevard was not recommended for further consideration in the FEIR.

6.2 Environmental Considerations

The FEIR provided a comprehensive evaluation of the environmental impacts of the project alternatives. When compared to the No-Build and TSM Alternatives, the LRT Alternatives provide many beneficial effects including:

- Improved mobility for people on the Westside
- Improved access to jobs, education, and housing for low-income and minority populations
- Improved access to cultural and community facilities
- Long-term air quality and climate change improvements

Several areas of impact function as key differentiators in summarizing the potentially negative impacts of the LRT Alternatives. While impacts may have been identified in other resource areas, they either impact all alternatives equally or do not otherwise serve to differentiate among the alternatives. Further, none of the design options changed the findings of significance relative to impacts and associated mitigation measures for the LRT Alternatives. As such, the design options would not substantially change the comparison of alternatives for the environmental resource areas discussed below.

All LRT Alternatives would utilize Segment 2 (Sepulveda to Cloverfield), which joins the two alternative alignments on both the west and east end of the project as a common center. Since all LRT Alternatives share this segment, impacts occurring within Segment 2 (Sepulveda to Cloverfield) would be identical regardless of the LRT Alternative selected. As such, no further discussion of impacts within Segment 2 (Sepulveda to Cloverfield) would be provided for the purposes of this comparison.

6.2.1 LRT Alternative 1 (Expo ROW–Olympic Alternative, Segments 1, 2, and 3)

Similar to the RPA, LRT Alternative 1 (Expo ROW–Olympic) would utilize Segment 1 (Expo ROW) and Segment 2 (Sepulveda to Cloverfield) and would result in identical impacts compared to the RPA within these segments. This includes the visual quality impacts in the Expo/Westwood Station area associated with the placement of a transit corridor and related amenities in this single-family neighborhood. However, use of Segment 3 (Olympic) would result in potentially significant impacts that would not occur under the RPA, which utilizes Segment 3a (Colorado).

LRT Alternative 1 (Expo ROW–Olympic) would result in the removal of the coral trees and the reconfiguration of Olympic Boulevard, which would result in a loss of an important aesthetic feature. These impacts cannot be mitigated, although efforts would be made through the design process to ameliorate the impacts. These aesthetic impacts associated with LRT Alternative 1 (Expo ROW–Olympic) would be greater than the RPA.

LRT Alternative 1 (Expo ROW–Olympic) has a potential impact on one eligible historic resource. With mitigation, no impact would occur.

LRT Alternative 1 (Expo ROW–Olympic) would result in up to 68 total property acquisitions, 13 full acquisitions, and 55 partial acquisitions, including an estimated 5 individual resident

relocations. All impacts would be mitigated through adherence to the California *Relocation Assistance Act*.

Construction in the median of Olympic Boulevard within Segment 3 (Olympic) would result in some traffic disruption during the construction period.

6.2.2 LRT Alternative 2 (Expo ROW–Colorado Alternative, Segments 1, 2, and 3a)

The RPA, LRT Alternative 2 (Expo ROW–Olympic), would result in visual quality impacts in the Expo/Westwood Station area associated with the placement of a transit corridor and related amenities in this single-family neighborhood. This impact cannot be mitigated, although efforts would be made through the design process to ameliorate the impact.

In addition, the RPA has a potential impact on one eligible resource and one potentially eligible resource. With mitigation, no impact would occur.

The RPA would result in up to 92 property acquisitions, 13 full acquisitions, and 79 partial acquisitions, including an estimated 3 individual resident relocations. All impacts would be mitigated through adherence to the California *Relocation Assistance Act*.

Construction in the middle of Colorado Avenue with Segment 3a (Colorado) will create measurable traffic disruption during the period of construction.

6.2.3 LRT Alternative 3 (Venice/Sepulveda–Olympic Alternative, Segments 1a, 2, and 3)

LRT Alternative 3 (Venice/Sepulveda–Olympic) would result in several potentially significant impacts that would not occur under the RPA. Operation of this alternative would result in two traffic impacts that cannot be mitigated at the intersections of Sepulveda Boulevard/Palms Boulevard and Girard Avenue/Midvale Avenue/Venice Boulevard.

Visual quality impacts would be experienced along Venice and Sepulveda Boulevards associated with property acquisitions, the reconfigured streetscape, the removal of the existing landscaping, the loss of existing street trees, and the visual dominance of the aerial portions of LRT Alternative 3 (Venice/Sepulveda–Olympic) within Segment 1a (Venice/Sepulveda). Also, removal of the coral trees and the reconfiguration of Olympic Boulevard would result in a loss of an important aesthetic feature within Segment 3 (Olympic). These impacts cannot be mitigated, although efforts would be made through the design process to ameliorate the impacts. These aesthetic impacts associated with LRT Alternative 3 (Venice/Sepulveda–Olympic) would be greater than those identified under the RPA.

Although, no impact would occur with mitigation, LRT Alternative 3 (Venice/Sepulveda–Olympic) has the potential to impact one registered historic resource, one eligible, and four potentially eligible historic resources. Compared to the RPA, implementation of LRT Alternative 3 (Venice/Sepulveda–Olympic) would result in greater impacts related to cultural resources.

Additionally, LRT Alternative 3 (Venice/Sepulveda–Olympic) would result in up to 188 property acquisitions, 48 full acquisitions, and 140 partial acquisitions, including an estimated 261 individual resident relocations, which is more than double what would occur under the RPA. Although impacts would be mitigated through adherence to the California *Relocation Assistance*

Act, impacts would be significantly reduced by selection of the RPA, which would require less property acquisitions and resident displacement.

Construction in the median of the highly traveled Venice and Sepulveda Boulevards would create substantive traffic disruption for much of the project construction period. Construction in the middle of Olympic Boulevard would create measurable traffic disruption during the period of construction as well. As such, construction impacts compared to the RPA would be greater.

Traffic, aesthetic, cultural, socioeconomic and construction impacts under LRT Alternative 3 (Venice/Sepulveda–Olympic) would be greater than those of the RPA.

6.2.4 LRT Alternative 4 (Venice/Sepulveda–Colorado Alternative, Segments 1a, 2, and 3a)

Unlike the RPA, LRT Alternative 4 (Venice/Sepulveda–Colorado) would utilize Segment 1a (Venice/Sepulveda) in the east portion of the alignment. Implementation of LRT Alternative 4 (Venice/Sepulveda–Colorado) would result in two intersection impacts that cannot be mitigated at the intersections of Sepulveda Boulevard/Palms Boulevard and Girard Avenue/Midvale Avenue/Venice Boulevard.

Visual quality impacts would be experienced along Venice and Sepulveda Boulevards associated with property acquisitions, the reconfigured streetscape, the removal of the existing landscaping, the loss of existing street trees, and the visual dominance of the aerial portions of LRT Alternative 4 (Venice/Sepulveda–Colorado). These impacts cannot be mitigated, although efforts would be made through the design process to ameliorate the impacts. These aesthetic impacts associated with LRT Alternative 4 (Venice/Sepulveda–Colorado) would be greater than the RPA.

Although, no impact would occur with mitigation, LRT Alternative 4 (Venice/Sepulveda–Colorado) has the potential to impact one registered historic resource, one eligible, and five potentially eligible historic resources. Compared to the RPA, implementation of LRT Alternative 4 (Venice/Sepulveda–Colorado) would result in greater impacts related to cultural resources.

LRT Alternative 4 (Venice/Sepulveda–Colorado) would result in up to 212 property acquisitions, 48 full acquisitions, and 164 partial acquisitions, including an estimated 259 individual resident relocations, which is substantially greater than the number of acquisitions required under the RPA. Although all impacts would be mitigated through adherence to the California *Relocation Assistance Act*, impacts related to property acquisition and residential relocation and related disruption would be significant greater under LRT Alternative 4 (Venice/Sepulveda–Colorado), compared to the RPA.

Construction in the median of the highly traveled Venice and Sepulveda Boulevards would create substantive traffic disruption for much of the project construction period. Construction in the middle of Colorado Avenue would create measurable traffic disruption during the period of construction as well. As such, construction impacts compared to the RPA would be greater.

Traffic, aesthetic, cultural, socioeconomic and construction impacts under LRT Alternative 4 (Venice/Sepulveda–Colorado) would be greater than those of the RPA.

6.2.5 Summary of Environmental Considerations

LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 2 (Expo ROW–Colorado) would have fewer traffic impacts; lower property acquisition, residential relocation, and related disruption; less disturbance to culturally sensitive resources; and less traffic disruption during construction. LRT Alternative 1 (Expo ROW–Olympic) would result in long-term impacts on the Expo/Westwood Station area community and the coral trees on Olympic Boulevard. Selection of LRT Alternative 2 (Expo ROW–Colorado) versus LRT Alternative 1 (Expo ROW–Olympic) would mitigate the impacts on the coral trees, although traffic disruption on Colorado Avenue would be greater during construction than on Olympic Boulevard.

6.3 Performance Efficiency and Cost Effectiveness

Although performance efficiency and cost effectiveness measures are not required by the CEQA process, the Authority has elected to include this information to further explain differences among the various alternatives and to explain the factors considered by the Authority in its review of the benefits and effects of the project alternatives. Key performance measures include ridership, user benefits (hours of travel time saved), capital costs, operating costs, and cost effectiveness.

6.3.1 Performance Efficiency

Overall, the four LRT Alternatives perform better than the TSM Alternative, with over three times the weekday boardings. The LRT Alternatives would serve a broader range of trips for transit dependents, with higher transit dependent user benefits.

The LRT Alternatives are all closely comparable to one another for most performance measures, although LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 2 (Expo ROW–Colorado) perform slightly better than the others in most evaluation categories. The slight ridership benefit of LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 2 (Expo ROW–Colorado) over LRT Alternative 3 (Venice/Sepulveda–Olympic) and LRT Alternative 4 (Venice/Sepulveda–Colorado) is generally attributed to the faster travel on the almost 1-mile-shorter Expo ROW alignment.

6.3.2 Cost Effectiveness

Cost effectiveness begins to differentiate the LRT Alternatives in a measurable way. As presented in FEIR Chapter 6 (Financial Considerations), the capital and operating costs of LRT Alternative 3 (Venice/Sepulveda–Olympic) and LRT Alternative 4 (Venice/Sepulveda–Colorado) are more expensive to build and operate than LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 2 (Expo ROW–Colorado). Conversely, the boardings and user benefits of LRT Alternative 3 (Venice/Sepulveda–Olympic) and LRT Alternative 4 (Venice/Sepulveda–Colorado) are slightly lower than LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 2 (Expo ROW–Colorado), primarily related to increased travel time resulting from the longer distance traveled on LRT Alternative 3 (Venice/Sepulveda–Olympic) and LRT Alternative 4 (Venice/Sepulveda–Colorado). As a result, LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 2 (Expo ROW–Colorado) carry a cost effectiveness of \$25.12 and \$24.34, respectively, whereas LRT Alternative 3 (Venice/Sepulveda–Olympic) and LRT Alternative 4 (Venice/Sepulveda–Colorado) carry a cost effectiveness of \$37.75 and \$36.64, respectively.

6.3.3 Summary of Performance Efficiency and Cost Effectiveness

The performance of a project must be considered in context with the project costs. The TSM Alternative is the least costly at \$44 million, and the most cost effective at \$13.70. However, with only 10,296 boardings in 2030, the TSM Alternative does not address the project objectives as effectively as the LRT Alternatives.

LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 2 (Expo ROW–Colorado) provide the best ridership return on investment for all users, but LRT Alternative 2 (Expo ROW–Colorado) would provide the most cost-effective service, related to the lower capital construction and operating costs. While LRT Alternative 1 (Expo ROW–Olympic) is somewhat more costly, it does contribute slightly higher user benefits than LRT Alternative 2 (Expo ROW–Colorado).

6.4 Summary of Findings for Recommended Preferred Alternative

The No-Build and TSM Alternatives do not meet the purpose and need for the Expo Phase 2 project. LRT Alternative 1 (Expo ROW–Olympic) and LRT Alternative 2 (Expo ROW–Colorado) have an advantage over LRT Alternative 3 (Venice/Sepulveda–Olympic) and LRT Alternative 4 (Venice/Sepulveda–Colorado) in terms of basic environmental compatibility and performance. In addition, LRT Alternative 2 (Expo ROW–Colorado) performs significantly better from a cost-effectiveness perspective.

In summary, given the relative impacts associated with the various alternatives, LRT Alternative 1 (Expo ROW–Olympic) or LRT Alternative 2 (Expo ROW–Colorado) are considered to be environmentally superior among the LRT Alternatives. However, when cost and efficiency are added to the environmental characteristics, LRT Alternative 2 (Expo ROW–Colorado) emerges as the best performing alternative. It would provide high ridership, a competitive travel time, less community disruption, and the least relocation of residents, with the most cost effective price. Many of the public comments received were in favor of using the Expo ROW alignment, as opposed to Venice/Sepulveda alignment. The Colorado alignment also received strong support from the Santa Monica City Council, as well as major stakeholders, residents, and the community. As such, LRT Alternative 2 (Expo ROW—Colorado) is the RPA.

In response to community concerns, the Authority worked with the City of Santa Monica, Metro, and the community to identify alternative sites and layouts for the Maintenance Facility. Approximately twenty sites, ranging in size from 3 to 18 acres, were identified as potential candidate sites within the bounds of the study area based upon the desirable site characteristics. Several sites were screened initially as being either too small to meet the facility site size requirement (6 to 10 acres) or too irregularly shaped to accommodate the facility's program requirements. The remaining alternative sites were screened and eliminated from further consideration for the reasons indicated in Table 6-1 (Maintenance Facility Site Survey). Based on this screening, site E210 (the Verizon property) was considered to be the most suitable site for inclusion and analysis in the DEIR.

Subsequent to the DEIR, several alternatives to the proposed Verizon site (E210) were explored, including a “split” alternative using the Verizon site, the adjacent Santa Monica College parking lot, and an adjacent site at 1800 Stewart Street (eastern portion of Site E208 on the west side of Stewart Street); a “hybrid” alternative utilizing the Verizon site, the Santa Monica College parking lot, and a portion of the City of Santa Monica yards site (E209) on the west side of Stewart Street for a joint parking structure; and alternatives limited to the Verizon

site and the existing Santa Monica College parking lot on the east side of Stewart Street. These collaborative efforts resulted in a Maintenance Facility Buffer Design Option that was evaluated in the FEIR and incorporated into the RPA.

Table 6-1 Maintenance Facility Site Survey

Site Description				Physical Attributes and Environmental Considerations	Recommendation
Site No.	Bounded By	Existing Uses of Site	Size (acres)		
E201	9 th Street, Colorado Avenue, 11 th Street, Olympic Boulevard	Mostly commercial and industrial uses	13.0	<ul style="list-style-type: none"> • Adjacent to Olympic Boulevard and Colorado Avenue alignments • Ideal size • Would displace multiple businesses • Connection to LRT on Olympic Boulevard or Colorado Avenue would create challenges 	Not Recommended
E202	11 th Street, Colorado Avenue, 14 th Street, Olympic Boulevard	Commercial and industrial uses	20.0	<ul style="list-style-type: none"> • Adjacent to Olympic Boulevard and Colorado Avenue alignments • Ideal size • Would displace multiple businesses • May require partial acquisition of Memorial Park 	Not Recommended
E203	Olympic Boulevard, 14 th Street, 17 th Street, I-10	Commercial/ industrial uses and I-10 shoulder	5.8	<ul style="list-style-type: none"> • Adjacent to Olympic Boulevard alignment • Inadequate size • Would displace multiple businesses • Decking I-10 shoulder could create impacts • Adjacent to Olympic/17th Street Station and Memorial Park 	Not Recommended
E204	Olympic Boulevard, 17 th Street, 20 th Street, I-10 Westbound shoulder	Commercial/ industrial uses and I-10 shoulder	4.1	<ul style="list-style-type: none"> • Adjacent to Olympic Boulevard alignment • Inadequate size • Would displace multiple businesses • Decking I-10 shoulder could create impacts • Adjacent to Olympic/17th Street Station • Access challenges due to Cloverfield Boulevard aerial LRT 	Not Recommended

Table 6-1 Maintenance Facility Site Survey

Site Description				Physical Attributes and Environmental Considerations	Recommendation
Site No.	Bounded By	Existing Uses of Site	Size (acres)		
E205	Olympic Boulevard, 17 th Street, 20 th Street, I-10 Eastbound shoulder	Commercial/ industrial uses and over I-10 freeway	10.0	<ul style="list-style-type: none"> • Adjacent to Olympic alignment; moderate size • Would displace multiple businesses • Decking I-10 shoulder could create impacts • Adjacent to Olympic/17th Street Station • Access challenges due to Cloverfield Boulevard aerial LRT 	Not Recommended
E206	Cloverfield Boulevard, Michigan Avenue, 21 st Street, Olympic Boulevard	Commercial and industrial uses	13.5	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Ideal size • Irregular shape with existing power substation in center that would require relocation • Would displace multiple businesses • Access challenges due to Cloverfield Boulevard aerial LRT • Adjacent to Crossroads School and multi-family residences 	Not Recommended
E207	26 th Street, Cloverfield Boulevard, Olympic Boulevard	Commercial and industrial uses	3.4	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Inadequate size • Irregular shape 	Not Recommended
E208	Stewart Street, Exposition ROW, 26 th Street	Bergamot Station and adjacent city property	9.8	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Moderate size • Would displace artist community at Bergamot Station and long-term lease of adjacent city property • Adjacent to Olympic/26th Street Station, which may be better suited to transit-oriented development (TOD) 	Not Recommended

Table 6-1 Maintenance Facility Site Survey

Site Description				Physical Attributes and Environmental Considerations	Recommendation
Site No.	Bounded By	Existing Uses of Site	Size (acres)		
E209	Stewart Street, Michigan Avenue, 24 th Street, Delaware Avenue	Santa Monica City Yard and Recycle Plant	14.0	<ul style="list-style-type: none"> • Ideal size • Existing light industrial • Difficult access due to distance from Exposition ROW (400 to 500 feet) • Access blocked by buildings • Significant hazardous materials impacts and clean-up cost due to landfill uses • Adjacent to Stewart Park 	Not Recommended
E210	Exposition Boulevard, Exposition ROW (east of Stewart Street)	Verizon property	6.8	<ul style="list-style-type: none"> • Adjacent to Expo ROW • Moderate size • Mostly parking • Adjacent to single-family residences 	Recommended for DEIR
E211	Nebraska Avenue, Centinela Avenue (north of Olympic Boulevard)	Power Substation	7.5	<ul style="list-style-type: none"> • Moderate size • Existing industrial • Difficult access to site due to distance from Exposition ROW • Adjacent to single-family residences • Relocating power substation would be costly and could have secondary land use and aesthetic impacts 	Not Recommended
E212	Exposition Boulevard, Exposition ROW (west of Centinela Avenue)	Commercial property	2.5	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Inadequate size • Insufficient frontage along Exposition ROW to access yard site • New building • Adjacent to single-family residences 	Not Recommended

Table 6-1 Maintenance Facility Site Survey

Site Description				Physical Attributes and Environmental Considerations	Recommendation
Site No.	Bounded By	Existing Uses of Site	Size (acres)		
E213	Exposition Boulevard, Centinela Avenue	Commercial and industrial uses	6.0	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Irregular shape • Would displace multiple businesses • Adjacent to single-family residences 	Not Recommended
E214	Exposition ROW, Barrington Avenue, Olympic Boulevard, Colby Avenue	Commercial and industrial uses	14.0	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Ideal size • Would displace multiple businesses • Access challenges due to Pico Boulevard/Gateway Boulevard LRT aerial tracks • Near school and childhood center 	Not Recommended
E215	Exposition ROW, Purdue Avenue, Tennessee Avenue, Federal Avenue	Residential, commercial and industrial uses	7.2	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Moderate size • Would displace multiple businesses and residences • Site of new residential construction • Access challenges due to Pico Boulevard/Gateway Boulevard aerial LRT 	Not Recommended
E216	Sawtelle Boulevard, Pico Boulevard, Exposition ROW	Under the I-405 Freeway	1.5	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Inadequate size due to freeway embankment to the north • Constrained by freeway columns and ramps • Access constrained by Sawtelle Boulevard aerial LRT 	Not Recommended

Table 6-1 Maintenance Facility Site Survey

Site Description				Physical Attributes and Environmental Considerations	Recommendation
Site No.	Bounded By	Existing Uses of Site	Size (acres)		
E217	Exposition ROW, Sepulveda Boulevard, Pico Boulevard	Concrete Batch Plant (Casden development site)	3.0	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Inadequate size • Irregular shape • Under private development • Adjacent to Expo/Sepulveda Station, which may be better suited to TOD • Access constrained by Sawtelle Boulevard aerial LRT 	Not Recommended
E218	Sepulveda Boulevard, Exposition ROW, Military Avenue	Commercial/ industrial use	6.5	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Access to site constrained by Sepulveda Boulevard and Military Avenue • Irregular shape • Adjacent to single-family residences 	Not Recommended
E219	Exposition ROW, National Boulevard	Public Storage and Lycée Françias School	3.5	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Inadequate size • Site at lower grade than LRT tracks • Site of new school construction • Adjacent to residences and school 	Not Recommended
E220	Venice Boulevard, Durango Avenue	Shopping Center with multiple tenants (Office Depot, Sav-on Drugs, etc.)	6.5	<ul style="list-style-type: none"> • Adjacent to Exposition ROW • Irregular shape • Would displace multiple businesses • Access constrained by Venice Boulevard aerial LRT • Adjacent to residences and Media Park 	Not Recommended

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Exposition Metro Line Construction Authority

Exposition Corridor Transit Project Phase 2

Final Environmental Impact Report

Statement of Overriding Considerations

February 2010

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INTRODUCTION

The *California Environmental Quality Act* (CEQA) requires the Exposition Metro Line Construction Authority (Expo Authority) as the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of the Exposition Corridor Transit Project Phase 2 (Expo Phase 2) against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of the proposed Expo Phase 2 project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (CEQA Guidelines 15093(a)). CEQA requires the Expo Authority to support, in writing, the specific reasons for considering the Expo Phase 2 project acceptable when significant effects are not avoided or substantially lessened, based on substantial evidence in the Final Environmental Impact Report (FEIR) or Administrative Record (CEQA Guidelines 15093(b)).

The Expo Authority finds that the Mitigation Measures identified in the FEIR and the Mitigation Monitoring and Reporting Program, when implemented, avoid or substantially lessen virtually all of the significant effects identified in the FEIR for the Recommended Preferred Alternative (RPA). However, certain significant impacts remain unavoidable, even after the incorporation of all feasible Mitigation Measures.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The Expo Authority Board of Directors hereby finds that, for the reasons set forth below, the economic, social, and other consideration of the Expo Phase 2 project outweigh the significant and unavoidable air quality and aesthetic impacts resulting from RPA, as identified in the Findings of Fact. These significant and unavoidable impacts are summarized below:

Aesthetics

Impacts related to implementation of the Expo/Westwood Station in RPA Segment 1 (Expo ROW) would represent a substantial change in the surrounding area's character and visual quality, which is a significant impact. Although the Expo ROW served as a rail corridor up until the mid-1980s, the surrounding community in Segment 1 (Expo ROW) has grown accustomed to the existing visual character, identified as moderate high in the FEIR. As part of the RPA, Westwood Boulevard would be widened by approximately 4 feet between Ashby Avenue and Richland Avenue, which would result in a limited number of the liquidambar trees along Westwood Boulevard being removed and replaced with younger trees. Conformance to the *Metro Design Criteria* would ensure that street trees and landscaped areas shall be preserved wherever practicable. Also, trees that require removal would be replaced on a one-for-one basis, subject to local jurisdictional requirements for minimum size, species, and set-back requirements. The City of Los Angeles does not designate the liquidambar tree as a protected tree (City of Los Angeles, Ordinance 177404). As such, there is no requirement to save and/or replace these trees in kind.

Introduction of a 170-space parking lot and station within this area, along with modifying existing bus stops on either side of Westwood Boulevard, would change the character of the area. The

proposed street modifications, the surface station parking, as well as the minimal increased bus service and stops along Westwood Boulevard would alter the character of the station vicinity from that of a residential neighborhood with a vacant right-of-way that serves as an informal community open space to that of a transit corridor. The proposed Expo/Westwood Station would be designed according to the *Metro Design Criteria*, which would include public art, landscaping to screen the Expo/Westwood Station from view, and other design features that enhance the visual quality of the community.

No feasible mitigation measures other than conformance to the *Metro Design Criteria* have been identified to reduce the aesthetic impact. Therefore, the change in character of this area due to the introduction of the station, street widening, surface parking, and a minimal increase in transit will remain. Consequently, Segment 1 (Expo ROW) of the RPA was determined to have a significant and unavoidable impact to aesthetics.

Construction Air Quality

The RPA would result in significant and unavoidable impacts to air quality during the construction period as a result of diesel construction equipment and haul trucks needed to build the light rail extension. The amount of nitrogen oxides (NO_x) that will be emitted during the process exceeds the South Coast Air Quality Management District (SCAQMD) daily construction threshold for that criteria pollutant, even after the implementation of Best Available Control Measures (BACM). In addition, the South Coast Air Basin (SCAB) is in non-attainment for ozone, meaning that the region does not satisfy the ambient air quality standard for this pollutant. Since construction of the RPA exceeds the threshold for NO_x, and NO_x is a precursor to ozone, the project would make a significant and unavoidable contribution to a pollutant for which the SCAB is in non-attainment. Although these emissions are considered a temporary impact since they would only occur during the construction phase of the RPA, this impact is considered significant and unavoidable because of the non-attainment status of the SCAB.

COMPELLING OVERRIDING CONSIDERATIONS

The Expo Authority Board of Directors specifically finds that notwithstanding the disclosure of the significant and unavoidable impacts discussed above, there are specific overriding economic, legal, social, technological, and other reasons for approving this project and finding the above adverse effects to be considered acceptable. These reasons are described below.

Improved Mobility and Traffic Reduction

The Project is an important component of the regional transportation plan and the transportation improvement program approved by the Southern California Association of Governments, metropolitan planning organization for Southern California. The Project contributes to the strategy in the transportation plan to establish transit alternatives to the private automobile and to improve regional mobility. The RPA would have a beneficial effect on Los Angeles County and the Expo Phase 2 study area traffic by reducing Vehicle Miles Traveled (VMT) and Vehicle Hours Traveled (VHT). For example, the RPA would result in the reduction of approximately 43,893 daily VMT in Los Angeles County in 2030 as compared to the No-Build Alternative, falling from a daily VMT of approximately 223,164,138 for the No-Build Alternative to a daily

VMT of approximately 223,120,245 under the RPA. Additionally, VHT would drop from a No-Build Alternative of approximately 9,363,595 daily VHT to approximately 9,354,590 daily VHT, a reduction of 9,005 daily VHT. Both VMT and VHT would be reduced by the RPA in the study area as well.

Furthermore, the RPA would increase regional daily transit trips from 1,528,323 under the No-Build Alternative to 1,542,709 under the RPA, an increase of approximately 14,386 trips. Transit mode share for the region would also increase from approximately 1.963 percent under the No-Build Alternative to 1.981 percent under the RPA. This would be an increase of approximately 0.018 percent and a difference of approximately 0.94 percent in the regional transit mode share.

The reduction in these important indicators of mobility and traffic is attributable to the diversion of motorists on the local and regional roadways to transit.

Access to Major Activity Centers and Destinations

The Expo Phase 2 project, in conjunction with the Expo Phase I project, would vastly improve mobility by serving various educational, employment, cultural, commercial, and destination locations throughout the study area. These destinations include, but are not limited to: downtown Los Angeles, Los Angeles Convention Center, LA Live District, Staples Center, University of Southern California (USC), Los Angeles Trade Technical College, Paramount and Sony Studios, California African-American Museum, California Science Center, Los Angeles County Museum of Natural History, Los Angeles Memorial Coliseum, Bergamot Station, Santa Monica College, downtown Santa Monica, the future Santa Monica Place shopping center, and the beach. Regionally, the completion of Expo Phase 1 and Expo Phase 2 projects would provide a direct connection to the 7th Street Metro Center, which will provide access to the Metro Blue Line, Red Line, Purple Line, and Union Station.

Alternative Travel Choices

The RPA offers commuters an alternative to the congested I-10 freeway and adjacent parallel streets. For example, the RPA would improve transportation mobility and connectivity for residents and commuters in the project study area; provide faster, more reliable public transportation services; increase the capacity of the transportation system; and provide more travel choices. Additionally, the I-10 freeway that serves the Expo Phase 2 corridor is currently over capacity in many segments. This congestion is anticipated to increase 7 to 9 percent by 2030.¹ As a result of this congestion, east/west arterials are being used as alternate routes with resultant congestion, particularly during peak periods. Expansion of freeways and arterials is limited by the significant amount of existing development surrounding them and would require significant property acquisition and costs. As such, rail transit improvements would offer a way to expand the capacity of the transportation network, providing additional transportation options within the study area and connecting the study area to the larger community, including downtown Los Angeles, Culver City and Santa Monica. Expansion of transit opportunities as a result of the RPA is also broadened for bicyclists, bus riders, and pedestrians.

Furthermore, the RPA would provide a safe means of transportation between the Westside and downtown Los Angeles by integrating the existing regional transit network and expanding the

¹ Iteris, *Transportation/Traffic Technical Background Report*.

region's transportation system capacity. Based on the proposed headways and frequency of the RPA, reliable transportation opportunities would be provided for a vast, transit-dependent population who have modest incomes or do not drive. The RPA would also increase the transportation choices for patrons available for both work and non-work related trips.

Extending Mobility Benefits of the Expo Phase 1 Project

The RPA would provide light rail transit service to the Westside and Santa Monica from downtown Los Angeles. The RPA would also complete the ultimate connection for the Exposition Corridor Transit Project Phase I, which is currently under construction. Completing Phase 2 will increase the utilization of Phase I and will ensure that the full benefits of Exposition Corridor Transit Project Phase I are realized.

Utilization of Existing ROW

The RPA would utilize approximately 5 miles of existing Exposition ROW from the Expo Phase I terminus until reaching 17th Street in the City of Santa Monica. This would allow for the Expo Authority to capitalize upon and maximize the use of existing assets to effectively and efficiently provide transit to the study area. Acquisition of new and/or additional right-of-way would be costly due to the financial investment needed for property acquisition, as well as the disruption to existing uses.

Cost Effectiveness

Although the Expo Authority is not seeking federal funding for the Expo Phase 2 project, the FTA's Section 5309 New Starts Criteria are a useful means by which to measure the RPA's cost effectiveness. The RPA has a cost effectiveness index of \$24.34 per annual hour of user benefit. By comparison, Alternatives LRT 1, LRT 3 and LRT 4 have a cost effectiveness index of \$25.12, \$37.75, and \$36.64, respectively. Therefore, the RPA is considered more cost effective.

Economic Growth and Development Potential

Construction of the RPA will create new construction jobs. The Expo Authority has adopted a small business enterprise policy which encourages small business participation in the project.

Employment in the Los Angeles County between the years 2000 and 2030 is expected to increase from approximately 4,761,400 jobs to approximately 5,775,000 jobs. Similarly, in the study area, employment is anticipated to increase from approximately 222,633 jobs to approximately 275,405 jobs in the same period. Furthermore, employment in both the Culver City and Santa Monica areas are anticipated to almost double. In addition to providing a cost effective, jobs-producing project, the RPA could result in community investment and the development of Transit Oriented Development (TOD) around station areas. Similar developments have occurred around stations on the Metro Gold and Red Lines.

Improved Operational Air Quality

The FEIR found that, due to the overall reduction in VMT in the study area, as well as in the larger Los Angeles County area, the RPA would have a beneficial effect on air quality locally and in the region. As shown in Table 1 (Annual Reductions in Criteria Pollutant Emissions in Los Angeles County), the measure of all criteria pollutants would be reduced with implementation of the RPA due to the reduction in annual VMT. Additionally, the electrically operated light-rail vehicles under the RPA would not produce CO, VOC, NO_x, SO_x, PM₁₀, or PM_{2.5} emissions and, therefore, would not add to emission levels.

Table 1 Annual Reductions in Criteria Pollutant Emissions in Los Angeles County

Measure	No-Build Alternative (baseline)	Recommended Preferred Alternative	Change from No-Build (tons per year)
VOC	11,447.88	11,445.63	2.25
NO _x	13,127.14	13,124.56	2.58
CO	131,703.25	131,677.34	25.91
SO _x	401.01	400.93	0.08
PM ₁₀	70,218.60	70,204.78	13.82

SOURCE: Data from URBEMIS2007; based on VMT in the *Transportation/Traffic Technical Background Report*.

*Countywide Emissions measured in tons per year; Annual total.

The RPA would result in a lessening of regional emissions, thereby supporting efforts to attain the National Ambient Air Quality Standards (NAAQS) and AQMD thresholds. In addition, the RPA would not conflict with and would serve to help achieve the pollution reduction measures identified in both the regional Air Quality Management Plan and the California State Implementation Plan.

Global Climate Change

Development of the RPA was determined to have a beneficial impact on global climate change since the greenhouse gas emissions predicted for operation of the project would not exceed any threshold of significance. For example, while the RPA would result in approximately 345 metric tons per year of CO₂ over the No-Build Alternative, California Air Pollution Control Officers Association (CAPCOA) considers an incremental increase below 10,000 metric tons of CO₂ per year to be less than significant. The increase anticipated under the RPA would result in an increase in CO₂ of approximately 3.5 percent of the allowable incremental increase. This increase is compared to approximately 57.8 percent and 71.6 percent for other alternatives considered. Implementation of the RPA would reduce daily VMT, a significant contributor to global climate change, which contributes substantially to the low increase in CO₂ generation. The State of California has adopted legislation and other policies that require that utilities increase the generation of electric power from renewable sources. It is anticipated the percentage of power used by the Project and derived from renewable sources will increase as the legislation and policies are implemented.



Exposition Metro Line Construction Authority

Exposition Corridor Transit Project Phase 2

Final Environmental Impact Report

FINAL

Mitigation Monitoring and Reporting Program

February 2010



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Table 1: Mitigation Monitoring and Reporting Program for Expo Phase 2 Project 2

INTRODUCTION

This Mitigation Monitoring and Reporting Program has been prepared for the Exposition Corridor Transit Project Phase 2 (Expo Phase 2), as required by Section 21081.6 of the California *Public Resources Code* (PRC) and Section 15097 of the *California Environmental Quality Act* (CEQA) Guidelines. Pursuant to these requirements, public agencies approving a project with an Environmental Impact Report (EIR) must adopt a Mitigation Monitoring and Reporting Program for that project. As such, the Exposition Metro Line Construction Authority (Expo Authority) as Lead Agency of the Expo Phase 2 project is required to adopt a Mitigation Monitoring and Reporting Program to ensure that all of the adopted mitigation measures are implemented within a specific timeframe and by the appropriate responsible party.

In the Findings of Fact concerning the environmental effects of the Expo Phase 2 project, the Expo Authority must also include a finding that a Mitigation Monitoring and Reporting Program has been prepared and provides a satisfactory program that will ensure avoidance or sufficient reduction of the significant effects of the project.

CONTENT

The Mitigation Monitoring and Reporting Program found in Table 1 (Mitigation Monitoring and Reporting Program for Expo Phase 2 Project) contains a brief statement of all Mitigation Measures; identifies the monitoring action; indicates the party responsible for implementing the mitigation; and identifies the enforcement agency, monitoring agency and the monitoring phase or timing. The Los Angeles County Metropolitan Transportation Authority (Metro) shall be responsible for assuring full compliance with the provisions of this program during operation of the Expo Phase 2 project, while the Expo Authority shall be responsible during design and construction. The Chief Executive Officer (CEO) of Expo may delegate duties and responsibilities to staff, applicants, and consultants, as necessary. The CEO shall also ensure that monitoring reports are filed on a timely basis and, when identified, that plan violations are corrected.

Progress toward completion of the required Mitigation Monitoring and Reporting Program, or violations thereof, shall be reported at prescribed intervals to the CEO. The reports shall be prepared using approved forms or an acceptable format. These reports will be available for public review at any time upon request.

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
Operational Impacts				
Transportation/ Traffic	<p>MM TR-4 In the quarter mile area surrounding each station where spillover parking is anticipated, a program shall be established to monitor the on-street parking activity in the area prior to the opening of service and shall monitor the availability of parking monthly for six months following the opening of service. If a parking shortage is determined to have occurred (i.e., existing parking space utilization increases to 100 percent) due to the parking activity of the light-rail transit (LRT) patrons, Metro shall work with the appropriate local jurisdiction and affected communities to assess the need for and specific elements of a permit parking program for the impacted neighborhoods. The guidelines established by each local jurisdiction for the assessment of permit parking programs and the development of community consensus on the details of the permit program shall be followed. Metro shall reimburse the local jurisdictions for the costs associated with developing the local permit parking programs within one-quarter mile of the stations and for the costs of the signs posted in the neighborhoods. Metro will not be responsible for the costs of permits for residents desiring to park on the streets in the permit districts. For those locations where station spillover parking cannot be addressed through implementation of a permit program, alternative mitigation options include time-restricted, metered, or shared parking arrangements. Metro will work with the local jurisdictions to determine which option(s) to implement.</p>	<p>Establish monitoring program prior to opening of service</p> <p>Report conditions monthly for first six months of operation</p> <p>Verify local adoption of specific parking program, if a program is to be implemented</p>	<p>Metro/Expo Authority</p> <p>LADOT/City of Santa Monica Planning and Community Development Department</p>	<ul style="list-style-type: none"> • LADOT/City of Santa Monica Planning and Community Development Department • Metro • Prior to operation and first six months of operation

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>MM TR-9 Colorado Avenue. Replacement parking would be required along the impacted portions of Colorado Avenue. The potential replacement parking lots are listed below. Additional replacement options could include implementation of diagonal parking on adjacent streets (after extensive neighborhood outreach), or the implementation of design options, which would reduce the extent of parking impacts.</p> <p>MM TR-9(a) South side of Colorado Avenue, between 14th Street and 11th Street. Property would have to be acquired to provide replacement parking. Potential parcels on the south side of Colorado Avenue between 18th Street and 16th Street have been identified.</p> <p>MM TR-9(b) South side of Colorado Avenue, between 11th Street and 4th Street. Property would have to be acquired to provide replacement parking. A potential parcel at the northwest corner of 6th Street and Colorado Avenue has been identified.</p>	<p>Verify and review inclusion in final plans</p>	<p>Expo Authority</p>	<ul style="list-style-type: none"> • SMPCDD • Expo Authority • Final Design and Construction
<p>Cultural Resources</p>	<p>MM CUL-1 Per CEQA Guidelines Section 21803.2(i), “a lead agency may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place.”</p> <p>This project involves ground-disturbing activities throughout the area defined as the archaeological area of potential effect</p>	<p>Verify completion of Cultural Resources Treatment Plan and Archaeological Resources Monitoring Report</p> <p>Verify retention and presence of a qualified archeological monitor during ground-disturbing activities</p>	<p>Expo Authority/ Design Build Contractor</p>	<ul style="list-style-type: none"> • Expo Authority • Metro • Construction

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>(APE). Prior to the commencement of construction activities, a Cultural Resources Treatment Plan, including a Discovery Plan, shall be prepared describing a site-specific archaeological monitoring program for high potential areas and treatment methods that will be implemented in the event archaeological resources are discovered during construction.</p> <p>Because buried or otherwise obscured archaeological resources may be encountered, an archaeological monitoring program shall be implemented in accordance with the project's Treatment Plan. Archaeological monitoring of ground-disturbing activities shall be limited to those portions of the Expo ROW that are presently obscured by pavement and/or buildings, unless it can be ascertained that previous ground disturbance has eliminated the potential to yield archaeological resources. Monitoring shall be conducted by a qualified archaeological monitor who is working under the direct supervision of a Project Manager or Principal Investigator certified by the Register of Professional Archaeologists (RPA) (qualifications derived from 36 CFR Part 61). Ground-disturbing activities include, but are not limited to, pavement/asphalt removal, boring, trenching, grading, excavating, and the demolition of building foundations. The archaeological monitor will observe ground-disturbing activities in these locations to a depth of 3 feet. A preconstruction information and safety meeting shall be held to make construction personnel aware of archaeological monitoring procedures and the types of archaeological resources that might be encountered.</p> <p>In the event that archaeological resources are encountered during archaeological monitoring, the monitor may halt work in the immediate vicinity until the discovery is assessed by the project archaeologist and appropriate treatment is determined. Additional monitoring recommendations may be made at that</p>	<p>Conduct preconstruction information and safety meeting with construction personnel</p> <p>Verify discovery of human remains procedures are included in construction specifications and requirements</p>		

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>time. If archaeological resources are encountered by construction personnel in portions of the project area where a monitor is not present, work in the immediate vicinity shall be suspended until the project archaeologist investigates the discovery and determines appropriate treatment.</p> <p>In the event that human remains are discovered, work in the immediate vicinity of the discovery will be suspended and additional measures will be implemented as required by state law.</p> <p>Upon completion of all ground-disturbing activities associated with this project, an Archaeological Resources Monitoring Report shall be prepared documenting construction activities observed, including copies of all daily archaeological monitoring logs. If discoveries are made during ground-disturbing activities, the report will also document the associated cultural materials and the methods of treatment as determined appropriate by the archaeologist.</p>			
	<p>MM CUL-2 Per CEQA Guidelines Section 21083.2(c), mitigation measures shall be required if unique archaeological resources are not preserved in place or not left in an undisturbed state. When this is not feasible, Section 15126.4(b)(3)(C) warrants a data recovery plan, “which makes provisions for adequately recovering scientifically consequential information from and about the historical resource,” and “shall be prepared and adopted prior to any excavation being undertaken.” The Expo Authority shall prepare such a plan to identify measures to reduce the project’s impacts to the Santa Monica Air Line a California Register–eligible resource.</p>	Verify preparation of a data recovery plan	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Metro • Construction

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
Hydrology/ Water Quality	<p>MM WQ-1The Expo Authority shall grade the Expo/Westwood Station and associated station parking facility and provide a stormwater drainage system with detention facilities and/or pervious pavement adequate to convey runoff from the Expo/Westwood Station during a 100-year storm event to prevent on-site flooding. The Expo Authority shall also implement stormwater detention facilities and/or pervious pavement for parking lots to reduce the off-site peak runoff from the Expo/Westwood Station and associated parking lots to existing condition levels. All detention facilities shall be designed to drain within 48 hours to minimize vector control and human safety concerns.</p> <p>The Expo Authority shall include these facilities and their design specifications in the engineering plans. Use of pervious pavement shall be consistent with the Standard Urban Stormwater Mitigation Plan (SUSMP) and Municipal National Pollution Discharge Elimination System (NPDES) Permit limitations on infiltration best management practices (BMPs). Construction and operation of these BMPs shall be incorporated as part of the proposed project and subject to all applicable existing regulatory requirements.</p>	Verify inclusion of facilities, design specifications, and BMPs in engineering plans	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority/LADPW • Expo Authority • Prior to Construction
	<p>MM WQ-2(b) The Expo Authority shall design drainage and flood protection improvements to remove the portion of the proposed project from the Federal Emergency Management Agency (FEMA)-defined 100-year flood hazard area. This shall include sufficient drainage structures to pass existing flood flow from areas up-gradient from the portion of the proposed project to areas down-gradient, such that there is no net change in off-site flooding and flood flows or on storm drain system capacity. This may include rerouting of flood waters from Westwood Boulevard at locations further north from the portion of the</p>	Verify inclusion of drainage and flood protection improvements and their design specifications in engineering drawings Verify issuance of CLOMR prior to	Expo Authority	<ul style="list-style-type: none"> • LACDPW/FEMA • Expo Authority • Prior to Construction and Prior to Operation

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>proposed project to bypass the alignment corridor and Westwood Boulevard intersection.</p> <p>Prior to the beginning of construction activities, the Expo Authority shall submit to FEMA an application for and obtain a Conditional Letter of Map Revision (CLOMR) and shall implement all conditions imposed by FEMA. The CLOMR would ensure that the project design is sufficient for removing the portion of the proposed project from the 100-year flood hazard area. Prior to the beginning of operation, the Expo Authority shall obtain a Letter of Map Revision (LOMR), and potentially a No Rise Certificate, indicating that construction and implementation of the designed improvements have been conducted in accordance with the CLOMR and FEMA requirements and that the proposed project alignment corridor has been effectively removed from the 100-year flood hazard area.</p> <p>Implementation of Segment 1 (Expo ROW) would use fill material, or place other structures (such as station platforms) in the floodplain, that could impede flood flows or reduce flood storage capacity. Therefore, MM WQ-2(b) shall not include use of fill material within an existing floodplain unless sufficient additional detention and flood storage is also provided. Any detention used as part of the flood improvements shall be designed to drain within 48 hours to minimize vector control and human safety issues.</p> <p>The Expo Authority shall include any facilities used for flood improvements and their design specifications in the engineering drawings. As such, construction and operation of these facilities shall be incorporated as part of the proposed project and subject to existing regulatory requirements.</p>	<p>construction activities and LOMR prior to operation</p>		

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
Noise and Vibration	<p>MM NOI-1 Solid, impervious objects that block the direct path between the sound source and the receiver shall be installed at the proposed locations indicated in FEIR Table 3.12-10 to reduce the sound level at the receiver, with sound walls being the preferred option. Sound walls are a common noise mitigation measure and have been widely used on highways and on rail transit lines. Alternatively, the Expo Authority may construct a landscaped berm parallel to the rail line or use low berms with a low wall along the top. As long as the wall, berm, or berm/wall combination reaches the same elevation, the acoustical performance will be equivalent. Except where noise impacts are due to special trackwork at crossovers and turnouts, the predicted noise impact can be eliminated with sound walls or berms that extend to heights of:</p> <ul style="list-style-type: none"> • 6 to 8 ft above the top of rail for ballast and tie track sections • 3.5 to 4 ft above the top of rail on aerial structures <p>The wall heights can be reduced by 6 to 12 inches if an acoustically absorbent surface treatment is used on the track side of the wall.</p> <p>A 7 to 9 dB reduction in operational noise can be expected in all locations where sound walls block direct lines of sight between the sound source and the receiver. This excludes receivers located in high-rise apartment buildings.</p> <p>Additionally, in areas where crossovers would be located near sensitive receptors, low-impact frogs may be either an alternative to sound walls or supplemental measure to sound walls. There are several different types of low-impact frogs that could be used.</p> <p>If during Final Engineering or Operations it is determined that measures described above are not practicable or do not</p>	<p>Verify inclusion of sound mitigation, including walls, insulation and/or berms of appropriate heights in engineering plans. If measures are impracticable, verify inclusion of another alternative</p> <p>Verify installation of prescribed devices, including berm/walls, acoustically absorbent surface treatment, low-impact frogs, or sound walls</p>	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Metro • Final Design and Construction

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>provide sufficient noise mitigation, the Expo Authority or Metro, as appropriate, shall provide for sound insulation of residences and other noise-sensitive facilities as a another alternative that could be used. Sound insulation involves upgrading or replacing existing windows and doors, and weather stripping windows and doors. Installing a mechanical ventilation system may be needed so that windows do not need to be opened for ventilation.</p> <p>The mitigation measures will ensure that noise levels will be below the applicable FTA impact threshold for moderate noise impact.</p>			
	<p>MM NOI-2 The volume of crossing bells shall be reduced to within 5 dBA of the bottom of the California Public Utilities Commission (CPUC)-approved range. This step is sufficient to reduce the bell noise to below the applicable Federal Transportation Authority (FTA) impact thresholds.</p>	Verify compliance with FTA noise level criteria	Metro/ Expo Authority	<ul style="list-style-type: none"> • Metro • Metro • Operation
	<p>MM NOI-3 If wheel squeal occurs that is sufficient to cause community noise levels that exceed the applicable FTA moderate impact thresholds, measures to reduce wheel squeal, such as rail or wheel lubrication, will be considered by Metro. If, by the end of the first year of service, noise from wheel squeal cannot be reduced to below the FTA moderate noise impact thresholds, the noise mitigation measures discussed in measure MM NOI-1 would be applied to further reduce levels of wheel squeal so that the levels are below the FTA moderate impact thresholds. No additional mitigation is required.</p>	Verify compliance with FTA noise level criteria	Metro/ Expo Authority	<ul style="list-style-type: none"> • Metro • Metro • Operation

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>MM NOI-4 Noise levels would be sufficient to warrant mitigation at 4 of the 15 proposed TPSS sites; see FEIR Table 3.12-15. All noise impacts can be eliminated by specifying a noise limit of 44 dBA at 50 ft from any part of the TPSS units that would be used at sites 1, 2, 3, and 4.</p>	<p>Monitor noise levels at these sites</p>	<p>Metro/ Expo Authority</p>	<ul style="list-style-type: none"> • Metro • Metro • Operation
	<p>MM NOI-6 Further site-specific testing shall be performed during the Final Design where potential for vibration impact has been identified. Where vibration impact is still predicted, the vibration energy transmitted into the ground shall be decreased by (1) use of low impact frogs to reduce the banging at special trackwork, and/or (2) installation of a resilient layer between the tracks and the ground. There are a number of different approaches to installing resilient elements in track to reduce vibration. Vibration-reducing design specifications for the track sections shall be determined in consultation with a qualified vibration scientist or engineer during the design phase.</p> <p>The specific locations where vibration mitigations are expected to be required are listed in FEIR Table 3.12-24 (Anticipated Vibration Mitigation Locations). Final type, location, and extent of such mitigations will be determined in Final Design. The mitigation measures will be designed to ensure that vibration levels will be below the FTA impact threshold that is applicable to Detailed Vibration Assessments. The threshold for FTA Category 2 (residential) land uses is a band-maximum vibration level of 72 VdB at frequencies greater than 8 Hz.</p>	<p>Verify completion of site specific testing</p> <p>Verify installation of vibration-reducing design specifications and incorporation into engineering plans</p>	<p>Expo Authority</p>	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Final Design

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
Paleontological Resources	<p>MM PAL-1 Per CEQA Guidelines the Expo Authority shall retain a qualified paleontologist to prepare and implement a Paleontological Resources Management Plan (PRMP) to the standards detailed in the <i>Paleontological Resources Technical Background Report</i>.</p> <p>Monitoring is required at the surface and below of Segment 1 (Expo ROW) from station 540+00 to 600+00, where there are known surface exposures of Quaternary old alluvial fan deposits of high paleontological sensitivity.</p> <p>In other project areas, the paleontologist will examine subsurface work to adjust monitoring to cover Quaternary old alluvial fan sediments only.</p> <p>Upon completion of all monitoring and mitigation activities, the paleontologist will submit a final report to the Expo Authority summarizing the work and confirming that all recommendations were implemented.</p>	Verify retention of a qualified paleontologist, and preparation and implementation of a Paleontological Resources Management Plan	Expo Authority	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Prior to Construction
Parks and Community Facilities	<p>MM PAR-1 For those community facilities that utilize on-street parking, the Expo Authority shall provide reasonably proximate parking to replace permanently lost parking spaces based on the number of removed spaces that are utilized. Prior to construction of the proposed project, the Expo Authority has completed a parking demand study for affected community facilities to determine the appropriate amount of parking replacement that would be required. The location of the replacement parking would be in accordance with the requirements listed in MM TR-9, MM TR-9(a) and MM TR-9(b) in FEIR Section 3.2 (Transportation/Traffic).</p>	Verify acquisition of replacement parking areas	Expo Authority	<ul style="list-style-type: none"> • Expo Authority/LADRP/SMCCSD • Expo Authority • Final Design

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
Safety and Security	MM SAF-1 Prior to commencement of operation of the proposed project, Metro shall coordinate with the cities of Culver City, Santa Monica, and Los Angeles and inform the appropriate community safety provider of Metro's emergency response procedures as incorporated into Metro's standard operating procedures. Metro shall provide a detailed description of their emergency response procedures so as to provide other public safety providers with the knowledge of Metro's response plan in order to provide a fast, controlled and coordinated response to the various types of emergencies that may occur on the Metro rail system. Additionally, Metro shall encourage the cities of Culver City, Los Angeles, and Santa Monica to update their emergency response procedures to address implementation of the proposed project.	Verify coordination with the cities of Santa Monica, Culver City and Los Angeles Provide appropriate community safety providers with provisions of Metro's emergency response procedures	Metro/ Expo Authority	<ul style="list-style-type: none"> • Metro • Metro • Prior to Operation
Construction Impacts				
Transportation/ Traffic	MM CON-1 To ensure that continued vehicular access to community facilities is maintained, the Expo Authority shall provide at least one lane of traffic in each direction on access cross streets that are not going to be dead-ended during construction. If one lane of traffic cannot be maintained, the Expo Authority shall provide a detour route for motorists.	Verify incorporation of traffic lane requirements into construction specifications	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority/LADOT/ Culver City Public Works/SMPCDD • Expo Authority • Construction

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>MM CON-2 Before the start of construction, Worksite Traffic Control Plans (WTCP) and Traffic Circulation Plans, including identification of detour requirements, will be formulated in cooperation with the City of Los Angeles, City of Santa Monica, Culver City and other affected jurisdictions (County, State) in accordance with the Work Area Traffic Control Handbook (WATCH) manual and Manual on Uniform Traffic Control Devices (MUTCD) as required by the relevant municipality. The WTCPs will be based on lane requirements and other special requirements defined by the Los Angeles City Department of Transportation (LADOT), the City of Santa Monica, and Culver City for construction within their city and from other appropriate agencies for construction in those jurisdictions. Also, the WTCP's shall be designed to maintain designated Safe Routes to School wherever possible during times of the year when nearby schools are in session.</p>	<p>Verify completion of Worksite Traffic Control Plans and Traffic Circulation Plans and incorporation into Final Design and construction specifications</p>	<p>Expo Authority/ Design Build Contractor</p>	<ul style="list-style-type: none"> • Expo Authority/ LADOT/Culver City Public Works/SMPCDD • Expo Authority • Construction
	<p>MM CON-3 No designated Major or Secondary Highway will be closed to vehicular or pedestrian traffic except at night or on weekends, unless approval is granted by the jurisdiction in which it is located.</p>	<p>Verify incorporation of highway access specification in Final Design and consultation with relevant jurisdiction</p>	<p>Expo Authority/ Design Build Contractor</p>	<ul style="list-style-type: none"> • Expo Authority/LADOT/ Culver City Public Works/SMPCDD • Expo Authority • Construction
	<p>MM CON-4 The Expo Authority's contractor will develop preferred haul route plans for the removal of excavated material. Construction will be scheduled and haul routes will be planned to minimize conflicts during school arrival and dismissal times.</p>	<p>Verify inclusion of haul truck route requirements into Final Design and Construction Specifications</p>	<p>Expo Authority/ Design Build Contractor</p>	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	MM CON-5 The Expo Authority will coordinate with other major construction projects within a 1-mile radius of the construction site to avoid, to the maximum extent practicable, overlapping haul routes with other public or private construction projects.	Verify coordination with construction projects Verify incorporation of haul route avoidance when overlapping with nearby construction projects into Final Design and Construction Specifications	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction
	MM CON-6 Unless otherwise specified in the Worksite Traffic Control Plan, the Expo Authority shall maintain access to the businesses that rely on on-street parking and pedestrian access during construction. If it is necessary to temporarily restrict access to a business, the Expo Authority shall provide the facility advance notice of restrictions. Unless otherwise specified in the Worksite Traffic Control Plan, the Expo Authority shall schedule access restrictions to off-peak hours or during times when the business is closed and shall not fully restrict access for the total hours of operation of a business on any given day of operation.	Verify completion of worksite traffic controls with inclusion of parking and access restriction limitations Verify incorporation into Final Design and Construction Specifications	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction
	MM CON-7 Relative to maintaining access to businesses, construction activities shall be sequenced to minimize the temporary removal of multiple blocks of on-street parking at one time unless otherwise specified by the Worksite Traffic Control Plan.	Verify incorporation into Final Design and Construction Specifications	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction

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Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	MM CON-8 Contractors shall use temporary special signage to inform the public of closure information in advance of temporary closures. Signage shall also provide special access directions, if warranted.	Verify incorporation into Final Design and Construction Specifications	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction
Aesthetics	MM CON-9 To the extent possible, the Expo Authority shall protect the Sara Berman Greenway during construction of Segment 1 (Expo ROW), including the placement of a construction barrier around the perimeter of the Greenway, and notifying contractors of restrictions. Substantial damage to the Greenway caused by construction activities shall be repaired as appropriate during or after the course of construction, which could include the provision of replacement landscaping.	Verify incorporation into Final Design and Construction Specifications.	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction
Biological Resources	MM CON-10 During construction of the proposed project, the removal of trees, shrubs, or weedy vegetation should be avoided during the February 1 through August 31 bird nesting period. If the removal of trees, shrubs, or weedy vegetation were to occur during the nesting period, a survey for nesting birds shall be conducted by a qualified wildlife biologist no earlier than 14 days prior to the removal of trees, shrubs, grassland vegetation, buildings, or other construction activities. Survey results shall be valid for 21 days following the survey. The area surveyed should include all construction areas with the potential to support nesting birds protected by the MBTA and/or Section 3503 of the <i>Fish and Game Code</i> , as well as areas within 75 feet of the boundaries, as practicable or as determined by the biologist in the field, of the areas to be cleared or as otherwise determined by the biologist. If no vegetation or tree removal is proposed during the nesting period, no surveys would be required. In the event that an active nest is discovered in the areas to be	Verify completion of survey. Incorporate proper procedure into Construction Specifications.	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>cleared, or in other habitats within 75 feet of construction boundaries, clearing and construction should be postponed within this area for at least two weeks or until a wildlife biologist has determined that the young have fledged (left the nest), the nest is vacated, and there is no evidence of second nesting attempts. Other buffers or construction requirements may be determined by the wildlife biologist in the field as practicable.</p>			
Hazards and Hazardous Materials	<p>MM CON-11 Prior to any ground disturbance or demolition, the Expo Authority shall:</p> <ul style="list-style-type: none"> • Prepare an Environmental Site Assessment (ESA Phase II) for specific sites identified in the ESA Phase I prepared for the proposed project. The Phase IIs shall include soil sampling for contamination on sites where releases of hazardous materials are known and groundwater sampling where soil contamination is detected. Based on the age of structures identified along the alignment, the potential for exposure to mold, lead, and asbestos should also be studied. • If contaminated areas are identified within the construction area, the Expo Authority shall coordinate with the appropriate regulatory agencies to determine the need for further investigation and/or remediation of the contaminated site. 	<p>Verify preparation of site assessment and coordination with appropriate regulatory agencies</p>	<p>Expo Authority/ Design-Build Contractor</p>	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Prior to Construction

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Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>MM CON-12 In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment during construction of the proposed project is encountered, construction activities in the immediate vicinity of the contamination shall cease immediately. If contamination is encountered, measures shall be prepared and implemented that (1) identifies the contaminants of concern and (2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures would include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., City Fire Department). A Site Health and Safety Plan that meets Cal-Office of Safety and Health Administration (OSHA) requirements shall be prepared and in place prior to commencement of work in any contaminated area.</p>	<p>Verify incorporation of appropriate measures into Construction Specifications and preparation of Site and Health Safety Plan, if warranted</p>	<p>Expo Authority/ Design Build Contractor</p>	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction
<p>Noise and Vibration</p>	<p>MM CON-13 The Expo Authority’s contractor shall develop a Noise Control Plan demonstrating how he will achieve the more restrictive of the <i>Metro Design Criteria</i> noise limits and the noise limits of the city noise control ordinance. The plan shall include measurements of existing noise, a list of the major pieces of construction equipment that will be used, and predictions of the noise levels at the closest noise-sensitive receptors (residences, hotels, schools, churches, temples, and similar facilities). The Noise Control Plan will need to be approved by the Expo Authority prior to initiating construction.</p> <p>Where the construction cannot be performed in accordance with the requirements of the Metro or applicable city noise</p>	<p>Verify development of a Noise Control Plan and noise monitoring during construction</p>	<p>Expo Authority/ Design Build Contractor</p>	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Prior to and During Construction

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	limits, the contractor shall investigate alternative construction measures that would result in lower sound levels. The contractor shall conduct noise monitoring to demonstrate compliance with contract noise limits.			
	<p>MM CON-14 The contractor shall utilize a combination of the following options of best management practices for noise abatement to comply with the <i>Metro Design Criteria</i>:</p> <ul style="list-style-type: none"> • The contractor shall utilize specialty equipment equipped with enclosed engines and/or high-performance mufflers as commercially available. • The contractor shall locate equipment and staging areas as far from noise-sensitive receptors as possible. • The contractor shall limit unnecessary idling of equipment. • The contractor shall install temporary noise barriers as determined by the Noise Control Plan. • The contractor shall reroute construction-related truck traffic away from residential streets to the extent permitted by the relevant municipality. • The contractor shall avoid impact pile driving near noise-sensitive receptors (residences, hotels, schools, churches, temples, and similar facilities) where possible. Where geological conditions permit their use, drilled piles or a vibratory pile driver is generally quieter. 	Verify incorporation of best management practices in Construction Specifications	Expo Authority/Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction

Table 1 Mitigation Monitoring and Reporting Program for Expo Phase 2 Project

Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
Parks and Community Facilities	MM CON-15 Unless otherwise specified in the Worksite Traffic Control Plan, the Expo Authority shall maintain vehicular and pedestrian access to the identified community facilities (refer to FEIR Table 4.6-4 [Access, Parking, and Service Area Impacts on Community Facilities]) during construction. If it is necessary to temporarily restrict access to a community facility, the Expo Authority shall provide the facility notice of any restriction. Unless otherwise specified in the Worksite Traffic Control Plan, the Expo Authority shall schedule access restrictions to off-peak hours or during times when the community facility is closed and shall not restrict access for the total hours of operation of a community facility on any given day of operation.	Verify incorporation into Construction Specifications. Verify issuance of notices to affected facilities prior to restriction of access.	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction
	MM CON-16 Near the identified community facilities construction activities shall be sequenced to minimize the temporary removal of multiple blocks of on-street parking at one time unless otherwise specified by the Worksite Traffic Control Plan.	Verify completion of worksite traffic controls with inclusion of sequential parking removal requirements.	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority/ LADOT/ SMPD • Expo Authority • Construction
Safety and Security	MM CON-17 The Expo Authority shall maintain access to all police and fire stations at all times during construction.	Verify incorporation of Construction Specifications	Expo Authority/ Design Build Contractor	<ul style="list-style-type: none"> • Expo Authority/ LAPD/LAFD/ CCPD/CCFD/ SMPD/SMFD/Expo Authority • Construction

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Impact Area	Mitigation Measures	Monitoring Action	Party Responsible for Implementing Mitigation	<ul style="list-style-type: none"> • Enforcement Agency • Monitoring Agency • Monitoring Phase
	<p>MM CON-18 During construction of the proposed project, the Expo Authority shall coordinate with the cities of Culver City, Santa Monica, and Los Angeles and inform the appropriate community safety provider of the construction emergency response procedures as incorporated into the Contractor's Systems Safety Program Plan. The Plan will include a detailed description of all emergency response procedures that shall be implemented by the contractor, so as to provide other public safety providers with the knowledge of the contractor's response plan in order to provide a fast, controlled, and coordinated response to the various types of emergencies. Additionally, the Expo Authority shall encourage the cities of Culver City, Santa Monica, and Los Angeles to update their emergency response procedures to address construction of the proposed project.</p>	<p>Verify coordination with the cities of Culver City, Santa Monica, and Los Angeles</p> <p>Verify availability and understanding of the Contractor's Systems Safety Program Plan with these cities</p>	<p>Expo Authority/ Design Build Contractor</p>	<ul style="list-style-type: none"> • Expo Authority • Expo Authority • Construction

KEY:

LADRP: Los Angeles Department of Recreation and Parks
 SMCCSD: Santa Monica Cultural and Community Services Department
 SMPCCDD: Santa Monica Planning and Community Development Department
 LADPW: Los Angeles Department of Public Works
 LADOT: Los Angeles Department of Transportation
 LAPD: Los Angeles Police Department

LAFD: Los Angeles Fire Department
 SMPD: Santa Monica Police Department
 SMFD: Santa Monica Fire Department
 CCPD: Culver City Police Department
 CCFD: Culver City Fire Department