

3. Environmental Analysis

3.0.1 Introduction

This section describes the structure and format of the analysis for each of the 17 environmental resource areas addressed herein and defines the terminology used in characterizing the level of significance for each potential impact from the three Build Alternatives, design options, and MSF site options and, where appropriate, associated mitigation. Chapter 3 presents, and in some cases summarizes, the evaluations made in the Impacts Reports which are provided as appendices to this Recirculated Draft EIR.

The following 17 resource areas addressed in this chapter were determined by Metro to require further evaluation.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Geology, Seismicity, Soils, and Paleontological Resources
- Growth Inducing Impacts
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise and Vibration
- Population and Housing
- Public Services and Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

For those resource areas where it was determined that no impact would occur (i.e., agriculture and forestry resources, mineral resources, and wildfire), a brief evaluation of the no impact determination is provided in Chapter 4, Other CEQA Required Topics. The No Project Alternative is addressed in Chapter 5, Comparison of Project Alternatives. The analysis of each resource area includes the following components:

- Introduction – provides an introduction to the resource area analysis.
- Regulatory Framework – contains an overview of the federal, state, regional, and local laws and regulations that apply to the Project relative to each resource area.
- Methodology – identifies how potential impacts on a resource area were determined.

- **Thresholds of Significance** – presents the criteria against which the significance of impacts is judged for the resource area. The thresholds of significance used in the analysis of Project impacts reflect guidance provided in Appendix G of the State CEQA Guidelines.
- **Existing Setting** – describes current conditions with regard to the resource area. State CEQA Guidelines Section 15125 states that “An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives.”
- **Impact Evaluation** – states whether a given impact meets or exceeds a threshold of significance. Impacts are determined without consideration of mitigation measures, and if any mitigation measures are applicable, impacts are determined again with consideration of applicable mitigation measures. For purposes of determining significance, impacts were compared to the environmental baseline conditions, as further described in the terminology discussion below.
- **Project Measures and Mitigation Measures** – lists the project measures that are relevant to the resource area and the mitigation measures that are recommended to reduce or avoid a significant impact if applicable.
- **Significance After Mitigation** – summarizes the impact conclusions for each impact, based on the applicable threshold of significance. This includes a determination of any significant impacts that would remain significant even after all feasible mitigation measures are applied.

3.0.2 Terminology Used in This Environmental Analysis

3.0.2.1 Environmental Baseline

Section 15125 of the State CEQA Guidelines states that “[g]enerally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published...”

As described in Section 2.1 of Chapter 2, Project Description, the Notice of Preparation (NOP) was published on May 31, 2019.¹ As such, 2019 generally serves as the baseline year for characterizing existing conditions in the environmental analysis. However, where existing conditions data specific to 2019 do not accurately represent baseline conditions, would be misleading or without informational value, or where more recent data is available for the subject resource area, the Draft EIR explains why this was the case and identifies the alternative information used to represent baseline conditions.

¹ Metro published the NOP joined with a Notice of Intent (NOI); the NOI was published to comply with the National Environmental Policy Act (NEPA) procedures. Refer to Section 2.1 of Chapter 2, Project Description for an explanation of the project background.

3.0.2.2 Impacts and Mitigation

For each potential impact of the Project, this Recirculated Draft EIR applies significance criteria specific to the impact category in question (e.g., transportation and traffic). These criteria establish a significance threshold which, if exceeded, triggers the need for mitigation of the impact under review. Project and/or mitigation measures have been identified to address impacts. Project measures are incorporated as part of the Project and consist of design features, best management practices, or other measures required by law and/or permit approvals. These measures are components of the Project. Where relevant, the measures were included in the impact analyses. Mitigation measures are additional actions, not otherwise part of the Project, that are designed to avoid, minimize, or compensate for adverse or significant impacts. These measures are required where significant or adverse impacts have been identified based on the impact analyses.

The following terms are used to describe each impact and, where significant impacts are determined, how mitigation measures are to be applied:

- No Impact – No impact occurs when the threshold of significance does not apply to the Project or if the Project would not create an impact.
- Less Than Significant Impact – A less than significant impact occurs when an impact from the Project would not reach or exceed the threshold of significance, therefore not causing a substantial adverse change in the environment or where impacts have been reduced to less than significant after application of mitigation.
- Significant Impact – A significant impact occurs when an impact from the Project reaches or exceeds the threshold of significance, therefore causing (or potentially causing) a substantial adverse change in the environment.
- Significant Unavoidable Impact – Per Section 15126.2(b) of the CEQA Guidelines, a significant unavoidable (sometimes referred to as ‘significant and unavoidable’) impact occurs when a significant impact from the Project cannot be reduced to a less than significant level through any feasible mitigation measure(s).
- Project Measures – Project Measures are design features, best management practices, or other measures required by law and/or permit approvals that are components of the Project.
- Mitigation – Mitigation refers to measures that would be implemented to avoid or lessen potentially significant impacts. Mitigation includes:
 - avoiding the impact completely by not taking a certain action or parts of an action;
 - minimizing the impact by limiting the degree or magnitude of the action and its implementation;
 - rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
 - reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and/or

- compensating for the impact by replacing or providing substitute resources or environments.

The mitigation measures would be proposed as a condition of project approval and would be monitored to ensure compliance and implementation.

Note that the Recirculated Draft EIR “shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy” (State CEQA Guidelines, Section 15126.4(a)(1)). In addition, the discussion of mitigation measures “shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project” (State CEQA Guidelines, Section 15126.4(a)(1)(A)). Mitigation measures must be enforceable through permit conditions, agreements, or other legally binding instruments (State CEQA Guidelines, Section 15126.4(a)(2)). Note, however, that if a mitigation measure cannot legally be imposed or implemented, the lead agency need not recommend it or analyze it (State CEQA Guidelines, Section 15126.4(a)(5)).

As further discussed in Chapter 5, Comparison of Project Alternatives, in accordance with Section 15126.6 of the State CEQA Guidelines, four alternatives (including the No Project alternative) were selected and carried forward for further consideration in this Recirculated Draft EIR to evaluate whether such alternatives would avoid or substantially reduce any of the significant environmental impacts associated with the proposed project that are identified in the following sections.