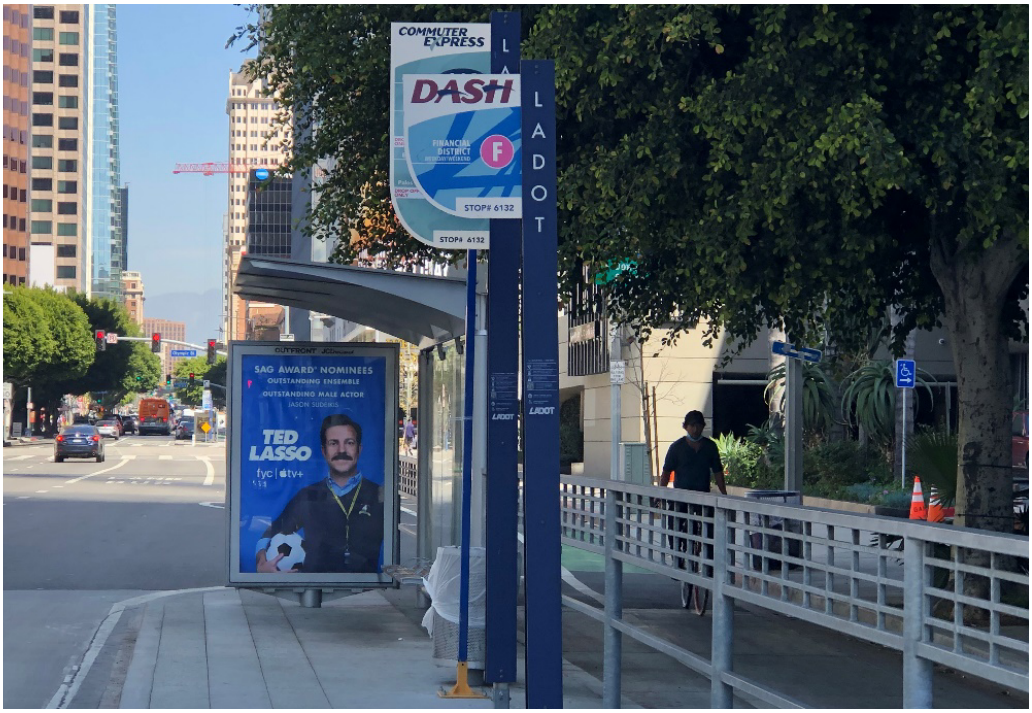
CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY/DRAFT MITIGATED NEGATIVE DECLARATION

Sidewalk and Transit Amenities Program



Prepared for:
City of Los Angeles Department of Public Works
Bureau of Engineering
and
Bureau of Street Services (StreetsLA)

Prepared by:
PARSONS

August 2021

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CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, LOS ANGELES, CA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
DRAFT MITIGATED NEGATIVE DECLARATION
(Article I, City CEQA Guidelines)

LEAD AGENCY AND ADDRESS:	City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, Suite 600 Los Angeles, CA 90015-2213	**COUNCIL DISTRICT** ALL

PROJECT TITLE: Sidewalk and Transit Amenities Program (STAP)

PROJECT LOCATION: The Sidewalk and Transit Amenities Program (STAP) is a City-wide program and would be implemented on sidewalks within the public right-of-way throughout the City of Los Angeles.

DESCRIPTION: The City is proposing the replacement of the current Coordinated Street Furniture Program (CSFP) with the Sidewalk and Transit Amenities Program (STAP). The STAP would be implemented by the Bureau of Street Services (StreetsLA) and would install and upgrade transit shelters and associated amenities to provide shelter, shade, safety, and comfort to the City's transit riders, active transportation users, and pedestrians. The program would support public transit and shared use of the sidewalk; improve access and mobility; improve transit information and public service delivery; be a self-sustaining program through reinvestment of advertising revenues; and create a dynamic program that incorporates flexibility and collaboration with other City goals and programs. These goals would be achieved through efficient delivery of enhanced program elements and active management by the City. Construction of the transit shelters under STAP would occur over a 3-year time span, from 2022-2024 under the most aggressive schedule but may occur over a longer period of time upwards of 6 years (2022 to 2027). The City plans to contract the commercial partner to provide operations and maintenance of the transit shelters for 10 years with 2 potential 5-year extensions, in accordance with the agreements with the City.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY: N/A

FINDING: The City Engineer of the City of Los Angeles has determined the proposed project will not have a significant effect on the environment. See attached Initial Study.

SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED

Any written comments received during the public review period will be attached, together with the responses of the lead City agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

PERSON PREPARING THIS FORM: Norman Mundy Environmental Supervisor II	**ADDRESS:** 1149 S. Broadway, Suite 600, M/S 939 Los Angeles, CA 90015	**TELEPHONE NUMBER:** (213) 485-5737
SIGNATURE (Official): Maria Martin, Environmental Affairs Officer Environmental Management Group **DRAFT**		**DATE:**

SIDEWALK AND TRANSIT AMENITIES PROGRAM
MITIGATION MEASURES

Biological Resources

BIO-1 Vegetation clearing and construction in areas near mature trees or potential habitat for nesting birds shall be conducted between September 1 and February 15. Otherwise, a Qualified Biologist shall conduct a preconstruction nesting bird survey to determine if any nesting birds are present within 50 feet of the work site. This survey will be conducted no more than 7 days before the start of construction. Should nesting birds be found, an exclusionary buffer will be clearly marked around each active nest site. Construction or clearing shall not be conducted within this zone until the Qualified Biologist determines that the young have fledged or the nest is no longer active.

Cultural Resources

CUL-1: A Qualified Archeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall be retained for the project and will remain on call during all ground-disturbing activities. The Qualified Archaeologist shall ensure that a WEAP training, presented by a Qualified Archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures to be followed in the event of an unanticipated cultural resource find during construction. The WEAP training can be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

CUL-2: If an inadvertent discovery of archaeological materials is made during project-related construction activities, ground disturbances in the area of the find shall be halted within 50 feet of the find and the Qualified Archaeologist shall be notified of the discovery, who shall notify LABOE. If prehistoric or potential tribal cultural resources are identified, the consulting Native American Tribes shall be notified. The resource shall be fully documented by the Qualified Archaeologist or designee and a DPR 523 record shall be prepared.

The Qualified Archaeologist, in consultation with consulting Native American Tribes and LABOE, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is an historical resource, a unique archaeological resource, or tribal cultural resources). If avoidance is not feasible, the Qualified Archaeologist, in consultation with the City, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources will consist of, but will not be limited to, in-field

documentation, archival research, subsurface testing, excavation, and preparation of a final report and DPR 523 record. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of the final report and DPR 523 record(s) to LABOE and the South Central Coastal Information Center.

CUL-3: Should excavation activities extend past 3 feet bgs, an archaeological monitor shall be present for all ground-disturbing activities in native soil within the construction area. All archaeological monitors, working under supervision of the Qualified Archaeologist, shall have construction monitoring experience and be familiar with the types of historical and prehistoric resources that can be encountered. Ground-disturbing activities include, but are not limited to, excavation, trenching, grading, and drilling. A sufficient number of archaeological monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. The Qualified Archaeologist shall have the ability to recommend, with written and photographic justification, the reduction or termination of monitoring efforts to LABOE, and should LABOE and the consulting Native American Tribes concur with this assessment, then monitoring shall be reduced or ceased.

If an inadvertent discovery of archaeological materials is made during project-related construction activities, the archaeological monitor shall have the authority to halt ground-disturbing activities within 50 feet of the resource(s), and an ESA physical demarcation shall be constructed. The procedures for inadvertent discoveries described in CUL-1 shall be followed.

CUL-4: In the event of the inadvertent discovery of human remains, the contractor shall immediately notify the County Coroner and LABOE. If the County Coroner determines the remains are Native American in origin, the Coroner shall contact the NAHC in accordance with Health and Safety Code Section 7050.5 subdivision c, and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate the MLD for the remains per PRC 5097.98. Under PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the MLD regarding their recommendations, if applicable. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the California Health and Safety Code Section 7100 37 *et seq.* directing identification of the next-of-kin will apply.

PAL-1: A Qualified Professional Paleontologist meeting the standards outlined in the SVP guidelines (2010) shall be retained for the project and will remain on call during all ground-disturbing activities. The Qualified Professional Paleontologist shall ensure that a WEAP training is provided to all construction and

managerial personnel involved with the project. The WEAP training shall provide an overview of paleontological resources and outline regulatory requirements for the protection of paleontological resources. The WEAP will also cover the proper procedures in the event of an unanticipated paleontological resource discoveries. The WEAP training can be in the form of a video or PowerPoint presentation. Printed literature (handouts) can accompany the training and can also be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

PAL-2: If an inadvertent discovery of paleontological materials is made during project-related construction activities, ground disturbances in the area of the find shall be halted, and the Qualified Professional Paleontologist shall be notified regarding the discovery.

The Paleontologist, in consultation with StreetsLA, shall determine whether the resource is potentially significant. If determined to be significant, the paleontological resources will be recovered, prepared to the point of curation, identified, analyzed, and curated at the Natural History Museum of Los Angeles County or another accredited repository along with associated field data. At the completion of ground-disturbing activities, a report documenting the methods and results of paleontological fieldwork will be prepared by the Qualified Professional Paleontologist and submitted to StreetsLA and the fossil repository.

Land Use and Planning

LU-1 As provided in the individual specific plans, transit shelters (relocated or new) and associated amenities and signs to be located within the planning areas of adopted Specific Plans and Streetscape Plans shall be designed to comply (and subject to design review, if necessary) with applicable design guidelines and standards and sign regulations for street furniture and signs installed in the public road ROW prior to installation/construction.

LU-2 Transit shelters (relocated or new) and associated amenities to be located within overlay zones, Streetscape Plans, and CDO districts shall be designed to comply with applicable design guidelines and standards and sign regulations that are applicable to street furniture and signs in the public road ROW.

LU-3 Transit shelters (relocated or new) and associated amenities to be located within HPOZs shall be designed to comply with applicable guidelines and standards and sign regulations for street furniture and signs in the public road ROW as contained in individual Preservation Plans as approved by the individual Historic Preservation Boards.

Noise

NOI-1: When applicable (i.e., at instances when noise levels may approach or exceed City noise criteria), the following noise control measures should be adhered to:

- Construction or use of noise barriers, enclosures, or blankets
- Use of low noise, low vibration, low emission-generating construction equipment (e.g., *[quieter]* Tier 4 engines), as needed
- Maintenance of mufflers and ancillary noise abatement equipment
- Scheduling high noise-producing activities during periods that are least sensitive when most people are at work during daytime hours
- Routing construction-related truck traffic away from noise-sensitive areas
- Reducing construction vehicle speeds

Tribal Cultural Resources

TCR 1: Native American monitors from the consulting Native American Tribes who wish to participate shall be retained to monitor earth-moving activities that extend beyond 3 feet bgs in native soil. Should more than one Tribe wish to participate, Native American monitoring shall be conducted on a rotational basis among the participating Tribes; attendance is ultimately at the discretion of the Tribe(s) and as approved by StreetsLA.

The Native American monitors shall be present for all ground-disturbing activities that extend beyond 3 feet bgs in native soil. Ground-disturbing activities include, but are not limited to, excavation, trenching, grading, and drilling. A sufficient number of Native American monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage.

If an inadvertent discovery of tribal cultural resources is made during project-related construction activities, the Native American monitors shall have the authority to halt ground-disturbing activities within 50 feet of the resource(s), and an ESA physical demarcation shall be constructed. The Qualified Archaeologist and StreetsLA shall be notified regarding the discovery. StreetsLA shall consult with the consulting Native American Tribes regarding the significance and possible avoidance or treatment of the resource.

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ATTACHMENTS

A. Aesthetics and Visual Impacts Analysis
B. Air Quality and Greenhouse Gas Analysis
C. Cultural Resources Study
D. Land Use Consistency Analysis
E. Noise and Vibration Impact Analysis
F. Transportation/Traffic Impact Assessment

1.0 INTRODUCTION

1.1 Purpose of an Initial Study

The California Environmental Quality Act (CEQA) was enacted in 1970 to provide decision makers and the public with information about environmental effects of projects, as well as avoidance and minimization measures. The Bureau of Engineering (BOE) Environmental Management Group (EMG) has determined the proposed Sidewalk and Transit Amenities Program (STAP or project) is subject to CEQA and no exemptions apply; therefore, preparation of an Initial Study (IS) is required.

An IS contains a preliminary analysis, which is conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the IS concludes that the project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the lead agency may adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND).

This IS has been prepared in accordance with CEQA (Public Resources Code [PRC] §21000 *et seq.),* the State CEQA Guidelines (Title 14, California Code of Regulations [CCR], §15000 *et seq.),* and the L.A. CEQA Thresholds Guide, 2006.

1.2 Document Format

This IS is organized into seven sections and attachments:

- Section 1, Introduction: Provides an overview of the project and the CEQA environmental documentation process.
- Section 2, Project Description: Provides a description of project background, project objectives, project location, and project components.
- Section 3, Environmental Effects/Initial Study Checklist: Provides a detailed discussion of the environmental factors that would be potentially affected by the project.
- Section 4, Mitigation Measures: Provides the mitigation measures that would be implemented to ensure that the potentially significant adverse impacts of the project would be reduced to a less than significant level.
- Section 5, Preparation and Consultation: Provides a list of key personnel involved in the preparation of this IS and key personnel consulted.
- Section 6, Determination – Recommended Environmental Documentation: Provides the recommended environmental documentation for the project.
- Section 7, References: Provides a list of reference materials used during preparation of this IS.

- Attachments: Technical studies prepared in support of this IS, including the following:
  - A Aesthetics and Visual Impacts Analysis
  - B Air Quality and Greenhouse Gas Analysis
  - C Cultural Resources Study
  - D Land Use Consistency Analysis
  - E Noise and Vibration Impact Analysis
  - F Transportation/Traffic Impact Assessment

1.3 CEQA Process

Based on the findings of the IS and once adoption of an ND (or MND) has been proposed, a Notice of Intent (NOI) to adopt the ND or MND is circulated and a public comment period opens for no less than 20 days, or 30 days if there is State agency involvement. The purpose of this comment period is to provide public agencies and the general public an opportunity to review the IS and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the project. If a reviewer believes the project may have a significant effect on the environment, the reviewer should (1) identify the specific effect, (2) explain why it is believed the effect would occur, and (3) explain why it is believed the effect would be significant. Facts or expert opinion supported by facts should be provided as the basis of such comments.

After close of the public review period, the Board of Public Works considers the ND or MND, together with any comments received during the public review process, and makes a recommendation to the City Council on whether to approve the project. One or more Council committees may then review the proposal and documents and make its own recommendation to the full City Council. The City Council is the decision-making body and also considers the adoption of an ND or MND, together with any comments received during the public review process, in the final decision to approve or disapprove the project.

During the project approval process, persons and/or agencies may address either the Board of Public Works or the City Council regarding the project. Public notification of agenda items for the Board of Public Works, Council committees, and City Council is posted 72 hours prior to the public meeting or hearing. The Council agenda can be obtained by visiting the Council and Public Services Division of the Office of the City Clerk at City Hall, 200 North Spring Street, Suite 395; by calling (213) 978-1073 or (213) 978-1137, or via the internet at:

https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=c.search&tab=epackets

If the project is approved, the City will file a Notice of Determination (NOD) with the County Clerk within 5 days. The NOD will be posted by the County Clerk within 24

hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval of the project under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project and to issues which were presented to the lead agency by any person, either orally or in writing, during the public comment period.

As a covered entity under Title II of the Americans with Disabilities Act (ADA), the City of Los Angeles (City) does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities.

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2.0 PROJECT DESCRIPTION

2.1 Background

The proposed STAP is a Citywide program that would provide, operate, and maintain transit shelters and associated transit amenities within the public right-of-way (ROW). The project would be implemented by the City of Los Angeles Bureau of Street Services (LABSS or StreetsLA). The current Coordinated Street Furniture Program (CSFP), which provides and maintains the existing transit shelter inventory, is ending and would be replaced by STAP. Existing vendor contracts for advertising displays at transit shelters will end in December 2021, and new agreements under STAP are planned and would become effective beginning January 1, 2022. The transition period from CSFP to STAP will commence as soon as the new agreements are executed.

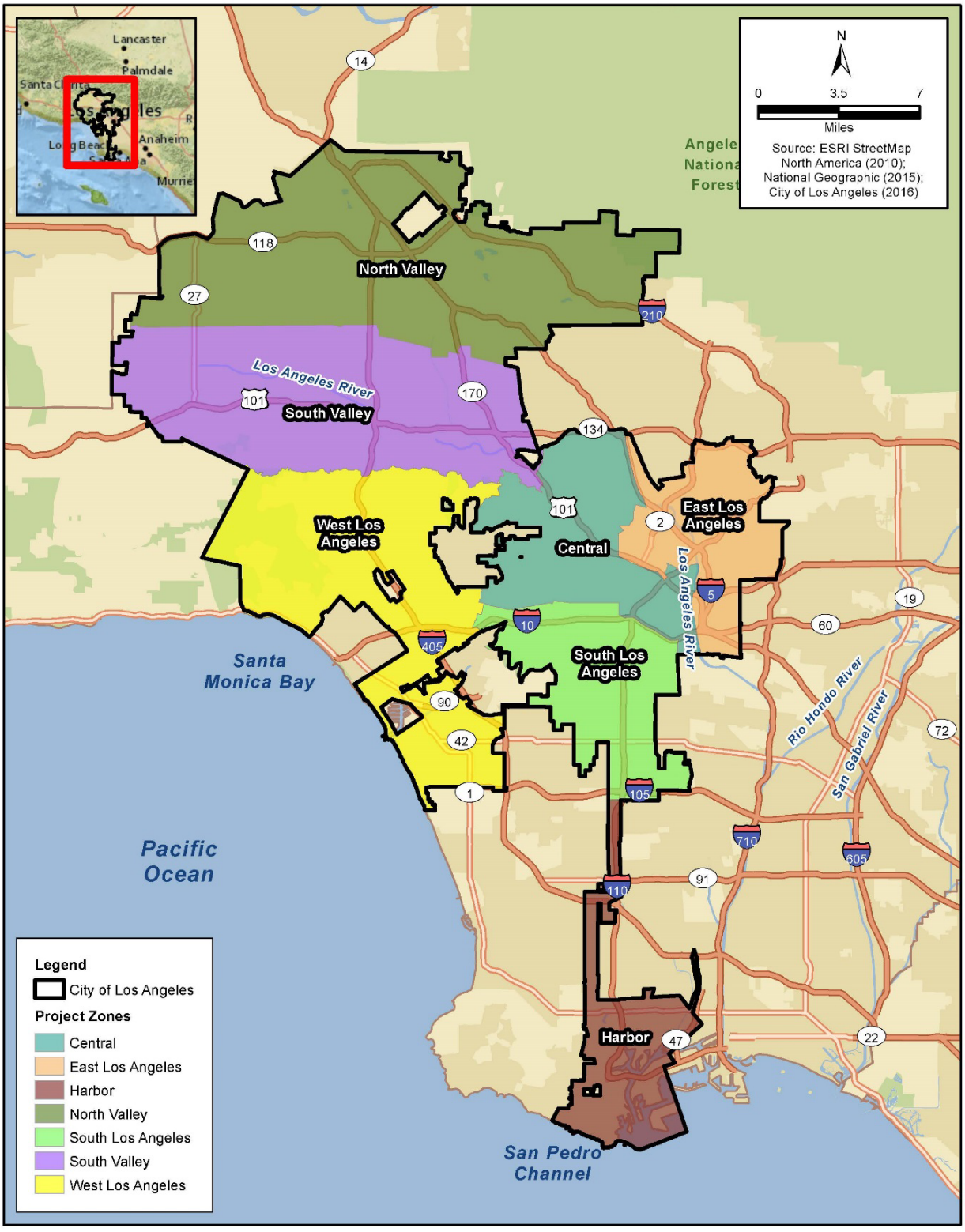
The City proposes STAP as a dynamic program that would add structures, technologies, and programs that benefit those who use the transit shelters, benches, kiosks, other street furniture, and related elements, while also providing advertising revenue that would be used to operate the program and maintain all of the program amenities. STAP would replace approximately 1,884 existing transit shelters with new transit shelters and provide upwards of 1,116 new transit shelters at bus stops currently absent such amenities. To expedite delivery of shelter, shade, safety, and comfort, STAP's Shelter Revitalization Program would refresh up to 664 of the existing shelters and redistribute them during the initial program years based on the rollout priority established by data and equity-driven criteria on a temporary, interim basis to provide a more immediate expansion of shade and shelter until such time the refreshed transit shelters may be replaced by new transit shelters as part of the STAP rollout process. Upwards of 3,000 transit shelters are anticipated to be installed as part of STAP.

2.2 Project Location and Setting

2.2.1 Location

The City covers approximately 468.7 square miles and is generally located at the southwestern section of Los Angeles County. It has a very irregular shape and consists of 35 separate communities within 7 Department of City Planning project zones, as shown in Figure 2-1, Project Location. Within the City, the following communities (either totally or partially) are located within the Coastal Zone: Brentwood/Pacific Palisades, Venice, Palms/Mar Vista/Del Rey, Winchester/Playa Del Rey, San Pedro, and Wilmington/Harbor City. Also located within the Coastal Zone is the Los Angeles Harbor Complex.

Figure 2-1. Regional Map



Public transit services in the City are provided by the Los Angeles County Metropolitan Transportation Authority (Metro), City of Los Angeles Department of Transportation (LADOT), Southern California Railroad Authority (SCRRA or Metrolink), and bus services from adjacent cities. Current inventory indicated that there are 1,884 existing transit shelters throughout the City, which are located at bus stops that are used by Metro, LADOT DASH and Commuter Express, Culver City, Santa Monica Big Blue Bus, and other regional and municipal bus operators. An interactive map showing the existing 1,884 transit shelter locations can be viewed at this link: http://www.outfrontjcdecaux.com/.

2.2.2 Setting

The City of Los Angeles is subdivided into seven Department of City Planning project zones: North Valley, South Valley, West Los Angeles, Central Los Angeles, East Los Angeles, South Los Angeles, and Harbor, each with an Area Planning Commission that serves to address significant planning and land use issues and review proposed plans and projects. These project zones contain one or more Council Districts, and some Council Districts are located in more than one project zone, as shown in Figure 2-2.

2.2.2.1 Project Zones

North Valley

The North Valley project zone is in the northernmost portion of the City and covers approximately 127 square miles. It includes the following communities: Chatsworth-Porter Ranch, Northridge, Granada Hills-Knollwood, Mission Hills-Panorama City-North Hills, Sylmar, Arleta-Pacoima, Sun Valley-La Tuna Canyon, and Sunland-Tujunga-Shadow Hills-Lakeview Terrace-East La Tuna Canyon.

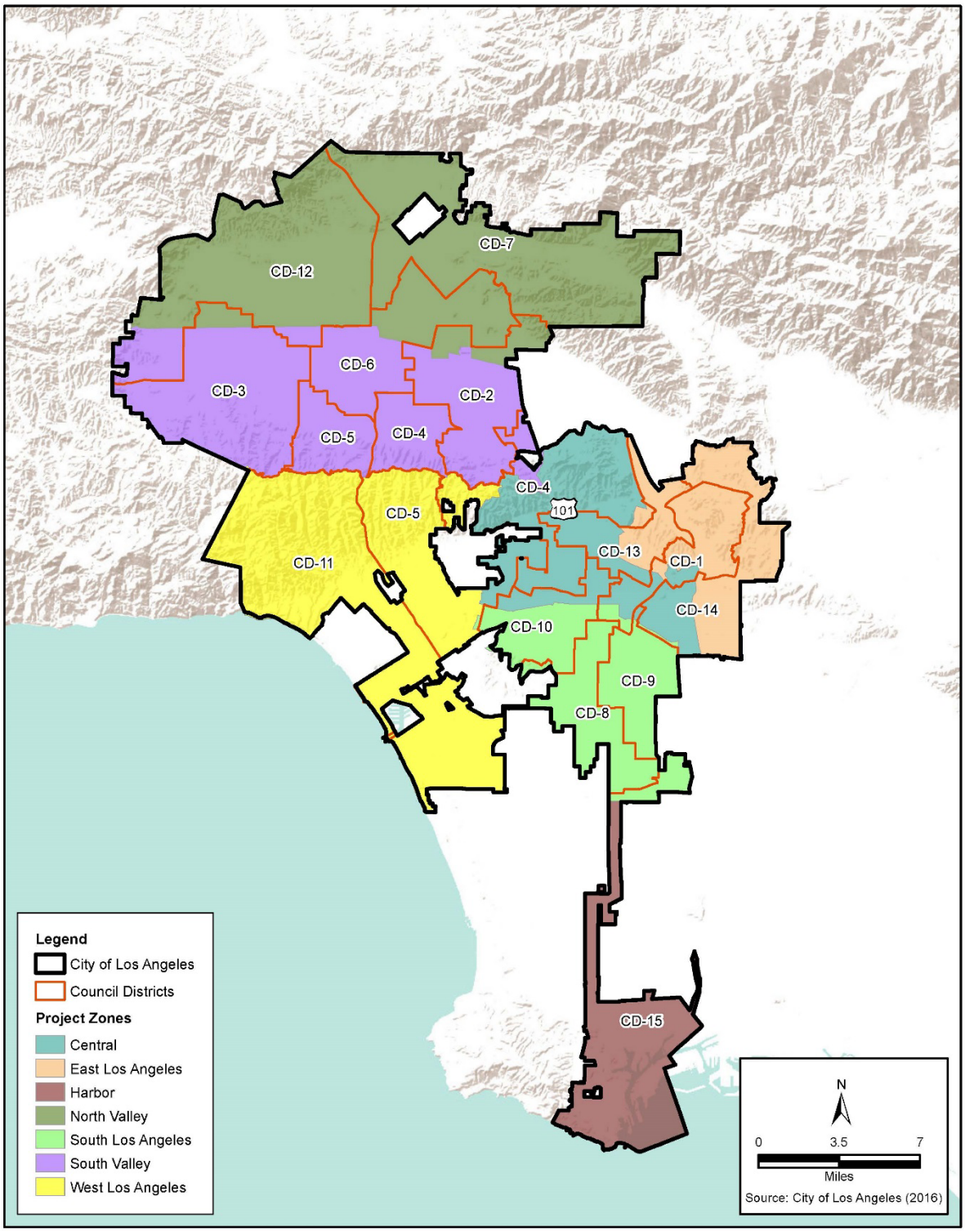
South Valley

The South Valley project zone is south of the North Valley project zone and covers approximately 98 square miles. It includes the following communities: Canoga Park-West Hills-Winnetka-Woodland Hills, Reseda-West Van Nuys, Encino-Tarzana, Van Nuys-North Sherman Oaks, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass, and North Hollywood-Valley Village.

West Los Angeles

The West Los Angeles project zone is in the western portion of the City, below the South Valley project zone, and covers approximately 90 square miles, portions of which fall within the California Coastal Zone. This project zone includes the following communities: Brentwood-Pacific Palisades, Bel Air-Beverly Crest, Westwood, West Los Angeles, Palms-Mar Vista, Venice, Del Rey, Westchester, Playa Del Rey, and Los Angeles International Airport.

Figure 2-2. City of Los Angeles Council Districts



Central Los Angeles

The Central Los Angeles project zone is in the central portion of the City and covers approximately 49 square miles. It includes the following communities: Hollywood, Wilshire, Westlake, Central City, and Central City North.

East Los Angeles

The East Los Angeles project zone is east of the Central Los Angeles project zone and covers approximately 38 square miles. It includes the following communities: Silver Lake-Echo Park, Northeast Los Angeles, and Boyle Heights.

South Los Angeles

The South Los Angeles project zone is south of the Central and East Los Angeles project zones. It covers approximately 44 square miles and includes the following communities: West Adams-Baldwin Hills-Leimert, South Los Angeles, and Southeast Los Angeles.

Harbor

The Harbor project zone is in the southernmost portion of the City and covers approximately 34 square miles, portions of which also fall within the California Coastal Zone. The Harbor project zone includes the following communities: Harbor-Gateway, Wilmington-Harbor City, San Pedro, and the Port of Los Angeles.

2.2.3 Infrastructure and Streets

Approximately 21 percent (63,888 acres) of all land in the City is developed as streets, storm drainage channels, utility facilities, and reservoirs. The street pattern is primarily characterized by a grid-like linear pattern that crosses through the City. Major infrastructure includes Chatsworth Reservoir, Sepulveda Basin, Los Angeles Reservoir, Hansen Dam, and the areas abutting Hansen Dam to the southwest.

The City currently maintains an inventory of 1,884 transit shelters, 197 public amenity kiosks, 6 vending kiosks, and 15 automated public toilets as part of its CSFP. Table 2-1 provides an inventory of these facilities. The CSFP is entirely funded by advertising revenue from advertising panels at most existing program furniture locations.

Table 2-1. Coordinated Street Furniture Program Inventory

Structures and Facilities	Number
Advertising Shelters	1,667
Non-Advertising Shelters	123
Rapid Bus Shelters	52
Los Angeles Neighborhood Initiative (LANI) Non-Advertising Shelters	42
Total Transit Shelters	1,884
Public Amenity Kiosks	197
Vending Kiosks	6
Total Advertising Panels (with 13% for public service programs)	3,679
Automatic Public Toilets (APTs) (owned/operated by a private firm)[1]	15

Source: StreetsLA, 2021.

2.3 Project Objectives

The STAP would be implemented by the Department of Public Works (DPW), Bureau of Street Services (StreetsLA) and would provide shelter, shade, safety, and comfort to the City's transit riders, active transportation users, and pedestrians. The program would support public transit and the shared use of the sidewalk; improve transit information and public service delivery; be a self-sustaining program through the reinvestment of advertising revenues to improve access and mobility; and create a dynamic program that incorporates flexibility and collaboration with other City goals and programs. These goals would be achieved through the efficient delivery of enhanced program elements and active management by the City.

The primary objectives of the STAP include the following:

- Promote and expand the use of transit, active transportation, and shared mobility by improving the quality and technological capability of associated physical program elements, such as transit shelters, kiosks, and other amenities
- Improve the intrinsic design qualities of street furniture and other public ROW infrastructure and streetscapes on a citywide basis
- Provide public benefits to help strengthen neighborhoods while facilitating an economical and physically sustainable project
- Foster a public-private collaborative approach to provide expanded and more equitable public services, regular STAP equipment maintenance, and revenue to the City using commercial advertising opportunities

[1] APTs are currently considered an option for inclusion in the new STAP but are not a mandatory component of the incoming program. The City is considering its options to pursue a separate public toilet program. Were the City to create a stand-alone public toilet program, the current APT inventory will be included as part of that program and will not be part of STAP.

2.4 Program Elements

Transit shelters are a mandatory program element. In addition to providing upwards of 3,000 new transit shelters, the STAP would also provide litter/recycling receptacles, digital displays, interactive information kiosks, vending kiosks, urban panels[2], and eLockers (click and collect lockers).

2.4.1 Program Principles

As the successor program to the CSFP, the STAP's highest priority remains the provision of program elements that contribute to the shelter, shade, safety, and comfort of transit riders, active transportation users, and pedestrians. It is the City's intention that program elements be functional; accessible, including to those with disabilities; easy to maintain; sustainable; and possessing superior design qualities, with the ability to be adapted to take advantage of evolving technologies. These characteristics would reflect the following principles:

- **Accessibility:** Designs would be compliant with the ADA Standards for Accessible Design (2010), the City's Proposed Guidelines for Accessible Rights-of-Way (PROWAG) (2015), and the U.S. Access Board's Public Right-of-Way Accessibility Guidelines (2011, as amended). In addition, the requirements of Title VI of the Civil Rights Act of 1964 and federal Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (2000), concerning limited English proficiency populations, would be fully considered to support the City's initiatives to increase access to the services associated with STAP.
- **Sustainability:** In support of the City's *Sustainability pLAn* (2015) and its subsequent update, LA's *Green New Deal* (2020), the City promotes sustainable practices in its operations and seeks to accelerate its transition to clean energy to meet climate goals. STAP program elements are expected to be sufficiently durable to withstand frequent public use and a range of weather conditions. They would be made from low-impact, natural, renewable, recyclable, and nontoxic materials. Other program materials developed for STAP, including most static advertising (except for plasticized films), would be able to be converted to biodegradable and/or common recyclable materials. In addition, the design of new program elements is intended to reduce the current level of maintenance efforts and costs, thereby having a smaller carbon footprint than the earlier program. Solar technology would also be considered for incorporation into STAP elements. When possible, STAP elements are intended to enhance or take advantage of existing tree canopies that provide natural shade and shelter.
- **Smart Technologies:** STAP envisions the design and installation of street infrastructure that would introduce smart technologies, such as shelter structures with charging stations for wireless devices, sensors indicating when

[2] Urban panels are digital displays that are positioned on the street level to be viewed by pedestrians and vehicular traffic.

maintenance or service is required, digital displays that count pedestrians and vehicles, and free WiFi connectivity to the Internet, among other potential innovations. In addition, with the rollout and continuing evolution of the program, it is anticipated that STAP program elements would be capable of incorporating small-cell towers and network devices to support 5G telecommunications service. Any physical structures and devices, embedded sensors, fiber-optic cabling, and networked systems incorporated as part of the STAP deployment would become part of the City's digital infrastructure inventory as overseen and managed by the City's Information Technology Agency.

2.4.2 Site Selection

The City anticipates installing upwards of 3,000 transit shelters as the key thrust of STAP, with upwards of 1,116 new transit shelters at bus stops currently absent such amenities. These new shelter construction and replacements may be implemented over a duration of 3 years (2022 to 2024) under the most aggressive installation scenario but may occur over a longer time period depending on the Capital Expenditure in which the City chooses to invest. This assumes that 26 to 27 new shelters would be installed each week, including relocations of existing furniture. Under a less aggressive implementation effort, shelter installations may occur over upwards of 6 years (2022 to 2027), with 13 to 14 new shelters installed each week, assuming work occurs 46 of 52 weeks each year, excluding holidays and weather delays.

The selection of sites for all STAP inventory, including the STAP Shelter Revitalization Program, would be guided by the goal to provide shelter, shade, safety, and comfort to the maximum number of transit riders, the users of active transportation, and pedestrians through a program that is sustained by revenue generated from advertising on the program elements. The physical placement of functional street furniture in locations where advertising space can generate the most revenue is of secondary importance. Through the STAP, the City intends to set a high standard for the use of public space through the installation of well-designed, functional furniture and digital displays that transform City streets into welcoming, vital streetscapes.

The City has also developed criteria to ensure equitable distribution of shelters. Placement of the STAP program elements would be guided by the City's overarching goals for the program, recommendations of the City Council, and the criteria identified below, as well as requests from members of the public, private landowners, and developers. The decision making for determining site locations, therefore, is part of an iterative process. Generally, STAP program elements would be sited according to street designation, zoning, and adjacent land uses, as provided in Table 2-2. However, the placement of program elements in areas with historic, scenic, sensitive resource, or other special designations may require special approvals and/or cooperative agreements.

Table 2-2. Transit Shelter Zoning Siting Parameters

	ROW Width (feet)	S/W Width (feet)	General Zoning/Land-Use								
			Agriculture	Residential Estate	One-Family Residential	One-Family Residential (RS Only)	Multi-Family Residential	Commercial	Manufacturing	Parking	Open Space
Corresponding Zones			**A1, A2, RA**	**RE40, RE20, RE15, RE11, RE9**	**R1, RU, RZ2.5, RZ3, RZ4, RW1**	**RS**	**R2, RD1.5, RD2, RD3, RD4, RD5, RD6, RMP, RW2, R3, RAS3, R4, RAS4, R5**	**CR, C1, C1.5, C2, C4, C5, CM**	**MR1, M1, MR2, M2, M3**	**P, PB**	**OS, PF, SL**
Major Arterial (Major Highway)											
Boulevard I	136	18									
Boulevard II	110	15									
Secondary Highway											
Avenue I	100	15									
Avenue II	86	15									
Avenue III	72	13									
Non-Arterial Streets											
Collector	66	13									
Industrial Collector	68	10									
Industrial Local	64	10									
Local Street - Standard	60	12									
Local Street - Limited	50	10									
Hillside Streets											
Hillside Collector	50	5									
Hillside Local	44	4									
Hillside Limited	36	4									

Table 2-2. Transit Shelter Zoning Siting Parameters

	ROW Width (feet)	S/W Width (feet)	General Zoning/Land-Use: Agriculture	Residential Estate	One-Family Residential	One-Family Residential (RS Only)	Multi-Family Residential	Commercial	Manufacturing	Parking	Open Space
Other Public Rights-of-Way											
One-Way Service Road	26-32	10									
Bi-Direction Service Road	34-42	10									
Pedestrian Malls	N/A	N/A									
City Scenic Highway											
Federal/State Scenic Highway*											

Legend

Not Allowed	No shelters/advertising displays allowed in front of properties.**
Limited Allowance	No advertising displays allowed next to one-family dwellings; shelters with/without advertising displays *may be* allowed elsewhere.**
Allowed	Shelters/advertising displays allowed.
In all cases	Shelters/advertising displays only allowed if site has sufficient space to facilitate installation in compliance with the City's PROWAG, including frontage or service road islands, bus islands, and designated bus stop zones within public ROWs.
**	Shelters with/without advertising displays ***may be*** allowed on side yards and reverse frontage (back yards) of one-family dwelling units facing streets with different classifications (e.g., one-family dwelling unit on a Local Street - Standard with reverse frontage on an Avenue II).

ROW – right-of-way
S/W – sidewalk
N/A – not applicable
* Refers to Officially Designated State Scenic Highways
Source: StreetsLA, 2021.

As shown, proposed transit shelters with or without advertising displays would be generally confined to the City's commercial, industrial, parking, and open space areas; no transit shelters with or without advertising displays would be constructed or replaced under this program along the frontage of properties on Hillside Limited Streets, Hillside Local Streets, designated federal and State Scenic Highways. and frontages of One-Family Residential zones.

It is the City's intent to prioritize and designate locations for the installation of transit shelters to ensure their equitable distribution while working towards achieving the City Council's express goal of having a minimum of 75 percent of transit boardings within each of the 15 Council Districts made from a location with a transit shelter.

Transit shelters rollout process would be guided by a data- and equity-driven priority criteria developed in partnership with Metro and organizations dedicated to improving access for people with disabilities and seniors, as well as environmental and transit advocacy and community-based organizations. Data utilized in prioritization of rollout locations are as follows:

- High transit ridership
- Exposure to heat (heat data generated by the Trust for Public Land)
- Metro's Equity Focus Communities (based on minority populations, low-income households, and zero-vehicle households)
- Proximity to trip generators, key destinations, service facilities, and low-frequency bus routes that indicate long wait times
- Specific site conditions, especially the ability to receive relocated or new STAP shelters

Please note that the possible shelter locations for future upgrades shown in the interactive map on the STAP website are preliminary locations based on the equity data above, but they would be further refined based on specific site conditions, especially the ability to receive relocated or new STAP shelters, the level of site rehabilitation required, and applicable City regulations (e.g., Specific Plans and overlay districts).

Following the assignment of priority rankings on a citywide basis based on the combination of the above factors, the ranked bus stops would be reviewed in relation to City Council District boundaries with the goal of deploying new or upgraded shelters at the highest ranked locations within each Council District. Once the 75 percent Council District goal is reached, additional shelter sites would be selected based on the established criteria indicating the highest rank prioritized locations citywide and specific requests for transit shelters by City offices, Neighborhood Councils, or constituents. Other program elements can be placed to serve advertiser demand when space and inventory allow through a collaborative site selection process. The City Council may reject proposed locations for placement of STAP program elements and suggest alternate locations. The ultimate determination of STAP element locations, however, resides with the Los Angeles Board of Public Works.

2.4.3 Digital Displays

The City proposes to replace static content advertising panels with digital-ready elements to increase program revenues and facilitate the expansion of elements that can deliver real-time information. The digital network would display City-sponsored transit rider, public safety, and public education and information messages in addition to commercial advertising. All signs in the digital network would be integrated into the City's Emergency Response Network, which would allow digital signs and devices to be used for providing urgent messages to the public, such as emergency evacuations and Silver and Amber Alerts.

Digital commercial content on STAP elements would not include any full motion video or sound. An exception may be made to allow sound as part of emergency messaging or to serve the needs of people with disabilities. Limitations would also be placed on brightness, as discussed in Section 2.4.4.

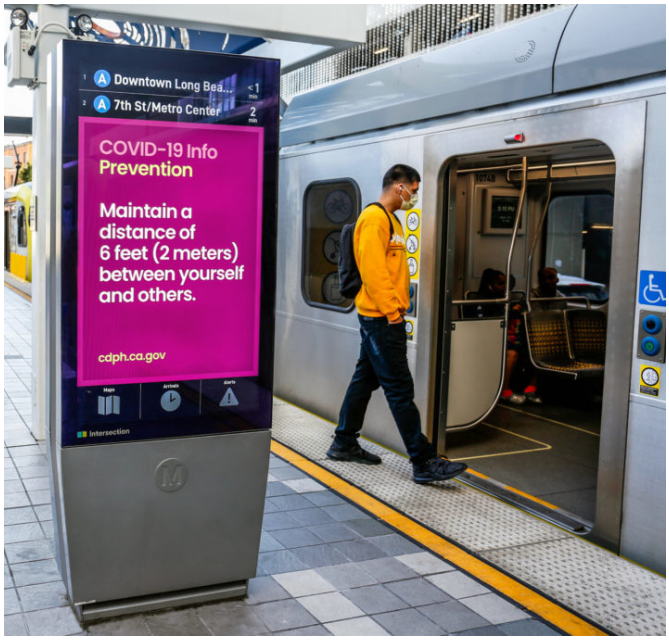
The number of digital displays would be guided by demand; however, the City anticipates in the first year of the STAP that up to 770 existing street furniture elements would be replaced by new infrastructure elements that would be digital-ready. Advertising would be allowed on new inventory only. Digital shelter advertising may be supplemented by urban panel installations at some of the new transit shelter locations.

The choice of digital displays and devices in terms of size, location, and functionality would be made with the needs of transit and active transportation users and pedestrians, in regard to the presentation of real-time bus arrival and departure information, and other public information. Digital displays are expected to be appropriate to the neighborhood setting and to adhere to community standards. Based on commercially available sizes, it is anticipated that STAP digital elements would range in size as follows:

- Transit Shelters have two 67- to 70-inch-high by 46- to 48-inch-wide digital displays.
- Digital Kiosks are pylon-like structures with displays that are up to 12 to 16 feet (192 inches) high and 48 inches wide.
- Interactive Kiosks have two 50- to 55-inch-high screens with variable widths.
- Digital Urban Panels come in two sizes: 67.5 inches high by 38.5 inches wide or 56 inches high by 38 inches wide.

Figure 2-3 provides examples of digital displays to be installed at transit shelters.

Figure 2-3. Digital Display Samples



Interactive Kiosk

Source: StreetsLA, 2021.

Source: StreetsLA, 2021.

Urban Panel

Source: StreetsLA, 2021.

Transit Shelter

All display units would be compliant with accessibility requirements of the ADA, PROWAG, and Title VI, as applicable. In specific locations, displays and devices may have multi-lingual features, audio (i.e., voice annunciation) capabilities, tactile keypads, and Braille to accommodate persons with disabilities. All digital displays would be electronically connected and would automatically report their operating status to the content management system (CMS). This is to allow direct control of the displays, their functions, and display content; and timely maintenance of all devices to ensure they remain in working order and automatically report required maintenance, damage, and needed replacement to StreetsLA's existing Asset Management Program.

Through a network of digital-ready elements and digital panels, the STAP aims to accelerate the provision of the following public benefits and services:

- Transit real time information, wayfinding, and emergency messaging
- Integration of localized advertising (i.e., ability to connect transit users and pedestrians with local products and merchants), online support, and other targeted advertising
- Using technological innovations for increased safety and security
- Appropriate messaging in the context of the surrounding environment and community standards
- Expanded universal access through messaging in multiple languages and delivery methods, such as audio and tactile messaging systems for visually impaired persons

2.4.4 Advertising Content Display

Advertisements under the STAP shall comply with the City's advertising policy, which is currently in draft form and would be adopted prior to execution of the STAP contract. The purpose of the policy is to control the content of advertisement placed on the public ROW, structures, facilities, and rolling stock to ensure subject matter is aligned with the standards of the community. It covers commercial and promotional advertisements, governmental advertisements, and public service announcements, but it would not allow political advertisements (e.g., political parties and election campaigns), public issues and debates (e.g., economic, political, religious, or social issues), and prohibited products, services, and activities (e.g., alcohol, tobacco, adult/mature content, false or misleading materials, unlawful and illegal activities). The contractor would remove any advertising that StreetsLA determines to be objectionable or conflicts with the City of Los Angeles' Advertising Policy. Removal would take place as soon as possible, but no later than 24 hours from the time of notification to the contractor.

Aside from real-time control of commercial and governmental advertisements on digital displays at the shelter locations, the CMS of the STAP would also provide the City with the ability to immediately post public service announcements at no cost.

The City would be establishing a digital (i.e., changeable electronic) display policy and related code adjustments to support the STAP. The policy would include parameters for controlling panel brightness relative to ambient light levels, flip rates/rate of turnover in signage, and static (motion-free) and silent displays to avoid driver distractions. Related to the forthcoming digital display policy, the City would also be developing parameters to guide the placement and siting of digital display panels to provide protections that would maintain the existing character of single-family neighborhoods and adherence to community aesthetics. Specifically:

- STAP would follow the Out of Home Advertising industry standard for illumination levels, which require digital displays to not exceed 0.3-foot candles over ambient light levels.
- STAP elements would follow established standards based on light levels measured an average of 12 feet from the display, and brightness would be automatically controlled according to the time of day and weather conditions.
- While billboards feature 6- to 8-second reads because the content is read by a motorist traveling at higher rates of speed upwards of 60 miles per hour (mph) (allowing for only a maximum 7-second read), the flip rates may be commensurately slower for street furniture. With street furniture, pedestrians and bus riders are walking, so the flip rate can and should be slower. Motorists who may take the time to read STAP displays are traveling on arterials at an average speed of 30 to 35 mph, which is approximately half the velocity of highway speeds. The flip time on STAP digital screens should be no more frequent than every 10 seconds, allowing for a maximum of six ads/messages over a 60-second cycle.

2.4.5 Shelter Revitalization Program

To expedite delivery of shelter, shade, safety, and comfort, STAP's Shelter Revitalization Program would refresh up to 664 of the existing shelters and redistribute them during the initial program years based on the rollout priority established by data and equity-driven criteria on a temporary, interim basis to provide a more immediate expansion of shade and shelter until such time the refreshed transit shelters may be replaced by new transit shelters as part of the STAP rollout process.

All refreshed/revitalized transit shelters would carry no commercial advertising space. The panels and space previously used for advertising on the reused elements would instead be used for the display of public art and local information. Public art and information programs would be coordinated with the communities where the rehabilitated elements are to be installed. The engagement of these neighborhoods would include meaningful outreach to community and faith-based organizations, schools, social service providers, and other stakeholders to ensure the revitalized elements reflect unique neighborhood characteristics.

2.4.6 Other Elements

Other STAP street furniture elements considered as optional at this time include shade structures, docks and/or corrals for scooters or bicycles, bollards, pillars, public art, electric vehicle charging stations, hydration stations, handwashing stations or hand sanitizer dispensers, cooling stations, traffic barriers, 5G, and public Wi-Fi. No set numbers for these additional, optional street furniture components have been established or their size or configuration determined, and there is no certainty that they will be part of the STAP during the initial 3-year rollout of the program.

It is anticipated that additional site work would be required at many of the existing transit shelter sites that would be receiving shelters and most of the new transit shelter sites to ensure compliance with ADA and PROWAG accessibility requirements.

2.5 Project Implementation Features

Site construction and deployment of the transit shelters under STAP are anticipated to occur over a 3- to upwards of a 6-year time span, from 2022 to 2024 or 2027, depending on the negotiated terms of the final contract. It is anticipated that during the initial program years, approximately 664 existing transit shelters would be upgraded, with a similar number of transit shelters refurbished and reinstalled at new locations. STAP would provide upwards of 1,116 new transit shelters at bus stops currently absent such amenities, in addition to the existing 1,884 shelters that would be replaced as part of the STAP rollout process. Any existing furniture not reused/reinstalled would be disposed of or salvaged for recycle content. At the end of the deployment period, the City would have upwards of 3,000 new transit shelters. As many as approximately 200 to 300 urban panels and other optional program elements may also be installed in parallel with the transit shelters during the latter half of the rollout process and beyond.

Maintenance and operation of all transit shelters, existing and new, would be the responsibility of the contractor for 10 years with two potential 5-year extensions, in accordance with the agreements with the City. In summary, program implementation would include the following activities:

- Dismantling and removing existing transit shelters and amenities
- Refreshing several existing shelters and construction of new transit shelters
- Maintaining the revitalized and new transit shelters
- Installing urban panels at or within the vicinity of the transit shelters
- Installing other optional program elements at or within the vicinity of the transit shelters

This section provides an overview of various elements to be performed to implement the STAP.

2.5.1 Construction Equipment

Construction equipment associated with implementation of the project under all scenarios would typically include power tools (e.g., concrete cutting saws, circular saws, drills, impact drivers), electric, compressed air or hydraulic jack hammer, a skid steer loader, backhoe, 5- to 10-cubic yard dump truck, flat-bed trailer, boom truck, and hand tools. This equipment would be in use from 2 to 8 hours per day.

2.5.2 Construction Crew

It is estimated that a crew of three to seven construction workers would be needed for each of the major actions of either physically dismantling an existing transit shelter or installing a refurbished or new shelter.

2.5.3 Hours of Construction

Work would generally occur from 7:00 a.m. to 4:00 p.m., Monday through Friday (8 hours per day). On occasion, work may take place on a Saturday between 8:00 a.m. and 5:00 p.m. In select locations, work hours may be reduced to accommodate rush-hour restrictions. It is anticipated that no construction would occur on Sundays or holidays. (See General Conditions 00210 and Los Angeles Municipal Code Section 41.40.)

2.5.4 Site Access, Traffic Circulation, and Parking

All STAP elements would be installed to ultimately provide a clear path of travel with a minimum 5-foot width to allow pedestrian circulation. Placement of new STAP elements would maintain minimum distance requirements from bus stops, rail station entrances, building/property ingress/egress points, fire hydrants, stand pipes, building fire safety equipment, below-ground utilities and related structures, power outlets, utility/street light/traffic signal poles, utility cabinets/above-ground facilities, signs/sign posts, street trees and tree wells, landscaped planters and/or parkways, driveways, access ramps, and other permitted street improvements.

Sidewalk, curb, and lane closure is expected to last for approximately 2 hours per transit shelter removal site. For purposes of installing transit shelters, it is expected that intermittent closure of a sidewalk, curb, and/or traffic lane would occur over a 2.5-day period, with 1 day projected to get the shelter site prepared and 1.5 days to physically install and make the shelter operational. No curb-lane closure(s) would generally be allowed during peak traffic periods (i.e., the hours of 6:00 a.m. to 9:00 a.m. and 4:00 to 7:00 p.m.); occasional exemptions to peak traffic hour restrictions may be sought on a case-by-case basis to accommodate installation schedules. Bus stop operations may temporarily be relocated to the opposite side of a typical intersection, next nearest stop, or suspended during activities to either dismantle or install a shelter. No parking is anticipated to be affected by any STAP work.

2.5.5 Landscaping and Lighting

Where possible, STAP elements are intended to enhance or take advantage of tree canopies that provide natural shade and shelter. No trees are proposed to be removed with implementation of the STAP program elements under most instances. However, there may be situations where tree root pruning that is required to make sidewalk repairs necessary to achieve ADA compliance may destabilize an existing street tree beyond a reasonable level of liability and, thus, may likely require the removal of such tree to minimize public safety risks and to bring liability levels down to an acceptable level. When the installation of a transit shelter brings with it the possibility that a street tree may have to be removed, the contractor would have to comply with existing City regulations, including the need for a street tree removal permit from the Board of Public Works; public notification of the proposed removal of three or more street trees; a Board of Public Works public hearing for consideration of removal of three or more street trees at a specific address; and provision of replacement trees on a 2:1 basis with 24-inch box size tree stock to be watered for a minimum 3-year period.

As part of the Green New Deal, StreetsLA began to add cooling features, trees, and more shade at bus stops in October 2019. A coordinated effort between the STAP and other City efforts to achieve LA's Green New Deal goals would be undertaken.

The project would comply with pertinent City's ordinances related to lighting. All transit shelters would come equipped with evening-hour security lighting to illuminate passenger waiting areas beneath the shade structures/canopies. Shelter roofs may be equipped with solar panels or green roofs in limited quantities depending on need and/or appropriateness. Other optional shelter features may include free Wi-Fi, charging ports or stations, and possibly cooling systems.

As discussed above, motion on digital screens would not be allowed, and limitations would be placed on their brightness. Digital elements would have ENERGY STAR ratings for efficiency with light-emitting diode (LED) screens. These devices would automatically control their brightness in response to the time of day and sunlight. All elements of STAP would also be controlled through a CMS, which would automatically adjust the brightness of specific devices by location to match the allowable increase over ambient light levels (i.e., not to exceed 0.3-foot candles).

2.5.6 Utilities/Utility Coordination

Subsurface utility work associated with the installation of new STAP elements would primarily be coordinated with the City's Department of Water and Power and the Bureau of Street Lighting to provide electrical power and water services that may be necessary for STAP program elements. STAP installation efforts would also be coordinated with any other utilities or subgrade infrastructure that may be located in the City's ROWs. Certain water and power system connections may be necessary within roadway and sidewalk areas to accommodate new project components, such as shelter lighting, digital displays, and hydration stations.

No new utility boxes or power line relocations are required for the removal of existing transit shelters. It is anticipated that any existing shelter to be replaced with a new shelter would utilize the existing electrical service. New electrical service would be required for the new shelter locations. However, it is anticipated that existing electrical circuits and water service lines would be used; therefore, no utility line upgrades are anticipated.

2.5.7 Code Compliance

STAP program elements would comply with all applicable Structural, Seismic, Plumbing, and Electrical Codes, and other specific City-adopted policies and standards applicable to work on public ROWs. This includes compliance with DPW Standard Specifications, Standard Specifications for Public Works Construction, City amendments to the Standard Specifications for Public Works Construction (Brown Book), and various Standard Plans.

2.5.8 Operation and Maintenance

Maintenance of all STAP elements would be performed in accordance with performance-based contract maintenance standards that take into account historical data, including public comments and complaints received by the City's 311 Center, STAP web forms, crowd-sourced information, and data collected by StreetsLA's Asset Management Program.

The maintenance of program elements would include cleaning, removing graffiti and stickers, and removing litter in, on, and around each element. All transit shelter and associated street furniture amenities and digital devices would be maintained and kept in good working order by the removal of dust, grime, dirt, stickers, tags, and etchings. The digital technologies would possess a self-reporting feedback loop to alert the StreetsLA's Asset Management System of the need for repair, refurbishment, reconditioning, or replacement, and periodic onsite visual inspections by City staff would be used in tandem to ensure all STAP elements are properly maintained.

2.6 Construction and Implementation Scenarios

The three scenarios described below are developed for illustrative purposes to represent the most frequent STAP activities and include dismantling, removal, and relocation of existing transit shelters (Scenario 1) and placement of new shelters at new locations/bus stops that currently do not have transit shelters (Scenario 2). An additional scenario (Scenario 3) was developed for a programmatic analysis of program elements that relate to operation and maintenance activities of transit shelters and associated sidewalk furniture and amenities. These scenarios are representative of various configurations, depending on the conditions of each site. All components described below would not occur at each project location.

2.6.1 Shelter Dismantling and Removal

Under the STAP, the existing (1,884) transit shelters are slated to be dismantled and removed from their current locations over a 3- to 6-year time horizon beginning in 2022. Of these, up to 664 shelters are expected to be refurbished and redistributed during the initial program years to provide a more immediate expansion of shade and shelter at bus stops currently absent such amenities until such time the refreshed transit shelters may be replaced by new transit shelters as part of the STAP rollout process.

Any combination of the following activities would be required for this construction scenario:

- Dismantling and removing existing transit shelters, kiosks, and associated amenities
- Temporarily or permanently disconnecting and properly capping utility services to existing transit shelters, kiosks, and associated amenities for safety and future access where needed
- Transporting shelter components to a relocation/assembly site, recycling center and/or appropriate disposal facility
- Refurbishing shelters and other street furniture removed from existing shelter sites
- Preparing the site, including removal of existing sidewalks, foundations, and re-establishment of utility connections as needed

The dimensions of most existing transit shelter structures are approximately 5 feet by 13 feet and up to 9 feet in height, with an attached or detached bench and litter receptacle(s). For impact analysis purposes, it is estimated that approximately 10 square feet of the existing shelter area would be disturbed with the maximum of 0.5-foot excavation depth required. The excavation volume of soil and debris of approximately 5 cubic feet would be removed for disposal at the local landfill. The shelter's electrical components would be disposed of separately. Any steel or aluminum shelter components would be salvaged and recycled.

As stated above, it is estimated that the average time to take down and transport an existing shelter would range between 2 and 3 hours, with one of these hours reserved per day for traffic lane management. A crew of three to five staff would be needed at each dismantling operation. Intermittent lane closure or curb restrictions would be required. No streets would be completely closed to vehicular traffic during the transit shelter dismantling process, but traffic flag persons and/or devices may need to be in place during the dismantling period to protect vehicles, bicycles, and pedestrians if adequate width for deployment of the equipment is not otherwise available. Bus stops would need to be temporarily relocated or suspended. No parking impacts are anticipated.

2.6.2 Shelter Construction and Installation

A total of 1,116 new transit shelters would be constructed at designated locations, at existing bus stops without transit shelters, and the existing 1,884 transit shelters would be replaced. The dimension of each new structure would be approximately 5 feet wide, 14 to 20 feet long, and up to 9 feet tall. It would be equipped with seating, illumination for security and safety, and provide a separate stand-alone litter/recyclable receptacle.

Construction and installation of each new transit shelter would include any combination of the following activities:

- Installing refurbished and renewed transit shelter or a new transit shelter at a bus stop that previously had a shelter or amenities
- Installing refurbished and renewed transit shelter or a new transit shelter at a location that did not previously have a shelter or amenities
- The following program elements may be provided in the area adjacent to the shelter canopy:
    - Litter/recycling receptacles, digital displays, interactive information kiosks, vending kiosks, urban panels, and eLockers
- Any of the following elements may also be incorporated within or in the vicinity of transit shelters:
    - Shade structures; docks and/or corrals for scooters or bicycles; bollards; pillars; traffic barriers; electric vehicle charging stations[3]; hydration stations; handwashing stations or hand sanitizer dispensers; cooling stations; public Wi-Fi and Broadband 5G; charging ports or stations; public art and features that reflect local and/or architectural history
- Sidewalk reconstruction related to the installation of new or replacement transit shelters[4], including fixing broken concrete, cracks, and making required accessibility improvements such as cross-slope work for ADA compliance
- Minor utility work, such as underground or overhead utility connections, may be required

Each of the new and updated shelters would be equipped with a canopy, a bench, and a litter receptacle, with the size of the canopy varied. The City intends to incorporate

[3] Electric vehicle charging stations would be incompatible with bus stop zones where no parking is allowed; but it ***may*** be a program feature provided away from/outside of bus stop zones.

[4] The STAP would not be making comprehensive sidewalk repairs throughout a bus stop zone. ADA-related sidewalk reconstruction, in particular, would be limited to the area immediately beneath the transit shelter, transition areas needed to access the ADA-compliant area beneath a transit shelter, and an ADA-compliant Pedestrian Access Route (PAR) from the waiting area beneath a transit shelter to the ADA-compliant 5-foot by 8-foot boarding/alighting area adjacent to the bus stop sign post. Sidewalk panels disturbed by transit shelter installations would likely be repaired or replaced, but the scope of additional sidewalk repairs beyond that would be reviewed and determined on a case-by-case basis depending on the ability of the City to cover the costs of such work.

various amenities as part of STAP to take advantage of expanding innovations in transit and smart technology, including customized automated digitized advertising panels, some of which may be interactive with the capability of providing wayfinding, real-time bus arrival, and other public information. Media kiosks, approximately 4.5 feet by 2 feet wide and 8 feet tall, would each have two display panels containing a combination of digital graphics and/or static printed commercial advertising, wayfinding, bus arrival, or other public services message content that may either be incorporated into the transit shelter or installed as separate, stand-alone structures. Newsstand vending kiosks, public amenity kiosks, and urban panels may be included as part of the project. Installation of transit shelters and associated amenities may require sidewalk reconstruction.

For impact analysis purposes, it is estimated that the installation of each transit shelter would disturb an area of approximately 105 to 128 square feet (i.e., 7 to 8 feet by 15 to 16 feet); the excavation volume of soil and debris would range from a minimum 25 cubic feet to a maximum 220 cubic feet, depending on the shelter model and foundation; the maximum depth of excavation would be 3 feet. Construction would require temporary closure of the public sidewalk and temporary use of the public street in front of the bus stop/transit shelter site for up to 8 hours during each of the 2 to 3 days of construction because installation of transit shelters and associated amenities may require sidewalk reconstruction. A crew of three to seven workers would be needed to complete the work at each shelter site per day.

Intermittent lane closure or curb restrictions would be required over the approximately 2.5 days required to install shelters. No streets would be completely closed to vehicular traffic during the transit stop/shelter installation process, but traffic flag persons and/or devices may need to be in place during the installation period to protect vehicles, bicycles, and pedestrians if adequate width for deployment of the equipment is not otherwise available. All construction vehicles would be removed daily from the construction site location. Bus stops would need to be temporarily relocated or suspended. No permanent parking impacts are anticipated.

2.6.3 Shelter Operations and Maintenance

Maintenance of all program transit shelters and other amenities would be performed by the contractor on an ongoing basis over the 10-year period, with two optional 5-year extensions. The maintenance and operations activities would include any combination of the following:

- Cleaning of shelters, associated program elements, and sidewalk areas on a regularly scheduled (minimally twice per week) and emergency basis, including use of power-washing equipment
- Removal or abatement of graffiti and/or stickers
- Abatement of etching to the highest degree possible
- Litter and recyclable collection and disposal

- Shelter repair work, including fixing broken ad panels, inoperable lights, shelter structures, benches, litter receptacles, and other program elements
- Minor utility repair, such as replacing light elements, fuses, and utility box repairs
- Periodic repainting or recoating of transit shelters and their related components

A typical maintenance schedule is presented in Table 2-3.

Table 2-3. Typical Maintenance Schedule

Type of Maintenance	Description	Frequency	% of Total Inventory per Frequency
Preventive	Replacement of worn structural elements; original equipment manufacturer (OEM)-recommended maintenance of digital displays	Monthly or as needed	15%
Regular	Removal of graffiti, stickers, etchings, and tags; replacement of broken structural elements; cleaning of digital displays; removal of litter and debris	Minimally 2 times per week	100%
Hot Spots	All preventive and regular	Minimum of 3 times per week	Based on need
Deep Cleaning	Power washing to pads and program elements; painting or repairs to structural damage; removal and refurbishment of program elements	Rotating schedule: quarterly for power washing; additional power washing at specific locations as needed biannually or as needed for painting and all other repairs	Power washing: 100% Painting & all other repairs: 50%
Emergency	Replacement of broken glass; damaged structures, broken digital displays; safely secure and/or restrict access to furniture that cannot be repaired immediately to minimize liability concerns	Upon notification and no later than 24 hours after notification	100%

Source: StreetsLA, 2021.

2.7 Agency Approvals and Permits

Anticipated permits required to implement the STAP are listed in Table 2-4. All required permits and approvals from the appropriate City agency or department would be

obtained before any actions concerning the removal, rehabilitation, relocation, and installation of STAP elements are implemented. Placement of program elements in locations within jurisdiction of the California Coastal Commission or on State Highways controlled by the California Department of Transportation (Caltrans) would be obtained by the City's contractor for STAP on behalf of the City.

Table 2-4. Anticipated Permits and Approvals

Agency	Permit/Approval	Issue
Local		
City of Los Angeles, City Council	CEQA document and approval of STAP contractor	Adoption of MND and Mitigation Monitoring and Reporting Program (MMRP) and approval of STAP agreement with contractor
City of Los Angeles, Board of Public Works and City Council	List of transit shelter sites for new or upgraded program furniture	Approval of list of new or upgraded program furniture sites for the following year and blanket permit for implementing the program
City of Los Angeles, DPW, BOE	Engineering, Fabrication, and Installation Plan, specifications, and details adoption as “Standard Plans”	City’s contractor to go through and pay for the BOE “B-Permit” process to facilitate review and approval of plans, specifications, and details of STAP furniture to guide all program installations for quality assurance (QA)/quality control (QC) purposes and public safety
State		
California Coastal Commission	State Coastal Development Permit or other approval	City's contractor is responsible for obtaining any required coastal permit for project activities in the coastal zone.
Caltrans	Encroachment Permit or other approvals	City's contractor is responsible for obtaining any required permits or approvals for any work on the State Highway System

2.8 Future CEQA Review

The STAP program elements discussed above and that would be constructed and operated under the program have been subject to environmental analysis in this IS and would utilize this environmental document as part of its environmental clearance, in accordance with CEQA and the CEQA Guidelines.

Should the STAP be expanded to increase the number of new and upgraded transit shelters or other program changes, additional environmental review would be necessary, in accordance with CEQA. This may take the form of an Addendum or Subsequent IS that analyzes the impacts of the revised or added program elements and determines if new or more severe environmental impacts would occur. Alternatively, a

separate and independent environmental document may be prepared by the City, as appropriate.

3.0 ENVIRONMENTAL EFFECTS/INITIAL STUDY CHECKLIST

This section documents the screening process used to identify and focus on environmental impacts that could result from the project. The IS Checklist below follows closely the form prepared by the Governor's Office of Planning and Research and was used in conjunction with the City's 2006 CEQA Thresholds Guide and other sources to screen and focus upon potential environmental impacts resulting from the project. Impacts are separated into the following categories:

- **No impact.** This category applies when the project would not create an impact in the specific environmental issue area. A "No Impact" finding does not require an explanation when the finding is adequately supported by the cited information sources (e.g., exposure to a tsunami is clearly not a risk for projects not near the coast). A finding of "No Impact" is explained where the finding is based on project-specific factors, as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- **Less than significant impact.** This category is identified when the project would result in impacts below the threshold of significance and would therefore have less than significant impacts.
- **Less than significant impact with Mitigation incorporated.** This category applies where the incorporation of mitigation measures would reduce a "Potentially Significant Impact" to a "Less Than Significant Impact." The mitigation measures are described briefly along with a brief explanation of how they would reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be incorporated by reference.
- **Potentially significant impact.** This category is applicable if there is substantial evidence that a significant adverse effect might occur, and no feasible mitigation measures could be identified to reduce impacts to a less than significant level. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required. There are no such impacts for the project.

Sources of information that adequately support these findings are referenced following each question. All sources referenced are available for review at the offices of the BOE, 1149 South Broadway Suite 600, Los Angeles, California 90015. Please contact Norman Mundy at norman.mundy@lacity.org for an appointment.

The analysis in this document assumes that, unless otherwise stated, the project would be designed, constructed, and operated following all applicable laws, regulations, ordinances, and formally adopted City regulations and standards, including but not limited to:

- City of Los Angeles, City Council. Municipal Code. [LAMC] Available online at https://codelibrary.amlegal.com/codes/los_angeles/latest/overview

- City of Los Angeles, Department of Public Works, Bureau of Engineering. *Standard Plans*. [Standard Plans] Available online at https://eng2.lacity.org/techdocs/stdplans/index.htm
- American Public Works Association. Standard Specifications for Public Works Construction. [Green Book]
- American Public Works Association. *Work Area Traffic Control Handbook*. [WATCH]
- City of Los Angeles, Department of Public Works, Bureau of Engineering. *City's Additions and Amendments to the Green Book*. [Brown Book] Available online at https://eng2.lacity.org/brownbook/frame.cfm
- City of Los Angeles, Department of Public Works, Bureau of Engineering. Part M, Construction. [Construction Manual] Available online at https://eng2.lacity.org/techdocs/cons-man/

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) In non-urbanized areas, substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

An Aesthetics and Visual Impacts Analysis was prepared for the project and is provided in Attachment A. The findings of the study are summarized below.

3.1.1 Regulatory Setting

This section describes existing laws and regulations related to visual quality and aesthetics that are applicable to the project.

3.1.1.1 Federal

National Scenic Byways Program

The National Scenic Byways Program is implemented by the U.S. Department of Transportation, Federal Highway Administration (FHWA). The program was established to recognize, preserve, and enhance selected roads throughout the United States. It

designates roads with one or more archaeological, cultural, historic, natural, recreational, and scenic qualities as All-American Roads or National Scenic Byways. The Arroyo Seco Historic Parkway (State Route [SR] 110) from the SR-101/SR-110 interchange in Downtown Los Angeles to Colorado Boulevard in Old Town Pasadena is a Designated Scenic Byway under this program.

Visual Impact Assessment for Highway Projects

Federal visual assessment methodologies are established by FHWA's publication entitled Visual Impact Assessment for Highway Projects. This methodology divides the views into landscape or character units that have distinct, but not necessarily homogenous, visual character. Typical views, called key viewpoints, are selected for each unit to represent the views to/from the project. The view of the motorist is also considered as a separate character unit. Existing visual quality from the viewpoints is judged by three criteria: vividness, intactness, and unity.

3.1.1.2 State

California Scenic Highways Program

California's Scenic Highway Program was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. The California Streets and Highways Code, Division 1, Sections 260–263 implement the Scenic Highway Program. A highway may be designated scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the traveler's enjoyment of the view.

Caltrans defines a State Scenic Highway as any freeway, highway, road, or other public ROW that traverses an area of exceptional scenic quality. Eligibility for designation as a State Scenic Highway is based on vividness, intactness, and unity of the roadway. The status of a proposed State Scenic Highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval, adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a State Scenic Highway.

Within the City of Los Angeles boundaries, scenic roadways/highways are shown in Figure 3-1 and include:

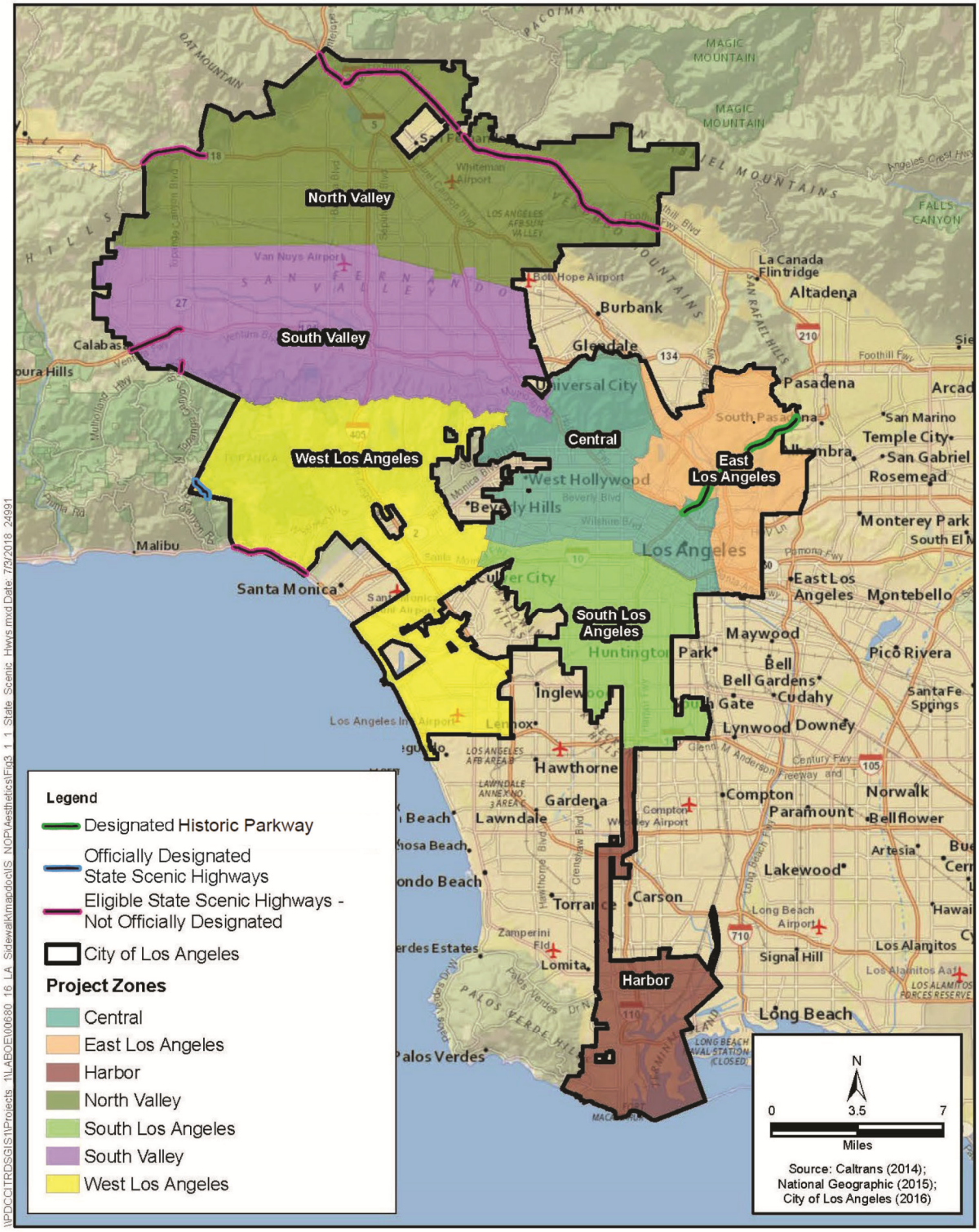
Officially Designated State Scenic Highway:

- SR-27 (Topanga Canyon Boulevard) between Pacific Coast Highway and Mulholland Drive

Designated Historic Parkway:

- Arroyo Seco (SR-110)

Figure 3-1. Scenic Highways within the City of Los Angeles



Highways eligible for designation as a State Scenic Highway:

- SR-118 (Simi Valley Freeway) west of DeSoto Avenue to the western City Limits
- I-5 north of SR-210 to northern City limits
- SR-210 in Sylmar/Sunland-Tujunga to eastern City limit
- US Highway 1: Pacific Coast Highway north of I-10 within City limits
- US 101: west of Topanga Canyon Boulevard to the western City limits

California Coastal Act

The *California Coastal Act of 1976* (Coastal Act) was adopted after the approval Proposition 20 in 1972. A key factor that led to the passage of this landmark legislation was the visible deterioration of the coastal environment, as well as development pressures from a growing population. Section 30251 of the Coastal Act is pertinent to visual resources preservation, stating that:

[S]cenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Caltrans SER Chapter 27

Chapter 27 of the Standard Environmental Reference (SER) provides an overview of the approach Caltrans uses to identify visual and aesthetic issues that may result from transportation projects. Information is provided to give the reader a basic understanding of the Visual Impact Assessment (VIA) and Scenic Resource Evaluation. These studies are used to predict the degree and type of impact proposed transportation projects would have on the "visual" environment. As part of the analysis, Caltrans has developed a decision tree and questionnaire that help determine the level of effort and analysis needed to properly analyze the project. Both the Decision Tree and a completed questionnaire for the STAP is provided in the Visual Memo prepared for the project (Attachment A).

3.1.1.3 Local

City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element, adopted in December 1996 and amended in August 2001, establishes the broad overall policy and direction for the entire General Plan. The Framework Element states that scenic resources are intended to improve community and neighborhood livability in the City. The Framework Element's open space and conservation policies seek to conserve significant resources and use open space to enhance community and neighborhood character.

City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan Conservation Element, adopted in 2001, includes a discussion of the existing landforms and scenic vistas in the City. Objectives, policies, and programs included in this element are intended to ensure protection of the natural terrain and landforms, unique site features, scenic highways, and panoramic public views as City staff and decision makers consider future land use development and infrastructure projects.

City of Los Angeles General Plan Mobility Plan

The City of Los Angeles General Plan Mobility Plan 2035, adopted in 2016, provides general guidance on mobility issues and goals for the City, but it can only provide guidance and not the same force as an adopted ordinance or approved specific plan. The Mobility Plan 2035 provides an inventory of City-designated scenic highways and includes special controls to be considered for protection and enhancement of scenic resources, as well as guidelines for designated scenic highways for which there is no adopted scenic corridor plan.

A complete list of City-designated scenic highways is provided in Aesthetics and Visual Impacts Analysis (see Attachment A): Inventory of Designated Scenic Highways and Guidelines. The Scenic Highway Guidelines indicate that Corridor Plans should be developed for all identified scenic corridors. These plans should address (in general):

- Roadway Design (must include consideration of safety and capacity, as well as preservation and enhancement of scenic resources)
- Earthwork and Grading
- Planting and Tree Preservation
- Signs/Outdoor Advertising
- Utilities

Specific to signs and outdoor advertising, the Mobility Plan indicates that only traffic, informational, and identification signs would be permitted within the public ROW of a scenic route as a Mobility Plan Guideline. Furthermore, the Mobility Plan endeavors to prohibit offsite outdoor advertising in the public ROW of designated scenic highways and on publicly owned land within 500 feet of the center line of a scenic highway as a related Mobility Plan Guideline. While this primarily appears to be focused on billboards and other signage structures viewable by motorists erected on properties outside of public ROWs, it is not implicitly specific to these roadside elements.

City of Los Angeles Municipal Code

Section 14.4.5 of the Los Angeles Municipal Code (LAMC) addresses hazards to traffic that may be caused by billboards or other signage erected on private property, and it states that a sign is not permitted if it constitutes a hazard to the safe and efficient operation of vehicles. It requires LADOT to prepare a hazard determination for such signs or those visible from or within 500 feet of the travelway to show that the sign will

not be a hazard before a sign permit is issued. The evaluation checklist that is used to determine hazards to traffic does not apply to billboards and digital displays permitted in Supplemental Use Districts, Specific Plans, and other sign districts in the City. In addition, these regulations govern the development of private properties and buildings and do not apply to signage and other improvements constructed within the public ROW.

LAMC Chapter VI provides regulations for public works and property, including streets and sidewalks. Section 62.200 identifies obstructions to driver visibility at street intersections and applies to signs and other improvements that may be constructed within the public ROW.

3.1.2 Existing Environment

The visual character of the City is defined by public views of natural features, such as topography/terrain, ocean, open space, trees and vegetation, and, particularly within urbanized areas, the built environment, including streets, buildings, and major infrastructure that form a substantial visual presence.

While the City of Los Angeles has a relatively flat terrain, the Santa Monica Mountains (along the western boundaries of the City), San Gabriel Mountains (around the northern boundaries of the City), Santa Susana Mountains (north of the Santa Monica Mountains), and Baldwin Hills (located southwest of Downtown Los Angeles) define the City's geography and serve as visual backdrops to urban development. Large open spaces are found in the Santa Monica and San Gabriel Mountain Ranges, along the beaches, rivers, and parks throughout the City, including Griffith Park, Cabrillo Beach, and Venice Beach, and scattered lakes and open water facilities. Urban development includes low-rise and high-rise buildings, older neighborhoods, newer developments, and infill developments, historical structures, architecturally significant structures, and major infrastructure.

Approximately 21 percent of the land area of the City is covered by streets. Included in this quantity are the sidewalks and associated streetscapes found adjacent to the roadway pavement. It is within these areas that the existing transit shelters and stops are located. Transit shelters on public roads are currently present at approximately 1,884 locations and include a combination of benches, shelters with or without advertising panels, trash receptacles, and at limited locations, bus stop safety lighting and real-time bus arrival information. Numerous other bus stops are only defined by bus stop signs[5] at the sidewalk.

The specific visual and aesthetics conditions for each transit shelter/bus stop can be very different and depend on many factors for a single assessment of visual character. Whether the street is a local, collector, or arterial road would affect the visual ratio of roadway to pedestrian area. Adjacent land uses, such as residential, commercial,

[5] Bus stop signs are solely provided by transit operators and are not part of any City transit amenity improvement program.

manufacturing, and office buildings, also have a huge determination on the visual character of the roadway environment where bus facilities are located, so no single definition or description can serve to address each and every existing condition where any one transit shelter is found.

The existing visual character for the locations of the STAP shelters and transit elements is typical for streetscapes (e.g., roadside elements, including sidewalks, signage, and potential roadside plantings in some locations, as well as street furnishings including benches and trash receptacles) and are typically associated with current bus stop locations. Larger locations include transit shelters, while smaller, less-frequented locations may only include a bench, trash receptacle, and signage. Images of existing transit shelters currently found in the City can be seen in Figure 3-2.

3.1.3 Impact Analysis

a) Would the project have a substantial adverse effect on scenic vista?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections A.1 and A.2); City of Los Angeles General Plan; Caltrans SER, Chapter 27; Aesthetics and Visual Impacts Analysis (Parsons, 2021).

Comment: A scenic vista provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. A significant impact may occur if the project either introduced incompatible visual elements within a public field of view containing a scenic vista or substantially altered a view of a scenic vista.

Less than significant impact. Currently, there is one designated scenic route within the City (SR-27 [Topanga Canyon Boulevard] between Pacific Coast Highway and Mulholland Drive) and one designated Historic Route (Arroyo Seco [SR-110; "Pasadena Freeway"]). Additionally, there are four routes that are identified as potentially eligible for listing as a State Scenic Highway. These scenic routes offer scenic views and vistas of the surrounding areas.

The current designated freeway routes do not have transit shelters or bus stops as part of their streetscape elements. As detailed in the project description, adding transit shelters to these roadways is not proposed, and in the case of the Arroyo Seco, which is a limited-access expressway, not feasible. Much the same is true for the potentially eligible freeway routes. In some cases, these are limited-access roadways, which would mean there is no pedestrian traffic and, therefore, no transit shelters on these routes.

Figure 3-2. Examples of Existing Transit Shelters/Bus Stops within the City of Los Angeles

As indicated in Table 2-2, Transit Shelter Zoning Siting Parameters, the new shelter locations would not be allowed in the frontage of properties along Federal and State Scenic Highways and would only have a limited allowance within existing commercial, manufacturing, and parking areas. This may occur along Pacific Coast Highway and Topanga Canyon Boulevard, subject to Caltrans approval. Given the limitations for shelter locations and the limited areas associated with any existing or proposed scenic route adjacent to commercial, manufacturing, and parking areas, any impact would be less than significant. No mitigation is required.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Reference: California Scenic Highway System List; L.A. CEQA Thresholds Guide (2006) (Section A.1 and A.2); City of Los Angeles General Plan; Caltrans SER, Chapter 27; Aesthetics and Visual Impacts Analysis (Parsons, 2021).

Comment: A significant impact may occur where scenic resources within a State Scenic Highway would be damaged by or removed for the project. For purposes of this analysis, scenic resources include trees, rock outcrops, and historic buildings.

Less than significant impact. Regarding the STAP and the interface with Scenic Routes, the program does not prohibit shelters from being located along scenic highways, but the City would review any proposed installation on an as-needed, case-by-case basis. However, the installation of any new advertising displays (i.e., static or digital) would not be placed on the frontage of properties along any identified Federal or State scenic highways. “Scenic Highways” as designated on the City’s General Plan and/or Mobility Plan would not be afforded the same limitations and/or prohibitions unless there is an adopted corridor plan for the roadway. Compliance with applicable Corridor Plans (Streetscape Plans) is discussed in Section 3.11.3.

As discussed above, locations for replacement and/or new shelters within existing or potential scenic routes is limited. Furthermore, shelters would be located within an existing sidewalk. Therefore, while transit shelters would change views from scenic routes, no visual impacts to existing trees, rock outcroppings, or historic buildings along these routes is anticipated.

STAP would comply with any adopted approved corridor plan with language that prohibits or limits the installation of advertising-based transit furniture (i.e., benches or shelters) within/upon any public ROW or street as designated in streetscape plans and corridor plans. For example, the Park Mile Specific Plan contains prohibitions against advertising-based transit shelters but does allow non-advertising transit shelters. Some existing transit shelters within the Park Mile Specific Plan were installed prior to the corridor plan adoption and are grandfathered in place. The Mulholland Scenic Parkway Specific Plan is another area/corridor where no program furniture would be placed due to its overall rural character and predominantly single dwelling unit land use designations of properties immediately adjoining Mulholland Highway on both sides of

the roadway along its entire length. The land use and planning section (Section 3.11) discusses compliance with adopted plans and policies in detail.

Impacts on scenic highways would be less than significant, and no mitigation is required.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Reference: L.A. CEQA Thresholds Guide (Section A.1); City of Los Angeles General Plan; Caltrans SER, Chapter 27; Aesthetics and Visual Impacts Analysis (Parsons, 2021).

Comment: A significant impact may occur if the project introduces incompatible visual elements to the project site or visual elements that would be incompatible with the character of the area surrounding the project site or conflict with applicable zoning and other regulations governing scenic quality.

Less than significant impact. Transit shelters are typical streetscape elements found along most major streets, including Boulevards, Avenues, and Collector Streets (including Hillside Collectors), within the City of Los Angeles. The project would replace the shelters with new shelters or potentially add new shelters in limited locations where demand warrants or existing stops are to be upgraded. On Local Streets, on the frontage of family dwelling units in most residential and agricultural zones, as well as within Hillside areas, the proposed transit shelters would not be allowed on the frontages of properties, as shown in Table 2-2, Transit Shelter Zoning Siting Parameters.

In some locations within the City, including within commercial, manufacturing, and parking areas, the shelters, including those with or without digital displays, would be allowed. Within areas of residential use, both one and multi-family, there would be limited allowance for new/replacement shelters, with or without advertisements or digital displays, at the frontage of properties in the R1, RU, RZ2.5, RZ3, RZ4, and RW1 (i.e., One-Family Residential) zones. Within the One-Family Residential Suburban (RS), limited placement could occur under the proposed designations, but within these locations, no advertising displays would be allowed on the frontage of one-family dwellings, although shelters with or without displays could be allowed elsewhere within the zoned area, including side yards and reverse frontage sidewalk areas. Areas with an Agricultural zoning would be treated the same as the RS zoning, with limited application of the new shelters in front of properties along Local Streets and Hillside Streets.

The new shelter placement would be targeted to areas with the greatest need for replacement, including:

- Areas of high transit ridership
- Areas with high exposure to heat/lack of shade
- Areas of equity focus: minority populations, low-income households and zero-vehicle households
- Areas with proximity to key destinations, service facilities, and trip generators
- Areas of low-frequency bus routes (areas with long wait times)
- Areas with site conditions and space to accommodate a shelter

Proposed Visual Character: The proposed character of a transit shelter under the STAP would include the same elements as the current transit shelters, with benches, trash receptacles, signage and advertising, but it could also include additional elements, depending on the location and the needs associated with that location, such as information kiosks, display maps of the system, or scooter rentals. Images of a proposed shelter for larger and smaller locations can be seen in Figure 3-3.

Anticipated Changes in Character: While the elements of the existing and the proposed transit shelter sites are very similar, because there would likely be more proposed shelters than currently existing to provide more shade for the waiting transit users, these would be more visible to users and those traveling along the street, including vehicle drivers and pedestrians. Overall, the changes are anticipated to be small and similar to what is currently on City streets. Site-specific differences can be anticipated to vary, depending on the needs assessment for each site, with some sites including more elements than others. But these sites are also likely to already be larger because in both instances they are located in areas of higher transit use.

Viewer Analysis: On a project that covers so much area and so many possibilities, the definition of specific viewers could include a multitude of categories, depending on the fineness of the approach. However, given this overall look, the categories can be grouped by user types, and while this approach would likely have overlap between viewers, it provides an adequate breakdown of the issue and concerns most relevant.

- Local Residents: Residents from areas surrounding the potential transit shelter sites can be expected to have a high concern and a high degree of sensitivity to changes in the visual environment with regard to the project and its effect on views from their homes, shops, and businesses.
- Business Owners, Employees, and Customers: This group is usually more concerned with maintaining access and visual exposure to the businesses than with the specific change in the visual environment. Businesses immediately at a transit stop may have a greater sensitivity depending on the size and number of elements at the proposed stop but may also view the increased foot traffic around their businesses as a benefit. Overall, the sensitivity of these viewers would be considered low.

Figure 3-3. Examples of Proposed Transit Shelters

A. Photos taken during daytime hours of Demonstration of Technologies organized by StreetsLA in July 2021.
(A larger transit shelter is shown above, and smaller transit shelters are shown below)

Figure 3-3. Examples of Proposed Transit Shelters

B. Photos taken during nighttime hours of Demonstration of Technologies organized by StreetsLA in July 2021.

Transit Users and Pedestrians: Because this group has a greater exposure time to the changes to the visual environment, they tend to be more sensitive to these changes. However, given that the changes are associated with upgrading the quality of the existing furnishings along the road, it could be anticipated that these changes would be viewed favorably.

- Drivers: Drivers along the road are foreseen to have a lower sensitivity level to the proposed changes along the roadside expected by the change in transit furnishings. Although their exposure time is more limited than the pedestrian and transit users time, and motorists have a clear view of the proposed new transit stop elements, transit furnishings of the size and nature proposed by STAP visually blend in with other street border improvements and competing signage, especially along street corridors with commercial or industrial developments fronting the roadside areas.

It is important to note that as in all things aesthetic, “beauty is in the eye of the beholder;” therefore, this or any visual analysis has a subjective component, and the generalizations that are developed for any one viewer group do not describe any one individual’s perceptions of visual changes. Instead, this analysis looks at the broad themes that these groups use to perceive the visual environment they are experiencing.

It is anticipated that the proposed new shelters are similar in size and scale to existing ones, so in this aspect the new shelters would be similar enough in appearance and use to not affect the overall streetscape of the City’s roadways. In some locations, additional or replacement elements may be included with the shelter, such as digital display panels and interactive kiosks. The digital display panels may replace the current static display panels already existing in most shelters. Stand-alone interactive kiosks may be placed in addition to the shelter and, if provided, may create a bigger footprint to the overall transit stop but would be limited to areas of high transit usage associated with commercial, retail, and manufacturing locations.

Because some of the proposed shelters are replacing existing shelters and the use of advertising would occur in areas where advertising already exists on the transit shelter or in the vicinity of the shelter, the visual impact associated with the proposed replacement shelters is anticipated to be less than significant. Where no shelter currently exists, but new shelters are proposed, the impact would still be anticipated to be less than significant because these are standard streetscape elements throughout the City of Los Angeles, and they may replace existing bus stop elements such as signage and benches that currently exist in these locations. Impacts related to changes in visual quality would be less than significant, and no mitigation is required.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Reference: L.A. CEQA Thresholds Guide (Sections A.1 and A.4); City of Los Angeles General Plan; Caltrans SER, Chapter 27; Aesthetics and Visual Impacts Analysis (Parsons, 2021).

Comment: A significant impact would occur if the project caused a substantial increase in ambient illumination levels beyond the property line or caused new lighting to spill over onto light-sensitive land uses such as residential, some commercial and institutional uses that require minimum illumination for proper function, and natural areas.

Light impacts are typically associated with the use of artificial light typically during the evening and nighttime hours. Glare can be either a daytime or nighttime occurrence caused by the reflection of sunlight or artificial light from reflective surfaces, such as window glass. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades that are largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

Less than significant impact. STAP would introduce or add new sources of lighting at approximately 3,000 transit shelter locations through shelter lighting, urban panels, and digital displays (see Figure 3-3B above). Industry standards for illumination levels for digital displays are not to exceed 0.3-foot candles over the ambient light levels. STAP illumination levels would not exceed this maximum. Therefore, the anticipated light levels associated with the digital displays would be fractionally higher than the current lighting levels at the bus stops. The Design Standards and Guidelines, Bureau of Street Lighting, DPW, City of Los Angeles (2007), indicates the illumination levels for a typical bus stop within the City is 2.5-foot candles on average. Based on this Bureau of Street Lighting standard, the illumination levels for the digital displays may be no more than 2.8-foot candles on average.

To study the potential effects of light levels that could be anticipated with the new shelter scenario, the following analysis was conducted by StreetsLA staff. Light meter readings were taken during the STAP Demonstration of Technologies to compare the illumination levels of an existing Boulevard transit shelter with compact fluorescent lamp (CFL) back-lit media panels and a built-in CFL overhead security light from our current shelter inventory, with the prototypical transit shelter provided for the STAP Demonstration of Technologies that is equipped with LED digital media displays and built-in LED overhead security lighting. It also provided a comparison of light output and levels of glare that could potentially be experienced by motorists from the existing CFL backlit media panels and the newer proposed LED digital screens/media panels.

See the Aesthetics and Visual Impact Analysis in Attachment A for more details. The light readings show that in almost all cases the general illumination of the proposed shelters with LED digital media display panels and LED security lights were generally equivalent to or less than the existing shelter with static CFL backlit displays. Of the three shelters measured, the proposed Tranzito's shelter had illumination levels that were generally less than those of the existing CFL back-lit shelters and OFMJCD prototype Paris shelter presumably because of the smaller 65-inch LED digital media displays and the lack of a secondary LED digital display beneath the roof canopy, as the OFMJCD prototype Paris shelter had. The recorded light meter readings indicate that the newer shelters do not produce significantly higher levels of illumination

compared to an existing CFL-illuminated transit shelter; as mentioned above, light levels of the transit shelters equipped with digital media displays were equivalent to or less than light levels of the existing CFL-equipped transit shelters.

Because most bus stops are located along roadways with street lights, the resulting increase in lighting levels would be a small increase over existing conditions and is not expected to create light spillover or glare impacts. Furthermore, because streetlighting is currently existing, the digital displays would not represent a substantially new source over the ambient lighting by the streetlights. Impacts related to new sources of light and glare would be less than significant, and no mitigation is required.

3.2 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project				
a) 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) 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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒

3.2.1 Regulatory Setting

This section describes existing laws and regulations related to agriculture and forestry resources that are applicable to the project.

3.2.1.1 Federal

There are no federal regulations that specifically address impacts related to agriculture, although there are designated National Forests near the City designated for permanent preservation as open space.

3.2.1.2 State

Farmland Mapping and Monitoring Program

The California Farmland Mapping and Monitoring Program (FMMP) tracks California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status, with the best quality land designated as Prime Farmland. Other farmland designations include Farmland of Statewide Importance, Unique Farmland, Grazing Land, Farmland of Local Importance, and Farmland of Local Potential. Urban and Built-Up land includes land occupied by structures at a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.

California Land Conservation Act/Williamson Act

The California Land Conservation Act of 1965 or Williamson Act allows local governments to enter into contracts with private landowners restricting the conversion of agricultural land or open space use to urban land uses within a set time frame. In turn, landowners pay lower property tax assessments (based on farming and open space uses as opposed to full market value).

3.2.1.3 Local

City of Los Angeles Zoning Regulations

Chapter 1, Article 2 of the LAMC contains the City's Zoning Regulations. Areas zoned as A1 and A2 Agricultural Zones allow farming, nurseries, aviaries, and apiaries, as well as the keeping of livestock.

3.2.2 Existing Environment

Under the FMMP, most of the City is designated as Urban and Built-Up land, with small, scattered areas of Other Land, Water, Grazing Land, Farmland of Statewide Importance, and Farmland of Local Importance. The Farmland of Statewide Importance consists of small agricultural fields, and the Farmland of Local Importance are generally plant nurseries along major infrastructure ROWs. While there are agricultural uses in the City, these lands are not under Williamson Act contracts.

The Angeles National Forest is located at the San Gabriel Mountains, north of the City, and the Los Padres National Forest is located at the Santa Susana Mountains, northwest of the City. There are no City sidewalks at the Angeles National Forest and Los Padres National Forest.

3.2.3 Impact Analysis

a) 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?

Reference: California FMMP.

Comment: A significant impact may occur if the proposed project would result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use.

No impact. The STAP program elements would be located at sidewalk areas and would not affect adjacent agricultural uses or land designated as Farmland. No conversion of Farmland to other uses would occur with the STAP. The project would have no impact on designated Farmlands. No mitigation is required.

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

Reference: City of Los Angeles Zoning Regulations and Zoning Map; California Department of Conservation Williamson Act Program.

Comment: A significant impact may occur if the proposed project were to result in the conversion of land zoned for agricultural use, or indicated under a Williamson Act contract, from agricultural use to a non-agricultural use.

No impact. The STAP program elements would be located at sidewalk areas and would not affect adjacent lands zoned as A1 or A2. In addition, no agricultural land under a Williamson Act contract would be affected by the project. No conflict with the zoning or agricultural use of adjacent lands would occur with the STAP. The project would have no impact on an agricultural zone or a Williamson Act contract. No mitigation is required.

c) Would the 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))?

Reference: US Forest Service National Forest Locator Map.

Comment: A significant impact would occur if the project conflicts with existing zoning or causes rezoning of forest land or timberland.

No impact. The STAP program elements would be located at sidewalk areas in the City and would not be located within the Angeles National Forest or Los Padres National Forest. The STAP would not conflict with the zoning of land within the National Forests or timberland. No impact would occur, and no mitigation is required.

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

Reference: United States Forest Service National Forest Locator Map.

Comment: See comment above.

No impact. The STAP does not propose any transit shelters in the Angeles National Forest or Los Padres National Forest. No conversion of forest land to other uses would occur with the project. No impact to forest land would occur, and no mitigation is required.

e) 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 non-forest use?

Reference: California FMMP; US Forest Service National Forest Locator Map.

Comment: See comment above.

No impact. The STAP program elements would be located at sidewalk areas and would not lead to the conversion of adjacent lands to other uses. No impacts on agriculture and forest resources related to land conversion are expected, and no mitigation is required.

3.3 Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

An Air Quality and Greenhouse Gas Emissions Analysis Technical Memo was prepared for the project and is provided in Attachment B. The findings of the memo related to air quality are summarized below.

3.3.1 Regulatory Setting

This section describes existing laws and regulations related to air quality that are applicable to the project.

3.3.1.1 Federal

Clean Air Act

The federal Clean Air Act (CAA) is the comprehensive federal law that regulates air emissions to protect public health and welfare. The United States Environmental Protection Agency (EPA) is responsible for implementation and enforcement of the CAA, which establishes federal National Ambient Air Quality Standards (NAAQS), specifies future dates for achieving compliance, and requires EPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS.

The six principal pollutants for which NAAQS have been promulgated include: ozone (O_3), respirable and fine particulate matter (PM_{10} and $PM_{2.5}$, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them. The NAAQS are listed in Table 3-1.

Table 3-1, Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Ozone (O_3)	1-hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8-hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM_{10})	24-hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter ($PM_{2.5}$)	24-hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	12 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1-hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8-hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1-hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1-hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment
	3-hour	0.5 ppm (1,300 µg/m^3)	—		
	24-hour	0.14 ppm (365 µg/m^3)	0.04 ppm (105 µg/m^3)		
	Annual	0.03 ppm (80 µg/m^3)	—		
Lead (Pb)	30-day average	—	1.5 µg/m^3	Partial Non-Attainment[e]	Attainment
	Rolling 3-month average	0.15 µg/m^3	—		

Table 3-1, Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Sulfates	24-hour	—	25 µg/m^3	—	Attainment
Hydrogen Sulfide (H_2S)	1-hour	—	0.03 ppm (42 µg/m^3)	—	Unclassified

ppm = parts per million by volume

µg/m^3 = micrograms per cubic meter

[a] *An ambient air quality standard is a concentration level expressed in either ppm or µg/m^3 and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.*

[b] *Ambient Air Quality Standards based on the 2016 Air Quality Management Plan (AQMP).*

[c] *"Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.*

[d] *California and Federal standard attainment status based on South Coast Air Quality Management District's (SCAQMD) 2016 AQMP and 2018 updates from the California Air Resources Board (CARB). https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.*

[e] *An attainment redesignation request is pending.*

Sources: EPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed June 8, 2021; CARB, Ambient Air Quality Standards May 4, 2016, https://ww3.arb.ca.gov/research/aaqs/aaqs2.pdf. Accessed June 8, 2021.

3.3.1.2 State

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. The California Air Resources Board (CARB) is responsible for coordination and administration of State and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table 3-1 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State.

California Code of Regulations

The CCR is the official compilation and publication of regulations adopted, amended, or repealed by the State agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in

Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing more than 10,000 pounds) during construction shall be limited to 5 minutes of any location. In addition, Section 93115 in Title 17 of the CCR states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

California Air Toxics Program

The California Air Toxics Program was established to address potential health effects from exposure to toxic substances in the air. CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment to reduce public exposure to diesel particulate matter (DPM) and other toxic air contaminants (TACs). The California Air Toxics Program is supplemented by the Assembly Bill (AB) 2588 Air Toxics "Hot Spots" program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce the risks through implementation of a risk management plan.

CARB Regulations

CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. Statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed by State agencies. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

3.3.1.3 Regional

South Coast Air Quality Management District Air Quality Management Plan

The South Coast Air Quality Management District (SCAQMD) is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin (SCAB). To meet the NAAQS and CAAQS, SCAQMD has adopted a series of Air Quality Management Plans (AQMP), which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the NAAQS and CAAQS in a timely manner. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O_3 and $PM_{2.5}$ are met, and that public health is protected to the maximum extent feasible. It is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with CARB and EPA. The AQMP also incorporates the transportation strategy and transportation control measures from the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS).

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and State air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2016 AQMP for the SCAB, are based on the 2016–2040 RTP/SCS. On September 3, 2020, SCAG's Regional Council adopted the 2020–2045 RTP/SCS. The 2020–2045 RTP/SCS was determined to conform to the federally mandated SIP for the attainment and maintenance of NAAQS standards. CARB accepted SCAG's determination that the SCS met the applicable State greenhouse gas (GHG) emissions targets. The 2020–2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

SCAQMD Air Quality Guidance Documents

SCAQMD published the CEQA Air Quality Handbook to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses. SCAQMD is currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook. While this process is underway, SCAQMD has provided supplemental guidance on its website.

SCAQMD has published a guidance document called the Final Localized Significance Threshold (LST) Methodology for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project. SCAQMD adopted additional guidance regarding $PM_{2.5}$ emissions in a document called Final Methodology to Calculate Particulate Matter $(PM)_{2.5}$ and $PM_{2.5}$ Significance Thresholds. The latter document has been incorporated by SCAQMD into its CEQA significance thresholds and Final LST Methodology.

SCAQMD Rules and Regulations

SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the SCAB and to help achieve air quality standards for land use development projects that include, but are not limited to, the following:

- Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions, and breakdown events. The following is a list of rules that apply to the project:
    - Rule 401 – Visible Emissions: This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than 3 minutes in any 1 hour, which is as dark or darker in shade as that

designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.

- Rule 402 – Nuisance: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- Rule 403 – Fugitive Dust: This rule requires projects to prevent, reduce, or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m_3$) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Measures include maintaining freeboard in haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, a contingency plan may be required if determined by EPA.

- Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit TACs or other non-criteria pollutants. The following rule may apply to the project:
  - Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials (ACM), any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM.

3.3.1.4 Local

City of Los Angeles General Plan Air Quality Element

The City of Los Angeles General Plan Air Quality Element sets forth the goals, objectives, and policies that guide the City in its implementation of its air quality improvement programs and strategies. Several of these goals, objectives, and policies relate to land use development and traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

Plan for a Healthy Los Angeles

The City of Los Angeles General Plan's Plan for a Healthy Los Angeles (Health and Wellness Element) lays the foundation to create healthier communities for all residents

in the City. As an element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment (i.e., improved ambient and indoor air quality), the opportunity to thrive, and access to health services, affordable housing, and healthy and sustainably produced food.

Transportation Control Measures

The City is responsible for implementation of transportation control measures as outlined in the AQMP. The City can fund infrastructure that contributes to improved air quality through capital improvement programs. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces the implementation of such mitigation measures.

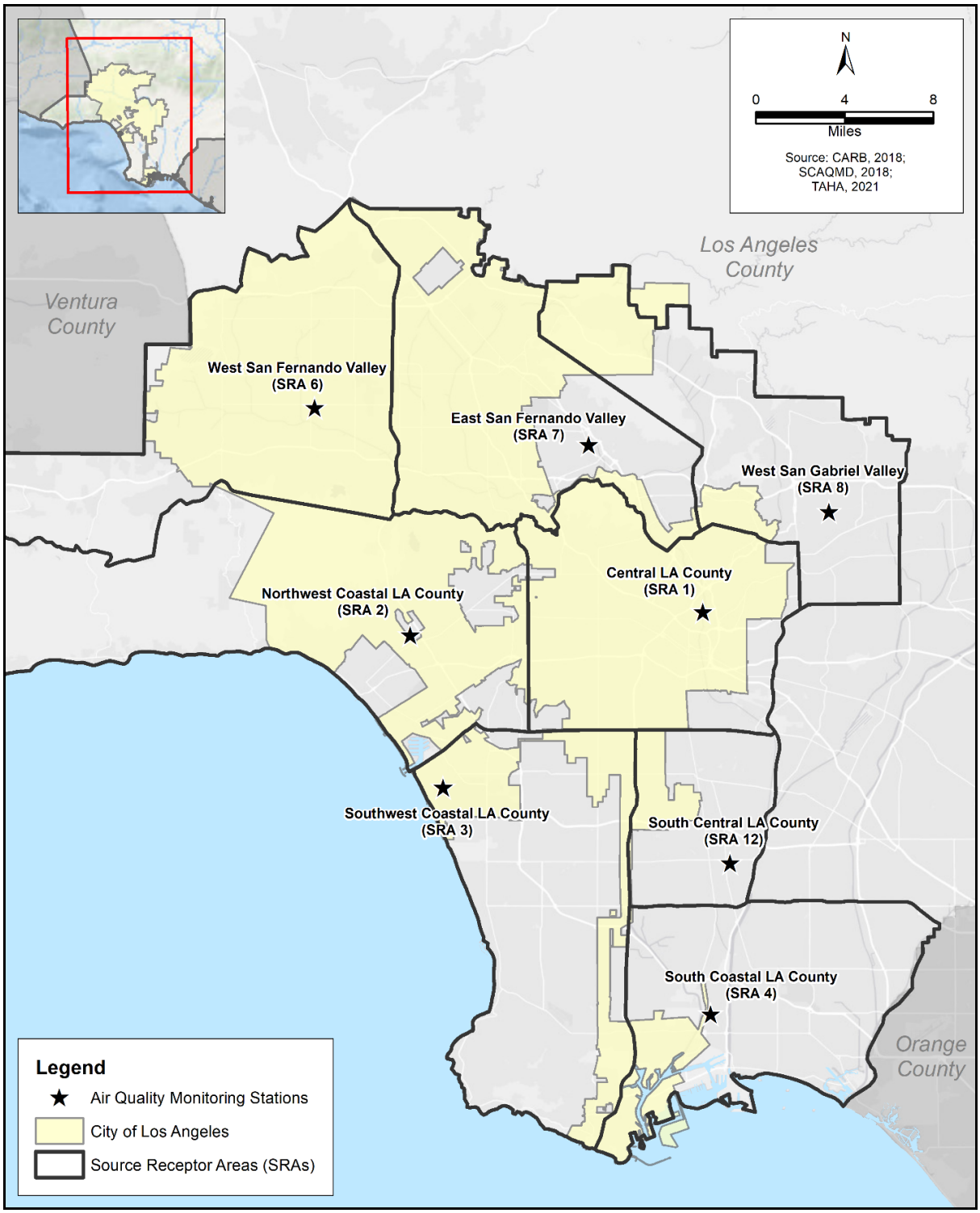
3.3.2 Existing Environment

The City of Los Angeles is located within the SCAB, where pollutant concentrations vary with location, season, and time of day. Over the past 30 years, substantial progress has been made in reducing air pollution levels in southern California. However, the SCAB still fails to meet the State and/or national standards for O_3, PM_{10}, and $PM_{2.5}$. In addition, Los Angeles County still fails to meet the national standard for Pb.

SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin and has divided the SCAB into 38 source receptor areas (SRAs) in which 31 monitoring stations operate. The City is located within 8 SRAs, as shown on Figure 3-4. Air quality concentrations monitored within the City demonstrate that State and/or national standards have recently been exceeded for O_3, PM_{10}, and $PM_{2.5}$.

The City lies within an area that is presently designated nonattainment of the NAAQS for O_3, $PM_{2.5}$, and Pb (pending possible reclassification to attainment), and is designated nonattainment of the CAAQS for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment designations represent an ongoing cumulative impact associated with the emissions of these air pollutants within the Los Angeles County portion of the SCAB.

Figure 3-4. Air Quality Monitoring Stations



SCAQMD's Multiple Air Toxics Exposure study (MATES-IV) concluded that the average carcinogenic risk from air pollution in the SCAB is approximately 420 in 1 million over a 70-year duration. Mobile sources (e.g., cars, trucks, trains, ships, aircraft) represent the greatest contributors. Approximately 68 percent of the risk is attributed to DPM emissions; approximately 21 percent to other toxics associated with mobile sources, including benzene, butadiene, and carbonyls; and approximately 11 percent of all carcinogenic risk is attributed to stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses, such as gas stations and chrome plating. The estimated cancer risk for the vast majority of the urbanized area, including the City, within the SCAB ranges from 200 to more than 1,200 cancers per million over a 70-year duration.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups as most likely to be affected by air pollution: children less than 14 years of age, the elderly (over 65 years of age), athletes, and people with cardiovascular and chronic respiratory diseases. According to SCAQMD, sensitive receptors are land uses where populations that are more susceptible to the adverse effects of air pollution exposure are likely to spend considerable amounts of time. The City is generally a dense urban environment that includes land uses sensitive to air quality emissions. The SCAQMD and CARB guidance recommend that sensitive receptor locations to be taken into consideration include residences, schools, playgrounds, child-care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

3.3.3 Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections B.1 to B.3); State CEQA Guidelines (2021) (Appendix G); Los Angeles General Plan Air Quality Element; SCAQMD's CEQA Air Quality Handbook (1993); SCAQMD AQMP; SCAG RTP/SCS (2020); Air Quality and Greenhouse Gas Emissions Analysis (TAHA, 2021).

Comment: A significant impact may occur if the project is inconsistent with or would obstruct implementation of the Air Quality Element of the City's General Plan, the AQMP, and the SCAG RTP/SCS.

Less than significant impact. In accordance with the procedures established in SCAQMD's CEQA Air Quality Handbook, the impact discussion should address the following criteria to determine whether the project is consistent with applicable SCAQMD and SCAG planning objectives:

1) Would the project create any impacts related to air quality violations, such as:
    - An increase in the frequency or severity of existing air quality violations;

- Causing or contributing to new air quality violations; or
- Delaying timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2) Would the project exceed the assumptions utilized in preparing the AQMP:

- Is the project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
- Does the project incorporate mitigation measures to reduce potentially significant impacts; and/or
- To what extent is project development consistent with the AQMP land use policies and control measures?

Criterion 1. Air quality violations occur when facilities are out of compliance with applicable SCAQMD rule requirements, permit conditions or legal requirements, or with applicable state or federal air pollution regulations. Implementation of the project would not introduce a new permanent, stationary source of air pollutant emissions that would constitute a facility capable of contributing to air quality violations.

Construction

As shown in Table 3-6 below, increases in regional and localized PM_{10} and $PM_{2.5}$ emissions during construction would not exceed the SCAQMD-recommended regional thresholds or LST values corresponding to the daily disturbance area and proximity of sensitive receptors to the shelter sites. Additionally, the project's maximum potential daily nitrogen oxide (NO_X) and CO emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard near the transit shelter sites. As shown, regional and localized emissions of NO_X and CO would not exceed the SCAQMD-recommended LSTs. Therefore, project construction would not result in a significant impact with regard to air quality violations.

Operations and Maintenance

Future project operations would not introduce a new permanent, stationary source to the City that would have the potential to exacerbate air quality violations. As shown in Table 3-8 below, the operational and maintenance activities would not produce emissions of any air pollutant in excess of the regional or localized SCAQMD thresholds. Project operations would be similar in nature to those maintenance activities occurring under existing conditions. The project's operational VMT would be distributed throughout the 468.7 square miles of the City, and maintenance operations would not concentrate heavy-duty vehicle activity in any particular location or area. Operation of the project would not have the potential to exacerbate air quality violations in the SCAB, and this impact would be less than significant.

Criterion 2. The second indicator of AQMP consistency is assessed by determining potential effects of permanent facility operations on population, housing, and employment assumptions that were used in the development of the AQMP and the RTP/SCS. If implementation of the project would render the assumptions invalid by introducing growth within the SCAQMD jurisdiction that exceeds projections incorporated into the AQMP, a significant air quality impact may occur.

Construction

Construction of the project would not introduce new growth in population, housing, or employment in the City. Construction personnel would be employees of either the contractor or the City. In addition, the construction phase of the project would last approximately 3 to 6 years, and would involve the use of 3 to 7 workers for a period of 2 to 3 days per shelter during the construction period. The increase in the number of maintenance workers is estimated at less than 50 workers and would not induce significant population growth in either the City or in southern California. This would not create permanent growth in population, housing, or employment within the City or within SCAQMD jurisdiction.

Therefore, construction of the project would not have any influence on the assumptions that were incorporated into the AQMP and the RTP/SCS. This impact would be less than significant during construction. No mitigation is required.

Operation and Maintenance

Operation of the project would expand existing maintenance operations throughout the City to service 3,000 transit shelter locations. Although project operations are anticipated to increase existing maintenance activities by as much as 60 percent, the additional service would not induce new population or housing growth to the City. Operational and maintenance personnel would be employees of either the contractor or the City. Furthermore, the emissions analysis presented in Table 3-8 (presented in the next section) demonstrates that operational emissions would not exceed any applicable SCAQMD threshold. Operation of the project would not have any effect on land use because it would not introduce any new permanent, stationary sources of emissions to the City. Therefore, the project would not conflict with the land use policies and strategies contained within the AQMP that are designed to reduce pollutant emissions, and this impact would be less than significant during future operation. No mitigation is required.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections B.1 and B.2); State CEQA Guidelines (2021) (Appendix G); SCAQMD AQMP; SCAQMD's CEQA Air Quality Handbook (1993); SCAQMD Regulations; Air Quality and Greenhouse Gas Emissions Analysis (TAHA, 2021).

Comment: A significant impact would occur if project activities resulted in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. Potential sources that may produce substantial pollutant concentrations include equipment and vehicle exhaust and earthwork activities.

Less than significant impact. Implementation of the STAP would generate air quality impacts during construction and maintenance activities. The SCAQMD guidance states that if construction or operation of a project would produce maximum daily emissions exceeding the applicable project-specific thresholds, those emissions would also be considered cumulatively significant.

SCAQMD established separate air quality significance thresholds for short-term construction activities and long-term operations for mass daily emissions of O_3 precursors and criteria pollutants expressed in pounds per day (lb/day). Table 3-2 presents the mass daily thresholds for construction activities and operation. A project may result in a significant air quality impact if maximum daily emissions generated by construction activities or future operations of a project were to exceed any applicable threshold.

Table 3-2. SCAQMD Regional Air Quality Significance Thresholds

Pollutant	VOC	CO	NO_X	SO_X	PM_{10}	$PM_{2.5}$
Construction						
Regional Threshold (lb/day)	75	550	100	150	150	55
Operation						
Regional Threshold (lb/day)	55	550	55	150	150	55

Source: SCAQMD, 2019.

In addition, SCAQMD developed LST values for pollutants that are specific to the SRA in which a project is situated for the following pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$. Table 3-3 presents the LST values for the applicable pollutants in each SRA spanned by the City for construction sites less than 1 acre in close proximity (80 feet) to sensitive receptors. For the purpose of conducting a conservative analysis, the most stringent LST values for each pollutant identified amongst the various SRAs spanned by the City are used to evaluate the localized air quality impacts associated with the onsite emissions generated by the construction activities. These most stringent LST values are also shown at the bottom of Table 3-3.

Table 3-3. SCAQMD Localized Significance Thresholds – Construction

SRA	SRA Name	CO (lb/day)	NO_X (lb/day)	PM_{10} (lb/day)	$PM_{2.5}$ (lb/day)
1	Central Los Angeles County	680	74	5	3
2	Northwest Coastal Los Angeles County	562	103	4	3
3	Southwest Coastal Los Angeles County	664	91	5	3
4	South Coastal Los Angeles County	585	57	4	3
6	West San Fernando Valley	426	103	4	3
7	East San Fernando Valley	498	80	4	3
8	West San Gabriel Valley	535	69	4	3
12	South Central Los Angeles County	231	46	4	3
	Minimum	***231***	***46***	***4***	***3***

Source: SCAQMD 2009.

Construction

Table 3-4 presents a summary of the improvements that would occur during the 3-year construction schedule to achieve the 3,000 total transit shelters by completion of the third STAP year, as shown in the final column of the table.

Table 3-4. STAP Annual Construction Activities

Program Year	Existing Transit Shelter Sites Dismantled & Upgraded[/a/]	New Transit Shelter Locations	Total Annual Site Installations	Year-End Total Citywide Active Shelter Locations
1	770	664[/b/]	1,434	2,548
2	889 (557 new)[/c/]	226	1,115	2,774
3	889 (557 new)[/c/]	226	1,115	3,000
3-Year Totals	***1,884***	***1,116***	***3,664***[/d/]	**-**

/a/ Site upgrades involve dismantling and removing existing components and installing new elements.
/b/ The 664 new locations in STAP Year 1 utilize refurbished/recycled components of existing upgraded shelters.
/c/ Of the 889 upgrades in STAP Year 2/3, 332 are improvements at the Year 1 sites installed with recycled parts; thus, the 664 new locations using recycled parts from Year 1 are subsequently upgraded in Years 2 and 3.
/d/ 3,664 installations include the 664 sites that would be constructed using recycled parts and upgraded later.

Source: Air Quality and GHG Analysis, TAHA, 2021.

As shown, it is anticipated that the greatest number of transit shelter site improvements would occur during the first year of the STAP, with 664 locations being dismantled, removed, and revitalized/renewed. A similar number of new transit shelters would be constructed. Each dismantling and removal activity would take approximately 1 hour upwards to 3 hours at most, and each shelter installation would take approximately 2.5 days. CalEEMod was used to estimate the pollutant emissions that would be generated

by a single dismantling and removal scenario and during the site preparation and construction phases for the installation scenario.

Daily equipment and vehicle activity inventories were developed for the STAP dismantling/removal activities, site preparation activities, and shelter construction activities. It is anticipated that each dismantling and removal would take approximately 1 to 3 hours, each site preparation would take 1 full workday, and each shelter installation would occur over 1 to 1.5 workdays. The shelter site construction would occur in two phases, site preparation and components installation. It was assumed that half of the installation sites would be undergoing site preparation and the other half would be installing STAP components on the day of maximum construction activity. Table 3-5 presents a summary of the daily activity that was accounted for at each type of STAP construction site. In addition to the equipment shown, construction activities could also use jackhammers and electric power tools.

Table 3-5. STAP Site Daily Activities during 3-Year Construction Period

Activity	Crew Size	Equipment (Hrs.)	Vehicle (Miles)
Dismantling/ Removal	3-5 workers	Air Compressor (1) Generator (1) Skid Steer (1) Tractor/Backhoe (1)	Flatbed Trailer Truck (20) Boom truck (20) Dump Truck (20)/a/ 1 x Crew Vehicle (20)
Site Preparation	3-7 workers	Air Compressor (2) Generator (2) Skid Steer (4) Tractor/Backhoe (4)	Flatbed Trailer Truck (20) Boom truck (20) 2 x Dump Truck (20) 2 x Crew Vehicle (20)
Shelter Installation	3-7 workers	Air Compressor (2) Boom Hoist (2) Generator (2) Tractor/Backhoe (4)	Flatbed Trailer Truck (20) Boom truck (20) Concrete Truck (20) 2 x Crew Vehicle (20)

/a/ Analysis assumed that a dump truck would travel 20 miles in a day collecting debris from three sites, and that two dump trucks would be used to collect debris from the six dismantling/removal sites in the regional analysis.

Source: Air Quality and GHG Analysis, TAHA, 2021.

STAP construction activities would be occurring simultaneously at various locations throughout the City during the 3- to 6-year implementation period. Through collaboration with City staff, it was determined that as many as 18 construction crews would be deployed to shelter improvement sites on a daily basis. The regional emissions analysis therefore considered the collective emissions from construction activities at 18 sites as the worst-case daily emissions, consistent with the L.A. CEQA Thresholds Guide and the SCAQMD CEQA Air Quality Handbook.

Daily air pollutant emissions that would be generated under the worst-case daily STAP construction activities were estimated using the California Emissions Estimator Model (CalEEMod, Version 2016.3.2), which is based on outputs from Off-Road Emissions Inventory Program model (OFFROAD) and EMission FACtor (EMFAC) model, which

are emissions estimation models developed by CARB, and used to calculate emissions from construction activities, including off- and on-road vehicles, respectively.

Table 3-6 presents the daily emissions that would be generated at a single site during each phase of construction activities and the total regional emissions that would be generated from all sites combined, assuming there would be 6 of each activity occurring simultaneously at 18 different transit shelter sites.

Table 3-6. Project Construction Emissions

Construction Activity	Maximum Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition & Removal						
Onsite Emissions	0.1	0.9	1.2	<0.1	<0.1	<0.1
Offsite Emissions	<0.1	0.6	0.2	<0.1	<0.1	<0.1
Total	**0.1**	**1.5**	**1.4**	**<0.1**	**0.1**	**<0.1**
Site Preparation						
Onsite Emissions	0.3	2.5	3.3	<0.1	0.1	0.1
Offsite Emissions	<0.1	1.1	0.3	<0.1	0.1	<0.1
Total	**0.3**	**3.6**	**3.7**	**<0.1**	**0.2**	**0.1**
Shelter Installation						
Onsite Emissions	0.2	2.2	2.9	<0.1	0.1	0.1
Offsite Emissions	<0.1	0.7	0.3	<0.1	0.1	<0.1
Total	**0.3**	**2.8**	**3.2**	**<0.1**	**0.2**	**0.1**
Regional Analysis (6 of Each Activity)						
Maximum Daily Emissions	**4.3**	**48.0**	**49.9**	**0.1**	**3.2**	**2.1**
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Analysis						
Maximum Onsite Emissions	**0.2**	**2.5**	**3.3**	**<0.1**	**0.1**	**0.1**
Localized Significance Threshold/a/	-	46	231	-	4	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

/a/ LST screening values are based on minimum values presented in Table 3-3.
Emissions modeling files can be found in the Air Quality and GHG Analysis (Attachment B).

Source: Air Quality and GHG Analysis, TAHA, 2021.

As shown, construction of the STAP program elements would not generate emissions exceeding any applicable SCAQMD mass daily threshold at the regional or localized level. During construction activities, the idling of trucks would be limited to 5 minutes or less in any location in compliance with CARB and SCAQMD regulations. Installation of the shelter components would involve minimal activities that generate fugitive dust, as

sidewalk disturbance would not expose unpaved ground areas and there would not be any material stockpiling occurring that could generate windblown dust. Emissions of volatile organic compounds (VOC), NO_X, PM_{10}, and $PM_{2.5}$ would remain below the project-level thresholds; thus, they would not be considered cumulatively considerable. Compliance with SCAQMD regulations would also reduce fugitive dust at shelter construction sites. Therefore, construction activities associated with the project would not create significant impacts regarding cumulative air quality conditions, and no mitigation measures are required.

Operations and Maintenance

The primary sources of emissions during project operations would be vehicle trips for standard shelter services, emergency repairs, power-washing, and City inspections. Equipment used to complete power-washing and emergency repairs would also generate minor emissions that were accounted for in the analysis. Table 3-7 presents an overview of the daily operational and maintenance activities that would occur with implementation of the project, as well as proportional estimates of existing maintenance activities. It was assumed that each vehicle would travel 40 miles throughout the City.

Table 3-7. STAP Operation and Maintenance Activities

Service Type	Total Annual Site Visits	Average Daily Site Visits	Average Daily Vehicles	Total Daily VMT by Service
STAP Project Maintenance & Operations				
Standard Service Visit	364,000	1,400	40	1,600
Power-washing	14,000	54	6	240
Emergency Repairs	35,000	135	12	480
City Inspections	14,000	54	6	240
Existing Maintenance & Operations				
Standard Service Visit	227,500	875	25	1,000
Power-washing	8,750	34	3.75	150
Emergency Repairs	21,875	84	7.5	300
City Inspections	8,750	34	3.75	150

Source: Air Quality and GHG Analysis, TAHA, 2021.

The operational emissions analysis used CalEEMod to estimate daily air pollutant emissions that would be generated by the vehicle trips and power-washing activities with implementation of the project and under existing conditions. Table 3-8 presents the daily regional emissions that would occur during maintenance and operation of the project.

Table 3-8. Project Operations Daily Emissions

Operational Activity	Maximum Daily Emissions (Pounds per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Emissions Analysis						
Equipment Sources	0.8	5.6	7.2	<0.1	0.3	0.3
Mobile Sources	0.7	5.2	5.4	<0.1	2.1	0.6
Impact Analysis						
Daily Operational Emissions	**1.5**	**10.8**	**12.6**	**<0.1**	**2.4**	**0.9**
Regional Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Emissions modeling files can be found in the Air Quality and GHG Analysis (Attachment B).						

Source: Air Quality and GHG Analysis, TAHA, 2021.

As shown above, project operations would not generate daily pollutant emissions in excess of any applicable SCAQMD regional project-level threshold for operations. Specifically, emissions of VOC, NO_X, PM_{10}, and $PM_{2.5}$ would remain well below the project-level thresholds; therefore, they would not be cumulatively considerable. Future maintenance activities would result in a less than significant impact related to cumulative emissions of O_3 precursors and particulate matter, and no mitigation measures are required.

Additionally, maintenance activities would be ongoing during the 3- to 6-year project construction period. Therefore, the analysis also addressed the incremental change in daily air pollutant emissions that would occur from the combination of expanded maintenance operations and construction activities. The combined incremental change in daily air pollutant emissions was quantified as the additional maintenance emissions that would occur above the existing baseline summed with the maximum daily construction emissions. Table 3-9 presents the incremental change in maintenance emissions based on the additional project transit shelter locations combined with maximum daily construction emissions and compares the total to the SCAQMD regional mass daily threshold for operational emissions.

Table 3-9. Combined Daily Emissions

Source Activity	Maximum Daily Emissions (Pounds per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Scenario						
STAP Project Operations	1.5	10.8	12.7	<0.1	2.4	0.9
Existing Maintenance Operations	0.9	6.8	7.9	<0.1	1.5	0.6
Net Operations	***0.6***	***4.1***	***4.8***	***<0.1***	***0.9***	***0.3***
Maximum Daily Construction	4.3	48.0	49.9	0.1	3.2	2.1
Impact Analysis						
Daily Combined Emissions	**4.9**	**52.0**	**54.6**	**0.1**	**4.1**	**2.4**
Regional Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Emissions modeling files can be found in the Air Quality and GHG Analysis (Attachment B).						

Source: Air Quality and GHG Analysis, TAHA, 2021.

Results of the analysis demonstrate that maximum daily construction emissions combined with the incremental change in maintenance operations emissions would remain below the SCAQMD regional operational thresholds. Therefore, implementation of the project would not generate significant emissions from combined construction and operational activities. Impacts would be less than significant, and no mitigation is required.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections B.1 to B.3); State CEQA Guidelines (2021) (Appendix G); SCAQMD Air Quality Handbook; CARB Regulations; SCAQMD Regulations; OEHHA Guidance; Air Quality and Greenhouse Gas Emissions Analysis (TAHA, 2021).

Comment: A significant impact would occur if project activities would expose sensitive receptors to substantial pollutant concentrations. Potential sources that may produce substantial pollutant concentrations include equipment and vehicle exhaust.

Less than significant impact. Sensitive receptors are present throughout the City and include residences, schools, hospitals, long-term care facilities, and other land uses where individuals who are more susceptible to the adverse effects of air pollution (i.e., children, the elderly, those with pre-existing conditions) spend considerable amounts of time.

SCAQMD has established quantitative thresholds for exposure to TAC emissions. A significant air quality impact may occur if TAC emissions from construction or operation of a project were to result in a sensitive receptor being subjected to an increased carcinogenic risk of greater than 10 excess cancers per million (1×10^{-6}) or being exposed to a composition of TAC concentrations that collectively constitute a

noncarcinogenic Hazard Index (HI) greater than 1.0. Carcinogenic risk is expressed in terms of the incrementally increased likelihood of cancer in a population, and the HI is calculated by comparing TAC concentrations to reference values established through epidemiological studies.

Construction

Sources of TAC emissions associated with construction activities include heavy-duty diesel equipment and heavy-duty diesel trucks, which release DPM into the atmosphere through exhaust. In compliance with CARB and SCAQMD rules and regulations, all equipment would be maintained in accordance with manufacturer specifications to ensure the optimal operating conditions are met. Each individual shelter construction site would only be active for up to approximately 3 to 4 days. SCAQMD relies on risk assessment guidance published by Office of Environmental Health Hazard Assessment (OEHHA) to evaluate sensitive receptor exposures to TAC concentrations resulting from emissions sources. OEHHA guidance acknowledges that because carcinogenic risks are calculated over long timescales (30 years), it is not necessary to analyze potential TAC exposures when construction projects have a duration less than 2 months (OEHHA, 2015). The brief duration of construction activity at each shelter site and the limited intensity of construction equipment use given transit shelter site sizes and improvements would not pose carcinogenic risks to nearby sensitive receptors. In addition, the dismantling and removal of existing transit shelters or placement of new STAP elements could expose persons to asbestos or other hazardous materials during shelter removal and the excavation of underground utility pipes with ACM. Compliance with SCAQMD rules and other existing regulations on the removal, handling, and disposal of ACM would avoid the creation of health hazards. Therefore, the project would result in a less-than-significant impact related to construction pollutant concentrations. No mitigation is required.

Operations and Maintenance

Operation of the project would not introduce any new substantial stationary or mobile sources of TAC emissions within the City. Operational VMT related to maintenance would be spread at 3,000 transit shelters throughout the 468.7 square miles of the City and would not create mobile source emissions concentrated in any one location. Therefore, the project would result in a less-than-significant impact related to operational pollutant concentrations. No mitigation is required.

d) Would the project create objectionable odors affecting a substantial number of people?

Reference: L.A. CEQA Thresholds Guide (Section B.2); State CEQA Guidelines (2021) (Appendix G); SCAQMD CEQA Air Quality Handbook; CCR; Air Quality and Greenhouse Gas Emissions Analysis (TAHA, 2021).

Comment: A significant impact would occur if the project created objectionable odors during construction or operation that would affect a substantial number of people.

Less than significant impact. The potential for significant air quality impacts related to odors is addressed qualitatively in the context of compliance with SCAQMD Rule 402 (Nuisance). SCAQMD states that a significant air quality impact may occur if construction or operation of a project would result in a, "discharge from any source whatsoever [of] such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

Construction

Construction activities would not disturb sources of unexpected odors such as sewer lines, and project-related odors would be typical of most construction sites and transitory in nature. The demolition debris from disturbed sidewalks is not characterized by noxious odors. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Potential odors would be typical of most construction sites and impermanent in nature, ceasing entirely following the completion of construction activities. The intensity and magnitude of construction activities would not be sufficient to generate odors perceivable by a substantial number of people. Therefore, the project would result in a less-than-significant impact related to construction odors. No mitigation is required.

Operations and Maintenance

SCAQMD has identified the following land uses as sources of substantial operational odors: agriculture (farming and livestock), chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. Operational activities associated with the project would not involve processes and activities found at any of these facilities that are known to generate noxious odors. All trucks performing routine maintenance would be required to limit idling to less than 5 minutes at any given site, per Section 2485 of Title 13 of the CCR, which states that the idling of all diesel-fueled commercial vehicles (weighing more than 10,000 pounds) must be limited to 5 minutes at any location to minimize exhaust emissions. Therefore, the project would result in a less-than-significant impact related to operational odors. No mitigation is required.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on state or federally protected wetlands, including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

3.4.1 Regulatory Setting

This section describes existing laws and regulations related to biological resources that are applicable to the project.

3.4.1.1 Federal

Rivers and Harbors Appropriation Act

Under Section 10 of the *Rivers and Harbors Appropriation Act* (33 U.S. Code [U.S.C.] 408), the United States Army Corps of Engineers (USACE) is authorized to regulate any activity within or over any navigable water of the United States (WoUS). Section 14 of the Act provides that the Secretary of the Army may, on recommendation of the Chief of Engineers, grant permission for the alteration of a public work so long as that alteration is not injurious to the public interest and will not impair the usefulness of the work.

Endangered Species Act of 1973

Section 9 of the federal *Endangered Species Act* (ESA) protects species listed as Endangered and/or Threatened by the United States Fish and Wildlife Service (USFWS) and forbids any person to take an Endangered or Threatened species. Sections 7 and 10 of the Act may authorize incidental take for an otherwise lawful activity if it is determined that the activity would not jeopardize survival or recovery of the species.

Migratory Bird Treaty Act of 1918

The *Migratory Bird Treaty Act* (MBTA) prohibits the killing or transport of native migratory birds, or any part, nest, or egg of any such bird, unless allowed by another regulation adopted in accordance with the MBTA. Permits from USFWS and authorization for potential take under the MBTA is part of the ESA Section 7 consultation process.

Clean Water Act

The Clean Water Act (CWA) (in 33 U.S.C. 1251–1376) focuses on the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Discharges into WoUS are regulated under CWA Section 404. Section 303 of the Act requires states to submit water quality standards for inland surface and ocean waters for approval by EPA. Under Section 303(d), states are required to list waters that do not meet water quality standards and to develop action plans to meet total maximum daily loads. Section 304 provides for water quality standards, criteria, and guidelines. Section 401 requires activities that may result in any discharge into WoUS to obtain certification from the state to show compliance with the provisions of the CWA. Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredge or fill material) into WoUS. Section 404 regulates the discharge of dredge or fill material into WoUS, including wetlands. No discharge of dredged or fill material can be permitted if a practicable

alternative exists that is less damaging to the aquatic environment or if the Nation's waters would be significantly degraded, unless a permit from USACE is obtained.

3.4.1.2 State

California Endangered Species Act

The *California Endangered Species Act* (CESA) serves to conserve, protect, restore, and enhance Threatened or Endangered species and their habitats. It mandates that State agencies do not approve projects that would jeopardize the continued existence of Threatened or Endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. For projects that affect both a State- and federally listed species, compliance with the federal ESA will satisfy the CESA if the California Department of Fish and Wildlife (CDFW) determines that the federal incidental take authorization is consistent with the CESA under Section 2080.1 of the California Fish and Game Code.

California Fish and Game Code

The California Fish and Game Code establishes the Fish and Game Commission, which regulates the take of fish and game, not including the taking, processing, or use of fish, mollusks, crustaceans, kelp, or other aquatic plants for commercial purposes. The Commission's responsibilities include setting seasons, bag and size limits, and methods and areas of take, as well as prescribing the terms and conditions under which permits or licenses may be issued or revoked by CDFW. The Commission also oversees the establishment of wildlife areas and ecological reserves and regulates their use.

Sections 3503, 3503.5, 3505, 3800, and 3801.6 of the Fish and Game Code protect all native birds, birds of prey, and all nongame birds, including their eggs and nests, that are not already listed as fully protected and that occur naturally within the State.

CDFW manages native fish, wildlife, plant species, and natural communities and oversees the management of marine species in coordination with the National Marine Fisheries Services (NMFS) and other agencies.

Porter-Cologne Water Quality Control Act

The *Porter-Cologne Water Quality Control Act* (Porter-Cologne Act established the State Water Resources Control Board (SWRCB) and nine separate Regional Water Quality Control Boards (RWQCBs) to oversee water quality at the regional/local level. The RWQCBs regulate actions that would involve "discharging waste, or proposing to discharge waste, within any region that could affect the water of the state" (WoS). The RWQCB also regulates WoS under Section 401 of the CWA. A Water Quality Certification or a waiver must be obtained from the RWQCB if an action would potentially result in any impacts on jurisdictional WoS.

California Coastal Act of 1976

The California Coastal Act of 1976 declares the California coastal zone as a distinct and valuable natural resource and seeks to protect, maintain, and, where feasible, enhance

and restore the overall quality of the coastal zone environment and its natural and artificial resources; assure orderly, balanced utilization and conservation of coastal zone resources; maximize public access to and along the coast and maximize public recreational opportunities; assure priority for coastal-dependent and coastal-related development over other development; encourage state and local initiatives and cooperation for coordinated planning and development for mutually beneficial uses.

The Act outlines standards for development within the coastal zone and includes specific policies that address issues such as shoreline public access and recreation, lower cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works. The California Coastal Commission implements the Act and regulates the use of land and water in the coastal zone.

Section 30240 of the Act provides protections for Environmentally Sensitive Habitat Areas (ESHAs), several of which are located in the City. The Act states that development in areas adjacent to ESHAs shall be sited and designed to prevent impacts that would significantly degrade those areas, and shall be compatible with the continuance of the habitat areas.

3.4.1.3 Local

City of Los Angeles General Plan Conservation Element and Open Space Element

The City of Los Angeles General Plan Conservation Element addresses the need to conserve and protect natural resources and open space in the City. Natural resources addressed in this element include water and hydraulic force, forests, soils, rivers and other waters, harbors, fisheries, wildlife, and minerals. The Open Space Element addresses the preservation, conservation, and acquisition of open space in the City, including lands used for water supply, water recharge, water quality protection, wastewater disposal, solid waste disposal, air quality protection, energy production, and noise prevention.

City of Los Angeles Environmentally Sensitive Areas

LAMC Section 64.70.01 defines Environmentally Sensitive Areas (ESAs) as: "…any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which would be easily disturbed or degraded by human activities and developments. ESAs include, but are not limited to, areas designated as Significant Ecological Areas (SEAs) by the County of Los Angeles, areas designated as Significant Natural Areas by the California Department of Fish and Game's Significant Natural Areas Program and field verified by the Department of Fish and Game, and areas listed in the Los Angeles RWQCB's Basin Plan as supporting the 'Rare, Threatened, or Endangered Species (RARE)' beneficial use."

Preservation of Protected Trees Ordinance

The City's ordinance for the Preservation of Protected Trees (Ordinance No. 177,404), LAMC Section 46.00 *et seq.,* protects the following tree species:

- Oak tree including Valley oak *(Quercus lobata)* and California live oak *(Quercus agrifolia),* or any other tree of the oak genus indigenous to California but excluding the scrub oak *(Quercus dumosa)*
- Western sycamore *(Platanus racemosa)*
- California bay *(Umbellularia californica)*
- Southern California black walnut *(Juglans californica* var. *californica)*

The Ordinance applies only to non-planted trees, and it is typically not applicable to street trees, which are generally planted.

Board of Public Works Street Tree Removal Permit and Tree Replacement Condition Policies

LAMC Sections 62.161 through 62.176 authorize the Board of Public Works and its officers and employees to control the planting, maintenance, and care of trees, plants, and shrubs in all public ROWs in the City. The Board adopted the Street Tree Removal Permit and Tree Replacement Condition Policies to formalize existing City practice and designate the Bureau of Street Services, Chief Forester, as the authorized officer and employee to issue street tree removal permits; require public notification of the proposed removal of three or more street trees; require a Board of Public Works public hearing for consideration of removal of three or more street trees at a specific address; and require as a condition of a street tree removal permit that replacement street trees be provided on a 2:1 basis with 24-inch box size tree stock to be watered for a minimum 3-year period.

City of Los Angeles Tree Planting Ordinance

Ordinance No. 183474 amended Sections 61.162, 62.163, and 62.169 of the LAMC to clarify that the responsibility for planting and maintaining street trees and vegetation within City streets rests with the City, and further clarifies that a property owner in a residential zone may remove and plant vegetation within a parkway, but that street trees may not be removed without a permit.

3.4.2 Existing Environment

The City supports a wide variety of ecosystems, habitats, and native animal and plant species, along with common urban-adapted species. The existing transit shelter locations and future sites for new transit shelters are predominantly urban and developed and adjacent areas generally support ornamental vegetation, street trees, and paved sidewalk areas and roadways. These areas provide low-quality wildlife habitat, although nearby trees may provide suitable nesting and foraging habitat for common predatory and migratory bird species and urban-adapted species. Small

mammals may also utilize nearby vegetation and street trees and shrubs for shelter, foraging, roosting, and nesting.

Sensitive vegetation communities are present in large open space areas and undeveloped lands throughout the City. Table 3-10 lists sensitive communities that occur within the City by project zone.

Table 3-10. CDFW CNDDB Sensitive Communities that Occur within the City

Sensitive Community	Project Zone
California Walnut Woodland	South Valley
Riversidian Alluvial Fan Sage Scrub	North Valley
Southern California Arroyo Chub/Santa Ana Sucker Stream	North Valley
Southern Coast Live Oak Riparian Forest	North Valley, West Los Angeles, Central
Southern Coastal Bluff Scrub	Harbor
Southern Coastal Salt Marsh	West Los Angeles
Southern Cottonwood Willow Riparian Forest	North Valley, Central
Southern Dune Scrub	West Los Angeles
Southern Mixed Riparian Forest	North Valley
Southern Sycamore Alder Riparian Woodland	Central, North Valley, West Los Angeles
Valley Oak Woodland	North Valley
Walnut Forest	East Los Angeles

Source: City of Los Angeles, 2006.

The County of Los Angeles SEAs contain sensitive biological resources and important regional habitat linkages. There are 28 SEAs in Los Angeles County, 11 of which are located partly within the City: the El Segundo Dunes, Ballona Wetlands, Harbor Lake Regional Park, Palos Verdes Peninsula and Coastline, Griffith Park, Santa Clara River, Santa Monica Mountains, Simi Hills and Santa Susana Mountains, Tujunga Valley/Hansen Dam, Verdugo Mountains, and Terminal Island Pier 400.

The City's ESAs include vegetation communities, habitats, open space resources, and other habitats supporting one or more special-status species. These ESAs are the Chatsworth Reservoir, Simi Hills and Santa Susana Pass, Santa Susana Mountains, San Gabriel Mountains, Verdugo Mountains, Tujunga Valley/Hansen Dam Park, Tujunga Spreading Grounds, Santa Monica Mountains and Encino Reservoir, Santa Monica Mountains and Griffith Park, El Segundo Dunes, Ballona Wetlands and Ballona Creek, Palos Verdes Peninsula Coastline, Harbor Lake Regional Park, and other parks, reservoirs, and spreading grounds.

The ESHAs in the City include: (1) the Venice Coastal Zone, which includes the Ballona Lagoon and Grand Canal south of Washington Boulevard, the Venice Canals north of Washington Boulevard, habitat buffer areas on the east and west banks of Ballona Lagoon, and the California least tern nesting areas on Venice Beach and within the Port

of Los Angeles; and (2) the sand dunes west of Los Angeles International Airport, including the El Segundo Blue Butterfly Habitat Restoration Area.

Wildlife corridors and connectivity areas are primarily located along the Santa Monica Mountains, Santa Susana Mountains, San Gabriel Mountains, Verdugo Mountains, Simi Hills, and their associated foothill regions (including corridors between the Santa Susana Mountains and the Simi Hills and between the Simi Hills and the Santa Monica Mountains, and connections between the Santa Monica Mountains and the Verdugo Mountains and San Gabriel Mountains); within the Arroyo Seco, Santa Clara River, and Los Angeles River; and at large open spaces and parks, such as Griffith Park, Elysian Park, and Ernest E. Debs Regional Park. In addition, the City is situated along the Pacific Flyway, where numerous bird species travel and inhabit during their breeding season or stop over and pass through on their spring and fall migrations.

3.4.3 Impact Analysis

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan; USFWS Critical Habitat for Threatened & Endangered Species.

Comment: A significant impact may occur if the project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulation, or by the State or federal regulatory agencies cited.

Less than significant impact with mitigation incorporated. While there are sensitive communities, SEAs, ESHAs, ESAs, and designated Critical Habitats in the City that support candidate, sensitive, or special-status species, STAP program elements would be located on sidewalk areas that do not contain vegetation or habitat for sensitive biological resources. The disturbance area would be confined to a 6-foot by 15-foot area (90 square feet) at each transit shelter site. In addition, no street trees are proposed for removal or replacement by the STAP. Thus, new or upgraded transit shelters that may be located on the sidewalk areas of roadways in SEAs, ESHAs, and ESAs would not adversely affect sensitive biological resources. Should parkway areas be disturbed, these are expected to contain introduced landscaping materials that would not be considered sensitive species.

While there is potential for construction activities to occur adjacent to sensitive biological communities in SEAs, ESHAs, and ESAs, STAP program elements would be located at the sidewalk areas that do not contain sensitive biological resources. At existing and future transit shelter sites near areas and vegetation that may support nesting birds, construction activities could inadvertently disturb occupied/active nests. BIO-1, which requires compliance with the MBTA through the timing of construction

activities outside the bird nesting season or the conduct of bird nesting surveys to identify and protect active nests, would avoid impacts to migratory birds.

Mitigation Measures

BIO-1 Vegetation clearing and construction in areas near mature trees or potential habitat for nesting birds shall be conducted between September 1 and February 15. Otherwise, a Qualified Biologist shall conduct a preconstruction nesting bird survey to determine if any nesting birds are present within 50 feet of the work site. This survey will be conducted no more than 7 days before the start of construction. Should nesting birds be found, an exclusionary buffer will be clearly marked around each active nest site. Construction or clearing shall not be conducted within this zone until the Qualified Biologist determines that the young have fledged or the nest is no longer active.

Impacts on sensitive species and migratory birds would be less than significant after mitigation.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan; USFWS Critical Habitat for Threatened & Endangered Species.

Comment: A significant impact may occur if riparian habitat or any other sensitive natural community were to be adversely modified.

Less than significant impact. STAP program elements would be located on sidewalks and not in natural streams, riparian areas, drainage channels, coastal areas, sand dunes, or other sensitive natural communities and habitats. No direct impacts to riparian areas and natural communities would occur. Runoff during construction may enter into adjacent drainage channels, but implementation of best management practices (BMP) during construction, in accordance with the City's municipal separate storm sewer system (MS4) permit, would minimize pollutants in the stormwater that may affect water quality. Impacts on riparian areas would be less than significant, and no mitigation is required.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C)); City of Los Angeles General Plan; USFWS National Wetlands Inventory Wetlands Mapper.

Comment: A significant impact may occur if federally protected wetlands, as defined by Section 404 of the CWA, would be modified or removed.

Less than significant impact. STAP program elements would be located on sidewalks and not in wetland areas, such as rivers, creeks, coastal areas, or the Ballona Wetlands. As stated above, BMPs would be implemented during construction to minimize stormwater pollutants that may enter adjacent natural drainage areas, including wetlands. Impacts on wetlands would be less than significant, and no mitigation is required.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan.

Comment: A significant impact may occur if the project interferes or removes access to a migratory wildlife corridor or impedes the use of native wildlife nursery sites.

No impact. At the City's hillside areas and large open spaces that serve as wildlife corridors, STAP program elements would be located on sidewalk areas, which do not in themselves serve as wildlife corridors or support wildlife movement and wildlife nursery sites. In addition, new and upgraded transit shelters would not prevent wildlife movement through an area. Thus, no impact on wildlife movement would occur, and no mitigation is required.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan; Preservation of Protected Trees Ordinance; Street Tree Removal Permit and Tree Replacement Condition Policies; and Tree Planting Ordinance.

Comment: A significant impact would occur if the project caused an impact that was inconsistent with local regulations pertaining to biological resources.

Less than significant impact. STAP does not propose the removal of street trees, but there may be instances when new or relocated transit shelters would require street tree removal if tree root pruning needed to make sidewalk repairs ADA-compliant may destabilize an existing street tree beyond a reasonable level of liability and, thus, may likely require the removal of such tree to minimize public safety risks and to bring liability levels down to an acceptable level. When installation of a transit shelter brings with it the possibility that a street tree may have to be removed, the contractor would have to comply with the City's Preservation of Protected Trees Ordinance and Board of Public Works Street Tree Removal Permit and Tree Replacement Condition Policies, including a street tree removal permit from the Board of Public Works; public notification of the proposed removal of three or more street trees; a Board of Public Works public hearing

for consideration of removal of three or more street trees at a specific address; and provision of replacement trees on a 2:1 basis with 24-inch box size tree stock to be watered for a minimum 3-year period. The STAP would comply with the City's Preservation of Protected Trees Ordinance, Street Tree Removal Permit and Tree Replacement Condition Policies, and Tree Planting Ordinance. Any project in the City that affects street trees or protected trees would have to comply with these City regulations, as required. The project itself would not conflict with these policies and ordinances. Impacts would be less than significant with compliance with existing City regulations, and no mitigation is required.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Reference: L.A. CEQA Thresholds Guide (2006) (Section C); City of Los Angeles General Plan; CDFW NCCP Plan Summaries.

Comment: A significant impact may occur if the project would cause an impact that is inconsistent with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or local regulations pertaining to biological resources. A significant impact may occur if the project would be inconsistent with mapping or policies in any conservation plans.

No impact. There is no HCP or NCCP in the City, and the nearest HCP and NCCP to the City is Rancho Palos Verdes NCCP/HCP. Because no new or upgraded transit shelters are proposed in Rancho Palos Verdes or the planning boundaries of the Rancho Palos Verdes NCCP/HCP, no conflict with an HCP or NCCP is expected with the STAP. No impact would occur, and no mitigation is required.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

A Cultural Resources Study was prepared for the project and is provided in Attachment C. The assessment included a review of the Los Angeles County Built Environment Resources Directory (BERD), the Archaeological Determinations of Eligibility List for Los Angeles, along with the City's Historic-Cultural Monument (HCM) List, Los Angeles Office of Historic Resources Historic Preservation Overlay Zones (HPOZ), listing of properties in Los Angeles that are listed in the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR), California Historical Landmarks (CHL) list, and list of National Historic Landmarks (NHL) within the City utilizing SurveyLA. Because the project will be within the public ROW of existing paved streets and sidewalks and no native ground is visible, a field visit was not conducted. The findings of the memo are summarized below.

3.5.1 Regulatory Setting

This section describes existing laws and regulations related to cultural resources that are applicable to the project.

3.5.1.1 Federal

National Historic Preservation Act

The National Historic Preservation Act established the NRHP to recognize resources associated with the country's history and heritage. Criteria for listing on the NRHP pursuant to Title 26, Part 63 of the *Code of Federal Regulations* (CFR) are significance in American history, architecture, archaeology, engineering, and culture as presented in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that are either:

(A) Associated with events that have made a significant contribution to the broad patterns of our history

(B) Associated with the lives of persons significant in our past

(C) Embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction or

(D) Have yielded, or may be likely to yield, information important to history or prehistory

Criterion D is usually reserved for archaeological resources. Properties eligible for the NRHP must be of sufficient age, be proven through scholarship to meet at least one of the significance criteria, and exhibit integrity of the features, elements, and/or informational value that provides the property its documented historical or archaeological significance.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the excavation of archaeological sites on Federal and Indian lands in the United States, and the removal and disposition of archaeological collections from those sites. The Act aims to secure, for the present and future benefit of the American people, the protection of archaeological resources and sites on Federal and tribal lands. These resources are considered an irreplaceable part of the nation's heritage.

3.5.1.2 State

California Register of Historical Resources

The CRHR was created to identify historical resources deemed worthy of preservation on a State level and was modeled closely after the NRHP. The criteria are nearly identical to those of the NRHP but focus on resources of statewide, rather than national, significance. The CRHR automatically includes any resource listed, or formally designated as eligible for listing, on the NRHP. The State Historic Preservation Office (SHPO) maintains the CRHR, which may also include properties designated under local ordinances or identified through local historical resources surveys that meet CRHR eligibility criteria.

California Public Resources Code Section 5024.5

California PRC Section 5024.5 states: "(a) No state agency shall alter the original or significant historical features or fabric, or transfer, relocate, or demolish historical resources on the [agency's] master list..." This law also obligates State agencies to adopt prudent and feasible measures that will eliminate or mitigate any potential adverse effects a project may have upon a listed historical resource.

California Public Resources Code Sections 5097.5 and 5097.7

PRC Section 5097.5, as amended, and PRC Section 5097.7 strengthen existing State law regarding criminal penalties and restitution for crimes of archaeological site vandalism, theft of archaeological materials or artifacts in curation facilities, and damages to historic buildings and other cultural properties on State and local government land. The amendment and new section closely follow federal law, specifically the Archaeological Resources Protection Act, which regulates the excavation of archaeological sites and the removal and disposition of archaeological resources on federal and Indian lands.

PRC Chapter 1.7, Sections 5097 and 30244 include additional State-level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources from developments on State lands and define the excavation, destruction, or removal of paleontological "sites" or "features" from public lands without the express permission of the jurisdictional agency as a misdemeanor. As used in Section 5097, "state lands" refers to lands owned by, or under the jurisdiction of, the State or any State agency. "Public lands" is defined as lands owned by, or under the jurisdiction of, the State, or any city, county, district, authority, or public corporation, or any agency thereof.

California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097

California *Health and Safety* Code Section 7050.5, and PRC Sections 5097.94 and 5097.98 outline procedures to be followed in the event human remains are discovered during the course of development and other projects. If human remains are encountered, all work must stop at that location and the County Coroner must be immediately notified and advised of the finding. The County Coroner would investigate "the manner and cause of any death" and make recommendations concerning the treatment of the human remains. The County Coroner must make their determination within 2 working days of being notified. If the human remains are determined to be Native American, the County Coroner shall contact the California Native American Heritage Commission (NAHC). The Commission would in turn "...immediately notify those persons it believes to be most likely descended from the deceased Native American." The descendants would then inspect the site and make recommendations for the disposition of the discovered human remains. This recommendation from the most likely descendants (MLD) may include the scientific analysis of the remains and associated items.

3.5.1.3 Local

City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element addresses cultural resources, including significant archaeological, paleontological, and historical resources in the City, and proposes a means for avoiding potential impacts to known or potential cultural resources.

City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan Conservation Element includes goals, objectives, and policies requiring measures be taken to protect the City's historical, archaeological and paleontological resources for historical, cultural, research, and/or educational purposes. A policy requires that the City continue to identify and protect significant archaeological and paleontological sites and resources known to exist or that are identified during land development, demolition, or property modification activities.

City of Los Angeles Cultural Heritage Ordinance

The City's Cultural Heritage Ordinance (Los Angeles Administrative Code [LAAC] Section 22.171) defines an HCM as any site, building, or structure of particular historic of cultural significance. A resource is eligible for listing as an HCM if it meets specific criteria, as outlined in Article 4, Section 22.130 of the LAAC. The City maintains a list of all sites, buildings, and structures that have been designated as HCMs.

Historic Preservation Overlay Zone

LAMC Section 12.20.3 addresses the recognition, preservation, enhancement, and use of buildings, structures, landscaping, natural features, and areas within the City having historic, architectural, cultural or aesthetic significance through the designation of an HPOZ. The City has 35 HPOZs, with preservation plans and standards for the rehabilitation or restoration, additions, alterations, infill, and the form of single- and multi-family residential, commercial, mixed-use and other nonresidential buildings, structures, and public areas within the HPOZ. The preservation plan is used by the Historic Preservation Board in the review of projects in the HPOZ in terms of conforming work on contributing elements and noncontributing elements.

3.5.2 Existing Environment

Prehistory

Humans have lived in the southern California region for at least 10,000 years, and several chronologies divide different periods of habitation and development. The commonly used chronology divides this time span into the Early Period (8000 to 6000 Before Common Era (B.C.E.), the Milling Stone Period (6000 to 1000 B.C.), the Intermediate Period (1000 B.C.E to A.D. 1000), and the Late Prehistoric Period (A.D. 1000 to 1779). Different patterns and types of material culture define each of these periods.

Ethnography

Geographically, the City is in an area historically occupied by the Gabrielino (also known as Tongva). At the time of European contact, the Gabrielino inhabited the Los Angeles basin and the southern Channel Islands of Santa Catalina, San Nicolas, and San Clemente. Like many other Native American groups, the settlement of Europeans in California brought conflict and disease as the Spanish colonized the west coast, decimating the Native American population. Today, the Gabrielino continue their traditions in southern California, with approximately 2,000 individuals.

Cultural Resources

The City has designated more than 1,000 buildings and sites as individual local landmarks or HCMs. Archival research and analysis of the BERD, Archaeological Determinations of Eligibility List, HCM, HPOZ, NRHP, CRHR, CHL, and NHL identified 1,289 resources within the project area (see Attachment C). These include 60 built environment districts, 1,220 built environment resources, and 9 archaeological sites. The nine archaeological sites include one prehistoric trail, three historic-age (i.e., 50 years or older) sites, and five historic-age cemeteries or burial locations. Of the 1,289 resources, 1,074 are on the HCM List, 29 are HPOZs, 376 are on the NRHP, 162 are on the CRHR, 27 are listed CHL, and 13 are on the NHL. Several resources are included on more than one list.

Paleontological Resources

Geologic units that have produced fossil finds are generally considered to have the potential to yield similar resources. Thus, the potential for fossil resources does not depend on fossil finds within a certain distance of the project footprint but on fossil finds in the same geologic units affected by a project. Based on past finds, younger alluvium of Holocene age have low sensitivity for paleontological resources, while older alluvium of Pleistocene age and Alluvial deposits of Plio-Pleistocene and Pliocene age have high sensitivity for paleontological resources. Marine sedimentary and non-marine sedimentary bedrock of the Pliocene, Miocene, Oligocene, Eocene, Upper Cretaceous, and Jurassic age have high sensitivity, while Volcanic, Igneous, and Granitic bedrock of the Tertiary, Undated/Mesozoic/ Pre-Cenozoic, and Pre-Cambrian age have no potential for paleontological resources.

3.5.3 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations Section 15064.5?

Reference: L.A. CEQA Thresholds Guide (2006) (Section D.3); City of Los Angeles General Plan Conservation Element; Community Plans; HCM List; NRHP; CRHR, Cultural Resources Study (Paleo Solutions, 2021).

Comment: A significant impact would result if the project caused a substantial adverse change to the significance of a historical resource, as defined in PRC Section 15064.5. For historical resources, thresholds for a significant impact include the following:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

No impact. A total of 1,289 cultural resources within the City have been previously recorded and determined eligible for either local, California, and/or National resource registers. Of these, 1,280 are built environment resources or districts and 9 are archaeological sites.

All construction activities will be limited to the public ROW of existing streets and on sidewalks, causing no direct impact to the 1,280 built environment resources or districts within the City of Los Angeles. Given that transit shelter construction activities would be relatively minor and consistent with existing public transportation components, no indirect impacts to any of the built environment resources from noise, dust, or vibration are expected. In addition, the STAP does not have a federal nexus (not proposed on federal land or using federal funds); therefore, the provisions of the NRHP do not apply. No impact on historical resources would occur, and no mitigation is required. Compliance with the standards and guidelines for individual HPOZs is discussed in Section 3.11.3.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?

Reference: L.A. CEQA Thresholds Guide (Section D.2); City of Los Angeles General Plan and Community Plans; HCM List; NRHP; CRHR; Cultural Resources Study (Paleo Solutions, 2021).

Comment: A significant impact would occur if the project caused a substantial adverse change in the significance of an archaeological resource, which falls under the CEQA Guidelines Section 15064.5. A substantial adverse change is one that disturbs, damages, or degrades an archaeological resource or its setting.

Less than significant impact with mitigation incorporated. A total of nine archaeological sites within the City have been previously recorded and determined eligible for the local, California, and/or National resource registers. These include one

prehistoric trail, three historic-age sites, and five historic-age cemeteries or burial locations.

STAP program elements would be located within an urbanized area and have been subject to extensive disturbances from development activities and the construction and improvement of the existing roads and sidewalks. Under the STAP, proposed depths of excavation are 0.5 feet below ground surface (bgs) for shelter dismantling and removal and 3 feet bgs for the construction of new shelters and utility relocation. As a result of previous development activities, surficial archaeological resources that may have existed have likely been displaced or destroyed. There is, however, the possibility that ground-disturbing activities could impact previously undiscovered subsurface prehistoric or archaeological resources. Disturbance of undocumented resources would be a potentially significant impact without the implementation of mitigation measures CUL-1 through CUL-3.

Mitigation Measures

CUL-1: A Qualified Archeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall be retained for the project and will remain on call during all ground-disturbing activities. The Qualified Archaeologist shall ensure that a Worker Environmental Awareness Protection (WEAP) training, presented by a Qualified Archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures to be followed in the event of an unanticipated cultural resource find during construction. The WEAP training can be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

CUL-2: If an inadvertent discovery of archaeological materials is made during project-related construction activities, ground disturbances in the area of the find shall be halted within 50 feet of the find and the Qualified Archaeologist shall be notified of the discovery, who shall notify LABOE. If prehistoric or potential tribal cultural resources are identified, the consulting Native American Tribes shall be notified. The resource shall be fully documented by the Qualified Archaeologist or designee and a Department of Parks and Recreation (DPR) 523 record shall be prepared.

The Qualified Archaeologist, in consultation with consulting Native American Tribes and LABOE, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is an historical resource, a unique archaeological resource, or tribal cultural resources). If avoidance is not feasible, the Qualified Archaeologist, in consultation with the City, shall prepare and implement a detailed treatment plan. Treatment of unique

archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources will consist of, but will not be limited to, in-field documentation, archival research, subsurface testing, excavation, and preparation of a final report and DPR 523 record. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of the final report and DPR 523 record(s) to LABOE and the South Central Coastal Information Center.

CUL-3: Should excavation activities extend past 3 feet bgs, an archaeological monitor shall be present for all ground-disturbing activities in native soil within the construction area. All archaeological monitors, working under supervision of the Qualified Archaeologist, shall have construction monitoring experience and be familiar with the types of historical and prehistoric resources that can be encountered. Ground-disturbing activities include, but are not limited to, excavation, trenching, grading, and drilling. A sufficient number of archaeological monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. The Qualified Archaeologist shall have the ability to recommend, with written and photographic justification, the reduction or termination of monitoring efforts to LABOE, and should LABOE and the consulting Native American Tribes concur with this assessment, then monitoring shall be reduced or ceased.

If an inadvertent discovery of archaeological materials is made during project-related construction activities, the archaeological monitor shall have the authority to halt ground-disturbing activities within 50 feet of the resource(s) and an ESA physical demarcation shall be constructed. The procedures for inadvertent discoveries described in CUL-1 shall be followed.

Impacts on archaeological resources would be less than significant after mitigation.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Reference: L.A. CEQA Thresholds Guide (Section D.1); City of Los Angeles General Plan Conservation Element; Geologic map of various quadrangles; Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.

Comment: A significant impact could occur if grading or excavation activities associated with the project disturbs unique paleontological resources or unique geologic features that presently exist within the project site.

Less than significant impact with mitigation incorporated. The City is primarily mapped as being underlain by geologic units that have high or undetermined paleontological potential (either at the surface or at depth), including Holocene-age

younger surficial sediments; Pleistocene-age older surficial sediments, including the Palos Verde Sand; Pleistocene-age shallow marine deposits, including the San Pedro Sand, Timms Point Silt, Lomita Marl, and Inglewood Formation; Pleistocene-age Pacoima Formation; Pleistocene- to Pliocene-age Saugus Formation; Pliocene-age Pico Formation; Pliocene-age Fernando Formation; Pliocene- to Miocene-age Towsley Formation; Miocene-age marine strata attributed to the Sisquoc Shale and Modelo Formation; Miocene-age Malaga Mudstone; Miocene-age Monterey Formation; shale attributed to the Miocene-age Puente Formation; Miocene-age detrital sediments of Lindero Canyon; Miocene-age Topanga Formation; Miocene- to Eocene-age Sespe Formation; Paleocene-age Santa Susana Formation; and Cretaceous Chatsworth Formation and unnamed strata attributed in part to the Chico, Trabuco, and Tuna Canyon formations.

New and upgraded transit shelters and sidewalk amenities would be located within a primarily urbanized area that has been subject to extensive disturbances from development activities and the construction and improvement of the existing roads and sidewalks. As a result of previous development activities, surficial paleontological resources that may have existed have likely been displaced, buried by artificial fill, or destroyed. There is, however, the possibility that ground-disturbing activities during project implementation could impact subsurface paleontological resources if native (i.e., previously undisturbed) sediments belonging to geologic units with high or undetermined paleontological potential are encountered during construction. Disturbance of subsurface paleontological resources would be a potentially significant impact without implementation of mitigation measure PAL-1.

Mitigation Measures

PAL-1: A Qualified Professional Paleontologist meeting the standards outlined in the Society of Vertebrate Paleontology (SVP) guidelines (2010) shall be retained for the project and will remain on call during all ground-disturbing activities. The Qualified Professional Paleontologist shall ensure that a WEAP training is provided to all construction and managerial personnel involved with the project. The WEAP training shall provide an overview of paleontological resources and outline regulatory requirements for the protection of paleontological resources. The WEAP will also cover the proper procedures in the event of an unanticipated paleontological resource discoveries. The WEAP training can be in the form of a video or PowerPoint presentation. Printed literature (handouts) can accompany the training and can also be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

PAL-2: If an inadvertent discovery of paleontological materials is made during project-related construction activities, ground disturbances in the area of the find shall be halted, and the Qualified Professional Paleontologist shall be notified regarding the discovery.

The Paleontologist, in consultation with StreetsLA, shall determine whether the resource is potentially significant. If determined to be significant, the paleontological resources will be recovered, prepared to the point of curation, identified, analyzed, and curated at the Natural History Museum of Los Angeles County or another accredited repository along with associated field data. At the completion of ground-disturbing activities, a report documenting the methods and results of paleontological fieldwork will be prepared by the Qualified Professional Paleontologist and submitted to StreetsLA and the fossil repository.

Impacts on paleontological resources would be less than significant after mitigation.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Reference: L.A. CEQA Thresholds Guide (Section D.2); HCM List; NRHP; CRHR; Cultural Resources Study (Paleo Solutions, 2021).

Comment: A significant impact would occur if grading or excavation activities associated with the proposed project disturbed interred human remains.

Less than significant impact with mitigation incorporated. A total of five cemeteries or burial locations have been previously recorded and determined eligible for either local, California, and/or National resource registers. No improvements are proposed by the STAP within the boundaries of a cemetery. The proposed depths of excavation are 3 feet bgs for utility relocation and the construction of new shelters; shelter dismantling and removal would be limited to existing roadways and sidewalks. As a result, it is anticipated that native soil (i.e., undisturbed, non-fill sediments) would not be reached, and no human remains would be impacted. There is, however, the possibility that ground-disturbing activities that extend below a depth of 3 feet bgs could encounter human remains. Disturbance of human remains would be a potentially significant impact without implementation of mitigation measure CUL-4.

Mitigation Measure

CUL-4: In the event of the inadvertent discovery of human remains, the contractor shall immediately notify the County Coroner and LABOE. If the County Coroner determines the remains are Native American in origin, the Coroner shall contact the NAHC in accordance with Health and Safety Code Section 7050.5 subdivision c, and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate the MLD for the remains per PRC 5097.98. Under PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the MLD regarding their recommendations, if applicable. If the remains are determined to be neither of forensic value to the

Coroner, nor of Native American origin, provisions of the California Health and Safety Code Section 7100 37 *et seq.* directing identification of the next-of-kin will apply.

Impacts would be less than significant after mitigation.

3.6 Energy

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

3.6.1 Regulatory Setting

This section describes existing laws and regulations related to energy that are applicable to the project.

3.6.1.1 Federal

Energy Independence and Security Act

The Energy Independence and Security Act (EISA) of 2007 increases the supply of alternative fuel sources, strengthening standards for energy conservation, and requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs. Additional provisions of EISA address energy savings in government and public institutions, and promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs." A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

3.6.1.2 State

Senate Bills 1078

SB 1078 (Public Utilities Code [PUC] Chapter 2.3, Sections 387, 390.1, and 399.25) implemented a California Renewable Portfolio Standard (RPS), which established a goal that 20 percent of the energy sold to customers be generated by renewable resources by 2017. The goal was accelerated in 2006 under SB 107 and expanded in 2011 under SB 2, which required electric service providers and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020.

Senate Bill 1389

SB 1389 (PRC Chapter 568, Statutes of 2002) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report, assessing major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors. The report is also intended to provide policy recommendations to conserve resources, protect the environment, and ensure reliable, secure, and diverse energy supplies. The 2019 Integrated Energy Policy Report, which was required under SB 1389, was adopted on February 20, 2020.

Assembly Bill 2076, Reducing Dependence on Petroleum

The CEC and CARB are directed by AB 2076 (passed in 2000) to develop and adopt recommendations for reducing dependence on petroleum. A performance-based goal is to reduce petroleum demand to 15 percent less than 2003 demand by 2020.

3.6.1.3 Local

GreenLA – An Action Plan to Lead the Nation in Fighting Global Warming

On May 15, 2007, Los Angeles Mayor Antonio Villaraigosa released the GreenLA Plan that has an overall goal of reducing the City of Los Angeles' GHG emissions by 35 percent below 1990 levels by 2030. This goal exceeds the targets set by both California and the Kyoto Protocol, and it is the greatest reduction target of any large United States city. The cornerstone of the GreenLA Plan is increasing the City's use of renewable energy to 35 percent by 2020.

City of Los Angeles Sustainability pLAn

On April 8, 2015, Mayor Eric Garcetti released the Los Angeles Sustainability pLAn, a roadmap to achieve back to basics short-term results while setting the path to strengthen and transform the City. The pLAn is made up of short-term (by 2017) and longer-term (by 2025 and 2035) targets in 14 categories to advance the City's environment, economy, and equity. In 2019, Mayor Eric Garcetti released an update to the pLAn (LA's Green New Deal), which accelerates previous sustainability targets and looks even farther out to 2050.

LADWP Power Strategic Long-Term Resource Plan

The 2017 Power Strategic Long-Term Resource Plan (SLTRP) is a 20-year roadmap that guides the Los Angeles Department of Water and Power's (LADWP) power system in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. As LADWP starts the process to investigate, study, and determine the investments needed for a 100 percent clean energy portfolio, the 2017 SLTRP provides a path towards this goal with a combination of GHG reduction strategies, including early coal replacement 2 years ahead of schedule by 2025; accelerating RPS to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036; doubling of energy efficiency from 2017 through 2027; repowering coastal in-basin generating units with new, highly efficient potential clean energy projects by 2029 to provide grid reliability and critical ramping capability; accelerating electric transportation to absorb GHG emissions from

the transportation sector; and investing in the Power System Reliability Program to maintain a robust and reliable power system.

3.6.2 Existing Environment

Electricity

Power and electrical services to existing transit shelters in the City are provided by LADWP, which supplies more than 26 million megawatt hours (MWh) of electricity per year for its 1.54 million residential and business customers. LADWP has more than 8,009 megawatts (MW) of net dependable generation capacity. Of LADWP's total power resources, approximately 34 percent are from renewable sources, 27 percent from natural gas, 14 percent from nuclear, 21 percent from coal, and 3 percent from large hydroelectric. Approximately 70 percent of the electricity in the City is consumed by business and industry, with the remaining 30 percent from residential uses, averaging approximately 500 kilowatt hours of usage per month.

The "urban heat island effect" contributes to the amount of energy consumed in the City. EPA provides the following definition of "heat island" and describes how it impacts energy:

> *"The term 'heat island' describes built up areas that are hotter than nearby rural areas. The annual mean air temperature of a City with 1 million people or more can be 1.8°F to 5.4°F (1°C to 3°C) warmer than its surroundings. In the evening, the difference can be as high as 22°F (12°C). Heat islands can affect communities by increasing summertime peak energy demand, air conditioning costs, air pollution and greenhouse gas emissions, heat-related illness and mortality, and water quality" (EPA, 2018a).*

The urban heat island effect contributes to energy demand due to increases in the use of air conditioning during warmer weather. According to Energy-Saving Potentials and Air Quality Benefits of Urban Heat Island Mitigation, electricity demand for cooling increases 1.5 to 2.0 percent for every 1 degree Fahrenheit (°F) increase in air temperatures, starting from 68°F to 77°F, suggesting that 5 to 10 percent of community-wide demand for electricity is used to compensate for the heat island effect. During extreme heat events, which are exacerbated by urban heat islands, the resulting demand for cooling can overload electric systems and require a utility to institute controlled rolling brownouts or blackouts to avoid power outages.

Transportation Fuels

In California, the transportation sector is the state's largest energy-consumer, due to high demand from California's motorists, major airports, and military bases. Most transportation energy is currently derived from petroleum products because most automobiles and trucks consume gasoline and diesel fuel. The transportation sector consumes relatively minor amounts of natural gas or electricity, but propelled mainly by air quality laws and regulations, technological innovations in transportation are expected to increasingly rely on compressed natural gas and electricity as energy sources.

Energy consumption by on-road motor vehicles reflects the types and numbers of vehicles, the extent of their use (typically described in terms of VMT), and their fuel economy (typically described in terms of miles per gallon [mpg]).

Although California's population and economy are expected to continue to grow, gasoline demand is projected to decline from roughly 15.8 billion gallons in 2017 to between 12.3 and 12.7 billion gallons in 2030, a reduction of 20 to 22 percent. This decline is due to increasing vehicle electrification and higher fuel economy for new gasoline vehicles.

3.6.3 Impact Analysis

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Reference: L.A. CEQA Thresholds Guide (2006) (Section M.4); State CEQA Guidelines (2021) (Appendices F and G); LADWP Power Facts and Figures; CalEEMod; California Energy Consumption Database.

Comment: A significant impact would occur if the project construction or operation required wasteful, inefficient, or unnecessary consumption of energy resources.

Less than significant impact. STAP implementation would involve construction and operational energy consumption of electricity and transportation fuels.

Construction

Table 3-4 above (see Section 3.3.3) provides a summary of the annual construction work that would be completed in the first 3 to 6 years, and Table 3-5 above (see Section 3.3.3) provides the crews, equipment, and vehicle miles for daily construction activities. Small pieces of equipment are expected to be powered by diesel-powered generators and not plugged into the electric grid. As such, construction activities would not require the consumption of electricity.

Transportation fuels would be consumed by construction equipment, worker trips to and from construction sites, and material delivery and disposal trips. Annual diesel fuel and motor gasoline consumption during construction of the STAP elements were estimated using CalEEMod in conjunction with fuel consumption factors from the CARB OFFROAD inventory and fuel-specific carbon content factors from the EPA reference document Emission Factors for Greenhouse Gas Inventories. Table 3-11 summarizes the annual petroleum-based fuels consumption that would occur during each year of the STAP construction. As shown, the total diesel fuel consumption would be approximately 339,464.1 gallons, and total gasoline consumption would be approximately 15,327.5 gallons to construct the proposed STAP program elements.

Table 3-11. STAP Annual Construction Fuel Consumption

Program Year	Off-Road Equipment Fuel Consumption (Gallons of Diesel)	On-Road Truck Fuel Consumption (Gallons of Diesel)	On-Road Light Duty Vehicle Fuel Consumption (Gallons of Gasoline)
1	90,313.9	48,106.6	5,832.0
2	60,664.3	39,857.5	4,747.8
3	60,664.3	39,857.5	4,747.8
3-Year Totals	***211,642.5***	***127,821.6***	***15,327.5***

Source: Calculations made by TAHA, 2021.

In 2019, the CEC estimated that approximately 276 million gallons of diesel fuel were purchased within Los Angeles County, which represents 15.7 percent of statewide diesel fuel sales (1,756 million gallons). Construction of the project would require the purchase and use of approximately 138,420 gallons of diesel fuel during the first year of the implementation schedule, which would represent approximately 0.05 percent of retail diesel sales within Los Angeles County. Based on existing diesel fuel supply, the 0.05 percent increase in countywide sales associated with implementation of the project would not place a strain on existing diesel resources. Similarly, 2019 Los Angeles County retail gasoline sales were approximately 3.56 billion gallons, representing approximately 23 percent of statewide sales. Implementation of the project would result in an annual increase of up to 5,832 gallons of gasoline sales within the county, which would represent an increase of less than 0.0002 percent. Therefore, construction of the project would not place a burden on the supply of diesel fuel or motor gasoline in the region.

Equipment and vehicles utilized in construction activities would also be subject to compliance with all statewide and local regulations pertaining to the efficient use of transportation fuels (such as the CARB Airborne Toxics Control Measure [Title 13, CCR, Section 2485] and Off-Road Diesel Regulation). Therefore, the project would not result in a wasteful, inefficient, and unnecessary usage of energy, nor would it result in a substantial increase in energy demand that would affect local or regional energy supplies or require additional capacity or infrastructure to meet an increased demand. Transportation fuel impacts during construction would be less than significant.

Operations and Maintenance

All transit shelters would come equipped with evening-hour security lighting to illuminate passenger waiting areas beneath the canopies. Shelter roofs may be equipped with solar panels or green roofs in limited quantities depending on need and/or appropriateness. Other optional shelter features may include free Wi-Fi, charging ports or stations, and possibly cooling systems. Shelters may include digital advertising, although motion on digital screens would not be allowed and limitations would be placed on their brightness. Digital elements would have ENERGY STAR ratings for efficiency with LED screens. These devices automatically control their brightness in response to the time of day and sunlight.

It is foreseeable that only 1/3 or less of the 3,000 total transit shelters would contain digital displays, with the remainder containing static displays that are back-lit during evening hours only. Assuming an electricity use rate of 440 to 1,240 watts for 12 hours per day (with power use of 5.3 kWh per day for 2,000 transit shelter locations and 14.9 kWh per day for 1,000 transit shelter locations), the 3,000 transit shelters would consume a total of approximately 9,285.6 MWh annually, while the existing shelters are estimated to be consuming approximately 3,631 MWh per year.[6] Implementation of the STAP would increase annual electricity consumption by approximately 5,655 MWh. According to CEC data, LADWP customers consumed approximately 23.4 million MWh of electricity in 2019. The incremental increase in electricity consumption associated with project operations would represent approximately 0.02 percent of total 2019 consumption. Additionally, the LADWP system has a net dependable capacity of approximately 8,009 MW, and the record instantaneous demand was approximately 6,500 MW measured in August 2017. Conservatively assuming a peak instantaneous demand of 1,500 watts at all 3,000 transit shelter locations, the total consumption rate would only be 4.5 MW. Therefore, implementation of the project would not produce a peak electricity demand that would overburden the existing capacity of LADWP's infrastructure. Operational activities would require minimal consumption of electricity that would not be significant when considering citywide electricity use and power generation.

While the power consumption of proposed transit shelters and associated amenities is only estimated above, it is anticipated that power requirements would be reduced over time as greater efficiencies are realized as new technologies are implemented. The contractor is required to consider and include solar power to provide energy that would offset power needs from traditional electrical systems. It is anticipated that as much as 50 percent of the 3,000 transit shelters under STAP may be powered by solar energy alone, further offsetting any power needs associated with shelters equipped with digital media displays. Continuation and expansion of the operational transit shelter maintenance activities would result in energy consumption through motor gasoline and diesel fuel use. Table 3-7 above (see Section 3.3.3) presents a summary of the total annual maintenance services and the average daily activities that are anticipated with implementation of the STAP and under existing conditions. These activities would result in the consumption of gasoline and/or diesel fuel. The anticipated annual consumption of transportation fuel during operational activities is approximately 26,700 gallons of diesel fuel associated with vehicle trips, approximately 13,400 gallons of diesel fuel for cleaning equipment, and approximately 17,200 gallons of gasoline associated with vehicle trips. The total annual diesel consumption during project operations would be approximately 40,000 gallons, which would represent approximately 0.015 percent of countywide retail sales in 2019. Annual gasoline consumption would represent approximately 0.0005 percent of 2019 countywide retail sales. Therefore, the STAP would not place an undue burden on existing petroleum-based transportation fuel supply. As a result, transportation fuel impacts during the maintenance activities from the project would be less than significant.

[6] The analysis assumes that all of the 1,884 existing transit shelter locations require 440 watts of electricity for 12 hours per day for lighting.

Impacts would be less than significant, and no mitigation is required.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Reference: L.A. CEQA Thresholds Guide (2006) (Section M.4); State CEQA Guidelines (2021) (Appendices F and G); LA's Green New Deal; SLTRP; Final 2019 Integrated Energy Policy Report; GreenLA Plan.

Comment: A significant impact would occur if the project conflicted with or obstructed a State or local plan for renewable energy or energy efficiency.

Less than significant impact. Energy legislation, policies, and standards adopted by California and local governments were enacted and promulgated for the purpose of reducing energy consumption and improving efficiency (i.e., reducing the wasteful and inefficient use of energy). The wasteful, inefficient, and/or unnecessary use of energy is defined as a circumstance in which the project would conflict with applicable State or local energy legislation, policies, and standards or result in increased per capita energy consumption. Accordingly, inconsistency with legislation, policies, or standards designed to avoid wasteful, inefficient, and current citywide average is used to evaluate whether the project would result in a significant impact related to energy resources and conservation. As discussed above, implementation of the project would not produce a peak or annual electricity demand that would overburden the existing capacity of LADWP's infrastructure. In addition, implementation of the project would not place an undue burden on existing petroleum-based transportation fuel supply. Although the project would utilize electricity and transportation fuels, there is no potential for the project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

In addition, STAP would promote the use of transit services as an alternative to private vehicle use; thus, it would reduce total fuel consumption within the City. Equipment and vehicles utilized in construction activities would also be subject to compliance with State and local regulations pertaining to the efficient use of transportation fuels (e.g., the CARB Airborne Toxics Control Measure [Title 13, CCR, Section 2485] and Off-Road Diesel Regulation). The provision of transit shelters to create shade is also consistent with strategies contained in L.A.'s Green New Deal (Sustainability pLAn) to reduce the urban heat island effect.

Impacts would be less than significant, and no mitigation is required.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

3.7.1 Regulatory Setting

This section describes existing laws and regulations related to geology and soils that are applicable to the project.

3.7.1.1 Federal

There are no federal regulations that specifically address impacts related to geology and soils and are applicable to the project.

3.7.1.2 State

Alquist-Priolo Earthquake Fault Zoning Act

The *Alquist-Priolo Earthquake Fault Zoning Act* requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults to mitigate the hazard of surface faulting to structures for human occupancy. Local agencies are required to regulate development projects within the Earthquake Fault Zones (e.g., preventing the construction of buildings used for human occupancy within 50 feet of the surface trace of active faults). In the City, Earthquake Fault Zones have been defined for the Newport-Inglewood, Hollywood, Santa Monica, Raymond, Sierra Madre, and San Fernando faults.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act addresses earthquake hazards from non-surface fault rupture, including hazards related to liquefaction and seismically induced landslides. It required the identification and mapping of seismic hazard zones (i.e., Liquefaction Zones and Earthquake-Induced Landslide Zones of Required Investigation) to help cities and counties in preparing the safety elements of their general plans and encourages land use management policies and regulations that reduce seismic hazards. Liquefaction zones have been identified in portions of the Los Angeles Basin, San Fernando Valley, San Pedro area, and other low-lying areas with shallow groundwater and as such, considered susceptible to liquefaction.

3.7.1.3 Local

City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element addresses seismic and geologic hazards in the City and includes goals, objectives, and policies for minimizing potential injury, loss of life, property damage, and disruption of the social and economic life due to fire, water-related hazard, seismic event, geologic condition, or release of hazardous materials. The Safety Element requires compliance with applicable State and federal planning and development regulations (e.g., Alquist-Priolo Earthquake Fault Zoning Act and Seismic Hazards Mapping Act).

Public Works Construction Regulations

Chapter VI of the LAMC regulates all City public works and property. Section 62.103 requires permits for streets, sidewalks, and other improvements from the Board of Public Works, after the City Engineer's review and approval of plans and specifications. All work is required to comply with the WATCH, Green Book and Brown Book, and the City's Standard Plans.

3.7.2 Existing Environment

The City is located in the northern section of the Peninsular Ranges Geomorphic Province and the southern portion of the Transverse Ranges Geomorphic Province. The Peninsular Ranges consists of northwest-southeast-trending, fault-bounded discrete blocks, with mountain ranges, broad intervening valleys, and low-lying coast plains. Within California, the province extends approximately 125 miles from the Transverse Ranges and the Los Angeles Basin south to the Mexican border, extending farther south for approximately 775 miles to the tip of Baja California. It is bound on the east by the right-slip San Andreas Fault Zone, the Eastern Transverse Ranges, and the Colorado Desert.

In contrast to the other mountain ranges in California, which are aligned north to south, the Transverse Ranges are aligned transverse to the northwesterly trending San Andreas Fault and span east to west for approximately 320 miles, beginning at the boundary of Joshua Tree National Monument with the Mojave Desert and Colorado Desert on the North American Plate, crossing the San Andreas Fault at the Cajon Pass, and terminating at San Miguel Island on the Pacific Plate. The northern portion of the City is situated in the Western Transverse Ranges, which include the San Gabriel Mountains, Santa Monica Mountains, Santa Ynez Range, and Santa Barbara Channel Islands; as well as several major sedimentary basins, including the San Fernando basin.

The City lies on a hilly coastal plain where the Pacific Ocean serves as the southern and western boundaries and is defined by the level alluvial plains of the Los Angeles Basin and San Fernando Valley, and the steep-sided mountains and hills that rise above the valleys. The Los Angeles Basin is a broad, level expanse extending from the Hollywood Hills and Santa Monica Mountains on the north, to the Pacific coast on the southwest, to Topanga Canyon on the west, and to the vicinity of Aliso Creek in Orange County on the southeast. The San Fernando Valley is bounded on the north and east by the San Gabriel Mountains, on the north and west by the Santa Susana Mountains, and on the south by the Santa Monica Mountains. These hillside and mountainous areas of the City are generally susceptible to landslides.

Known active faults within and near the City include the following:

- Anacapa-Dume
- Hollywood
- Newport-Inglewood

- Northridge
- Oak Ridge
- Palos Verdes
- Puente Hills Blind Thrust
- Raymond
- San Andreas
- San Gabriel
- San Joaquin Hills Blind Thrust
- San Jose
- Santa Monica
- Santa Susana
- Sierra Madre
- Simi-Santa Rosa
- Upper Elysian Park Blind Thrust
- Verdugo
- Whittier

Earthquake events from one of the regional active or potentially active faults in the City could result in strong ground shaking, depending on the size and type of earthquake, distance from the earthquake epicenter, and subsurface geologic conditions.

Due to the variations in the topography and geology within the City, soil and geologic conditions also vary considerably. Thus, the potential for geologic hazards (e.g., surface rupture, ground shaking, landslides, liquefaction, erosion, lateral spreading) depends on location and underlying soil conditions. Several areas of the City have also experienced subsidence due to substantial withdrawals of groundwater or oil in the past.

3.7.3 Impact Analysis

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.1); City of Los Angeles General Plan Safety Element; California Department of Conservation (CDOC) Fault Activity Map of California.

Comment: Based on the criteria established in the L.A. CEQA Thresholds Guide, a significant impact may occur if the project were located within a State-designated Alquist-Priolo Zone or another designated fault zone.

Less than significant impact. The existing and new transit shelters may be located in Alquist-Priolo Special Study Zones and Fault Rupture Study Areas; thus, they would be subject to potential surface rupture hazards from a major earthquake event. However, the STAP program elements would be designed to maintain structural integrity (in accordance with standard plans and specifications approved by the City Engineer) and would be small, open structures that would allow transit shelter users to move out of surface rupture areas readily. Impacts related to surface rupture would be less than significant, and no mitigation is required.

ii) Strong seismic ground shaking?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.1); City of Los Angeles General Plan Safety Element; LAMC; CDOC Fault Activity Map of California.

Comment: A significant impact could occur if the project were to result in an increased risk to public safety or destruction of property by exposing people, property, or infrastructure due to seismically induced ground-shaking hazards that are greater than the average risk associated with other locations in southern California. .

Less than significant impact. There are several earthquake faults in and near the City and the region that may cause ground shaking. STAP program elements and transit shelter users would be exposed to these ground-shaking hazards during an earthquake event. The intensity of ground shaking would depend primarily on the earthquake's magnitude, the distance from the source, and the geologic characteristics of the site. As stated above, the STAP program elements would be designed to maintain structural integrity and would be small, open structures that would allow transit users to move away hazards created by intense ground shaking. Impacts related to ground shaking would be less than significant, and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.1); City of Los Angeles General Plan Safety Element; LAMC; CDOC CGS Information Warehouse: Regulatory Maps.

Comment: A significant impact would occur if the proposed project were in an area identified as having a high risk of liquefaction and appropriate design measures required within such designated areas were not incorporated into the project.

Less than significant impact. The potential for liquefaction is dependent on underlying soil conditions, and transit shelters and sidewalk amenities may be located in areas subject to liquefaction. Because the STAP program elements would be designed to maintain structural integrity and would be small, open structures, the potential for

liquefaction would be minor. Impacts would be less than significant, and no mitigation is required.

iv) Landslides?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.1); City of Los Angeles General Plan Safety Element; LAMC; CDOC CGS Information Warehouse: Regulatory Maps.

Comment: A significant impact could occur if the project sites were in an area identified as having a high risk of landslides.

Less than significant impact. Landslides generally occur in hilly and mountainous areas that are found at the southern and northern sections of the City. While the new and upgraded transit shelters would be located in these areas and could be subject to landslide hazards, the shelters would be placed at sidewalk areas that do not feature steep slopes. In addition, the STAP program elements would be designed to maintain structural integrity, as discussed above. Impacts related to landslides would be less than significant, and no mitigation is required.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Reference: L.A. CEQA Thresholds Guide (Section E.2); General Plan Safety Element.

Comment: The project could have significant sedimentation or erosion impacts if it were to (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation resulting in sediment runoff or deposition that would not be contained or controlled on the project site.

Less than significant impact. STAP program elements would be located at sidewalk areas that are paved and would maintain the paved condition of these areas. While erosion may occur temporarily during soil disturbance associated with the removal of concrete and excavation for structural foundations, this erosion would be short term and is not expected to result in the erosion of adjacent areas. No permanent erosion would occur with the project. Impacts related to erosion would be less than significant, and no mitigation is required.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Reference: L.A. CEQA Thresholds Guide (Section E.1); General Plan Safety Element; LAMC.

Comment: The project could have a significant impact if the proposed project is built in an unstable area without proper site preparation, or were to cause or accelerate

geologic hazards causing substantial damage to structures or infrastructure, or if it were to expose people to substantial risk of injury.

Less than significant impact. STAP program elements would be designed to maintain structural integrity, with an adequate margin of safety, to address site-specific geologic and soil conditions. Thus, impacts related to soil instability would be less than significant, and no mitigation is required.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Reference: General Plan Safety Element; LAMC.

Comment: A significant impact may occur if the project were built on expansive soils without proper site preparation or design features, thereby posing a hazard to life and property.

Less than significant impact. STAP program elements would be designed to maintain structural integrity, with an adequate margin of safety, to address site-specific geologic and soil conditions, including soil expansion. Thus, impacts related to soil expansion would be less than significant, and no mitigation is required.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Reference: L.A. CEQA Thresholds Guide (Section E.3).

Comment: A significant impact would occur if the proposed project were built on soils that were incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system and such a system were proposed.

No impact. The STAP does not propose the construction of automated public toilets. All other program elements would not generate wastewater that would require disposal into a septic tank or alternative wastewater disposal system. Thus, the project would not require onsite wastewater treatment and disposal, and it would not be affected by underlying soils that may have constraints for use as leach fields. No impact would occur, and no mitigation is required.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Reference: L.A. CEQA Thresholds Guide (Section D.1); City of Los Angeles General Plan Conservation Element; Geologic map of various quadrangles; Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.

Comment: A significant impact could occur if grading or excavation activities associated with the project disturb unique paleontological resources or unique geologic features that presently exist within the project site.

Less than significant impact with mitigation incorporated. Please refer to Section 3.5 for a discussion of paleontological resources. Section 3.5.3 c) specifically addresses project impacts on paleontological resources.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

An Air Quality and GHG Analysis was prepared for the project and is provided in Attachment B. The findings of the memo related to GHG emissions are summarized below.

3.8.1 Regulatory Setting

This section describes existing laws and regulations related to GHG emissions that are applicable to the project.

3.8.1.1 Federal

Massachusetts v. Environmental Protection Agency

The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency, 127 S.Ct. 1438 (2007)*, that carbon dioxide (CO_2) and other GHGs are pollutants under the federal CAA, which EPA must regulate if it determines they pose an endangerment to public health or welfare. On April 17, 2009, EPA issued a proposed finding that GHGs contribute to air pollution that may endanger public health or welfare. EPA stated that high atmospheric levels of GHGs "are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes." EPA further found that "atmospheric concentrations of GHGs endanger public health and welfare within the meaning of Section 202 of the Clean Air Act." The findings were signed by the EPA Administrator on December 7, 2009.

Final Endangerment Finding

EPA adopted a Final Endangerment Finding for defined GHGs, as required before EPA can regulate GHG emissions under Section 202(a)(1) of the CAA. EPA also adopted a Cause or Contribute Finding in which the EPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not themselves

impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

Energy Independence and Security Act

The EISA of 2007 facilitates the reduction of national GHG emissions by increasing the supply of alternative fuel sources, strengthening standards for energy conservation, and requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs.

3.8.1.2 State

California Greenhouse Gas Reduction Targets

Executive Order S-3-05 created GHG emission reduction targets in California. The targets included reducing GHG emissions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. The California Climate Action Team (CAT) was created to collectively and efficiently reduce GHG emissions. The CAT provides periodic reports to the Governor and Legislature on the status of GHG reductions in the state, as well as strategies for mitigating and adapting to climate change. The first CAT Report to the Governor and the Legislature in 2006 contained recommendations and strategies to help meet the targets in Executive Order S-3-05. The report stated that smart land use is an umbrella term for strategies that integrate transportation and land use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors.

Executive Order B-30-15 directed State agencies to establish a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030. It also ordered State agencies to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets and directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent ($MMTCO_2e$).

Executive Order B-55-18 establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB will work with relevant agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Assembly Bill 32 and Senate Bill 32

In 2006, the California Legislature adopted AB 32, which focuses on reducing GHG emissions in California to 1990 levels by 2020. It represents the first enforceable Statewide program to limit emissions of GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that

would achieve GHG emissions reductions equivalent to 1990 Statewide levels by 2020. To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

In 2016, the California State Legislature adopted SB 32 and its companion bill, AB 197. SB 32 and AB 197 established a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and included provisions to ensure that the benefits of State climate policies reach disadvantaged communities. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

Climate Change Scoping Plan

AB 32 requires CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020. The 2008 Climate Change Scoping Plan proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."

Subsequent to adoption of the 2008 Climate Change Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document. The Court found that the environmental analysis of the alternatives to the Climate Change Scoping Plan was not sufficient under CEQA. CARB updated the projected 2020 business as usual (BAU) emissions inventory based on current economic forecasts and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory.

The First Update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations. CARB revised the 1990 GHG emissions inventory and 2020 GHG emissions limit to be 431 $MMTCO_2e$. CARB also updated the State's 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulations that had recently been adopted for motor vehicles and renewable energy. CARB's projected statewide 2020 emissions estimate is 509.4 $MMTCO_2e$. The First Update found that California was on track to meet the 2020 emissions reduction mandate established by AB 32. According to the latest emissions inventory from CARB, the total, statewide 2018 GHG emissions were 425.3 million metric tons, which was 6 million metric tons below the 2020 target.

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan. The 2017 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and

rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. For individual projects under CEQA, the 2017 Scoping Plan states that local governments can support climate action goals when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the State's long-term goals, and climate change science.

Senate Bill 375—Sustainable Communities Strategy

SB 375 was adopted with a goal of reducing GHG emissions from cars and light trucks. Under SB 375, the GHG reduction target must be incorporated within that region's RTP, which is used for long-term transportation planning, in an SCS. Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS. The 2020–2045 RTP/SCS prepared by SCAG includes commitments to reduce emissions from transportation sources to comply with SB 375.

3.8.1.3 Regional

SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, SCAG adopted the 2020–2045 RTP/SCS, or Connect SoCal, as an update to the previous 2016–2040 RTP/SCS. Connect SoCal incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and reducing GHG emissions, and encouraging growth in walkable, mixed-use communities with convenient access to transit infrastructure and employment. SCAG, in conjunction with CARB, determined that implementation of Connect SoCal would achieve regional GHG reductions relative to 2005 SCAG areawide levels of approximately 8 percent in 2020 and approximately 19 percent by 2045. The regional GHG emissions reductions achieved through the Connect SoCal Growth Vision are consistent with the regional targets set forth by CARB through SB 375.

3.8.1.4 Local

GreenLA Action Plan

On May 15, 2007, Mayor Antonio Villaraigosa released the Green LA Plan that has an overall goal of reducing the City of Los Angeles' GHG emissions by 35 percent below 1990 levels by 2030. This goal exceeds the targets set by both California and the Kyoto Protocol, and it is the greatest reduction target of any large United States city. The cornerstone of the Green LA Plan is increasing the City's use of renewable energy to 35 percent by 2020.

Sustainability pLAn/LA's Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the Sustainability pLAn, a roadmap to achieve back to basics short-term results while setting the path to strengthen and

transform the City. The pLAn is made up of short-term (by 2017) and longer-term (by 2025 and 2035) targets in 14 categories to advance the City's environment, economy and equity. In 2019, Mayor Eric Garcetti released an update to the pLAn, which accelerates previous sustainability targets and looks even farther out to 2050.

L.A.'s Green New Deal is an expanded vision for the Sustainability pLAn for achieving clean air and water and a stable climate in the City (through a zero carbon grid, zero carbon transportation, zero carbon buildings, zero waste, and zero wasted water). It is intended to serve as a guide for creating an equitable and abundant economy in the City, powered by 100 percent renewable energy. It seeks to build the country's largest, cleanest, and most reliable urban electrical grid to power the next generation of green transportation and clean buildings; educate and train Angelenos to participate in the new green economy; and enact sustainable policies that prioritize economic opportunity.

3.8.2 Existing Environment

GHGs are compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include CO_2, methane (CH_4), nitrous oxide (N_2O), and other gases that are not pertinent to the project.

Table 3-12 displays the statewide GHG emissions from 2009 to 2018 by economic sector as defined in the 2008 Scoping Plan. Generally, California's GHG emissions have followed a declining trend over the past decade. In 2018, emissions from routine emitting activities statewide were approximately 29.3 $MMTCO_2e$ (6 percent) lower than 2009 levels, and approximately 6 $MMTCO_2e$ below the 1990 level (431 $MMTCO_2e$), which is the State's 2020 GHG target. The transportation sector remains the largest source of statewide GHG emissions.

Table 3-12. California GHG Emissions Inventory Trend

Sector	CO_2e Emissions (Million Metric Tons)									
	2009	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**
Transportation	168.0	165.1	161.8	161.4	161.2	162.6	166.2	169.8	171.0	169.5
Electric Power	101.3	90.3	89.2	98.2	91.4	88.9	84.8	68.6	62.1	63.1
Industrial	87.2	91.0	89.3	88.9	91.6	92.4	90.1	88.9	88.7	89.2
Commercial/ Residential	44.5	45.9	46.0	43.5	44.2	38.2	38.8	40.6	41.3	41.4
Agriculture	32.9	33.7	34.4	35.5	33.8	34.8	33.4	33.2	32.3	32.6
High GWP	12.3	13.5	14.5	15.5	16.8	17.7	18.6	19.3	20.0	20.5
Recycling and Waste	8.5	8.7	8.7	8.7	8.7	8.8	8.8	8.9	9.0	9.1
Emissions Total	**454.7**	**448.2**	**443.9**	**451.7**	**447.7**	**443.4**	**440.7**	**429.3**	**424.4**	**425.4**

Source: CARB, *2000–2018 GHG Inventory (2020 Edition)*, available at https://ww2.arb.ca.gov/ghg-inventory-data.

The Sustainability pLAn includes a citywide GHG emissions inventory, with GHG emissions in the City estimated at approximately 32 $MMTCO_2e$ in 2017. The primary sources of emissions are related to solid and wastewater services (41 percent), industrial activities (31 percent), and transportation (21 percent). In 2017, the City had reduced its GHG emissions 25 percent below 1990 levels, and the per capita GHG emissions are one-third of the national average.

3.8.3 Impact Analysis

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Reference: State CEQA Guidelines (2021) (Appendix G); Air Quality and GHG Analysis (TAHA, 2021).

Comment: A significant impact may occur if the proposed project would generate GHG emissions that would have a significant impact on the environment.

Less than significant impact. Implementation of the STAP would generate construction and operational GHG emissions.

Construction

Construction activities are anticipated to last for 3 years under the most efficient schedule feasible. Based on GHG emission estimates using CalEEMod, as shown in Table 3-13, construction activities to implement the project would generate approximately 1,358 $MTCO_2e$ in the first year and 1,108 $MTCO_2e$ in the second and third years of the STAP, which sums to a total of 3,574 $MTCO_2e$ over the course of the 3-year construction period. The STAP construction emissions amortized over a 30-year operational lifetime would be approximately 119 $MTCO_2e$ annually. Project construction emissions amortized over a more conservative 10-year contract period for the STAP would be approximately 357 $MTCO_2e$ annually.

Table 3-13. Estimated Construction GHG Emissions

Program Year	Shelter Removal Emissions ($MTCO_2e$)	Shelter Installation Emissions ($MTCO_2e$)	Total Annual GHG Emissions ($MTCO_2e$)
1	137.2	1,221.1	1,358.3
2	158.4	949.5	1,107.9
3	158.4	949.5	1,107.9
		Total Emissions	**3,574.1**
		Amortized Emissions (30-Year Operational Lifetime)	**119.1**
		Amortized Emissions (10-Year Maintenance Contract)	**357.4**

Source: Air Quality and GHG Analysis, TAHA, 2021.

The effect of GHG emissions on the environment is cumulative in nature; therefore, the construction emissions listed in Table 3-13 were analyzed below as part of total GHG emissions for the project lifecycle.

Operations and Maintenance

Sources of GHG emissions during operation would include direct emissions associated with on-road vehicle trips and onsite cleaning equipment, as well as indirect emissions associated with electricity use at the transit shelters. On-road vehicles and off-road equipment use would result in the consumption of gasoline and/or diesel fuel, which would be the primary source of operational GHG emissions. Electricity consumption at the transit shelters assumed an average of 100 to of 800 watts for 16 hours per day at each transit shelter location (1.6 to 12.8 kWh per site per day). Information provided by the City was used to estimate solid waste-related GHG emissions, with existing shelter facilities generating approximately 50 tons of solid waste per year. Using a scaling factor of 1.6 based on the total number of existing transit shelters, annual solid waste generation with implementation of the project was estimated to be 80 tons per year. Table 3-14 summarizes the annual GHG emissions that would occur with STAP implementation, as well as an estimate of existing GHG emissions associated with transit shelter operations.

Table 3-14. Estimated Annual Operations GHG Emissions

Source	Project Annual GHG Emissions ($MTCO_2e$)	Existing Annual GHG Emissions ($MTCO_2e$)	Net Annual GHG Emissions ($MTCO_2e$)
Amortized Construction Emissions (Direct)	357.4	-	357.4
Energy Source Emissions (Indirect)	2,387.2	346.2	2,040.9
Mobile Source Emissions (Direct)	407.2	254.5	152.7
Service Equipment Emissions (Direct)	127.9	85.2	42.6
Waste Disposal Emissions (Indirect)	40.2	25.1	15.1
Total Emissions	**3,319.9**	**1,711.1**	**2,608.8**

Source: Air Quality and GHG Analysis, TAHA, 2021.

As shown in Table 3-14, the STAP would result in an increase of approximately 2,600 $MTCO_2e$ in annual GHG emissions throughout the City's 468.7 square miles during the 10-year program implementation. The annual GHG emissions increase would be less than half of SCAQMD's draft threshold of 3,000 $MTCO_2e$. As LADWP increases its renewables portfolio in future years to comply with the provisions of SB 350 and SB 100, indirect emissions associated with electricity consumption would be reduced over time. The incremental increase in GHG emissions resulting from implementation of the STAP would result in a less than significant impact related to the magnitude of GHG emissions. No mitigation is required.

b) Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Reference: State CEQA Guidelines (2021) (Appendix G); SCAG RTP/SCS; Climate Change Scoping Plan; Air Quality and GHG Analysis (TAHA, 2021).

Comment: A significant impact may occur if the proposed project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. Applicable regulations enacted to reduce GHG emissions include Executive Order S-3-05, the AB 32 Climate Change Scoping Plan, Executive Order B-30-15, SB 32, and the SCAG RTP/SCS.

Less than significant impact. STAP would promote and expand the use of transit, active transportation, and shared mobility by improving the quality and technological capability of associated physical program elements, such as transit shelters, kiosks, and other amenities. Implementation of the project would augment and enhance transit shelter facilities throughout the City, which would provide convenient and accessible amenities to transit riders. The provision of structures that would create shade is consistent with strategies contained in L.A.'s Green New Deal (Sustainability pLAn) to reduce the urban heat island effect. Improving infrastructure accessibility and accommodating multimodal transportation options would create a safer and more sustainable transportation network.

The Air Quality and Greenhouse Gas Emissions Analysis (Attachment B) provides an evaluation of project consistency with GHG reduction actions/strategies. As discussed in the analysis, the project would be consistent with the *Climate Change Scoping Plan* GHG Reduction Strategies and would not conflict with initiatives to reduce emissions. In addition, the project would not conflict with the future anticipated statewide GHG reduction goals. Rather, the project would benefit from statewide and utility-provider efforts towards increasing the proportion of electricity supplied by renewable sources. LADWP has committed to expanding its RPS to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. LADWP's RPS progress and future commitments are consistent with and exceed the SB 350 targets of 33 percent by 2020 and 50 percent by 2030. SB 100, ratified in 2018, accelerated the SB 350 targets to 50 percent RPS by 2026 and 60 percent RPS by 2030, which LADWP will be required to meet. SB 100 also included interim retail end-use RPS targets of 44 percent by the end of 2024 and 52 percent by the end of 2027. The increased contribution of renewable resources to electricity generation would reduce energy-related GHG emissions in future years.

The regional and local plans and policies most relevant to the project include the SCAG Connect SoCal 2020–2045 RTP/SCS, L.A.'s Green New Deal (Sustainability pLAn), and the Mobility Plan 2035. SCAG and the City have prepared these documents in response to statewide initiatives to reduce GHG emissions, including Executive Order S-3-05, AB 32, Executive Order B-30-15, and SB 32. In March 2018, CARB updated the SB 375 targets for the SCAG region to require a per capita passenger vehicle GHG emissions reduction of 8 percent by 2020 and 19 percent by 2035 compared to baseline (2005) GHG emissions. *Connect SoCal* outlines a Core Vision focused on maintaining

and enhancing management of the transportation network, while also expanding mobility choices by creating hubs that connect housing, jobs, and transit accessibility. Enhancing infrastructure accessibility and accommodating multimodal transportation options are critical components to creating a safer and more sustainable transportation network. Although the project would generate GHG emissions, its implementation would also provide enhanced accessibility and convenience to transit users. A consistent theme throughout regional and local plans designed to reduce GHG emissions is the encouragement for the public to engage in active transportation, including walking and biking. Improving transit shelters ad sidewalk amenities would be conducive to choosing and using public transit options. Thus, implementation of the project would not conflict with State, regional, or local plans to reduce GHG emissions. Impacts would be less than significant, and no mitigation is required.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project 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?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

3.9.1 Regulatory Setting

This section describes existing laws and regulations related to hazards and hazardous materials that are applicable to the project.

3.9.1.1 Federal

Toxic Substances Control Act/Resource Conservation and Recovery Act

The federal *Toxic Substances Control Act* and the *Resource Conservation and Recovery Act (*RCRA) established a program to regulate the generation, transport, treatment, storage, and disposal of hazardous wastes. These Acts authorized EPA to secure information on all new and existing chemical substances, as well as to control any of the substances that are determined to cause unreasonable risk to public health or the environment. The RCRA was amended by the Hazardous and Solid Waste Act, which extended the "cradle to grave" system of regulating hazardous wastes.

Comprehensive Environmental Response, Compensation, and Liability Act

The *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA), commonly known as "Superfund," provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. It also revised the National Contingency Plan (NCP), which provides the guidelines and procedures to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP established the National Priorities List (NPL). CERCLA was amended by the *Superfund Amendments and Reauthorization Act* on October 17, 1986.

Emergency Planning and Community-Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) was created to help communities plan for chemical emergencies and to respond to concerns regarding environmental and safety hazards resulting from the storage and handling of toxic chemicals. EPCRA requires the reporting of storage, use, and releases of hazardous substances to federal, state, and local governments.

Section 402 of the Clean Water Act: National Pollutant Discharge Elimination System Permits

CWA Section 402 establishes the NPDES, a permitting system for discharges (except for dredge or fill material) of any pollutant into WoUS. It requires permits for discharges of stormwater from industrial/construction and MS4s.

Occupational Safety and Health Administration Standards

The Occupational Safety and Health Administration's (OSHA) mission is to ensure the safety and health of American workers. OSHA establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs, which are listed in 29 CFR 1910.

Department of Transportation Hazardous Materials Regulations

United States Department of Transportation Hazardous Materials regulations (49 CFR 100–185) cover all aspects of hazardous materials packaging, handling, and transportation. It includes a Hazard Materials Program, Oil Spill Prevention and Response, Emergency Response, Packaging Requirements, Rail Transportation, Vessel Transportation, Highway Transportation, Packaging Specifications, and Packaging Maintenance.

3.9.1.2 State

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) was created as an umbrella agency to the CARB, SWRCB, RWQCBs, CalRecycle, Department of Toxic Substances Control (DTSC), Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation for the protection of human health and the environment and a coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substances Control Regulations

DTSC, a department within CalEPA, is the primary state government agency in California whose focus is to regulate hazardous wastes, clean up existing contamination, and find ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous wastes primarily under the authority of the federal RCRA and the California Health and Safety Code (HSC Division 20, Chapters 6.5 through 10.6, and CCR Title 22, Division 4.5). Other laws that address hazardous wastes are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. HSC Title 22, Article 3 highlights the procedures of identifying hazardous waste into these four categories: ignitable, corrosive, reactive, and toxic. HSC Title 22, Article 5 categorizes hazardous waste into acutely hazardous waste, extremely hazardous waste, non-RCRA hazardous waste, RCRA hazardous waste, special waste, and universal waste. Title 22 of the CCR also underscores the guidelines for managing hazardous waste, which includes storing, housekeeping, record keeping, and inspecting waste.

The DTSC Environmental Health Standards for the Management of Hazardous Waste is included in CCR, Title 22, Division 4.5. All hazardous waste generators must comply with the guidelines for identifying, labeling, accumulating, preparing, and preventing outcomes related to hazardous waste, as enforced by DTSC.

Cortese List

California Government Code Section 65962.5 requires CalEPA to develop a hazardous waste and substances site list (Cortese List), which includes hazardous waste sites according to DTSC and the Health and Safety Code; contaminated public drinking water wells sites listed by the State Department of Health Services; Underground Storage Tank (UST) leaks; solid waste facilities; and hazardous waste sites identified by the SWRCB (sites with certain types of orders; public drinking water wells containing detectable levels of organic contaminants, USTs with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated); and other sites as designated by various other State agencies and local governments. Section 6592.5 requires that the Cortese List be updated at least annually. The Cortese List complies with CEQA requirements in providing information about the location of hazardous materials release sites.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act restricts disposal of wastes or any other activity that may degrade WoS. The Act requires cleanup of wastes that are below hazardous concentrations but could impact ground and surface water quality. The Act established nine RWQCBs, which are primarily responsible for protecting water quality in California. The RWQCBs regulate discharges by issuing permits through NPDES for waste discharge requirements (WDRs) from non-point sources.

Hazardous Waste Control Act

DTSC is responsible for enforcing the *Hazardous Waste Control Act* (California Health and Safety Code Section 25100 *et seq.),* which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a State hazardous waste program that administers and implements the provisions of the federal RCRA cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous wastes and the development of standards that are equal to or, in some cases, more stringent than federal requirements.

California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards in CCR, Title 8—Industrial Relations minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (DOSH or Cal OSHA) and the federal OSHA are the agencies responsible for assuring worker safety in the workplace.

California Labor Code

The *California Labor Code* Division 5, Parts 1, 6, 7, and 7.5 is a collection of regulations that ensure appropriate training on the use and handling of hazardous materials and the operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5 ensures that employees who are in charge of handling hazardous materials are appropriately trained and informed with respect to the materials they handle. Division 5, Part 7, ensures that employees who

work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

California Fire Code

The California Fire Code is a component of the California Building Code and includes fire safety requirements related to fire safety and prevention. Chapter 50 of the California Fire Code includes general provisions and specific regulations for the use, storage, and handling of hazardous materials, unauthorized discharges, and responsibilities for cleanup. The City Fire Code includes mandates from the California Fire Code.

3.9.1.3 Local

City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element sets a goal of minimizing potential injury, loss of life, property damage and disruption of the social and economic life due to fire, water-related hazard, seismic event, geologic conditions, or release of hazardous materials disasters. It includes a policy for health and environmental protection that seeks to protect the public and workers from the release of hazardous materials and protect the City's water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event.

City of Los Angeles Fire Code

LAMC Chapter V, Article 7 is the City's Fire Code, with Part V addressing hazardous materials and containing regulations for the storage, processing, and use of hazardous materials in the City and requiring a permit to operate for specific hazardous materials. It also requires any person to notify the Los Angeles Fire Department (LAFD) upon discovering or being apprised of an uncontrolled hazardous gas leak or hazardous material or substance spill.

City of Los Angeles Emergency Operations Organization and Hazard Mitigation Plan

The City's Department of Emergency Operations Organization (EOO) is responsible for the City's emergency preparation, response, and recovery operations. The EOO is comprised of all agencies and centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources. The 2018 Hazard Mitigation Plan (HMP) was developed to serve as a guide for decision makers in minimizing the effects of natural hazards. It includes a hazard vulnerability analysis, community disaster mitigation priorities, and mitigation strategies and projects.

City of Los Angeles Fire Department Haz Mat Program

The LAFD Haz Mat Program utilizes a unified approach with allied agencies (i.e., Los Angeles County Fire Department) and stakeholders to provide preparedness, prevention, response, mitigation, and resiliency to hazardous materials emergencies in

the City. The Haz Mat Program is designed to address the natural, technological, or purposeful response challenges, including chemical, biological, radiological, nuclear and explosive threats to the City and to national security. As the Certified Unified Program Agency (CUPA), the LAFD implements the Haz Mat Program and uses the *Hazardous Materials Incident Contingency Plan* protocol by the California Office of Emergency Services for the notification process and handling of emergencies related to hazardous material incidents.

3.9.2 Existing Environment

Land use within the City is primarily residential, constituting 60 percent of the City's total land area. Public land is the second most common land use, representing 20 percent, while commercial and industrial land uses each represent 7 percent of the total land area. Hazardous materials are not typically handled in significant amounts in residential areas and open spaces, with hazardous materials limited to those used for cleaning and maintenance activities. Industrial and commercial land uses have a higher likelihood of using hazardous materials and generating hazardous wastes. Industrial facilities utilize hazardous materials; generate hazardous wastes; and may store hazardous materials onsite. Commercial uses, such as vehicle repair shops, gasoline fueling stations, and dry-cleaning facilities, often store hazardous materials in USTs and/or aboveground storage tanks (AST), and in designated storage locations within the facility. These hazardous material users are found throughout the City.

3.9.3 Impact Analysis

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

Reference: L.A. CEQA Thresholds Guide (2006) (Sections F.1 and F.2); State and federal hazardous materials regulations; LAFD's Haz Mat Program.

Comment: A significant impact may occur if the project utilizes substantial amounts of hazardous materials as part of its routine operations and could potentially pose a hazard to the public under accident or upset conditions.

Less than significant impact. There are no hazardous materials at the sidewalk areas where new and upgraded transit shelters may be located. Heavy equipment used during construction of the transit shelters would be fueled and maintained offsite and have substances such as oil, diesel fuel, gasoline, hydraulic fluid, and other liquid substances that would be considered hazardous materials. Improper use, storage, or transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for the improper handling, transportation, or spills associated with the project than would occur for any other similar site on which construction would occur. However, with compliance with existing regulations, such impacts would be less than significant.

STAP program elements would be made from natural, renewable, recyclable, and nontoxic materials to the greatest extent practicable. Other program materials developed for STAP, especially static advertising, may involve small amounts of commonly used hazardous substances, such as architectural coatings and adhesive materials, but they would be able to be converted to biodegradable and/or common recyclable materials. Digital display panels, either free-standing or incorporated as part of a transit shelter, would be comprised of a series of modules that house LED lamps, wiring, and electronics encased in aluminum or steel enclosures. Transit shelter operation and maintenance activities would involve routine power washing and touch up painting, likely on a quarterly and semi-annual basis, as described in Section 2.6.3., *Shelter Operations and Maintenance*. Such maintenance may occasionally require the removal and replacement of defective LED enclosures, thereby generating waste from disposal of the LED unit. LED bulbs, however, are not considered toxic or hazardous and are typically disposed of in standard landfills. These materials would be transported and handled in accordance with all federal, State, and local laws regulating the management and use of hazardous materials. Moreover, compliance with LAFD's Haz Mat Program would further ensure that any potential impacts would be less than significant.

No hazardous materials would be emitted during operation and use of the transit shelters, and no other components of the project's proposed construction or operational characteristics are known to have the potential to create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials. Consequently, impacts would be less than significant, and no mitigation would be required.

b) Would the 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?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and F.2); State and federal hazardous materials regulations; LAFD's Haz Mat Program; City Fire Code.

Comment: A significant impact would occur if the proposed project utilized substantial amounts of hazardous materials as part of its routine operations and could potentially pose a hazard to the public under accident or upset conditions.

Less than significant impact. Construction and operation activities for the STAP would involve relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, solvents, paints, and architectural coatings. During construction and operation, including routine maintenance, these materials would be transported and handled in accordance with applicable federal, State, and local laws and regulations concerning the proper use, storage, transport, and disposal of hazardous materials. With only limited quantities of hazardous materials that would be used for construction and operation, as well as compliance with regulations related to the management and use of hazardous materials, any spills that may occur would be small and localized. The spills would be contained and cleaned according to

the Materials Safety Data Sheet (MSDS)/Globally Harmonized System (GHS) in the appropriate manner, and guidelines of LAFD, as the designated CUPA for the City that regulates hazardous materials identified by EPA and CalEPA.

No land acquisition is proposed as part of the project; therefore, land uses adjacent to transit shelter construction sites that utilize hazardous materials or generate hazardous wastes would not be directly affected by the project. If any stained, discolored, or odorous soils are encountered during ground excavation, the contractor would need to comply with LAMC as it relates to proper use of hazardous materials and notification of the LAFD of any contamination encountered during construction, and the proper disposal of any identified contaminated soils and hazardous wastes. Thus, implementation of the STAP is not anticipated to release substantial amounts of hazardous materials into the environment that would pose a threat to human health or the environment. Impacts would be less than significant, and no mitigation is required.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Reference: L.A. CEQA Thresholds Guide (Section F.2); About the Los Angeles Unified School District.

Comment: A significant impact may occur if the proposed project would be located within 0.25 mile of an existing or proposed school site and is expected to release toxic emissions that pose a hazard to the public.

Less than significant impact. The City is primarily served by Los Angeles Unified School District (LAUSD), which enrolls more than 640,000 students in kindergarten through 12th grade in more than 1,000 schools and more than 200 independently operated public charter schools. In addition, there are various private schools, daycare centers, after school centers, and other educational centers in the City. There are existing or proposed schools within 0.25 mile of existing and planned transit shelters. As discussed above, relatively small quantities of commonly used hazardous materials, such as gasoline, diesel fuel, lubricating oil, grease, solvents, and architectural coatings, would be utilized during construction and maintenance activities. These substances would be used in compliance with applicable federal, State, regional, and local regulations. Also as discussed, the dismantling and removal of existing transit shelters and the excavation of underground utility pipes may expose people to ACM. Compliance with SCAQMD rules and other existing regulations on the removal, handling, and disposal of these hazardous materials would avoid the creation of significant adverse impacts.

The proposed transit shelters and static or digital panels would not utilize hazardous materials or produce hazardous waste in large quantities. Therefore, the project would not generate hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of existing or proposed schools. Any resulting impacts on schools would be less than significant, and no mitigation is required.

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

Reference: L.A. CEQA Thresholds Guide (Section F.2); Cortese List.

Comment: A significant impact may occur if the proposed project sites are included on any of the above lists of hazardous materials and would pose a substantial hazard to the public or surrounding environment.

No impact. The proposed STAP elements would be constructed or installed exclusively within the sidewalk areas of paved public streets that consist of hardscape and roadway improvements that are not known to contain hazardous materials. The transit shelters would not be located on any sites included on any list of hazardous materials compiled pursuant to California Government Code 65962.5 because no known sidewalk or public ROWs are currently on the Cortese list. Therefore, no impacts would occur, and no mitigation measures are necessary.

e) For a project 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?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and F.2) City of Los Angeles General Plan and Community Plans; Airport Land Use Commission (ALUC).

Comment: A significant impact may occur if the proposed project site were located within a public airport land use plan area, or within 2 miles of a public airport, and would create a safety hazard or excessive noise.

Less than significant impact. Five public airports are located within and near the City:

- Los Angeles International Airport (LAX), located at 1 World Way, Los Angeles, is owned by the City of Los Angeles and operated by the City's Department of Airports. Land use is governed by the LAX Plan (2017), one of whose goals is to establish secure and efficient airport ground connection systems to the regional ground transportation network and direct connections to transit.
- Bob Hope Airport (aka Burbank Airport), located at 2627 N. Hollywood Way, Burbank, is owned by the Burbank-Glendale-Pasadena Airport Authority and operates under the Los Angeles County Airport Land Use Plan (ALUP). The airport property borders City of Los Angeles planning areas on two sides, the Sun Valley-La Tuna Canyon Community Plan (1999) and North Hollywood-Valley Village Community Plan (1996), which are immediately northwest and southwest of the airport property, respectively.
- Santa Monica Municipal Airport, located at 3223 Donald Douglas Loop – South, Santa Monica, is owned by the City of Santa Monica; it operates under the ALUP.

The property is located within 2 miles of three City of Los Angeles' planning areas: on the west – West Los Angeles Community Plan; on the northeast – Palms-Mar Vista-Del Rey Community Plan; and on the southeast – Venice Community Plan.

- Van Nuys Airport, at 16461 Sherman Way, Van Nuys, is owned by the City of Los Angeles and operated by the City's Department of Airports. The Van Nuys Airport Plan (2006), an element of Los Angeles City General Plan, encourages the development of transit or other public transportation modes near the airport. The Van Nuys Airport is located within the planning area for the Reseda-West Van Nuys Community Plan; immediately south of the Mission Hills-Panorama City-North Hills Community Plan; and immediately east of the Van Nuys-North Sherman Oaks Community Plan.
- Whiteman Airport, at 12653 Osborne Street in Pacoima, is owned by the City of Los Angeles, and operated by the City's Department of Airports, and is located within the City's Arleta-Pacoima Community Plan.

While several existing and future transit shelters would be located within the boundaries of an ALUP, the proposed shade structures and sidewalk amenities would be relatively low (maximum height of 12 feet) and would comply with the height restrictions and procedures set forth in Federal Aviation Regulations (FAR) Part 77. The STAP program elements would not contribute to or have potential to cause hazards because the shelters and amenities are non-habitable structures. The proposed project would not result in safety hazards because no persons would reside onsite as bus stops, benches, and shelters are intended for short-term, periodic public use. As a consequence, the project would not expose people to safety hazards due to proximity to a public airport. Impacts would be less than significant, and no mitigation is required. Noise impacts from airport and aircraft operations are discussed in Section 3.13.

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

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and K.2); General Plan Safety Element; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact may occur if the proposed project were to substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with emergency response or evacuation.

Less than significant impact. LAFD is responsible for emergency medical services and fire protection within the City. In the event of an emergency, LAFD along with other City agencies would implement all appropriate emergency procedures outlined in the Hazard Mitigation Plan, which was developed to reduce the risks from disasters within the City.

The STAP would replace and provide new transit shelters and sidewalk amenities and would not be located on roadway travel lanes that would serve as emergency response

routes or emergency evacuation routes. While the transit shelters would occupy sidewalk areas that may serve as access to or from abutting land uses and roads, adjacent areas would still be available to provide access. In and of themselves, STAP structures would not impair or interfere with adopted emergency response plans, but they would instead support and facilitate emergency response and evacuation because of their ability to display emergency information. Thus, STAP may actually become a part of the adopted emergency response or evacuation plans. As such, impacts to emergency response and emergency evacuation would be less than significant. No mitigation is required.

g) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Reference: L.A. CEQA Thresholds Guide (Section K.2); General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact may occur if the proposed project were in a wildland area and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.

Less than significant impact. While there are areas in the City that are susceptible to wildfires, STAP program elements would be located on sidewalk areas and not on steep slopes or large open brush areas that are susceptible to wildfires. The transit shelters and sidewalk amenities would also be constructed in accordance with applicable Structural, Seismic, Plumbing, and Electrical Codes and other specific City-adopted policies and standards applicable to the public ROW and would not contribute to wildfire hazards. Wildfires may affect the transit shelters that are located near steep slopes and large open brush areas, but the shelters are open structures that would not expose people to wildfire risks and would allow easy evacuation. Impacts would be less than significant, and no mitigation is required.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) 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 that 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?	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

3.10.1 Regulatory Setting

This section describes existing laws and regulations related to hydrology and water quality that are applicable to the project.

3.10.1.1 Federal

Clean Water Act

The CWA (in 33 U.S.C. 1251–1376) focuses on the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. The Act established the basic structure for regulating discharges of pollutants into WoUS. The CWA delegates authority to EPA to implement pollution control programs. Under the CWA, it is unlawful for any person to discharge any pollutant from a point source into navigable waters. In addition, the CWA requires that states adopt EPA-approved water quality standards for water bodies.

Section 303(d) of the CWA requires each state to identify and list impaired surface waters that do not meet, or that the state expects will not meet, state water quality standards. This is a subset of the 305(b) list, which contains information on all water bodies. Section 401 requires a water quality certification for discharges to meet the effluent limitations and monitoring requirements necessary to ensure compliance with the federal license or permit. Section 402 of the CWA establishes the NPDES permit program to regulate all point source discharges to WoUS, including stormwater associated with construction activities, industrial operations, and municipal drainage systems, to protect surface water quality.

National Flood Insurance Act and Flood Disaster Protection Act

The National Flood Insurance Act and the Flood Disaster Protection Act were enacted to reduce the need for flood protection structures and limit disaster relief costs by restricting development in floodplains. The Federal Emergency Management Agency (FEMA) administers programs associated with these Acts, which include the National Floodplain Insurance Program (NFIP) that enables property owners in participating communities to purchase insurance to protect against flood losses in areas with community floodplain management regulations.

3.10.1.2 State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act is the California equivalent of the federal CWA. Under this Act, the SWRCB and 9 RWQCBs regulate the discharge of wastes that could affect WoS. The Act includes the California Toxics Rule, which is the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California; the Inland Surface Water Quality Standards; the California Urban Water Management Act; and NPDES permits.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) (as promulgated by AB 1739, SB 1168, and SB 1319) provides local agencies with the framework necessary to sustainably manage medium- and high-priority groundwater basins and sets minimum standards for sustainable groundwater management by improving coordination between land use and groundwater planning.

3.10.1.3 Regional

Water Quality Control Plan (Basin Plan)

The Los Angeles RWQCB's Basin Plan was developed to preserve and enhance water quality and protect the beneficial uses of surface and ground water within the coastal watersheds of Los Angeles and Ventura counties. The Basin Plan designates beneficial uses for surface and ground waters; sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's antidegradation policy; and describes implementation programs to protect all waters.

Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles

Discharges of treated or untreated groundwater generated from permanent or temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits are currently regulated under the General WDRs for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2013-095, NPDES No. CAG994004).

Los Angeles County Municipal Stormwater NPDES Permit (MS4 Permit)

The MS4 permit for the Los Angeles County Flood Control District, Los Angeles County, and 84 incorporated cities (including the City of Los Angeles) (Order No. R4-2012-175) contains the requirements necessary to reduce the discharge of pollutants in stormwater runoff to the maximum extent practicable and achieve water quality standards. The MS4 permit also includes requirements for implementation of construction site BMPs for erosion and sediment control, non-stormwater management, and waste management on construction sites less than 1 acre.

3.10.1.4 Local

City of Los Angeles Development Construction Model Program

The City Development Construction Model Program outlines NPDES Phase II requirements for construction sites within the City. BMPs for construction are consistent with those developed by the State and County and include erosion and sedimentation control measures, site management practices, materials and waste management, and general preventive maintenance and inspection.

City of Los Angeles Low-Impact Development Ordinance and Manual

The City's Stormwater Low-Impact Development (LID) Ordinance (Ordinance No. 181899) requires the use of LID standards and practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff; reduce stormwater/urban runoff while improving water quality; promote rainwater harvesting; reduce offsite runoff and provide increased groundwater recharge; and reduce erosion and hydrologic impacts downstream. However, Ordinance No. 181899 exempts "infrastructure projects within the public ROW."

City of Los Angeles Floodplain Management Plan

The City's Floodplain Management Plan (FMP) was originally established by Ordinance No. 154,405 and amended in 2012 and updated in 2020. It serves as the City's overall strategy for the protection of human life and property and minimizing flood hazards to businesses and infrastructure. The FMP identifies flood-related hazards in the City and sets goals for reducing flood hazards in the City. It identifies the City's codes, standards, and ordinances that regulate the development of structures within the 100-year floodplain; seeks to retrofit, purchase or relocate structures in flood hazard areas; and establishes City programs for emergency response and evacuation.

3.10.2 Existing Environment

The City encompasses portions of four watersheds: Los Angeles River, Santa Monica Bay, Ballona Creek, and Dominguez Channel. The Los Angeles River watershed covers approximately 831 square miles, with 287 square miles in the City. The 55-mile-long Los Angeles River originates in the San Fernando Valley and flows through the central portion of the City to San Pedro Bay, near Long Beach. Most of the Los Angeles River and its tributaries consist of concrete-lined channels. Within the City, underground storm drains and concrete-lined drainage ditches connect to the river.

The Santa Monica Bay watershed covers approximately 288 square miles, with 46 square miles in the City. This watershed includes approximately 55 miles of coastline and beaches with approximately 200 separate storm drain outfalls at the Pacific Ocean. Open channel canyons are present at the northern section of the City, with open and underground storm drains in more developed areas.

The Ballona Creek watershed is a sub-watershed of the Santa Monica Bay watershed. It covers approximately 128 square miles, with 107 square miles in the City. Ballona Creek is an approximately 10-mile-long, concrete-lined channel that begins near the center of Los Angeles and flows southwesterly to the Pacific Ocean and into a large estuary. An extensive system of underground storm drains feeds to the creek and estuary.

The Dominguez watershed is a sub-watershed of the Santa Monica Bay watershed. It covers approximately 109 square miles, with 27 square miles in the City. The approximately 16-mile-long Dominguez Channel originates in the southern section of the City (in Hawthorne) and drains approximately two-thirds of the watershed to the

East Basin of the Los Angeles Harbor. The remaining area, including the Wilmington Drain and Machado Lake, discharges independently to the Los Angeles Harbor.

Surface water bodies in the City include dams and reservoirs along water channels such as the Los Angeles River and lakes that serve as storm drainage detention and retention basins.

Floodplain

Based on FEMA's Flood Insurance Rate Maps, portions of the City are within the 100-year and 500-year floodplains.

Groundwater

There are eight groundwater basins underlying the City: the San Fernando Basin, Sylmar Basin, Verdugo Basin, Eagle Rock Basin, Hollywood Basin, Santa Monica Basin, Central Basin, and West Coast Basin. Depth to groundwater varies considerably throughout the City, ranging from 5 feet to more than 400 feet, with the deepest areas in the San Fernando Valley area. The Santa Monica Basin Groundwater Sustainability Agency (SMBGSA) was formed under a Memorandum of Understanding (MOU) between the City of Santa Monica, City of Beverly Hills, LADWP, City of Culver City, and County of Los Angeles to develop a sustainable groundwater management plan for the Santa Monica Basin (a medium priority basin under the SGMA).

3.10.3 Impact Analysis

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

Reference: L.A. CEQA Thresholds Guide (2006) (Section G.1).

Comment: A significant impact would occur if the project discharges water that does not meet the quality standards of the RWQCB, which regulates surface water quality and water discharge into stormwater drainage systems. A significant impact also may occur if a project includes potential sources of water pollutants and has the potential to substantially degrade water quality.

Less than significant impact. No potential sources of water quality degradation are anticipated during the construction of new shelters and refurbishment of existing shelters and digital displays, during the operation and use of the shelters, or during regular routine maintenance of the shelters and display stands. During construction/refurbishment of new and existing shelters, the project would implement BMPs to comply with applicable stormwater management requirements for pollution prevention (MS4 permit). Construction BMPs would include erosion control, spill prevention and control, solid and hazardous waste management, and dust control to reduce the discharge of pollutants from shelter construction sites to the stormwater system. Once the new shelters are operational, no new sources of water quality degradation are anticipated. The transit shelters would require routine maintenance and

cleaning, which would be anticipated to be similar to current routine maintenance and cleaning runoff. Power washing would generate minimal amounts of water that would enter the storm drain system and would not contain pollutants that may degrade water quality. Impacts would be less than significant, and no mitigation is required.

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

Reference: L.A. CEQA Thresholds Guide (Sections G.2, G.3 and G.4).

Comment: A project would normally have a significant impact on groundwater supplies if it were to result in a demonstrable and sustained reduction of groundwater recharge capacity or change the potable water levels sufficiently that it would reduce the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduce the yields of adjacent wells or well fields, or adversely change the rate or direction of groundwater flow.

Less than significant impact. Water would be used during construction of the transit shelters and during routine maintenance, such as power washing of the shelters and sidewalk amenities. Hydration stations may also be installed at the transit shelters as optional elements. However, the volumes of water needed to construct and maintain the transit shelters and potentially operate the hydration stations are anticipated to be negligible compared to current water usage in the City of Los Angeles. LADWP obtains its water supplies mainly from imported sources (i.e., Los Angeles Aqueduct [48 percent], Metropolitan Water District of Southern California [41 percent]), with local wells supplying 9 percent, with 2016–2020 average supply at 495,685 acre-feet (AF) per year. Water use by the STAP would be limited and would not represent major withdrawals of groundwater.

The existing and new transit shelters would be located on sidewalk areas that are paved and impervious. These areas do not serve as recharge areas for groundwater basins. In addition, while there are areas with shallow groundwater (within the San Fernando, Eagle Rock, Central and Hollywood Basins) in the City, excavation activities would be 3 feet bgs for utility relocation and the construction of new shelters, and 0.5 foot bgs for shelter dismantling and removal over a limited area at scattered locations throughout the City. Any encountered groundwater during excavation would be handled and disposed in accordance with the RWQCB's Dewatering General Permit and would be temporary and limited in volume due to the scattered locations and sizes of construction sites. Impacts on groundwater supplies would be less than significant, and no mitigation is required.

c) Would the 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?

Reference: L.A. CEQA Thresholds Guide (Section G.4).

Comment: A significant impact may occur if the project results in a substantial alteration of drainage patterns that results in a substantial increase in erosion or siltation during construction or operation of the project.

Less than significant impact. Existing and new transit shelters and sidewalk amenities would be placed in areas that are paved and impervious and would remain paved. Therefore, the project would not substantially alter the existing drainage pattern of the transit shelter sites. The project shelter locations would be located on existing sidewalks, and additional impervious surfaces are not anticipated. Ground disturbance and potential erosion would be short-term during shelter dismantling and shelter foundation installations; therefore, no substantial erosion or siltation is anticipated to occur onsite or offsite. Impacts would be less than significant, and no mitigation measures are required.

ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Reference: L.A. CEQA Thresholds Guide (Section G.4).

Comment: A significant impact would occur if the proposed project resulted in increased runoff volumes during construction or operation of the proposed project that would result in flooding conditions affecting the project site or nearby properties.

No impact. As stated above, existing and new transit shelters and sidewalk amenities would be placed in areas that are already paved and impervious and would remain paved. Therefore, the volume of runoff is not anticipated to increase. With no increases in runoff volumes, no flooding onsite or offsite is anticipated. No impacts would occur, and no mitigation is required.

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?

Reference: L.A. CEQA Thresholds Guide (Section G.4).

Comment: A significant impact would occur if the volume of runoff increased to a level that exceeded the capacity of the storm drain system serving a project site. A significant impact would also occur if the proposed project substantially increased the probability that polluted runoff would reach the storm drain system.

Less than significant impact. As stated above, existing and new transit shelters and sidewalk amenities would be placed in areas that are already paved and impervious and would remain paved. Therefore, the volume of runoff is not anticipated to increase. Thus, no increase in volumes of runoff being discharged to the storm drain system are anticipated. Pollutants may enter the runoff during construction activities, but implementation of BMPs would reduce pollutants entering the storm drain system.

Trash receptacles would be provided at each transit shelter and wastes regularly collected for landfill disposal. Power washing during maintenance may introduce pollutants into the storm drain system, but limited amounts of pollutants are anticipated due to the size and type of shelter improvements and sidewalk amenities. Impacts would be less than significant. No mitigation is required.

iv) Impede or redirect flood flows?

Reference: L.A. CEQA Thresholds Guide (Section G.4).

Comment: A significant impact would occur if the proposed project placed within a 100-year flood hazard area structures that would impede or redirect flood flows.

Less than significant impact. Existing sidewalk structures do not currently impede or redirect flood flows, and new shelters and sidewalk amenities are not expected to impede or redirect flood flows due to the small size and scattered locations. Impacts would be less than significant, and no mitigation is required.

d) In flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation?

Reference: L.A. CEQA Thresholds Guide (Section G.4); City of Los Angeles General Plan Safety Element.

Comment: A significant impact may occur if the project were located in an area where a dam or levee could fail, exposing people or structures to significant risk of loss, injury, or death. A significant impact may occur if the project were located in an area with inundation potential due to seiche, tsunami, or mudflow. A significant impact would occur if the proposed project creates a risk for the release of pollutants due to inundation when located in a flood hazard, tsunami, or seiche zone.

Less than significant impact. The transit shelters would be located throughout the City, including areas that are subject to flooding due to a seiche or dam failure. However, all dams and reservoirs in the City have been retrofitted pursuant to the 1972 State Dam Safety Act. Thus, a dam failure is unlikely. Portions of the City are also within a Tsunami Inundation Zone. However, people using the transit shelters and other potential amenities would not be residing at these facilities and would only be at the transit shelters for short periods of time. Therefore, the risk of loss, injury, or death involving inundation due to dam failure, seiche, or a tsunami would be less than significant. No mitigation is required.

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

Reference: L.A. CEQA Thresholds Guide (Section G.4).

Comment: A significant impact could occur if the project includes potential sources of water pollutants that would have the potential to interfere with a water quality control plan or sustainable groundwater management plan.

Less than significant impact. As previously discussed, the project would not degrade water quality, and water demand for the project would be limited. No conflict with the Los Angeles RWQCB's Basin Plan or sustainable groundwater management plan for the Santa Monica Basin would occur. Impacts to water quality and groundwater supplies would be less than significant. No mitigation is required.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

A Land Use Consistency Analysis was prepared for the project and is provided in Attachment D. The findings of the study are summarized below.

3.11.1 Regulatory Setting

This section describes existing laws and regulations related to land use and planning that are applicable to the project.

3.11.1.1 Federal

There are no federal regulations that specifically address impacts related to land use and planning and are applicable to the project.

3.11.1.2 State

California Coastal Act

The *California Coastal Act* protects the defined Coastal Zone as a distinct and valuable natural resource of vital and enduring interest to all the people. The Coastal Zone encompasses 1.5 million acres of land and is bounded by the Pacific Ocean on the west and an inland easterly boundary that traverses along the entire California coast. The Coastal Act outlines the standards for development within the Coastal Zone and includes specific policies that address shoreline public access and recreation, lower-cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works. The Act is designed to empower local governments to create Local Coastal Programs (LCP) as land use policy for the conservation and the best use of coastal resources within individual jurisdictions.

Section 30601 of the California Coastal Act states that…. where applicable, in addition to the local permit, a coastal development permit shall be obtained from the California

Coastal Commission for development between the sea and the first public road or within 300 feet of the inland extent of any beach or mean high tide line, or located on tideland, submerged land, public trust land, and within 100 feet of a wetland, estuary, stream, or 300 feet of a coastal bluff, and major public works or energy facility.

Within the City, communities that are totally or partially located within the Coastal Zone include Brentwood/Pacific Palisades, Venice, Palms/Mar Vista/Del Rey, Winchester/Playa Del Rey, San Pedro, Wilmington/Harbor City, and the Los Angeles Harbor Complex.

3.11.1.3 Regional

SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2020–2045 RTP/SCS is a comprehensive long-term transportation plan that provides a vision for the future of the SCAG region's multimodal transportation system and specifies how that vision can be achieved. It combines land use and transportation strategies with options to increase mobility and achieve a more sustainable growth pattern. The RTP/SCS identifies major challenges, as well as potential opportunities associated with growth, transportation finances, the future of airports in the region, and impending transportation system deficiencies that could result from growth projections for the region.

3.11.1.4 Local

City of Los Angeles Charter

The City Charter, Sections 580 and 581, grants powers and duties over City public ROWs, including sidewalks, to the DPW and the Board of Public Works or their designees.

City of Los Angeles General Plan

The City General Plan outlines the City's long-range goals and policies for the development of land within the City and addresses community development relative to the distribution of land use. The City's General Plan includes the Framework Element, Plan for a Healthy Los Angeles – Health and Wellness Element, Housing Element, Mobility Plan 2035 (i.e., Mobility Element), Noise Element, Air Quality Element, Conservation Element, Open Space Element, Safety Element, Infrastructure Systems Element, Public Facilities and Services Element, and 35 Community Plans.

City of Los Angeles Community Plans

The City's General Plan includes 35 community plans that collectively comprise the Land Use Element of the General Plan and are listed in Table 3-15.

Table 3-15. City of Los Angeles Community Plans

Community Plans	Adoption Date
Arleta/Pacoima Community Plan	November 6, 1996
Bel Air/Beverly Crest Community Plan	November 6, 1996 (to be updated in 2021)
Boyle Heights Community Plan	November 10, 1998 *(being updated)*
Brentwood/Pacific Palisades Community Plan	June 17, 1998 (to be updated in 2021)
Canoga Park/Winnetka/Woodland Hills/West Hills Community Plan	August 17, 1999 (to be updated in 2021)
Central City Community Plan	January 8, 2003 *(being updated)*
Central City North Community Plan	December 15, 2000 *(being updated)*
Chatsworth-Porter Ranch Community Plan	September 4, 1993 (to be updated in 2021)
Encino/Tarzana Community Plan	December 16, 1998 *(being updated)*
Granada Hills/Knollwood Community Plan	October 2015 (to be updated in 2021)
Harbor Gateway Community Plan	December 6, 1995 *(being updated)*
Hollywood Community Plan	December 13, 1998 *(being updated)*
Mission Hills/Panorama City/North Hills Community Plan	June 9, 1999
North Hollywood/Valley Village Community Plan	May 14, 1996 *(being updated)*
Northeast Los Angeles Community Plan	June 15, 1999
Northridge Community Plan	February 24, 1998 (to be updated in 2021)
Palms/Mar Vista/Del Rey Community Plan	September 16, 1997 *(being updated)*
Reseda/West Van Nuys Community Plan	November 17, 1999 *(being updated)*
San Pedro Community Plan	June 26, 2018
Sherman Oaks/Studio City/Toluca Lake/ Cahuenga Pass Community Plan	May 13, 1998 *(being updated)*
Silver Lake/Echo Park/Elysian Valley Community Plan	August 11, 2004
South Los Angeles Community Plan	August 2017
Southeast Los Angeles Community Plan	August 2017
Sun Valley/La Tuna Canyon Community Plan	August 13, 1999
Sunland/Tujunga/Shadow Hills/Lake View Terrace/East La Tuna Canyon Community Plan	November 18, 1997
Sylmar Community Plan	June 10, 2015
Van Nuys/North Sherman Oaks Community Plan	September 9, 1998 *(being updated)*
Venice Community Plan	September 29, 2000 *(being updated)*
West Adams/Baldwin Hills/Leimert Community Plan	April 19, 2017
West Los Angeles Community Plan	July 27, 1999 *(being updated)*
Westchester/Playa Del Rey Community Plan	April 13, 2004 *(being updated)*
Westlake Community Plan	September 16, 1997

Table 3-15. City of Los Angeles Community Plans

Community Plans	Adoption Date
Westwood Community Plan	July 27, 1999 (to be updated in 2021)
Wilmington/Harbor City Community Plan	July 14, 1999 *(being updated)*
Wilshire Community Plan	September 19, 2001

Source: City of Los Angeles, 2021j.

Los Angeles Municipal Code

LAMC Chapter I, Article 4.4 contains the City's sign regulations, including requirements for offsite signs and digital displays, among others. It includes provisions for prohibited signs, hazards to traffic, freeway exposure, and standards for different sign types. LAMC Chapter VI, Article 7 provides regulations for outdoor advertising structures, accessory signs, post signs and advertising statuary. It prohibits the construction or maintenance of any sign on a sidewalk, street, alley or other public place without a permit and includes regulations for the size, height, location, illumination, and clearances for various sign types. Article 8 regulates advertising and signs on benches along public ways.

City of Los Angeles Specific Plans

The City has adopted several specific plans that provide detailed planning regulations for defined planning areas. Some of these specific plans include regulations for transit shelters and/or prohibitions for digital displays. See Land Use Consistency Analysis in Attachment D for more details.

Los Angeles Municipal Code

LAMC Section 12.20.2 authorizes applications for Coastal Development Permits prior to certification of the LCP. Projects that take place within City-owned/controlled property (i.e., on government property) are processed by the DPW/BOE/EMG for a Coastal Development Permit. Projects that are on private property or privately owned are processed by the Los Angeles City Planning Department for approval. Because the STAP program elements would occur on public ROWs, such as sidewalks, all Coastal Development Permits not within the Los Angeles City Port Master Plan would be processed by the DPW, BOE. The Harbor Department approves Coastal Development Permits within the Port of Los Angeles.

3.11.2 Existing Environment

The City of Los Angeles is highly urbanized and developed with a mix of land uses, including low-, medium-, and high-density residential, commercial, and industrial areas, public and institutional facilities, open space, and vacant infill lots. As noted above, approximately 21 percent (63,888 acres) of all land in the City is developed as streets, storm drainage channels, utility facilities, and reservoirs. The street pattern is primarily characterized by a grid-like linear pattern that crosses through the City. Major infrastructure includes Chatsworth Reservoir, Sepulveda Basin, Los Angeles Reservoir, Hansen Dam, and the areas abutting Hansen Dam to the southwest.

City streets are located adjacent to all land uses and include sidewalks on one or both sides where existing transit shelters and bus stops are located. These streets include major arterial highways, secondary highways, non-arterial streets, hillside streets, other public ROWs (e.g., service roads and pedestrian malls), and scenic highways. Transit shelters are currently present at approximately 1,884 sidewalk locations on public roads in the City and include a combination of benches, shelters with or without advertising panels, trash receptacles, and at limited locations, bus stop safety lighting and real-time bus arrival information. Numerous other bus stops are only defined by bus stop signs at the sidewalk.

Under the current CSFP, the City maintains an inventory of 1,884 transit shelters, 197 public amenity kiosks, 6 vending kiosks, and 15 automated public toilets at scattered bus stop locations and sidewalks (see Table 2-1 in Section 2).

3.11.3 Impact Analysis

a) Would the project physically divide an established community?

Reference: L.A. CEQA Thresholds Guide (2006) (Section H.2); City of Los Angeles General Plan and Community Plans; Land Use Consistency Analysis (Parsons, 2021).

Comment: A significant impact would occur if the project includes features such as a highway, above-ground infrastructure, or an easement that would cause a permanent disruption to an established community or would otherwise create a physical barrier within an established community.

No impact. Under the STAP, 1,884 existing transit shelters would be replaced at scattered sidewalk locations throughout the City. The proposed upgrades to existing transit shelters would be confined to the sidewalk areas and would not result in a change in land use at the shelter sites or at parcels/properties adjacent to the shelter locations. Because no change in land uses would occur at these locations, no land use impacts or land use conflicts are expected.

The proposed new 1,116 new transit shelters would be placed at bus stops currently absent such amenities. The City has identified existing and possible shelter locations for future upgrades, as shown in the interactive map on the STAP website. These are preliminary locations based on the equity data, but they would be further refined based on specific site conditions and applicable City regulations (e.g., Specific Plans and overlay districts). The sidewalk areas for new transit shelters would maintain an absolute minimum 4-foot-wide clear PAR, along with other clearances in accordance with ADA and City standard plans and regulations. No acquisition of adjacent properties; realignment of roads, alleys, driveways, and ramps; or displacement of fire hydrants, streetlights, utility boxes, or other infrastructure unrelated to the transit shelter are anticipated. Any relocation of utilities and infrastructure on the sidewalk would be incidental to transit shelter construction, as necessary to make bus stops more accessible and to improve the transit rider experience. Because new transit shelters would be located only at the sidewalk areas, no change in land use or conflict with

existing developments and land uses at parcels/properties adjacent to the sidewalk areas for the new transit shelters would occur. The proposed transit shelters would be placed within the bus stops zone established by the bus operators, and no conflict with existing facilities on the sidewalk or adjacent land uses are expected to occur.

STAP program elements that would be located at sidewalk areas would not create a barrier within or between communities, nor would it involve the acquisition, displacement, or division of adjacent land uses and communities. No changes in land use or land use conflicts are expected. No impacts would occur, and no mitigation is required.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Reference: L.A. CEQA Thresholds Guide (2006) (Section H.1), City of Los Angeles General Plan and Community Plans; LAMC, LAAC, RTP/SCS, and California Coastal Act; Land Use Consistency Analysis (Parsons, 2021).

Comment: A significant impact would occur if the proposed project were inconsistent with the General Plan, or other applicable plan, or with the site's zoning if designated to avoid or mitigate a significant potential environmental impact.

Less than significant impact with mitigation incorporated. A review of the City's land use plans and policies and other planning documents was made to determine the STAP's consistency with these plans, policies, and regulations (see Attachment D for the Land Use Consistency Analysis Memo), a summary of which is provided below.

California Coastal Act – Because the STAP program elements would occur on public ROWs, such as sidewalks, all Coastal Development Permits not within the Los Angeles City Port Master Plan would be processed by the City's DPW, BOE, and the Harbor Department would approve Coastal Development Permits within the Port of Los Angeles. With compliance with local coastal programs and a dual coastal permit from the California Coastal Commission, if necessary, for STAP program elements to be located between the sea and the first public road or within 300 feet of the inland extent, no conflict with the California Coastal Act would occur with the STAP.

RTP/SCS – The STAP would not conflict with, but instead support, the goals and guiding principles of the RTP/SCS by providing convenient and attractive transit shelters that would support transit use and reduce vehicle trips and associated air pollutants and GHG emissions. Relevant RTP/SCS goals that the STAP would support include:

2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system

4. Increase person and goods movement and travel choices within the transportation system
5. Reduce GHG emissions and improve air quality
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel

Relevant RTP/SCS guiding principles include:

2. Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system
3. Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities
4. Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single-occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices
5. Encourage transportation investments that will result in improved air quality and public health, and reduced GHG emissions

In addition, no conflict with the growth projections in the RTP/SCS would occur from the STAP because no population or housing growth would be generated by the project.

Los Angeles General Plan – As discussed in the Land Use Consistency Analysis Memo, the City General Plan outlines the City's long-range goals and policies for the physical development of the City and addresses community development relative to the distribution of land uses. The Framework Element serves as the City's overall strategy for long-term growth and is the organizing element that correlates to all the other elements of the General Plan. The STAP would not conflict with the Framework Element's goals, objectives, and policies. The Conservation Element discusses the conservation, protection, development, utilization, and reclamation of natural resources in the City. The STAP would not conflict with the Conservation Element's goals, objectives, and policies because transit shelters and other amenities would have limited impacts on scenic views from public roads. In addition, proposed and replaced transit shelters would not be located at the frontages of lots in specific residential zones and along federal and State-designated scenic highways. STAP program elements would be designed to meet applicable City standards and regulations. The Air Quality Element recognizes the health and economic effects of air pollution and sets goals, objectives, and policies to promote clean air and help the region in attaining the NAAQS and CAAQS. The STAP would support the Air Quality Element's goals, objectives, and policies. The Open Space Element serves as a guide for the identification, preservation, conservation, and acquisition of open space in the City. The STAP would not conflict

with the Open Space Element's goals, objectives, and policies. The STAP would have no direct relevance to the Housing Element, Noise Element, Infrastructure Systems Element, and Public Facilities and Services Element.

The Health and Wellness Element specifically calls out the need for transit services to improve access to healthy options and opportunities. STAP supports this goal by specifically utilizing indicators considered in health and wellness elements, such as heat, socioeconomic factors, households without vehicles and transit riderships as criteria for STAP amenities distribution to ensure that the program will support creation of a healthy community. STAP will support the Safety Element through its ability to communicate emergency response information and possibly aid in disaster recovery by providing solar or emergency backup power capable of charging cell phones and other electronic devices, as well as being a source point for Internet connectivity in times of local or regional emergencies and/or natural disasters.

The Mobility Plan 2035 is "the policy foundation for achieving a transportation system that balances the needs of all road users." It sets goals as advisory guidelines, as opposed to enforceable, codified mandates, for promoting safety first, world-class infrastructure, access for all, informed choices, clean environments, and healthy communities. It includes street classifications, circulation system maps, and objectives and policies for meeting its goals. It also calls for the protection of scenic resources, views, natural topography, and other impacts on adjacent land uses.

Appendix B of the Mobility Plan 2035 includes an Inventory of Designated Scenic Highways and Guidelines for roadway design, earthwork and grading, planting and tree preservation, signs/outdoor advertising, and utilities. However, the Mobility Element Guidelines are not legally enforceable, codified mandates. Rather, the City DPW, through the City Charter and Administrative Code, has administrative authority over what may or may not be built within public ROWs, and LAMC Section 67.02 (b) provides an exemption for outdoor advertising structures at transit shelters (and associated signage) that are placed within public ROWs. Thus, while Guideline 4b prohibits outdoor advertisement, it does not recognize the exemption granted by the Los Angeles City Council for transit shelters as ordered in LAMC Section 67.02 (b), which is codified and enforceable, unlike the Mobility Element Guidelines. The STAP could include media panels (i.e., digital or static) at transit shelters that would serve as displays for offsite signage, real-time transit emergency information, and local announcements. These would provide essential services for bus riders who do not possess personal smart devices. Therefore, STAP elements that may be located on Scenic Highways designated by the Mobility Element would not result in a land use and planning conflict.

Community Plans – As analyzed in the Land Use Consistency Memo, the STAP would not conflict with relevant goals, objectives, and policies of the City's Community Plans and would support those related to the use of transit services and reduction of vehicle trips. Programs and general design guidelines for the installation of transit shelters and street furniture would also be supported by the STAP. Community plans are not regulatory in function but act as planning guides to the City. As an important planning tool, community plans provide guidelines for proposed developments and include urban

design policies for signs on private properties but do not regulate signs on public ROWs. In addition, the proposed and replacement transit shelters would be located on sidewalk areas, which are considered public ROWs and would not conflict with the land use designations of adjacent lands. No change to the roadway pavement or travel lanes are proposed as part of the STAP program elements; thus, no conflict with the street classifications in adopted Circulation Plans would occur.

Zoning Regulations – The City's Zoning Regulations in Chapter 1 of the Municipal Code prescribe the general development standards and regulations that should be followed in the improvement of parcels within the City, in accordance with their zoning classifications, variation zones, hillside zones, heights district locations, and supplemental use district designations. While the regulations do not specifically address public ROWs, sidewalk improvements, or the permitted use of sidewalks for transit shelters, the City has developed siting parameters that would be used to determine the location of transit shelters under the STAP (see Table 2-2 above). The parameters indicate that the proposed transit shelters with or without advertising displays would be generally confined to the City's commercial, industrial, parking, and open space areas. No transit shelters with or without advertising displays are proposed to be constructed or replaced under this program along the frontage of properties on Hillside Limited Streets, Hillside Local Streets, designated federal and State Scenic Highways, and at the frontage of properties in One-Family Residential zones (R1, RU, RZ2.5, RZ3, RZ4, and RW1). Thus, the STAP and the proposed replacement and new transit shelters and associated improvements would not conflict with the City's Zoning Regulations.

The STAP would also not conflict with the LAMC because the City's sign regulations do not apply to signs within the public ROWs and the LAMC provides an exemption for transit shelters (and associated signage) that allows transit shelters with signage to be placed within public ROWs. In addition, construction and maintenance activities under STAP would comply with pertinent regulations in the LAMC under the blanket permit for the STAP.

The STAP would not conflict with the LAAC because, like the CSFP, it would also be operated in accordance with the Street Furniture Revenue Fund.

Specific Plans – The City has adopted several specific plans that implement the goals and policies of the community plans and provide specific development standards and design guidelines that supersede the City's zoning regulations. As analyzed in the Land Use Consistency Memo, several specific plans contain regulations and standards for transit shelters, street furniture, and signs, and some prohibit digital displays/signs. However, some of the limitations on signs apply only on private property because they call for building permits, and building permits are not issued for structures and improvements in the public road ROW (e.g., sidewalks). The construction of transit shelters under the STAP would be subject to a blanket permit from the City, requiring compliance with relevant and applicable Specific Plan regulations, including the need to go through a design review process, if necessary. Thus, the STAP would comply with the development standards and design guidelines in adopted specific plans, as applicable to street furniture and signs, including structures and other improvements, in

the public road ROW. Implementation of mitigation measure LU-1 would ensure the STAP would not conflict with applicable specific plans.

Overlay Zones/Commercial Design Overlay Districts – The City has adopted various overlay zones, Commercial Design Overlay (CDO) districts, Streetscape Plans, HPOZ, Community Plan Implementation Overlay (CPIO) districts, Redevelopment Plans, Pedestrian Oriented District (POD), and sign districts/supplemental use districts that have specific design guidelines and development standards. Several overlay zones/districts include regulations and standards for transit shelters and digital signs. Where transit shelters would be replaced or new ones installed, they would need to be reviewed for compliance with the regulations and standards of the underlying overlay zones/districts and planning areas that are specifically applicable to street furniture and signs, including structures and other improvements, in the public road ROW, as opposed to the regulations for signs and structures on private properties. Implementation of mitigation measures LU-2 and LU-3 would ensure compliance with applicable regulations and standards for applicable overlay zones and districts.

The STAP would not conflict with the City of Los Angeles General Plan. It would also not conflict with adopted Specific Plans and other City planning documents with implementation of mitigation measures LU-1 through LU-3.

Mitigation Measures

LU-1 As provided in the individual specific plans, transit shelters (relocated or new) and associated amenities and signs to be located within the planning areas of adopted Specific Plans and Streetscape Plans shall be designed to comply (and subject to design review, if necessary) with applicable design guidelines and standards and sign regulations for street furniture and signs installed in the public road ROW prior to installation/construction.

LU-2 Transit shelters (relocated or new) and associated amenities to be located within overlay zones, Streetscape Plans, and CDO districts shall be designed to comply with applicable design guidelines and standards and sign regulations that are applicable to street furniture and signs in the public road ROW.

LU-3 Transit shelters (relocated or new) and associated amenities to be located within HPOZs shall be designed to comply with applicable guidelines and standards and sign regulations for street furniture and signs in the public road ROW as contained in individual Preservation Plans as approved by the individual Historic Preservation Boards.

Land use impacts would be less than significant after mitigation. Alternatively, transit shelters to be located within Specific Plan and Streetscape Plan areas, overlay zones/districts, CDO districts, and HPOZs that would not comply with the applicable standards and guidelines for street furniture and signs installed in the public road ROW may be subject to separate, subsequent, or individual environmental analysis and permit approval prior to construction.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) 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?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐

3.12.1 Regulatory Setting

This section describes existing laws and regulations related to mineral resources that are applicable to the project.

3.12.1.1 Federal

There are no federal regulations that specifically address impacts related to mineral resources and that are applicable to the project.

3.12.1.2 State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act of 1975 (SMARA) (in PRC Section 2710 *et seq.)* encourages the production, conservation, and protection of the State's mineral resources and seeks to minimize adverse environmental impacts on mineral resources and to allow mined lands to be restored to a usable condition after extraction activities. PRC Section 2207 also provides annual reporting requirements for all mines in the state, with the State Mining and Geology Board granted authority and obligations under this section.

In addition, SMARA mandates the classification of lands with valuable mineral resources so that land use decisions that may affect mineral-bearing lands can be made with the knowledge of these resources.

3.12.1.3 Local

Los Angeles General Plan Conservation Element

The Los Angeles General Plan Conservation Element calls for the managed production of resources, including areas containing mineral deposits and fossil fuels (i.e., oil and gas). It includes policies to allow extraction operations at appropriate sites and encourage the reuse of sand and gravel products. It also includes policies for energy conservation and petroleum product reuse; support for bans on oil drilling along the coast; and the protection of neighborhoods from the effects of oil drilling.

Los Angeles Municipal Code

Section 13.01 of the LAMC protects the City's oil resources and has established a supplemental use district – "O" Oil Drilling District, where oil fields are known to be present and drilling operations are regulated. Section 13.03 of the LAMC protects the City's mineral resources and has established a supplemental use district – "G" Surface Mining Operations District, where surface mining operations are allowed subject to a permit.

3.12.2 Existing Environment

The Los Angeles General Plan Conservation Element notes that sand and gravel extraction occurred in the Arroyo Seco and Big Tujunga Wash areas in the early 1900s, and sand and gravel resources from the adjacent mountains are available in the Tujunga alluvial fan. It identifies the locations of Mineral Resources Zones (MRZ) in the City. MRZ-2 are areas where sand and gravel extraction has occurred historically, and they are present at the eastern portion of the San Fernando Valley and around Downtown Los Angeles. The Conservation Element also shows the general locations of Oil Drilling Districts, Surface Mining Districts, and State-designated oil fields within the City.

The California Department of Conservation (CDOC) shows the Mid City Granite Open Pit at Forest Lawn Drive has been reclaimed and is no longer operational. Several mining sites are present near Tujunga Canyon. The Boulevard Open Pit is an idle sand and gravel site; the Calmat Sun Valley is closed; the Sheldon Open pit has active sand and gravel extraction operations; the Hansen Dam Quarry has not started reclamation; and the Alba Landscape Boulders has been reclaimed and is no longer operational.

There are several oil fields underlying the southern, central, and northwestern sections of the City, including the northern portion of the San Fernando Valley, the Mid-City area, near Playa del Rey, and north of San Pedro. Numerous active, plugged, and idle wells are located over these oil fields.

3.12.3 Impact Analysis

a) Would the 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.4); City of Los Angeles General Plan Conservation Element; LAMC; CDOC Wellfinder; CGS Information Warehouse: Mineral Land Classification.

Comment: A significant impact may occur if the proposed project is located in an area used or available for extraction of a regionally important mineral resource, if the project converts a regionally or locally important mineral extraction use to another use, or if the proposed project blocks or affects access to a mineral resource area.

Less than significant impact. STAP program elements would be located at existing sidewalk areas and would not affect adjacent land uses, including ongoing oil drilling and mineral extraction activities. The use of sand and gravel for the repair and repaving of sidewalk areas and the use of oil and gas resources for the operation of vehicles and equipment for STAP construction and maintenance activities and the production of shelters and sidewalk amenity components would represent a minor amount of the mineral resources in the region that is utilized for construction, vehicle and equipment operation, and industrial production in the City and the State. Impacts on regionally or Statewide-important mineral resources would be less than significant, and no mitigation is required.

b) Would the 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section E.4); City of Los Angeles General Plan Conservation Element; LAMC; CDOC Wellfinder; CGS Information Warehouse: Mineral Land Classification.

Comment: See comment above.

Less than significant impact. While the Conservation Element has identified mineral and oil and gas resources in the City, STAP program elements would be located at existing sidewalk areas and would not affect adjacent land uses, including ongoing oil drilling and mineral extraction activities. Because the transit shelter sites are generally paved and not used for mineral extraction or oil drilling, no loss of access to underlying resources would occur with the STAP. The demand for local mineral resources for construction and maintenance of the transit shelters and sidewalk amenities would be minor and is not expected to have a substantial effect on locally important mineral resources. Impacts would be less than significant, and no mitigation is required.

3.13 Noise

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project result in:				
a) Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

A Noise and Vibration Impact Analysis was prepared for the project and is provided in Attachment E. The findings of the analysis are summarized below.

3.13.1 Regulatory Setting

This section describes existing laws and regulations related to noise that are applicable to the project.

3.13.1.1 Federal

Transit Noise and Vibration Impact Assessment

The Federal Transit Administration (FTA) provides guidance on appropriate vibration limits with respect to sensitive receptors. According to FTA, vibration impacts associated with human annoyance would be significant if vibration caused by construction activity assessed at a receptor exceeded 85 VdB, a vibration velocity (Lv) level that is considered acceptable only for an infrequent number of events per day.

3.13.1.2 State

California Planning and Zoning Law

California Planning and Zoning Law requires each local government entity to adopt a Noise Element as part of its General Plan. State land use guidelines for evaluating the compatibility of various land uses as a function of community noise exposure are generally incorporated into adopted Noise Elements.

3.13.1.3 Local

City of Los Angeles General Plan Noise Element

The Noise Element identifies ambient noise levels and major noise sources (e.g., vehicles, rail systems and airports) in the City and sets goals, objectives, and policies for reducing intrusive noise and the noise impacts of development and changes in land use. The Noise Element does not specifically address transit shelters and sidewalk amenities.

City of Los Angeles Noise Ordinance

LAMC Chapter IV, Article 1, Section 41.40 and Ordinance No. 161,574 and amended Ordinance No. 156,363 is the City's Noise Ordinance and regulates noise generated at construction sites, including permissible hours of construction, and operational noise from stationary and mobile sources. LAMC Section 112.05 states that construction and industrial machinery shall not exceed a maximum of 75 A-weighted decibels (dBA) at a distance of 50 feet in a residential zone or within 500 feet of a residential zone, except where compliance is technically infeasible. In addition, LAMC Section 41.40, as referenced, restricts construction activities during different hours of the day (i.e., no person shall perform any construction or repair work that makes loud noises that disturb persons occupying sleeping quarters in any place of residence between the hours of 9:00 p.m. of one day and 7:00 a.m. of the following day).

3.13.2 Existing Environment

Currently, there are 1,884 existing transit shelters and other transit stops without shelters located within the City. Land uses near the transit stops include a wide range of categories, including residential, school, recreational, medical, commercial, public, institutional, open space/undeveloped, and industrial. The primary source of ambient noise within the transit stops are vehicle traffic on abutting streets, varying in vehicle capacity and number of travel lanes.

Ambient Noise Levels

The L.A. CEQA Thresholds Guide's Exhibit I.1-3 provides a table of presumed ambient noise levels categorized by zoning, such as residential, commercial, and industrial with day-time ambient noise levels at 50 dBA, 60 dBA, and 60–65 dBA, respectively. The ambient noise levels could range from as low as 45 dBA in some areas of the City to as high as 70 dBA in other areas.

Vibration

Vibration along roadways is typically generated by heavy trucks whose vibration level depends on vehicle type, weight, and pavement conditions. There are numerous major arterials located within the City on which there is heavy truck activity and where vibration is likely to be perceptible.

Noise Sensitive Uses

The L.A. CEQA Thresholds Guide considers noise-sensitive uses as including residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks.

3.13.3 Impact Analysis

a) Would the project result in the generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections I.1 and I.2); City of Los Angeles General Plan Noise Element; City Noise Ordinance; Noise and Vibration Impact Analysis (Parsons, 2021).

Comment: A significant impact would occur if the project exposed persons to or generated noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The City's Noise Ordinance in LAMC Section 112.05 states that construction machinery shall not exceed a maximum of 75 dBA at a distance of 50 feet in a residential zone. If the estimated construction noise level exceeds the 75-dBA threshold at 50 feet, a noise impact would be assumed to occur.

Less than significant impact with mitigation incorporated. Implementation of the STAP would generate noise during transit shelter construction and maintenance activities.

Construction Noise

Construction activities for the STAP would generate noise at the 3,000 transit shelter construction sites. The most conservative construction scenario of the transit shelters under STAP would occur over a 3- to 6-year time span, from 2022–2024 or 2027, as shown in Table 3-4 (see Section 3.3.3). The maximum daily construction activities and associated equipment use are provided in Table 3-16.

Because no construction activities would occur during the nighttime or lasting more than 10 days at any transit shelter construction site, the City's CEQA thresholds for nighttime work and construction over 10 days do not apply. However, construction activities lasting more than 1 day that would exceed existing ambient exterior noise levels by 10 dBA or more at a noise-sensitive use would be considered a significant impact.

Table 3-16. Daily Construction Activities of Construction Scenarios

Scenario	Activity Description	Duration	Daily Frequency (Sites/Day)	Crew Size/ Site	Equipment (Hours)	Maximum Equipment Operating Simultaneously	Vehicles
1	Dismantle/ Remove Existing Shelter	2 to 3 hours total (1 hour for traffic lane management)	6	3 to 5 workers 3 to 4 vehicles	Backhoe (1 hour)	2 pieces	Boom Truck
					Jackhammer (0.5 hour)	(e.g., jackhammer+ backhoe; backhoe+ skid steer)	Dump Trucks (2 per 6 sites)
					Air Compressor (0.5 hour)		Flatbed Trailer Truck
					Generator (0.5 hour)		Crew Vehicle
					Skid Steer Loader (0.5 hour)		
2	New Components Construction	2.5 days	see below	see below	see below	see below	see below
2a	Site Prep	1 day	6	3 to 7 workers 4 to 6 vehicles	Jackhammer (1 hour)	3 pieces	Boom Truck
					Backhoe (2 hours)		Dump Trucks (2 per site)
					Skid Steer (2 hours)		Flatbed Trailer Truck
					Generator (1 hour)		Crew Vehicle(s)
					Air Compressor (2 hours)		
2b	Construction	1.5 days	6	3 to 7 workers 4 to 5 vehicles	Backhoe (4 hours)	3 pieces	Boom Truck
					Air Compressor (2 hours)		Concrete Truck
					Generator (2 hours)		Flatbed Trailer Truck
					Electric/Hand Tools		Crew Vehicle(s)

Source: Noise and Vibration Impact Analysis, Parsons, 2021.

As shown, transit shelter construction and installation is planned to occur over a 2- to 3-day period. Because the project would upgrade and install transit shelters at approximately 3,000 sites across the entire City, the ambient noise levels at existing and future transit shelter sites could range from as low as 45 dBA in some areas to as high as 70 dBA in other areas, as shown in Exhibit I.1-3 of the L.A. CEQA Thresholds Guide.

Reference maximum noise levels for conventional construction equipment range between 65 and 89 dBA at a distance of 50 feet from the sound-producing source. Construction noise has been predicted using the FTA “general assessment” method that focuses on the anticipated equipment and construction duration onsite per phase. Table 3-17 presents the estimated noise levels during STAP element construction for the worst-case noise hour.

During the construction phase, the projected construction activity noise levels have been calculated to range from 75 to 78 dBA at 50 feet, which would result in a noise impact for shelter sites that are within 50 feet of a residential property. At a distance of 75 feet, the calculated construction noise levels would range from 71 to 75 dBA; therefore, it can be assumed that any residential property beyond 75 feet of a transit shelter site location would not be impacted by construction noise.

These estimated construction noise levels could be more than 10 dB above the ambient noise levels for residential properties and commercial properties with noise-sensitive land uses. At a distance of 400 feet, the predicted construction noise levels would be reduced enough due to distance attenuation such that they would be below the 10-dB limit. Therefore, an impact could occur at residential and commercial properties with noise-sensitive land use that are within 400 feet of a transit shelter construction site.

Construction activities would not use all of the listed construction equipment simultaneously, and only specific equipment would be used at any given time to complete the construction tasks. This would assist in reducing the maximum instantaneous noise experienced by any nearby noise-sensitive uses but may not lower the hourly equivalent noise levels below the 75 dBA threshold. Implementation of the common potential mitigation measures set forth in the *City of Los Angeles, Bureau of Engineering, Master Specifications, Division 01, General Requirements, Section 01562, Part 1.1.C* would minimize the noise impacts to less than significant levels.

Table 3-17. Calculated Construction Noise Levels for STAP

Equipment Type	No. of Items	Maximum Equipment Noise Levels at 50 ft dBA	Hourly Equivalent Noise Levels at 50 ft, dBA	Hourly Equipment Usage Percentage	Percent Time at Full Power	Effective Equipment Usage Factor Percentage
Shelter Dismantling and Removal						
Dismantling and removal of existing transit shelters, kiosks and associated amenities						
Backhoe (Small, rubber-tired)	1	71	59	33%	21%	7%
Skid Steer Loader	1	80	69	17%	43%	7%
Jackhammer	1	89	74	17%	21%	4%
Air Compressor	1	65	54	17%	43%	7%
Generator	1	81	70	17%	50%	8%
Boom Truck	1	73	66	67%	30%	20%
Dump Truck	1	75	71	67%	59%	39%
Flatbed truck	1	73	60	17%	30%	5%
		Combined $L_{eq}(h)$	**78**			
Shelter Construction and Installation						
Site preparation, including removal of existing sidewalks, foundations, and utility connections						
Backhoe (Small, rubber-tired)	1	71	58	25%	21%	5%
Skid Steer Loader	1	80	70	25%	43%	11%
Jackhammer	1	89	73	13%	21%	3%
Air Compressor	1	65	55	25%	43%	11%
Generator	1	81	69	13%	50%	6%
Boom Truck	1	73	64	38%	30%	11%
Dump Truck	1	75	68	38%	59%	22%
Flatbed truck	1	73	56	6%	30%	2%
		Combined $L_{eq}(h)$	**77**			
Installation of a new/refurbished and renewed/ transit shelter or a new transit shelter at a bus stop that previously or did not previously have a shelter or amenities						
Backhoe (Small, rubber-tired)	1	71	61	50%	21%	11%
Air Compressor	1	65	55	25%	43%	11%
Generator	1	81	72	25%	50%	13%
Power Tools (Impact Driver)	1	80	69	25%	30%	8%
Boom Truck	1	73	62	25%	30%	8%
Ready-Mix Concrete Truck	1	72	62	25%	43%	11%
Flatbed truck	1	73	56	6%	30%	2%
		Combined $L_{eq}(h)$	**75**			

Source: Noise and Vibration Impact Analysis, Parsons, 2021.

Mitigation Measure

NOI-1: When applicable (i.e., at instances when noise levels may approach or exceed City noise criteria), the following noise control measures should be adhered to:

- Construction or use of noise barriers, enclosures, or blankets
- Use of low noise, low vibration, low emission-generating construction equipment (e.g., [quieter] Tier 4 engines), as needed
- Maintenance of mufflers and ancillary noise abatement equipment
- Scheduling high noise-producing activities during periods that are least sensitive when most people are at work during daytime hours
- Routing construction-related truck traffic away from noise-sensitive areas
- Reducing construction vehicle speeds

Construction noise impacts would be less than significant after mitigation.

Maintenance and Operations Noise

During long-term maintenance and operations, STAP program elements features would not generate any noise at the existing and future transit shelter sites and transit lines. No permanent noise impacts would occur. The project consists of adding or improving transit shelters along existing transit service lines, and no change transit services is proposed. Thus, there is no assumed increase in transit-related or ambient noise due to implementation of the STAP program elements.

Maintenance of the transit shelters would be performed on an ongoing basis over a 10-year period, with two optional 5-year extensions. Maintenance activities would consist of weekly and some biannual deep cleaning at scattered shelter locations. Table 3-18 presents examples of calculated noise levels for instances when noise-generating equipment may need to be employed for maintenance activities during the operational life span of the transit shelters.

Deep cleaning maintenance would likely be the only activity that has the potential to result in a noise impact. The use of power washers for deep cleaning would generate a noise level of approximately 75 dBA at a distance of 50 feet, which would not exceed the City's noise limit of 75 dBA. Operation noise impacts would be less than significant, and no mitigation is required.

Table 3-18. Calculated Operational Maintenance Noise Levels for STAP

Equipment Type	No. of Items	Maximum Equipment Noise Levels at 50 ft dBA	Hourly Equivalent Noise Levels at 50 ft, dBA	Hourly Equipment Usage Percentage	Percent Time at Full Power	Effective Equipment Usage Factor Percentage
Shelter Operations and Maintenance						
Cleaning of shelter, associated program elements, and sidewalk area on a regularly scheduled (generally twice per week) and emergency basis, including use of power-washing equipment						
Utility Truck	1	69	64	100%	30%	30%
Power Washer	1	80	75	50%	59%	30%
		Combined $L_{eq}(h)$	**75**			
Shelter repair work, including fixing broken ad panels, shelter structures, benches, litter receptacles, and other program elements						
Utility Truck	1	69	64	100%	30%	30%
Power Tools (Impact Driver)	1	80	72	50%	30%	15%
		Combined $L_{eq}(h)$	**72**			
Minor utility repair, such as electrical and utility box repairs						
Utility Truck	1	69	64	100%	30%	30%
Boom Truck	1	73	68	100%	30%	30%
		Combined $L_{eq}(h)$	**69**			

Source: Noise and Vibration Impact Analysis, Parsons, 2021.

b) Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections I.1 and I.2); City of Los Angeles General Plan Noise Element; City Noise Ordinance; Noise and Vibration Impact Analysis (Parsons, 2021).

Comment: A significant impact would occur if the project exposed persons to or generated excessive ground-borne vibration or ground-borne noise levels.

Less than significant impact. The removal and dismantling of an existing concrete sidewalk is the only construction activity with a potential for creating ground vibration. Any jackhammering of sidewalks occurring within the transit shelter construction sites would not generate excessive vibration. Some faint ground-borne noise may be possible if there is an adjacent building adjoined with a sidewalk to be replaced as part of the project, but it would likely not be perceptible without the use of sensitive vibration measuring equipment. Vibration impacts would be less than significant, and no mitigation is required.

c) For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?

Reference: L.A. CEQA Thresholds Guide (2006) (Section I.4); City of Los Angeles General Plan Noise Element and Community Plans; City Noise Ordinance; Noise and Vibration Impact Analysis (Parsons, 2021).

Comment: A significant impact would occur if the project exposed people residing or working in the project area to excessive noise levels due to the project site being located within an airport land use plan or within 2 miles of a public airport where such a plan has not been adopted.

No Impact. Existing and new transit shelters may be located near an airstrip or airport, but the transit shelter construction and routine maintenance activities would not expose people residing or working in the project area to excessive noise levels related to airport and aircraft operations. Construction and maintenance crews, as well as transit riders, would only be at the transit shelters for short periods of time. No impacts related to noise from aircraft operations would occur, and no mitigation is required.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) 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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.14.1 Regulatory Setting

This section describes existing laws and regulations related to population and housing that are applicable to the project.

3.14.1.1 Federal

Federal regulations related to population and housing are not applicable to this project.

3.14.1.2 State

State regulations related to population and housing are not applicable to this project.

3.14.1.3 Regional

SCAG Plans and Programs

The City is located within the jurisdiction of SCAG, a Joint Powers Agency established under California Government Code Section 6502 *et seq.* Pursuant to federal and State law, SCAG serves as a Council of Government, a Regional Transportation Planning Agency, and the Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial counties. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan, RTP, and Regional Housing Needs Assessment (RHNA) in coordination with other State and local agencies. These planning documents include population, employment, and housing projections for the region and its 13 subregions.

The STAP would construct new and upgraded transit shelters within the Los Angeles subregion.

SCAG is responsible for providing demographic projections for use by local agencies and public service agencies and utility companies in projecting future service demands. Projections in SCAG's 2020–2045 RTP/SCS serve as the basis for demographic estimates. The findings regarding growth in the region are consistent with the methodologies prescribed by SCAG and reflect SCAG's goals and procedures.

SCAG data are periodically updated to reflect changes in development activities and the planning priorities of local jurisdictions (e.g., zoning changes). Through these revisions, public agencies have advance information regarding changes in growth that must be addressed in local planning. Changes in the growth rates are reflected in the new projections for use in service and utilities planning through the long-term time horizon.

3.14.1.4 Local

City of Los Angeles General Plan Housing Element

The Housing Element outlines the City's goals, objectives, policies, and programs for the conservation, preservation, and provision of adequate housing to meet the existing and future needs of the City.

3.14.2 Existing Environment

The California Department of Finance (DOF) estimates the City's January 2021 population at 3,923,341 persons, which includes 3,847,606 persons in households and 75,735 persons in group quarters. The City's housing stock consists of 1,535,606 dwelling units, of which 562,721 are single-detached units, 88,926 are single-attached units, 140,936 are two to four units; 732,939 are five or more units, and 10,084 are mobile homes. The City's housing stock has a 7.7 percent vacancy rate, and the average household size is 2.72 persons per household.

Resident population and housing stock by community is provided in Table 3-19.

Table 3-19. Population and Housing Stock by Community

Community	2019 Population	2019 Housing Stock
Arleta/Pacoima	106,071	23,826
Bel Air/Beverly Crest	18,682	9,107
Boyle Heights	89,529	24,417
Brentwood/Pacific Palisades	56,950	27,352
Canoga Park/Winnetka/Woodland Hills/West Hills	194,969	70,098
Central City	44,842	31,067
Central City North	26,085	8,601
Chatsworth-Porter Ranch	104,807	36,931

Table 3-19. Population and Housing Stock by Community

Community	2019 Population	2019 Housing Stock
Encino/Tarzana	77,720	32,525
Granada Hills/Knollwood	64,238	21,473
Harbor Gateway	42,464	13,390
Hollywood	195,709	108,423
Mission Hills/Panorama City/North Hills	149,168	41,640
North Hollywood/Valley Village	138,659	59,104
Northeast Los Angeles	242,790	81,432
Northridge	70,733	24,281
Palms/Mar Vista/Del Rey	113,794	55,072
Reseda/West Van Nuys	116,746	37,572
San Pedro	79,502	33,002
Sherman Oaks/Studio City/Toluca Lake/Cahuenga Pass	86,605	43,560
Silver Lake/Echo Park/Elysian Valley	71,460	30,935
South Los Angeles	288,274	87,914
Southeast Los Angeles	301,512	74,232
Sun Valley/La Tuna Canyon	85,311	24,969
Sunland/Tujunga/Shadow Hills/Lake View Terrace/East La Tuna Canyon	60,854	22,558
Sylmar	81,628	22,570
Van Nuys/North Sherman Oaks	168,217	63,725
Venice	35,873	21,293
West Adams/Baldwin Hills/Leimert	172,149	71,653
West Los Angeles	78,333	39,192
Westchester/Playa Del Rey	62,015	28,643
Westlake	120,455	44,294
Westwood	55,829	21,528
Wilmington/Harbor City	82,245	24,211
Wilshire	280,597	132,040
City of Los Angeles Total	3,966,936	1,493,108

Source: City of Los Angeles Community Reports, 2019.

In September 2020, SCAG projected the population of the City to reach 4,771,000 persons by the year 2045.

Existing transit shelters are located on public streets throughout the various Council districts and communities. The land uses surrounding each of the existing and future

transit shelter sites include residential, commercial, industrial, manufacturing, open space, and public facilities. There are no dwelling units on City sidewalks and transit shelters.

3.14.3 Impact Analysis

a) Would the 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)?

Reference: L.A. CEQA Thresholds Guide (2006) (Section J.1); City of Los Angeles General Plan and Community Plans.

Comment: The inducement of substantial unplanned growth and development from a project may have a significant impact on housing, roads, and other infrastructure, as well as environmental resources, by creating growth that was not previously anticipated in the General Plan or relevant Community Plan.

No impact. The STAP does not include construction or occupancy/operation of any new residential or commercial businesses; therefore, it would not result in a direct population increase from the construction of new homes or an increase in the employment base due to new businesses. No extension of roads or other infrastructure that could potentially induce population growth is proposed or would be required to implement the STAP.

Implementation of STAP would involve the use of 3 to 7 workers for a period of 2 to 3 days per shelter during the construction period. The number of maintenance crews to be used for STAP implementation throughout the City would range from 40 to 62 persons. Many of these workers are currently working on maintaining the existing street furniture under the current program. The increase of less than 50 workers to be recruited for the STAP program would not induce significant population growth in either the City or in southern California.

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

Reference: L.A. CEQA Thresholds Guide (Sections J.1 and J.2); City of Los Angeles General Plan, including the Housing Element.

Comment: A significant impact may occur if the proposed project displaced substantial numbers of existing housing, necessitating the construction of replacement dwelling units elsewhere.

No impact. The new or upgraded transit shelters and other sidewalks amenities would be located entirely within the sidewalk areas of the public ROWs, where no dwelling units are present and where people do not permanently reside. The removal of existing housing or the need for replacement housing is not required for the project's

implementation. No impacts related to displacement would occur, and no mitigation is required.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) 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 for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

3.15.1 Regulatory Setting

This section describes existing laws and regulations related to public services that are applicable to the project.

3.15.1.1 Federal

There are no federal regulations that specifically address impacts related to public services, such as those concerning police and fire protection services that apply to the project. Schools are regulated by the State and local school districts and, likewise, no federal regulations strictly apply to the provision of parks or other public facilities.

3.15.1.2 State

California Fire Code

The California Fire Code is a component of the California Building Code and includes fire safety requirements related to the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a

prescribed distance from occupied structures in wildfire hazard areas. The California Fire Code applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. The City Fire Code includes mandates from the California Fire Code.

California Strategic Fire Plan

The California Department of Forestry and Fire Protection (CalFire) has developed a comprehensive plan for wildland fire protection in California. The Strategic Fire Plan for California was developed in coordination between the State Board of Forestry and Fire Protection and CalFire and serves as the State's road map for reducing the risk and impacts from wildland fires. The State's Strategic Fire Plan is updated every 8 to 10 years. The 2018 Strategic Fire Plan has goals for analyzing the fire risk, supporting land use planning, community preparedness planning, public education, integrating landowner fuels management, identifying fire suppression resources, increasing fire prevention efforts, and post-wildfire recovery.

California Education Code

LAUSD provides school services in the City and is subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State also provides funding through a combination of sales and income taxes. Pursuant to Proposition 98, the State is responsible for the allocation of educational funds that are acquired from property taxes. In addition, the governing board of a school district is authorized to levy a fee, charge, dedication, or other requirement against new development within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities necessary to serve that development.

3.15.1.3 Local

City of Los Angeles General Plan Framework Element

The Framework Element includes an Infrastructure and Public Services chapter, which sets goals, objectives, and policies for fire protection and emergency medical services (EMS) in the City. The objectives and policies call for every neighborhood to have the necessary level of fire protection service, EMS, and infrastructure. It also sets a standard for response distance from the fire station to the destination location at 1.5 miles, which is consistent with the specifications for response distances in the LAMC.

The Framework Element also states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Objective 9.13 and Policy 9.13.1 of the Infrastructure and Public Services Chapter require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future police protection needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet such needs.

City of Los Angeles General Plan Safety Element

The Safety Element recognizes that most jurisdictions rely on emergency personnel to respond to and handle emergencies. The Safety Element establishes specific policies and objectives that emphasize hazard mitigation, emergency response, and disaster recovery. It serves as a guide for the construction, maintenance, and operation of fire protection facilities in the City. It sets forth policies and standards for fire station distribution and location, fire suppression water flow (or "fire flow"), firefighting equipment access, emergency ambulance services, and fire prevention activities.

City of Los Angeles Municipal Code

Chapter 5 of the LAMC addresses Public Safety and Protection. Article 2, Police and Special Officers, in Chapter 5 contains regulations governing administrative issues, such as requirements for police badges and uniforms. Article 7 contains the Fire Code for the City. The Fire Code contains regulations to safeguard life and property from fire, explosion, panic, or other hazardous conditions that may arise in the City. It also includes the requirements for Hazardous Materials Release Response Plans and Inventory Statements and the storage, management, and disposal of hazardous materials, such as chemical USTs/ASTs, ACM/asbestos-containing building material, and various other combustible and flammable materials.

Los Angeles Fire Department Strategic Plan 2018-2020

LAFD's Strategic Plan 2018-2020 (A Safer City 2.0) focuses on five overarching goals over a 3-year planning period:

- Provide exceptional public safety and emergency service
- Embrace a healthy, safe, and productive work environment
- Capitalize on advanced technology
- Enhance LAFD sustainability and community resiliency
- Increase opportunities for personal growth and professional development

3.15.2 Existing Environment

Fire Protection Services

LAFD serves as the City's full-spectrum life safety agency, providing fire prevention, firefighting, medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. LAFD operates out of 106 fire stations in the City.

Police Protection Services

The Los Angeles Police Department (LAPD) provides police protection and law enforcement services in the City and has 4 bureaus, with 21 service areas, each served by 21 community police stations. The LAPD also includes a variety of support systems,

including the Direct Support Division, Special Operations, Municipal Division, SWAT, K-9, and Mounted Units.

School and other Public Services

LAUSD provides educational services to students in the City, several unincorporated sections of Los Angeles County, and all or parts of 31 smaller municipalities. It serves students in kindergarten through 12th grade in more than 1,000 schools and more than 200 independently operated public charter schools. In addition, there are various private schools, daycare centers, after school centers, and other educational centers in the City. The City's Department of Recreation and Parks operates and manages 444 separate park sites throughout the City, ranging in size from the 4,210-acre Griffith Park to the 0.06-acre Gramercy Park.

3.15.3 Impact Analysis

a) Would the 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 for any of the public services:

i) Fire protection?

Reference: L.A. CEQA Thresholds Guide (Section K.2); City of Los Angeles General Plan Safety Element; Community Plans.

Comment: A significant impact would occur if the project required the addition of a new fire station or the expansion, consolidation, or relocation of existing fire stations to maintain service.

Less than significant impact. The STAP would not generate population growth or increase the number of people requiring fire protection services at project sites because the project only involves the dismantling, removal, refurbishing, and installation of transit shelters and sidewalk amenities. The transit shelters would be small structures and would be designed and constructed in compliance with the City's Fire Code and standard plans and OSHA requirements. In addition, regular maintenance activities would ensure program elements and mechanical equipment are in good operating condition, along with the proper storage and use of any flammable and hazardous materials, and cleanup of spills per LAFD regulations. Demand for fire protection services during construction and maintenance activities is expected to be limited.

Construction activities are not expected to block emergency access for fire protection equipment. Any temporary disruption in transportation flow due to the construction of transit shelters, which is anticipated to last up to 2.5 days, would not require roadway closures and detours that could impact LAFD response times. Temporary lane closures or other any other project-related activity that disrupts the flow of vehicles, pedestrians, or bicyclists, flag persons, and/or traffic devices would be put in place prior to such

action. In addition, routine maintenance activities are not anticipated to last more than 2 hours and would not affect emergency access for fire protection equipment. No change in emergency response times is expected.

In limited instances where trash receptacles catch on fire or a person in or near a transit shelter requires emergency medical technician (EMT) services, those occasional service demands are likely to be performed sporadically in the future as under existing conditions. These are not likely to increase directly due to the implementation of STAP. As such, the project is not expected to require additional fire protection facilities. Impacts on fire protection services would be less than significant, and no mitigation is required.

ii) Police protection?

Reference: .A. CEQA Thresholds Guide (Section K.2); City of Los Angeles General Plan Safety Element; Community Plans.

Comment: A significant impact would occur if the proposed project resulted in an increase in demand for police services that would exceed the capacity of the police department responsible for serving the site.

Less than significant impact. The project would not increase the number of people requiring police services during construction, operation, or maintenance of transit shelters and sidewalk amenities. STAP program elements would be placed in outdoor and open-to-the-public settings and would be designed and constructed to withstand vandalism and graffiti.

There may be a periodic need for police officers to respond to drunken or disorderly behavior, reports of personal theft, tagging, etc. that may occur near or at a transit shelter location, as is currently the case. While maintenance activities would include repairs and graffiti removal, as necessary, police service demand is not likely to increase directly due to the implementation of STAP. As such, the project is not expected to require additional police protection facilities. Impacts on police protection services would be less than significant, and no mitigation is required.

Although no streets would be completely closed to vehicular traffic, intermittent lane closures or curb restrictions of upwards of 2.5 days at each transit shelter construction site may occur during the installation of individual transit shelters and sidewalk amenities. No roadway closures or detours are proposed that could impact LAPD response times. Temporary lane closures or any other project-related activity that disrupts the flow of vehicles, pedestrians, or bicyclists, flag persons, and/or traffic devices would be put in place prior to such action. In addition, routine maintenance activities are not anticipated to last more than 2 hours and would not affect LAPD emergency access. No change in the emergency response times is expected. Impacts on police protection services would be less than significant, and no mitigation is required.

iii) Schools?

Reference: L.A. CEQA Thresholds Guide (Section K.3); LAUSD Local District Map.

Comment: A significant impact would occur if the proposed project included substantial employment or population growth that would generate demand for school facilities that exceeded the capacity of the school district responsible for serving the project site.

No impact. School service needs are related to the number and age of school-age residents. Because the project does not propose new housing units nor would it add residents to the City, it has no effect on resident population and no change in current demand on the City's educational facilities. As such, no impact to schools would occur as a result of implementing the project. No mitigation is required.

iv) Parks?

Reference: L.A. CEQA Thresholds Guide (Section K.4.), City of Los Angeles General Plan, including the Open Space Element, and Community Plans

Comment: A significant impact would occur if the recreation and park services available could not accommodate the population increase resulting from implementation of the project and new or physically altered facilities were needed.

No impact. Residential development typically has the greatest potential to create a demand for recreational facilities and result in impacts to parks because it is these developments that generate a permanent increase in resident population. The project does not include any residential or commercial development uses, and it would not generate any new permanent residents or employees that would increase the demand for local and regional park facilities. Furthermore, transit shelter construction and maintenance activities at each shelter site would be limited and would not increase the demand for parks. No impacts would occur, and no mitigation is required.

v) Other public facilities?

Reference: L.A. CEQA Thresholds Guide (Section K.5); City of Los Angeles General Plana and Community Plans.

Comment: A significant impact would occur if the project resulted in the need for new or altered public facilities, such as libraries, due to population or housing growth.

No impact. Implementation of the STAP would not result in a direct or indirect increase in the City’s resident population. Users of the new or upgraded transit shelters and sidewalk amenities would not increase the demand for libraries and other public facilities. Therefore, there would be no need for the construction of additional public facilities, and no impact would occur. No mitigation is required.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
a) Would the 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?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

3.16.1 Regulatory Setting

This section describes existing laws and regulations related to recreation that are applicable to the project.

3.16.1.1 Federal

There are no federal regulations that specifically address impacts related to recreation and are applicable to the project.

3.16.1.2 State

Quimby Act

Section 66477 of the California Government Code (or Quimby Act) establishes the criteria for the determination of land dedication requirements and in-lieu fees from land subdivisions, based on specific park standards.

3.16.1.3 Local

Open Space Plan – Open Space Element

The Open Space Element serves as a guide for the identification, preservation, conservation, and acquisition of open space in the City. It sets goals, objectives, policies, standards, and criteria for publicly owned and privately owned open space and recreational uses.

Public Facilities and Services Element

The Public Facilities and Services Element includes the Major Equestrian and Hiking Trails Plan for the acquisition, construction, and maintenance of equestrian and hiking trails in the City and the Public Recreation Plan, which calls for the development of public recreational facilities. The Public Recreation Plan also includes service standards and goals for the provision of recreational facilities and operations.

Los Angeles Municipal Code

Section 19.17 of the LAMC sets a park fee for subdivisions in accordance with the Quimby Act, as well as park mitigation fees for non-subdivisions. Fees collected are then used for the development of new parkland to serve the developments.

3.16.2 Existing Environment

There are various public and private parks and recreational facilities covering more than 16,000 acres throughout the City. These include 444 park sites, with hundreds of athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, 9 dog parks, and 187 summer youth camps. In addition, the City includes portions of the Santa Monica Mountains National Recreation Area, Kenneth Hahn State Recreation Area, Griffith Park, and other State parks and public open spaces and has numerous private recreational facilities.

3.16.3 Impact Analysis

a) Would the 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.4); City of Los Angeles Open Space Element and Public Facilities and Services Element; Los Angeles Department of Recreation and Parks (https://www.laparks.org/).

Comment: Based on the L.A. CEQA Thresholds Guide (Section K.4), the determination of whether a project results in a significant impact on recreation and parks would be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., onsite recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

No impact. The STAP would support the use of transit services throughout the City but would not lead to population growth. No residents, employees, or visitors would be

directly generated by the STAP or would be introduced at transit shelter locations such as to create a demand for recreational facilities and parks. In addition, the use of the transit shelters would not have a direct link to an increase in the use of adjacent recreational facilities and parks. No bikeways or trails would be displaced by the STAP. No impacts on existing parks and recreational facilities would occur, and no mitigation is required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.4); City of Los Angeles Open Space Element and Public Facilities and Services Element.

Comment: A significant impact may occur if the proposed project would require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

No impact. STAP program elements would include transit shelters and associated sidewalk amenities, such as shade structures, benches, bike racks, trash/recycling receptacles, digital displays, interactive information kiosks, vending kiosks, urban panels, and eLockers. No recreational facilities are proposed, and no existing recreational facilities at the sidewalk areas would be displaced, replaced, or altered. No impacts related to the construction of recreational facilities would occur, and no mitigation is required.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access	☐	☐	☒	☐

A Transportation/Traffic Impact Assessment was prepared for the project and is provided in Attachment F. For the purposes of assessing the traffic impacts of the STAP, the construction and operation traffic trip generation arising from the project were qualitatively evaluated. In determining the level of significance, the assessment assumed that the construction and continuing maintenance activities of the project would comply with relevant City regulations, ordinances, and guidance. The findings of the assessment are summarized below.

3.17.1 Regulatory Setting

This section describes existing laws and regulations related to transportation that are applicable to the project.

3.17.1.1 Federal

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the ADA have been codified in Title 42 of the U.S.C. Title III prohibits discrimination on the basis of disability in “places of public accommodation” (businesses and nonprofit agencies that serve the public) and “commercial facilities” (other businesses). The regulations promulgated to implement ADA include *Appendix A to Part 36 (Standards for Accessible Design)*, establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an

existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

3.17.1.2 State

Senate Bill 743

SB 743 streamlines the review of traffic impacts under CEQA for development projects, including infill projects in transit priority areas to promote active transportation and the reduction of GHG emissions. It adds Chapter 2.7: Modernization of Transportation Analysis for Transit Oriented Infill Projects to the CEQA Statute (Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, SB 743 mandates that alternative metric(s) for determining impacts relative to transportation shall be developed to replace the use of Level of Service (LOS) in CEQA documents. Under SB 743, the focus of transportation analysis changes from vehicle delay to VMT.

VMT Guidelines

The December 2018 updates to the State CEQA Guidelines establish VMT as the primary metric for evaluating a project's impacts on the environment and transportation system. The revised guidelines require that a project's environmental assessment must assess and disclose whether it conflicts or is inconsistent with local plans or policies. The revised guidelines also state, among other things, that "transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less-than-significant transportation impact."

The Office of Planning and Research's (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* provides recommendations regarding significance thresholds for development projects with common land use types, for general plans, and for transportation projects. It lists more than two dozen types of transportation projects that would most likely not lead to a substantial or measurable increase in vehicle travel and therefore should not require an induced travel analysis. Among them are "rehabilitation, maintenance, replacement, safety and repair projects designed to improve the condition of existing transportation assets ([…] pedestrian facilities) and that do not add additional motor vehicle capacity." Other relevant considerations may include the effects of the project on transit and nonmotorized travel.

3.17.1.3 Regional

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG's RTP/SCS is a long-range visioning plan that balances future mobility and transportation needs with economic, environmental, and public health goals. The RTP/SCS consists of a vision for the region's future and is developed with input from local governments, County Transportation Commissions (CTCs), tribal governments, nonprofit organizations, businesses, and local stakeholders within the region.

There are more than 4,000 transportation projects from local plans identified in the 2020–2045 RTP/SCS, including highway improvements, railroad grade separations, bicycle lanes, new transit hubs, replacement bridges, and pedestrian improvements. These future investments would reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone.

Los Angeles County Congestion Management Program

The Los Angeles County Congestion Management Program (CMP) is a coordinated approach to managing and decreasing traffic congestion by linking the various transportation, land use, and air quality planning programs throughout the County. The 2010 CMP for Los Angeles County links local land use decisions with their impacts on regional transportation. The CMP identifies a system of highways and roadways and establishes a minimum LOS performance measurements of LOS E (except where the 1992 base year LOS is worse than E, in which case base year LOS is the standard) for highway segments and key roadway intersections on this system. A traffic impact analysis (TIA) is required for projects that generate at least 50 new trips at CMP monitoring intersections or 150 one-way trips on mainline freeway monitoring locations during either the AM or PM peak hour on weekdays.

3.17.1.4 Local

City of Los Angeles Community Plans

The City's 35 Community Plans comprise the Land Use Element of the General Plan. While the General Plan sets out a long-range vision and guide to future development, the Community Plans address specific, neighborhood-level land use, transportation, and other relevant policies and implementation strategies necessary to achieve the General Plan objectives. Policies and objectives in these plans that pertain to transportation focus on increasing transit use and alternative transportation, with continued improvements to the public transportation and circulation system.

Mobility Plan 2035

The Mobility Plan 2035 is an update to the City's General Plan Transportation Element and provides the policy foundation for achieving a transportation system that balances the needs of all road users. The Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how future generations of residents interact with their streets. The Mobility Plan also contains policies that pertain to maintaining safe and attractive sidewalks.

Los Angeles Municipal Code

LAMC Section 12.37 contains requirements related to highway and collector street dedication and improvement. LAMC Section 17.05 contains standards that expand the role of the Street Standards Committee and reflect the City's new focus on complete streets. LAMC Section 62.61 states that temporary lane closures resulting from non-emergency construction along major and secondary highways or collector streets would

be limited to off-peak hours. Permits may be issued on a case-by-case basis to provide exemption.

3.17.2 Existing Environment

Regional Access

The City has a freeway network that includes Interstates, United States Highways, and State Routes. Bicycles and pedestrians are not allowed on freeways, but they are allowed on State highways that function as arterial roads. Portions of State highways, including Pacific Coast Highway (SR-1), Santa Monica Boulevard (SR-2), and Venice Boulevard (SR-187), are currently designated as part of the citywide bikeway network. Freeways and State highways also accommodate transit service vehicles.

Local Roadway Network

The City has approximately 7,500 miles of public streets that accommodate a variety of motorized and nonmotorized vehicles, including private motor vehicles, taxis, freight vehicles, transit vehicles, and bicycles. The Mobility Plan 2035 includes numerous functional classifications for these streets: Boulevard I, Boulevard II, Avenue I, Avenue II, Avenue III, Collector Street, Industrial Collector Street, Local Standard, Local Limited, Industrial Local, Pedestrian Walkway, Shared Street, Access Roadway, One-Way Service Road- Adjoining Arterial Streets, Bi-Directional Service Road-Adjoining Arterial Streets, Hillside Collector, Hillside Local, and Hillside Limited Standard. Most of the Boulevard, Avenue, and Collector Street roadway network within the City is laid out in a grid pattern, and roadway users generally have multiple route options for traveling through the City.

Emergency Access

California law requires that drivers yield the ROW to emergency vehicles and remain stopped until emergency vehicles have passed. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of emergency vehicles. LAFD, in collaboration with LADOT, has developed a Fire Preemption System that automatically turns traffic lights to green for emergency vehicles traveling through designated intersections in the City.

Public Transit Services

The City is served by multiple transit operators, with Metro as the primary transit operator within the City. Metro operates local bus, rapid bus, busway service, light rail, and heavy rail throughout the County and surrounding areas. Local jurisdictions, including the City, operate additional transit services. LADOT operates local DASH service, as well as Commuter Express bus routes. Several other municipal bus operators provide additional transit service connecting the City to neighboring jurisdictions and counties.

Bicycle Facilities

In the City, bikes are legally permitted to operate on any Boulevard, Avenue, Collector Street, or Local Street with or without specific bicycle lane designation. LAMC Section 56.15 prohibits the use of bicycles, unicycles, skateboards, carts, wagons, or any other device moved exclusively by human power, on sidewalks in a "willful or wanton disregard for the safety of persons or property."

3.17.3 Impact Analysis

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?

Reference: L.A. CEQA Thresholds Guide (2006) (Sections L.1 through L.4 and L.6 through L.8); LADOT Transportation Assessment Guidelines*;* Los Angeles County Congestion Management Program; City of Los Angeles General Plan; Mobility Plan 2035; Transportation/Traffic Impact Assessment (Parsons, 2021).

Comment: A significant impact would occur if the proposed project conflicted with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Less than significant impact. Construction and operation of the new and upgraded transit shelters under STAP would generate vehicle trips. However, construction and maintenance activities associated with the project would occur at scattered sites across the entire City, and the effect on traffic would not be considered additive. Impacts would not be based on citywide activity because of the geographic distribution of construction sites.

Construction Trip Generation

Based on the Construction and Implementation Scenarios described in Section 2.6, construction activity would typically occur Monday through Friday, with construction crews arriving at construction sites around 7:00 a.m. Construction start times may be delayed to 9:00 a.m. for sites in busy areas without on-street parking.

Dismantling, removal, and relocation of existing transit shelters (Scenario 1) and the placement of new or refurbished shelters at new locations/bus stops that currently do not have transit shelters (Scenario 2) are prototypical construction scenarios. Each dismantling/removal of an existing shelter would be unique, and the construction needs would vary depending on several factors including, but not limited to, the condition of the shelter, the adjacent land uses, how busy the adjacent street is, the level of pedestrian traffic, and whether utilities need to be moved/abandoned.

The most conservative construction scenario of the transit shelters under STAP would occur over the first 3- to 6-year time span from 2022–2027. Table 3-4 above illustrates the anticipated improvements of the STAP during the first 3 years of the program. Table

3-16 above summarizes the anticipated daily construction activities that would likely occur for each construction scenario for the STAP.

For analysis purposes, maximum daily construction of 18 sites per day is assumed during the first year of the 3-year improvement period, from 2022–2024 under the most conservative scenario. Construction Scenario 1 activity is anticipated to take an average of 2 to 3 hours to complete, while Construction Scenario 2 activities are anticipated to take 2.5 workdays to complete. Construction Scenario 1 and Construction Scenario 2 may be occurring simultaneously throughout the City at various sites at any given time.

With respect to construction activities, the number of worker crews per site throughout the City is anticipated to be 3 to 5 workers for Construction Scenario 1 and 3 to 7 workers each for Construction Scenarios 2a and 2b, as shown in Table 3-20. Up to 24 vehicle trips to the 6 construction sites could occur daily for Scenario 1; up to 36 vehicle trips to the 6 construction sites could occur daily for Scenario 2a; and up to 30 vehicle trips to the 6 construction sites could occur daily for Scenario 2b. These vehicle trips would be timed to avoid peak hours as feasible.

Table 3-20. Construction-Period Daily Trip Generation Estimates by Scenario (assuming maximum of 18 sites/day during Year 1/2022)

Scenario	Activity	Duration (Days)	Number of Sites	Workers/ Site	Vehicles/ Site	Daily Vehicle Trips	Daily VMT/ Site
1	Dismantle/Remove Existing Shelter	1 (2 to 3 hours each)	6	5	4	24	67
2	New Components Construction	2.5	see below	see below	see below	see below	see below
2a	Site Preparation	1	6	7	6	36	120
2b	Construction	1.5	6	7	5	30	100

Source: Transportation/Traffic Impact Assessment, Parsons 2021.

Table 3-21 shows the citywide total construction period daily trip generation estimates by year. For the first year of the 3-year construction period, up to 90 daily vehicle trips deriving from construction activities could occur. For the second and third years, up to 75 daily vehicle trips could occur. It should be noted that trip generation would be geographically dispersed throughout the City, and their effects would not be confined to one area at a time. With approximately four to six vehicle trips per work site, impacts to existing traffic at each site and the surrounding streets would be minimal.

Table 3-21. Construction-Period Daily Trip Generation Estimates by Year

Year	Maximum Daily Improvements	Citywide Maximum Daily Vehicle Trips
1	6	90
2	5	75
3	5	75

Source Transportation/Traffic Impact Assessment, Parsons 2021.

As shown in Table 3-21, the construction activities for the STAP are considered a low trip generator, with less than 250 daily vehicle trips and less than 1,000 VMT per site. The LADOT guidelines indicate that a project with a net increase below 250 daily trips is not required to undertake further traffic study, and that a project generating a net increase of less than 250 trips per day does not have the potential to result in significant traffic impacts. As such, a traffic study is not required for the project.

In addition, STAP elements would be located on sidewalk areas and would only temporarily block traffic, on-street parking, and/or bicycle lanes during construction. As standard City practice, construction activities would have to comply with pertinent City regulations as they relate to the implementation of applicable sections of the WATCH manual, Green Book, Brown Book, and LAMC Section 62.61 relating to temporary lane closures. Where construction requires a temporary closure of an existing transit facility (e.g., bus stop), the contractor shall also coordinate with the affected transit providers prior to the start of construction to ensure transit users are informed of the temporary stop relocations. See Attachment F for a discussion of these standard conditions. As such, significant traffic impacts during construction would not occur.

Maintenance and Operations Trip Generation

The maintenance and operational activities from the STAP would include standard service visits, power washing, emergency repairs, and City inspections. Table 3-22 shows the daily trip generation estimates for maintenance and operation activities during the 10-year program (and two optional 5-year extensions). This includes estimates of existing maintenance activities under the CSFP that would be replaced by the STAP.

As demonstrated in Table 3-22, the maintenance activities for the STAP are also a low trip generator. With 64 daily trips replaced by 41 existing trips, the STAP would result in a net increase of less than 250 daily vehicle trips and less than 1,000 VMT per site over existing conditions. Even with the combined daily construction (90 trips) and maintenance trips (23 trips), the project would generate less than 250 trips per day. LADOT guidelines indicate that a project is not required to undertake a further traffic study and does not have the potential to result in significant traffic impacts. As such, a traffic study is not required for the project, and significant traffic impacts during maintenance and operations would not occur.

Table 3-22. Maintenance and Operations Daily Trip Generation Estimates

Type of Service	Annual Trips	Average Daily Trips	Maximum Worker/ Day	Average Daily Vehicles	Average Daily Site/ Vehicle	Average Daily Miles Traveled/ Vehicle	Daily VMT/ Site
Proposed Program Maintenance & Operations							
Standard Service Visit	364,000	1,400	45	40	35	40	46
Power Washing	14,000	54		6	9	40	27
Emergency Repairs	35,000	135		12	11	40	43
City Inspections	14,000	54		6	9	40	27
Existing Maintenance & Operations							
Standard Service Visit	227,500	875	30	25	35	40	29
Power Washing	8,750	34		4	9	40	17
Emergency Repairs	21,875	84		8	11	40	27
City Inspections	8,750	34		4	9	40	17

Source Transportation/Traffic Impact Assessment, Parsons 2021.

In addition, maintenance of the STAP program elements would not block traffic and bicycle lanes. Thus, the project would not conflict with Los Angeles Mobility Plan 2035 and 2010 Bicycle Plan. The impact of the project would be less than significant, and no mitigation is required.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Reference: L.A. CEQA Thresholds Guide (2006) (Section L); LADOT Transportation Assessment Guidelines; Transportation/Traffic Impact Assessment (Parsons, 2021).

Comment: A significant impact would occur if the project generates a net increase of 250 or more daily vehicle trips or generates a net increase of 1,000 VMT or more per site over existing conditions in daily VMT. A significant impact would occur if the project includes retail uses and the portion of the project that contains retail uses exceeds net 50,000 square feet; and if located within 0.5 mile of a fixed-rail or fixed-guideway transit

station, replaces an existing number of residential units with a smaller number of residential units.

Less than significant impact. As discussed above, the estimated trip generation from the project would be less than 250 daily vehicle trips during construction and maintenance/operations. The project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b) during construction and maintenance/operations. The impact of the project would be less than significant, and no mitigation is required.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Reference: L.A. CEQA Thresholds Guide (Section L.5); LADOT Transportation Assessment Guidelines; Transportation/Traffic Impact Assessment (Parsons, 2021).

Comment: A significant impact would occur if the project proposes new driveways, or introduces new vehicle access to the property from the public ROW; or proposes to, or is required to, make any voluntary or required modifications to the public ROW (e.g., street dedications, reconfigurations of curb line).

Less than significant impact. The STAP elements would be designed in accordance with the City's standard plans and would not substantially create or increase hazards at sidewalk areas due to design features. The impact of the project would be less than significant, and no mitigation is required.

d) Would the project result in inadequate emergency access?

Reference: L.A. CEQA Thresholds Guide (Section L.8); LADOT Transportation Assessment Guidelines; Transportation/Traffic Impact Assessment (Parsons, 2021).

Comment: A significant impact would occur if the project resulted in inadequate emergency access.

Less than significant impact. STAP program elements would be located at sidewalk areas, and emergency access would not be substantially inhibited by the new and upgraded transit shelters and sidewalk amenities. Construction at each transit shelter site would last only a few hours of the day and only a few days to complete. No lane closures are anticipated during peak hours. Compliance with the City's regulations and standard practices would reduce the construction impacts to a less than significant level. No mitigation is required.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

A Cultural Resources Study was prepared for the project and is provided in Attachment C. The assessment included an analysis of potential impacts to Tribal Cultural Resources (TCR). The findings of the memo are summarized below.

3.18.1 Regulatory Setting

This section describes existing laws and regulations related to TCR that are applicable to the project.

3.18.1.1 Federal

There are no federal regulations that specifically address impacts related to TCR and are applicable to the project.

3.18.1.2 State

California State Assembly Bill 52

AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. It formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with a project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of an ND, MND, or EIR.

California Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (California Health and Safety Code Division 7, Part 2, Chapter 5, Sections 8010–8030) includes broad provisions for the protection of Native American cultural resources. The Act ensures that all California Native American human remains and cultural items are treated with due respect and dignity. It provides the mechanism for disclosure and return of human remains and cultural items held by publicly funded agencies and museums in California.

3.18.1.3 Local

City of Los Angeles General Plan Conservation Element

The Conservation Element includes goals, objectives, and policies requiring measures be taken to protect the City's historical, archaeological, and paleontological resources for historical, cultural, research, and/or educational purposes. One policy requires that the City continue to identify and protect significant archaeological and paleontological sites and resources known to exist or that are identified during land development, demolition, or property modification activities.

City of Los Angeles Cultural Heritage Ordinance

The City’s Cultural Heritage Ordinance (LAAC Section 22.171) defines an HCM as any site, building, or structure of particular historic of cultural significance. A resource is eligible for listing as an HCM if it meets specific criteria, as outlined in Article 4, Section 22.130 of the LAAC. The City maintains a list of all sites, buildings, and structures that have been designated as HCMs.

3.18.2 Existing Environment

The City was historically occupied by the Gabrielino (also known as Tongva). At the time of European contact, the Gabrielino inhabited the Los Angeles basin and the southern Channel Islands of Santa Catalina, San Nicolas, and San Clemente. The Gabrielino are descended from a Takic-speaking, Uto-Aztecan group that likely entered the Los Angeles Basin as recently as 1500 years before present (BP) from the southern Great Basin or interior California deserts. However, it is also possible that they migrated in successive waves over a longer period of time beginning around 4,000 years BP. The Gabrielino lived in an area that covered more than 1,500 square miles and included the

watersheds of the Los Angeles River, San Gabriel River, Santa Ana River, and Rio Hondo, as well as the southern Channel Islands.

The City's Cultural Heritage Ordinance led to the formation of the Cultural Heritage Commission and a local register of sites, buildings, and structures that have been designated HCMs. HCMs within the City include more than 1,100 historic places (i.e., sites, structures, buildings, resources, districts, and significant street trees). A review of the City's HCM list identified two prehistoric archaeological sites, a Gabrieleño Indian site in the vicinity of Griffith Park (HCM #112) and the Gabrieleño village of Sa'angna near the Ballona wetlands (HCM #490). No NRHP- or CRHR-listed TCRs were identified in the City.

To identify potential Tribal Cultural Resources that could be impacted by the Project, a search of the Sacred Lands File (SLF) was requested from the NAHC on June 17, 2021. NAHC indicated that the record search was positive and to contact the tribes for more information.

Notification letters were sent to tribes and Native American organizations who requested to be notified of City projects under AB 52 and Section 21080.31 of CEQA. While the Tribal Consultation List for Los Angeles County that was obtained from NAHC included several other tribes, the City sent out AB 52 invitations to consult only to those traditionally, culturally affiliated tribes located within and/or near the city of Los Angeles. In compliance with the mandates of AB 52, the City sent letters to fourteen tribal representatives on June 10, 2021, informing them about the STAP and providing an opportunity to consult about the Project. Two tribes have requested consultation (Fernandeño/Tataviam Band of Mission Indians and Gabrieleño Band of Mission Indians – Kizh Nation). These consultations are currently ongoing.

3.18.3 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined Public Resources Code section 5020.1(k)?

Reference: L.A. CEQA Thresholds Guide (2006) (Section D.2); City of Los Angeles General Plan and Community Plans; AB 52 Consultations; HCM List; CRHR; Cultural Resources Study (Paleo Solutions, 2021).

Comment: A significant impact would occur if the proposed project caused a substantial adverse change in the significance of a TCR that is listed or is eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC section 5020.1(k).

Less than significant impact with mitigation incorporated. TCRs are identified through the review of the NAHC's Sacred Lands File (SLF) and through tribal consultations currently being carried out under the auspices of AB 52. While there are no TCRs currently listed on the CRHR, the City's HCM List includes a Gabrieleño Indian site in the vicinity of Griffith Park (HCM #112) and the Gabrieleño village of Sa'angna near the Ballona wetlands (HCM #490). STAP program elements are proposed at sidewalk areas and not at these HCMs. However, there is the possibility that ground-disturbing activities could impact previously undiscovered buried TCRs. Disturbance of undocumented TCRs would be a potentially significant impact without the implementation of mitigation measure TCR-1.

Mitigation Measure

TCR 1: Native American monitors from the consulting Native American Tribes who wish to participate shall be retained to monitor earth-moving activities that extend beyond 3 feet bgs in native soil. Should more than one Tribe wish to participate, Native American monitoring shall be conducted on a rotational basis among the participating Tribes; attendance is ultimately at the discretion of the Tribe(s) and as approved by StreetsLA.

The Native American monitors shall be present for all ground-disturbing activities that extend beyond 3 feet bgs in native soil. Ground-disturbing activities include, but are not limited to, excavation, trenching, grading, and drilling. A sufficient number of Native American monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage.

If an inadvertent discovery of tribal cultural resources is made during project-related construction activities, the Native American monitors shall have the authority to halt ground-disturbing activities within 50 feet of the resource(s) and an ESA physical demarcation shall be constructed. The Qualified Archaeologist and StreetsLA shall be notified regarding the discovery. StreetsLA shall consult with the consulting Native American Tribes regarding the significance and possible avoidance or treatment of the resource.

Impacts would be less than significant after mitigation.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Reference: L.A. CEQA Thresholds Guide (2006) (Section D.2); City of Los Angeles General Plan and Community Plans; HCM List; AB 52 Consultations; Cultural Resources Study (Paleo Solutions, 2021).

Comment: A significant impact would occur if the proposed project caused a substantial adverse change in the significance of a TCR, which is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

Less than significant impact with mitigation incorporated. TCRs are identified through the review of the City's HCM List and NAHC's SLF and through tribal consultations currently being carried out under the auspices of AB 52. In compliance with the mandates of AB 52 and Section 21080.31 of CEQA, notification letters were sent by the City to tribes and Native American organizations whose names were on file with the City, informing them about the STAP and providing an opportunity to consult about the project. Two tribes have responded and requested consultation, and the consultations are ongoing.

There is the possibility that ground-disturbing activities that extend below a depth of 3 feet in native soil could impact previously undiscovered buried TCRs. Disturbance of undocumented TCRs would be a potentially significant impact without implementation of mitigation measure TCR-1 above. Impacts would be less than significant after mitigation.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) 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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

3.19.1 Regulatory Setting

This section describes existing laws and regulations related to utilities and service systems that are applicable to the project.

3.19.1.1 Federal

There are no federal regulations that specifically address impacts related to utilities and that are applicable to the project.

3.19.1.2 State

California Water Plan

The *California Water Plan* (CWP) presents information on California's water resources, such as water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses. The plan identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the state's water needs. It includes resource management strategies and recommendations to strengthen integrated regional water management, including ways to reduce water demand, improve operational efficiency, increase water supply, improve water quality, practice resource stewardship, and improve flood management.

California Integrated Waste Management Act

The *California Integrated Waste Management Act* (AB 939) required each city and county in the State of California and regional solid waste management agencies to enact plans and implement programs to divert 25 percent of its waste stream by 1995 and 50 percent by 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year.

SB 1374 (amending PRC Sections 41821 and 41850 and adds to Section 4291) requires that the annual report mandated by the California Integrated Waste Management Act of 1989 also include a summary of progress made in diversion of construction and demolition waste materials, including information on programs and ordinances implemented by the local government and quantitative data, where available.

Assembly Bill 75

AB 75 (PRC Sections 42920-4297) required all State agencies and large State facilities to divert at least 25 percent of all solid waste from landfills by January 1, 2002, and 50 percent by January 1, 2004. The law also requires each state agency and large facility to submit an annual report to the California Department of Resources Recycling and Recovery (CalRecycle) summarizing its yearly progress in implementing waste diversion programs.

3.19.1.3 Local

City of Los Angeles General Plan Conservation Element and Open Space Element

The Conservation Element calls for the conservation, protection, development, utilization, and reclamation of natural resources, such as water, forests, soils, rivers and other waters, harbors, fisheries, wildlife, minerals, and other natural resources. The Infrastructure Element addresses water supply and demand, measures related to energy conservation and reducing the City's reliance on oil, landfill capacity assessment, wastewater discharge into the ocean and other water bodies, protection of groundwater and watershed resources, solid waste management, as well as electrical and other City-managed resource areas. The Open Space Element provides guidance

for the preservation, conservation, and acquisition of open space in the City, including lands needed for life support systems such as the water supply, water recharge, water quality protection, wastewater disposal, solid waste disposal, air quality protection, energy production, and noise prevention.

City of Los Angeles Water Integrated Resources Plan

Prepared jointly by the Los Angeles Bureau of Sanitation and LADWP, the Water Integrated Resources Plan (WIRP) contains an implementable facility plan through the year 2020 that integrates water supply, water conservation, water recycling, runoff management, and wastewater facilities planning, using a regional watershed approach. The WIRP contains recommendations that would be achieved through a series of projects and policy directions to staff.

City of Los Angeles Emergency Water Conservation Plan

The City Emergency Water Conservation Plan sets standards for water use during an emergency. Ordinance No. 181288, an amendment to Chapter XII, Article I of LAMC, clarified prohibited uses and modified certain water conservation requirements in the Emergency Water Conservation Plan. The ordinance minimizes the effect of a water shortage on the customers of the City and includes provisions that will significantly reduce water consumption over an extended period of time. The Plan sets five water conservation “phases,” which correspond to the severity of water shortage, with each increase in phase requiring more stringent conservation measures related to outdoor watering restrictions, sprinkler use restrictions, and other prohibited water uses.

City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance

The Stormwater and Urban Runoff Pollution Control Ordinance (LAMC Section 64.70) prohibits illicit discharges into the municipal storm drain system and gave the City local legal authority to enforce the NPDES and to take corrective actions with serious offenders. Any commercial, industrial, or construction business found discharging waste or wastewater into the storm drain system would be subject to legal penalties.

City of Los Angeles Sewer Allocation (Ordinance No. 166060)

City Ordinance No. 166,060 (Sewer Allocation) limits the annual increase in wastewater flows discharged into the Hyperion Treatment Plant (HTP) to 5 million gallons per day (mgd). The Los Angeles DPW, BOE Special Order No. S006-0691 changed the design peak dry weather flow for sanitary sewers from three-quarter depth to one-half the sewer diameter to implement the City-adopted goal of no overflows or diversions from the wastewater collection system.

Sewer System Management Plan

The SWRCB adopted the Statewide General WDRs for publicly owned sanitary sewer systems. Under the WDRs, the owners of such systems must develop and implement a Sewer System Management Plan. The City prepared Sewer System Management Plans for each of the City’s three sanitary sewer systems. The Sewer System Management Plans includes objectives to properly fund, manage, operate, and maintain

all parts of the sanitary sewer system; provide adequate capacity to convey base flows and peak flows; and take all feasible steps to stop and mitigate overflows.

Construction and Demolition Waste Recycling Ordinance

To meet AB 939 and SB 1374 mandates, the City adopted the Construction and Demolition Waste Recycling Ordinance (Ordinance 181519, which amended LAMC Sections 66.32 through 66.32.5). This ordinance requires all solid waste haulers and contractors to obtain a permit prior to transporting construction and demolition waste, and stipulates that such waste may only be processed at City-certified construction and demolition waste-processing facilities.

City of Los Angeles Solid Waste Integrated Resources Plan (Zero Waste Plan)

The Solid Waste Integrated Resources Plan (SWIRP), also known as the Zero Waste Plan, is a stakeholder-driven process and long-range master plan for solid waste management in the City. The SWIRP proposes to achieve a goal of 80 percent diversion by 2020 and 95 percent diversion by 2035. These targeted diversion rates are expected to be achieved through an enhancement of existing policies and programs, implementation of new policies and programs, and the development of future facilities to meet the City's recycling and solid waste infrastructure needs over a 20-year planning period.

LADWP Power Integrated Resources Plan

LADWP is responsible for the construction, operation, maintenance, and management of electric works and property for the benefit of the City and developed the 2015 Power Integrated Resource Plan (PIRP) as a comprehensive 20-year roadmap to guide its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner over the next 20 years. The PIRP provides objectives and recommendations to reliably supply LADWP customers with power and to meet SB 1078's 33 percent renewable energy goal by 2020. The 2015 PIRP increases the RPS to 50 percent by 2030.

Urban Water Management Plan

LADWP adopted the 2020 Urban Water Management Plan (UWMP) as required by the California Urban Water Management Act. The UWMP forecasts future water demands and water supplies under average and dry year conditions. It presents strategies that would be used to meet the City's current and future water needs, which focus primarily on water supply reliability and water use efficiency measures.

3.19.2 Existing Environment

Water Supply and Service

LADWP serves residents and businesses in the City and surrounding communities, with more than 681,000 water customers with active service connections. The Los Angeles Aqueduct supplies approximately 48 percent of the City's water, imported water purchased from MWD account for 41 percent, local groundwater resources comprise 9

percent, with recycled water supplies accounting for 2 percent of the City's total water supply in Fiscal Years 2016–2020. Water supply and conveyance structures include 85 pump stations, 115 storage tanks and reservoirs, 329 regulator and relief stations, and a network of pipelines, including 7,340 miles of distribution mains. Between 2016 and 2020, LADWP supplied an average of approximately 495,685 AF of water annually, where the average daily use for all customers in 2020 was 106 gallons per capita per day.

Sewers and Wastewater Treatment

Los Angeles has one of the largest sewer systems in the world, including more than 6,700 miles of sewers in three Sanitary Sewer Systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and the City Regional Sanitary Sewer System. Approximately 400 mgd of wastewater from the City and 29 contracting cities and agencies is treated by these sanitary sewer systems.

The HTP is the largest of the City's three sanitary sewer systems and provides primary and secondary treatment of wastewater. Currently, an average of 275 mgd is conveyed to this system. Approximately 60 mgd is treated upstream at the Donald C. Tilman and Los Angeles-Glendale Water Reclamation Plants. The Donald C. Tillman Water Reclamation Plant is a tertiary treatment plant that is designed to treat 40 mgd and serve the area between Chatsworth and Van Nuys in the San Fernando Valley. The cities of Los Angeles and Glendale co-own the Los Angeles-Glendale Water Reclamation Plant, also a tertiary treatment plant, and the Bureau of Sanitation operates and maintains it. The plant processes approximately 20 mgd. All other flow in the Hyperion System, and the biosolids from these reclamation plants, which is returned to the collection system, are treated at the HTP. On average, 275 mgd enters the HTP on a dry weather day. The HTP is designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd. Treated effluent is discharged from the HTP into Santa Monica Bay via a 7-mile ocean outfall.

The Terminal Island Water Reclamation Plant, approximately 20 miles south of downtown Los Angeles, serves the Harbor area (including San Pedro, Harbor City, and Wilmington). The plant has the capability to provide high-quality tertiary treatment for up to 30 mgd of municipal and industrial flows. A total of 60 percent of the incoming flow to the plant comes from nearby industries, while the remaining 40 percent is from residential areas.

Actual wastewater flow in 2000 was 425 mgd. Projections for 2020 are between 400 and 500 mgd, to account for historical decreases in wastewater flow due to water conservation, economic downturn, and LADWP Tier 1 and Tier 2 rate adjustments.

Stormwater

The City's storm drain system includes streets, driveways, sidewalks, and structures that directly convey runoff to curb and gutter systems, catch basins, culverts, underground storm drain lines, detention/retention basins, and downstream receiving waters (e.g., creeks and rivers). The area-wide storm drainage system is owned and managed by the Los Angeles County Flood Control District (LACFCD).

Solid Waste Disposal

LA Sanitation (LASAN) is responsible for the collection and removal of solid materials and wastes from single-family homes and small multi-family complexes. It collects an average of 6,652 tons per day (tpd) of refuse, recyclables, yard trimmings, horse manure, and bulky items from more than 750,000 homes. Solid waste generated within the City is collected and brought to three materials recovery facilities and one recycling center, with final disposal at area landfills. Medium and large multi-family complexes and commercial businesses are served by permitted private haulers (i.e., Athens, CalMet, NASA, Republic, Universal Waste System, Ware, and Waste Management) and by construction and demolition (C&D) waste processors.

In 2016, the total amount of solid waste (including an import amount of 117,776 tons) disposed at in-county Class III landfills, transformation facilities, and out-of-County landfills was approximately 9.9 million tons. On average, the solid waste disposed for 2016 was 33,026 tpd. In 2016, the City generated a total of 3.9 million tons (10,685 tpd) of solid waste. According to the 2015 Zero Waste Master Plan Report, the City achieved a baseline diversion rate of 72 percent. The City reports a landfill diversion rate of 76.4 percent, using the calculation methodology adopted by the State of California.

A list of the existing available Class III solid waste disposal facilities (landfills accepting municipal and other nonhazardous household waste) in Los Angeles County is provided in Table 3-23. Hazardous wastes are disposed at designated Class I facilities (i.e., landfills accepting hazardous and nonhazardous wastes). The State of California currently operates three designated Class I landfills: the Buttonwillow Hazardous Waste Facility in Kern County, the Kettleman Hills Hazardous Waste Facility in Kings County, and the Imperial (Westmorland) Hazardous Waste Facility in Imperial County.

Table 3-23. Existing Available Class III Solid Waste Disposal Facilities

Landfill	Allowable Disposal Rate (tons per day)	Remaining Life (years)*
Sunshine Canyon	12,100	18
Antelope Valley	5,548	10
Lancaster	5,100	22
Calabasas	3,500	10
Chiquita Canyon	8,974	28
Savage Canyon	350	36
Scholl Canyon	3,400	11
Southeast Resource Recovery Facility	2,240	3
Burbank	240	34
Pebbly Beach	49	9
San Clemente	10	20

* Remaining life based on either the 2018 average daily disposal tonnage, maximum permitted capacity, or the facility's permit expiration date.

Source: County of Los Angeles DPW, Countywide Integrated Waste Management Plan 2019 Annual Report.

Concrete, asphalt, and green wastes removed under City programs are recycled at City facilities (Griffith Park Composting Facility, the Harbor Yard Trimming Facility, or the Lopez Canyon Environmental Center) and not sent to landfills. Generally, the LABSS recycles green waste, asphalt, and concrete at the green waste recycling center run by the Urban Forestry Division (UFD).

3.19.3 Impact Analysis

a) Would the 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section M.1); 2020 UWMP.

Comment: A significant impact would occur if the project resulted in the need for new construction or expansion of water or wastewater treatment facilities and if the volume of stormwater runoff from the project increased to a level exceeding the capacity of the storm drain system serving the project site that could result in an adverse environmental effect that could not be mitigated.

Less than significant impact. The STAP involves the upgrade/replacement and construction of transit shelters and sidewalk amenities. No housing or habitable structures would be built as part of the project.

Water Demand and Wastewater Generation. Construction activities would require limited water at each of the 3,000 transit shelter sites. Similarly, power washing during maintenance activities would use minimal amounts of water. While hydration stations are an optional amenity under consideration, water usage at these facilities is not anticipated to generate a major increase in the demand for water to require construction of a new or expanded water or wastewater treatment facilities.

Storm Drainage. Existing and future transit shelters and sidewalk amenities would be placed in sidewalk areas that are paved and already impervious. Therefore, the volume of runoff is not anticipated to increase. Thus, no increase in volumes of runoff being discharged to the storm drain system are anticipated. No new or expanded stormwater drainage would be required.

Electric Power. Power for the transit shelters would be furnished by LADWP through Bureau of Street lighting circuits; self-contained solar cells or solar roof panels may provide the power at suitable locations. Energy consumption for operation of the transit shelters is expected to range from a minimum of 100 watts per unit time (regular operational draw) for those shelters with static display panels to a maximum of upwards of 800 watts per unit time (regular operational draw) for shelters with digital displays. There would be a temporary peak draw of 1,500 watts when the equipment initially cycles on.

Energy consumption by street furniture would be dependent on the size of the displays, but it is estimated by street furniture type at:

- Transit Shelters 200-440 Watts per month
- Urban Panels/Digital Displays 500-800 Watts per month
- Smart Components 100-200 Watts per month
- Vending Kiosks 500-600 Watts per month
- Interactive Kiosks 700-800 Watts per month

As discussed in Section 3.6.3, electrical power consumption at each transit shelter is conservatively estimated at an approximate average of 4,400 to 1,240 watts of electricity while operating for 12 hours per day (ranging from 5.6 to 14.9 kWh per day per transit shelter location). The 3,000 transit shelters would consume approximately 9,285.6 MWh annually, with existing transit shelters consuming 3.630.8 MWH annually and a net increase of 5.654.8 MWH annually. As discussed in Section 3.6.3, this is 0.02 percent of LADWP's total 2019 electricity consumption. LADWP maintains a dependable generating capacity of 8,009 MW, with a record peak demand of 6,500 MW. Therefore, LADWP has an approximately 18.8 percent surplus for peak demand. Given the generating capacity of LADWP, combined with the estimated peak instantaneous demand of 1,500 watts at all 3,000 shelters or for 4.5 MW from the potential usage of self-contained solar cells or solar roof panels at some transit shelters, demand on LADWP's electrical grid would be minimal, and impacts would be less than significant. No mitigation is required.

Other Utilities. The project would not build structures requiring telecommunication facilities or natural gas. The potential provision of public Wi-Fi and Broadband 5G telecommunications service, and charging ports or stations would be through small-cell towers, and physical structures and devices, embedded sensors, fiber-optic cabling, and networked systems would become part of the City's digital infrastructure inventory. These services would be at scattered locations throughout the City and would not require any major infrastructure upgrades at each transit shelter site. Impacts would be less than significant, and no mitigation is required.

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

Reference: L.A. CEQA Thresholds Guide (Section M.1).

Comment: A significant impact would occur if the project would require water supplies that would result in a water shortage during normal, dry, or multiple dry years.

Less than significant impact. As discussed above, construction and maintenance of the new and upgraded transit shelters would require minimal amounts of water at scattered shelter sites throughout the City. The project would require water at optional hydration stations that may be placed near the transit shelters. The volumes of water

needed to operate these facilities is anticipated to be negligible compared to the total water usage in the City. During water shortages, water use at the transit shelters would also comply with the City's mandatory conservation measures. Impacts to available water supplies would be less than significant. No mitigation is required.

c) Would the 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?

Reference: L.A. CEQA Thresholds Guide (Section M.2).

Comment: A significant impact would occur if the project generated wastewater in excess of what current wastewater treatment providers would be able to process.

Less than significant impact. Wastewater is not expected to be generated during construction of the transit shelters and during routine maintenance. Construction maintenance crews are expected to use the contractor yards or portable toilets that would generate limited wastewater. Optional hydration stations may be installed near the transit shelters, and the volumes of wastewater associated with routine maintenance and operation of these facilities is anticipated to be minor and at scattered locations and would be served by the City's three sewer systems. Thus, impacts related to the need for wastewater treatment would be less than significant, and no mitigation is required.

d) Would the 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?

Reference: L.A. CEQA Thresholds Guide (Section M.3).

Comment: The management of solid waste in the City involves public and private refuse collection services, as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. A significant impact may occur if the project were to increase solid waste generation to a degree that existing and projected landfill capacities would be insufficient to accommodate the additional waste. Furthermore, a significant impact may occur if the project would generate solid waste that was in excess of or was not disposed of in accordance with applicable regulations.

Less than significant impact. Construction of the project would occur over a 3- to 6-year time period. Of the approximately 1,884 existing transit shelters to be removed, approximately 664 shelters are expected to be refurbished and temporarily redistributed to bus stop locations that are currently absent of transit shelters, rather than being disposed of or having their materials recycled right away. Ultimately, most of the existing shelters slated to be removed and the shelter components would be sent to a recycling center and/or landfill with as much material as possible being recycled. These efforts would continue to help the City maintain or improve its solid waste diversion rate.

As stated above, estimates of solid waste generation from existing shelter facilities are approximately 50 tons of solid waste per year. Using a scaling factor of 1.6 based on the total number of active shelters, annual solid waste generation with implementation of the project was estimated to be 80 tons per year or 1.53 tons per week citywide. These solid wastes would typically be generated by the public using transit system, and trash collection from public streets are the services provided by the City on an ongoing basis. The impact would be considered less than significant. No mitigation is required.

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

Reference: L.A. CEQA Thresholds Guide (Section M.3).

Comment: A significant impact would occur if the proposed project generated solid waste that was in excess of or was not disposed of in accordance with applicable regulations.

Less than significant impact. Construction and maintenance of the transit shelters would comply with federal, State, and local statutes and regulations regarding solid waste. As discussed above, existing transit shelters would be refurbished and reused or shelter components recycled. In addition, litter/recyclable receptacles would be provided at each new and upgraded transit shelter. Impacts would be less than significant, and no mitigation is required.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, 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?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐

3.20.1 Regulatory Setting

This section describes existing laws and regulations related to wildfire that are applicable to the project.

3.20.1.1 Federal

Federal Wildland Fire Management Policy

The 1995 Federal Fire Policy recognized the essential role of fire in maintaining natural systems. It was updated in 2001 and includes guiding principles for firefighter and public safety; the role of wildland fire as an essential ecological process and natural change agent; fire management plans, programs, and activities that support land and resource management plans; sound risk management; economically viable fire management programs and activities; use of best available science; public health and environmental

quality considerations; federal, State, tribal, local, interagency, and international coordination and cooperation; and standardized policies and procedures.

3.20.1.2 State

2018 Strategic Fire Plan for California

The 2018 Strategic Fire Plan for California is a cooperative effort between the State Board of Forestry and Fire Protection and CalFire to address fire concerns in California, including adequate statewide fire protection of state responsibility areas. The plan addresses fire prevention, natural resource management, and fire suppression efforts.

Fire Hazard Severity Zones – Public Resources Code Sections 4201–4204

PRC Sections 4201–4204, directed CalFire to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as fire hazard severity zones (FHSZ), define the application of various mitigation strategies to reduce risk associated with wildland fires.

Government Code Sections 51175–51189 established the classification for very high fire hazard severity based on fuel loading, terrain, weather, and other relevant factors identified by CalFire as major causes of wildfire spread and on the severity of fire hazard that is expected to prevail in those areas. The code established the requirements for those that maintain an occupied dwelling within a designated very high fire hazard severity zone (VHFHSZ).

Fire Safe Development Regulations

Fire Safe Development Regulations were developed to implement PRC Section 4290 and stipulate minimum requirements for building construction in State Responsibility Areas. These regulations address ingress and egress (e.g., road widths, turnouts), building and street sign visibility, emergency water standards, and fuel modification. Changes to the Fire Safe Development Regulations were incorporated into the 2020 California Fire Code.

California Building Code and Fire Code

CCR Title 24 is a compilation of building standards, including fire safety standards for residential and commercial buildings. The California Building Code standards serve as the basis for the design and construction of buildings in California. The California Fire Code is a component of the California Building Code and includes fire safety requirements related to the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The California Fire Code applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific California Fire Code regulations have been incorporated by reference, with amendments, in the Los Angeles Building Code, Fire Safety Regulations.

3.20.1.3 Local

Los Angeles Brush Clearance Requirements

City Ordinance No. 185789 prohibits the use of certain metal cutting blades for brush clearance activities in VHFHSZs, and establishes specific requirements and penalties for violations for brush clearance activities.

City of Los Angeles General Plan Safety Element

The Safety Element identifies wildfire hazard areas in the City and sets specific policies and objectives related to hazard mitigation, emergency response, and disaster recovery, including standards for fire station distribution and location, fire suppression water flow (or "fire flow"), firefighting equipment access, emergency ambulance services, and fire prevention activities. It serves as a guide for the construction, maintenance, and operation of fire protection facilities in the City.

City of Los Angeles Hazard Mitigation Plan

The 2018 HMP was prepared to lessen the City's vulnerability to disasters and to reduce risks from natural hazards. It serves as a guide for decision makers and commits City resources to minimize the effects of natural hazards. The HMP integrates with existing planning mechanisms, such as building and zoning regulations, long-range planning mechanisms, and environmental planning, and includes a hazard vulnerability analysis, community disaster mitigation priorities, and mitigation strategies and projects. The Los Angeles Department of EOO is responsible for implementing the Plan, including the City's emergency preparations (i.e., planning, training, and mitigation), response and recovery operations.

3.20.2 Existing Environment

CalFire protects the people of California from fires, responds to emergencies, and protects and enhances forest, range, and watershed values providing social, economic, and environmental benefits to rural and urban citizens. CalFire's firefighters, fire engines, and aircraft respond to an average of more than 5,600 wildland fires each year. The Office of the State Fire Marshal supports CalFire's mission by focusing on fire prevention and provides support through fire safety responsibilities (i.e., review of building regulations and standards, control of substances and products that may cause fires; statewide direction for fire prevention in wildland areas; regulations for hazardous liquid pipelines; and training and education in fire protection methods and responsibilities).

There has been an increasing frequency and size of wildfires in the region, including historic brushfires in the City such as the La Tuna, Creek, and Skirball fires. Smaller brush fires have also been accidentally started by brush clearance activities. Under the direction of CalFire, the City determined the VHFHSZs within its jurisdiction, as defined in LAMC Sections 57.4908.1.1 through 57.4908.1.3. These VHFHSZs are located in the hilly and mountainous areas in the communities of Baldwin Hills, Bel Air Estates, Beverly Glen, Brentwood, Castellammare, Chatsworth, Eagle Rock, East Los Angeles,

Echo Park, El Sereno, Encino, Glassell Park, Granada Hills, Hollywood, Lake View Terrace Los Angeles, Los Feliz, Montecito Heights, Monterey Hills, Mount Olympus, Mount Washington, Pacific Palisades, Pacoima, Palisades Highland, Porter Ranch, San Pedro, Shadow Hills, Sherman Oaks, Silver Lake, Studio City, Sunland, Sun Valley, Sylmar, Tarzana, Tujunga, West Hills, Westwood, and Woodland Hills.

LAFD responds to fire emergencies, including wildfires and brush fires. The HMP outlines the responsibilities of various City departments for providing emergency public information regarding emergency alert and warning, notifications, evacuations, and shelters.

3.20.3 Impact Analysis

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.2); General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact would occur if the project were to substantially impair an adopted emergency response plan or emergency evacuation plan.

Less than significant impact. While there are areas in the City that are susceptible to wildfires (i.e., areas designated as VHFHSZ), the STAP would replace and provide new transit shelters and sidewalk amenities and would not be located on roadway travel lanes that would serve as emergency response routes or emergency evacuation routes in the event of wildfires. While the transit shelters would occupy sidewalk areas that may serve as access to or from wildfire sites, adjacent sidewalk areas would still be available to provide access. It is also expected that the required brush clearance activities and emergency planning by LAFD are ongoing to limit the potential for wildfires in the City. As such, impacts to emergency response and emergency evacuation would be less than significant. No mitigation is required.

b) 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.2); General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact may occur if construction or operation of the project exacerbates wildfire risks and thereby exposes project occupants to pollutant concentrations from a wildfire to a degree that would significantly affect the project occupants.

Less than significant impact. While there are wildfire hazard areas in the City, STAP elements would be designed and constructed in accordance with the DPW standards, State Streets and Highways Code, and City adopted policies and standards established

by FHWA and American Association of State Highway and Transportation Officials (AASHTO), and would not create fire hazards or be flammable. They would also be located on sidewalk areas and not on steep slopes or large brush areas that could exacerbate wildfire risks or contribute to the spread of wildfire. Transit shelters that are or would be located in or near wildfire hazard areas would be exposed to wildfire hazards but would not increase these hazards. Impacts would be less than significant, and no mitigation is required.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.2); General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact would occur if the proposed project required the installation or maintenance of infrastructure that may exacerbate the fire risk or that may result in temporary or ongoing impact to the environment.

Less than significant impact. While new and upgraded transit shelters may be located in or near wildfire hazard areas, the STAP does not propose the construction of new roads or the installation of new power lines in any area, including those susceptible to wildfires. No emergency water sources or other utilities are proposed as part of the STAP program elements. Power use by the transit shelters and sidewalk amenities would be obtained from existing power lines or self-contained solar cells or solar roof panels. These electrical connections would be constructed in accordance with the DPW standards, State Streets and Highways Code, and City adopted policies and standards established by FHWA and AASHTO, and would not create fire hazards. Impacts related to new infrastructure would be less than significant, and no mitigation is required.

d) 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?

Reference: L.A. CEQA Thresholds Guide (2006) (Section K.2); General Plan Safety Element; CalFire Fire Hazard Severity Zones; Los Angeles Hazard Mitigation Plan.

Comment: A significant impact would occur if the proposed project exposed 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.

Less than significant impact. While there are areas in the City that are susceptible to wildfires, STAP program elements would be located on sidewalk areas and not on steep slopes or large brush areas that are subject to wildfires. They would also be designed and constructed in accordance with applicable Structural, Seismic, Plumbing and Electrical Codes, and other specific City-adopted policies and standards applicable to the public ROW, and would not contribute to wildfire hazards. Wildfires that result in

flooding or landslides from runoff, post-fire slope instability, or drainage changes may affect the transit shelters that are located nearby and downstream, as well as transit users. However, the shelters are open structures that would not expose people to wildfire risks and would allow easy evacuation of transit users. Impacts would be less than significant, and no mitigation is required.

3.21 Mandatory Findings

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

3.21.1 Impact Analysis

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Reference: L.A. CEQA Thresholds Guide (2006); City of Los Angeles General Plan and Community Plans.

Comment: See Section 3.4 Biological Resources; Section 3.5, Cultural Resources; and Section 3.18, Tribal Cultural Resources.

Less than significant impact. As discussed in Sections 3.4, 3.5, and 3.18, implementation of the STAP would have the potential for significant adverse impacts on biological and cultural resources and TCRs. However, mitigation measures have been developed to reduce these impacts to less than significant levels.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Reference: L.A. CEQA Thresholds Guide (2006); City of Los Angeles General Plan and Community Plans.

Comment: See Sections 3.1 through 3.20 for a discussion of significant impacts by environmental issue.

Less than significant impact. Implementation of the STAP, including construction and maintenance and operations activities would occur at 3,000 locations throughout the City. Some impacts would be confined to individual transit shelter sites and would not be cumulative in nature (i.e., aesthetics, biological resources, cultural resources, geology, hazards and hazardous materials, hydrology, noise, TCRs, and wildfire). Other impacts would be cumulative and have been analyzed as such as they relate to air quality, energy, GHG emissions, land use and planning, mineral resources, public services, recreation, transportation, and utilities. With implementation of mitigation measures, impacts would be less than significant.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Reference: L.A. CEQA Thresholds Guide (2006).

Comment: See Sections 3.1 through 3.20 above for a discussion of significant impacts by environmental issue.

Less than significant impact. The STAP would have potentially significant impacts related to land use and planning and noise. However, with implementation of mitigation measures, impacts would be less than significant.

4.0 MITIGATION MEASURES

Aesthetics

Impacts would be less than significant, and no mitigation is required.

Agriculture and Forestry

No impacts would occur, and no mitigation is required.

Air Quality

Impacts would be less than significant, and no mitigation is required.

Biological Resources

BIO-1 Vegetation clearing and construction in areas near mature trees or potential habitat for nesting birds shall be conducted between September 1 and February 15. Otherwise, a Qualified Biologist shall conduct a preconstruction nesting bird survey to determine if any nesting birds are present within 50 feet of the work site. This survey will be conducted no more than 7 days before the start of construction. Should nesting birds be found, an exclusionary buffer will be clearly marked around each active nest site. Construction or clearing shall not be conducted within this zone until the Qualified Biologist determines that the young have fledged or the nest is no longer active.

Cultural Resources

CUL-1: A Qualified Archeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall be retained for the project and will remain on call during all ground-disturbing activities. The Qualified Archaeologist shall ensure that a WEAP training, presented by a Qualified Archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures to be followed in the event of an unanticipated cultural resource find during construction. The WEAP training can be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

CUL-2: If an inadvertent discovery of archaeological materials is made during project-related construction activities, ground disturbances in the area of the find shall be halted within 50 feet of the find and the Qualified Archaeologist shall be notified of the discovery, who shall notify LABOE. If prehistoric or potential tribal cultural resources are identified, the consulting Native American Tribes shall be notified. The resource shall be fully documented by the Qualified Archaeologist or designee and a DPR 523 record shall be prepared.

The Qualified Archaeologist, in consultation with consulting Native American Tribes and LABOE, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is an historical resource, a unique archaeological resource, or tribal cultural resources). If avoidance is not feasible, the Qualified Archaeologist, in consultation with the City, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources will consist of, but will not be limited to, in-field documentation, archival research, subsurface testing, excavation, and preparation of a final report and DPR 523 record. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of the final report and DPR 523 record(s) to LABOE and the South Central Coastal Information Center.

CUL-3: Should excavation activities extend past 3 feet bgs, an archaeological monitor shall be present for all ground-disturbing activities in native soil within the construction area. All archaeological monitors, working under supervision of the Qualified Archaeologist, shall have construction monitoring experience and be familiar with the types of historical and prehistoric resources that can be encountered. Ground-disturbing activities include, but are not limited to, excavation, trenching, grading, and drilling. A sufficient number of archaeological monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. The Qualified Archaeologist shall have the ability to recommend, with written and photographic justification, the reduction or termination of monitoring efforts to LABOE, and should LABOE and the consulting Native American Tribes concur with this assessment, then monitoring shall be reduced or ceased.

If an inadvertent discovery of archaeological materials is made during project-related construction activities, the archaeological monitor shall have the authority to halt ground-disturbing activities within 50 feet of the resource(s), and an ESA physical demarcation shall be constructed. The procedures for inadvertent discoveries described in CUL-1 shall be followed.

CUL-4: In the event of the inadvertent discovery of human remains, the contractor shall immediately notify the County Coroner and LABOE. If the County Coroner determines the remains are Native American in origin, the Coroner shall contact the NAHC in accordance with Health and Safety Code Section 7050.5 subdivision c, and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate the MLD for the remains per PRC 5097.98. Under PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the MLD regarding their recommendations, if applicable. If the remains are

determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the California Health and Safety Code Section 7100 37 *et seq.* directing identification of the next-of-kin will apply.

PAL-1: A Qualified Professional Paleontologist meeting the standards outlined in the SVP guidelines (2010) shall be retained for the project and will remain on call during all ground-disturbing activities. The Qualified Professional Paleontologist shall ensure that a WEAP training is provided to all construction and managerial personnel involved with the project. The WEAP training shall provide an overview of paleontological resources and outline regulatory requirements for the protection of paleontological resources. The WEAP will also cover the proper procedures in the event of an unanticipated paleontological resource discoveries. The WEAP training can be in the form of a video or PowerPoint presentation. Printed literature (handouts) can accompany the training and can also be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

PAL-2: If an inadvertent discovery of paleontological materials is made during project-related construction activities, ground disturbances in the area of the find shall be halted, and the Qualified Professional Paleontologist shall be notified regarding the discovery.

The Paleontologist, in consultation with StreetsLA, shall determine whether the resource is potentially significant. If determined to be significant, the paleontological resources will be recovered, prepared to the point of curation, identified, analyzed, and curated at the Natural History Museum of Los Angeles County or another accredited repository along with associated field data. At the completion of ground-disturbing activities, a report documenting the methods and results of paleontological fieldwork will be prepared by the Qualified Professional Paleontologist and submitted to StreetsLA and the fossil repository.

Energy

Impacts would be less than significant, and no mitigation is required.

Geology and Soils

Impacts would be less than significant, and no mitigation is required.

Greenhouse Gas Emissions

Impacts would be less than significant, and no mitigation is required.

Hazards and Hazardous Materials

Impacts would be less than significant, and no mitigation is required.

Hydrology and Water Quality

Impacts would be less than significant, and no mitigation is required.

Land Use and Planning

LU-1 As provided in the individual specific plans, transit shelters (relocated or new) and associated amenities and signs to be located within the planning areas of adopted Specific Plans and Streetscape Plans shall be designed to comply (and subject to design review, if necessary) with applicable design guidelines and standards and sign regulations for street furniture and signs installed in the public road ROW prior to installation/construction.

LU-2 Transit shelters (relocated or new) and associated amenities to be located within overlay zones, Streetscape Plans, and CDO districts shall be designed to comply with applicable design guidelines and standards and sign regulations that are applicable to street furniture and signs in the public road ROW.

LU-3 Transit shelters (relocated or new) and associated amenities to be located within HPOZs shall be designed to comply with applicable guidelines and standards and sign regulations for street furniture and signs in the public road ROW as contained in individual Preservation Plans as approved by the individual Historic Preservation Boards.

Mineral Resources

No impacts would occur, and no mitigation is required.

Noise

NOI-1: When applicable (i.e., at instances when noise levels may approach or exceed City noise criteria), the following noise control measures should be adhered to:

- Construction or use of noise barriers, enclosures, or blankets
- Use of low noise, low vibration, low emission-generating construction equipment (e.g., *[quieter]* Tier 4 engines), as needed
- Maintenance of mufflers and ancillary noise abatement equipment
- Scheduling high noise-producing activities during periods that are least sensitive when most people are at work during daytime hours
- Routing construction-related truck traffic away from noise-sensitive areas
- Reducing construction vehicle speeds

Population and Housing

No impacts would occur, and no mitigation is required.

Public Services

Impacts would be less than significant, and no mitigation is required.

Recreation

No impacts would occur, and no mitigation is required.

Transportation

Impacts would be less than significant, and no mitigation is required.

Tribal Cultural Resources

TCR 1: Native American monitors from the consulting Native American Tribes who wish to participate shall be retained to monitor earth-moving activities that extend beyond 3 feet bgs in native soil. Should more than one Tribe wish to participate, Native American monitoring shall be conducted on a rotational basis among the participating Tribes; attendance is ultimately at the discretion of the Tribe(s) and as approved by StreetsLA.

The Native American monitors shall be present for all ground-disturbing activities that extend beyond 3 feet bgs in native soil. Ground-disturbing activities include, but are not limited to, excavation, trenching, grading, and drilling. A sufficient number of Native American monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage.

If an inadvertent discovery of tribal cultural resources is made during project-related construction activities, the Native American monitors shall have the authority to halt ground-disturbing activities within 50 feet of the resource(s), and an ESA physical demarcation shall be constructed. The Qualified Archaeologist and StreetsLA shall be notified regarding the discovery. StreetsLA shall consult with the consulting Native American Tribes regarding the significance and possible avoidance or treatment of the resource.

Utilities and Service Systems

Impacts would be less than significant, and no mitigation is required.

Wildfire

Impacts would be less than significant, and no mitigation is required.

Mandatory Findings

With implementation of the mitigation measures listed above, project impacts would be less than significant.

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5.0 PREPARATION AND CONSULTATION

5.1 Preparers

Parsons
Anne Kochaon, Program Manager
Greg King, QA/QC Manager
Josephine Alido, AICP, Principal Planner/Task Manager
Angela Schnapp, Principal Project Manager
Nak Kim, PE, Principal Traffic Engineer
Thanh Luc, Noise Specialist/Manager
Jason Ogden, Senior Noise Control Specialist
Jeff Lormand, RLA, Landscape Architect/Visual and Aesthetic Specialist
Katherine Ryan, Environmental Planner, GIS Specialist
Elizabeth Koos, Editor

Terry Hayes and Associates
Anders Sutherland, Senior Environmental Scientist

Paleo Solutions
Evelyn Chandler, RPA, Cultural Resources Specialist
Courtney Richards, Paleontologist

Katherine Padilla and Associates
Katherine Padilla, President, Public Outreach Manager
Jessica Padilla-Bowen, Senior Associate
Lorena Hernandez, Project Manager

5.2 Coordination and Consultation

City of Los Angeles BOE, EMG
Norman Mundy, Environmental Supervisor II

City of Los Angeles Bureau of Street Services, Engineering Services Division
Lance Oishi, Contract Administrator
Audrey Netsawang, Project Assistant

California Native American Heritage Commission
Fernandeño/Tataviam Band of Mission Indians
Gabrieleño Band of Mission Indians – Kizh Nation
Gabrielino Tongva Indians of California Tribal Council
Gabrielino/Tongva Nation
Gabrielino-Tongva Tribe
Gabrielino/Tongva San Gabriel Band of Mission Indians
LA City/County Native American Indian Commission
San Fernando Band of Mission Indians
Soboba Band, Luiseno Indians
Ti'At Society/Inter Tribal Council of Pimu

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6.0 DETERMINATION – RECOMMENDED ENVIRONMENTAL DOCUMENTATION

6.1 Summary

The analysis in this IS and the supporting technical reports indicate that the STAP would potentially result in significant adverse environmental impacts on biological resources, cultural resources, paleontological resources, land use and planning, noise, and tribal cultural resources. These impacts can be mitigated to less than significant levels with implementation of mitigation measures. With incorporation of these mitigation measures into the project, an MND may be adopted by the City in compliance with CEQA.

6.2 Recommendation Environmental Documentation

The City intends to adopt an MND prior to a decision on the project.

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7.0 REFERENCES

California Air Resources Board (CARB). AB 32 Climate Change Scoping Plan. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan.

California Coastal Commission. 2019. Laws & Regulations, The Coastal Act. https://www.coastal.ca.gov/laws/.

California Department of Conservation (CDOC). 2021a. California Farmland Mapping and Monitoring Program. https://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx.

———. 2021b. Williamson Act Program. https://www.conservation.ca.gov/dlrp/wa.

———. 2021c. Fault Activity Map of California. https://maps.conservation.ca.gov/cgs/fam/.

———. 2021d. CGS Information Warehouse: Regulatory Maps. https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/.

———. 2021e. Wellfinder. https://maps.conservation.ca.gov/doggr/wellfinder/.

———. 2021f. CGS Information Warehouse: Mineral Land Classification. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc.

California Department of Finance (DOF). 2021, May. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. https://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

California Department of Fish and Wildlife (CDFW). 2021. NCCP Plan Summaries. https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans.

California Department of Forestry and Fire Protection (CalFire). 2021. FHSZ Viewer. https://egis.fire.ca.gov/FHSZ/.

California Department of Transportation (Caltrans). 2021a. Standard Environmental Reference, Chapter 27: Visual and Aesthetics Review. https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser.

———. 2021b. California State Scenic Highways. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

California Department of Water Resources (DWR). 2021. Basin Prioritization. https://water.ca.gov/programs/groundwater-management/basin-prioritization.

California Emissions Estimator Model (CalEEMod). 2017. California Emissions Estimator Model. http://www.caleemod.com/.

California Energy Commission. 2016. California Energy Consumption Database. https://ecdms.energy.ca.gov/.

———. 2019. Final 2019 Integrated Energy Policy Report. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report.

California Environmental Protection Agency (CalEPA). 2021. Cortese List Data Resources. https://calepa.ca.gov/sitecleanup/corteselist/.

California Office of Historic Preservation. 2021. California Historical Resources. https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=30.

City of Los Angeles. 2021a. City of Los Angeles Municipal Code. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-107363.

———. 2021b, May. Historic-Cultural Monument (HCM) List. https://planning.lacity.org/odocument/24f6fce7-f73d-4bca-87bc-c77ed3fc5d4f/Historical_Cultural_Monuments_List.pdf.

———. 2021c. City of Los Angeles Administrative Code. https://codelibrary.amlegal.com/codes/los_angeles/latest/laac/0-0-0-7036.

———. 2021d. City of Los Angeles Bus Shelter Program. http://www.outfrontjcdecaux.com/.

———. 2021e. Coordinated Street Furniture Program. https://streetsla.lacity.org/coordinated-street-furniture-program.

———. 2021f. Demographics. https://planning.lacity.org/resources/demographics.

———. 2021g. Sidewalk and Transit Amenities Program. https://www.arcgis.com/apps/webappviewer/index.html?id=114922520e2e4713be75c4188028e205&extent=-13163271.6962%2C4035719.0167%2C-13162340.1199%2C4036273.7824%2C102100.

———. 2021h. Plan Overlays. https://planning.lacity.org/plans-policies/overlays.

———. 2021i. Sewer System Management Plan (SSMP). https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s/s-lsh-wwd-cw-s-ssmp?_afrLoop=3079726113985838&_afrWindowMode=0&_afrWindowId=myso6oy85&_adf.ctrl-state=slfm4iaol_396#!%40%40%3F_afrWindowId%3Dmyso6oy85%26_afrLoop%3D3079726113985838%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dslfm4iaol_400.

———. 2021j. Existing Community Plans. https://planning.lacity.org/plans-policies/community-plans.

———. 2021k. General Plan Overview. https://planning.lacity.org/plans-policies/general-plan-overview.

———. 2020. 2020 Floodplain Management Plan Update. https://eng.lacity.org/about-us/divisions/street-improvement/2020-floodplain-management-plan-update.

———. 2018a. L.A.'s Green New Deal, Sustainability pLAn 2019. https://plan.lamayor.org/.

———. 2018b. 2018 Local Hazard Mitigation Plan. https://emergency.lacity.org/sites/g/files/wph1791/files/2021-03/2018_LA_HMP_Final_2018-11-30.pdf.

———. 2007. GREEN LA, An Action Plan to Lead the Nation In Fighting Global Warming. https://planning.lacity.org/eir/8150Sunset/References/4.E.%20Greenhouse%20Gas%20Emissions/GHG.26_City%20LA%20GreenLA%20ActionPlan.pdf.

———. 2006. L.A. CEQA Thresholds Guide. https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf.

County of Los Angeles. 2021. Significant Ecological Areas Program. https://planning.lacounty.gov/site/sea/maps/.

———. 2010. 2010 Congestion Management Program. http://libraryarchives.metro.net/DPGTL/programs/congestion-management-program-lacmta/2010-congestion-management-program.pdf.

———. 2009. Airport Land Use Commission (ALUC). https://planning.lacounty.gov/aluc/airports#anc-apm.

Federal Emergency Management Agency (FEMA). 2021. FEMA’s National Flood Hazard Layer (NFHL) Viewer. https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.

Federal Highway Administration (FHWA). 2021. America’s Byways. https://www.fhwa.dot.gov/byways/.

Los Angeles Bureau of Sanitation (LASAN). 2021. Solid Resources. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s?_adf.ctrl-state=146evh00m3_236&_afrLoop=14193308876591612#!.

County of Los Angeles Department of Public Works. 2020, September. Countywide Integrated Waste Management Plan 2019 Annual Report. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF.

Los Angeles County Flood Control District (LACFCD). 2021. Los Angeles County Storm Drain System. https://pw.lacounty.gov/fcd/StormDrain/index.cfm.

Los Angeles Department of Recreation and Parks. 2021. Who We Are. https://www.laparks.org/department/who-we-are.

Los Angeles Department of Transportation (LADOT). 2020, July. Transportation Assessment Guidelines. https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf.

Los Angeles Department of Water and Power (LADWP). 2020. Urban Water Management Plan. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln;jsessionid=wLysgdKfvvlwZGKnblNg8hggnLGrH8y01kpbKpnpdspvTym0021L!1605159942?_afrLoop=1018729042348199&_afrWindowMode=0&_afrWindowId=nul.

———. 2017. 2017 Power Strategic Long-Term Resource Plan. https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=3cspi3he8_17&NF=1%3FNF=1&&_afrLoop=1015889209652267.

———. 2013. Facts and Figures. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=7s7pxavcq_17&_afrLoop=1365705623579821&_afrWindowMode=0&_afrWindowId=mp2ty2rrq_14#%40%3F_afrWindowId%3Dmp2ty2rrq_14%26_afrLoop%3D1365705623579821%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dmp2ty2rrq_63.

Los Angeles Fire Department (LAFD). 2021a. Our Mission. https://www.lafd.org/about/about-lafd/our-mission.

———. 2021b. HazMat. https://www.lafd.org/about/special-operations/hazmat.

———. 2018. Strategic Plan. https://www.lafd.org/about/about-lafd/strategic-plan#:~:text=The%20Los%20Angeles%20Fire%20Department's,first%20ever%20LAFD%20Strategic%20Plan.&text=With%20the%20collective%20efforts%20of,create%20a%20more%20optimal%20LAFD.

Los Angeles Police Department (LAPD). 2021. Inside the LAPD. https://www.lapdonline.org/inside_the_lapd.

Los Angeles Regional Water Quality Control Board. 2020, May. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html.

———. 2013, June. Order No. R4-2013-095, NPDES No. CAG994004. https://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/permits/general/npdes/r4-2013-0095/Dewatering%20Order.pdf.

Los Angeles Unified School District (LAUSD). 2021a. About the Los Angeles Unified School District. https://achieve.lausd.net/domain/32.

———. 2021b. Local District Map. https://achieve.lausd.net/domain/34.

Paleo Solutions. 2021. Cultural Resources Impact Analysis.

Parsons. 2021a. Noise and Vibration Impact Analysis.

———. 2021b. Aesthetics and Visual Impact Analysis.

———. 2021c. Transportation/Traffic Impact Assessment.

———. 2021d. Land Use Consistency Analysis.

Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact.

South Coast Air Quality Management District (SCAQMD). 2021a. Air Quality Management Plan (AQMP). http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan.

———. 2021b. Rules. http://www.aqmd.gov/home/rules-compliance/rules.

———. 2021c. Regulations. http://www.aqmd.gov/home/rules-compliance/regulations.

———. 2021d. Air Quality Analysis Handbook. https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

———. 1993. CEQA Air Quality Handbook.

Southern California Association of Governments. September 2020. 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. https://scag.ca.gov/read-plan-adopted-final-plan.

Terry A. Hayes and Associates (TAHA). 2021. Air Quality and Greenhouse Gas Emissions Analysis.

United States Fish and Wildlife Service (USFWS). 2021a. Critical Habitat for Threatened & Endangered Species. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77.

———. 2021b. National Wetlands Inventory Wetlands Mapper. https://www.fws.gov/wetlands/data/Mapper.html.

United States Forest Service (USFS). 2021. National Forest Locator Map. https://www.fs.fed.us/ivm/.

United States Geological Survey (USGS). 2021. The National Map – Advanced Viewer. https://apps.nationalmap.gov/viewer/.

United States National Park Service. 2021. National Register of Historic Places, National Register Database and Research. https://www.nps.gov/subjects/nationalregister/database-research.htm.