# 4. Other CEQA Required Topics

Section 15126 of the CEQA Guidelines identifies the subjects that shall be discussed in an EIR including: effects determined not to be significant, irreversible environmental changes, and growth-inducing effects. Effects determined not to be significant and significant irreversible environmental changes are discussed in the following sections. This chapter also summarizes significant and unavoidable impacts identified in Chapter 3 and potential secondary effects that could occur as result of implementation of the required mitigation measures. Growth inducing effects are addressed in Section 3.17 of this Recirculated Draft EIR.

## 4.1 Effects Determined Not to be Significant

Section 15128 of the CEQA Guidelines states "an EIR shall contain a brief statement indicating reasons that various possible effects of a project were determined not to be significant and not discussed in detail in the EIR." Metro has determined that the Project would not have the potential to cause significant impacts related to agricultural and forestry resources, mineral resources, and wildfire. Similarly, there is no potential for the Project to combine with past, present, and reasonably probable future projects to create a cumulative impact to these resources. These resource areas are briefly addressed in this section. Each resource area was assessed using Appendix G of the CEQA Guidelines.

### 4.1.1 Agricultural and Forestry Resources

#### 4.1.1.1 Impact AFR-1: Conversion of Farmland to Non-Agricultural Use

**Impact AFR-1: Would a Build Alternative convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

##### 4.1.1.1.1 Operational and Construction Impacts

**Base Alternatives, Design Options, and MSF Site Options**

The detailed study area (DSA) is located in densely developed areas on what the California Department of Conservation's Important Farmland map designates as Urban and Built-Up Land (California Department of Conservation, 2022). Areas designated as Urban and Built-Up Land are not considered Important Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) under CEQA (Public Resources Code Sections 21060.1 and 21095 and CEQA Guidelines Appendix G). The California Department of Conservation does not identify any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the DSA. The closest land designated as Unique Farmland is in the Whittier Narrows Recreation Area which is outside of the DSA. The Build Alternatives, design options, and MSF site options would neither directly affect nor result in the conversion of this land to non-agricultural uses; therefore, no impact would occur.

## 4.1.1.2 Impact AFR-2: Conflict with Existing Zoning for Agricultural Use or a Williamson Act Contract

**Impact AFR-2: Would a Build Alternative conflict with existing zoning for agricultural use, or a Williamson Act contract?**

### 4.1.1.2.1 Operational and Construction Impacts

#### Base Alternatives, Design Options, and MSF Site Options

There are no identified agricultural resources in the DSA, nor does the DSA contain areas zoned for agricultural use. Los Angeles County does not participate in the Williamson Act program; thus, no parcels within the DSA are under a Williamson Act contract. The Build Alternatives, design options, and MSF site options would not conflict with existing zoning for agricultural use or a Williamson Act contract; therefore, no impact would occur.

## 4.1.1.3 Impact AFR-3: Conflict with Existing Zoning for Forestland

**Impact AFR-3: Would a Build Alternative conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

### 4.1.1.3.1 Operational and Construction Impacts

#### Base Alternatives, Design Options, and MSF Site Options

The DSA is located in a densely developed urban areas. There are no areas of forest land as defined in PRC Section 12220(g) or timberland as defined in PRC Section 4526 within the DSA.[1] The Build Alternatives, design options, and MSF site options would not conflict with existing zoning for, or cause rezoning of, forest land or timberland; therefore, no impact would occur.

## 4.1.1.4 Impact AFR-4: Loss or Conversion of Forest Land

**Impact AFR-4: Would a Build Alternative result in the loss of forest land or conversion of forest land to non-forest use?**

1 Section 12220(g) defines forest land as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

#### 4.1.1.4.1 Operational and Construction Impacts

##### Base Alternatives, Design Options, and MSF Site Options

As discussed in **Section 4.1.1.3**, no forest land is located in the DSA. The Project would not change the existing environment in a manner that would result in the conversion of forest land to other kinds of land uses. Therefore, no impact would occur during construction or operation of the Base Alternatives, design options, and MSF site options.

### 4.1.1.5 Impact AFR-5: Conversion of Farmland or Forest Land

**Impact AFR-5: Would a Build Alternative involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

#### 4.1.1.5.1 Operational and Construction Impacts

##### Base Alternatives, Design Options, and MSF Site Options

No forest land or farmland is located within the DSA. The Build Alternatives, design options, and MSF site options would not cause changes in the environment that could result in conversion of farmland or forest land to different uses; therefore, no impact would occur.

## 4.1.2 Mineral Resources

Mineral resources are naturally occurring chemical compounds that are formed from inorganic and organic substances. Mineral Resources include oil and natural gas, and commercially viable minerals and aggregate resources, including areas suitable for the drilling for and production of oil and natural gas, and surface mining activities.

### 4.1.2.1 Impact MNR-1: Loss of Availability of a Mineral Resource

**Impact MNR-1: Would a Build Alternative result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?**

#### 4.1.2.1.1 Operational and Construction Impacts

##### Base Alternatives, Design Options, and MSF Site Options

The DSA overlies a small section of the Los Angeles East Oil Field and Bandini Oil Field wherein a limited number of active oil wells are located in the City of Commerce. As discussed in the Hazards and Hazardous Materials Section of this Recirculated Draft EIR (Section 3.8.5), the May 2021 Final Draft ISA Report did not identify idle, active, or abandoned/plugged wells within the Alternative 1 alignment, station sites, or within the Commerce MSF site option. Additionally, active oil/gas wells,

plugged dry oil/gas wells, and idle oil/gas wells are located in the vicinity of the alignment west of South Tubeway Avenue, and two plugged dry oil/gas wells are located under the Citadel Outlets parking lot southwest of Smithway Street. Plugged dry oil/gas wells and idle oil/gas wells are located south and west of the Commerce MSF site option boundaries. The May 2021 Final Draft ISA Report identified plugged dry holes within the Montebello MSF site option (Attachment A of Appendix I, Hazards and Hazardous Materials Impacts Report, Figure 4B). The City of Commerce 2020 General Plan (City of Commerce, 2008) notes that the presence of these wells does not necessarily limit development of the area since sophisticated drilling techniques have enabled well operators to centralize pumping operations at considerable distances from the petroleum deposits.

No other known mineral resources that are of value to region or state located within the DSA. The greater Los Angeles area is the nation's leading producer for sand and gravel. Although the DSA transverses the San Gabriel River and Rio Hondo, there are no commercially viable sand and gravel resources in the area (City of Pico Rivera, 2014a). The Build Alternatives, design options, and MSF site options would neither directly nor indirectly result in the loss of availability of a known mineral resource that would be of value to the region and residents of California; therefore, no impact would occur.

## 4.1.2.2 Impact MNR-2: Loss of Availability of a Mineral Resource Delineated on a Local Plan

**Impact MNR-2: Would a Build Alternative result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

### 4.1.2.2.1 Operational and Construction Impacts

#### Base Alternatives, Design Options, and MSF Site Options

As discussed in **Section 4.1.2.1.1**, the DSA overlies the Los Angeles East Oil Field and Bandini Oil Field. While the City of Commerce General Plan (City of Commerce, 2008) discusses the existence of oil fields, it notes that the presence of these wells does not necessarily limit development of the area since sophisticated drilling techniques have enabled well operators to centralize pumping operations at considerable distances from the petroleum deposits. Additionally, the City of Commerce does not delineate these oil fields or any locally important mineral resource recovery site on its general plan, specific plans, or other land use plans. Furthermore, the DSA does not include any areas designated by local jurisdictions as containing a mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan [(City of Montebello, 2016) (City of Pico Rivera, 2014b) (City of Whittier, 1993b, 2021) (Los Angeles County Department of Public Works, 2014ab)]. The Build Alternatives, design options, and MSF site options would not result in the loss of availability of a locally important mineral resource recovery site delineated on land use plans; therefore, no impact would occur.

# 4.1.3 Wildfire

Appendix G of the CEQA Guidelines determines wildfire impacts based on whether a proposed project would occur within or near a State Responsibility Area (SRA) or on lands classified as very high fire hazard severity zones. The Board of Forestry and Fire Protection is a Governor-appointed body, whose mission is to lead California in developing policies and programs that serve the public interest in environmentally, economically and socially sustainable forest and rangeland management; and a fire protection system that protects and serves the people of the state. One of its statutory responsibilities is to provide direction and guidance to the Department of California of Forestry and Fire Protection (CAL FIRE).

CAL FIRE's mission emphasizes the management and protection of California's natural resources; a goal that is accomplished through ongoing assessment and study of the State's natural resources and an extensive CAL FIRE Resource Management Program. CAL FIRE maintains a database of areas designated as a Very High Fire Hazard Severity Zone (VHFHSZ). The CAL FIRE database also identifies areas designated as an SRA and a Local Responsibility Area (LRA).[2] Cities and counties are required by law to adopt a comprehensive general plan with a safety element. Land use planning incorporates safety element requirements for SRAs and VHFHSZs.

For the evaluation of the Build Alternatives, design options, and MSF site options, the wildfire specialized study area is defined as the area within a 0.25 mile distance of the Base Alternative 1 and MSF site options. The specialized study area does not include an SRA. The closest SRA is approximately 1.8 miles northeast of the specialized study area in Puente Hills, an undeveloped transverse range in an unincorporated area of Los Angeles County. The closest existing LRA is 1.3 miles from the specialized study area within the foothills of Puente Hills and in the city of Whittier.

## 4.1.3.1 Impact WFR-1: Impair an Adopted Emergency Plan

**Impact WFR-1: If located in or near SRAs or lands classified as very high fire hazard severity zones, would a Build Alternative substantially impair an adopted emergency response plan or emergency evacuation plan?**

### 4.1.3.1.1 Operational and Construction Impacts

#### Base Alternatives, Design Options, and MSF Site Options

As discussed in **Section 4.1.3**, the specialized study area is located within a highly urbanized area. The area does not include any areas designated as an SRA or land classified as VHFHSZ and is not located near any areas designated as an SRA or land classified as VHFHSZ. The Build Alternatives, design options, and MSF site options would not be located in or near SRAs or land classified as VHFHSZ. Additionally, the Build Alternatives, design options, and MSF site options would not substantially impair an adopted emergency response plan or emergency evacuation plan; therefore, no impact would occur.

[2] California Public Resources Code (PRC) Sections 4125–4127 define a State Responsibility Area as lands in which the financial responsibility for preventing and suppressing wildland fire resides with the State of California. A Local Responsibility Area are areas under the jurisdiction of local entities (e.g., cities and counties).

## 4.1.3.2 Impact WFR-2: Expose Occupants to Pollutant Concentrations From a Wildfire

**Impact WFR-2: If located in or near SRAs or lands classified as very high fire hazard severity zones, would a Build Alternative due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

### 4.1.3.2.1 Operational and Construction Impacts

#### Base Alternatives and Design Options and MSF Site Options

As discussed in **Section 4.1.3**, the specialized study area is located within a highly urbanized area. The area does not include any areas designated as an SRA or land classified as VHFHSZ and is not located near any areas designated as an SRA or land classified as VHFHSZ. The Build Alternatives, design options, and MSF site options would not be located in or near SRAs or land classified as VHFHSZ. Additionally, the Build Alternatives, design options, and MSF site options would not create or exacerbate wildfire risks; therefore, no impact would occur.

## 4.1.3.3 Impact WFR-3: Infrastructure Exacerbate Fire Risk

**Impact WFR-3: If located in or near SRAs or lands classified as very high fire hazard severity zones, would a Build Alternative require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

### 4.1.3.3.1 Operational and Construction Impacts

#### Base Alternatives, Design Options, and MSF Site Options

As discussed in **Section 4.1.3**, the specialized study area is located within a highly urbanized area. The area does not include any areas designated as an SRA or land classified as VHFHSZ and is not located near any areas designated as an SRA or land classified as VHFHSZ. The Build Alternatives, design options, and MSF site options would not be located in or near SRAs or land classified as VHFHSZ. Additionally, the Build Alternatives, design options, and MSF site options would not require installation or maintenance of wildfire suppression or protection infrastructure; therefore, no impact would occur.

## 4.1.3.4 Impact WFR-4: Expose People of Structures to Significant Risk

**Impact WFR-4: If located in or near SRAs or lands classified as very high fire hazard severity zones, would a Build Alternative expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

#### 4.1.3.4.1 Operational and Construction Impacts

**Base Alternatives, Design Options, and MSF Site Options**

As discussed in **Section 4.1.3**, the specialized study area is located within a highly urbanized area. The area does not include any areas designated as an SRA or land classified as VHFHSZ and is not located near any areas designated as an SRA or land classified as VHFHSZ. The Build Alternatives, design options, and MSF site options would not be located in or near SRAs or land classified as VHFHSZ. Additionally, the Build Alternatives, design options, and MSF site options would not expose people or structures to risks associated with post-fire landslides or flooding; therefore, no impact would occur.

# 4.2 Significant and Unavoidable Impacts

This section is prepared in accordance with Section 15126.2(b) of the CEQA Guidelines, which requires the discussion of any significant environmental effects that cannot be avoided if a project is implemented. These include impacts that can be mitigated but cannot be reduced to a less than significant level. An analysis of environmental impacts caused by the Build Alternatives, design options, MSF site options, and the combinations thereof has been conducted and is contained in Chapter 3 of this Recirculated Draft EIR. According to the environmental impact analysis, there are no feasible mitigation measures to reduce significant impacts on historical resources (Impact CUL-1) or paleontological resources (Impact GEO-5) to less than significant. According to the environmental impact analysis, there are also no feasible measures to reduce the Project's cumulatively significant contribution to the cumulatively significant impacts on historical resources (Impact CUL-1) or paleontological resources (Impact GEO-5). As such, the construction of the Project would result in significant and unavoidable impacts related to Historical Resources (Impact CUL-1) and Paleontological Resources (Impact GEO-5) as summarized below and discussed in further detail in Section 3.6, Cultural Resources, and Section 3.16, Geology, Seismicity, Soils, and Paleontological Resources, of this Recirculated Draft EIR.

## 4.2.1 Construction

**Cultural Resources CUL-1:**

- Construction of Alternative 1 with the Commerce MSF site option would have a significant and unavoidable impact. It would cause a substantial adverse change in the significance of the Pacific Metals Company at 2187 Garfield Avenue and the Vail Field Industrial Addition historic district. This impact would remain significant and unavoidable with any of the design options. Alternative 1 with the Commerce MSF site option would also have a cumulatively considerable contribution to a cumulatively significant and unavoidable impact.

- Construction of Alternative 2 with the Commerce MSF site option would have a significant and unavoidable impact. It would cause a substantial adverse change in the significance of the Vail Field Industrial Addition historic district. This impact would also be cumulatively considerable. This impact would remain significant and unavoidable with any of the design options. Alternative 2 with the Commerce MSF site option would also have a cumulatively considerable contribution to a cumulatively significant and unavoidable impact.

- Construction of Alternative 3 with the Commerce MSF site option would have a significant and unavoidable impact. It would cause a substantial adverse change in the significance of the Pacific Metals Company at 2187 Garfield Avenue and the Vail Field Industrial Addition historic district. This impact would also be cumulatively considerable. This impact would remain significant and unavoidable with any of the design options. Alternative 3 with the Commerce MSF site option would also have a cumulatively considerable contribution to a cumulatively significant and unavoidable impact.

**Geology, Soils, Seismicity, and Paleontological Resources GEO-5:**

- Construction of Alternative 1 with the Commerce MSF site option or the Montebello MSF site option would have a significant and unavoidable impact. It would directly destroy subsurface paleontological resources by using the TBM to bore the tunnel. This impact would remain significant and unavoidable with any of the design options. Alternative 1 with the Commerce MSF site option or the Montebello MSF site option would also have a cumulatively considerable contribution to a cumulatively significant and unavoidable impact.

- Construction of Alternative 2 with the Commerce MSF site option would have a significant and unavoidable impact. It would directly destroy subsurface paleontological resources by using the TBM to bore the tunnel. This impact would remain significant and unavoidable with any of the design options. Alternative 2 with the Commerce MSF site option would also have a cumulatively considerable contribution to a cumulatively significant and unavoidable impact.

- Construction of Alternative 3 with the Commerce MSF site option or the Montebello MSF site option would have a significant and unavoidable impact. It would directly destroy subsurface paleontological resources by using the TBM to bore the tunnel. This impact would remain significant and unavoidable with any of the design options. Alternative 3 with the Commerce MSF site option or the Montebello MSF site option would also have a cumulatively considerable contribution to a cumulatively significant and unavoidable impact.

### 4.2.2 Operation

Operation of the Build Alternatives, design options, and MSF site options would not result in a significant and unavoidable impact.

## 4.3 Significant Irreversible Environmental Changes

Public Resources Code Section 21100(b)(2)(B) and Section 15126.2(c) of the CEQA Guidelines require that an EIR analyze the extent to which the proposed project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations would not be able to reverse. Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;

- The Project would involve a large commitment of nonrenewable resources;
- The Project involves uses in which irreversible damage could result from any potential environmental accidents associated with the Project; or
- The proposed consumption of resources is not justified (e.g., the Project involves the wasteful use of energy).

Construction and operation of the Build Alternatives, design options, and MSF site options would result in the use of nonrenewable resources, including fossil fuels; natural gas; water; and building materials, such as concrete. Construction activities would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels. However, the use of energy for construction activities would be consistent with other construction projects and would not substantially affect the availability of such resources. Operation of the Build Alternatives would also consume natural resources. However, the consumption of resources for operation would be consistent with other Metro LRT, would provide a regional transportation benefit, and would not represent a wasteful or unnecessary use of energy.

The Build Alternatives would result in irreversible environmental changes to existing natural resources, such as the commitment of energy and water resources as a result of operation and maintenance. However, as discussed in Section 3.5, Energy, and Section 3.16, Utilities and Service Systems, the amount and rate of consumption of these resources would not result in significant environmental impacts or result in the unnecessary, inefficient, or wasteful use of resources. The Build Alternatives, design options, and MSF site options are not anticipated to consume substantial amounts of energy or use other resources in a wasteful manner; therefore, impacts related to significant and irreversible environmental changes would be less than significant.

## 4.4 Potential Secondary Effects

CEQA Guidelines Section 15126.4(a)(1)(D) states that states that, "[i]f a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measures shall be discussed but in less detail than the significant effects of the project as proposed." As identified in Chapter 3, Environmental Analysis, mitigation measures would be implemented to reduce construction and/or operational impacts of the Project in areas of biological resources, cultural resources, geology, soils seismicity and paleontological resources, hazards and hazardous materials, hydrology and water quality, noise and vibration, transportation and traffic, and tribal cultural resources. The following presents an evaluation of the potential secondary effects that could occur as a result of implementation of the required mitigation measures. For the reasons stated below, it is concluded that the required mitigation measures would not result in significant secondary impacts.

### 4.4.1 Biological Resources

MM BIO-1 requires surveys to be conducted to ensure that bat species are not roosting within 100 feet of demolition work at bridges. MM BIO-2 requires surveys of inactive swallow nests within 100 feet of affected bridges to determine whether they are occupied by roosting bats. MM BIO-3 requires bat exclusion plan and measures to be developed if bats are roosting on or within 100 feet of affected bridges. MM BIO-4 requires a bird nesting survey within the project area, and if an active nest is

located, requires the implementation of no-work buffers around the nest. Conducting surveys and implementing bat exclusion measures requires vehicle use to transport personnel to the Project site. This is anticipated to consist of one or two round trip vehicle trips per survey. The vehicles would use existing roadways and staging locations to access the Project site and perform work. Thus, there would be no impact to transportation and no other secondary impacts would occur.

MM BIO-5 and MM BIO-6 require the cleaning of construction vehicles and equipment, including when moving vehicles and equipment from one construction area to another. Implementation of these mitigation measures would have a beneficial impact by minimizing the potential spread of invasive species and would not result in physical changes in the environment that could cause significant secondary impacts.

## 4.4.2 Cultural Resources

MM CUL-1 and MM CUL-4 ensure that Metro conducts pre-construction baseline surveys, implements building protection measures, and conducts a post-construction survey to ensure noise and vibration impacts to the Golden Gate Theater and Dal Rae Restaurant Sign do not occur. MM CUL-4 is only applicable to Alternative 1. Conducting surveys requires vehicle use to transport personnel to the Project site. This would only result in a small number of trips and personnel. The vehicles would use existing roadways and staging locations to access the Project site and perform work. Thus, there would be no impact to transportation and no other secondary impacts would occur.

MM CUL-2 and MM CUL-5 ensure that documentation for the Pacific Metals Company Building and Vail Field Industrial Addition (if required) are undertaken, following the guidelines of the National Park Service's Historic American Building Survey/Historic American Engineering Record/Historic American Landscape Survey (HABS/HAER/HALS) program. MM CUL-3 and CUL-6 require an interpretive program for the Pacific Metals Company Building and the Vail Field Industrial Addition (if required) be undertaken. MM CUL-2 and 3 only apply to Alternative 1 and 3 with the Commerce MSF, and MM CUL-5 and 6 apply to Alternatives 1, 2 and 3 with the Commerce MSF. MM CUL-8 requires a project-wide Cultural Resources Monitoring and Mitigation Plan (CRMMP). MM CUL-7 includes monitoring ground disturbance at the Battle of Rio San Gabriel site, which is applicable to Alternative 1 only. The CRMMP would specify required processes should potentially significant archeological or cultural resources be identified during earth-moving activities. MM CUL-9 identifies procedures required should human remains be discovered. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

## 4.4.3 Geology, Soils, Seismicity, and Paleontological Resources

MM GEO-1 through MM GEO-4 require a qualified paleontologist to monitor ground disturbing activity. The paleontologist would be equipped to salvage fossils and samples of sediment as they are unearthed, ensure that recovered specimens be prepared to a point of identification and permanent preservation, and that specimens shall be curated into a professional accredited museum repository. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

## 4.4.4 Hazards and Hazardous Materials

MM HAZ-1 requires Metro to hire a qualified environmental professional to conduct a Phase II Environmental Site Investigation before any substantial ground disturbance occurs on or near the properties with documented releases. MM HAZ-2, MM HAZ-4, and MM HAZ-5 require Metro to obtain permits and/or comply with appropriate regulatory agency standards to avoid hazardous waste releases, develop a soil and groundwater management plan, protect workers, and conduct hazardous building surveys and abatement prior to demolition of structures. MM HAZ 3 requires the contractor to create specifications relating to hazardous materials during excavating soil and groundwater. MM HAZ-1 through MM HAZ-5 are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

## 4.4.5 Hydrology and Water Quality

MM HWQ-1 would isolate construction in areas that do not occur in water when water is present in the Rio Hondo and spreading grounds or the San Gabriel River. Work area isolation could include use of a coffer dam, a by-pass channel, management of the water in the system by Los Angeles County Flood Control District (LACFCD), or other means to isolate the localized work area around the bridge columns. Because the isolated area would be localized around the bridge columns, any aquatic species present would be expected to readily move into other adjacent habitats. Therefore, work isolation would not interfere substantially with the movement of fish and wildlife species and impacts would be less than significant. This mitigation is discussed in more detail in Section 3.9, Hydrology and Water Quality, and Appendix J, Hydrology and Water Quality Impacts Report. There are no terrestrial wildlife corridors within the BRSA of Alternative 1, so there would be no impacts on terrestrial wildlife corridors. Implementation of MM HWQ-1, which includes isolating the work area if water is present in the Rio Hondo, Rio Hondo Spreading Grounds, or the San Gabriel River, has the potential to impact flood flows. However, the isolation method would be determined through an agreement between Metro and LACFCD and would only be used for a temporary amount of time. Thus, the use of an isolation method would have a less than significant impact on flood flows.

MM HWQ-2 requires Metro to construct compensatory mitigation for the potential loss of flood storage due to placement of LRT bridge piers or enhanced bridge supports in Los Angeles County Department of Public Works (LACDPW) flood control facilities within the impacted flood control facility based on the volume of the flood storage loss and hydraulic analysis. This mitigation measure, which would only apply to Alternative 1, would maintain the hydraulic profile of the existing floodplain and it would not result in significant secondary impacts on the environment.

## 4.4.6 Noise and Vibration

MM NOI-1 and NOI-15 would require Metro and/or Metro's contractor to create a construction noise control plan, construction noise monitoring plan, construction vibration control plan, and construction vibration monitoring plan. MM NOI-8 requires Metro to notify the public of construction operations and schedules and set up a Noise and Vibration Complaint Hotline. MM NOI-14 requires Metro to conduct a pre-construction survey of selected properties as a method of comparison for potential vibratory impacts on structures. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

MM NOI-3 requires Metro's contractor to erect temporary noise barriers between noisy activities and noise sensitive receptors. While the use of barriers could result in visual impacts, the barriers would only in be place while the noise generating activities could impact adjacent sensitive receptors and they would be removed when such activities are completed. Visual impacts of the barriers would be temporary in nature and are considered a less than significant secondary impact.

MM NOI-4, MM NOI-5, MM NOI-6, MM NOI-7, MM NOI-10, and MM NOI-11 involve specific construction-related measures to reduce noise levels at adjacent sensitive receptors. These measures are considered part of the construction phase of any transportation project and, thus, are included within the analysis contained in this Recirculated Draft EIR and would not result in additional significant secondary impacts.

MM NOI-12 and MM NOI-13 involve selection of track materials (track support systems which incorporate resilience and "gapless" spring frog or other low vibration switches). Selection of these materials would be installed on the guideway that is addressed in the analysis contained in this Recirculated Draft EIR and would have no significant secondary impacts

MM NOI-2 and MM NOI-9 establishes a preferred construction methodology for the removal of excavated spoils from the TBM (i.e., muck) and installation of piles at locations containing noise and vibration-sensitive receptors. MM NOI-9 requires Metro's contractor to use a muck removal conveyor in lieu of a rail-based muck wagon to reduce potential noise and vibration impacts. While conveyor systems require power to operate, use of this equipment would not be notably different than a rail-based muck wagon system and would not meaningfully change the evaluation of construction impacts addressed in this Recirculated Draft EIR and therefore MM NOI-9 would not have a significant secondary impact.

MM NOI-2 would require Metro's contractor to, where practicable, use cast-in-drilled-hole (CIDH) or drilled piles rather than impact pile drivers to reduce excessive noise around noise sensitive receptors. The use of CIDH piles in wet conditions may be infeasible in certain areas due to the presence of soft cohesive soils, loose sands, or boulders, or the presence of high groundwater pressure that would make it difficult to establish a differential water pressure head for slurry construction. In these cases, impact pile drivers may be necessary; in all other practicable cases, Metro would be required to use CIDH or drilled piles. Installation of CIDH and/or drilled piles is included the evaluation of construction impacts addressed in this Recirculated Draft EIR and therefore, MM NOI-2 would not have a significant secondary impact.

## 4.4.7 Transportation and Traffic

MM TRA-1 requires Metro to prepare a Traffic Management Plan as needed to facilitate the flow of traffic in and around construction zones. Implementation of this plan may result in temporary air quality and noise effects, as well as traffic impacts along the associated roadways during the construction phase of the Project. However, these impacts would be temporary and localized in nature. Thus, there would be less than significant secondary impacts.

# 4.4.8 Tribal Cultural Resources

MM TCR-1 requires all construction personnel involved in ground-disturbing activities to be provided with appropriate tribal cultural resources training. MM TCR-2 requires Metro to retain a Native American monitor for work at locations identified as sensitive during tribal consultation during ground disturbing activities during construction. MM TCR-3 requires a project-wide CRMMP that addresses areas where potentially significant prehistoric and historic archaeological deposits, and tribal cultural resources are likely to be located based on background research, a geoarchaeological analysis, and tribal consultation. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

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