CHAPTER 4 OTHER CEQA REQUIRED TOPICS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines identifies the subjects that shall be discussed in an environmental impact report (EIR), including effects determined not to be significant, significant and unavoidable impacts, significant irreversible environmental changes, and growth inducing effects. Effects determined not to be significant, significant and unavoidable, and significant irreversible environmental changes are discussed in the following sections. Growth inducing effects are addressed in Section 3.10.

4.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines states "an EIR shall contain a brief statement indicating reasons that various possible effects of a project were determined not to be significant and not discussed in detail in the EIR." Effects found not to be significant for the project include agriculture and forestry resources and wildfire, which are summarized below. All other CEQA required environmental topics are addressed in Sections 3.2 through 3.19 of Chapter 3.

4.1.1 AGRICULTURE AND FORESTRY RESOURCES

4.1.1.1 IMPACT AFR-1: FARMLAND

Impact AFR-1: Would the 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 KNE resource study area (RSA) for agricultural and forestry resources is defined as a 300-foot radius around the alignments and stations, design option, and Maintenance and Storace Facility (MSF). The KNE RSA is located in heavily developed urban and suburban areas of the City of Los Angeles and City of West Hollywood. The KNE RSA is located on land designated by the California Department of Conservation's Important Farmland map as Urban and Built-Up Land (California Department of Conservation 2022). Areas designated as Urban and Built-Up Land are not considered Important Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) under CEQA (Public Resources Code Sections 21060.1 and 21095 and CEQA Guidelines Appendix G). As discussed in Section 3.13, Land Use and Planning, there are no agricultural land uses within the KNE RSA. The KNE alignments and stations, design option, and MSF would not directly affect or result in conversion of this land to non-agricultural uses. Therefore, KNE would have no impact during construction and operation.

4.1.1.2 IMPACT AFR-2: AGRICULTURAL USE

Impact AFR-2: Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact. There are no identified agricultural resources or areas zoned for agricultural uses within the KNE RSA. No Williamson Act contracts are applicable within the KNE RSA. The KNE alignments and

stations, design option, and MSF would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, KNE would have no impact during construction and operation.

4.1.1.3 IMPACT AFR-3: FORESTLAND

Impact AFR-3: Would the project 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))?

No Impact. The KNE RSA is located 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). The KNE alignments and stations, design option, and MSF would not conflict with existing zoning or cause the rezoning of forest land or timberland. Therefore, KNE would have no impact during construction and operation.

4.1.1.4 IMPACT AFR-4: FORESTLAND CONVERSION

Impact AFR-4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The KNE RSA is located within a highly developed urban area with no forest land. The KNE alignments and stations, design option, and MSF would not change the existing environment in a manner that would result in the loss of forest land or conversion of forest land into non-forest uses. Therefore, KNE would have no impact during construction and operation.

4.1.1.5 IMPACT AFR-5: FARMLAND CONVERSION

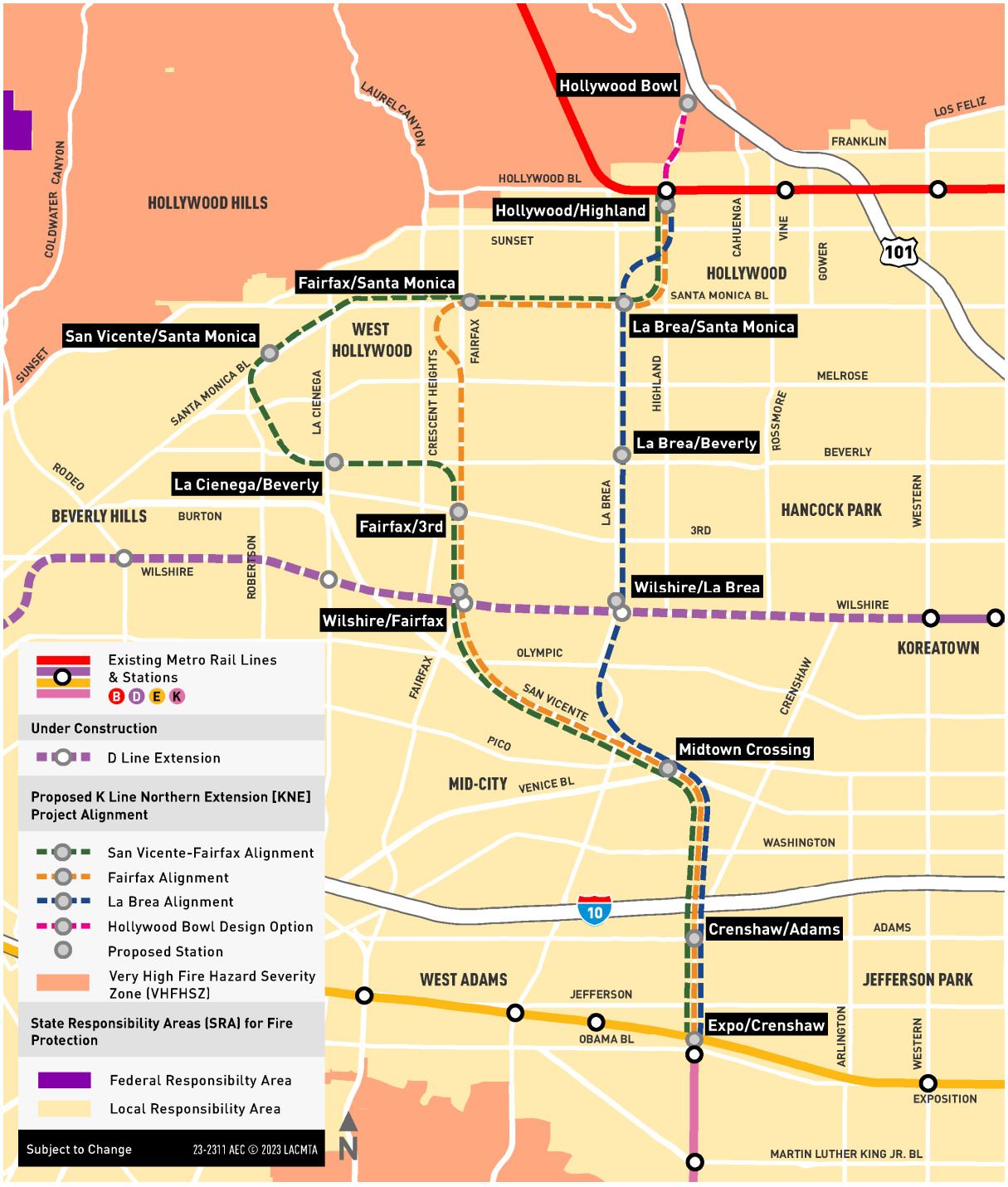
Impact AFR-5: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. There are no farmland or forest land resources or land designated for farmland or forest land use within the KNE RSA. The KNE alignments and stations, design option, and MSF would not cause changes in the environment that could result in conversion of farmland or forest land to non-forest uses. Therefore, KNE would have no impact during construction and operation.

4.1.2 WILDFIRE

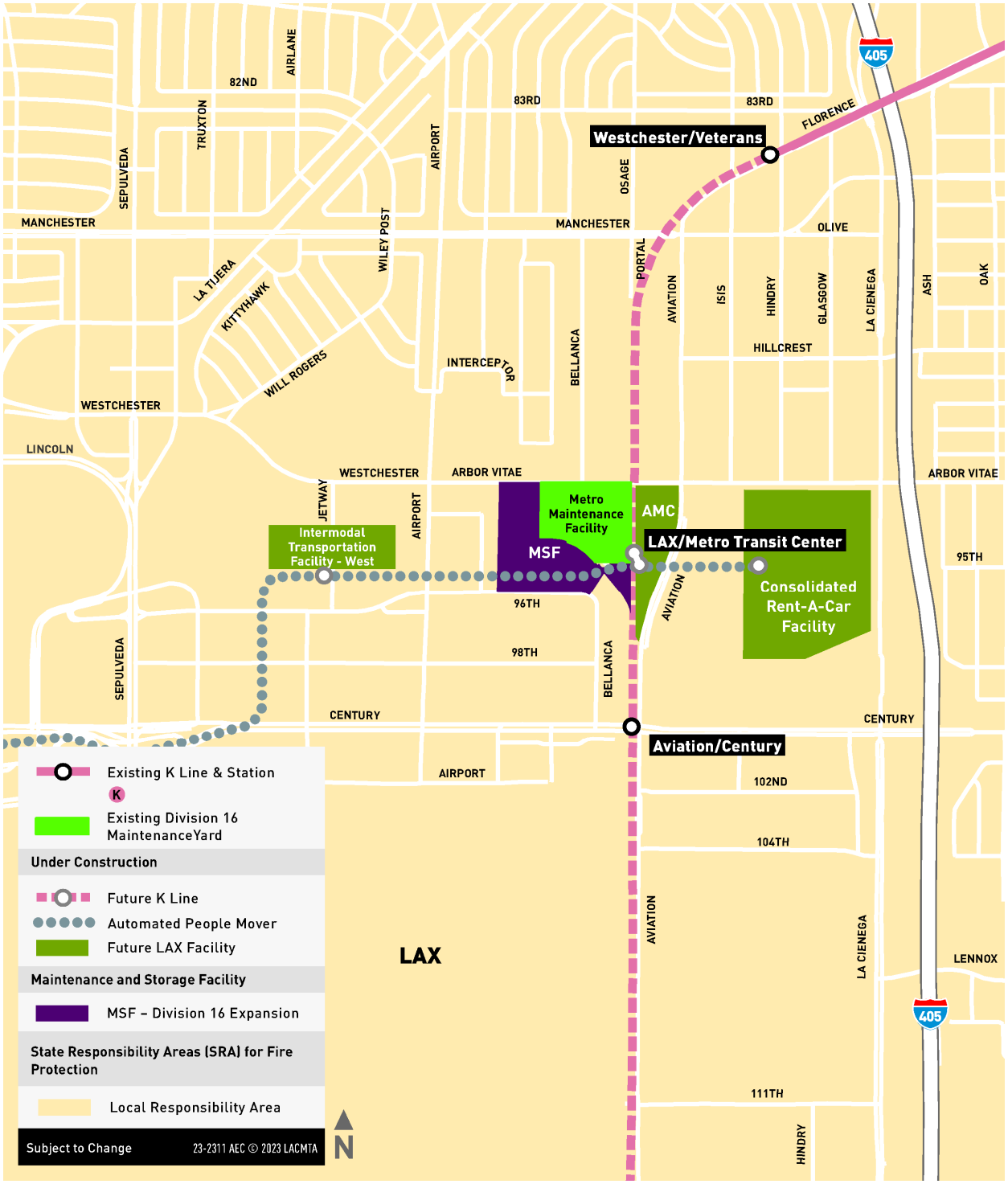
The KNE RSA for the wildfire assessment is defined as a 0.25-mile radius around the alignments and stations, design option, and MSF. According to Appendix G of the CEQA Guidelines, wildfire impacts are determined based on whether a proposed project would occur within or near a State Responsibility Area (SRA) or on lands classified as Very High Fire Hazard Severity Zones (VHFHSZ). The California Department of Forestry and Fire Protection (CAL FIRE) VHFHSZ database identifies areas designated as SRAs and Local Responsibility Areas (LRA) (CAL FIRE 2024). The KNE RSA is located within an LRA. The Hollywood Bowl Design Option is located within the LRA and in a VHFHSZ, as shown in Figure 4-1. The MSF is not located within an SRA or VHFHSZ, as shown in Figure 4-2.

FIGURE 4-1. FIRE HAZARD SEVERITY ZONES AND RESPONSIBILITY AREAS IN THE VICINITY OF THE PROJECT ALIGNMENTS



Source: Connect Los Angeles Partners 2024

FIGURE 4-2. FIRE HAZARD SEVERITY ZONES AND RESPONSIBILITY AREAS IN THE VICINITY OF THE MSF



Source: Connect Los Angeles Partners 2024

4.1.2.1 IMPACT WFR-1: EMERGENCY RESPONSE PLANS

Impact WFR-1: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

ALIGNMENTS AND STATIONS

No Impact. The KNE alignments and stations are not located within lands classified as an SRA or a VHFHSZ and would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, the KNE alignments and stations would have no impact during construction and operation.

HOLLYWOOD BOWL DESIGN OPTION

Less than Significant Impact. The Hollywood Bowl Design Option is located outside of an SRA but within a VHFHSZ. However, with the exception of the station entrance(s), this portion of the project would be underground. Therefore, operation of the design option would not substantially impair an adopted emergency response plan or emergency evacuation plan. As part of the Los Angeles County Metropolitan Transportation Authority's (Metro) standard development procedures, construction and traffic management plans would be submitted to the City of Los Angeles Department of Transportation and the Los Angeles Fire Department for review and approval to ensure that the design option has adequate emergency access and escape routes during construction, in compliance with existing regulations. In addition, construction of the design option would not introduce any features that would preclude implementation of or alter these policies or procedures, and construction activities would not impair implementation of, or physically interfere with, the emergency response plan. Development and implementation of construction and traffic management plans would ensure that construction activities associated with the Hollywood Bowl Design Option would not impair an adopted emergency response plan or emergency evacuation plan. Therefore, the Hollywood Bowl Design Option would have a less than significant impact during construction and operation.

MAINTENANCE AND STORAGE FACILITY

No Impact. The MSF is not located within lands classified as an SRA or a VHFHSZs and would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, the MSF would have no impact during construction and operation.

4.1.2.2 IMPACT WFR-2: WILDFIRE RISK AND POLLUTANTS

Impact WFR-2: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

ALIGNMENTS AND STATIONS

No Impact. The KNE alignments and stations are not located within an SRA or a VHFHSZ and would not result in wildfire-related impacts, as shown in Figure 4-1. Therefore, the KNE alignments and stations would have no impact during construction and operation.

HOLLYWOOD BOWL DESIGN OPTION

Less than Significant Impact. The Hollywood Bowl Design Option is located outside of an SRA but within a VHFHSZ. While the entirety of design option is within an area with vegetation that can be prone to fire, the vegetated areas are not contiguous due to the presence of the roads and parking areas for the Hollywood Bowl. Additionally, with the exception of the station entrance(s), the design option would be underground where it would not exacerbate wildfire risks. The Hollywood Bowl Station would be situated within an existing parking area and would be constructed of non-flammable materials. Although the surrounding areas could experience a wildfire, the design option would not exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire impacts. Therefore, the Hollywood Bowl Design Option would have a less than significant impact during construction and operation.

MAINTENANCE AND STORAGE FACILITY

No Impact. The MSF is not located within an SRA or a VHFHSZ and would not result in wildfire-related impacts, as shown in Figure 4-2. Therefore, the MSF would have no impact during construction and operation.

4.1.2.3 IMPACT WFR-3: INFRASTRUCTURE INSTALLATION AND MAINTENANCE IN WILDFIRE ZONES

Impact WFR-3: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the 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?

ALIGNMENTS AND STATIONS

No Impact. The KNE alignments and stations are not located within or near an SRA or VHFHSZ. They would not require construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, telecommunications, or natural gas facilities, and would not require installation or maintenance of other associated infrastructure that may exacerbate fire risk. Therefore, the KNE alignments and stations would have no impact during construction and operation.

HOLLYWOOD BOWL DESIGN OPTION

Less than Significant Impact. The Hollywood Bowl Design Option is located outside of an SRA but within a VHFHSZ. However, it would not require construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, telecommunications, or natural gas facilities, and would not require installation or maintenance of other associated infrastructure that may exacerbate fire risk. Therefore,

the Hollywood Bowl Design Option would have a less than significant impact during construction and operation.

MAINTENANCE AND STORAGE FACILITY

No Impact. The MSF is not located within an SRA or VHFHSZ. It would not require construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, telecommunications, or natural gas facilities, and would not require installation or maintenance of other associated infrastructure that may exacerbate fire risk. Therefore, the MSF would have no impact during construction and operation.

4.1.2.4 IMPACT WFR-4: EXPOSURE TO RISKS

Impact WFR-4: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the 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?

ALIGNMENTS AND STATIONS

No Impact. The KNE alignments and stations are not located within an SRA or VHFHSZ. As such, they would not exacerbate wildfire risks and would not expose people or structures to a significant risk associated with wildland fires, such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the KNE alignments and stations would have no impact during construction and operation.

HOLLYWOOD BOWL DESIGN OPTION

Less than Significant Impact. The Hollywood Bowl Design Option is located outside of an SRA but within a VHFHSZ. However, while the entirety of design option is within an area with vegetation that can be prone to fire, the vegetated areas are not contiguous due to the presence of the roads and parking areas for the Hollywood Bowl. Additionally, with the exception of the station entrance(s), the design option would be underground where it would not exacerbate wildfire risks. The Hollywood Bowl Station would be situated within an existing parking area and would be constructed of non-flammable materials. Operation of the design option would not exacerbate or cause conditions leading to landslides, liquefaction, lateral spreading, subsidence, or collapse. Additionally, implementation of project measure PM GEO-1 during design and construction would include stabilization of soils. As a result, construction and operation would not result in loss of soil stability. Therefore, the Hollywood Bowl Design Option would have a less than significant impact during construction and operation.

MAINTENANCE AND STORAGE FACILITY

No Impact. The MSF is not located within an SRA or VHFHSZ. As such, it would not exacerbate wildfire risks and would not expose people or structures to a significant risk associated with wildland fires, such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the MSF would have no impact during construction and operation.

4.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

This section is prepared in accordance with Section 15126.2(c) of the CEQA Guidelines, which requires the discussion of any significant environmental impacts that cannot be avoided if a project is implemented. These include impacts that can be mitigated but cannot be reduced to a less than significant level. An analysis of environmental impacts is provided in Chapter 3, Environmental Analysis.

This environmental impact analysis for KNE identified significant impacts related to biological resources, cultural resources, paleontological resources, hazards and hazardous materials, noise and vibration, public facilities, and tribal cultural resources. Mitigation measures have been identified to reduce all identified significant impacts to a less than significant level, except for cultural resources and paleontological resources. KNE would result in a significant and unavoidable impact during construction related to cultural resources and paleontological resources as summarized below and discussed in further detail in Section 3.6, Cultural and Paleontological Resources.

4.2.1 CULTURAL RESOURCES

ALIGNMENTS AND STATIONS

Significant and Unavoidable Impact. Though mitigation would be implemented, construction of the KNE alignments and stations would cause substantial adverse changes in the significance of historical resources (Impact CUL-1). Specifically, physical demolition of historical resources would materially impair their significance. Mitigation measures MM CUL-3 (Historical Resources Archival Documentation), MM CUL 4 (Interpretive Program), and MM CUL-5 (Cultural Resources Monitoring and Mitigation Plan) would be implemented to reduce impacts at these resources, which are located at the parcels identified below.

For the KNE San Vicente–Fairfax Alignment, these parcels are:

- 6806 Hollywood Boulevard
- Rexall Drug Store, Lee Drug Company (6800 Hollywood Boulevard)
- Bank of America (6780 Hollywood Boulevard)
- Hollywood Theater (6766 Hollywood Boulevard)
- Santa Palm Car Wash (8787 Santa Monica Boulevard)

For the KNE Fairfax Alignment, these parcels are:

- 6806 Hollywood Boulevard
- Rexall Drug Store, Lee Drug Company (6800 Hollywood Boulevard)
- Bank of America (6780 Hollywood Boulevard)
- Hollywood Theater (6766 Hollywood Boulevard)

For the KNE La Brea Alignment, these parcels are:

- 6806 Hollywood Boulevard
- Rexall Drug Store, Lee Drug Company (6800 Hollywood Boulevard)
- Bank of America (6780 Hollywood Boulevard)
- Hollywood Theater (6766 Hollywood Boulevard)

Because these historical resources would be demolished during construction, the impact would not be reduced to a less than significant level. Therefore, the KNE San Vicente–Fairfax, Fairfax, and La Brea Alignments would have a significant and unavoidable impact related to historical resources during construction.

HOLLYWOOD BOWL DESIGN OPTION

There would be no significant and unavoidable impacts related to cultural resources for construction or operation of the Hollywood Bowl Design Option.

MAINTENANCE AND STORAGE FACILITY

There would be no significant and unavoidable impacts related to cultural resources for construction or operation of the MSF.

4.2.2 PALEONTOLOGICAL RESOURCES

ALIGNMENTS AND STATIONS

Significant and Unavoidable Impact. Although mitigation would be implemented, construction of the KNE alignments and stations could directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature (Impact PAL-1). In areas where tunnel boring machines (TBMs) are used for tunneling, mitigation measures MM PAL-1 (Paleontological Resources Monitoring and Mitigation Plan), MM PAL-2 (Worker Education), and MM PAL-3 (Paleontological Monitoring) would not reduce impacts to a less than significant level. Therefore, the KNE San Vicente–Fairfax Alignment, the Fairfax Alignment, and the La Brea Alignment, which all involve TBMs, would have significant and unavoidable impacts during construction.

HOLLYWOOD BOWL DESIGN OPTION

Significant and Unavoidable Impact. Although mitigation would be implemented, construction of the Hollywood Bowl Design Option could directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature (Impact PAL-1). In areas where the sequential excavation method is used to excavate the tunnels and the Hollywood Bowl Station, mitigation measures MM PAL-1 (Paleontological Resources Monitoring and Mitigation Plan), MM PAL-2 (Worker Education), and MM PAL-3 (Paleontological Monitoring) would not reduce impacts to a less than significant level. Therefore, the Hollywood Bowl Design Option, which would employ the sequential excavation method, would have a significant and unavoidable impact during construction.

MAINTENANCE AND STORAGE FACILITY

There would be no significant and unavoidable impacts related to paleontological resources for construction or operation of the MSF.

4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by a project. Specifically, Section 15126.2(d) states:

> *Uses of nonrenewable resources during the initial and continued phases of the 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 the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Construction and operation of KNE, including the alignments and stations, design option, and MSF, 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 KNE would also consume nonrenewable resources. However, as discussed in Section 3.7, Energy, the consumption of resources for operation would be consistent with other Metro light rail lines and would provide a regional transportation benefit due to overall reductions in vehicle miles traveled and would not represent a wasteful or unnecessary use of energy.

The construction and operation of KNE would result in irreversible environmental changes to existing natural resources, such as a commitment to use of energy and water resources as a result of operation and maintenance. However, as discussed in Section 3.7, Energy, construction and operation of KNE would not result in significant environmental impacts nor result in the unnecessary, inefficient, or wasteful use of resources. KNE would contribute to a reduction in regional energy consumption that is consistent with objectives of regional planning strategies to reduce reliance on fossil fuels and nonrenewable resources.