

3.16 OTHER CEQA CONSIDERATIONS

This section addresses other CEQA considerations that are required as part of an EIR, including, growth inducing impacts, irreversible environmental changes, effects determined not to be significant as subjects to be discussed in a Draft EIR, as well as significant and unavoidable impacts of the Proposed Project and Options.

3.16-1 Growth Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires an EIR to address any growth-inducing impacts that would result from the Proposed Project and its Options should it be implemented. Specifically, Section 15126.2(e) states:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The analysis in this section focuses on whether the Proposed Project, Trench Option, and Hawthorne Option, would directly or indirectly induce economic, population, or housing growth. This includes increases in the population that may strain existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. For purposes of this analysis, the Proposed Project and its Options are considered to have the same impacts, as they would require a similar number of workers and would occur within the same cities, by which future growth would be contemplated by the respective city where such growth would occur. Therefore, throughout this section, the Proposed Project refers to the Proposed Project and its Options as a whole.

Construction of the Proposed Project would create temporary construction-related jobs. However, the work requirements of most transportation construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. The Proposed Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. The Construction Careers Policy and the Project Labor Agreement were approved by the Metro Board on January 26, 2012, subsequently renewed on January 26, 2017, to encourage construction employment and training opportunities to those who reside in economically disadvantaged areas on Metro construction projects. In addition, the Proposed Project-related construction workers would not be anticipated to relocate their households; permanent places of residence as a consequence of working on the Proposed Project and, therefore, no new permanent residents are expected to be generated during construction of the Proposed Project. Additionally, the number of jobs created by the Proposed Project is anticipated in the planned growth within the Southern California Association of Government's (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Accordingly, construction of the Proposed Project and Options would not induce substantial population growth or result in substantial use of existing community service facilities.

City and county governments regulate population growth and economic development through zoning, land use plans, policies, and decisions on specific development proposals. Similarly, cities and utility companies base their capital improvement projects and future demand on local and regional population and employment projections. Typically, growth-inducing potential of a project would be considered significant if it stimulates human population growth or a population concentration above what is assumed in local and regional land use plans, or in projections made by regional planning authorities. Significant growth potential could also occur if the project provides infrastructure or service capacity to accommodate growth levels beyond those planned by local or regional plans and policies.

The Proposed Project is a transit project aimed at improving transit services and increasing intermodal connectivity. As discussed later in Section 3.16-2, Effects Found Not to be Significant, the Proposed Project does not propose construction of any new residential units or businesses, and therefore would not result in direct impacts associated with population growth. In addition, 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 following section further illustrates that the Proposed Project would have no significant project-induced growth and development.

The Proposed Project is designed to serve the current and planned growth in population, housing, and employment along the study corridor and to support the development of a multi-modal corridor consistent with local planning goals. The Proposed Project is centrally located in a major transportation corridor that connects with several other transit services, including Metro, Beach Cities Transit, Gardena Transit, Los Angeles Department of Transportation, and Torrance Transit. The current regional transportation plan (the 2020-2045 RTP/SCS) approved by SCAG identifies long-range transportation planning efforts and models anticipated regional housing, jobs, and land use projections for the South Bay region. The projections from these models help regional and local jurisdictions with their long-range planning effort mandated by federal and state regulations, one of which is the RTP/SCS. As shown in Table 3.16-1, the 2020-2045 RTP/SCS Demographics and Growth Forecast Technical Report shows an estimated 11% increase in the population of Los Angeles County over the next two decades, to 11.67 million inhabitants by 2045. The percent increase over the same period of time for the cities in which the Project Area are located (Cities of Hawthorne, Lawndale, Redondo Beach, and Torrance) is estimated to be around 4.5%. In addition, the Proposed Project was included in SCAG's 2020-2045 RTP/SCS and Metro's 2020 Long Range Transportation Plan (LRTP); the Proposed Project's construction and operational potential for inducing population, housing and employment was accounted for therein.

Table 3.16-1. Projected Population, Housing, and Employment Growth - 2016-2045

Area	Year	2016	2045	Percent Change
Los Angeles County	Population	10,110,000	11,674,000	15.5%
	Employment	4,743,000	5,382,000	13.5%
	Households	3,319,000	4,119,000	24.1%
Hawthorne	Population	89,400	92,900	3.9%
	Employment	29,700	31,600	6.4%
	Households	28,500	31,700	11.2%
Lawndale	Population	33,400	34,400	3.0%
	Employment	7,400	8,300	12.1%
	Households	9,700	10,200	5.2%
Redondo Beach	Population	68,200	72,900	6.9%
	Employment	25,400	28,300	11.4%
	Households	29,200	31,100	6.5%
Torrance	Population	147,100	153,100	4.1%
	Employment	126,600	133,800	5.7%
	Households	55,600	57,300	3.1%

Source: SCAG, 2020c

Note: Projected city data is only available for 2016 and 2045 in SCAG’s Connect SoCal 2020 Demographics and Growth Forecast Technical Report

The 2020-2045 RTP identifies the Project Area as being within a priority growth area—more specifically, as being within a Transit Priority Area (TPA) (within one half-mile of the Torrance TC), High Quality Transit Areas (HQTAs), and Neighborhood Mobility Areas (NMAs). TPA refers to an area within a half-mile of a major transit stop that is existing or planned. HQTAs are corridor-focused Priority Growth Areas within a half-mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. NMAs focus on creating, improving, restoring and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways and other destinations. NMAs are Priority Growth Areas with robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds.

By extending light rail service to the South Bay and, therefore, enhancing transit service in the area, the Proposed Project and Options would assist in accommodating the transportation demand anticipated from the existing and projected population and employment by improving transit access in the South Bay area. Growth that may indirectly result from implementation of the Proposed Project and Options 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 Proposed Project or Options would exceed any regional growth projections given the already densely developed condition of the South Bay area. While the Proposed Project and Options would provide transit service within the Project Area, it does not propose a major infrastructure system extension that could serve as a vector for growth and expansion into a new or rural area where growth is not anticipated.

It should be noted that by improving transportation along the alignment, by increasing alternative transportation modes and improving access to neighborhoods, civic resources, and employment opportunities, the Proposed Project and Options could potentially increase the incentive for

development on undeveloped or underutilized lots. Such development on underutilized land would largely represent a redistribution of the anticipated regional growth near the station rather than a large-scale development boom and would potentially result in a greater concentration of residential and commercial uses near the proposed transit stations. As discussed above, development in the Proposed Project area is anticipated. The general plans for the cities along the alignment each designate the types of uses allowable. Development along the Proposed Project and Options would be in accordance with the cities' approved general plans and zoning codes and any potential future growth, or lack thereof, would be under the cities' jurisdictions. Any new transit-oriented development projects would be subject to environmental and development review and approval by the appropriate jurisdiction.

With the implementation of the Proposed Project or Options, the opportunities for growth around transit would be improved 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 jurisdictions, but it would also help to reduce potential environmental impacts associated with foreseeable growth anticipated in the region. Growth that may indirectly result from implementation of the Proposed Project or Options 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 Proposed Project or Options would exceed any regional growth projections given the already densely developed condition of the area the Proposed Project and Options would serve. Therefore, no adverse effects associated with growth-inducement are anticipated.

3.16-2 Effects Found Not to be Significant

Section 15128 of the CEQA Guidelines states: "An EIR shall contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." Metro has determined that the Proposed Project and Options would not have the potential to cause significant impacts related to agricultural and forestry resources, mineral resources, population and housing, and wildfire. 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.

3.16-2.1 Agricultural and Forestry Resources

Based on Appendix G of the CEQA Guidelines, the Proposed Project and Options would have a significant impact on agricultural and forestry resources if the Proposed Project or Options would:

- > 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.
- > Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- > Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code [PRC] Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
- > Result in the loss of forest land or conversion of forest land to non-forest use.
- > 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.

3.16-2.1.1 *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 entirety of the Proposed Project and Options lie within what the California Department of Conservation defines as Urban and Built-Up Land (California Department of Conservation, 2022). Areas designated as Urban and Built-Up Land are not considered Important Farmland under PRC Sections 21060.1 and 21095. The California Department of Conservation does not identify any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within or adjacent to the footprint of the Proposed Project, Trench Option, or Hawthorne Option footprint. Therefore, neither the construction nor operations of the Proposed Project or Options would convert these farmlands into non-agricultural use and there would be **no impact**.

3.16-2.1.2 *Would the Proposed Project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. There are no identified agricultural resources or agricultural use within or adjacent to the footprints of the Proposed Project, Trench Option, or Hawthorne Option. Further, Los Angeles County does not participate in the Williamson Act program. Therefore, neither the construction nor operations of the Proposed Project or Options would conflict with agricultural zoning, use, or a Williamson Act contract and there would be **no impact**.

3.16-2.1.3 *Would the Proposed Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

No Impact. The footprints of the Proposed Project, Trench Option, and the Hawthorne Option and their adjacent lands are situated within a highly developed urban area with no forest land or timberland as defined by PRC Section 12220(g), Section 4526, or Section 51104(g). Therefore, neither the construction nor operations of the Proposed Project or Options would conflict existing zoning for or cause the rezoning of forest land, timberland, or timberland zoned Timberland Production and there would be **no impact**.

3.16-2.1.4 *Would the Proposed Project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. The footprints of the Proposed Project, Trench Option, and Hawthorne Option and their adjacent lands are situated within a highly developed urban area with no forest land within or adjacent to the project footprint. Therefore, neither the construction nor operations of the Proposed Project or Options would result in the loss of forest land or conversion of forest land into non-forest use and there would be **no impact**.

3.16-2.1.5 *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. As described in Sections 3.16-2.1.1 through 3.16-2.1.5 there are no farmland or forest land resources or land designated for farmland or forest land use within or adjacent to the footprints of the Proposed Project or Options and there would be **no impact**.

3.16-2.2 Mineral Resources

Based on Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact related to mineral resources if it would:

- > 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
- > 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

3.16-2.2.1 *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?*

No Impact. The Proposed Project and Options overlie parts of the Lawndale and Torrance oil fields in Los Angeles County, though there are no active oil wells within or adjacent to the footprints of the Proposed Project/Trench Option or Hawthorne Option. Several idle and abandoned/plugged oil/gas wells were identified within 1,500 feet of the footprints of the Proposed Project and Options, though none is directly within the bounds of where construction or operation of the Proposed Project or Options would occur (CalGEM, 2011). Refer to Figure 3.9-2 in Section 3.9, Hazardous Materials of Chapter 3, Environmental Impacts, in this Draft EIR for a detailed map of locations and statuses of wells in the vicinity of the Proposed Project and Options.

No other known mineral resources of value to region or residents of the state located within or adjacent to the footprints of the Proposed Project and Options and the Proposed Project and Options would neither directly nor indirectly result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state during construction and operation; therefore, there would be **no impact**.

3.16-2.2.2 *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?*

No Impact. As discussed in Section 3.16-2.2.1, while the Proposed Project and Options do overlie the Lawndale and Torrance oil fields, there are no active, idle, or abandoned/plugged oil wells within or adjacent to the footprints of the Proposed Project or Options. The general plans for the Cities of Lawndale, Redondo Beach, and Torrance address mineral resources (primarily oil) within their jurisdictions, but none delineate mineral resource recovery sites within or adjacent to the Proposed Project and option footprints (City of Lawndale, 1992f; City of Redondo Beach, 1993b and d; City of Torrance, 2010c). Therefore, the Proposed Project and Options would not result in the loss of a locally-important mineral resource recovery site delineated on a local plan during construction or operation and there would be **no impact**.

3.16-2.3 Population and Housing

Based on Appendix G of the CEQA Guidelines, the Proposed Project and Options would have a significant impact related to population and housing if it would:

- > 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).

- > Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.16-2.3.1 *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)?*

No Impact. The Proposed Project and Options do not propose new homes or businesses and, as discussed in Section 3.16-1, are designed to serve the current and planned growth in population, housing, and employment along the study corridor and to support the development of a multi-modal corridor consistent with local planning goals. While the Proposed Project and Options could potentially increase the incentive for development on undeveloped or underutilized lots by increasing alternative transportation modes and improving access, such development on underutilized land would largely represent a redistribution of the anticipated regional growth near the station rather than a large-scale development boom. In addition, the 2020-2045 SCAG RTP/SCS identifies the project area as a priority growth area and accounts for a light rail extension from the current Metro C Line (Green) terminus at the Redondo Beach (Marine) Station to Torrance in its population and housing projections (SCAG, 2020a). Therefore, the Proposed Project and Options would not induce substantial unplanned population growth during construction or operation and there would be **no impact**.

3.16-2.3.2 *Would the Proposed Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. As described in Chapter 2, Project Description, of this Draft EIR, the Proposed Project and Trench Option would be built and operated within an existing railroad right-of-way or median of a major arterial (Hawthorne Boulevard). Few full acquisitions of adjacent property are needed to construct or operate the Proposed Project and Options and the vast majority of these acquisitions are commercial use; no residential properties are considered for acquisition. Therefore, construction and operation of the Proposed Project and Options would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere and there would be **no impact**.

3.16-2.4 *Wildfire*

No Impact. Based on Appendix G of the CEQA Guidelines, the significance of impacts for wildfire are associated with projects that are located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

Because the Proposed Project and Options are not located within or near a state responsibility area or very high fire hazard severity zone, the Proposed Project and Options would not result in wildfire-related impacts during construction and operation and there would be **no impact**.

3.16-3 Significant and Unavoidable Impacts

This section is prepared in accordance with Section 21100(b)(2)(A) of the PRC and Section 15126.2(c) of the CEQA Guidelines, which require the discussion of any significant environmental effects that cannot be avoided if a project is implemented. These include impacts that can be mitigated but cannot be reduced to a less than significant level. An analysis of Proposed Project's and Options' environmental impacts is contained in Chapter 3, Environmental Impacts, of this Draft EIR.

This environmental impact analysis determines that there are no feasible mitigation measures to reduce significant impacts of regional air quality emissions during construction of the Trench Option or noise and vibration during construction of the Proposed Project and Options and operation of the Proposed

Project to less than significant. As such, the construction and operation of the Proposed Project and Options would result in significant and unavoidable impacts related to air quality and noise and vibration as summarized below and discussed in further detail in Section 3.4, Air Quality and Section 3.6, Noise and Vibration.

3.16-3.1 Air Quality

3.16-3.1.1 Construction Impacts

Only the Trench Option has a significant and avoidable impact related to regional emissions during construction. The Proposed Project and Hawthorne Option do not have significant and unavoidable impacts during construction or operation.

TRENCH OPTION

Significant and Unavoidable Impact. As the Trench Option would require more excavation than the Proposed Project or Hawthorne Option, more truck trips to haul excavated materials would be required to construct the trench. These increased truck trips would result in a temporary increase of regional NO_x emissions, in excess of the South Coast Air Quality Management District's (SCAQMD) daily threshold. While mitigation measure MM-AQ-1 would be implemented to require the use of zero or near zero emissions vehicles for the hauling of excavated materials to the extent feasible, the availability of these vehicles cannot be guaranteed in the timeframe required to bring the NO_x emissions below SCAQMD's daily regional emissions threshold. Therefore, the impacts related to construction air quality emissions of the Trench Options would be **significant and unavoidable**.

3.16-3.2 Noise and Vibration

3.16-3.2.1 Construction Impacts

Noise

Significant and Unavoidable Impact. The Proposed Project, Trench Option, and Hawthorne Option, would result in temporary and periodic increases in ambient noise levels due to construction activity that would exceed Federal Transit Administration's (FTA) standards, and, where applicable, the standards established by the local noise ordinances. While Mitigation Measure MM-NOI-1 would be implemented as a part of the project, which would include noise-reducing measures, there would still be temporary or periodic increases in ambient noise levels that exceed FTA construction impact criteria. There are no feasible mitigation measures to reduce construction noise levels below the FTA's threshold of a significant impact. Therefore, impacts related to construction noise would be **significant and unavoidable**.

Vibration

Significant and Unavoidable Impact. Construction of the Proposed Project would result in significant damage and annoyance vibration impacts, resulting from operation of the construction equipment (e.g., vibratory roller and impact pile driver) near residential structures and sensitive land uses. Mitigation measure MM-VIB-1 would require the contractor to prepare a Vibration Control Plan, conduct monitoring to demonstrate compliance with the vibration limits, and use alternative construction methods to reduce vibration impacts as feasible. MM-VIB-2 would require that operation of vibratory rollers within 26 feet of a building structure would be in static mode only, and that the use of vibratory pile drivers not occur within 22 feet of a building, as well as require the use of alternative pile driving techniques, such as CIDH, when feasible. After implementation of MM-VIB-1 and MM-VIB-2, potential damage impacts would remain at a multifamily residential structure near the relocated Grant Avenue

freight bridge, where impact pile driving is required. The analysis conservatively assumes that it would be infeasible to use a less impactful type of equipment to construct the freight bridge. Implementation of MM-VIB-3 would require the contractor to perform pre- and post-construction surveys to document preexisting damage, and damage that may have occurred from construction activities, and repair any damage caused by the project. Even with implementation of mitigation measures, the Proposed Project would have a **significant and unavoidable impact** related to vibration damage during construction.

While the Trench Option and Hawthorne Option do not require the reconstruction of the Grant Avenue bridge and thus do not necessitate impact pile driving near residences, operation of other construction equipment could result in annoyance impacts during construction of the Trench Option and Hawthorne Option, as well as the Proposed Project. MM-VIB-1 would reduce vibration levels, but annoyance impacts would remain, as there are no feasible mitigation measures to fully reduce vibration levels below FTA thresholds for annoyance. The Proposed Project would have a **significant and unavoidable impact** during construction related to vibration for annoyance.

3.16-3.2.2 Operational Impacts

Noise

Significant and Unavoidable Impact. Operation of the Proposed Project would result in increases in noise levels that exceed the FTA standards, and there would be a significant impact for sensitive uses (e.g., homes, parks) in some areas along the corridor. The light rail would cross at-grade at 170th and 182nd Streets, where there would be crossing signals that would contribute to noise near sensitive uses. Noise would also be contributed by the freight trains that operate within the Metro ROW today and would continue to operate on the freight track, some portions of which would be shifted by the Project. The majority of noise associated with freight trains is from warning horns that are sounded within one quarter mile of at-grade crossings. As part of PF-NV-1, the at-grade freight crossings have been designed and would be constructed to include all the safety infrastructure and improvements needed to allow the local jurisdictions to establish a quiet zone(s). Mitigation measure MM-NOI-4 would require Metro to coordinate with and support the cities of Redondo Beach, Lawndale, and Torrance in establishing quiet zone(s) and for those cities to follow the Federal Railroad Administration (FRA) requirements for designating quiet zone(s). The quiet zone(s) made possible by the Proposed Project could extend from north of Inglewood Avenue to south of 182nd Street, thereby eliminating freight horn noise for approximately three miles through residential areas within Lawndale, Redondo Beach, and Torrance. PF-NV-2 and PF-NV-3 would reduce signal bell noise at 170th and 182nd Streets, subject to California Public Utilities Commission (CPUC) authorization. Mitigation measures MM-NOI-2 and MM-NOI-3 would be implemented, which would require installation of soundwalls near identified sensitive uses and special trackwork including low impact frogs at crossovers. However, some light rail noise impacts would still remain near the 170th Street at-grade crossing. Even with implementation of mitigation measures MM-NOI-2, MM-NOI-3, and MM-NOI-4, the Proposed Project would have a **significant and unavoidable impact** during operation related to noise.

With implementation of mitigation measures MM-NOI-2, MM-NOI-3, and MM-NOI-4, the Trench Option would have a less than significant impact. However, if Cities did not implement quiet zone(s) pursuant to MM-NOI-4 to reduce freight horn noise, the Trench Option would have a **significant and unavoidable impact** during operation.

3.16-4 Significant and Irreversible Environmental Changes

Public Resources Code Section 21100(b)(2)(B) and Section 15126.2(d) of the CEQA Guidelines require that an EIR discuss the extent to which the project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations would not be able to reverse, involves uses in which irreversible damage could result from any potential environmental accidents associated with the Proposed Project (including Options), or entails the consumption of resources that is not justified.

Less than Significant Impact. Construction and operation of the Proposed Project and Options would use nonrenewable resources, including fossil fuels, natural gas, water, and building materials. Construction would result in the irretrievable commitment of these nonrenewable energy resources, primarily fossil fuels and natural gas. However, the use of energy for construction activities would be consistent with other Metro construction projects and would not substantially affect the availability of such resources. Operation of the Proposed Project and Options would also consume nonrenewable resources. However, the consumption of resources for operation would be consistent with other Metro light rail lines and would provide a regional transportation benefit; therefore, it would not represent a wasteful or unnecessary use of energy.

As discussed in Section 3.11, Utilities and Service Systems and 3.12, Energy, the amount and rate of consumption of nonrenewable resources from the construction and operation of the Proposed Project and Options would not result in significant environmental impacts or result in the unnecessary, inefficient, or wasteful use of resources. Therefore, impacts related to significant and irreversible environmental changes would be **less than significant**.