

4. Other Environmental Considerations

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, growth-inducing effects, and significant irreversible environmental changes are discussed in the following sections. This chapter also summarizes significant and unavoidable impacts identified in Chapter 3.

4.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

Metro has determined that the Proposed Project would not have the potential to cause significant impacts related to the resource areas listed below. Similarly, there is no potential for the Proposed 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.

- Agriculture and Forestry Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations that are on surface streets. There would no potential for the above resources to be impacted on SR-134 segments, which includes B, E3, G1, and the portions of F1, F2, and F3 on the SR-134 in the City of Los Angeles.

4.1.1 Agriculture and Forestry Resources

Impact a) Would the Proposed Project 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?

No Impact. The Proposed Project is located in a densely developed urban area. The California Resources Agency does not identify any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the Study Area.¹ Due to its urban setting, the Project Area is not included in the Farmland Mapping and Monitoring Program of the California Department of Conservation.² Implementation of the Proposed Project would not result in the conversion of farmland to non-agricultural uses. No loss of farmland would result from the implementation of the Proposed Project. Therefore, no impact would occur during construction or operational activities.

Impact b) Would the Proposed Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. There are no identified agricultural resources in the Project Area, nor does the Project Area contain areas zoned for agricultural use. Los Angeles County does not participate in the Williamson Act program and the Project Area is not under a Williamson Act Contract.³ Therefore, no impact would occur during construction or operational activities.

Impact c) Would the Proposed Project 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))?

No Impact. The Proposed Project is located in a densely developed urban area. There are no areas of forest land as defined in PRC Section 12220(g) or timberland as defined in PRC Section 4526 within the Project area. Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Therefore, no impact would occur during construction or operational activities.

¹ California Department of Conservation, *California Important Farmland Finder*, <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed March 2020.

² California Department of Conservation, *Farmland Mapping & Monitoring Program*, <https://www.conservation.ca.gov/dlrp/fmmp>, accessed March 2020.

³ California Department of Conservation, *The Williamson Act of 2016-17*, https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf.

Impact d) Would the Proposed Project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Proposed Project is located in a densely developed urban area. There is no forest land identified within the Project Area. Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur during construction or operational activities.

Impact e) Would the Proposed Project 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?

No Impact. There is no farmland or forestland located in the Project Area. The Proposed Project would not change the existing environment in a manner that would result in the conversion of farmland or forestland to other kinds of land uses. Therefore, no impact would occur during construction or operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to agricultural resources. In addition, an existing cumulative impact to agricultural resources has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

4.1.2 Hazards and Hazardous Materials

The methodology used to identify potential impacts consisted of locating potentially hazardous sites or sites with hazardous materials and comparing their locations with the route of the proposed project. An analysis was completed to evaluate whether potential sources or indications of hazardous substance contamination are present in the areas of right-of-way and construction for the proposed project. The analysis included of a site visit and visual inspection of exterior of the project vicinity; a review of previous EIRs, project background, and available agency records; and a computer database government record search of hazardous waste sites within one-mile band along a corridor defining the project limits. The Hazards and Hazardous Materials Technical Report is included as Appendix J to the Draft EIR.

The potential for the Proposed Project to result in an impact to hazardous and hazardous materials is independent of the specific alignment and components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

Impact a) Would the Proposed Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction

Less-Than-Significant Impact. The Proposed Project would repurpose existing travel lanes and parking delineations with limited roadway reconstruction or widening. Construction would be generally limited to minor roadway modifications and bus stop amenities/improvements. Construction activities would involve the temporary use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids for on-site construction equipment. Environmental areas of concern were not readily identified during the site reconnaissance in construction areas. The following hazardous materials could be disturbed, excavated or removed, and transported on public roads and highways:

- Lead Based Paint/Yellow Paint Striping
- Aerially Deposited Lead in Soil
- Asbestos Containing Materials (ACMs)
- Herbicides
- Petroleum hydrocarbons associated with gas stations
- Polychlorinated Biphenyls
- Known, Potential, and Historical Concern Sites (impacted soil and/or groundwater)
- Residual soil impacts associated with historical gas station contamination

The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. For example, the SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. The SCAQMD also regulates volatile organic compound emissions from contaminated soil through Rule 1166. Therefore, the Proposed Project would result in a less-than-significant impact related to construction activities.

Operation

Less-Than-Significant Impact. Vehicle maintenance activities would require the use of detergents and cleansers. The potential for exposure to these hazards and hazardous materials would be limited to the existing Metro facilities. Metro facilities are staffed with personnel trained in hazardous materials emergencies. Metro staff is available 24-hours a day through the Quality Assurance Department to respond to hazardous materials releases, and Metro sites frequently undergo emergency response drills. There would be no hazardous emissions associated with operations of the Proposed Project. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

Impact b) Would the Proposed Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

Less-Than-Significant Impact. Construction activities would not involve the use of significantly hazardous materials. Excavation work associated with utility relocations and station platform construction would be unlikely to result in the accidental release of methane, oil, gas, or other subsurface hazardous materials. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. Construction vehicles would use diesel fuel, although the accidental release of construction fuel would not significantly endanger the public or the environment through reasonably foreseeable upset or accident conditions. Therefore, the Proposed Project would result in a less-than-significant impact related to construction activities.

Operation

Less-Than-Significant Impact. Operational activities would not involve the use of significantly hazardous materials. Vehicle maintenance activities would require the use of detergents and cleansers. These are not hazardous materials that could endanger the public or the environment through reasonably foreseeable upset and accident conditions. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

Impact c) Would the Proposed Project be reasonably anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction

Less-Than-Significant Impact. Potentially hazardous surface and subsurface materials, including ACM, lead based paint, and aerial deposited lead, could be released during project construction resulting in a health or safety hazard to students or school employees. There are many schools located within one-quarter mile of the 18-miles alignment. Construction activities would involve minimal ground disturbance and excavation. Construction would be unlikely to result in the accidental release of methane, oil, gas, or other subsurface hazardous materials. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. For example, the SCAQMD regulates asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. The SCAQMD also regulates volatile organic compound emissions from contaminated soil through Rule 1166. Therefore, it is not reasonably anticipated that the Proposed Project would emit hazardous air emissions, or handle an extremely hazardous substance or a mixture containing an extremely hazardous substance within one-quarter mile of a school. As such, the Proposed Project would result in a less-than-significant impact related to construction activities.

Operation

Less-Than-Significant Impact. Vehicle maintenance activities would require the use of detergents and cleansers. The potential for exposure to these hazards and hazardous materials would be limited to the existing Metro facilities. Metro facilities are staffed with personnel trained in hazardous materials emergencies. Metro staff is available 24-hours a day through the Quality Assurance Department to respond to hazardous materials releases, and Metro sites frequently undergo emergency response drills. There would be no hazardous emissions associated with operations of the Proposed Project. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

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

Construction

Less-Than-Significant Impact. Database searches revealed 469 environmental concern sites within one mile of the Proposed Project route, including 115 permitted underground storage tanks, 331 cleanup sites, and 23 sites of historical concerns. This includes two sites in the Cortese database of hazardous sites maintained by the Department of Toxic Substances Control. It is not anticipated that any of the environmental concern sites would be disturbed by construction activities. Construction activities would involve minimal ground disturbance and excavation. Construction activities could result in the discovery of unanticipated contamination at known release sites, potential environmental concern sites, or historical environmental concern sites. The handling, transport, and disposal of all hazardous materials encountered during construction would be done according to federal, State, and local regulations. As previously discussed, the SCAQMD regulates disposal of asbestos (Rule 1403) and contaminated soils (Rule 1166). Therefore, the Proposed Project would result in a less-than-significant impact related to construction activities.

Operation

Less-Than-Significant Impact. The Proposed Project would repurpose existing travel lanes and would not operate on an existing hazardous materials site pursuant to Government Code Section 65962.5. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

Impact e) Would the Proposed Project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Construction

No Impact. Construction workers active in the North Hollywood portion of the Proposed Project would be located approximately 1.9 miles south of the Hollywood Burbank Airport. No component of the Proposed Project would be located within the associated Airport Land Use Plan. In addition, the Proposed Project would be approximately 0.8 miles outside of the Airport Influence Area and would not be subjected to substantial noise levels from the Hollywood Burbank Airport. Construction activities would not interfere with the operation of the airport, nor would they result in a safety hazard or excessive noise for people residing or working in the Project Area. Therefore, no impact would occur related to construction activities.

Operation

No Impact. The Proposed Project does not include a residential component or any other element that would directly result in additional residents in the Project Area. Operational activities would not expose additional residents to safety hazards or excess noises within the Project Area. The Proposed Project would create employment opportunities for bus system operations, maintenance, and administration. None of these jobs would be adversely affected by the activities of the Hollywood Burbank Airport. Therefore, no impact would occur related to operational activities.

Impact f) Would the Proposed Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction

Less-Than-Significant Impact. The Proposed Project would be constructed along or near several emergency/disaster routes, including the SR-134 Freeway, Colorado Boulevard, Glenoaks Boulevard, Olive Avenue, and Lankershim Boulevard.⁴ Los Angeles County and each of the cities affected by the Proposed Project have developed emergency response plans. Temporary lane closures may be required, and emergency routes may be temporarily disrupted during construction activities. The Project Area is a fully built roadway network with parallel streets in every direction. Detour routes, of which there are multiple options, would be established in consultation with emergency service providers. Although lane closures are anticipated, full street closures are not anticipated and roadway access would be maintained to accommodate emergencies. Construction activities would not impede public access to emergency/disaster routes and would not interfere with an adopted emergency response plan or

⁴ LA County Department of Water and Power, *Disaster Route Maps (by City)*, <https://dpw.lacounty.gov/dsg/DisasterRoutes/city.cfm>, accessed April 2020.

emergency evacuation plan. Therefore, the Proposed Project would result in a less-than-significant impact related to construction activities.

Operation

Less-Than-Significant Impact. The Proposed Project would operate on existing roadways and would not affect the ability of emergency routes to serve the Project Area in the event of an emergency or disaster. Bus-only lanes would be open to emergency vehicles, which could improve response plans. During emergencies, the bus-only lanes would be open to all evacuating vehicles. Operational activities would not impede public access to emergency/disaster routes and would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

Impact g) Would the Proposed Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Construction

Less-Than-Significant Impact. The Cities of Los Angeles, Burbank, Glendale, and Pasadena are Very High Fire Hazard Severity Zone according to the California Department of Forestry and Fire Protection database. However, the Project Area is also highly urbanized and well protected by existing emergency response. In the event of a wildland fire outbreak during the construction phase of the Proposed Project, the construction manager would comply with the emergency response procedures of the local fire and police departments to ensure the safe evacuation of on-site workers and to ensure that construction staging would not interfere with emergency services. While construction of the stations and roadway modifications would install non-residential structures in areas prone to wildfires, these structures would not result in impacts to wildland fires, nor would they exacerbate risk of loss, injury, or death involving wildland fires. Therefore, the Proposed Project would result in less-than-significant impact related to construction activities.

Operation

Less-Than-Significant Impact. The Proposed Project would operate on existing roadways and in a highly developed urbanized area that is adequately served by fire emergency services. In the event of a wildland fire outbreak during operation of the Proposed Project, bus operators would comply with local fire and police department emergency procedures to ensure that riders and operators are safely evacuated. In addition, there are already substantial numbers of people residing and working in the Project Area who are exposed to fire risks and the Proposed Project would not worsen or otherwise exacerbate these risks. Therefore, the Proposed Project would result in less-than-significant impact related to operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to hazards or hazardous materials. In addition, an existing cumulative impact to utilities has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

4.1.3 Hydrology and Water Quality

The following analysis is included in the Water Resources and Hydrology Technical Report (Appendix T). Refer to that document for detailed discussion of applicable regulations and the existing setting. The potential for the Proposed Project to result in an impact to hydrology and water resources is independent of the specific alignment and Project components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

Impact a) Would the Proposed Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Construction

Less-Than-Significant Impact. Construction would include paving, striping, and reconstruction of sidewalks, which would result in an increase in surface water pollutants such as sediment, oil and grease, and miscellaneous wastes. Water quality would be temporarily affected if disturbed sediments were discharged via existing stormwater collection systems. Increased turbidity and other pollutants resulting from construction-related discharges can ultimately introduce compounds toxic to aquatic organisms, increase water temperature, and stimulate the growth of algae.

The delivery, handling, and storage of construction materials and wastes, along with use of construction equipment, could also introduce the risk of stormwater contamination. Staging areas or building sites can be sources of pollution because of the storage and use of paints, solvents, cleaning agents, and concrete during construction. Larger pollutants, such as trash, debris, and organic matter, are additional pollutants that could be associated with construction activities.

Because construction activities would disturb more than one acre, preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) would be required, in accordance with the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction Activity (Order No. 2009-0009-DWQ, NPDES No. CAR000002) (Construction General Permit). The SWPPP would list Best Management Practices (BMPs) that would be implemented to protect stormwater runoff and include monitoring of the BMPs effectiveness.

The SWPPP would specify BMPs to ensure that water quality standards or waste discharge requirements are not violated. BMPs selected would be designed to comply with the requirements of the Regional Water Quality Control Board (RWQCB) and may be subject to

review and approval by each city. BMPs during construction may include, but not be limited to, the following:

- Silt fences
- Fiber rolls
- Street sweeping and vacuuming
- Stockpile management
- Vehicle and equipment maintenance
- Erosion control mats and spray-on applications
- Desilting basins
- Gravel bag berms
- Sandbag barriers
- Spill prevention and control
- Concrete waste management
- Water conservation practices

Such measures are routinely developed for construction sites and are proven to be effective in reducing pollutant discharges from construction activities. Implementation of the SWPPP during construction would ensure that water quality objectives, standards, and wastewater discharge thresholds would not be violated. The SWPPP would be prepared by the construction contractor and approved by each city prior to commencement of construction activities (i.e., approval of grading plans). The Proposed Project would not violate any water quality standards or waste discharge requirements. Therefore, the Proposed Project would result in a less-than-significant impact related to construction activities.

Operations

Less-Than-Significant Impact. The Proposed Project would result in a negligible change in impervious area and there would be no major sources of new pollutants. Because the Study Area is currently a transportation corridor, the water runoff from roadway surfaces would contain the same types of pollutants as expected under existing conditions. However, enhanced bus frequencies could result in small increases in potential pollutants from bus operations. Typical water quality pollutants associated with transportation corridors include: fallout from air pollution (e.g., nitrous oxides, hydrocarbons, lead, particulates), heavy metals from brake pads, oils, greases, and other vehicle lubricants. Because the project would replace 5,000 square feet or more of impervious surface area on an already developed site, per the County's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, as part of the stormwater program, SUSMP and Site-Specific Stormwater Mitigation Plans must be incorporated into the Project. Compliance with these regulations would require the inclusion of post-construction stormwater measures and low-impact development measures designed to minimize runoff flows and water quality degradation. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

Impact b) Would the Proposed Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Construction

No Impact. Existing utilities that would interfere with construction of the corridor improvements would be removed and relocated for continuing service. It is unlikely that groundwater would be encountered during construction because minimal ground disturbance is necessary for the surface-based BRT. It is unlikely that shallow excavation for utility improvements would result in contact with groundwater. Should dewatering be necessary, a General Dewatering Permit would be obtained from the RWQCB. Residual contaminated groundwater could be encountered during dewatering activities. Groundwater extracted during dewatering activities would either be treated prior to discharge or disposed of at a wastewater treatment facility. Local groundwater is one of several sources of regional water supplies. If groundwater is used during construction (e.g., dust control or concrete pouring), the amount would be minimal and temporary, and therefore would not result in substantial depletion of groundwater supplies. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The existing area that would be occupied by the Proposed Project facilities is primarily impervious and does not contribute substantially to groundwater recharge. The Proposed Project would result in a negligible change to impervious surface area. It is not anticipated that operations would require new water use at Metro facilities. Therefore, no impact would occur related to operational activities.

Impact c) Would the Proposed Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- (i) result in substantial erosion or siltation on- or off-site;
- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction

No Impact. Construction activities, such as grading and excavation, could result in increased erosion. Minor modifications to street storm drains could be required for median-running and curb-running treatments. However, these modifications would not include culvert widening or conversion of open channels to closed conduits and drainage patterns would remain approximately the same as existing conditions. Additionally, construction would not alter the course of any streams or rivers. A SWPPP would be prepared prior to starting construction. The Proposed Project would not alter the course of any water bodies and urban runoff would be

collected by the existing stormwater drainage system. As previously discussed, the SWPPP would control and minimize erosion and siltation. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project is located in a highly urbanized area and the existing right-of-way is impermeable. The Proposed Project would maintain viable drainage patterns currently existing at the Project site. Operation of the Proposed Project will not use water, so the operations will not impact erosion, flooding, or the stormwater drainage system. In addition, a SWPPP would be prepared prior to starting construction. The Project would not alter the course of any water bodies and urban runoff would be collected by the existing stormwater drainage system. Refer to Subsection 4.1.11(c) for additional storm drain details.

New stations would be constructed mainly on existing developed or paved surfaces already having a high amount of runoff. Water quality impacts to nearby channels and surface water features associated with operation of the project alternatives will be minor or negligible. The watersheds within the San Fernando and San Gabriel Valleys are primarily urban, and the net area of new impervious area as a result of the Proposed Project will be minor. Locally, the change in total runoff from the proposed (post-project) condition as compared to the existing (pre-project) condition is thus minor. Across the watershed, the net change in runoff volume due to this project will be negligible. Locally, the existing drainage pattern will be maintained in the proposed design to the maximum extent possible in order to minimize any changes to the flooding potential. Therefore, no impact would occur related to operational activities.

Impact d) Would the Proposed Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Construction

No Impact. The Proposed Project is not within the limits of a flood hazard, tsunami, or seiche zone. The potential for a catastrophic seiche event at the Devil's Gate Dam is low. The West Olive Avenue bridge crosses over the Western Burbank Channel and Federal Emergency Management Agency (FEMA) Zone AE. The existing bridge is elevated above the base flood elevations, so it is not expected to have significant risk of a 100-year flood. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project is not within the limits of a flood hazard, tsunami, or seiche zone. The potential for a catastrophic seiche event at the Devil's Gate Dam is low. The Proposed Project crosses through the Special Flood Hazard Area at a single location along its alignment; the West Olive Avenue bridge crosses over the Western Burbank Channel and FEMA Zone AE. The existing bridge is elevated above the base flood elevations, so it is not expected to have any significant risk of a 100-year flood. Therefore, no impact would occur related to operational activities.

Impact e) Would the Proposed Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Construction

No Impact. Construction activities would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The Proposed Project would implement a SWPPP and several BMPs to control run-off during construction activities. The Proposed Project would use water during construction activities (e.g., for dust control). This short-term use would require minimal water supplies. Construction-related water use would not necessitate new water deliveries to the region. If groundwater is used during construction (e.g., dust control or concrete pouring), the amount would be minimal and temporary, and therefore would not result in substantial depletion of groundwater supplies. The Proposed Project would not conflict with the management of groundwater basins. Therefore, no impact would occur related to construction activities.

Operations

No Impact. Operational activities of the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Operation of the Proposed Project will not use water, so it will not deplete or interfere with the management of the groundwater basin. The Proposed Project would result in a negligible change in impervious area and there would be no major sources of new pollutants. Because the project area is currently a transportation corridor, the water runoff from roadway surfaces would contain the same types of pollutants as expected under existing conditions. However, enhanced bus frequencies could result in small increases in potential pollutants from bus operations. Typical water quality pollutants associated with transportation corridors include heavy metals from brake pads, oils, greases, and other vehicle lubricants. Per the County's SUSMP requirements as part of the stormwater program, Site-Specific Stormwater Mitigation Plans must be incorporated into the Project. This would ensure consistency with water quality control plans and that the Proposed Project would not conflict with the management of groundwater basins. Therefore, no impact would occur related to operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to hydrology and water quality. In addition, an existing cumulative impact to water resources and hydrology has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

4.1.4 Land Use and Planning

The following analysis is included in the Land Use and Planning Technical Report (Appendix L). Refer to that document for detailed discussion of applicable regulations and the existing setting. The potential for the Proposed Project to result in an impact to land use and planning is

independent of the specific alignment and Project components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

Impact a) Would the Proposed Project physically divide an established community?

Construction

Less-Than-Significant Impact. Construction activities would require temporary road, lane, and sidewalk closures, which would reduce pedestrian and vehicle mobility and access within and between local communities throughout the Project Area. These closures would be temporary and are not expected to substantially divide or diminish access to existing communities or neighborhoods. The ability for cars and pedestrians to travel from one area of a community to another would be maintained by standard Metro construction policies, such as traffic management and construction staging plans. Therefore, the Proposed Project would result in a less-than-significant impact related to construction activities.

Operations

Less-Than-Significant Impact. The Proposed Project would operate entirely within existing transportation corridors and would not cause a change in land uses. Although there would be some turn restrictions and pedestrian crossing restrictions depending on the bus lane configuration, the Proposed Project would not physically divide an established community. Specific project components are discussed below.

Center-running bus lanes would operate within the median of the roadway. Crossing and left-turning traffic would be allowed at major intersections. To maintain access to adjacent properties, vehicles would be able to make left turns at major intersections. In addition, pedestrian access would be maintained or provided via crosswalks at signalized intersections.

Median-running bus lanes would operate in the inside travel lane adjacent to a raised median. Openings for cross-street traffic would be provided at major intersections where signalized left-turn bays are provided to the outside of the bus lanes to control conflicts between left-turning vehicles and buses. In addition, pedestrian access would be maintained or provided via crosswalks at signalized intersections.

Side-running busses would operate in the outside travel lane adjacent to midblock parking and/or bike lanes. Approaching intersections, right-turning vehicles either merge with the bus lane adjacent to the curb or where a dedicated right-turn bay is provided, right-turning vehicles weave across the bus lane into the right-turn pocket. The sidewalk area would accommodate station features while maintaining pedestrian circulation and access to adjacent parcels.

Curb-running busses operate in the outside lane adjacent to the curb. Approaching intersections, right-turning vehicles merge with the bus lane, so the bus lane is shared with right-turns at intersections. The sidewalk area would accommodate station features while maintaining pedestrian circulation and access to adjacent parcels.

Mixed-flow buses would utilize existing traffic lanes shared with general-purpose traffic. Vehicle and pedestrian access to adjacent parcels would be maintained.

By providing improved bus transit service, the Proposed Project would increase mobility and connectivity within the Proposed Project corridor. There is no component that would permanently physically divide an established community. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

Impact b) Would the Proposed Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Proposed Project adopted for the purpose of avoiding or mitigating an environmental effect?

Construction

Less-Than-Significant Impact. Construction activities would be conducted in compliance with local land use plans and codes. It is anticipated that construction activities would take place between the hours of 7:00 a.m. and 9:00 p.m. on weekdays and 8:00 a.m. and 6:00 p.m. on Saturdays within the City of Los Angeles, in accordance with the Los Angeles Municipal Code. Within the City of Burbank, City of Glendale, and City of Pasadena, in accordance with the City Codes construction would typically occur between 7:00 a.m. and 7:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays. Nighttime activities are not anticipated to be needed to construct the Proposed Project. However, at this stage of the planning process and without a construction contractor, it cannot be confirmed if nighttime construction would be necessary for specialized construction tasks. Please refer to the Section 3.9 Noise of the Draft EIR for the nighttime construction noise analysis. Should nighttime construction be necessary, the construction contractor would be required to coordinate with the jurisdictions to obtain necessary permits, such as a variance to the Noise Ordinance in the City of Los Angeles. The Proposed Project would not conflict with local land use plans. Therefore, the Proposed Project would result in a less-than-significant impact related to construction activities.

Operations

Less-Than-Significant Impact. The Proposed Project is a transportation project that would operate entirely within existing transportation corridors and would not impact land uses, as no acquisitions or other changes in existing land use are anticipated. While there would be some modifications to the corridor (e.g., changes in bicycle lanes, on-street parking, and turning movements), the Proposed Project corridor is an existing transportation route with ongoing bus service, and therefore, the Proposed Project operations would be compatible with existing land uses. This Proposed Project would be consistent with SCAG regional goals which focus upon land use and growth patterns that encourage transit and non-motorized transportation use by focusing growth along major transportation corridors in the region.

The City of Los Angeles is preparing the G (Orange) Transit Neighborhood Plan, which includes the North Hollywood BRT station. The Transit Neighborhood Plan is part of the City of Los Angeles Transit Neighborhood Plans initiative, which encourages livable communities and employment centers around the region's expanding transit network. The Los Angeles

Department of City Planning is focusing land use planning around transit to create complete neighborhoods. Planning regulations adjacent to transit neighborhoods typically encourage building design and a mix of uses that foster transit use. This pattern of development is intended to expand mobility options for greater numbers of people; improve the livability of the City; reduce vehicle-miles travelled and related greenhouse gas emissions consistent with regional and state policies; reinforce neighborhood character and identity; and generate greater economic opportunity for all residents. Although not available for public review, is anticipated that the Proposed Project would be consistent with the G (Orange) Transit Neighborhood Plan.

The Proposed Project could indirectly affect development in the Project Area by focusing growth in housing, employment, and commercial development within walking distance of the proposed transit stations along the project corridor. This development pattern would be consistent with regional goals.

The local land use plans for the jurisdictions along the project corridor include several goals and policies centered around establishing transit centers, maximizing transit service, accommodating future traffic demands, reducing reliance on the automobile, decreasing congestion, minimizing environmental impacts, increasing transit ridership, and developing compact pedestrian-oriented, mixed-use neighborhoods with accommodations for bicyclists. The Proposed Project would be consistent with or supportive of many of the goals and policies of the applicable jurisdictions along the corridor. The Proposed Project would not conflict with local land use plans. Therefore, the Proposed Project would result in a less-than-significant impact related to operational activities.

Cumulative Impacts

Refer to Chapter 5.0, Cumulative Impacts for a discussion of potential cumulative impacts related to land use.

4.1.5 Mineral Resources

The following analysis is included in the Mineral Resources Technical Report (Appendix M). Refer to that document for detailed discussion of applicable regulations and the existing setting. The potential for the Proposed Project to result in an impact to mineral resources is independent of the specific alignment and Project components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

Impact a) Would the Proposed Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Construction

No Impact. Construction activities may result in ground disturbance related to roadway reconstruction and installation of Proposed Project components, including transit stations. Ground disturbing activities would be shallow and typically limited to within a few feet of the surface. Existing land uses and development do not allow for the extraction of mineral

resources, and resource recovery does not occur within the Project corridor. Although there is a possibility that significant mineral resources could be located within certain areas, mining would not be feasible. For example, the mineral resource zone along the Arroyo Seco canyon is currently developed with the SR-134, and the Proposed Project would not disturb land along this portion of the alignment. The mineral resource zone in the North Hollywood community in the City of Los Angeles is heavily urbanized and the Proposed Project would not interfere with a mineral resource at this location. Construction activities would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Therefore, no impact would occur related to construction activities.

Operations

No Impact. Operational activities would not result in the extraction of sand, gravel, or oil resources or further preclude the extraction of such resources and would not introduce new oil districts or oil producing uses. Operational activities would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Therefore, no impact would occur related to operational activities.

Impact b) Would the Proposed Project 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?

Construction

No Impact. No mineral resource recovery sites have been identified in the Project Area. Construction activities would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Therefore, no impact would occur related to construction activities.

Operations

No Impact. Operational activities would not result in the extraction of sand, gravel, or oil resources or further preclude the extraction of such resources and would not introduce new oil districts or oil producing uses. Operational activities would not result in the loss of availability of a mineral resource recovery site delineated on a local general plan, specific land or other land use plan. Therefore, no impact would occur related to operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to mineral resources. In addition, an existing cumulative impact to mineral resources has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

4.1.6 Population and Housing

The following analysis is included in the Population and Housing Technical Report (Appendix Q). Refer to that document for detailed discussion of applicable regulations and the existing setting. The potential for the Proposed Project to result in an impact to population and housing is independent of the specific alignment and Project components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

Impact a) Would the Proposed Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Construction

No Impact. The Proposed Project would be constructed within the curb lanes of an existing roadway and would not result in the displacement of any existing housing units. The Proposed Project would not require any right-of-way acquisitions that would impact existing housing. In addition, the Proposed Project would not require the construction or expansion of a maintenance and storage facility. As a result, no housing displacement would result from the Proposed Project. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project would not require the acquisition of residential properties or the displacement of existing housing units. Operation and maintenance activities would be focused on physical improvements including the BRT route and stations/platforms which would also not require the displacement of any housing units. Accordingly, no housing displacement impacts would occur as result of the Proposed Project. Therefore, no impact would occur related to operational activities.

Impact b) Would the Proposed Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Construction

No Impact. The Proposed Project would be constructed within the curb lanes of an existing roadway and would not result in the displacement of any people or businesses. The Proposed Project would not require any right-of-way acquisitions for the proposed routes or stations/platforms that would necessitate construction of replacement housing or relocation of existing businesses. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project would not displace any people or businesses since the proposed transportation facilities would operate entirely within the existing transportation ROW. No physical barriers would be introduced that would displace people or businesses. Therefore, no impact would occur related to operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to population or housing. In addition, an existing cumulative impact to population or housing has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

4.1.7 Public Services

The following analysis is included in the Public Services Technical Report (Appendix R). Refer to that document for detailed discussion of applicable regulations and the existing setting. The potential for the Proposed Project to result in an impact to public services is independent of the specific alignment and Project components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

Impact a) For fire protection, would the Proposed Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Construction

No Impact. Construction would not result in increased demand for fire protection services due to changes to the existing population in the region. Construction jobs are temporary in nature and the employment opportunities resulting from construction are not anticipated to result in population growth. A substantial employment base and residential population currently exist in the Cities of Los Angeles, Burbank, Glendale and Pasadena and within commuting distance of the corridor. Accordingly, employment opportunities to support construction of the Proposed Project would not be expected to result in a substantial migration of additional residents or otherwise induce substantial population growth in communities and neighborhoods such that new fire protection facilities would be required to serve the area.

The Proposed Project would require temporary sidewalk, lane, and road closures, to construct stations, restripe roadways, and reconfigure existing curbs. Emergency vehicle access may be impeded during construction. Lane and/or road closures would be scheduled to minimize disruptions. The nearest local fire responders would be notified, as appropriate, of traffic control plans during construction to coordinate emergency response routing. There would be no need for new or physically altered fire protection facilities. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project would not include the development of new housing or businesses that would directly induce population growth. While the Proposed Project would generate additional employment opportunities for bus drivers and maintenance personnel, the

number of jobs would be relatively few, and a substantial employment base and residential population currently exist within the region to meet the future employment needs.

The Proposed Project would not require the physical acquisition, displacement, or relocation of fire protection facilities; therefore, there would be no need to replace or physically alter existing fire protection facilities. Conversion of existing mixed-flow lanes to dedicated BRT lanes could result in additional roadway congestion due to the decreased roadway capacity for mixed-flow traffic. This increased roadway congestion could reduce access for emergency vehicle response. However, with enhanced transit services, the Curb-Running BRT Alternative may result in higher transit ridership, which would reduce traffic congestion over the long-term operation of the project and facilitate faster response times for police and fire protection services. In addition, emergency vehicles would be allowed to utilize the dedicated bus lanes to respond to emergencies. Additionally, Project facilities would be designed in accordance with Metro Design Criteria including Fire/Life Safety Design Criteria. Accordingly, the Proposed Project is likely to improve emergency vehicle access. Therefore, no impact would occur related to operational activities.

Impact b) For police protection, would the Proposed Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Construction

No Impact. Construction would not result in increased demand for police services due to changes to the existing population in the region. Construction jobs are temporary in nature and the employment opportunities resulting from construction are not anticipated to result in population growth. A substantial employment base and residential population currently exist in the Cities of Los Angeles, Burbank, Glendale and Pasadena within commuting distance of the corridor. Accordingly, employment opportunities to support construction would not be expected to result in a substantial migration of additional residents to the region or otherwise induce substantial population growth in communities and neighborhoods such that new police protection facilities would be required to maintain acceptable service ratios and response times.

The Proposed Project would require temporary sidewalk, lane, and road closures, to construct stations, restripe roadways, and reconfigure existing curbs. Emergency vehicle access may be impeded during construction. Lane and/or road closures would be scheduled to minimize disruptions. The nearest local police responders would be notified, as appropriate, of traffic control plans during construction to coordinate emergency response routing. There would be no need for new or physically altered police protection facilities. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project would not include the development of new housing or businesses that would directly induce population growth. While the Proposed Project would generate additional employment opportunities for bus drivers and bus maintenance personnel, the number of jobs would be relatively few and a substantial employment base and residential population currently exist within the region to meet the future employment needs.

The Proposed Project would not require the physical acquisition, displacement, or relocation of police protection facilities; therefore, there would be no need to replace or physically alter existing police protection facilities. Conversion of existing mixed-flow lanes to dedicated BRT lanes could result in additional roadway congestion due to the decreased roadway capacity for mixed-flow traffic at certain locations. This increased roadway congestion would not reduce emergency vehicle response times because fire and police vehicles would be allowed to utilize the dedicated bus lanes to respond to emergencies. In addition, with enhanced transit services, the Proposed Project may result in higher transit ridership, which would reduce traffic congestion over the long-term operation of the project and facilitate faster response times for police and fire protection services. It is not anticipated that the provision of new bus stations and platforms would lead to an increase in police service calls or the local jurisdiction service ratio. Metro's transit policing strategy includes Transit Services Bureau officers and contracted police services dedicated to serving the Metro system, which includes the provision of the system expansion. BRT system riders would be subject to Metro guidelines and requirements pertaining to safety and crime prevention and all Metro facilities (e.g., bus stops and stations) would be designed in accordance with Metro Design Criteria including Fire/Life Safety Design Criteria including security lighting, open visibility, and security information. Design of each BRT station and development of operating plans would be coordinated with each local jurisdictions' fire and police service providers to ensure adequate emergency access and safety design. Accordingly, the Proposed Project is likely to improve emergency vehicle access. Therefore, no impact would occur related to operational activities.

Impact c) For schools, would the Proposed Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Construction

No Impact. Construction would not result in substantial changes to the existing population in the region as construction jobs are temporary and there is a substantial employment base and residential population in the region to fill any construction-related jobs resulting from the Proposed Project. Portions of the Pasadena City College parking lot may be inaccessible while the terminal station is under construction. If needed, temporary parking spaces would be made available to ensure adequate parking for City College staff and students; no physical alterations or construction of replacement parking facilities would be needed to address the temporary loss

of parking based on existing supply. In addition, it is common for Metro to schedule construction activities to minimize school disruption such as conducting the heaviest period of construction during summer months when fewer students are present. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project would not require the physical acquisition, displacement, or relocation of school facilities; therefore, there would be no need to replace or physically alter existing school facilities. The Project does not include residential or commercial uses that would result in an increase in demand for need for new school facilities. Metro and Pasadena City College are discussing a bus terminal on campus along with electric charging infrastructure. Pasadena City College is in the process of updating the Facilities Master Plan, which considers the potential for a bus terminal. Project-related improvements would be coordinated with Pasadena City College to avoid unplanned educational displacement. If the bus terminal on Pasadena City College's campus is constructed as part of the Proposed Project, it is not anticipated that Project facilities would displace or relocate classroom facilities. While the Project would not lead to increased demand for primary school facilities, the new transit service would improve access to Pasadena City College. The anticipated increase in demand for City College facilities is not anticipated to be substantial as the Proposed Project is unlikely to result in a substantial number of new students to the college, but rather an alternative transportation mode for commuting students. Therefore, no impact would occur related to operational activities.

Impact d) For parks, would the Proposed Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Construction

No Impact. The Proposed Project would not require the physical acquisition, displacement, or relocation of parks or other recreational facilities. Construction activities would likely require temporary sidewalk and lane closures, which could inhibit access to park facilities. Metro standard practices include timing closures to minimize disruptions. There would be no need for new, expanded, or temporary park facilities to meet existing demand for parkland. Additionally, construction would not increase use of the parks and recreational facilities or otherwise generate increased demand for such facilities through population growth as a result of construction job opportunities. Construction jobs are temporary in nature and the employment opportunities resulting from construction are not anticipated to result in population growth that would increase existing demand for park facilities. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project would be constructed and would operate within the existing transportation ROW and would not impact parks nor have long-term effects. The Proposed Project would not require the physical acquisition, displacement, or relocation of park facilities; therefore, there would be no need to replace or physically alter existing park facilities. The Project does not include residential or commercial uses that would result in a need for new parks and recreational facilities. Indirectly, the Project would increase access to parks and recreational facilities, which may result in increased usage of these facilities and the need for expansion or new construction. However, local residents are the primary users of parks and other recreational facilities within the corridor and the Project would not induce a substantial number of new visitors such that new or physically altered park facilities would be required to meet demand. Therefore, no impact would occur related to operational activities.

Impact e) For other public facilities, would the Proposed Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Construction

No Impact. Construction would not result in substantial changes to the existing population in the region as construction jobs are temporary and there is a substantial employment base and residential population in the region to fill any construction-related jobs resulting from the Proposed Project. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project would not require the physical acquisition, displacement, or relocation of libraries or other public facilities; therefore, there would be no need to replace or physically alter existing libraries or other public facilities. The Project does not include residential or commercial uses that would result in a need for new libraries or other public facilities. Indirectly, the Project would increase access to facilities, which may result in increased usage of these facilities and the need for expansion or new construction. However, local residents are the primary users of these facilities within the corridor and the Project would not induce a substantial number of new visitors such that new or physically altered parks, libraries or other public facilities would be required to meet demand. Therefore, no impact would occur related to operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to public services. In addition, an existing cumulative impact to public services has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

4.1.8 Recreation

The following analysis is included in the Parks and Other Recreational Facilities Technical Report (Appendix P). Refer to that document for detailed discussion of applicable regulations and the existing setting. The potential for the Proposed Project to result in an impact to parks and other recreational facilities is independent of the specific alignment and Project components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

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

Construction

No Impact. The Proposed Project would not require the physical acquisition, displacement, or relocation of parks or other recreational facilities during construction. Construction activities associated with the Proposed Project would result in temporary nuisances associated with noise, dust, odors, and traffic delays, which could affect the use and physical quality of adjacent parks and recreational facilities. Construction activities would likely require temporary sidewalk and lane closures, which could inhibit access to recreational facilities. Metro standard practices include timing closures to minimize disruptions. Additionally, construction of the Proposed Project would not increase use of the parks and recreational facilities through population growth as a result of construction job opportunities. Construction jobs are temporary in nature and the employment opportunities resulting from construction are not anticipated to result in population growth that would increase the use and physical deterioration of park and recreational facilities. Construction activities would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project does not include residential or commercial uses that would result in increased use of parks and recreational facilities, and therefore operational activities would not directly lead to the substantial physical deterioration of parks and recreational facilities. An indirect impact may occur because access to parks and other recreational facilities would be increased as a result of the Proposed Project. Local residents are the primary users of parks and other recreational facilities adjacent to the routes and it is not anticipated that the Proposed Project would induce a substantial number of new visitors to parks and recreational facilities. Furthermore, the Proposed Project is anticipated to primarily be used by daytime commuters who are unlikely to utilize parks and recreational facilities during the work week.

The Proposed Project may require additional Metro employees associated with more frequent bus service and additional buses for maintenance. The number of new jobs would be small, and a substantial employment base and residential population currently exists in the region. During operations, the Proposed Project is anticipated to increase the daytime bus commuters but is

not expected to result in substantial migration or substantial increase in the construction of residential projects.

Operational activities would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, no impact would occur related to construction activities.

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

Construction

No Impact. The Proposed Project does not include any recreational facilities, nor would it require the construction or expansion of recreational facilities. The Proposed Project would not include the construction of residential uses or approval of a tentative map or parcel map, which would require the construction of new recreational facilities in accordance with the Quimby Act of 2015. Construction workers are unlikely to utilize local parks and are more likely to utilize parks near their places of residence. Furthermore, construction jobs are temporary in nature and the employment opportunities resulting from construction are not anticipated to result in population growth that would necessitate the need for more recreational facilities. Construction activities would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project does not include residential or commercial uses that would result in increased use of parks and recreational facilities and the need for new parks and recreational facilities. Indirectly, the Proposed Project would increase access to parks and recreational facilities, which may result in increased usage of these facilities and the need for expansion or new construction. However, local residents are the primary users of parks and other recreational facilities within the corridor and it is not anticipated that the Proposed Project would induce a substantial number of new visitors to parks and recreational facilities. Furthermore, the Proposed Project is anticipated to primarily be used by daytime commuters who are unlikely to utilize parks and recreational facilities during the work week. As such, the Proposed Project would not result in the need for construction or expansion of recreational facilities which would have a physical effect on the environment. Operational activities would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, no impact would occur related to operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to recreation. In addition, an existing cumulative impact to recreation has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

4.1.9 Utilities and Service Systems

The following analysis is included in the Utilities and Service Systems Technical Report (Appendix S). Refer to that document for detailed discussion of applicable regulations and the existing setting. The potential for the Proposed Project to result in an impact to utilities and service systems is independent of the specific alignment and Project components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

Impact a) Would the Proposed Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Construction

No Impact. Utility companies have not been contacted at this time in the planning process. During Advanced Conceptual Engineering, the Project team would coordinate with utility companies to request information. These companies would be contacted to ensure they are aware of the Proposed Project and provide mark-ups, as-builts or confirmation of owner exhibits. A utility composite basemap would be developed to outline the utilities within the Project boundary. The basemap would be used to identify conflict locations with Proposed Project work and existing utility facilities. Each utility company would need to be contacted on a periodic basis to determine if there are any new plans for their facilities. The utility composite basemap would be updated as new information becomes available.

Utility coordination meetings would be set up with each utility company with potentially affected facilities to help determine if relocation would be required or the facility could be protected-in-place. The utility coordination meetings would help to ensure all the utility companies are engaged early during Project development. Preliminary relocation concepts would be developed and presented to each utility owner with affected facilities. Utility agreements would be finalized to ensure the designs are prepared by third party utility owners. An example of the utility notification letter can be found in the Utilities and Service Systems Technical Report (Appendix S).

Water Facilities. The Proposed Project would not include a new source of potable water consumption. Water appurtenances such as fire hydrants and water meters could be relocated and/or adjusted to accommodate project elements such as BRT stations. These facilities would be relocated in close proximity to existing facilities, typically within a few feet of existing locations. Relocations would require minimal ground disturbance and would be finished within a few days. Construction activities would not require the construction or relocation of water

facilities which could cause significant environmental effects. Therefore, no impact would occur related to construction activities.

Wastewater Treatment or Storm Water Drainage Facilities. Construction activities, such as earthwork, could result in increased erosion. In addition, the Proposed Project could require minor modifications to storm drains. Catch basins, manholes and to a certain extent laterals may be relocated and/or adjusted where conflicts exist. These modifications would not include culvert widening or conversion of open channels to closed conduits and drainage patterns would remain approximately the same as currently exists. Construction activities would not alter the course of any streams or rivers. Construction activities would not require the construction or relocation of wastewater treatment or storm water facilities which could cause significant environmental effects. Therefore, no impact would occur related to construction activities.

Electric Power Facilities. The Proposed Project would not require new or relocated distribution infrastructure such as transmission lines from power facilities and transformers. BRT station lighting and electric bus charging stations would receive power from existing electricity lines. Sidewalk light poles may need to be relocated at various locations, although the few feet of movement would not require new distribution infrastructure. Project-related buses would be electrically powered and no new infrastructure would be needed to provide electricity to the buses. The location of charging stations for electric buses would be analyzed and located where sufficient capacity is available. Typically, a transformer, conduit, and charging station are required. Space requirements should be accommodated depending on the current electrical charging technology and infrastructure available at the time of design and construction. Bus charging infrastructure is being constructed along the G Line (Orange) terminus at Metro North Hollywood Station and will be completed and available for use by this Project. The Proposed Project would not require the construction or relocation of electric power facilities which could cause significant environmental effects. Therefore, no impact would occur related to construction activities.

Natural Gas Facilities. The Proposed Project would not require new natural gas facilities. The majority of the Project would be constructed in the existing ROW and no natural gas facilities have been identified in the construction zone outside of the ROW. At this time, no natural gas lines have been identified that would require relocation. Therefore, construction activities would not require the construction or relocation of natural gas facilities which could cause significant environmental effects. Therefore, no impact would occur related to construction activities.

Telecommunication Facilities. The Proposed Project would not require new telecommunication facilities. The majority of the Project would be constructed in the existing right-of-way and no telecommunication facilities have been identified in the construction zone outside of the ROW. Therefore, no impact would occur related to construction activities.

Operations

No Impact. This potential impact relates to significant environmental effects associated with the construction or relocation of utilities. There is no nexus for assessing the potential for operational impacts. Therefore, no impact would occur related to operational activities.

Impact b) Would the Proposed Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Construction

No Impact. The Proposed Project would use water during construction activities (e.g., for dust control). This short-term use would require minimal water supplies when compared to regional water use associated with land use developments. Construction-related water use would not necessitate new water deliveries to the region. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project does not include a long-term, permanent source of water use. Therefore, no impact would occur related to operational activities.

Impact c) Would the Proposed Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Construction

No Impact. The Proposed Project would generate wastewater during construction through the use of temporary worker restrooms. The Proposed Project would utilize the existing construction worker pool in the Los Angeles County as opposed to importing new workers that would increase wastewater generation. In addition, wastewater generation would be negligible in relation to the size and capacity of the wastewater treatment system and would not overburden the system. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project does not include a source of wastewater. Restrooms would not be provided at BRT stations. Therefore, no impact would occur related to operational activities.

Impact d) Would the Proposed Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Construction

No Impact. The Proposed Project would require the removal of soil, asphalt and concrete to accommodate various construction activities, including station construction and curb cuts. The anticipated amount of construction debris has not been estimated at this time in the planning process, although minimal debris is anticipated from construction of the surface-running BRT primarily in the existing right-of-way. The construction contractor would comply with AB 939,

which requires a Solid Waste Diversion Program and diversion of at least 50 percent of the solid waste from landfills to recycling facilities. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project does not include a direct operational source of solid waste. Indirectly, solid waste would be generated by transit users. Stations would include waste bins that would be emptied at least one time per week. The solid waste from one waste bin at each station would have no potential to affect landfill capacity of solid waste reduction goals. Therefore, no impact would occur related to operational activities.

Impact e) Would the Proposed Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Construction

No Impact. The Proposed Project would be required to comply with all applicable federal, state, and local statutes and regulations pertaining to solid waste disposal. There is no element of construction activities that would be outside of compliance. Therefore, no impact would occur related to construction activities.

Operations

No Impact. The Proposed Project would be required to comply with all applicable federal, state, and local statutes and regulations pertaining to solid waste disposal. There is no element of operational activities that would be outside of compliance. Therefore, no impact would occur related to operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to utilities. In addition, an existing cumulative impact to utilities has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

4.1.10 Wildfire

The following Wildfire Impact Statements relate to projects located in or near State responsibility areas or 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 are 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 list of cities that are

considered Very High Fire Hazard Severity Zones (VHFHSZ).⁵ The Cities of Los Angeles, Glendale, Burbank, and Pasadena are all currently on the VHFHSZ list. Additionally, CAL FIRE maintains a database containing Fire Hazard Severity Zones, which identifies State Responsibility Area and Local Responsibility Area (LRA). 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 State Responsibility Areas and VHFHSZs. A search conducted found that the Project Area contains two LRAs and no State Responsibility Areas.

The potential for the Proposed Project to result in an impact from wildfires is independent of the specific alignment and Project components. The following impact conclusions are valid for the Proposed Project and all route variations, treatments, and configurations.

Impact a) Would the Proposed Project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Proposed Project would operate along or near several emergency/disaster routes, including the SR-134 Freeway, Colorado Boulevard, Glenoaks Boulevard, Olive Avenue, and Lankershim Boulevard.⁶ Los Angeles County and each of the cities affected by the Proposed Project have developed emergency response plans. The Proposed Project would not impede public access to emergency/disaster routes and would not interfere with an adopted emergency response plan or emergency evacuation plan, including the Los Angeles County Operational Area Emergency Response Plan. Operations would not affect emergency evacuation plans and would potentially provide a community benefit. Bus-only lanes would be open to emergency vehicles, which could improve response plans. During emergencies, the bus-only lanes would be open to all evacuating vehicles. The Project Area is a fully built roadway network with parallel streets in every direction. Detour routes, of which there are multiple options, would be established in consultation with emergency service providers. Although lane closures are anticipated, full street closures are not anticipated and roadway access would be maintained to accommodate emergencies. Therefore, no impact would occur related to construction or operational activities.

⁵ California Department of Forestry and Fire Protection, *Cities for which CAL FIRE has made recommendations on Very High Fire Hazard Severity Zones (VHFHSZ)*, <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>, accessed March 2020.

⁶ Los Angeles County Department of Public Works, *Disaster Route Maps*, <https://dpw.lacounty.gov/dsg/DisasterRoutes/city.cfm>, accessed March 2020.

Impact b) Would the Proposed Project 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?

No Impact. The Proposed Project does not include a land use development with occupants (e.g., residential or commercial developments). Buses are mobile vehicles that can maneuver to avoid rider and driver exposure to wildfire risk. There is no potential for the Proposed Project to expose people to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Therefore, no impact would occur related to construction or operational activities.

Impact c) Would the Proposed Project 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?

No Impact. The Proposed Project would not require the installation or maintenance of new infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities. Construction activities would include the installation of additional bus stations and bulb-outs that would likely require the slight relocation of some utilities. Such activities would occur in highly developed, urbanized areas and would not exacerbate fire risk and would not result in temporary or ongoing impacts to the environment. Therefore, no impact would occur related to construction or operational activities.

Impact d) Would the Proposed Project 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?

No Impact. The Proposed Project is located in a densely developed urban area that is not prone to wildfires. The topography of the Project Area is relatively flat, and the Proposed Project is not located in an area with known landslide activity.⁷ The roadways affected by the Proposed Project are also not known to be adjacent to post-fire slope instabilities. The proposed Project would not result in drainage changes or increased runoff in the Project Area. However, proximity to the Verdugo Mountains and San Rafael Hills creates the potential for the affected roadways to be exposed to post-fire flooding. Numerous debris basins are located at the foot of these mountains that would protect affected roadways from damage due to post-fire slope instability or debris flows. Therefore, no impact would occur related to construction or operational activities.

Cumulative Impacts

The Proposed Project would not result in significant impacts to wildfires. In addition, an existing cumulative impact to wildfires has not been identified in the EIR. There is no potential for the Proposed Project to contribute to a cumulative impact associated with Related Projects.

⁷ USGS, *U.S. Landslide Inventory*, <https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d>, accessed March 20, 2020.

4.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

No significant and unavoidable impacts have been identified in the Draft EIR.

4.3 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that the EIR consider growth-inducing impacts of the Proposed Project. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Projects that are growth-inducing are typically located in more isolated or underdeveloped areas because these areas are more likely to require the additional infrastructure (e.g., housing, roads, utilities, schools) to support any growth that would accompany the project. Generally, these impacts are considered significant if a project would directly or indirectly lead to substantial population or employment growth in the project area that would exceed growth projections and planned capacities, or otherwise lead to a degradation of environmental quality such as increased noise or air quality.

The Proposed Project would not construct new homes or new commercial land uses and therefore would not directly result in any growth. Transit infrastructure projects within urban areas generally do not result in substantial growth inducement because the areas being served do not have vacant land available for new development. Cities within the Project Area are established communities that have generally experienced relatively stable population and housing growth with a mix of gains and losses in employment depending on the national and regional economy. The Proposed Project would be located within a densely developed region and would not extend into previously undeveloped areas. Additional permanent employment opportunities in the form of bus drivers and bus maintenance personnel may occur under the Proposed Project. However, this potential increase would be relatively minor and would not result in a significant increase in population. Therefore, the Proposed Project would not directly induce substantial residential or employment population growth.

While the Project would not directly induce substantial growth in the sub-region, it would have the potential to indirectly influence growth by stimulating new transit-oriented development surrounding the proposed BRT stations. This growth may occur from the implementation of regional and local policies that encourage growth opportunities for transit-orientated development around new stations; intensification of land uses at potential station areas and along the corridor; alternatives to automobile travel; and the planning for residents, visitors, and employees within the vicinity of the areas. The Proposed Project would be consistent with the growth management goals of each of the affected cities by providing mobility improvements and connections to activity centers where local jurisdictions have planned for growth to be focused. For example, the existing Burbank Media District Specific Plan, Glendale Downtown Specific

Plan, and Pasadena Central District Specific Plan all seek to concentrate housing and employment growth in these districts due to their centralized locations and regional transit connectivity. Similarly, there are a number of regional and local plans and policies which encourage and incentivize development near transit stations, such as the City of Los Angeles' Affordable Housing Incentive Program (TOC Guidelines). Such programs incentivize development by providing density bonuses, allowances, and other benefits to developers to encourage development of compact communities surrounding transit stations.

There are a number of factors that influence growth related to transit improvements including: public policies to encourage development, station area demographics, high transit reliability and effective service and design, strong real estate market trends, assembly of parcels, and station area/neighborhood design. To the extent that the Project improves transit reliability and overall service in the region, it would incentivize some degree of development consistent with planning efforts to develop compact communities in centralized areas that are well served by transit. The North Hollywood and Pasadena portions of the Project Area are already well served by transit and have seen some degree of transit-oriented development surrounding the Metro B/G Line (Red/Orange) North Hollywood Station and the Pasadena L Line (Gold) Memorial Park Station; however, the other portions of the Project Area have not experienced the same degree of transit investment and related new development. As such, portions of the Cities of Burbank and Glendale as well as the Eagle Rock community of the City of Los Angeles may be subject to new development opportunities surrounding the proposed BRT stations by triggering development incentives associated with TOC policies and programs in the respective jurisdictions. With the implementation of the Proposed Project, the opportunities for such growth would be enhanced and facilitated while helping to reduce reliance on personal automobiles in the region. In this regard, the Proposed Project would not only support the growth management goals of the affected cities, but it would also help to reduce potential environmental impacts associated with foreseeable growth. Growth that may indirectly result from implementation of the Project would not be unplanned but rather would be consistent with local and regional planning efforts to manage growth. It is not anticipated that the level of development that could be stimulated by the Project would exceed any regional growth projections given the already densely developed condition of the Project Area. Potential growth inducement impacts associated with the Proposed Project is less than significant.

4.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(d) requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project should it be implemented. The CEQA Guideline state that uses of nonrenewable resources during the initial and continued phases of a project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with a project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Construction of the Build Alternatives would entail the one-time irreversible and irretrievable commitment of nonrenewable resources, such as energy (fossil fuels used for construction equipment) and construction materials (such as lumber, sand, gravel, metals, and water). Additionally, labor and natural resources would be used to produce construction materials. These materials are generally not retrievable. However, they are not in short supply and their use would not have an adverse effect upon continued availability of these resources. Any construction would also require a substantial onetime expenditure of both local and Federal funds, which are not retrievable. Land used to construct the proposed facilities is considered an irreversible commitment during the period the land is used. After construction is completed, land used for construction staging would be available for other uses. The Proposed Project would commit land at stations. Stations and aboveground elements would be located on sidewalks or medians adjacent to existing commercial, retail, and industrial uses and would not require a substantial land commitment. This commitment of long-term land resources is consistent with the policies of the jurisdictions in the Project Area to promote transit-oriented uses.

The consumption of nonrenewable resources related to Proposed Project includes water, petroleum products, and electricity. Water would be used to control fugitive dust emissions and clean buses. In addition, fossil fuels would be used for transporting workers and materials during construction, and electricity and/or natural gas fuel would be used for buses, stations, and worker vehicles for maintenance and operation during the life of the project. The consumption amount and rate of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of such resources, because they would increase transit use (which increases energy efficiency) and decrease automobile dependence (which uses fossil fuels).

Benefits from the Proposed Project would include improved mobility, transit accessibility, and energy and time savings. The resources commitment and consumption are considered appropriate because regional and local area residents and visitors would benefit from improved transit services, which, in turn, would result in an overall decrease in the irreversible and irretrievable commitment of nonrenewable resources. The Proposed Project would remove passenger cars from the regional roadway network, easing the increase in VMT and the usage of fossil fuels. As discussed within the Draft EIR, the Proposed Project would reduce regional VMT and reduce mobile source energy consumption. Therefore, the project can substantially decrease the irreversible and irretrievable commitment of resources.

Maintenance of the buses would primarily use household-type cleaning materials, such as detergents and cleansers. Oil, solvents, and other materials would be used for train maintenance in relatively small volumes and are not considered acutely hazardous materials according to the National Institute of Health. There is the potential for hazardous materials/waste spills to occur; however, the storage and disposal of hazardous materials/waste will be conducted in accordance with all federal and State requirements in order to prevent or manage hazards. In the unlikely event that a spill does occur, remediation would be conducted accordingly. Therefore, there would be minimal risk of irreversible damage caused by an environmental accident associated with hazardous or acutely hazardous materials.